Future Development Strategy

Local Board Not Supplied

WRITTEN FEEDBACK
Volume 2

Date published: **Friday, 10 August 2023**

Future Development Plan 2023 #5565

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?

Agree

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?

Agree

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?

Agree

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?

Agree

Tell us why

Other feedback

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

1. Improve road facilities. 2. Reduce the crime rate. 3. Build an undersea harbour tunnel from the North Shore to the City centre.

Future Development Plan 2023 #5567

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Tell us why

Other feedback

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Urban development requires a safe social environment.

Future Development Plan 2023 #5596

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Tell us why

For the convenience of our life.

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Avoid hazard

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Agree

Tell us why
To better respond to the climate changes

Other feedback

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We must strengthen law and order. Without a good and safe working and living environment, it will be difficult to develop. I recommend that more efforts should be made to strictly enforce law and order.

Future Development Plan 2023 #5603

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I don't know

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Disagree

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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?

Disagree

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?

Agree

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?

Disagree

Tell us why

Waste the taxpayers' money again. What were you doing early on?

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?

I don't know

Tell us why

Other feedback

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

Change the government, change the mayor and step down the Labour party.

Future Development Plan 2023 #5661

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Your feedback

Focusing growth

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

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

I don't know

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?

Other

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?

Agree

Tell us why
It's important for us

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?

I don't know

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 Plan 2023 #5719

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Your feedback

Focusing growth

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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

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

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

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

Other feedback

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

Future Development Plan 2023 #5752

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Your feedback

Focusing growth

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

Disagree

Tell us why
Roads are hell

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
Common sense

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

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

Other feedback

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

Future Development Plan 2023 #5767

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Your feedback

Focusing growth

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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?

Disagree

Tell us why

Existing infrastructure is significantly under capacity for projected growth and very expensive to alter/ renew economically to cater for required growth.

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

Population density in the correct areas assists in providing economy of scale & demand for new development of modern, efficient economies & communities. That cannot be economically achieved just through modifying existing infrastructure.

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

For coastal zones as example, managed retreat may be the solution. There is a need for site specific solutions. New developments needs to manage, mitigate or avoid known hazards i.e floodplains.

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?

Other

Tell us why

Nature based infrastructure i.e wetlands need to be used for a balanced" solutions. Final outcomes need to be specific to it's location & recognize impact of a variable climate.

Other feedback

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

Refer attached. I support the identification of the Silverdale West/Dairy Flat/ Wainui areas as being suitable for further investigation to meet Auckland's projected growth.

Wondershare PDFelement

SUBMISSION

AUCKLAND COUNCIL FUTURE DEVELOPMENT STRATEGY JUNE 2023

My name is ..... and I am a resident of the Silverdale West /Dairy Flat/North Auckland area and am directly affected by the proposed changes outlined in the Future Development Strategy(FDS) as proposed.

Firstly, I am objecting to the time frame set down for understanding, without any dialogue or public consultation by both Auckland Council and Auckland Transport on such an important matter. The FDS is proposed to replace the Future Urban Land Supply Strategy, which required extensive community wide consultation and modification to respond to the communities needs. The FDS is now railroading the process, on a completely different basis, completely ignoring any prior feedback or input.

Further time and supporting material for the Council and AT proposals needs to be provided including full community engagement.

I request that proper community engagement process is the first step i.e community meetings etc.

Intensification historically has resulted in some very poor outcomes for Auckland, including recent loss of life , due to poor planning and lack of capacity. Proper cost benefit analysis is required to identify the true cost of intensification versus greenfields development in Auckland.

Greenfield development must be included in the proposal with emphasis on areas that have a plan to create sustainable communities, including infrastructure and employment opportunities and making allowance for current and future environmental effects i.e avoid flood plains.

I support the identification of the Silverdale West /Dairy Flat/Wainui areas being suitable for further investigation , but object to the timing deferral . These areas were initially meant to be "developer ready" by now, under the initial FULSS provisions.

I do not support devolving Auckland into a third world city due to poor planning for growth.

Regards

.....

Dairy Flat

Future Development Plan 2023 #5771

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Your feedback

Focusing growth

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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

We need more houses in the neighbourhood Mangere

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

I agree more investment my community Mangere

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

Focus on flood and build stronger homes

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

We need safer homes (prevent disaster is key)

Other feedback

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

Future Development Plan 2023 #5774

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Your feedback

Focusing growth

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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
We need more home in my neighbourhood.

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
More funding for community and local businesses.

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
We need to prevent floods and earthquakes.

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
We need safe and strong homes

Other feedback

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

Future Development Plan 2023 #5775

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Your feedback

Focusing growth

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

Agree

Tell us why

We need more homes for families.

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

More investment to local community & business

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

We need to prevent flooding and earthquake

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 Plan 2023 #5777

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Your feedback

Focusing growth

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

Agree

Tell us why
We need more homes in my neighborhood

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
More funding for community and local business.

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
We need to prevent floods

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
We need safe and stay homes

Other feedback

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

Future Development Plan 2023 #5778

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Your feedback

Focusing growth

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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

Auckland has expanded to include other areas which previously were outside Auckland but now part of it, so public utilities services are still not enough, and need to be extended as more hospital, schools, recreation parks etc.

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

Needs to be expanded these facilities described above

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 Plan 2023 #5779

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Your feedback

Focusing growth

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

Agree

Tell us why

Accessible local centres

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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

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.

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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?

Agree

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?

Agree

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 Plan 2023 #5780

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Your feedback

Focusing growth

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

Agree

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?

Agree

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?

I don't know

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?

Agree

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 Plan 2023 #5783

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Your feedback

Focusing growth

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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

As they are a lot of peoples living here in Auckland that's why we need more plan for resident to live. So that we peoples won't be just in one place.

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

So that people will have more chance to suggest their opinion.

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

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

Other feedback

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

I would like to Auckland Council to develop more and focus more on highway and roads as there are very bad traffic going on. It is been too busy and most of us spend too much time on road. I would like them to focus more on this.

Future Development Plan 2023 #5784

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Your feedback

Focusing growth

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

Agree

Tell us why

We want more houses in our neighbourhood

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

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

Resilient infrastructure

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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

Other feedback

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

Future Development Plan 2023 #5785

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

Agree

Tell us why

Accessible local centres

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

Agree

Tell us why

Avoiding hazards

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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?

I don't know

Tell us why

Resilient infrastructure

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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?

Disagree

Tell us why

Other feedback

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

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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

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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

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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?

Agree

Tell us why

Resilient infrastructure

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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?

Agree

Tell us why

Other feedback

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

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

Agree

Tell us why

Accessible local centres

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

Agree

Tell us why

Avoiding hazards

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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?

Agree

Tell us why

Resilient infrastructure

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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?

Agree

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 Plan 2023 #5789

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Your feedback

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

Agree

Tell us why

Better public transport

Infrastructure
Clean the streets please

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

Invest in local communities

Clean the streets (Begbie Place)
Cut grass regularly/ frequently

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.

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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?

Agree

Tell us why
Better drainage system

Resilient infrastructure

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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?

Agree

Tell us why

Focus on quality & durability
Make it affordable

Other feedback

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

Lower taxes

Future Development Plan 2023 #5792

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Your feedback

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

Agree

Tell us why

We want more houses in our neighborhood.

Accessible local centres

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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

I agree more investment my community

Avoiding hazards

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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?

Agree

Tell us why
Focus on flood response

Resilient infrastructure

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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?

Agree

Tell us why
We need safe names

Other feedback

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

Future Development Plan 2023 #5795

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Your feedback

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

Agree

Tell us why

More housing to meet peoples demand

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

Avoiding hazards

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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

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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 Plan 2023 #5797

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Your feedback

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

Agree

Tell us why

Accessible local centres

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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

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.

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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?

Agree

Tell us why

Resilient infrastructure

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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?

Agree

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 Plan 2023 #5801

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Your feedback

Focusing growth

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

Tell us why

More affordable housing, and more affordable childcare.

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?

I don't know

Tell us why

This may work, but we need better transport infrastructure to get to and from work - which in most cases will not be in the local area you live in.

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

General clean up of waterways on regular basis will help too

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

Neutral

Other feedback

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

Future Development Plan 2023 #5808

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Your feedback

Focusing growth

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

Agree

Tell us why

Need more activities for parents and their children

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

Need more funding for local business in our area

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

Need more home for families of 8,9,10,11 and more

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

Help prevent future floods coming into to home of all people.

Other feedback

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

Your doing an amazing job already. Keep it up

Future Development Plan 2023 #5809

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Your feedback

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

Agree

Tell us why

We need more homes for families

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

More investment to local community and business

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

We need to prevent flooding and earthquake

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?

Agree

Tell us why

We need strong homes

Other feedback

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

Future Development Plan 2023 #5812

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Your feedback

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

Agree

Tell us why

More fueling to locals

Accessible local centres

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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

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.

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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?

I don't know

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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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

Other feedback

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

Rural areas should grow more than inside closer to city expand more.

Future Development Plan 2023 #5820

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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

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?

Disagree

Tell us why

A centre is important, but instead of putting everything near a centre, the council should equally spread businesses and facilities around the area, meaning people from everywhere, not only the centre, will have access to necessarily services within a short distance. This would allow people living at the edges or deep into the area to access necessary services easier.

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

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

Other feedback

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

Future Development Plan 2023 #5832

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Your feedback

Focusing growth

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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

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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.

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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

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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?

We strongly disagree and oppose the proposed FDS rules for our area (Whenuapai) and believe the current FULSS rezoning timeframe of 2028 - 2032 should remain. Especially given our proximity to NorthWest and local infrastructure.

Future Development Plan 2023 #5840

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Your feedback

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

Disagree

Tell us why

Accessible local centres

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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

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.

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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?

Agree

Tell us why

Resilient infrastructure

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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?

Disagree

Tell us why

Other feedback

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

Need prepare for the storms which came from climate change.

Also need more infrastructure include. Round extensions. So much car traffic in Auckland.

Future Development Plan 2023 #5845

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Your feedback

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

I don't know

Tell us why

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

I don't know

Tell us why

Avoiding hazards

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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?

Agree

Tell us why

Sometimes I find that keep the gardens cleans were sometimes I pick up glass were within. Plastic, cardboard, boxes are sometimes going back to the/ that I no/ as much that card board, paper.

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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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

Other feedback

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

Try to keep clean were rubbish, say do you ever see plastic. Thrown rubbish there is glass were something creative, say art, say a painted bottles say is this a shop hooker, say something that takes your interest artistic bottles does this make you want to by fastfoods, ie fishing/does this make you was fish say painted bottles.

Future Development Plan 2023 #5846

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Your feedback

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

Disagree

Tell us why

Disagree strongly - e.g on Waiheke Island.
Housing consents - for small houses for example are prohibiting expensive - Local people can't afford them, large new estate owners are creating a community infrastructure imbalance. Water run-off from excessive stop dives creates serious, sometimes dangerous, flooding + road erosion - The local community understood the water runs off cleaned drains etc. Downers + city council don't.

Accessible local centres

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

Agree

Tell us why

Agree if planning really understands where local centres are. e.g on Waiheke ostend had been as the best admin duct. Now the city council moving it's activities to oneroa - difficult parking, more distance from developing eastern end of the island etc.

Avoiding hazards

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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

Excellent town/city/ area planning is needed. I believe from discussions with planners that those have been excellent plans unable to proceed/be completed because of undue beaurocracy

Resilient infrastructure

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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?

Agree

Tell us why

Other feedback

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

Let local boards have more autonomy. Representatives on the overall greater area (city) council for larger area planning, but a greater responsibility for looking after their own communities.

More difficult in the urban environment, but very necessary in geographically well-defined area.

Future Development Plan 2023 #5848

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Tell us why

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

Tell us why

Avoiding hazards

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Tell us why

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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

These photos and films are of the Browns bay sewage pumping station spewing raw sewage into the creek at the south end of Browns bay and flowing down into the sea and onto the beaches. The others are sewage manhole lids under pressure spewing raw sewage on to Waiake beach road in front of the Torbay yacht club and the other is Riwi street . The photo looking back to Browns bay , Rothesay bay and all the bays shows the silty water mixed with sewage at least 2 to 3 kilometres off the coast . This is killing and poisoning all the Marina life in the Hauraki gulf. Where are all the health and safety people of the council and what are they doing . In that raw sewage is fecal coliforms and other pathogenic organisms and heavy metals

Other feedback

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

From:
Sent: Wednesday, July 12, 2023 11:06 AM
To: Future Development Strategy <futuredevelopmentstrategy@aucklandcouncil.govt.nz>
Subject: Stop all infill apartments and housing on the north shore and east coast bays you are polluting and killing everything

Download full resolution images
Available until 11/08/2023

These photos and films are of the Browns bay sewage pumping station spewing raw sewage into the creek at the south end of Browns bay and flowing down into the sea and onto the beaches. The others are sewage manhole lids under pressure spewing raw sewage on to Waiake beach road in front of the Torbay yacht club and the other is Riwi street . The photo looking back to Browns bay , Rothesay bay and all the bays shows the silty water mixed with sewage at least 2 to 3 kilometres off the coast . This is killing and poisoning all the Marina life in the Hauraki gulf. Where are all the health and safety people of the council and what are they doing . In that raw sewage is fecal coliforms and other pathogenic organisms and heavy metals



Future Development Plan 2023 #5878

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

Agree

Tell us why

Accessible local centres

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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

Avoiding hazards

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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

Resilient infrastructure

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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?

Agree

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 Plan 2023 #5889

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

Disagree

Tell us why

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

Disagree

Tell us why

Avoiding hazards

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Disagree

Tell us why

Resilient infrastructure

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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?

Disagree

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 Plan 2023 #5890

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Disagree

Tell us why

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Disagree

Tell us why

Avoiding hazards

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Disagree

Tell us why

Resilient infrastructure

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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?

Disagree

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 Plan 2023 #5892

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

Disagree

Tell us why

Accessible local centres

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

Disagree

Tell us why

Avoiding hazards

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Disagree

Tell us why

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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?

Disagree

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 Plan 2023 #5899

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Your feedback

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Tell us why

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

Agree

Tell us why

Aagree

Avoiding hazards

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Tell us why

Other feedback

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Future Development Plan 2023 #5906

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Agree

Tell us why

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

Agree

Tell us why

Access to shops,walking to bus stops

Avoiding hazards

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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?

Future Development Plan 2023 #5911

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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

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

Accessibility to people

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 Plan 2023 #5917

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Your feedback

Focusing growth

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

Agree

Tell us why

Accessible local centres

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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

Agree

Avoiding hazards

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

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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

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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 Plan 2023 #5918

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Your feedback

Focusing growth

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

Agree

Tell us why

Accessible local centres

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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

Agree

Avoiding hazards

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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

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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?

Future Development Plan 2023 #5947

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Your feedback

Focusing growth

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

Agree

Tell us why

Accessible local centres

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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

Allows economic growth and engances care for the environment

Avoiding hazards

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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

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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?

Future Development Plan 2023 #5948

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Your feedback

Focusing growth

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

Agree

Tell us why

Accessible local centres

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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

As a mother of eight kids, it will benefit me to have everything nearby so we don't have to travel very far. I certainly support everything that is financially feasible, especially since our weekly budget is tight because so much money is spent on transportation and petrol.

Avoiding hazards

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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

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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?

Future Development Plan 2023 #5977

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Your feedback

Focusing growth

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

Agree

Tell us why

Accessible local centres

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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

Cheaper and way easier

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.

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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

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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?

Future Development Plan 2023 #5979

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Your feedback

Focusing growth

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

Agree

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?

Agree

Tell us why

Close to shops

Avoiding hazards

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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

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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?

Future Development Plan 2023 #5980

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Your feedback

Focusing growth

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

Agree

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?

Agree

Tell us why

Close to shops, public transport

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.

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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 Plan 2023 #6010

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Your feedback

Focusing growth

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

Agree

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?

Agree

Tell us why

Easy access

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.

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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

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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 Plan 2023 #6015

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Your feedback

Focusing growth

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

Agree

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?

Agree

Tell us why

Easy access to services make a huge difference to peoples daily activities.

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.

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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

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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?

Future Development Plan 2023 #6036

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Your feedback

Focusing growth

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

Agree

Tell us why

Accessible local centres

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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

Enable people to walk rather than driving

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.

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Tell us why

Resilient infrastructure

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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?

Future Development Plan 2023 #6333

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Your feedback

Focusing growth

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

Agree

Tell us why

Accessible local centres

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

Agree

Tell us why

Handy and close to shops

Avoiding hazards

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Resilient infrastructure

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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?

Future Development Plan 2023 #6341

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Your feedback

Focusing growth

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Agree

Tell us why

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

Agree

Tell us why

Help the environment

Avoiding hazards

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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?

Future Development Plan 2023 #6350

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Your feedback

Focusing growth

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

Agree

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?

Agree

Tell us why

I agree because I think it's a good idea, reduces costs and worries of gas prices increasing and is easy access to shops.

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 Plan 2023 #6383

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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?

Other

Tell us why

Accessible local centres

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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?

Other

Tell us why

I think depending on the area , shopping and schools and medical facilities should be considered, especially schools! I believe there are way too many property development in an area without consolidating the capacity of the schools available

Avoiding hazards

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Tell us why

Resilient infrastructure

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Tell us why

Other feedback

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Future Development Plan 2023 #6433

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Agree

Tell us why

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

Agree

Tell us why

More Convenient.

Avoiding hazards

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Tell us why

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Tell us why

Other feedback

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Future Development Plan 2023 #6480

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

Agree

Tell us why

More Job opportunities for our community, saving time and money.

Avoiding hazards

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Other feedback

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Agree

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Tell us why

Other feedback

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Agree

Tell us why

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

Agree

Tell us why

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Tell us why

Other feedback

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Agree

Tell us why

Accessible local centres

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

Agree

Tell us why

More Job opportunities for our community, saving time and money.

Avoiding hazards

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Other feedback

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Future Development Plan 2023 #6543

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Agree

Tell us why

Accessible local centres

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

Agree

Tell us why

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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 Plan 2023 #6545

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Agree

Tell us why

Accessible local centres

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

Agree

Tell us why

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Tell us why

Other feedback

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Future Development Plan 2023 #6547

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Agree

Tell us why

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Tell us why

Other feedback

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Other feedback

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Tell us why

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Other feedback

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

Agree

Tell us why

The more accessible it is the more likely people will use the services

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 Plan 2023 #6661

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Your feedback

Focusing growth

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

Other

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?

Other

Tell us why

This is too broad a question. For instance, no one wants packed-in-housing like what's going on today. If tye question above means sacrificing children's playgrounds, and other important venues, then forget it, because it's doing more harm than good. "Housing" shouldn't be tiny boxes where whole families live like sardines in a tin. People also need space and privacy. Please cease treating people as a combined group for mass moving into an architects design, or a jigsaw puzzle

that must fit together for a pretty picture. We are individuals as part of a whole in a society that needs more kindness and caring, not bulking together into one unit. Thank you for listening.

Avoiding hazards

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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

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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 Plan 2023 #6682

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Your feedback

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

Agree

Tell us why

Accessible local centres

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

Agree

Tell us why

Totally useful

Avoiding hazards

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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

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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?

Future Development Plan 2023 #6702

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Your feedback

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

Agree

Tell us why

Accessible local centres

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

Agree

Tell us why

With fewer and better transportation options, easy access will be the most cost-effective choice for everyone. It will also be good for the environment. Programmes based on community funding are properly distributed, especially to those in need.

Avoiding hazards

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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

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Tell us why

Other feedback

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Future Development Plan 2023 #6725

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Your feedback

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

Agree

Tell us why

Accessible local centres

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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

Yes, I like the idea of walking and cycling everywhere, with everything close by. I also like to have businesses and services and houses within the community .

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.

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Tell us why

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Tell us why

Other feedback

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Future Development Plan 2023 #7096

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

Agree

Tell us why

Accessible local centres

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Agree

Tell us why

Avoiding hazards

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Tell us why

Other feedback

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Tell us why

Other feedback

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Other feedback

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Tell us why

Other feedback

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Future Development Plan 2023 #7100

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Tell us why

Other feedback

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Tell us why

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Tell us why

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Tell us why

Other feedback

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Future Development Plan 2023 #7102

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Your feedback

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Other feedback

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Other feedback

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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 Plan 2023 #7120

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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

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

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

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Other feedback

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Future Development Plan 2023 #7121

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Future Development Plan 2023 #7140

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Tell us why

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Other feedback

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Other feedback

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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

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.

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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?

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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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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 Plan 2023 #7186

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Your feedback

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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.

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Other feedback

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Disagree

Tell us why

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Disagree

Tell us why

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Future Development Plan 2023 #7232

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Disagree

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FUTURE DEVELOPMENT STRATEGY

SUBMISSION BY THRIVING DEVELOPMENTS LTD: PAERATA

19 July 2023

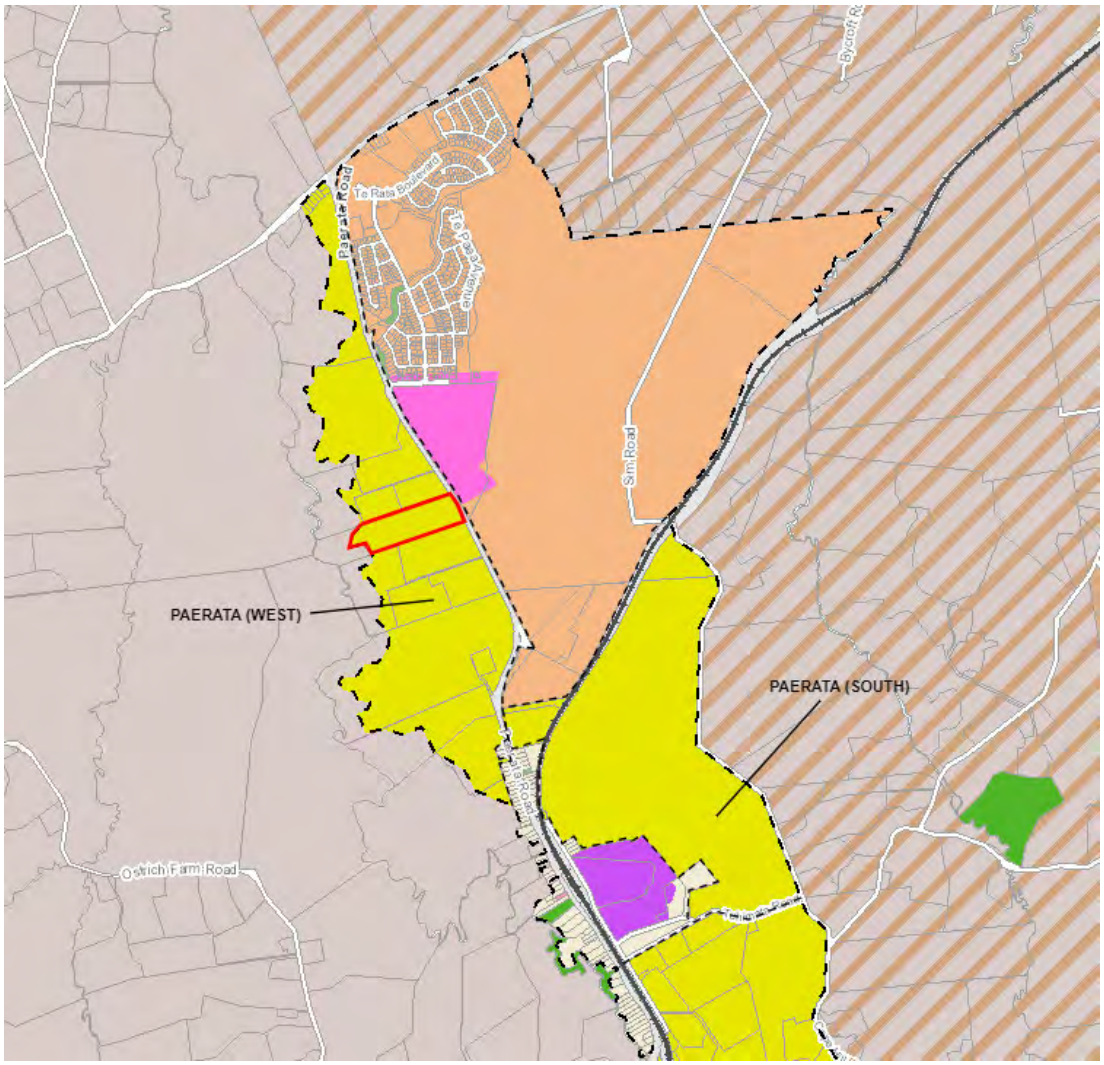
1. Submission

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

Thriving Developments owns the land at [redacted]. The submitter land is in the Paerata West block

The map below shows the land holdings of the landowner.

Diagram 1: Land Ownership



2. Summary of Submission

The submitter strongly opposes the FDS both generally and in particular as it relates to the Paerata area. In the submitters' view, the FDS:

a. Fails to take into account key planning infrastructure and financial matters relating to the Paerata 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. 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).

The Paerata 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 submitter has significantly invested in the future development of this land on the basis of Council's planning documents including the Auckland Plan, the AUP, the Future Urban Land Supply Strategy 2017 (FULSS) which directs Paerata to be 'development ready' by 2018-2022, and the Pukekohe - Paerata Structure Plan 2019.

The Paerata area is suitable, appropriate and ready for development.

The submitter's requested relief is detailed at the end of this submission. In short, they seek that the FDS be amended to include Paerata as a strategic growth area to be development ready in the 2023-2028 time period.

The structure of this submission is as follows:

a. Summary of Paerata ;
b. Submissions on the FDS generally;
c. Submissions on the FDS's approach to Paerata :
    i. Transport
    ii. Infrastructure Funding
    iii. Natural Hazards
    iv. Stormwater
    v. Climate Change
d. Impacts of changing Auckland's growth strategy including approach to the Rural Urban Boundary

e. Requested decision.

A PAERATA

3. Paerata

Paerata is zoned Future Urban in the AUP.

The FULSS identifies Paerata to be developed in two stages. The first is the Wesley College block which is already live zoned and being developed. The second stage is the rest of Paerata identified as being 'development ready' by 2018-2022.

It is included in the Pukekohe-Paerata Structure Plan which was adopted in 2019.

The Council has not promoted the plan changes to give effect to the Structure Plan.

The Crown and Waka Kotahi have funded and commenced or finished work on:

- The intersection upgrade of the SH22 / Glenbrook Road round about
- Electrification of rail to Pukekohe
- The Paerata rail station.

The FDS delays this timing to 2030+ for Paerata South and 2040+ for Paerata West. The stated reason for this is a timing change due to the provision of infrastructure.

B GENERAL SUBMISSIONS

4. 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 the Pukekohe- Paerata Structure Plan.

The effect of the FDS is to fundamentally slow down, defer or remove future greenfields 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, as detailed later in this submission. 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, 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).

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 greenfields expansion, and growth of Townships including Paerata.

(c) This has been consistently reinforced through the Auckland Plan, Auckland Unitary Plan, FULSS, and various Structure Plans including the Pukekohe - Paerata Structure Plan.

(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) 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'.

(f) 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.

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

- Further constraining residential and employment land supply.
- 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.

(h) 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 greenfields 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.

(i) 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.

(j) In terms of capacity assumptions, the draft 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. 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) In addition, the draft 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.

(l) 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.

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

(n) 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 greenfields development.

(o) The FDS relies heavily on urban consolidation which in turn relies on Plan Change 78 but:

- The Council has deferred Plan Change 78 one year.
- It is premature to deal with the FDS when PC78 is so uncertain.

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

(q) 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 greenfields 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) 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.

6. **Plan Change 78**

(a) The Council seems to be relying heavily on Plan Change 78 to provide for growth in the short term. Plan Change 78 relies heavily on the Resource Management Amendment Act 2022.

(b) It is inappropriate and unwise to rely on a plan change which is still yet to have its hearing stage, and where the Council has cast significant doubt on the appropriateness of the notified provisions by advising that almost every topic need to be revisited following natural hazard assessments.

(c) There must also be uncertainty as to the future of the plan change given the divergent political views at national level over the degree of compulsion and growth. Both the

Labour and National parties have come out recently saying they will either revisit or repeal the Medium Density Residential Standards.

(d) Already the Council has slowed down this plan change process by one year. 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.

7. **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 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) 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.

8. **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 greenfields 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.

9. **Natural Hazards are Already Adequately Controlled**

(a) 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.

(b) 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.

(c) There is no urgency to hurry through a rushed 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.

(d) 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.

(e) 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.

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

(a) The submitter accepts 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 industry 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.

C. SUBMISSIONS SPECIFIC TO PAERATA

11. **Paerata transport infrastructure**

The Council's background report raises issues with the transport infrastructure as it relates to Paerata. The Council report identifies the following triggers for Paerata:

- Paerata Arterial
- SH22 Safety Improvements

- SH22 Revocation
- Paerata Transmission Wastewater Pumpstation

It is notable that of the three transport infrastructure elements (the fourth relating to wastewater rather than transport), none of these are ultimately funded by the Council.

In terms of transport infrastructure, the single biggest investment in this location is the electrification of the southern rail line from Papakura to Pukekohe. This will provide a significantly enhanced service both in terms of the quality of the journey through enhanced rolling stock, and the removal of the need to transfer at Papakura; as well as the frequency of services.

A significant investment is in the new Paerata station. This station was located to reinforce and service the growing community at Paerata.

It seems a poor planning decision to expend significant investment on this public transport infrastructure, and then constrain the very growth opportunity this station was designed to service.

The other related transport upgrades are the work on State Highway 22. This is a Waka Kotahi expense.

The investment of the roundabout at State Highway 22 and Glenbrook Road is complete.

As development proceeds through Paerata, in the normal manner developments adjoining the road will upgrade road frontages to an urban rather than a rural environment.

The issue with safety improvements and road upgrades can be implemented over the inevitable significant timeframe that the processing of a plan change associated resource consent and then development of land occurs.

In summary, Paerata has long been planned in terms of the transport enhancements. That transport will provide quick connections to Pukekohe and north to South Auckland and the city centre.

Rezoning should be promoted to best underpin this major public investment in transport.

12. **Paerata infrastructure**

The only other reason for deferring the live zoning of Paerata, as stated in the draft FDS, is the wastewater transmission and pump station.

From 1 July 2024, this accountability will pass to the new water entity. It will have the benefit of an increased funding envelope, at least if the government's statements in supporting this reform are achieved.

Even if the provision of the necessary infrastructure is a medium term prospect, modern technology in wastewater management offers alternate efficient and environmentally sound technologies.

The opportunity for the private sector to help address water and wastewater issues with interim solutions pending the final development should all be worked through as part of the plan change process, rather than a blanket decision to defer until 2040 land that should be already zoned for housing.

The committed investment in infrastructure for the region, including the southern wastewater treatment plant, rail electrification, and new station; warrant a joined up approach to providing the infrastructure to maximise the efficiency of these major public investments.

13. **Managing stormwater in Paerata**

The Council's GIS identifies the Paerata area as relatively free of flood plains and other flood risk areas.

The Whangapouri Stream on the western boundary of the Structure Plan area is an important cultural, as well as environmental, waterway. This is within a valley below the Future Urban zoned land, and therefore manages flood risk within the valley and away from the FUZ land.

All stormwater management issues can be successfully dealt with through resource consenting and the provisions of the Auckland-wide policies and standards. These policies and standards have proven workable during the extreme January weather events in Auckland. It was the earlier development areas that suffered from flooding and land stability issues rather than the more recent development under the AUP.

Stormwater can be successfully managed through the Paerata area.

14. **Climate change**

The Pukekohe Paerata area is predominantly about servicing the Franklin area. There is a workforce commuting around the Franklin district to support the rural economy. There is also a workforce travelling north through to other urban areas. This group is well serviced by public transport and the significant investment in rail electrification.

The Auckland Plan, AUP and FULSS all identified a growth strategy for Auckland based on a balanced combination of urban consolidation, greenfields expansion, and township expansion including Paerata.

This recognised, among other things:

- The desire for different people to enjoy different lifestyles.
- The significant economic opportunity and employment generation in the Franklin part of the Auckland Region.

Paerata is part of the extended Pukekohe Paerata township. It provides a variety of lifestyle choices for residents. It provides an economy in its own right within the township as well as its rural servicing support function. It does provide accommodation for people with jobs further north. It also provides an alternate lifestyle choice for people in retirement.

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 interchanges and connections 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. Residents will also include retirees and workers who predominantly or exclusively work from home.

D. WIDER IMPLICATIONS OF FDS

15. **The impact of reversing longstanding Council commitments to growth management**

The role and expansion of Pukekohe - Paerata as a provincial centre within the region has been signalled and reinforced through the Auckland Plan, AUP, FULSS and the Pukekohe - Paerata 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 severally shakes confidence in all of 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 Paerata , the FDS substantially defers that long standing Council commitment. This is done notwithstanding the significant investment in transport infrastructure upgrades to in part service this new population.

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.

16. Understanding the timeframes to get land development ready

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 employment opportunity, and business premises becoming operational and jobs created. Often this can extend out to closer to eight – ten years.

The process typically includes:

(a) Development consultation and adoption of a structure plan – 1 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 – 2 years. The Council plan change on Whenuapai, which was ultimately withdrawn, took 4 years and 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 – 1 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 commissioning of plants 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:

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

The infrastructure cost when services are actually required will come at occupation of the business 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.

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

17. **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 very limited. 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. No public plan changes have been promoted that would

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

give effect to the current growth strategy. Every 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.

E. REQUESTED DECISION

18. The submitters request:

(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, 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, 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) That any new iteration of the FDS include the Paerata west and south areas as a committed growth area.

(h) That the full Paerata area (Paerata west and south) be shown as development ready in the 2023-2028 time period.

Future Development Plan 2023 #7265

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?

I don't know

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?

I don't know

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?

I don't know

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?

I don't know

Tell us why

Other feedback

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

We request that you give thought to where building materials come from, to best support Auckland's growth and development. Our comments are attached. Thank you.

#7265

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21 July 2023

Auckland Council
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Comments on Proposed Future Development Strategy

Thank you for the opportunity to provide feedback on your proposed Future Development Strategy.

About us

Fulton Hogan is proudly locally owned and operated. We are one of New Zealand's largest roading and infrastructure construction companies, employing close to 6000 staff in New Zealand.

Fulton Hogan undertakes numerous activities including:

- Gravel extraction, both within river beds and within land-based quarries/pits;
- Aggregate processing and storage;
- Land use and infrastructure development and maintenance activities, either directly or on behalf of third parties (including roading contracts for the State Highway on behalf of Waka Kotahi, and local roads on behalf of the territorial authority);
- Asphalt and bitumen manufacture and bulk storage;
- Pre-cast concrete manufacture and storage;
- Hazardous substance use, transport and storage; and
- Workshops, transport depots, storage yards, staff offices, and supporting infrastructure (including wastewater, stormwater, and potable water).

The development and supply of construction materials, particularly those which involve aggregate as a base component, is at the core of Fulton Hogan's business.

Importance of aggregates to New Zealand

Construction materials are vital to enable development of housing and infrastructure. All of the major projects listed in Appendix 9 of the "Consultation Draft of the Auckland Future Development Strategy 2023-2025" will require significant volumes of materials like aggregates, concrete and asphalt.

If construction materials are not available (including at a reasonable cost), this has a material effect on the ability of communities to provide for roading, building and other infrastructure that is vital to their needs.

The effects of constraints on the supply chain have been seen through the Covid-19 pandemic. The supply of construction materials is critical to the timely and cost-effective provision of New Zealand's infrastructure and housing.

Contribution to development costs
Because construction materials, including aggregates, are such key components of infrastructure and housing projects, factors that impact on the cost of these materials are likely to have a measurable impact on the overall cost of the project.

Fulton Hogan recently engaged Infometrics to prepare the attached report "Examining aggregates trends in New Zealand". The report examines the importance of aggregates to the economy, how aggregates contribute to infrastructure, construction and housing costs, and how the cost of transporting aggregates requires aggregates to be sourced as close as possible to the project location.

The Infometrics report highlights that aggregates, and construction materials more generally, make up a significant component of the materials and costs of infrastructure projects. The Infometrics report[1] notes that construction materials comprise over 40% of the material input costs for heavy and civil construction projects. Aggregates alone make up over 18% of these material input costs and 5% of the costs of these projects generally.

Because aggregates are low-value but high-volume materials, increases to the transport distance make a significant difference to the overall cost of the material, and therefore to the cost of development.

Contribution to carbon emissions
Because they are generally transported relatively short distances, and need to be distributed to individual construction locations, aggregates are usually transported by road. Increasing the transport distance therefore increases the greenhouse gas emissions associated with the supply.

Importance of providing for aggregate extraction
Unlike many construction materials, aggregates can only be obtained where the rock or sand occurs naturally.

How this relates to the Auckland Development Strategy 2023-2053
Fulton Hogan agrees that strategic planning and development strategy is critical for Tāmaki Makaurau. Construction materials, particularly aggregates, are indispensable for the development and major projects that are planned. We request that aggregate supply be included in the future development strategy, and aggregate resources be considered and protected. This will contribute to the principles of the future development strategy, in particular Principles 3(a) (take a regional view to infrastructure investment and costs) and 3(c) (make investment decisions that deliver on multiple outcomes), as well as Principle 5(c) (Enable enough housing and business capacity to meet future needs), and Principle 1 (Support greenhouse gas emission reduction).

We would be happy to engage with you further on this, if that would be helpful.

[1] Pages 9 and 10

Yours sincerely



Helen Caley
National Resource Consents Planner

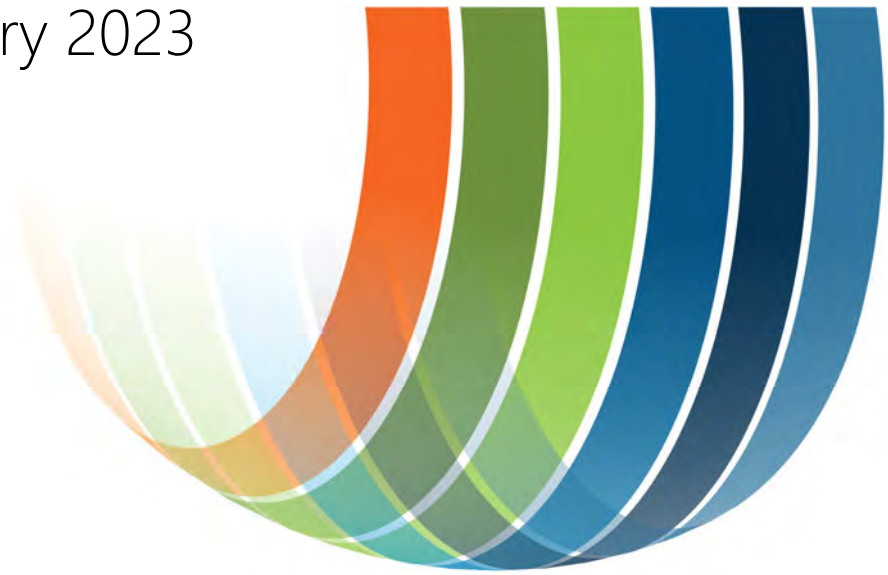
Attachments:
Examining aggregates trends in New Zealand

#7265

Examining aggregates trends in New Zealand

for Fulton Hogan

January 2023



Infometrics

Economics put simply

Authorship

This report has been prepared by Principal Economist Brad Olsen.

Email:

[redacted]

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Executive Summary

Fulton Hogan have asked Infometrics to prepare a report examining the importance of aggregates to the economy, how aggregates contribute to infrastructure and building costs, and how the cost of transporting aggregates requires aggregates to be sourced as close to projects occurring as possible.

This report is expected to be used to support Fulton Hogan's submission on the Natural and Built Environment Bill.

Examining aggregates volumes

- Annual aggregates production averaged 30.6m tonnes over the last decade.
- In 2020, 29.4m tonnes were produced, with a value of $510m.
- Most aggregates are used for roading, with 69% of the total in 2020.
- Underreporting of aggregates production could mean actual production was just more than 100m tonnes higher (+37%) over the last decade.
- Aggregates are produced across the country, and future economic activity is likely to drive demand for aggregates higher.

Examining aggregates' contribution to building costs

- Aggregates make up 18% of materials costs for network infrastructure projects and make up 5% of total costs for these projects.
- Overall, aggregates are the fourth-largest cost by single item for network infrastructure projects, behind civil engineering services, special trade construction services, and metal-based materials.

Examining the cost of transporting aggregates

- Transport costs are a major consideration for aggregates production, as they make up a substantial proportion of the total cost of aggregates.
- To keep transport costs low and manageable, aggregates need to be sourced close to where they are intended to be used on a project.
- Having to transport aggregates beyond 30km in New Zealand adds substantial cost to aggregates, and as a result, most aggregates in New Zealand are not usually transported inter-regionally (except for near-border movements).
- An international study reinforces the view that increasing transport distances for aggregates substantially increases total aggregates costs, with the study showing that increasing the transport distance above 50km doubles the cost of the aggregate required.

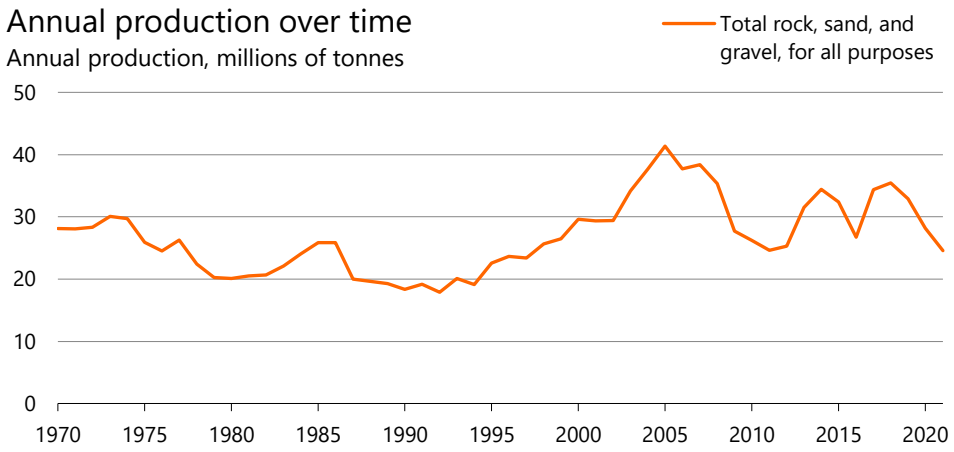
Examining aggregates volumes

There is considerable use of aggregates in New Zealand, primarily for construction efforts in infrastructure and housing. This section details the volume of aggregate produced, what it is used for, where it comes from, and how aggregates use is expected to rise in the future.

Substantial and sustained aggregates needs

Infometrics analysis of aggregates production shows that since 1970, New Zealand production has averaged 26.8m tonnes of aggregates a year. Over the last decade, that average has increased to 30.6m tonnes (see Graph 1).

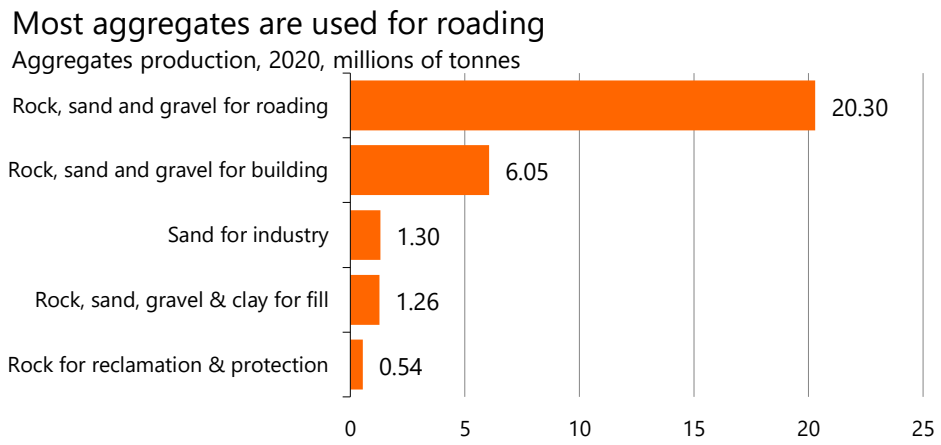
Graph 1



Includes an estimate for 1997, when no data was recorded.

In 2020, the value of aggregates production totalled $510m in nominal terms, with 29.4m tonnes produced. Most aggregates are used for roading, as Graph 2 shows. In 2020, 20.3 of the total aggregates produced were used for roading, 69% of the total.

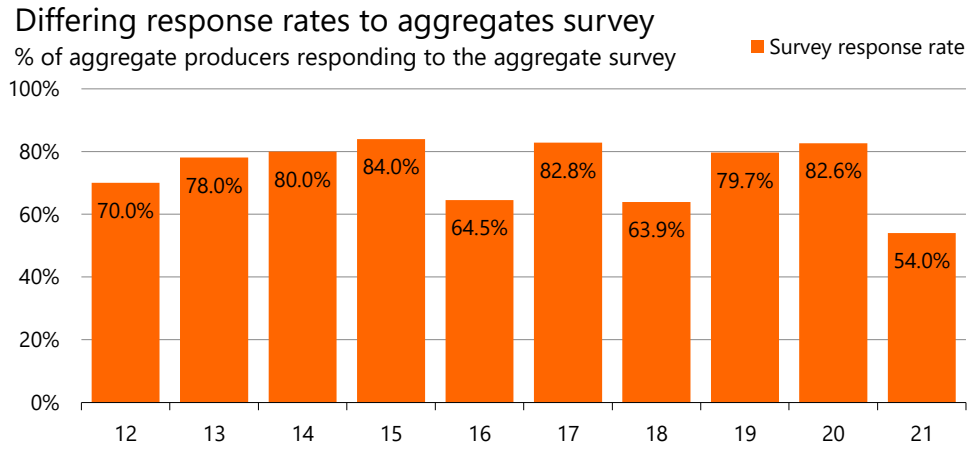
Graph 2



Poor aggregates information means more is needed than what's recorded

However, data in recent years is likely to underrepresent the total amount of aggregates produced. Aggregates data is produced by New Zealand Petroleum & Minerals, within MBIE, from a survey of quarries across New Zealand. Graph 3 sets out the survey response rate, with the most recent year, 2021, showing just a 54% response rate.

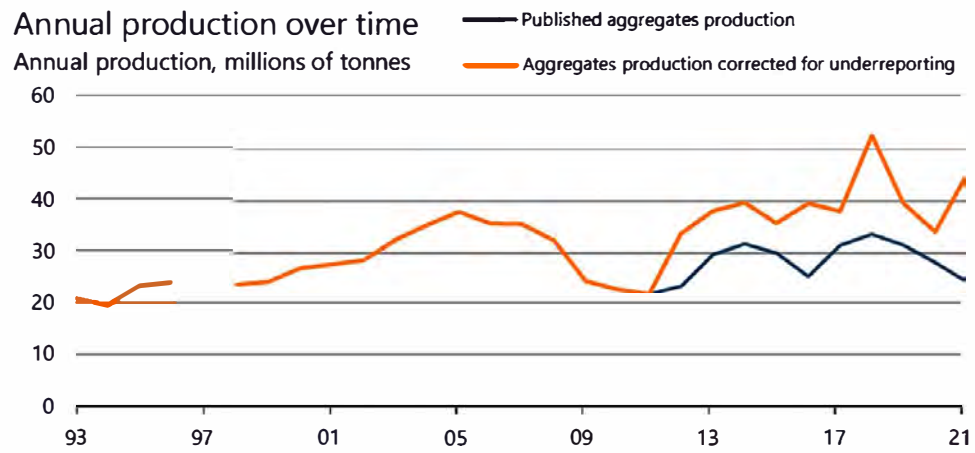
Graph 3



No response rates are published before 2012. The very low response rate in 2021 means that our analysis concentrates on the 2020 result to provide a more comprehensive picture of reported aggregates production.

If the level of aggregates production is upweighted to account for the (sometimes substantial) production underreporting, aggregates production could have been 10.6m tonnes more on average a year (see Graph 4).

Graph 4



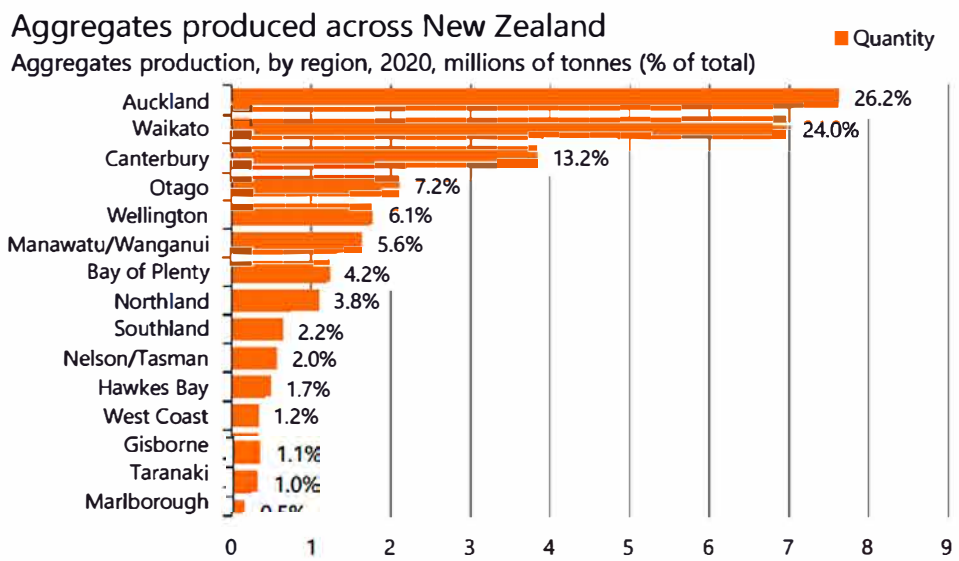
No data was produced in 1997.

Correcting for this underreporting could add over 100m tonnes over the last decade to aggregates production, a 37% uplift. Regardless, both the raw and corrected values show a considerable and sustained level of aggregates use across New Zealand.

Aggregates required across all of New Zealand

Aggregates are currently sourced from across New Zealand, with aggregates usually sourced from as close as possible to where the aggregate is required. The next section on the transport of aggregates details this trend. Infometrics analysis of aggregates production across New Zealand in 2020 shows that Auckland and Waikato account for the largest regional production shares for aggregates, with 50% of total production (see Graph 5). For comparison, the area contributes 43% of New Zealand's population, and 46% of GDP.

Graph 5



However, aggregates are produced across the country, with large levels of production occurring in Canterbury, Otago, Wellington, and the Manawatū. The spread of aggregates production, coupled with the high cost of long-distance transport of aggregates, underscores the importance of maintaining aggregates access across all regions.

However, there are concerns that regional access to aggregates is, and will become, more difficult. A 2022 report for Waka Kotahi noted that *"As city boundaries expand and land development intensification increases the nation's carbon footprint, growing environmental and cultural sensitivities have made it more difficult to operate quarrying businesses close to demand. This has led to the planning and consenting of future aggregate sources taking much longer than before. Regional land use planning and zoning requires secure areas for future aggregate resources."*[1]

Modelling from the same report highlights that aggregates demand levels are positively correlated with increases in Gross Domestic Product (GDP) and roading investment. The 2022 report found that, based on their model of aggregates production and economic activity indicators:

- *"A 10% increase in roading investments from Waka Kotahi and local authorities would boost the production of aggregates by 13%. This result implied that aggregate demand/supply at the national level was significantly influenced by the overall economy and the government's fiscal response. Moreover, aggregate demand/supply increased more than proportionally to the increase in roading investments.*
- *An increase in roading investments and population growth would also increase New Zealand's GDP"*

Although economic activity is expected to contract in the year to June 2024, Treasury expects economic activity to then grow by between 2.1% and 3.3%pa over the next few years, according to the Half Year Economic and Fiscal Update.[2]

Treasury's Long-term Fiscal Model points to a plausible scenario where real GDP increased by 1.6%pa on average between 2026 and 2061.[3]

Taken together, continued economic expansion across New Zealand in the coming decades underscores the need for continued aggregates production, likely at a higher level than is achieved now.

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[1] Wilson, D., Sharp, B., Sheng, M. S., Sreenivasan, A., Kieu, M., & Ivory, V. (2022). Aggregate supply and demand in New Zealand (Waka Kotahi NZ Transport Agency research report 693). Waka Kotahi NZ Transport Agency. Retrieved from https://www.nzta.govt.nz/assets/resources/research/reports/693/693-aggregate-supply-and-demand-in-new-zealand.pdf (accessed 20 January 2023).

[2] Treasury. (14 December 2022). *Half Year Economic and Fiscal Update*. Treasury. Retrieved from https://www.treasury.govt.nz/system/files/2022-12/hyefu22.pdf (accessed 20 January 2023).

[3] Treasury. (September 2021). *Long-term Fiscal Model for He Tirohanga Mokopuna 2021*. Treasury. Retrieved from https://www.treasury.govt.nz/publications/ltfm/long-term-fiscal-model-he-tirohanga-mokopuna-2021 (accessed 20 January 2023).

Examining aggregates' contribution to building costs

Aggregates are a key materials component to the construction sector, in particular for network infrastructure including roading.

Every year, Stats NZ produce detailed weights that outline the proportional price contribution of different goods and services for each industry group, with these weights utilised in the Producers Price Index (PPI).

Infometrics has reviewed the latest set of PPI weights for 2022, and the input commodity "aggregates" is listed as a major material cost input for the "Heavy and civil engineering construction" industry, which deals with network infrastructure construction.

Aggregates are 18% of materials costs, 5% of total costs

As Table 1 outlines below, Stats NZ figures show that aggregates are the second-largest single goods and materials commodity input for the "Heavy and civil engineering construction" industry.

In 2022, Stats NZ PPI weights showed aggregates contributing 5.1% of the total average input price in the "Heavy and civil engineering construction" industry. This figure is 5.1% across construction services, goods and materials, fuel and power, and other related services and expenses.

Table 1

Heavy and civil engineering construction, input costs

Input commodity	Percentage of total input costs	Percentage of materials input costs
Goods and materials	**28.2%**	**100.0%**
Fabricated metal products, excluding machinery and equipment	8.0%	28.4%
Aggregates	**5.1%**	**18.2%**
Articles of concrete, cement, and plaster	4.5%	16.1%
Plaster, lime, and cement	2.7%	9.7%
Plastic and plastic products	1.7%	6.0%
Wood	1.0%	3.7%
Other goods and materials	5.1%	18.0%

Overall, aggregates are the fourth-largest cost by single item, behind civil engineering services, special trade construction services, and metal-based materials.

Looking just at materials costs in the "Heavy and civil engineering construction" industry aggregates make up 18% of the total materials cost for an average network infrastructure job.

Aggregates also required for housing

The amount of aggregates required for housing is uncertain and not well established in New Zealand, with a variety of estimates used.

Previous analysis of aggregates use, using overseas data, suggest that a standalone house requires 400 tonnes of aggregates, and a medium-to-high density building requires 60 tonnes per 100m^2.[4] Unsourced material from the Aggregate and Quarry Association noted in 2019 that "*an average house uses 250 tonnes of aggregate and sand.*"[5]

With an average of around 23,400 standalone house consents issued on average annually since 2020, between 5.9m and 9.4m tonnes of aggregates a year could theoretically be needed, with more needed for the rising level of medium-to-high density buildings.

Although this level of aggregates demanded is larger than actual production, construction in recent times has been limited by supply chain issues, building at levels below the record levels consented, and increasingly are increasing density on already-built areas, all of which would reduce actual levels of aggregates required per dwelling.

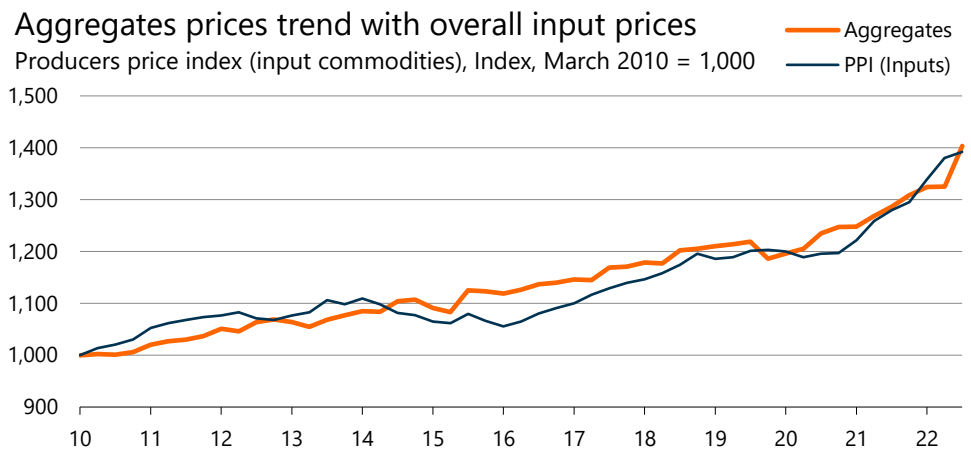
Aggregates have been getting more expensive

Detailed PPI input commodity indexes have only been published for the last decade or so. Infometrics analysis of Stats NZ data is seen in Graph 6 and Graph 7. Graph 6 shows that aggregates prices have generally trended in line with broader business price inputs.

[4] Deloitte, Richard Paling Consulting, Murray King & Francis Small Consulting, and Cooper Associates. (2014). *National Freight Demand Study 2014*. Ministry of Transport. Retrieved from https://www.transport.govt.nz/assets/Uploads/Report/National-Freight-Demand-Study-Mar-2014.pdf (accessed 20 January 2023), based on a 2013 unpublished Market Economic Report.

[5] Scott, W. (2019). *Challenges Facing the New Zealand Aggregates Sector*. Aggregate and Quarry Association. Retrieved from https://cdn.ymaws.com/concretenz.org.nz/resource/resmgr/docs/conf/2019/s3_p4.pdf (accessed 23 January 2023).

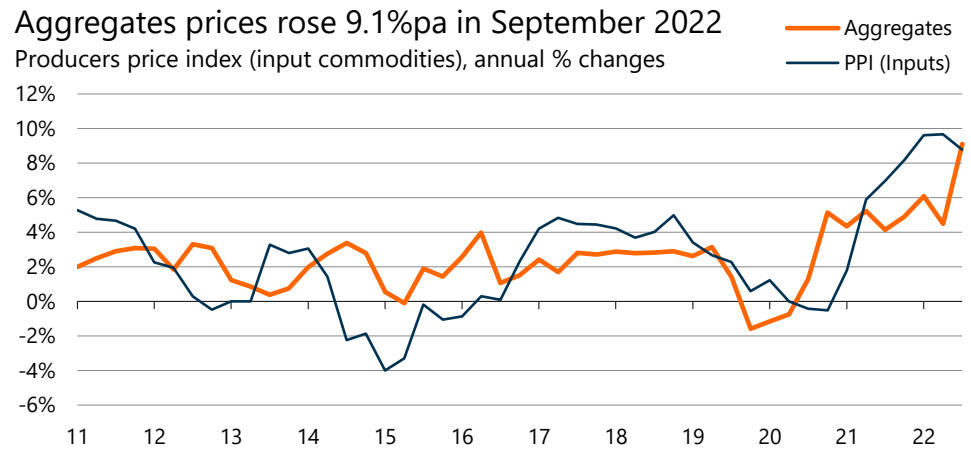
Graph 6



Aggregates price levels rose faster than broad business input prices from around 2015 until late 2019, and then again during 2020-21.

As Graph 7 shows, annual growth in aggregates prices rose faster than broad business input prices over 2020-21, with a recent acceleration towards the end of 2022 as high inflation in general saw many business input price increases head higher or remain high.

Graph 7



Examining the cost of transporting aggregates

Transport costs are a major consideration for aggregates production and can make up a substantial proportion of the total cost of aggregates. Aggregates is a high-volume, low-value commodity.

As a result of these attributes, transport costs are a significant component of overall aggregates cost.[6] The location of aggregates sources close to where the aggregates are required are crucial to keep transport and overall costs low and manageable.

Taken together, the section below makes it clear that transport costs have a significant influence on overall aggregates costs

Most aggregates moved by road

Various editions of the National Freight Demand Study note that aggregates as almost always moved via road, in large trucks. A small amount of aggregates are moved by rail.[7]

The 2014 National Freight Demand Study noted that aggregates are a

> "*bulk product well suited to line haul by rail,* [but] *the short distances transported and distributed destinations make rail impracticable. A study of potential aggregate movement from Huntly to Auckland31 in 2010 found that access to rail at Huntly added cost, as did the need for a distribution terminal in Auckland. While the line haul cost by rail was competitive, the overall move was cheaper by road.*"

A limited amount of aggregates is currently transported by coastal shipping too. A government briefing on coastal shipping notes that "[New Zealand coastal shipping is] *primarily geared towards transporting large, heavy cargoes such as fuel, cement and aggregate and various containerised goods.*"[8]

A 2021 report noted two coastal shipping vessels that move aggregates.[9]

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[6] Walrond, C. (2006). *Rock, limestone and clay – Aggregate.* Te Ara - the Encyclopedia of New Zealand. Retrieved from http://www.TeAra.govt.nz/en/rock-limestone-and-clay/page-2 (accessed 20 January 2023)

[7] Richard Paling Consulting, Murray King & Francis Small Consultancy, and EROAD Limited. (2019). *National Freight Demand Study 2017/18*. Ministry of Transport. Retrieved from https://www.transport.govt.nz/assets/Uploads/Report/NFDS3-Final-Report-Oct2019-Rev1.pdf (accessed 20 January 2023).

[8] Offices of the Minister of Energy and Resource, and Transport. (2022). Retaining or redeploying New Zealand's coastal shipping capability. New Zealand Government. Retrieved from https://www.mbie.govt.nz/dmsdocument/21354-retaining-or-redeploying-new-zealands-coastal-shipping-capability-proactiverelease-pdf (accessed 20 January 2023).

[9] Pacific Marine Management Ltd. (2021). Coastal Shipping Investment Approach Report 1 - State-of-Play. Waka Kotahi NZ Transport Agency. Retrieved from https://www.nzta.govt.nz/assets/resources/coastal-shipping-research/nzta-coastal-shipping-state-of-play-report.pdf (accessed 23 January 2023).

Supply of aggregates from any one quarry is finite, and new quarries and sources of aggregates will be needed.[10] The location of aggregates demand will also shift as different projects are approved and constructed. A wide and shifting range of aggregates origins and destinations means that flexible transport options for aggregates are likely to remain favoured over fixed transport options like rail and coastal shipping.

Aggregates made up 15% of the total freight volume moved around New Zealand in 2018,[11] compared to 11% in 2014,[12] and 26% in 2008.[13]

However, aggregates movements only accounted for between 3% and 13% of the total transport distances carried, given the importance of location for aggregates.

Graph 8

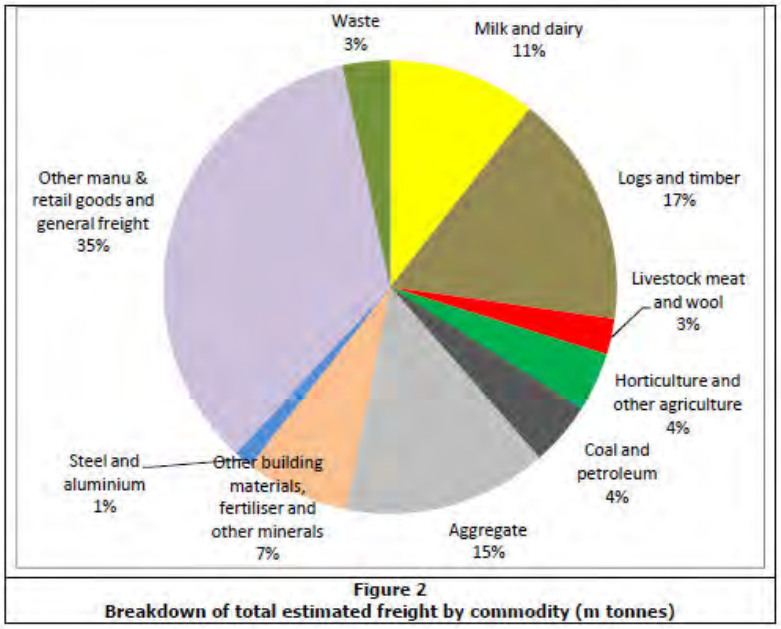


Figure 2
Breakdown of total estimated freight by commodity (m tonnes)

Source: National Freight Demand Study 2017/18

[10] Hill, MP. (2021). Aggregate Opportunity Modelling for New Zealand. GNS Science. Retrieved from https://www.tewaihanga.govt.nz/assets/Uploads/Aggregate-Opportunity-Modelling-for-NZ.pdf (accessed 23 January 2023).

[11] Richard Paling Consulting, Murray King & Francis Small Consultancy, and EROAD Limited. (2019). *National Freight Demand Study 2017/18*. Ministry of Transport. Retrieved from https://www.transport.govt.nz/assets/Uploads/Report/NFDS3-Final-Report-Oct2019-Rev1.pdf (accessed 20 January 2023).

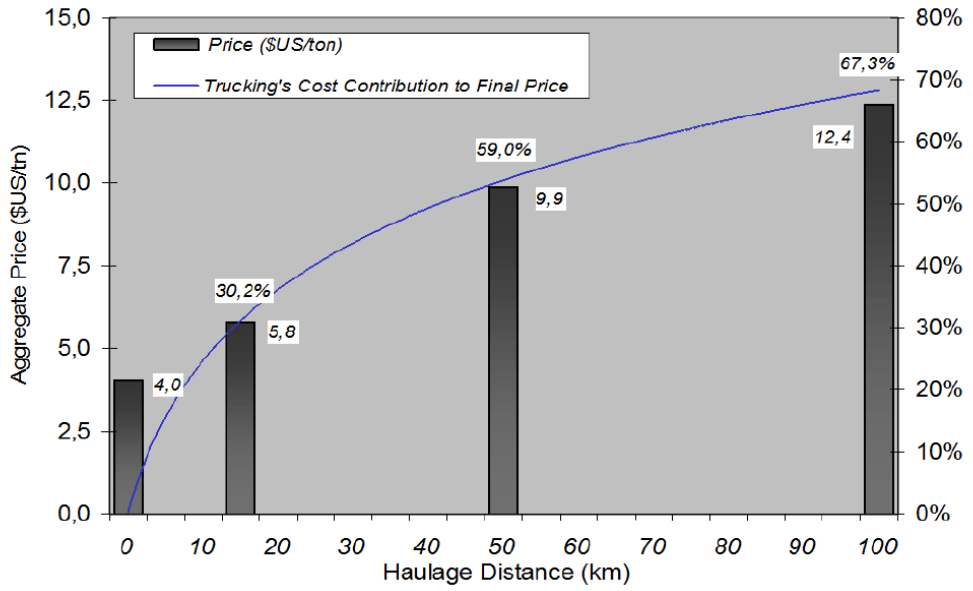
[12] Deloitte, Richard Paling Consulting, Murray King & Francis Small Consulting, and Cooper Associates. (2014). *National Freight Demand Study 2014*. Ministry of Transport. Retrieved from https://www.transport.govt.nz/assets/Uploads/Report/National-Freight-Demand-Study-Mar-2014.pdf (accessed 20 January 2023).

[13] Richard Paling Consulting, IPC & Associates, John Bolland Consulting Ltd, Murray King & Francis Small, and Ascari Partners. (2008). *National Freight Demands Study 2008*. Ministry of Transport. Retrieved from https://www.transport.govt.nz/assets/Uploads/Report/FreightStudyComplete.pdf (accessed 20 January 2023).

Transport costs can contribute more than half the cost at greater distances

International evidence confirms rising transport costs the further away from the source the aggregates has to be moved. A 2000 study from Greece showed that "an increase in the haulage distance, ranging from 50 to 100 km, would result in more than doubling the price of aggregates."[14]

Figure 1



Aggregate price and trucking cost contribution, in relation to the haulage distance.
Source: Kaliampakos & Benardos (2000)

In this study, transporting aggregates 15km from the source sees transport costs contribute around 30% of the overall cost of aggregates material and aggregates transport cost. At 50km, the transport component is 59% of the total cost, and at 100km, the transport component is over 67% of the total cost.

Stylised scenario costs

Applying these proportions to stylised scenarios of New Zealand's aggregates use for building and construction highlights possible cost savings estimates from having aggregates located nearer to where they are demanded.

In 2020, the average value of aggregates used for housing-based purposes ("Rock, sand and gravel for building") was $19.73/tonne. The total quantity of aggregates produced in this category was 6.05m tonnes.

Recognizing the range of distances that aggregates can travel (some closer to their source than others), and with a total quantity of just over 6m tonnes of aggregates used for housing, we have constructed a set of transport cost scenarios to estimate the

[14] Kaliampakos, D. C., and A. G. Benardos. Quarrying and sustainable development in large urban centres: A contradiction in terms? CIM (Canadian Mining and Metallurgical) Bulletin 93, no. 1040 (2000): 86-89.

possible scale of additional cost that having aggregates sources located further away from where they are demanded.

In 1m tonne increments (1m T, 2m T, …, 6m T), we modelled the cost of moving the aggregates volume an average of 50km versus moving the same volume of aggregates an average of 15km.

The scenario analysis suggests additional costs of between $19.9m (for 1m tonnes) and $119.6m (for 6m tonnes) a year to transport aggregates over longer distances.

Table 2

Possible cost differences for housing-based aggregates being transported different distances

Scenario analysis

Scenario	Distance from quarry	Aggregates (T)	Cost of aggregates materals ($/T)	Transport cost %[1]	Original materials cost %[2]	Transport Cost component	Delivered Price	Total cost	Difference	Difference ($m)
1m tonnes	Base case: 15km	1,000,000	$19.73	30.0%	70.0%	$8.46	$28.19	28,191,210		
	Further away case: 50km	1,000,000	$19.73	59.0%	41.0%	$28.40	$48.13	48,131,333	19,940,124	$19.94
2m tonnes	Base case: 15km	2,000,000	$19.73	30.0%	70.0%	$8.46	$28.19	56,382,419		
	Further away case: 50km	2,000,000	$19.73	59.0%	41.0%	$28.40	$48.13	96,262,667	39,880,248	$39.88
3m tonnes	Base case: 15km	3,000,000	$19.73	30.0%	70.0%	$8.46	$28.19	84,573,629		
	Further away case: 50km	3,000,000	$19.73	59.0%	41.0%	$28.40	$48.13	144,394,000	59,820,372	$59.82
4m tonnes	Base case: 15km	4,000,000	$19.73	30.0%	70.0%	$8.46	$28.19	112,764,838		
	Further away case: 50km	4,000,000	$19.73	59.0%	41.0%	$28.40	$48.13	192,525,334	79,760,495	$79.76
5m tonnes	Base case: 15km	5,000,000	$19.73	30.0%	70.0%	$8.46	$28.19	140,956,048		
	Further away case: 50km	5,000,000	$19.73	59.0%	41.0%	$28.40	$48.13	240,656,667	99,700,619	$99.70
6m tonnes	Base case: 15km	6,000,000	$19.73	30.0%	70.0%	$8.46	$28.19	169,147,257		
	Further away case: 50km	6,000,000	$19.73	59.0%	41.0%	$28.40	$48.13	288,788,000	119,640,743	$119.64

1: From Kaliampakos & Benardos, 2000
2: One minus the transport cost

Inter-regional aggregates movement cost-prohibitive

In New Zealand, the 2018 National Freight Demand Study reinforces that transport costs are exorbitant over longer distances. According to the Study, "[i]t costs about the same to transport the material 30km as it does to produce it, and the same transport costs are added for every 30km beyond that. This figure was repeated from the 2008[15] and 2014[16] National Freight Demand Studies.

The *Responsibly Delivering Value – Minerals and Petroleum Resource Strategy for Aotearoa New Zealand: 2019–2029* also noted the same trend:

> "*Houses, roads, bridges and buildings would not exist without aggregates. The crushed rock is expensive to transport (the cost of aggregate doubles in the first*

[15] Richard Paling Consulting, IPC & Associates, John Bolland Consulting Ltd, Murray King & Francis Small, and Ascari Partners. (2008). *National Freight Demands Study 2008*. Ministry of Transport. Retrieved from https://www.transport.govt.nz/assets/Uploads/Report/FreightStudyComplete.pdf (accessed 20 January 2023).

[16] Deloitte, Richard Paling Consulting, Murray King & Francis Small Consulting, and Cooper Associates. (2014). *National Freight Demand Study 2014*. Ministry of Transport. Retrieved from https://www.transport.govt.nz/assets/Uploads/Report/National-Freight-Demand-Study-Mar-2014.pdf (accessed 20 January 2023).

30km of transport) which is why it is important that quarries are located near their end uses."[17]

Inter-regional movements of aggregates in the 2008, 2014 and 2018 National Freight Demand Studies showed very low levels of regional aggregates movements, aside from cross-border aggregates movements over short distances.

Table 3

Table 4.42
Total movements of aggregate 2017/18 (m tonnes)

		Destination														
		North-land	Auckland	Waikato	Bay of Plenty	Gisborne	Hawke's Bay	Taranaki	Manawatu-Wanganui	Wellington	TNM	West Coast	Canter-bury	Otago	South-land	Total
Origin	Northland	1.55	0.06	-	-	-	-	-	-	-	-	-	-	-	-	1.61
	Auckland	-	9.98	0.10	-	-	-	-	-	-	-	-	-	-	-	10.08
	Waikato	-	1.15	6.01	1.11	-	-	0.26	-	-	-	-	-	-	-	8.53
	Bay of Plenty	-	-	-	1.61	-	-	-	-	-	-	-	-	-	-	1.61
	Gisborne	-	-	-	-	0.48	-	-	-	-	-	-	-	-	-	0.48
	Hawke's Bay	-	-	-	-	-	0.96	-	-	-	-	-	-	-	-	0.96
	Taranaki	-	-	-	-	-	-	0.47	-	-	-	-	-	-	-	0.47
	Manawatu-Wanganui	-	-	-	-	-	0.02	0.06	1.88	0.15	-	-	-	-	-	2.12
	Wellington	-	-	-	-	-	-	-	-	1.69	-	-	-	-	-	1.69
	TNM	-	-	-	-	-	-	-	-	-	1.05	0.09	-	-	-	1.14
	West Coast	-	-	-	-	-	-	-	-	-	-	0.13	-	-	-	0.13
	Canter-bury	-	-	-	-	-	-	-	-	-	0.09	0.18	8.67	-	-	8.94
	Otago	-	-	-	-	-	-	-	-	-	-	-	0.11	1.93	0.06	2.10
	Southland	-	-	-	-	-	-	-	-	-	-	-	-	-	0.67	0.67
	Total	1.55	11.20	6.11	2.72	0.48	0.98	0.79	1.88	1.83	1.14	0.40	8.78	1.93	0.73	40.52

Source: National Freight Demand Study 2017/18

The figures in Table 3 show that aggregates usually originate from the same region as the destination of the aggregates or move into a neighbouring region. The difference in stated aggregates by region between Table 2 and Graph 5 are both the different time periods (2020 vs 2017/18), and the different corrections that might have taken place to account for reported figures and underreporting.

[17] New Zealand Government. (2019). *Responsibly Delivering Value – A Minerals and Petroleum Resource Strategy for Aotearoa New Zealand: 2019–2029*. MBIE. Retrieved from https://www.mbie.govt.nz/dmsdocument/7148-responsibly-delivering-value-a-minerals-and-petroleum-strategy-for-aotearoa-new-zealand-2019-2029 (accessed 2 February 2023).

Draft Auckland Future Development Strategy

Interest Group Session 21 July 2023

Introduction

1. My name is [redacted] and I am the Operations Manager for Fulton Hogan Land Development Ltd, where I have been employed for the last 12 years.

2. We (FHLD) are currently developing Milldale in the Wainui Precinct. We are now five years into construction and like most of our developments Milldale is of a reasonable scale (it will include some 4,000 residential units) and includes pre-schools, primary school, local shops, medical facilities and other community services, parks, and other amenities. This will be the last of the live zoned land to be built out in the Silverdale/Orewa area and is on track to be completed by 2030.

3. In recent years we have purchased further land in the Future Urban Zone around Milldale as well as within the Silverdale West Structure Plan Area (identified for Industrial development). We now own some 240ha of Future Urban Zone land in this area purchased on the basis of the Unitary Plan zoning, FULSS, and our knowledge of the infrastructure requirements for the area.

4. We have recently completed a Structure Plan exercise for some 220ha around Milldale (includes land owned by others) and in conjunction with Fletchers have prepared a Plan Change Application for circa 100ha in the Silverdale West area.

Draft Future Development Strategy Impact on the Silverdale/Orewa Area

5. The Draft Future Development Strategy **provides for no new residential growth** in the Sliverdale/Orewa area once Milldale has been completed until at least 2050 albeit that is still subject to further review so it could be later. This is a significant shift to the current position under the FULSS as can be seen on the attached plans (*refer Attachment 1*). Due to the relatively young age of dwellings in the area there is unlikely to be much in the way of infill development occur in this same 20 year period.

6. The reasons included in the FDS for stopping growth in this part of the City are listed as being:

   Increased VKT's
   Natural Hazards
   Infrastructure Upgrades Required

VKT's

7. In terms of VKT's Council own analysis at pages 31-32 of the Growth Scenarios Evidence Report concludes this is not the case. We have also commissioned independent modelling of VKT/greenhouse gas emissions which shows that there will be a **reduction** if additional

residential development is enabled to occur simultaneously with the release of land at Silverdale West.

Natural Hazards

8. In terms of natural hazards, which could only be potential flooding in this location, this assumption is incorrect as well – at least over the 220ha around Milldale which we have already completed flood modelling for. This is consistent with what occurred at Milldale during the Anniversary weekend floods and other recent weather events where the infrastructure performed as expected and coped with the events.

Infrastructure

9. With regard to infrastructure being a reason no development can occur for at least 20 years the situation gets even more bizarre. Attached is the joint Media Release (*refer Attachment 2*) issued by the then Minister of Housing and Urban Development and the Mayor of Auckland when the CIP Infrastructure Agreements were entered into by Crown Infrastructure Partners, FHLD, Auckland Council and Auckland Transport in 2018. This provides a useful overview of the fact that the infrastructure funded and constructed through this agreement was to serve not only Milldale but the Future Urban Zone around it. In addition to these agreements we also entered into a cost share agreement with Watercare for a sewer main around the same time. Please refer to the plan attached labelled 'Wainui Infrastructure Projects' (*refer Attachment 3*)which identifies features I am about to discuss.

Sewer and Water

10. The sewer main (Projects 3 and 4) has been completed which has capacity for both the Future Urban Zone around Milldale as well as the northern portion of the Silverdale West area (the southern portion is in a different catchment and will need to be serviced from the south).

11. In addition we have constructed water mains through Milldale for Watercare (these do not serve Milldale) to serve the Silverdale West area and are currently extending this line for Watercare. We have also constructed other water mains for Watercare which are to connect to a new reservoir on Cemetery Rd. This is to serve planned development in the Future Urban Zone.

12. I recognise that the Army Bay Wastewater Treatment Plant will require upgrades to cope with growth (this would be the case whether this is greenfield or infill), however, this does not appear to be an impediment to growth. In response to questions I had on this facility Watercare directed me to the Watercare Asset Management Plan 2021-2041 (AMP) available on the Watercare website where the following extract can be found at page 67:

"The Army Bay catchment is serviced by the Army Bay WWTP.
Significant future growth areas in this region include Wainui South and Silverdale West. Residential land in Wainui is programmed for immediate development. The structural plan for this area was adopted in 2020, with development expected in the first decade of our

AMP period. These developments will be enabled by staged upgrades across our wastewater network." (The first decade is 2021-2031).

13. Page 86 of the same document identifies that there is $69m allocated to upgrade Army Bay Treatment plant between 2021-2031 and a further $148m between 2031 and 2041. Funding sources are covered at page 102 of the Watercare AMP which include Infrastructure Growth Charges (IGC's) paid on a per household unit basis. At Milldale alone the IGC's will amount to some $68m being paid to Watercare.

14. Given the above it does not appear that the Army Bay Treatment Plant upgrade is reason to stop growth in the Silverdale/Orewa area as proposed by the FDS.

Transport

15. We are currently building a bridge over the motorway between Milldale and Highgate Parkway (Project 5 on the Wainui Infrastructure Projects Plan). Council are contributing $21.8m towards this project as the bridge will serve a much larger area than just Milldale. This contribution was to be recouped by Council through DC's when the surrounding future urban zoned land was developed which now under the FDS won't be for a further 25 years.

16. Over the next two years we will also be constructing the remaining CIP transport projects which Council are also making contributions towards because again they serve a wider area than just Milldale and which were again to be recouped by Council through DC's from development in the Future Urban Zone. Based on the current version of the FDS, these contributions also won't start to be recouped for 25 years.

17. It may be that the people involved with the preparation of the FDS are unaware of the above situation regarding natural hazards and infrastructure as no one sought any information from us or consulted with us whilst preparing the FDS (notwithstanding our multiple requests for meetings with Council officers).

Alternative Proposal

18. There are further transport upgrades required in the area and through the work completed on the Silverdale West Plan Change the Structure Plan around Milldale we have a good handle on what is required. A number of upgrades will be able to funded directly by ourselves and Fletchers (in the case of Silverdale West). In time, others who wish to develop their land will also need to contribute.

19. At a much later stage there will be a need to utilise funds collected by the Government in the form of road user charges and fuel taxes for an upgrade to the Silverdale Interchange. However, our analysis shows that at least 1,600 residential units and 90ha of industrial development can occur before this threshold is reached. The plan change provisions will also ensure that development will not proceed beyond this point unless this funding and infrastructure is in place.

20. In addition to what we are doing in the area the Ministry of Education have purchased land on Upper Orewa Rd for a combined Secondary, Primary and Special School campus. The

services to this site would be delivered by us when we extend the same from Milldale. However, under the FDS this won't happen until at least 2050, if at all, and as such the much-needed secondary school for the area will be delayed until then as well.

21. In the case of Silverdale West, the FDS proposal is that this is delayed from being development ready now (under the FULSS and the relevant Structure Plan) until after all the residential growth in the area occurs – i.e. 2030. This is counter intuitive to the FDS which states that approximately 1,400ha of land is needed in greenfield areas over the short, medium, and long term. It would be better to generate employment opportunities in the area now rather than wait another seven years and it would be very difficult to attract businesses to an area where no growth is occurring. The Silverdale West Industrial Area would be far more likely to succeed if it was happening in conjunction with surrounding residential growth. This also supports FDS Principle 1(c) to "bring people and jobs closer together".

22. Attached is an alternative proposal (*refer Attachment 4*) to that developed by Council staff, who I can only assume are unaware of what the situation on the ground which, will enable employment opportunities to be generated at Silverdale West in the short term and provides for some residential growth between 2030 and 2040 albeit much more restricted than currently provided for under the FULSS.

23. In my view the FDS needs to include some flexibility on the timing of development so solutions are not excluded (the current draft does not provide for any). It is clear from what has been proposed around Silverdale that the Council staff involved are not aware of what is actually happening on ground or what is possible. This is perhaps not surprising as there was no consultation with us and I understand that this has been the case in other parts of the City as well.

[redacted]

July 2023

Attachments:

Attachment 1: FULSS vs Draft FDS

Attachment 2: Joint Media Release

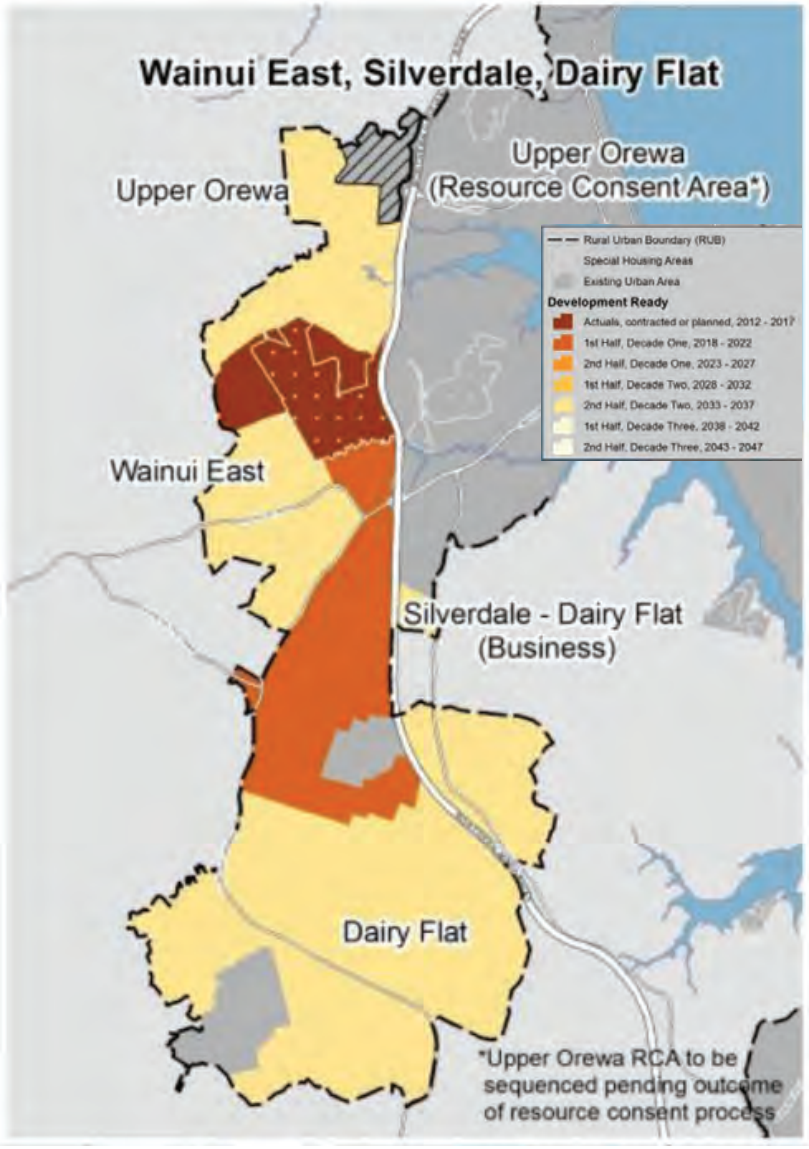
Attachment 3: Wainui Infrastructure Projects

Attachment 4: Alternative sequencing proposal

Attachment 1

FULSS vs Draft FDS

Auckland Future Urban Land Supply Strategy 2017



Map 3: Large future urban areas sequencing and timing.

Draft Auckland Future Development Strategy 2023-2053

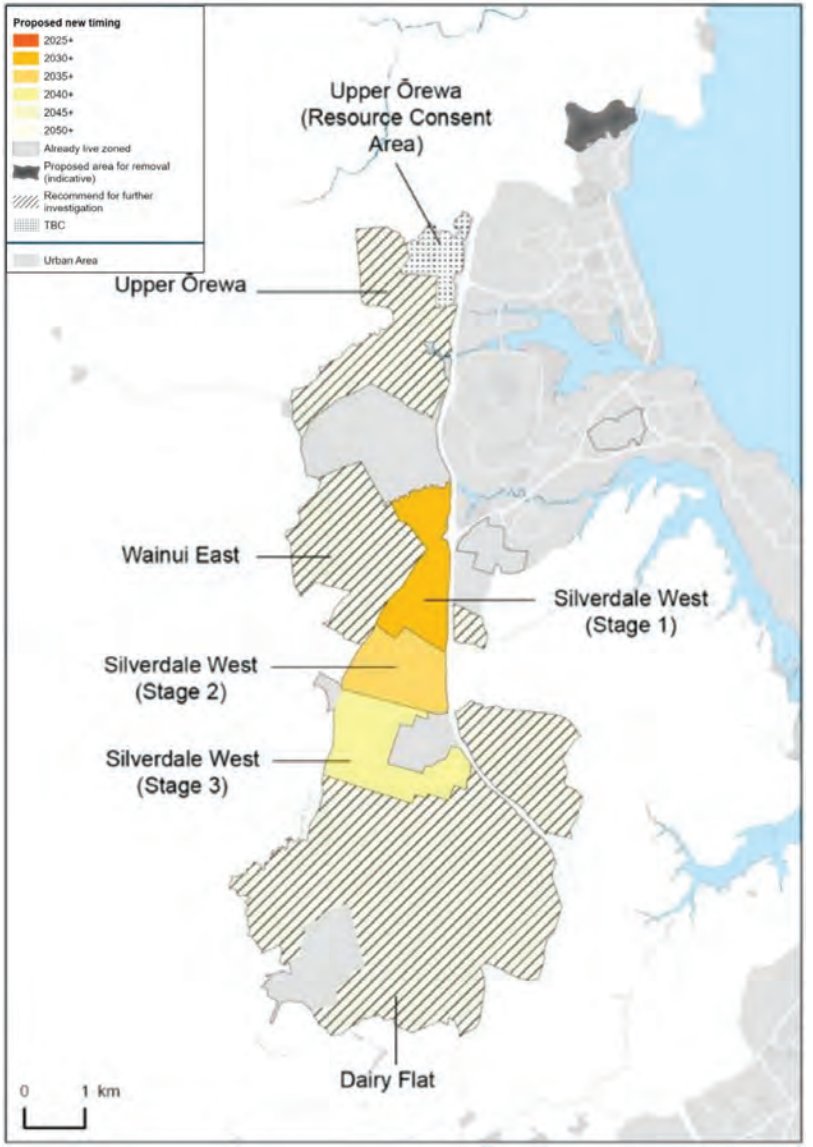


Figure 41 – Proposed timing and approach for Silverdale West, Dairy Flat, Wainui East and Upper Ōrewa future urban areas.

Attachment 2

Joint Media Release

#7265

Hon Phil Twyford

Minister for Housing and Urban Development

Phil Goff

Mayor of Auckland

13 November 2018

MEDIA STATEMENT

Major infrastructure partnership for North Auckland

Minister of Housing and Urban Development Phil Twyford and Auckland Mayor Phil Goff today announced a partnership that will fund $91 million of roading and wastewater infrastructure to support the building of 9000 homes at Wainui, north of Auckland.

The Government Special Purpose Vehicle (SPV) has been created in partnership with Auckland Council, Crown Infrastructure Partners and Fulton Hogan Land Development.

Phil Twyford said the Milldale project demonstrates an approach to funding that allows private investment in new infrastructure with the debt sitting on a balance sheet that is neither the Council's or the Government's.

"The Milldale project is an example of the innovative new approaches to financing infrastructure that the Government is developing through the Urban Growth Agenda. This funding model can be used in other high growth areas affected by the housing crisis to help more houses to be built more quickly.

"This could include private investment in infrastructure funded by a charge on the properties that benefit from the infrastructure.

"This new infrastructure funding model will result in a large number of homes being built much sooner than otherwise would have been the case.

"One of the major road blocks to our towns and cities growing is the lack of ready access to finance for the infrastructure that allows for new urban growth, for green or brownfields developments," Phil Twyford said.

Phil Goff said Milldale will be a great place for Aucklanders keen to live in a new modern eco-friendly environment connected to the rapid transport network.

"A key priority for us in Auckland is to address the shortage and unaffordability of houses in our city," Phil Goff said.

“We’ve zoned much more land for housing, but we need the infrastructure before we can build on it.

“Using Crown Infrastructure Partners to fund that infrastructure enables us to build roads, water and wastewater services without overburdening Council with debt and exceeding our debt to revenue ratio.

“We can build more homes sooner and tackle the housing crisis quicker than would otherwise have been possible.

“This Project enables nearly 4,000 new dwellings in Milldale and the infrastructure can support another 5,000 dwellings in the surrounding areas as well. It’s a big step towards meeting Auckland’s housing needs,” Phil Goff said.

Fulton Hogan Land Development has already started work on the Milldale development at Wainui, which will have nearly 4,000 homes and businesses. The infrastructure being funded will support the Milldale development and will also enable another 5,000 homes to be built nearby, with $33.5 million funding for this being provided by Auckland Council.

Crown Infrastructure Partners has secured long-term fixed-rate debt from Accident Compensation Corporation. The SPV will be funding $48.9 million towards the infrastructure, with the Crown contributing less than $4 million.

The SPV funding will be repaid over time partly by Fulton Hogan Land Development and partly by section owners as an ‘infrastructure payment’ collected with Council rates bills. This new model of infrastructure financing means that long term debt can be raised through the SPV to enable the building of large scale infrastructure, which is needed to step up the rate houses being built, and to assist Councils who are nearing their debt limits.

The Milldale development will be a modern, contained urban development with green spaces and parks, a town centre, cycleways and walkways, and potentially education facilities, and will be connected to the Northern busway.

Fulton Hogan Land Development in conjunction with a joint venture partner has previously developed Millwater, on the eastern side of the northern motorway and sees Milldale as the next evolution of this urban development.

ENDS

Contact: Minister Twyford, Tom James 027 308 6010

Contact: Mayor Goff, Mike Burgess 021 823 936

Note to editors:

- The infrastructure includes a new arterial road and bridge connecting Wainui Road to the Silverdale Interchange and Dairy Flat Highway, intersection upgrades, a roading extension and bridge to Highgate Parkway on the eastern side of the motorway, and wastewater tunnels.

- Construction on the infrastructure has already commenced (the wastewater tunnel) with the first residential sections to be released in the early new year.

- The infrastructure funding and financing pillar of the Urban Growth Agenda will enable responsive infrastructure provision and appropriate cost allocation, including

the use of project financing and access to financial capital. It aims to reform infrastructure funding and financing through:

- Providing a broader range of tools and mechanisms to enable net beneficial bulk and distribution infrastructure to be funded;
- Rebalancing development risk from local authorities to the development sector; and
- Making long term debt finance available to developers willing to take on the commercial risk, with the debt serviced by revenue from the new properties in a development.

Attachment 3

Wainui Infrastructure Projects

#7265

WOODS
Est.1970

Crown Infrastructure Project:		Status:
1A	Weiti Stream Bridge and Arterial Road to Pine Valley Road	Complete
1B	Pine Valley Road to Silverdale Intersection Arterial Road	Detailed Design Complete
2	Wainui Road Argent Lane Intersection Upgrade	Consent in Place
3	Milldale to Millwater Wastewater Tunnel	Complete
4	Milldale to Millwater Wastewater Tunnel Stage 2	Complete
5	Bridge to Highgate Parkway	Construction in Progress

INSTALLED MILLDALE WASTEWATER TUNNEL LENGTH = 1100 m

WAINUI ROAD

LYSNAR ROAD

WATERLOO CREEK

WAINUI BRIDGE

MILLWATER

INSTALLED BRANCH SEWER LINE LENGTH = 2831 m

STAGE 5

STAGE 6

CEMETERY ROAD

RETIREMENT VILLAGE

TOWN CENTRE

STAGE 4

NORTHERN MOTORWAY

PRESCHOOL

STAGE 1

HIGHGATE PARKWAY

OREWA RESERVOIR WATERMAIN

PROPOSED RESERVOIR WATERMAIN EXTENSION LENGTH = 1152 m

INSTALLED RESERVOIR WATERMAIN LENGTH = 316 m

PROPOSED RESERVOIR WATERMAIN TO OREWA 3 WATERMAIN LENGTH = 627 m

PRIMARY SCHOOL

STAGE 2

FUTURE RTN STATION

OREWA 3 WATERMAIN

PROPOSED OREWA 3 EXTENSION TO OREWA 1 WATERMAIN LENGTH = 696 m

PROPOSED OREWA RESERVOIR LOCATION

SILVERDALE WEST BRANCH SEWER LINE

STAGE 3

PRESCHOOL

INSTALLED OREWA 3 WATERMAIN LENGTH = 1393 m

WEITI STREAM

INSTALLED RISING BRANCH SEWER LINE LENGTH = 705 m

ARGENT LANE

WEITI BRIDGE

OLD PINE VALLEY ROAD

PINE VALLEY ROAD

DAIRY FLAT HIGHWAY

LEGEND:	
STAGE BOUNDARIES	
PROPOSED OREWA 3 TO OREWA 1 WATERMAIN	
COMPLETED OREWA 3 WATERMAIN	
PROPOSED OREWA RESERVOIR EXTENSION WATERMAIN	
COMPLETED OREWA RESERVOIR WATERMAIN	
COMPLETED BRANCH SEWER LINE	
COMPLETED RISING BRANCH SEWER LINE	
COMPLETED MILLDALE WASTEWATER TUNNEL	
FUTURE RTN LOCATION	
PROPOSED RESERVOIR LOCATION	
CROWN INFRASTRUCTURE PROJECT	1

SCALEBAR (m) 0 100 200 500

SCALE | 1:10000 @A3 | 1:5000 @A1|

N

DISCLAIMER APPLIES VISIT WEBSITE FOR DETAILS

WOODS.CO.NZ

BUILDING B, LEVEL 1
8 NUGENT ST, GRAFTON,
AUCKLAND 1023
+64 9 308 9229

MILLDALE

MILLDALE

WAINUI INFRASTRUCTURE PROJECTS

STATUS	FOR INFORMATION	
SCALE	1:10000 @ A3	REV 4

P16-269-00-100-SC

Plot Date: 3:37:31 pm,10 July 2023, LEOM

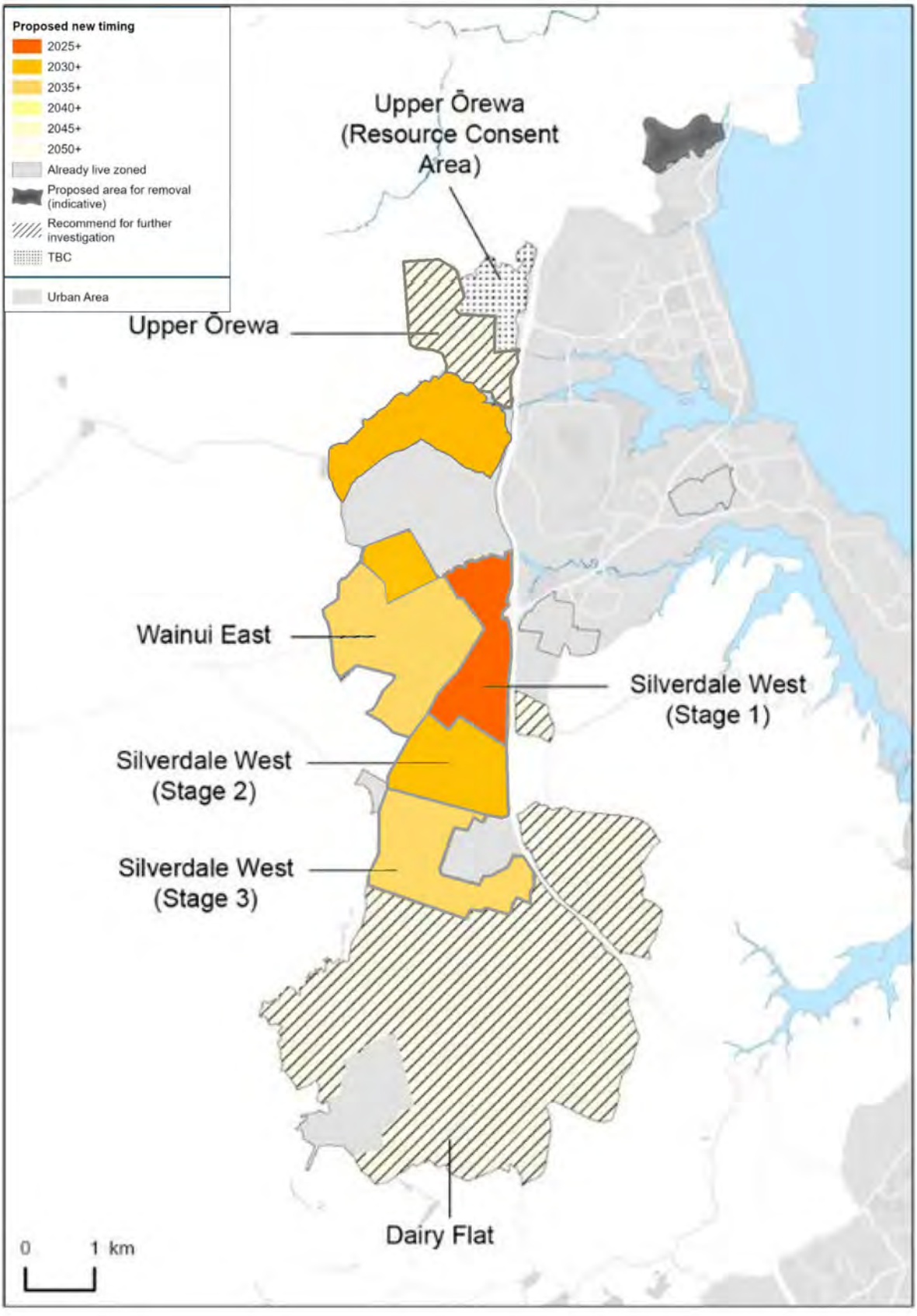
File: C:\12DSYNERGY\DATA\WP-PEN-APP-01\P16-269 - MILLDALE_32\MISC MILLDALE DRAWINGS\P16-269-00-100-SC FDS - WAINUI INFRASTRUCTURE PROJECTS.DWG

Attachment 4

Alternative Sequencing Proposal

Alternative Sequencing Proposal

#7285



Future Development Plan 2023 #7274

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?

Disagree

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?

Disagree

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?

Disagree

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?

Disagree

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 Plan 2023 #7278

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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.

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

Agree

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?

Disagree

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?

Disagree

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?

Disagree

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 Plan 2023 #7293

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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?

Disagree

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?

Disagree

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?

Disagree

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?

Disagree

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 Plan 2023 #7294

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Your feedback

Focusing growth

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

Disagree

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?

Disagree

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?

Disagree

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?

Disagree

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 Plan 2023 #7310

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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?

Disagree

Tell us why

As human beings should be free to choose where and how to live. This should not be decided by bureaucrats and public servants. Compact cities lead to social and cultural problems, homelessness, crimes, dissaffected youth ,loss of liberty and social comfort. We are not robots, and have deep diverse needs we require to meet from our living environments. This should not be ordained from above by mighty civil servants with values, opinions, agendas that our inconsistent with our individual social and biological needs, rights and values.

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?

Disagree

Tell us why

We are not slaves. We are perfectly capable of deciding where to live in a way that is compatible with our needs and values. Your "emissions", CO2, global warming scam is one of the tools that corrupt politicians and others with social agendas are trying to use to remove our freedoms, rights and to exert control on the public. Plants require CO2 to live, we require plants to live for food and healthy environment. CO2 is about 0.04% of the atmosphere. Stop this lie. Live where you like, leave us alone. We do not support agendas frombWEF, United Nations, WHO and other foreign agencies controlling and influencing of our governments and local bodies. We don't want it, we don't need it.

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?

Disagree

Tell us why

There is no climate change threat, apart except for the deliberate Chem trails and weather manipulations by military and governmental agencies. This Global warming scam is used to manipulate and control the public much the same as the covid vaccine scam was and still is used against us. Covid vaccines have been identified as man made Bio weapons, which damage the immune system and have statically increased the death rates of of dieing compared to the unvaxed. Pfizer does not stop transmission of the virus. Pfizer CEO has said this comes directly from the CEO. The fake global warming, is another false and untrue ruse to manipulate and remove freedoms from our people. The global warming scam is just another attempt of Governmental overreach to remove our freedom and rights.

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?

Disagree

Tell us why

Housing shortage is the most pressing problem. They current government made all kinds of promises which they comprehensively failed to keep.

Infrastructure should be based on the best available combination uses of resources. Rather than a global feel good generalization based on political bias and opinion.

"is better able to respond to respond to ongoing change" - this is a universal generalization of someones opinion, that may or may not be true.

What do Engineers say ? Surely we want the best, available combination of options ?

Rather than a one size fits all generalizations based on an unproved political agenda.
Again with the climate change strawman argument. This is a lie globally promoted by WEF and our government to remove freedoms and rights from New Zealand citizens. They know it, we know it. Stop telling lies and promoting fake propaganda.

Other feedback

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

Yes. Tell the truth.

Ask questions

How can we include ...

Where can we include..

Council rates - what is the effect of these private agendas that you are promoting on our rates. Are you going to reduce rates or increase them to bring in these measures ?

You are already overcharging rate payers for anything little thing you do. Property subdivision prices etc are criminal and outrageous.

You are here to serve the people, not to rob and subjugate. Be humble and considerate to the rate payers. Do not overreach. We do not appreciate social engineering for political reasons.

Future Development Plan 2023 #7317

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Your feedback

Focusing growth

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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?

Disagree

Tell us why

More concrete more warming if the city. Auckland needs to look at rooftop gardens and growing plants up their skyscrapers to slow down warming of the city. Singapore is doing this successfully. If urban areas grow they won't be able to cater for demand anymore. There needs to be enough parking at supermarkets etc.. Less density the better for the environment. Every house has to have green around in form of natives, gardens, no concrete or asphalt everywhere. These will Excell global warming. Only more planting of greenery, native bush and gardens will help the issue in cities. How about re purposing exciting buildings which are empty instead?

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?

Disagree

Tell us why

There won't be enough parking for people or access via public transport as it's shocking and not working currently. It's an utopian idea. People want to go shopping where they get the best value for money not where they live. People want to work in jobs they are happy in which aren't necessarily where they live. Scrap the UNs 15min city idea. We the people don't want to live in prisons. We don't want it.

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?

Disagree

Tell us why

Stop spraying chemicals in the sky which alter climate. We know of HAARP. We can see it in the skies. Leave mother nature alone. Replant native bush where it belongs. Support the people living there and help them rebuild their houses. Leave the people alone.

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?

I don't know

Tell us why

Council needs to be working with the people. To me it sounds like driving people out of their homes or more accurately taking their homes away.

Other feedback

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

Stop relying on AI. Go back to the old ways. Grow your own food. From the farmer to the customer. Let people be. Encourage self sufficiency and keep industries, refineries in NZ. Relying on global industries is economical suicide.

Future Development Plan 2023 #7319

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Your feedback

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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?

Disagree

Tell us why

Most of auckland is fairly condensed now

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?

Other

Tell us why

Essential shops only as long as they do not encroach upon existing homes in undesirable way.

Cars are essential for many people for a variety of reasons, especially for those with mobility health or mental health issues.
Do not make it difficult or costly to travell from a-b

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?

Disagree

Tell us why

The 'Climate' is not in Crisis.

HAARP IS! STOP HAARP!
Address areas if something happens, strengthen areas that may potentially be at obvious risk

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

Nature areas addressing water catchment, erosion etc are good.
HAARP AFFECTING WEATHER IS NOT!

Other feedback

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

Future Development Plan 2023 #7320

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Your feedback

Focusing growth

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

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

Disagree

Tell us why
No 15 minute city.

Accessible local centres

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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?

Disagree

Tell us why
No 15 minute city.

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?

Disagree

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?

Other

Tell us why

Other feedback

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

Listen to the majority voice...

Future Development Plan 2023 #7360

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Your feedback

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

Disagree

Tell us why

Accessible local centres

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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?

Disagree

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.

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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?

Disagree

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?

Disagree

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 Plan 2023 #7402

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Your feedback

Focusing growth

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

Agree

Tell us why

Compact growth is a better vision for Auckland and makes sharing the cost of services cheaper such as transport, so is also more financially sustainable for the Council, Government and citizens. Even the statement "what greenfield growth there is will be phased over 30 years and longer" further encourages the wrong type of growth. This needs to be coupled with more enabled growth in the existing urban areas and avoid spurious politically driven controls to give proper effect to the NPS-UD and such as blanket "heritage", view shafts, and enable mixed use zoning to encourage access to local amenities.

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

Basically, make my life easier by bringing things closer to me. Amenities do not necessarily need to be in local centres per se, but spread throughout the urban area such as the example of mixed-use in East Asia (e.g. Japan, South Korea) and Europe. The key access limitation in much of Auckland is supermarkets and walking with groceries can only be feasible for a few hundred metres for normal people.

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.

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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

A risk-based approach is needed, if this can be quantified given uncertainties.

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?

Disagree

Tell us why

No evidence is provided to support the assertion to prioritise investment in the stated way. Nature-based infrastructure and decentralized infrastructure is not necessarily the best approach for all situations and purposes. For example a centralised approach to wastewater treatment and water supply could entail economies of scale, cheaper prices and greater resilience (water

pumped from the Waikato River to North Auckland). A tailored approach is needed balancing effectiveness, feasibility and cost effectiveness across the city. Engineered nature-based approaches should complement standard approaches, and planning and perhaps many locations are too built up already to actually implement nature-based infrastructure.

Other feedback

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

The document is somewhat confusing with nodes and metro centres etc. not overlaid on one map. It is unclear what the metro centres mean relative to the nodes. Some of the nodes in the multi-nodal approach shouldn't be progressed further such as Pukekohe or Warkworth. Focus on enhancing existing assets rather than new ones such as New Lynn (recall millions of sunk investment already).

Please stop the balderdash "Since the late 1990's Tāmaki Makaurau has promoted a quality compact approach to growth." - and yet Auckland has sprawled in all directions since the 90s to places on the periphery like Millwater, Flatbush etc. Reality doesn't match the words.

Future Development Plan 2023 #7411

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Your feedback

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

Disagree

Tell us why

Accessible local centres

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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?

Disagree

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.

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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?

Disagree

Tell us why

Resilient infrastructure

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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?

Disagree

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 Plan 2023 #7433

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Your feedback

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Disagree

Tell us why

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

Disagree

Tell us why

Following NWO agenda?

Avoiding hazards

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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?

Disagree

Tell us why

Climate change is nothing more than naturally occurring phenomenon. Stop speculating on humans screwing up with the planet. Put on real science hat. Ignorance is a bliss.

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

Disagree

Tell us why

What climate change? You must be very delusional.

Other feedback

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

Just do your job and jump off the bandwagon of "climate" change and generally WEF directives.

Future Development Plan 2023 #7448

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Your feedback

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

Disagree

Tell us why

Accessible local centres

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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?

Disagree

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.

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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?

Disagree

Tell us why

Resilient infrastructure

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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?

Disagree

Tell us why

Other feedback

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

Stop building so many, so called houses on a one house property. Too many people living on top of each other.

Future Development Plan 2023 #7468

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Your feedback

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

Agree

Tell us why

Accessible local centres

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

Disagree

Tell us why

Avoiding hazards

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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?

Disagree

Tell us why

Resilient infrastructure

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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?

Disagree

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 Plan 2023 #7486

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

Disagree

Tell us why

Because we've Buslanes cycle tracks , & hardly any places for parking for tenants and visitors, this method will ruin our living standards.

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?

Disagree

Tell us why

Don't wreck our farm and production land, but also don't fence us in

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.

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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?

Disagree

Tell us why

Bill Gates etc don't worry about tsunamis etc with their mansions on the beach. Why should we. At the same time, let's be practical.

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

Disagree

Tell us why

Rain gardens? How about cleaning & widening our waterways, bigger & more waterways etc. Your enormous waste of money on safety trucks, signs, cones etc is criminal. Be simple. Be safe, but be cost effective.

Other feedback

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

Future Development Plan 2023 #7499

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Your feedback

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

Agree

Tell us why

Accessible local centres

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

Agree

Tell us why

Avoiding hazards

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Agree

Tell us why

Resilient infrastructure

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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?

Agree

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 Plan 2023 #7533

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Your feedback

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

Disagree

Tell us why

Accessible local centres

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

Disagree

Tell us why

Avoiding hazards

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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?

I don't know

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

Disagree

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 Plan 2023 #7535

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Your feedback

Focusing growth

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

Disagree

Tell us why

Accessible local centres

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

Disagree

Tell us why

Avoiding hazards

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Disagree

Tell us why

Resilient infrastructure

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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?

Disagree

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 Plan 2023 #7554

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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?

Disagree

Tell us why
Killing the character of Kiwi way of living

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?

Disagree

Tell us why
Many reasons

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?

Disagree

Tell us why
I don't think that make sense

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
Connect with nature

Other feedback

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

Auckland needs to spread and everyone has to have their vegetables and fruits

Future Development Plan 2023 #7569

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Your feedback

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

Disagree

Tell us why

The lack of council infrastructure and maintenance will lead to ghettos

Accessible local centres

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

Disagree

Tell us why

It's been proven our public transport is not reliable. Just fix that first

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?

Disagree

Tell us why

Our climate has always changed and documentation from from qualified scientists around the world support the fact that co2 emissions are required for a healthy planet. Plants need CO2 to grow! Plants expel oxygen which people need. year 9 science. There is no climate emergency. Sea levels have been the same for the last decade. Coastal erosion is natural and will always occur. Most people are aware that cloud seeding is real and possibly has something to do with the odd weather patterns we are experiencing.

Resilient infrastructure

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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?

Disagree

Tell us why

No I think you should focus on existing storm water, sewer , water supply, power supply , reliable internet and roads. When these are reliable and working you will have a good case to start ideological plans.

Other feedback

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

Yeah, focus on your core business that will actually help the people thrive.

Future Development Plan 2023 #7582

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Your feedback

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

Disagree

Tell us why

Need reality and keep prices reasonable

Accessible local centres

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

Disagree

Tell us why

Nit practical in reality

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.

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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?

Other

Tell us why

Within reason.
Not by some clerk in an office.

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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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
Need commonsense balance.

Other feedback

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

Future Development Plan 2023 #7601

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Your feedback

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

Disagree

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?

Disagree

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?

Disagree

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?

Disagree

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 Plan 2023 #7611

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Your feedback

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

Disagree

Tell us why

Accessible local centres

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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?

Disagree

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.

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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?

Disagree

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?

Disagree

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 Plan 2023 #7618

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Your feedback

Focusing growth

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

I don't know

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?

Agree

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?

Agree

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?

Disagree

Tell us why

Other feedback

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

Upgrade the maternity unit in West Auckland we are the fastest growing area and we no longer have safe services as constantly over capacity

Future Development Plan 2023 #7625

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Your feedback

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

Disagree

Tell us why

Roads and infrastructure already well past capabilities. This will only make it worse.

Accessible local centres

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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?

Disagree

Tell us why

Create new mini city's where people can shop, work and build their
own community rather than add more pressure onto an already stressed communities.

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?

Disagree

Tell us why

You are waiting for an area to become a known hazard risk.
Adding more infill housing will not fix this problem, fix a broken city first before growing it.

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?

Other

Tell us why

Fix broken roads first. Potholes are EVERYWHERE, our streets are a safety hazard. Once roads are repaired, culvits and drains are cleared, streams are maintained THEN look at beautification and nature.

Other feedback

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

If our city is going to grow by the numbers you are predicting, I assume this is from immigration. Immigration is good for our country to grow, but add an immigration tax, entry fee levy to live in Auckland city, by way of a large one off payment ie $50 k per head. This goes directly to infrastructure. If they move to NZ and can’t afford the levy they will have to live outside of Auckland which will grow smaller cities and spread the pressure. There would have to be some form of ensuring, if they relocate to Auckland within an excluded time period that this is somehow monitored.

Future Development Plan 2023 #7635

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Your feedback

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

Agree

Tell us why

Sprawling cities destroy green and arable land, and make it harder for people to get around easily, puts pressure on services.

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

Avoiding hazards

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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
It's common sense!

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?

Agree

Tell us why
Communities and iwi need to be involved throughput in solutions.

Other feedback

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

More investment in public transport, open a lane of the harbour bridge to bikes and pedestrians.

Future Development Plan 2023 #7641

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Your feedback

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

Disagree

Tell us why

Current areas of development in urban areas shows there is a lack of infrastructure being provided , ie wider roads for on street parkin , park areas for kids to play , There is still significant infrastructure upgrades required for "Brownfield "development
Drury Growth area - the Industrial development of Stevensons Ltd is providing a large opportunity for work in the area. Following Councils vision of living close to where you work (fully endorsed by my wife and I) it makes sense to develop residential close to the Industrial area to limit the need to travel far to work.

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?

Disagree

Tell us why

Not all business is focused on local centers . eg Stevenson development in Drury, best to have workers live close to the industrial area to minimize road congestion.

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

Current Engineering solutions have been demonstrated to work as seen in the latest cyclone Gabriel , new areas did not suffer.
Care is required in excluding areas from development purely based on some perceived or actual risk as this may be able to be adequately mitigated.

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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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

Agree .

But strongly resent reference to appeasing Maori beliefs.

All systems should be "best practice ", practical and affordable all giving the appropriate level of improved stormwater treatment.

Other feedback

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

Please see attached a typed submission.

DODD CIVIL
CONSULTANTS
Down To Earth
Personal Service

#7641
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P.O. Box 72-543 Papakura 2244
Auckland, New Zealand
Tel: 64 9 296 5543
Email: admin@doddcivil.co.nz
www.doddcivil.co.nz

Our Ref: 189/01

10 July 2023

Auckland City Council

Dear Sir/Madam

Re: F.D.S Submission

Removal of Drury and other areas from the "Future Urban Zone".

This submission is given on behalf of:

[redacted]

That is, that this submission is to be counted twice.

This submission has also been sent to Councillor Daniel Newman and Councillor Angela Dalton.

Comments on the proposed changes:

1. Undermines confidence in Council. The clear "public expectation" with a "Future Urban Zone" is that the development will follow at some time in the future. The expectation is that due consideration of all factors and constraints have been considered in reaching the setting of the "Future Urban Zone" clarification. If this change is made developers will have less confidence in developing in Auckland and may choose to go elsewhere where their already high risks will be less than in Auckland.

2. The removal of the "Future Urban Zone" clearly shows a waste of money either earlier when setting the future urban zones or now. There have been no fundamental physical changes between these two points in time.

3. There has been no formal notification of those who would be adversely affected by this change. While acknowledging your extension to the submission period there has still been no formal notification directly received. I would expect there should be direct notification as property owners, many who recently bought properties with a clear expectation of developing in the future, will suffer significant financial loss.

4. If the areas are removed from the "Future Urban Zone" there should be a refund of rates paid on the "inflated property values" since the "Future Urban Zone" classification.

5. If the "Future Urban Zones" are removed – what will this land be used for?

   Note: These comments relate specifically to the Drury area:
   - Regional Park (Council to purchase flood prone areas for park).
   - Lifestyle Blocks (self-sufficient) 1 or 2 Ha Blocks
   - Remove Rural (requires no further extension of the current approved residential zones).

Note: our property is currently only 1 paddock away from the Oyster Group development which has high density 3 level residential on their boundary closest to our property.

Note: Current properties adjoining currently Urban zoned land will have their privacy and personal enjoyment of their property, severely impacted.

Suggested outcome – allow development of further "Lifestyle Blocks", most of the area is already "Lifestyle". This would be a compromise and allow some further development with "self-sufficient" properties and only a small increase to traffic in the area. This also assists Council in appeasing financially distraught property owners.

6. Current processes adequately manage flood risk which can have well "Engineered Solutions". This is evidenced by the recent Cyclone Gabriel which had little affect on newly developed areas across Auckland City.

7. Drury Growth area – the Industrial development of Stevensons Ltd is providing a large opportunity for work in the area. Following Councils vision of living close to where you work (fully endorsed by my wife and I) it makes sense to develop residential close to the Industrial area to limit the need to travel far to work.

   Note: Not all work is in the CBD areas.

Yours faithfully
Dodd Civil Consultants Ltd

[redacted]

[redacted]
MANAGING DIRECTOR

PD:TB

Future Development Plan 2023 #7654

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Your feedback

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

Agree

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?

Agree

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?

Agree

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?

Agree

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 Plan 2023 #7673

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Your feedback

Focusing growth

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

Disagree

Tell us why

Accessible local centres

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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?

Disagree

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.

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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?

Disagree

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?

Disagree

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 Plan 2023 #7677

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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?

Disagree

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?

Disagree

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?

Disagree

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?

Disagree

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 Plan 2023 #7679

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Your feedback

Focusing growth

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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

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

If the natural hazard risk could be managed within the subject developed site not causing the downstream catchment, surround environment or joining neighboring sites, Council should enable the development of the site.

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

Other feedback

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

Yelash Road Massey joins beside the single house zone. No covenant of trees and owners have converted land to grass paddock. Council should consider housing density transition, from single zone to countryside living.

These properties also satisfy FDS criteria, including good accessible to Centre, resilient infrastructure (town water supply, natural swales, detention basins, Council Road) to attenuate 1%AEP flood event and on-site mitigation of hazards. Wastewater can be resolved by pressure main system.

Future Development Plan 2023 #7697

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Your feedback

Focusing growth

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

Disagree

Tell us why

Council needs to improve the roads and homelessness in AK then focusing on urban areas

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?

Disagree

Tell us why

It will feel like an in closure, I love travelling to visit faraway places in AK

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
Make sense

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?

Disagree

Tell us why
Your pushing me to choose your option of sustainable living

Other feedback

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

As mentioned in the first question, improvements are needed elsewhere

Future Development Plan 2023 #7705

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Your feedback

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

Disagree

Tell us why

Accessible local centres

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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?

Disagree

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.

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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?

Disagree

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?

Disagree

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 Plan 2023 #7775

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Your feedback

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

Other

Tell us why

Extend Auckland to allow for less dense "cookie cutter" cheap builds. Let's build conscious communities with huge gardena, encourage growing food and raising animals.

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

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?

Disagree

Tell us why

Climate is change. And is unpredictable. It takes five minutes to find out that we have had hotter, colder and more severe storms in the last hundred years. No more fear mongering and certainly no 15 min cities. Investigate weather modification technology (USA patents register contains many pages) and make using this technology a crime.

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?

Other

Tell us why

Nature is climate, think of how much carbon is emitted from one volcanic eruption!? Mother nature is a force more powerful than arrogant humans would believe, if she wanted us gone, we would disappear overnight.

In saying that, we should of course stop pollution, clear our precious waterways and live in harmony with nature and natural cycles.
Incorporate nature into all design. "Spare" park land should also become food forests using peramaculture methods.

Other feedback

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

Scrap any ideas of controlled 15 min cities

Future Development Plan 2023 #7795

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Your feedback

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

I don't know

Tell us why

Supportive of intensification to a point. Too much infill and density can result in poor quality housing for residents with poor access to open space

Accessible local centres

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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

Aucklands public transport is very unreliable! Also don't take away all
Of the existing areas of car parking as locals still need to drive to their local centres

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.

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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?

Agree

Tell us why

You need accurate, comprehensive and historic weather modelling . Don’t over exaggerate the risks

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?

Disagree

Tell us why

These solutions are costly and not always effective . If you are building nature based solutions make sure they are properly managed and maintained

Other feedback

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

Focus need to take economics into consideration

Future Development Plan 2023 #7802

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Your feedback

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

Other

Tell us why

Why must Auckland grow? Can we not stem this growth?

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

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.

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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?

Agree

Tell us why

Resilient infrastructure

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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?

Agree

Tell us why

Other feedback

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

These questions are very biased towards growth. I propose that Auckland also looks at options for less/no growth, and improving existing infrastructure and housing.

Future Development Plan 2023 #7816

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Your feedback

Focusing growth

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

Disagree

Tell us why

Accessible local centres

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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?

Disagree

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?

Disagree

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?

Disagree

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 Plan 2023 #7845

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Your feedback

Focusing growth

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

Agree

Tell us why

Intensify existing urban areas preserve elite productive rural land

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

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.

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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?

Agree

Tell us why

Resilient infrastructure

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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?

Agree

Tell us why

Other feedback

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

Retain rural Karaka -do not rezone as future urban

Future Development Plan 2023 #7855

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Your feedback

Focusing growth

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

Disagree

Tell us why

Accessible local centres

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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?

Disagree

Tell us why

Avoiding hazards

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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?

Disagree

Tell us why

Resilient infrastructure

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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?

Disagree

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 Plan 2023 #7878

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Your feedback

Focusing growth

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

Disagree

Tell us why

Intense house put pressure on infrastructure that is already struggling

Accessible local centres

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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?

Disagree

Tell us why

Allows for areas of interest that will increase crime

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.

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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?

Agree

Tell us why

Resilient infrastructure

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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?

Disagree

Tell us why

Cultivation of home grown food is more important

Other feedback

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

Future Development Plan 2023 #7893

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Your feedback

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

Disagree

Tell us why

greater fire risk for firefighters, not great for social development, not green

Accessible local centres

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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

Avoiding hazards

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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?

Agree

Tell us why

Resilient infrastructure

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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?

Agree

Tell us why

Other feedback

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

should develop ex urban lots of areas like Karaka could easily be subdivided without the need for infrastructure as they use their own water tanks and septic systems

Future Development Plan 2023 #7902

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?

Disagree

Tell us why

Who wants to live in a tiny flat with no room or privacy for children to play, narrow streets with little parking, can't have visitors come over and park. Talk about going backwards. Turning into Coronation Street.

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?

Disagree

Tell us why

Public transport is limited and a big let down. Someone I know had to use 4 busses to get to the city for an all day course during the holidays and the trains weren't going that morning. If you had it up to scratch with regular busses and trains and a far reaching and interconnecting train

network it would be more doable. Who wants to carry bigger amounts of shopping on public transport? What a nightmare. I've used solely public transport in Australia and that worked well. It doesn't in NZ.

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?

Disagree

Tell us why

I think we should stop allowing the sudden severe weather that is plaguing us to be allowed to be created in the first place. It's being done to force people from rural areas to small controlled communities where we can all be monitored and corralled. 15 minute cities and less.

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

I don't see a problem as long as it isn't taking away from areas that are used by the public or current housing etc. I don't agree with putting concrete planter boxes in road lanes to stop traffic and sectioning off roads at all.

Other feedback

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

It's great for cyclists to have more space and safety etc but not at the expense of vehicles. We don't want big road bumps everywhere and 30km zones and tiny homes with no parking yet nowhere near decent transport. The prices of transport are ridiculous. People's lives are being narrowed down intentionally.

Future Development Plan 2023 #7903

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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

Avoiding development in greenfield areas has numerous benefits. It prevents urban sprawl which can lead to both natural environmental loss, degradation and ecological disconnection.

Focusing on brownfield development also allows a more concentrated transport network, meaning active and public transport can become further relied upon by commuters. When used, car kilometers will also be reduced. The effects of urban growth, in existing urban areas therefor allows a lower carbon transport network, in turn, lowering the emissions profile of Auckland.

One notable downside of brownfield development is often used excuse of 'lack of space' that prevents the implementation of high standard water sensitive design/nature-based solutions. The implementation of such in the urban environment must be enabled in this strategy.
Ecological connectivity should also be enabled by this strategy. Such as the revitalisation and promotion of the North-West Wildlink.

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
If done well, this should allow for a lowered dependence on private vehicle use and overall travel distance and therefor lower emissions for Auckland.

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
Forest & Bird has strongly advocated for the implementation of nature-based solutions, managed retreat and appropriate use of land. The areas avoided due to hazard risk should be used for ecological areas and nature-based solutions.

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

Forest & Bird has strongly advocated for the use of nature-based solutions due to the numerous ecological, societal and climate benefits.

Other feedback

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

This strategy should explicitly protect SNA's from future infrastructure development. This will enable the protection of SNA's from infrastructure defined under the NPS-IB. In doing so, the development strategy will align to Auckland's Indigenous Biodiversity Strategy, Urban Ngahere Strategy and Auckland Plan 2050.

Forest & Bird would appreciate further engagement on the implementation of this and other strategies, plans and policy development.

Room for rivers source: https://www.forestandbird.org.nz/campaigns/room-rivers#:~:text=Making%20room%20for%20rivers%20allows,birds%2C%20and%20more%20recreation%20opportunities

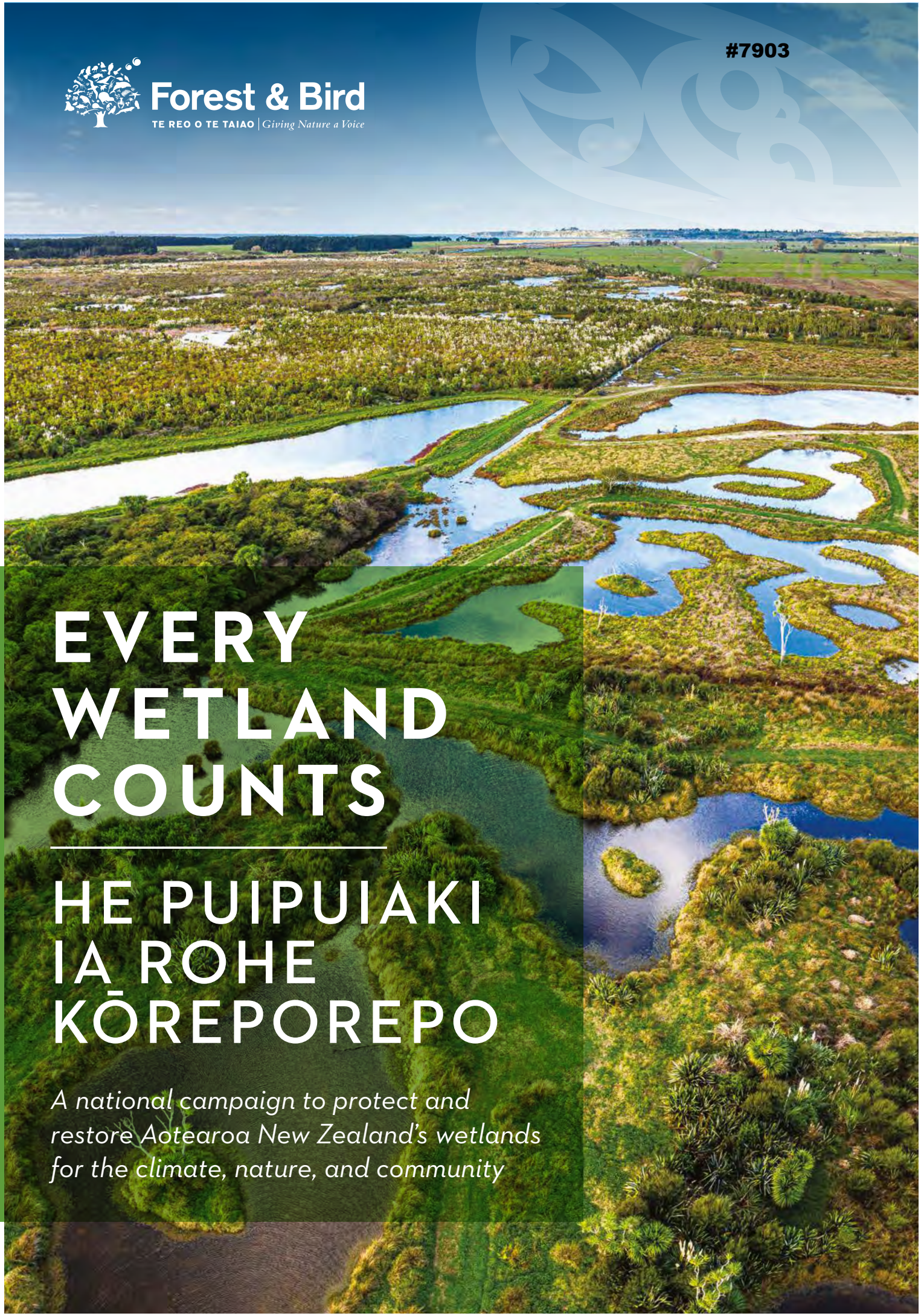
#7903

Forest & Bird
TE REO O TE TAIAO | *Giving Nature a Voice*

EVERY WETLAND COUNTS

HE PUIPUIAKI IA ROHE KŌREPOREPO

A national campaign to protect and restore Aotearoa New Zealand's wetlands for the climate, nature, and community



Kaituna wetland habitat restoration, Bay of Plenty. © Rob Suisted


Wetland drainage canals, Te Puke. © Rob Suisted


Matuku-hūrepo bittern. © Neil Robert Hutton

#7903


Salt marsh, Marlborough. © Rob Suisted

WHAT'S HAPPENING TO OUR WETLANDS?

We have lost 90% of our wetlands over the last century. They have been drained, degraded, and destroyed to make way for farming, housing, mining, quarrying, and landfills. This is still happening today, much of it done illegally and with impunity.[1]

Every drained wetland has negative effects on our climate. Their loss also reduces the natural diversity of our special wetland birds, fish, insects, and plants.

But we can do something about it. Drained wetlands can be rewetted and restored, and when they are it's a WIN-WIN-WIN for the climate, nature, and communities.

HEALTHY WETLANDS HEALTHY NATURE

The survival of threatened wetland birds such as matuku-hūrepo Australasian bittern, pāteke brown teal, mātātā fernbird, and kōtuku white heron relies on remnant wetlands.

Native fish like īnanga, tuna longfin eel, and waikaka mudfish are vulnerable to the effects of climate change.[5] In New Zealand, wetlands support the greatest concentration of wildlife species than any other native habitat.[6]

Special plants need wetlands too, like the critically endangered swamp helmet orchid which is only found in Whangamarino Wetland.[7] And the plant Māori musk, found in salt marshes, will continue to be vulnerable if coastal wetlands are not mapped and restored.

HEALTHY WETLANDS HEALTHY CLIMATE

Wetlands store large amounts of carbon, helping mitigate the impacts of climate change. Peatlands are significant long-term carbon sinks and hold carbon in compact spaces over thousands of years.

Globally, peatlands store twice as much carbon as all the world's forests combined.[8]

Coastal wetlands such as mangroves, salt marshes, and sea grass beds are vital for the sequestration of blue carbon. Coastal wetlands store carbon quickly in their fast-growing plants and accumulated soil.

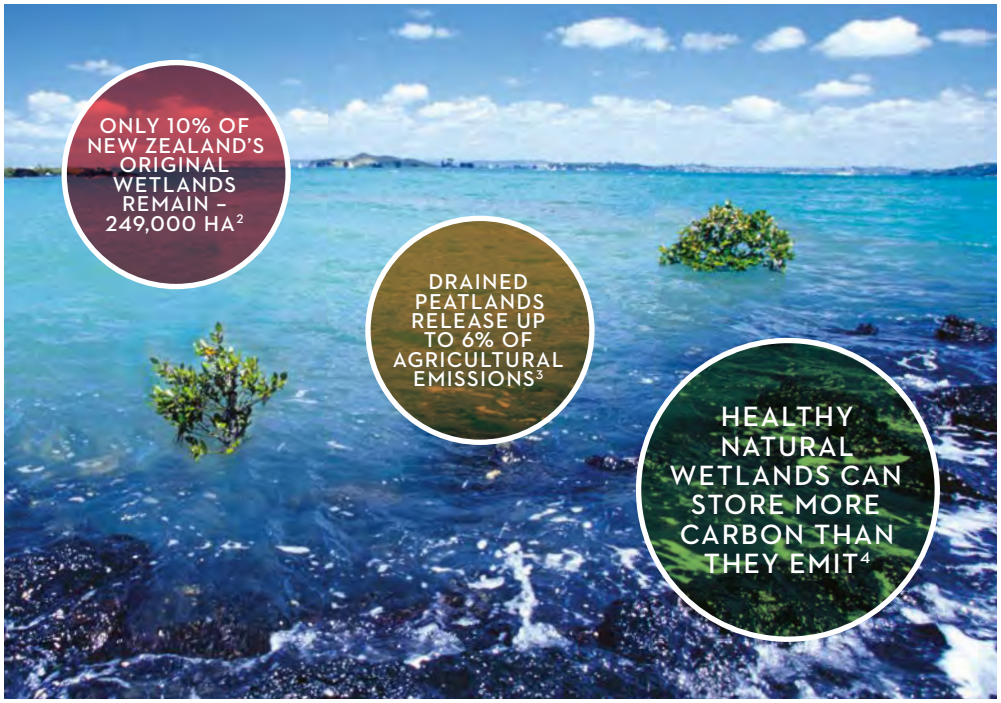
Coastal wetlands sequester carbon up to 57 times faster than a tropical forest.[9]

Restoring wetlands increases climate resilience by buffering communities from coastal storm surges, wave damage, and floods. They help stabilise shorelines, waterways, water supplies, and local microclimates.

Wetlands offer nature-based solutions to help us adapt to climate change and reduce disaster risk.[10]

Wetlands maintain local climate and reduce temperature extremes. By storing rainwater and slowly releasing it to the surrounding environment, they can recharge water to the ground, rivers, lakes, and streams.

The water released from wetland vegetation has a local cooling effect and reduces fire risk.[11]



Mangroves, Hauraki Gulf. © Rob Suisted



Kahikatea swamp, Lake Brunner. © Steve Reekie

HEALTHY WETLANDS HEALTHY COMMUNITY

Wetlands are taonga for tangata whenua with cultural, economic, historical, and spiritual significance. They are sources of many things including mātauranga knowledge, oranga wellbeing, mahinga kai food gathering, and rongoā medicines. Healthy wetlands protect the mauri of freshwater and the wellbeing of the wider environment and community.[12]

Protecting and restoring wetlands delivers many co-benefits for people. Wetlands can clean pollution from water and provide a place for leisure, recreation, and cultural practices. Identifying, valuing, and restoring wetlands as a climate action will also support community health and wellbeing.[13]

Rewetting drained peatlands can provide a pathway for the primary sector to transition toward more sustainable land uses. Paludiculture is the productive use of formerly drained peat wetlands. Landowners can restore wetlands to reduce emissions, provide valuable habitat, and still generate income.[14]



Īnanga. © Rod Morris

SAVE OUR **WETLANDS**

#7903

Forest & Bird and 10 leading climate, environment, health, and recreation organisations are calling on the Government to draw up a national wetland protection and restoration plan. As part of the country's climate response, we want to see the Prime Minister and her ministers:

1. **Double the extent of natural wetlands by 2050** with interim goals.
2. Establish and implement an **Aotearoa Wetland Protection and Restoration Plan** for carbon sequestration and the mitigation of climate change effects with ambitious, measurable, and enforceable regional targets.
3. **Provide $100 million of additional government funding** in the next four years to establish seed funding for new wetland restoration and paludiculture trials.
4. **Map** current and historical mangrove, salt marsh, and sea grass extent by 2030.
5. Require land managers to **account for drained wetlands in the Emissions Trading Scheme**, and protect and restore wetlands as emission reduction mechanisms in Farm Environment Plans.
6. Stop the current destruction of wetlands by agriculture, urban development, mining, quarrying, and landfills by ensuring **existing regulations are not watered down – and are properly enforced.**

Taken together, these six actions will significantly boost the ability of New Zealand's wetlands to help mitigate climate change impacts for the benefit of people, nature, and the planet.



Forest & Bird wetland planting project, Wainuiomata.

#7903

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15. Department of Conservation. (2022) "Awarua Waituna Wetlands." https://www.doc.govt.nz/.

"The Awarua-Waituna wetlands is one of the largest remaining wetland complexes in New Zealand and is important for its biological diversity and cultural values." [15]



Forest & Bird
TE REO O TE TAIAO | *Giving Nature a Voice*

Every Wetland Counts © Published by Forest & Bird

For more information, email freshwater@forestandbird.org.nz
or go to www.forestandbird.org.nz

Waituna Lagoon, Southland. © Shellie Evans

The following organisations endorse Every Wetland Counts He Puipuiaki Ia Rohe Kōreporepo.

CHOOSE CLEAN WATER

Fish & Game NEW ZEALAND

NEW ZEALAND GAME BIRD HABITAT TRUST

Generation Zero

GREENPEACE

WETLAND TRUST

OraTaiao NZ Climate & Health Council

Public Health Association of New Zealand Kāhui Hauora Tūmatanui

Whitewater NZ

WWF

Future Development Plan 2023 #7913

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Your feedback

Focusing growth

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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?

Please find attached a submission to the draft Future Development Strategy related to land at Golding Road, Pukekohe.

#7913

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27 July 2023

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Boffa Miskell

SUBMISSION ON THE AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023 – 2053

This submission provides feedback on Auckland Council's Auckland Future Development Strategy ("**FDS**") 2023 –2053 with a focus on the proposed timing on the release of future urban areas for development based on identified infrastructure triggers. This submission is lodged on behalf of the owners of the land located at 47 Golding Road, Pukekohe.

47 Golding Road, Pukekohe and surrounding environment

The property at [redacted] Pukekohe (the "**subject site**") is located on the eastern side of Golding Road, approximately 350m from the intersection with Pukekohe East Road as indicated in **Figure 1**. The subject site is zoned Future Urban Zone ("**FUZ**"), as is the surrounding environment to the south along Golding Road, to the east along Pukekohe East Road and to the south-west on the other side of Golding Road. The land immediately opposite the subject site, approximately 30ha in area, has recently been rezoned from FUZ to Residential – Mixed Housing Urban ("**MHU**") zone.

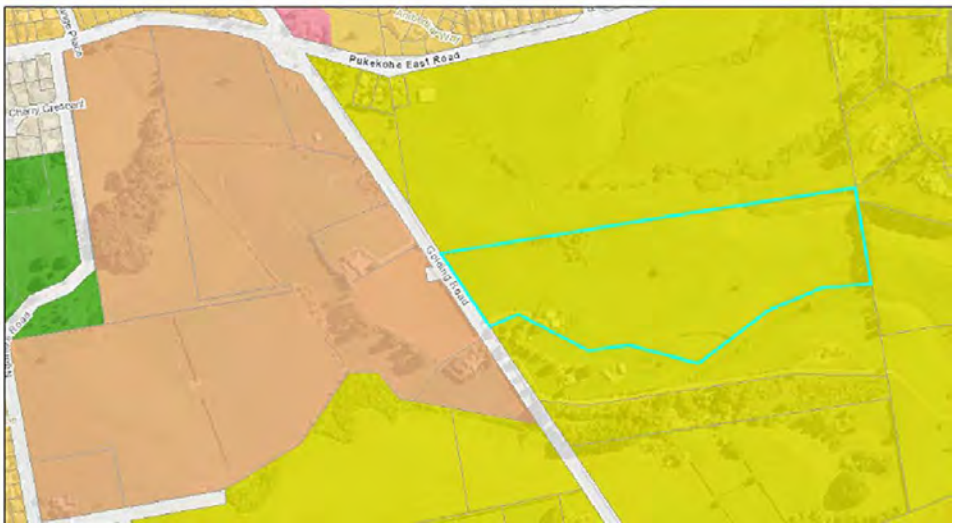


***Figure 1:** The subject site is identified by the blue outline (Auckland Council GeoMaps)*

A further Private Plan Change request has been lodged with the Council to rezone the subject site and adjacent properties from FUZ to MHU. We are advised that the Council is currently in the process of preparing the Clause 25 report which is likely to be considered by the Planning Committee in September.

Pukekohe-East Central Precinct

As part of Plan Change 76 (Private): Kohe ("**PC76**"), the land directly opposite the subject site (see **Figure 1** above) was rezoned from FUZ to MHU. PC76 was made fully operative on 20 July 2023.

A number of infrastructure upgrades are required to accommodate development anticipated as a result of rezoning the land under PC76 for residential use. These include upgrades to wastewater provision, water supply, roading / transport, stormwater infrastructure and power / telecommunications. It is noted in the background documentation for PC76 (refer to Attachment J – Infrastructure P5 Response) that many of these infrastructure upgrades either have existing funding prioritised or are anticipated to be funded by the PC76 applicant Aedifice Development No.1 Limited ("**ADNL**"). The anticipated timeline for these infrastructure upgrades is as follows:

- *Wastewater provision* – A wastewater line is proposed to be constructed by Watercare as part of their Long-Term servicing strategy for the area and is anticipated to be completed late 2025. If funding is obtained by ADNL, the works are anticipated to be completed by August 2023. A wastewater pump station is also proposed to be funded and completed by ADNL by September 2023.
- *Stormwater provision* – All required stormwater and flood management infrastructure is proposed to be funded by ADNL where the timeline for completion of the works has not yet been confirmed. A Stormwater Management Plan ("**SMP**") has been developed for the land subject to PC76 which provides the stormwater management approach for the Pukekohe-East Central Precinct.
- *Water supply* – A watermain and associated water supply infrastructure is proposed to be funded by ADNL and anticipated to be completed by June 2023.
- *Power / Telecommunications* – Underground cables are proposed to connect future dwellings to existing overhead powerlines within the Pukekohe-East Central Precinct. These upgrades are proposed to be funded by ADNL and are anticipated to be completed by June 2023.
- *Roading / Transport* – The section of Golding Road which provides access to the subject site is proposed to be widened and funded by ADNL. It is noted that Auckland Transport are currently in the process of finalising further research but it is anticipated that funding will be secured and a Notice of Requirement ("**NoR**") notified by 2026. This matter is further discussed below.

The operative I453.9. Pukekohe-East Central Precinct Plan also includes infrastructure provisions relating to roading and stormwater requirements which impact the section of Golding Road used to access the subject site. These requirements are triggered at the time of development and subdivision within the Pukekohe-East Central Precinct:

- Rule I453.6.4.3 Stormwater – requires development and subdivision to manage stormwater byway of communal stormwater devices. The assessment criterion related to this standard requires these stormwater devices to be designed in accordance with the Pukekohe-East Central Precinct SMP, this has already been prepared by ADNL.
- Rule I453.6.4.2 Transport – requires a number of existing rural roads within and surrounding the Pukekohe-East Central Precinct to be upgraded to local and collector roads.

As mentioned above, the I453.9. Pukekohe-East Central Precinct Plan provisions provide Auckland Transport with the ability to upgrade Golding Road to an arterial road:

- Rule I453.6.4.7 Road Widening Setback along Golding Road – provides for the potential future widening of Golding Road as an arterial road if Auckland Transport issue a NoR by January 2026. Until this date, a 2m-wide road widening setback must be provided along the part of the frontage adjoining the western side of Golding Road.

Future Development Strategy

The draft FDS proposes to amend the sequencing and timing of many FUZ areas in Auckland, including the FUZ associated with the subject site identified as Pukekohe East. The proposed new timing for the release of the Pukekohe East FUZ is shown as 2035+ (refer to Figure 13, page 41 of the FDS). Under the current Future Urban Land Supply Strategy 2017, the subject site FUZ is identified to be development ready between 2023 – 2027.

The primary rationale provided in the draft FDS for the change in timing is to account for updated infrastructure triggers. The draft FDS identifies that those locations where infrastructure projects are anticipated to be committed and funded, or complete, within Decade One (being 2023 – 2033) and are considered to be development ready.

The submitter opposes the delayed timing for release of the subject FUZ at the subject site. The submitter considers that there is sufficient certainty of adequate infrastructure provision to ensure the land would be development ready within Decade One.

Appendix 6 of the FDS identifies the infrastructure triggers associated with the Pukekohe East FUZ to include the:

- upgrading of Pukekohe Arterials;
- Mill Road upgrade (Bombay Interchange and Harrisville Road); and
- electrification of the Papakura to Pukekohe rail line.

However, Appendix 3: Infrastructure to support development capacity of the FDS, identifies that the Papakura to Pukekohe rail electrification is a project which is due to be complete before 2033. Moreover, it is understood that the electrification is anticipated to be completed by 2024.[1]

Furthermore, and as set out above, it is anticipated that funding will be secured and a NoR will be notified by 30 January 2026 for the upgrade of Golding Road to an arterial road (as reflected in the PC76 decision report and in the wording of provisions in the operative Pukekohe-East Central Precinct). It is also understood that the NoR for the upgrade of the Pukekohe North-East arterial is anticipated to be notified late 2023.[2]

Other key infrastructure projects in the area which are identified in Appendix 3 of the FDS to be committed and funded or complete before 2033 and which will support future development in the Pukekohe East FUZ area include:

- Pukekohe Treatment Plant capacity upgrade;
- Waikato A Water Treatment Plan, Waikato 2 watermain upgrades; and

[1] https://at.govt.nz/projects-roadworks/electric-trains-to-pukekohe/
[2] https://findoutmore-supportinggrowth.nz/pukekohe

- The Papakura ki Pukekura - Papakura to Bombay project (anticipated to be complete by 2027)[3].

In addition, the operative I453.9. Pukekohe-East Central Precinct Plan 1 indicates a collector road through the precinct connecting Birch Road and Golding Road. The intersection with Golding Road is indicated as being in close proximity to the subject site. The indicative collector road would provide direct linkage from the subject site to the Pukekohe Train Station, the upgrade of which is anticipated to be complete by next year.

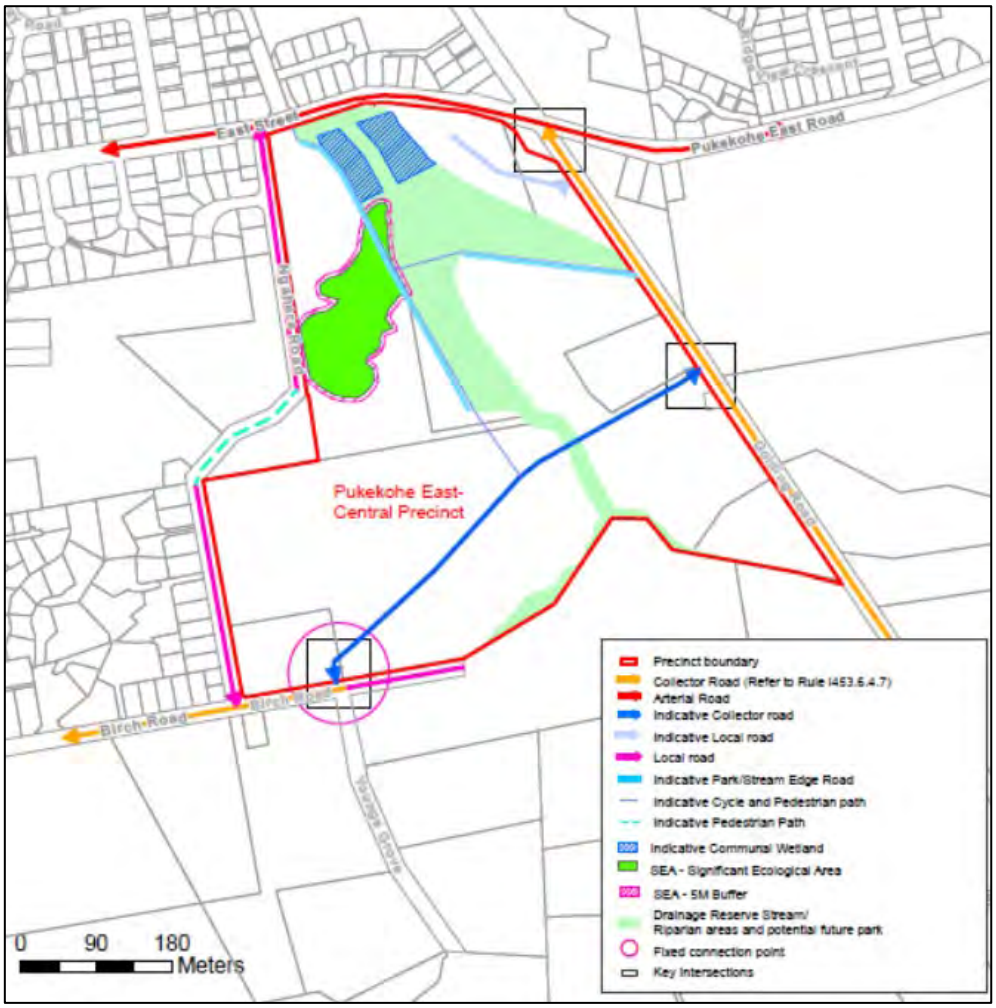


Figure 2: *I453.9. Pukekohe-East Central Precinct Plan 1 (Auckland Unitary Plan (Operative in Part))*

Moreover, and as set out above, upgrades to wastewater provision, water supply, stormwater infrastructure and power / telecommunications at the Pukekohe-East Central Precinct are anticipated to be completed by 2025, with upgrades to roading/transport being triggered through subdivision and development and the notification of a NoR anticipated by 2026.

Overall, the timing of the majority of the critical infrastructure triggers identified in the draft FDS are likely to be committed and funded or complete within Decade One, and before 2030, and the planned and proposed infrastructure upgrades to service the now operative Pukekohe East Central Precinct provide logical connections to the subject site and demonstrate that the subject FUZ area could be development ready between 2026 - 2030.

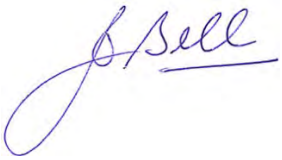
[3] https://www.nzta.govt.nz/projects/sh1-papakura-to-bombay/

Decision sought:

The submitter seeks that the draft FDS be amended to provide a new timing of 2025+ for the Pukekohe East FUZ area.

This recognises that the Pukekohe East Central Precinct is now operative and that a number of infrastructure triggers are anticipated to occur within the next 5 years. As a result, a 2025+ timeframe is considered to align with the draft FDS Principle 5: Enabling sufficient capacity for growth in the right place at the right time. A 2025+ will ensure an integrated and more efficient approach to infrastructure provision and development in the Pukekohe East FUZ area which will overall, improve the ability to achieve good urban design outcomes.

Yours faithfully
BOFFA MISKELL LTD



Janine Bell
Partner / Planner

cc: mark@humanlogix.co.nz

Future Development Plan 2023 #7936

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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?

Disagree

Tell us why
Please refer to submission document.

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?

Other

Tell us why
Please refer to submission document.

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?

Disagree

Tell us why
Please refer to submission document.

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 refer to submission document.

Other feedback

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

Please refer to submission document.

#7936

SUBMISSION ON DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY

TO:	Auckland Council ("**Council**")
SUBMITTER:	Bunnings Limited ("**Bunnings**")
SUBMISSION ON:	Draft Auckland Future Development Strategy ("**Draft FDS**")

Summary

1. Bunnings is one of the leading retailers of home improvement and outdoor living products in Australasia. Employing more than 5,600 New Zealanders, Bunnings operates 41 warehouses and smaller format stores, and 9 trade centres throughout New Zealand, along with a commercial selection centre, a distribution centre and a support office. Due to the scale and spread of our operations, Bunnings is a regular and sophisticated commercial user of the current resource management system. We regularly look to expand our network of sites, and engage with local government bodies to ensure that our sites are carefully designed and planned to a very high standard.

2. Bunnings welcomes the opportunity to submit on the Draft FDS, which proposes changes to Auckland's growth vision over the next 30 years, to and assist with achieving the best outcomes for the region. Bunnings is actively involved in property and land development across Auckland in relation to the expansion of its network of sites.

3. Bunnings has considered the proposals of the Draft FDS, and considers that as it stands, the Draft FDS fails to comply with the requirements of the National Policy Statement on Urban Development 2020 ("**NPS-UD**"). This failure is due to the Draft FDS's reliance on inappropriate assumptions regarding the extent of infill intensification, which Bunnings considers will lead to the provision of insufficient development capacity within the region, which undermines confidence in planning and investment certainty for landowners. The Draft FDS also purports to limit the ability for private plan changes through its implementation. In particular, the Draft FDS:

   (a) does not provide for well-functioning urban environments by inappropriately prioritising investment in existing urban areas;

   (b) applies blunt principles relating to developments in areas subject to natural hazard risk without adequate consideration of other mechanisms and incentives available for ensuring those risks are mitigated;

   (c) does not provide for sufficient development capacity, and inappropriately relies on Plan Change 78 ("**PC78**") to provide for that capacity; and

(d) does not give adequate consideration to the available funding mechanisms for new greenfield development, and creates confusion and uncertainty as it is inconsistent with Auckland's current infrastructure strategy, which anticipates investment in new and expanded infrastructure.

4. Bunnings also has procedural concerns relating to the processes around the development and adoption of the Draft FDS. More work is required to properly consider which areas of Auckland are appropriate for future growth, and the timing of that growth.

5. In light of the above, Bunnings considers that further work is required by the Council to ensure that the Draft FDS fulfils the requirements of the NPS-UD.

6. Bunnings seeks that:

(a) the Draft FDS's consultation period under section 83 of the Local Government Act 2002 be further extended until such a time further work has been undertaken by the Council to identify areas appropriate for intensification – the extension for submission to 31 July 2023 is acknowledged, but is considered insufficient given the scale and scope of work to be undertaken, the significance of the FDS for future RMA processes, and hazard identification processes following Auckland's recent significant weather events; and

(b) the Council delay the adoption the Draft FDS to be in conjunction with the finalising of PC78 and the adoption of the next Long Term Plan.

Key Statutory Requirements

7. The Draft FDS is prepared in accordance with the requirements of the NPS-UD,[1] and is envisioned to promote long-term strategic planning for the region by setting out how the Council intends to achieve well-functioning urban environments in both its existing and future urban areas, as well as provide sufficient development capacity as required by the NPS-UD over the next 30 years. The Draft FDS is also intended to assist the integration of planning decisions under the Resource Management Act 1991 ("**RMA**") with infrastructure planning and funding decisions.[2]

8. The NPS-UD sets out the various sources of information that must be considered in informing the development of the Draft FDS. These sources include:[3]

(a) the most recent applicable Housing and Business Development Capacity Assessment ("**HBA**");

(b) consideration of different spatial scenarios for achieving the purposes of the FDS; relevant long-term plans;

1 NPS-UD, clause 3.12.
2 NPS-UD, clause 3.13(1).
3 NPS-UD, clause 3.14.

(c) infrastructure strategies or any other relevant plan or strategy;

(d) the feedback received from this consultation;

(e) every National Policy Statement; and

(f) any other relevant national policy required or issued under legislation.

9. Once the Draft FDS is adopted, the Council will be required to have regard to it when preparing or changing RMA planning documents.[4] On that basis, the Draft FDS has the potential to significantly influence RMA decision making processes.

10. The NPS-UD's fundamental purpose is to address the issue of insufficiently appropriately zoned land to meet housing and business development demand. To achieve its purpose, the NPS-UD's first and overarching concept is to provide for well-functioning urban environments, which enable a variety of homes that meet communities' needs, as well as enable a variety of sites that are suitable for different business sectors, among other things. Bunnings considers that concept is indicative of the NPS-UD not being intended to be incorporated into plans in a blunt manner, and that, rather, regard must be had to nuances of specific environments.

Well-functioning urban environments

11. As currently proposed, the Draft FDS is at odds with the underpinning objective of the NPS-UD, particularly around enabling well-functioning urban environments. The Draft FDS fails to appropriately consider options and mechanisms that achieve well-functioning urban environments, in terms of providing for a range of developments in both brownfield and greenfield areas. Similarly, the Draft FDS does not ensure that new development is well integrated with infrastructure, community spaces, green open spaces, and transport nodes.

12. Naturally, there is less scope to achieve this through infill development, as those developments will subsequently operate within areas that are prone to constraint, such as existing, poorly planned urban areas. Bunnings acknowledges that a good portion of development capacity is required from infill, but without appropriate checks and balances and planning (which PC78 is yet to demonstrate), intensification which over relies erroneously on infill will not contribute to well-functioning urban environments.

13. The NPS-UD recognises the need for a mix of both greenfield and brownfield development to provide for well-functioning urban environments. In achieving the fundamental purpose of the NPS-UD, the Council must undertake a balanced and considered approach to greenfield development, including the opportunities those developments can provide to achieving well-functioning urban environments, now and in future.

4 NPS-UD, clause 3.17.

Infrastructure funding constraints

14. Under the NPS-UD, development capacity is considered infrastructure ready if:

    (a) in relation to the short term, there is adequate existing development infrastructure to support the development of land;

    (b) in relation to the medium term, there is adequate existing development infrastructure available to support the development of land or funding for that adequate development infrastructure has been identified in the long-term plan;

    (c) in relation to the long term, funding for adequate development infrastructure has been identified in the long-term plan, or the development infrastructure to support the development capacity is identified in the Council's infrastructure strategy.

15. The premise of the Draft FDS is that infill development that utilises existing infrastructure, against the background that the Council has limited financial resources, is cheaper than greenfield development and is preferred in the short, medium and long term. In many cases, brownfield development can be subject to the same (or sometimes greater) infrastructure constraints. A number of Auckland's brownfield areas are already at- or over-capacity, which may impact those areas' feasibility for future infrastructure upgrades (which therefore ties into the development capacity of those areas). While typically new greenfield developments tend to have higher infrastructure costs upfront in the short term (which are then paid for over time through development contributions), these developments can provide more significant benefits and prove more cost effective over the longer term, when comparing brownfield equivalents. Recently, the Council has amended its development contributions policy to provide for a longer-term outlook for funding of infrastructure in high priority areas – demonstrating that the Council has the tools available to provide for this infrastructure in greenfield areas.

16. These factors are critical and must be considered by the Council in making more nuanced decision-making in relation to infrastructure investment.

17. Favouring infill development, as is currently proposed under the Draft FDS, will lead to perverse outcomes from an infrastructure perspective, whereby old assets are attempted to be upgraded to cater to additional capacity, where that infrastructure's age may pose challenges and additional cost for those upgrades. A balanced and nuanced approach better serves well-functioning urban environments that experience growth over the short, medium, and long-term.

18. Aside from cost, the Draft FDS also fails to recognise the other benefits greenfield development capacity can provide, such as:

    (a) provision of a greater variety of housing choices to meet communities' needs;

(b) the needs of industrial and commercial development that are different to other residential land uses, and face greater land supply challenges through infill (which therefore also increases reverse sensitivity effects); and

(c) opportunities for integrated, master-planned developments that better utilise land for open space and community areas, transport nodes and other engineering.

19. While the Draft FDS has a purported outlook over the long-term with regard to its principles around infrastructure funding, Auckland's most recent infrastructure strategy clearly anticipates significant investment in infrastructure is required to meet growing demand. This is a clear signal that long-term development capacity is infrastructure ready, despite the Draft FDS's suggestion otherwise. Given the region's most recent funding decisions have accounted for long-term new infrastructure and its investment, the approach under the Draft FDS is misaligned with the current Long Term Plan, infrastructure strategy, and NPS-UD.

20. Similarly, as it currently stands, with the direction of the Draft FDS removing greenfield areas from development, this will create additional pressure on demand for existing, live zoned land, which will in turn drive up land and properties values, in the midst of a housing and cost-of-living crisis. Without the Draft FDS being able to provide sufficient development capacity to meet the growing demands of the region, this will drive up competition for existing live zoned land , increasing unaffordability and fuelling other socio-economic issues which interrelate with the housing crisis. This will be the unintentional reality, if the Draft FDS (as currently proposed) is adopted.

Providing for sufficient development capacity

21. The Draft FDS is required to set out how the Council intends to provide at least sufficient development capacity (as required under the NPS-UD) over the next 30 years. In order to be considered as *sufficient* development capacity, under the NPS-UD, development capacity must be plan enabled, infrastructure ready, feasible and reasonably expected to be realised (or for business land, suitable to meet the demands of different business sectors), and meet the expected demand plus the appropriate competitiveness margin.[5]

Plan Change 78

22. The Draft FDS estimates that the total plan enabled net housing capacity for Auckland is 2,345,500 (which includes proposed PC78 enabled residential capacity (with all qualifying matters applied)).[6] However, while the Council in the Draft FDS considers that the feasibility of plan enabled development is variable and will change over time, it also considers that the plan enabled capacity currently exceeds existing or planned infrastructure capacity in many locations.

23. Bunnings considers the Council's approach to be inappropriate, particularly as it places significant reliance on PC78 in determining plan enabled development capacity in the region. Bunnings considers that a

5 NPS-UD, clause 3.2(2) and 3.3(2).
6 Draft FDS at page 29 and Appendix 4.

conservative approach should be adopted in terms of the consideration of PC78, both in terms of overall supply and location because:

(a) A range of areas identified for intensification in PC78 are subject to challenge, including to enable a lower level of intensification through qualifying matters.

(b) Residential development capacity enabled by PC78 is not based on developments that are "ready to be built". Many of the dwellings that are forecasted to be enabled by PC78 are not economically viable to development or may not have the supporting infrastructure to enable those developments. Similarly, other factors such as cross-lease, unit, and leasehold titles of many of the properties will also further restrict developers' ability to intensify and meet those projected forecasts.

(c) Due to the Auckland Floods and Cyclone Gabrielle, the Council is undertaking further work to determine appropriate areas of Auckland for intensification on the basis of natural hazard risks. Until this further investigation has been completed, there is an element of uncertainty as to whether there will be sufficient development capacity in Auckland in the long-term. Bunnings is of the view that the Council cannot reasonably preclude greenfield developments based on current natural hazard risks, while continuing to investigate the feasibility and viability of further brownfield development as the preference, considering the effects those hazards have had on existing, at-capacity infrastructure.

24. PC78's plan enabled development capacity does not include the capacity available through Future Urban Zones. By removing some areas for development from Future Urban Zoning and increasing the reliance on infill developments without PC78 confirming to what extent infill developments will need to be restricted by, Council has placed far too much reliance on the capacity of the region's brownfield areas alone to provide sufficient long-term development capacity, as is required under the NPS-UD. Perversely, if the Draft FDS is confirmed before PC78 is finalised, PC78 will be required to have regard to the Draft FDS as currently proposed, which would create ongoing poor developmental outcomes.

25. If the Draft FDS fails to provide for sufficient development capacity, it will contribute to the growing number of ad hoc approaches to development, such as through private plan changes, to meet the shortfall in development capacity – which is the very issue the Draft FDS intends to avoid. Private plan changes are supplementary tools to ensure planning frameworks remain flexible and responsive to the changing needs of communities and the environment over time (noting that under the RMA Councils are otherwise only mandated to review and update their plans every 10 years or in accordance with national direction). Bunnings accepts that while the Draft FDS appropriately seeks to reduce the need to undertake private plan changes, the long-term nature of the Draft FDS (and 6-yearly review cycle of district plans) means that private plan changes will still play an important role in ensuring the planning framework remains agile and responsive to the changing needs of the community over time.

Management of natural hazard risks

26. The Draft FDS has also placed a strong emphasis on the New Zealand Coastal Policy Statement's directive to avoid development in areas of coastal hazard risk.[7]

27. Bunnings is supportive of the approach to generally avoid areas at high natural hazard risk. However, there are a range of existing incentives on developers to ensure that any future development occurs in a way that appropriately manages those risks. Council's approach of removing areas from development that could potentially still be development subject to appropriate mitigation measures, is an overly blunt solution to an otherwise multifaceted issue.

28. In developing its approach to managing development in areas subject to hazards, the Council has not meaningfully considered other incentives that would otherwise make developers build good, high-quality developments that address, manage, and mitigate hazards, such as more stringent building standards and insurance requirements. In some instances, developments in coastal risk areas are expected to improve risk outcomes for properties in those areas, such as where those new developments would fund or construct a seawall that would not have otherwise been viable.

29. Further work on a consistent, nationalised approach to managing development in hazard risk areas and managed retreat are also expected to occur through the new Climate Adaptation Act. It is critical that the Draft FDS does not preclude or undermine that further work and risk unnecessarily constraining development until an appropriate approach has been confirmed.

Procedural issues

30. Bunnings is concerned that there is insufficient information and time available to properly give consideration to a proposal of such significance. Bunnings considers that further time (beyond the July 31 extension) is required, given the scale and scope of additional work needed to address concerns arising from the Draft FDS and in order for the Draft FDS to align with the requirements and criteria of the NPS-UD. It is appropriate for the Council to defer the Draft FDS until such time as the next Long Term Plan is being developed and PC78 finalised, to ensure that there is consistency and workability across the region's key planning instruments.

31. While the Draft FDS is extensive in its policies and key considerations, the Draft FDS does not provide clear direction as to how those policies are to be implemented or achieved. In particular, while the Draft FDS contains a section regarding implementation, the Draft FDS's implementation plan was not included in the consultation documents. Given the implementation plan is a critical aspect of the Draft FDS, it is appropriate that the implementation plan should be released alongside the Draft FDS, as it is inherently linked to the Draft FDS.

7 NZCPS, Policy 25.

32. Given the significance the Draft FDS has on Auckland's future development planning, Bunnings considers that a more extensive and robust consultative period is necessitated, rather than the current process the Council has provided. To ensure that a proposal of such significance has been adequately consulted on, Bunnings seek that the Council hold a formal hearings process to provide the public with the opportunity to make further submissions and evidence to assist with deliberations.

Relief sought

33. Bunnings seeks that Council:

(a) the Draft FDS's consultation period under section 83 of the Local Government Act 2002 be extended to allow further work to be undertaken by the Council to identify areas appropriate for intensification;

(b) the Council delay the adoption of the Draft FDS to be in conjunction with the adoption of the next Long Term Plan and confirmation of PC78; and

(c) the Council prepare and release the Draft FDS's implementation plan for consultation, in conjunction with the Draft FDS for public consideration.

Next steps

34. Bunnings would be happy to meet with Council to discuss this submission.

Bryce Hutchison
Head of Property - NZ
Bunnings Limited

Future Development Plan 2023 #7948

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?

Disagree

Tell us why

Founders records its disagreement with the draft FDS' heavily weighted favouring of brownfield or existing urban areas for the focus of growth, on the basis of what are broad and in some instances inaccurate generalisations regarding the potential benefits of greenfield growth

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?

Disagree

Tell us why

See attached supporting evidence, specifically paragraphs 3.5 - 3.9

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?

Disagree

Tell us why

While Founders' supports this intent, it considers that larger development sites, often in greenfield areas, have greater ability to incorporate a low-impact environment-led management response to flood hazards. The appropriateness and cost of engineered solutions should be assessed on a case-by-case basis, rather than adopting a 'no development' blanket approach to managing hazard effects in greenfield development, as doing so risks leaving otherwise suitable land undeveloped.

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

Founders agrees investment in infrastructure is required, however Council should consider and encourage alternative funding propositions to deliver this infrastructure.
Founders considers a more flexible approach is required to enable developers to directly contribute to masterplanned infrastructure in order to unlock areas of growth in line with local growth nodes.

Other feedback

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

Founders suggests the draft FDS is premature and should await the outcome of PC78 and associated implementation of medium density residential standards and intensification policies that implicate urban growth and servicing priorities.

Founders opposes the strong bias set out in the draft FDS against greenfield development as a general starting point for accommodating future urban growth.

Founders generally supports the principles for guiding growth so long as fair recognition is given to the potential for greenfield opportunities to sustainably deliver growth in accordance with those principles.

Founders strongly opposes the suggestion that the draft FDS and any future versions would be enshrined as the only sequence of growth for Auckland.

Founders is concerned that the FDS provides inadequate reference to the WSP, a comprehensively prepared structure plan that should be relied on to expedite growth in Whenuapai coincident with the Westgate Metropolitan Centre, an FDS priority area.

Founders strongly opposes the suggestion that Whenuapai North (Stage 1) future urban area should be delayed at all, and especially not until after 2035 as currently proposed by the draft FDS. The Kennedys Road peninsula within Whenuapai North (Stage 1) can be serviced independently of the balance of Whenuapai with costs being met by developers and therefore should be bought forward to enable growth by 2027 or at least within the first tranche of development within Years 1-11.

FEEDBACK ON AUCKLAND COUNCIL'S

DRAFT FUTURE DEVELOPMENT STRATEGY 2023-2053

To: Auckland Council

Private Bag 92300, Victoria St West, Auckland 1142

Feedback on: Draft Auckland Future Development Strategy 2023-2035

Name: Founders Development Limited

1. Introduction

1.1. Founders Development Limited (**Founders**) was established with a focus on residential land development. It was a break away from Wilshire Group, who was established in 2014 for the purpose of undertaking residential development activities at scale, Founders specialises in greenfield subdivision and residential development in Auckland. Founders is committed to contributing to the response to critical housing demand through provision of additional serviced lots and/or dwellings for residential development to the private market, thus facilitating housing supply and enabling growth within Auckland.

1.2. Founders and its predecessor Wilshire Group has successfully undertaken the subdivision and development of several large land parcels in the region (including in Westgate and Mt Wellington) and has a proven track record in the delivery of quality residential outcomes.

1.3. Founders has an interest in land on Kennedys Road, in Whenuapai.

2. Background

2.1. The Whenuapai Structure Plan (**WSP**) prepared by Auckland Council dated September 2016 anticipated the land to the south of the NZDF Airbase (Areas 1A-E) within Stage 1 together with a pocket to the west at Kennedys Road (including Founders' site in Area 1F), with the balance of land to the west and north of the NZDF Airbase within Stage 2.

2.2. Stage 1 identified areas of residential and business land that could be development ready within 2-10 years' (2018-2026) by relying on existing infrastructure or where limited improvement was required. Stage 2 identified areas where future investment in new infrastructure was not anticipated until after 2027.

2.3. Consistent with the WSP, the Future Urban Land Supply Strategy (**FULSS**) prepared by Auckland Council dated July 2017 anticipated Whenuapai Stage 1 would be 'live zoned' between 2018-2022. Following this, Whenuapai Stage 2 was anticipated to be 'live zoned' between 2028-2032.

2.4. Accordingly, in 2017 Auckland Council progressed with preparing and notifying a plan change application to rezone Whenuapai Stages 1A-E (referred as Plan Change 5 (**PC5**)) from Future Urban zone to a combination of residential and light industry zones. Despite proceeding to hearings, and informal notification of a variation to PC5, after delay for various reasons, including to enable further aircraft noise testing and to further consider mechanisms for the funding and financing of arterial road upgrades, Auckland Council withdrew PC5 in June 2022.

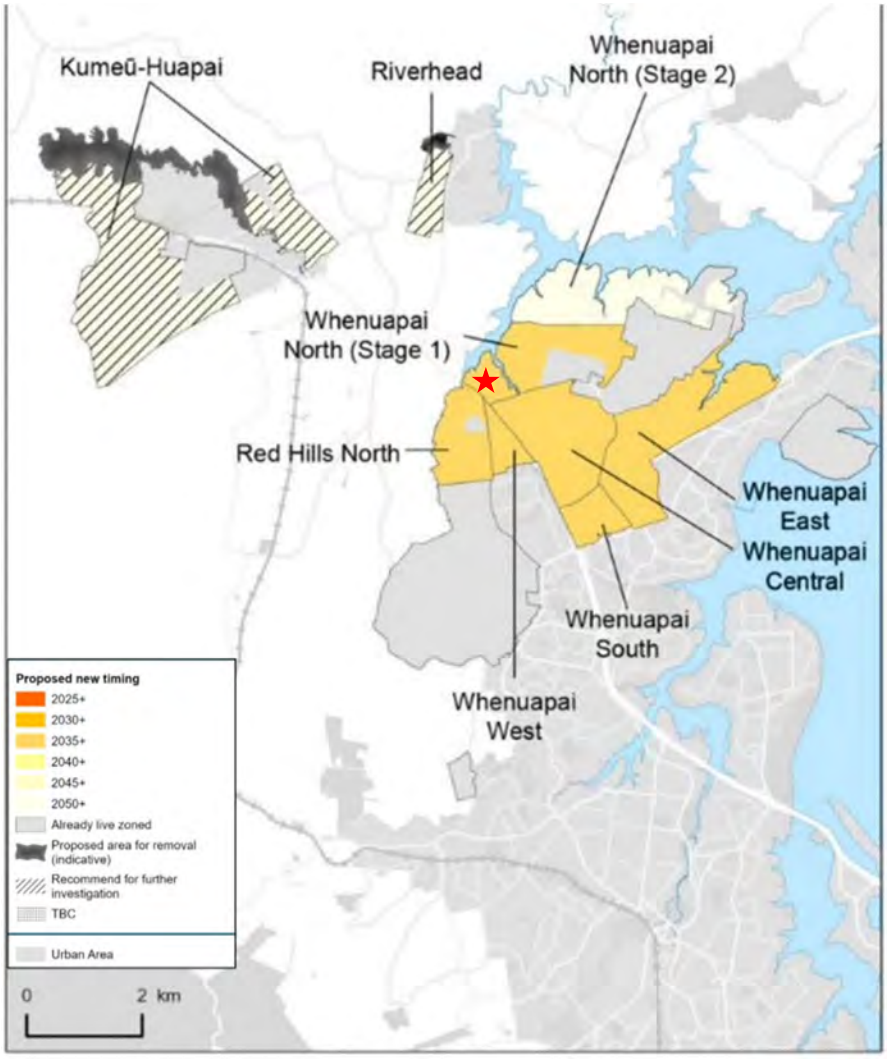
2.5. The Auckland Future Development Strategy 2023-2053 (**FDS**) provides a 30-year outlook for growth in the Auckland region, forecasting development across two spatial priority areas/tranches: Years 1-10 and Years 11-30.

2.6. Auckland Housing Programme areas including Mt Roskill, Mangere, Tamaki, the City Centre, and the Metropolitan Centres of Westgate and Drury-Opaheke are identified within Years 1-10. Future Urban zoned areas are identified within the later bracket.

2.7. Founders' landholding at Kennedys Road is zoned Future Urban in the AUP and is located within the 'Whenuapai North (Stage 1)' area in the FDS (Figure 1), pushing development ready status out from 2018-2022 under the FULSS to 2035+ under the FDS. The site is anticipated for low-medium residential activity under the WSP.

Figure 1 – Excerpt from FDS

(Figure 42 - Proposed timing and approach for Kumeū-Huapai, Riverhead, Whenuapai and Redhills future urban areas)



3. Feedback on Draft FDS

3.1. The draft FDS identifies that the advent of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act and the implementation of medium density residential zoning, alongside mandatory intensification of specific urban areas has required a "rethink" of how the Council plans for and services growth.

3.2. The draft FDS identifies five principles for guiding growth and development. Founders makes the following comments in respect of these principles insofar as they relate to Whenuapai North (Stage 1) in particular. At the outset, Founders records its disagreement with the draft FDS' heavily weighted favouring of brownfield or existing

urban areas for the focus of growth, on the basis of what are broad and in some instances inaccurate generalisations regarding the potential benefits of greenfield growth.

3.3. Further, Founders suggests that if the impetus for revisiting the city's growth strategy arises from the implementation of medium density residential standards and the other intensification policies set out in Plan Change 78 (and others) to the Auckland Unitary Plan (AUP), that it might be more appropriate to await the outcome of that process, rather than leapfrog it as the draft FDS has now done. PC78 has stalled and its future uncertain, as are its outcomes. To that end, it would appear the draft FDS is shadowboxing as regards the statutory context in which growth must be accommodated.

3.4. Notwithstanding, the following comments are made.

Principle 1 – Support greenhouse gas emissions

3.5. Principle 1(a) makes a broad assumption that greenfield development will result in a high 'vehicle kilometres travelled' (**VKT**), as compared to brownfield intensification. Principle 1(b) seeks to strengthen accessible, walkable and mixed-use neighbourhoods. Principle 1(c) seeks to bring jobs and people together, to reduce the VKT.

3.6. The Westgate Metropolitan Centre is identified as a key employment hub, and as being suitable for further development within Years 1-10 of the FDS. It follows therefore, based on the principles summarised above, that the land surrounding this hub would be programmed similarly, within Years 1-10 to deliver residential development at the same time as growth occurs within the Centre, providing a local catchment of employees and customers with a low VKT to travel between the residential catchment and the Centre.

3.7. At Appendix Page 27, the FDS states *"Westgate is linked with the Whenuapai future urban area which is expected to provide a range of employment opportunities. The delivery of infrastructure for Whenuapai future urban area supports unlocking business land much needed in the north-west to help address the shortage of employment land. Prioritising funding for delivery of a range of infrastructure projects in the short to medium term will ensure Westgate, including the Whenuapai area is well-prepared to take up the benefit of rapid transit. Projects needed to unlock this area include several local road and State Highway upgrades, pump station upgrades, wastewater projects and a water main project. In particular, the delivery of infrastructure for Whenuapai future urban area will support unlocking business land that is much needed in the north-west.*"

3.8. Founders agrees that the Whenuapai future urban area will support unlocking the Westgate business land, however the FDS does not appear to align residential growth and business growth simultaneously. Residential activity within Whenuapai will not come on-line until the decade following Westgate, and once 'live zoned' between Years 11-30 will take several years to consent, construct and handover residential dwellings to future

local employees and customers of the Westgate Metropolitan Centre. In the meantime, employees and customers will require greater VKT to service and access the Westgate Metropolitan Centre.

3.9. Founders considers therefore that, as a minimum, the forecasted residential areas of Whenuapai should be bought forward to the Year 1-10 tranche, hand-in-hand with local business growth in order for the FDS to deliver on Principle 1.

Principle 2 – Adapt to the impacts of climate change

3.10. Principle 2(a) seeks to avoid further growth in hazard areas, and states that "growth will not be enabled in known hazard areas where people, property or infrastructure would be exposed to significant risk".

3.11. While Founders' supports this intent, it considers that larger development sites, often in greenfield areas, have greater ability to incorporate a low-impact environment-led management response to flood hazards. The appropriateness and cost of engineered solutions should be assessed on a case-by-case basis, rather than adopting a 'no development' blanket approach to managing hazard effects in greenfield development, as doing so risks leaving otherwise suitable land undeveloped.

3.12. The corollary of discouraging residential development in flood hazard areas is that development should be encouraged in Future Urban areas that are not subject to flood hazards, facilitating residential development capacity in appropriate locations. For example, Whenuapai North is not subject to widespread flooding or inundation. Such hazards are limited to isolated locations which can be readily managed and are located outside of Founders' landholding as shown in Figure 2.

Figure 2 – Whenuapai North flood hazard map

(Founders' landholding as shown in red)



Principle 3 – Make efficient and equitable infrastructure investments

3.13. Principle 3(a) seeks to take a regional view to infrastructure investment and costs, Principle 3(b) seeks to make the best use of existing infrastructure, and Principle 3(c) seeks to make investment decisions that deliver on multiple outcomes.

3.14. Firstly, these principles assume that private development must be reliant on public investment to deliver the infrastructure that is required to facilitate growth and development. This does not recognise the role that private developers can play in funding and delivering infrastructure to service their own development, and in some cases to also facilitate, provide for or futureproof infrastructure capacity for the wider existing or future community, alleviating Council of this capital cost outlay.

3.15. Developers are often forthcoming to deliver the infrastructure that is required to enable development and welcome the opportunity to work with Council's infrastructure teams and CCO's to do so. Equally, developers acknowledge the requirement to pay Development Contributions to wider upgrades and would be eager to enter into an Infrastructure Funding Agreement with Council if it expedited the delivery of shared infrastructure to unlock a growth area.

3.16. These alternative funding propositions are not welcomed or encouraged by the FDS as, broadly speaking, Council considers this will result in the ad-hoc delivery of infrastructure. This is not the case in areas where extensive masterplanning, analysis and consultation have occurred, such as that undertaken by Council when preparing the WSP.

3.17. Secondly, the significant delays proposed in the FDS stem from Council's position that all infrastructure is required to be operational before the 'first cab can leave the rank'. As evidenced by the FDS, this approach will result in significant delays, holding up all development in the respective area while Council firstly funds, and then consents and

constructs, up front infrastructure in advance of development. As we have seen region-wide, this approach results in construction costs growing over time becoming more difficult for Council to fund as time progresses to the point where no upgrades occur as a result.

3.18. This does not factor in a staged approach that can remain integrated in respect of delivering smaller pieces of a wider infrastructure masterplan to be delivered in line with iterative growth over time, and/or better utilising IFA opportunities to fund infrastructure.

3.19. Instead, Appendix Page 27 provides a list of costly infrastructure, all of which is required to be in place before the FDS considers the area suitable for the 'full build out' of growth, including:

Whenuapai North (Stage 1)

- SH16 to SH18 Connections
- Brigham Creek Road upgrade
- SH16 -18 Upgrades
- North-west Rapid Transit
- Upper Harbour (SH18) Rapid Transit
- Trig Road Water Reservoir, North Harbour No. 2 Watermain Project
- Brigham Creek Pump Station Whenuapai Redhill Package 1
- Northern Redhills to Brigham Creek Wastewater Project
- Whenuapai and Redhills Wastewater Scheme

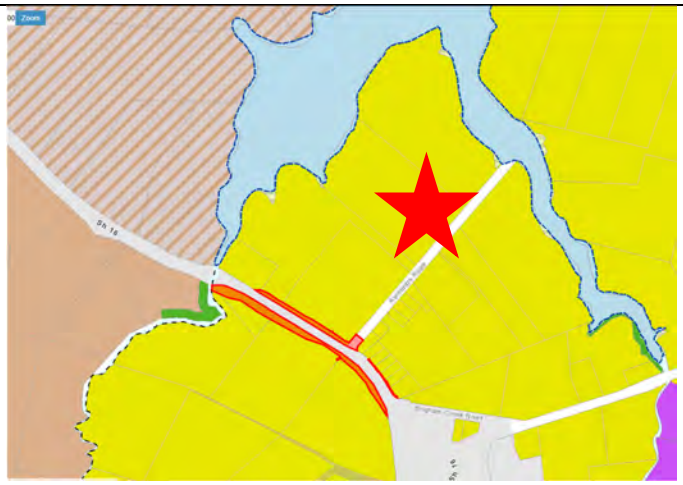
3.20. Each of the listed infrastructure projects are significant individually, both in terms of time and cost, but it is virtually impossible to expect Council to fund, consent and construct all of the above in a timely manner, based on previous track record. For example, the SH16 Brigham Creek-Waimauku upgrades have been funded since the 2021 RLTP, however the southern part of this NOR (relating to Whenuapai) is yet to be notified some two years' later, demonstrating the significant lead-in time, even when funding is secured.

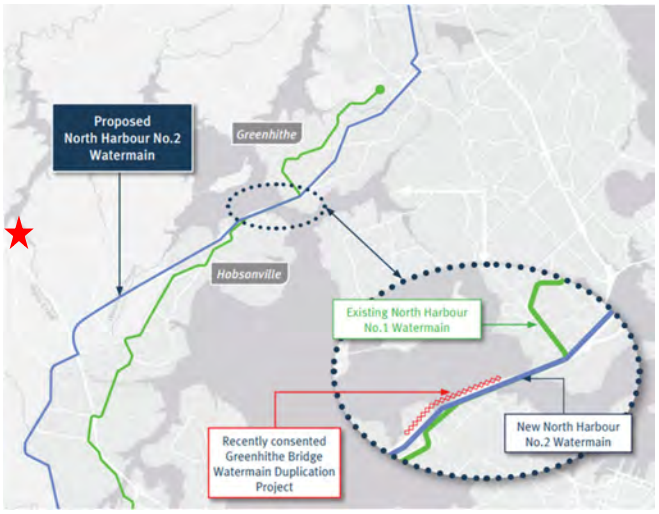
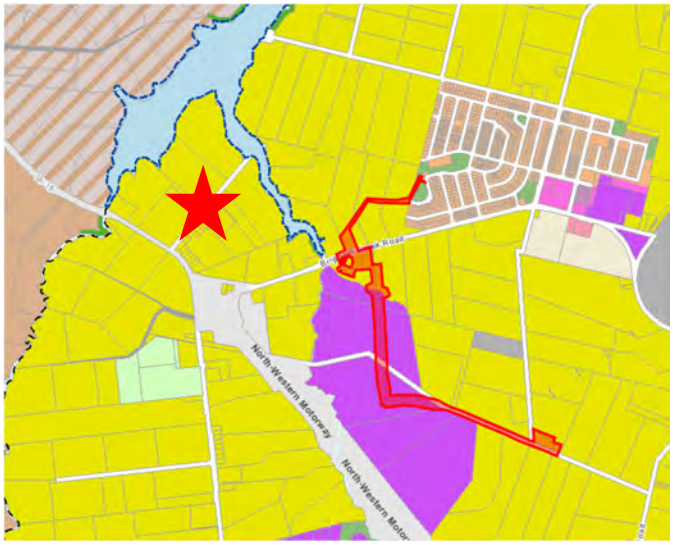
3.21. The FDS provides an opportunity to encourage developers and Council to achieve a coordinated funding and financing approach via an IFA to facilitate private contributions to expedite infrastructure provision. This would also facilitate a staged development approach to both infrastructure delivery and growth enabling short-term growth to occur in advance of the full build-out of all listed infrastructure, provided development is consistent with a wider structure plan.

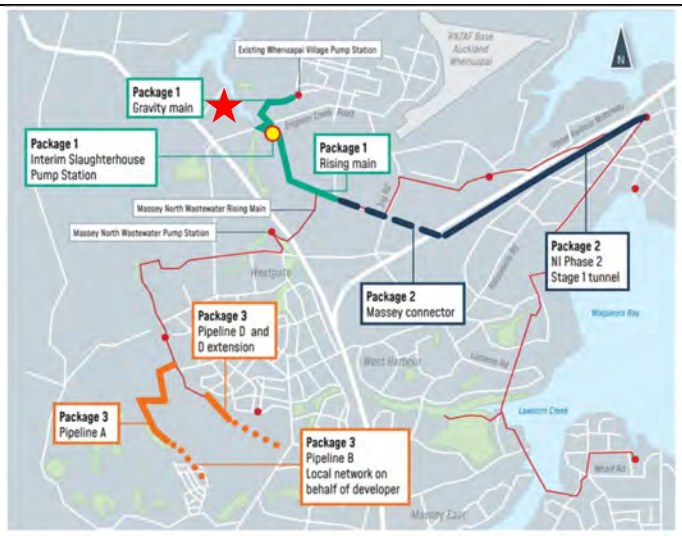
3.22. In the case of Whenuapai North (Stage 1), the western peninsula within this stage stands alone and is largely bound by SH16 and the estuary. As identified in the WSP, the largest constraint in this location is wastewater infrastructure, and provided this is delivered by a private developer, there is no need to delay growth. Preliminary transport engineering input confirms minor transport upgrades can be provided by a developer to mitigate traffic effects on SH16 until the wider upgrades occur. This enables iterative residential growth to support Auckland's housing supply, without jeopardising Council's wider delivery of infrastructure.

3.23. More specifically, the following comments are made in respect of the above-listed infrastructure relative to the development-readiness of Whenuapai North (Stage 1):

Infrastructure	**Comment**
SH16 to SH18 Connections	The draft FDS does not acknowledge the recent steps taken by Auckland Transport to support future integration of urbanisation and transport networks, specifically in the form of multi-modal arterial routes with active mode facilities and public transport priority in the recently lodged Notices of Requirement. We understand that the Supporting Growth Alliance has lodged an NOR application with Auckland Council to upgrade and widen SH16 between the northern end of Fred Taylor Drive (at the intersection with Brigham Creek Road) and Ngongetapara Stream, being the SH16 frontage of the Kennedy's Road peninsula, however the application is yet to be notified. The Regional Land Transport Plan 2021-2031 confirms these works are funded by Waka Kotahi ($137m) as part of the SH16 Brigham Creek-Waimauku upgrade, and construction is anticipated to be completed by 2027. It is anticipated the NOR will provide for active modes and improved connectivity between Whenuapai North (Stage 1) and Westgate to the south.

	
Brigham Creek Road upgrade	The Brigham Creek Road upgrade works do not adjoin the Kennedy's Road peninsula and are not required to enable development in this area accordingly. 
SH16 -18 Upgrades	The scope of these works is unclear; regardless the intersection of SH16 and SH18 is located some 2.5km to the south of the site and preliminary transport advice indicates that no upgrades of the intersection are required to facilitate development within the Kennedy's Road peninsula.
North-west Rapid Transit	Preliminary transport advice indicates these works are not required to facilitate development within the Kennedy's Road peninsula nor will it improve connectivity with the Westgate transport hub (but will facilitate public transport from Westgate to the CBD in the long-term).
Upper Harbour (SH18) Rapid Transit	Preliminary transport advice indicates these works are not required to facilitate development within the Kennedy's Road peninsula nor will it improve connectivity with the Westgate transport hub.

Trig Road Water Reservoir, North Harbour No. 2 Watermain Project	Currently under construction. 
Brigham Creek Pump Station Whenuapai Redhill Package 1	Watercare has lodged the NOR application for Package 1, however the application is yet to be notified, as shown in red below. Package 1 works relate to the northern end of the Whenuapai and Redhills Wastewater Scheme, being the location closest to the Kennedy's Road peninsula as shown in green below. Construction of Package 1 is due to be completed by the end **2025**. This provides wastewater capacity within the vicinity of the Kennedys Road precinct for private developers to connect to. 

	
Northern Redhills to Brigham Creek Wastewater Project	Refer Package 3 shown in orange above. These works are not relevant to future development in Kennedy's Road nor Whenuapai North (Stage 1) and should be removed from the list at Appendix 6 of the FDS.
Whenuapai and Redhills Wastewater Scheme	Duplication of above – delete this line item from Appendix 6 of the FDS.

3.24. As such, Whenuapai North (Stage 1), at least within the Kennedys Road peninsula, will be **development ready by 2027,** assuming Founders will connect the site to the Brigham Wastewater Pump Station. There is no need to hold back development until 2035+.

3.25. In summary, Founders considers a more flexible approach is required to enable developers to directly contribute to masterplanned infrastructure in order to unlock areas of growth in line with local growth nodes.

Principle 4 – Protect and restore the natural environment

3.26. Principle 4 seeks to protect, restore and connect ecosystems and to integrate the natural and built environment.

3.27. Comprehensive structure planning such as that undertaken in respect of the WSP can achieve these outcomes as greenfield developments often have land area to accommodate water sensitive design and to enhance the quality of wetlands. The outcomes sought to be achieved by Principle 4 are embedded in the National Policy Statement for Freshwater Management 2020 (which development must give effect to), and the regulations contained within the National Environmental Standards for

Freshwater 2020 ensuring that greenfield development will achieve Principle 4. Ecological assessments are widely acknowledged as being required as part of any greenfield development or subdivision with conditions of consent requiring management plans to protect and enhance ecosystems and habitats common practice. As such, the aspirations of Principle 4 can be readily achieved through specialist input at the structure planning and consenting stage of greenfield development. This is not therefore another reason to delay growth in future urban areas.

Principle 5 – Enable sufficient capacity for growth in the right place at the right time

3.28. Principle 5 seeks to discourage growth in areas not already prioritised by Council, despite the National Policy Statement for Urban Development 2020 (**NPS-UD**) clearly directing local authorities to be more responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is unanticipated by RMA planning documents or is out-of-sequence with planned land release (Policy 8).

3.29. The FDS is intended to determine the sequencing and timing for when a future urban area will be ready for development to commence, with structure planning providing the next level of detail to effectively integrate land uses with infrastructure provision. Section 1.4.7 of the Future Urban Areas Evidence Report (June 2023) (**FUA Evidence Report**) acknowledges that structure plans are required by the AUP to establish the appropriate pattern of land use and infrastructure, opportunities and constraints, the effects of urbanisation on (and connectivity with) neighbouring areas.

3.30. Neither the FDS nor FUA Evidence Report suitably acknowledge the WSP, an existing structure plan for Whenuapai Stages 1 and 2. While the land remains Future Urban in zone, there is a clear expectation of urban growth such that development in this area is not entirely unanticipated or out-of-sequence. Council undertook years of work and extensive public consultation to prepare and produce this structure plan. The FUA Evidence Report criticises private plan changes for the isolated view often taken relative to structure planning the subject piece of land. This is not the case for the WSP, which was Council-led and takes a wholly integrated and comprehensive view across the wider Whenuapai area, including its relationship to and connectivity with neighbouring communities including Westgate and Hobsonville.

3.31. The FDS states *"…future urban areas will be sequenced, with this sequencing linked to triggers dependent on when <u>all</u> the required bulk infrastructure can be provided."* The bulk infrastructure that is listed as being required in Whenuapai North (Stage 1) is extensive and as discussed above, not all of which is required to be implemented before development can commence in some areas. Specific to Founders, Whenuapai North

(Stage 1) can be serviced independently of the balance of Whenuapai and will development ready by 2027 with costs being met by developers, and is ~1km from the Westgate Metropolitan Centre and spatial growth area. There is no need to delay residential growth in Whenuapai North (Stage 1) to 2035+ therefore.

3.32. The NPS-UD does not require the respective local authority to fund infrastructure that is necessary to delivery out-of-sequence development. Plainly, the onus falls on the applicant/developer to deliver infrastructure that is required to service the development, as well as to provide/contribute to infrastructure that is identified as being required by a relevant structure plan or precinct plan. For example, the WSP identifies wastewater upgrades are required to unlock the Kennedys Road peninsular; Founders is willing to deliver and/or fund the northern end of this network accordingly.

3.33. To appropriately deliver the intended outcomes of Principle 5, the FDS should build on the work undertaken to date as part of the WSP to enable 'self-serviced' development to progress in line with growth local growth within the adjacent Westgate priority area.

Other matters

3.34. Finally, section 1.3.7 of the FUA Evidence Report states that highly productive land 'is a factor to be considered in terms of context for this report but is not a determining factor'. Clause 3.4 of the National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**) clearly excludes Future Urban zoned land from the NPS-HPL, which states *"despite anything else in this clause, land that, at the commencement date, is identified for future urban development must not be mapped as highly productive land."* Future Urban zoned land is clearly excluded from the NPS-HPL, and therefore should indeed be a determining factor when considering whether or not to facilitate growth.

4. Key concerns

4.1. Founders suggests the draft FDS is premature and should await the outcome of PC78 and associated implementation of medium density residential standards and intensification policies that implicate urban growth and servicing priorities.

4.2. Founders opposes the strong bias set out in the draft FDS against greenfield development as a general starting point for accommodating future urban growth.

4.3. Founders generally supports the principles for guiding growth so long as fair recognition is given to the potential for greenfield opportunities to sustainably deliver growth in accordance with those principles.

4.4. Founders strongly opposes the suggestion that the draft FDS and any future versions would be enshrined as the only sequence of growth for Auckland.

4.5. Founders is concerned that the FDS provides inadequate reference to the WSP, a comprehensively prepared structure plan that should be relied on to expedite growth in Whenuapai coincident with the Westgate Metropolitan Centre, an FDS priority area.

4.6. Founders strongly opposes the suggestion that Whenuapai North (Stage 1) future urban area should be delayed at all, and especially not until after 2035 as currently proposed by the draft FDS. The Kennedys Road peninsula within Whenuapai North (Stage 1) can be serviced independently of the balance of Whenuapai with costs being met by developers and therefore should be bought forward to enable growth by 2027 or at least within the first tranche of development within Years 1-11.

Signature



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Future Development Plan 2023 #7979

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?

Disagree

Tell us why
Obliterated quality of life.

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?

Disagree

Tell us why
Horrendous quality of life.

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?

Disagree

Tell us why

Show us the evidence of any of these assertions. Guarantee that you won't restrict momement of people in there so called risk areas.

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?

Disagree

Tell us why

Clean out the storm water drains! Ensure they are functioning & have capacity.

Other feedback

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

Fix the roads & footpaths. Address the potholes & tree root damage.

Turn down the bright led street lights. They are unnecessarily bright.

Stop constant construction of transmission poles.

Stop placing surveillance cameras everywhere.

Future Development Plan 2023 #8023

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Your feedback

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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?

Disagree

Tell us why

I do not agree with the way the developers are now dividing up land without the infrastructure put in place first , like developments were done 30 years ago , Roading , Sewer Water and Gas were all installed before lots were sold Roads are too narrow , are not straight enough to accommodate large traffic volumes in terms of extra lanes , that would be a result of many of these subdivisions proceeding and become a very large impost onto the ACC and therefore ratepayers . Even if ACC could borrow the money it has to be paid back . This cost should become part of what the developers pay for before they even release sections for sale . This would stop them picking areas that are off the beaten track far from services . Developers do not seem to be accountable , they simply pick the cheapest farmland and present a future 5 year plan to ACC and leave everyone else to deal with the financial mess they leave behind

Arable Land

Developers and land owners should not be allowed to cut farm and food growing land up , removing and selling the topsoil , and turning these productive farms as some proposals put forward for the Franklin / Karaka Area . Cutting up food growing land in Pukekohe will come back to haunt the people of Auckland into the future in many ways .

Green Space and Section sizes .

Auckland is lacking in Green Space so families can bring up their children in a healthy way . Proposed Sections sizes are far too small so families have the area they need to grow some of their own food and have areas for their children to run around in . The current parks in many areas are sometimes unsafe and parents are not happy allowing their kids to go to these places like it was 30-40 years ago . Everyone knows the neighbours business the houses are so close to each other

Proposals for Karaka .

We estimate that there is proposals in for up to 30,000 extra houses from the Papakura to Kingseat . This is doing everything backwards , Roads need to be 4 laned , curves removed , Bridges built Land acquired by ACC before any subdivision is built . Theres no internet , no sewerage , no water . Even the Drury Rd will have a dire effect of Karaka as cars will cross over from Drury Rd up Charles and Blackbridge roads . It takes 2 hrs to drive 6km to the motorway sometimes from Glassons Bridge and there is 5 huge subdivisions underway now as I pen this with no water , sewerage , Fiber , and the winding roads are challenging to say the least from Glassons to Papakura turnoff .
The end result of the above is that developers will expect the Govt and ACC therefore the ratepayers to front up to pay for this infrastructure which I estimate will cost $300m without Land acquisitions under the Public Works Act .

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?

Disagree

Tell us why
I dont agree that a Local Center is Karaka Village

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

Because of the anguish that this gives property owners , costs that it incurs to Council and the Govt and the anticipated effects of Climate change to 2025

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

Infrastructure needs to be built first , properties subdivided , property sizes increased and developers need to contribute substantially or pay completely for these costs , this will stop developers choosing cheap farmland far away from infrastructure to clip the ticket , leaving the mess the Ratepayers and ACC to take on further debt to rectify .

Other feedback

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

Future Development Plan 2023 #8041

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Your feedback

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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?

Disagree

Tell us why

We have serious challenges and capacity issues also for infrastructures in Urban Areas. Our city seriously needs more Greenfields. It is also much easier to design, engineer and fund infrastructure in Greenfields.

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?

Disagree

Tell us why

Again, our existing local centers are reaching out of capacity, we need more Greenfields developments.

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?

Disagree

Tell us why

Some of environmental hazards can be re-engineered in the Greenfield developments. The better approach will be detailed technical analysis to re-engineer the environmental solution and set up development criteria for the funders to work through

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?

Disagree

Tell us why

Where governments clearly do not have enough funding for the infrastructures, we should not stop private funders / land owners / developers to fund them. It is meaningless to priorities nature based infrastructure based on Council's opinion given the fact Council cannot fund them. Better for the funders to contribute to the formation of prioritizing sequence.

Other feedback

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

Continue on for both Urban / Brownfields and Greenfields developments. Pause or refine the FDS, engage more discussions with the stakeholders / developer industry to come up a more practical plan, especially for funding contributions.

Future Development Plan 2023 #8047

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Your feedback

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

Tell us why

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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?

The Tree Council
Tiakina Rākau • est 1986

Submission by the The Tree Council on Auckland Future Development Strategy 2023-2053

26 July 2023

From: The Tree Council
Contact: Dr Mels Barton, Secretary
PO Box 60-203, Titirangi, Auckland 0642
021 213 7779
info@thetreecouncil.org.nz

1. Introduction

1.1. Thank you for the opportunity to present The Tree Council (TTC)'s submissions on the **Auckland Future Development Strategy 2023-2053**.

1.2. These submissions are made by The Tree Council, an independent, voluntary organisation, a non-profit incorporated charitable society which has been serving the Auckland community since 1986 in the protection of trees and as advocates for the significant benefits and services that our trees and green spaces provide.

1.3. We wish to speak to our submission if that opportunity is provided.

2. Submission

How and Where Auckland Should Grow:

2.1. Auckland should grow upwards, not outwards. No more greenfield development.

2.2. Enable more intensification in areas with good public transport & near town centres, but must be done well.

2.3. Enable more high rise & less medium density infill - this is just reducing our green spaces and not achieving sufficient housing capacity so it is a lose-lose.

2.4. Higher, more dense development with greater amounts of green space & trees around them for everyone to benefit from.

2.5. Covering the whole city in medium density infill covering all our gardens with concrete & roofs will just lead to more flooding, more pollution & lower quality of life for residents.

2.6. The vast majority of growth should occur in existing urban areas. Stop creating new cities on the fringes. It just adds to the congestion and travel times & is poorly served with public transport & other infrastructure.

2.7. Prioritise enhancing town centres in areas like Manukau and Tamaki where investment has been less in the past to improve equitable outcomes.

2.8. Rezone the area around Drury and Pukekohe to prevent urban intensification and loss of our most productive food growing soils. This area is not suitable for development of a satellite town. It is too far out of Auckland, which means provision of adequate infrastructure is more expensive and difficult. Commuting into the city is long and difficult and will mainly be via car. This is unsustainable development and this area should be supported to continue to grow fresh food for Auckland and the high quality soils legally protected in perpetuity.

2.9. Private plan changes by developers should be opposed by council as they undermine strategic urban planning and are usually for development of greenfield sites outside the RUB and then cost all of us to provide the infrastructure.

2.10. Beware of suppressing economic activity by placing residential units among bars, restaurants, clubs and live music venues. This only leads to conflict (noise complaints), the closure of businesses & the loss of a vibrant night scene for the city. Separate these activities so that they can thrive while not upsetting people trying to sleep!

2.11. Ditto re heavy industry. Needs to be well served by public transport but not too close to residential areas to affect health and quality of life.

2.12. Enhance the connections for using public transport, cycling and walking between home, work, shops and entertainment to reduce reliance on cars and reduce congestion.

2.13. What public transport serves Warkworth? Why is this a node for growth? Where are the employment options locally? This is just going to create more cars coming from the north into Auckland! This is the opposite of sustainable development.

2.14. Encouraging brownfield re-development of existing areas without hazards is the most sustainable way forward. Ensure infrastructure is adequate to support intensification and encourage high intensity development surrounded by lots of green space with trees.

Nature Based Infrastructure

2.15. Support prioritising nature based infrastructure to better respond to climate change, but your list did not include trees! Trees are the best natural infrastructure our city has, with mature trees providing multiple benefits that are well established by literature and worth millions to our cities - and yet they are not protected and are being removed daily in the race to intensify.

2.16. Prioritise and positively encourage nature based infrastructure (retention and planting of trees & green spaces) rather than hard infrastructure in developments.

2.17. Aim to achieve the 3:30:300 rule (everyone can see 3 large trees from their home, every neighbourhood has 30% tree canopy coverage, and it's only 300m to your nearest park or green space).

2.18. Tree protection is needed now or we will have lost all the large trees on private land in Auckland within a couple of decades - and we can never get them back. Positive legal protection of trees, historic buildings, character areas must be in place before an area is zoned for intensification, or all these assets will be lost.

2.19. Protecting existing areas of native vegetation and enhancing their scale and health is very important.

2.20. Large trees need protected space in which to grow. These are the trees that provide the services & benefits we need to treat stormwater and air pollution etc. New plantings of trees too close to buildings in new infill developments are pointless as they will never be allowed to grow to maturity & will be removed as soon as they conflict with the buildings - which they are bound to do when planted so close to them.

Avoiding Hazards

2.21. Areas prone to flooding, overland flow, landslips and coastal erosion are avoided and not subject to intensification. No more consents should be issued for development or re-development of properties in areas zoned for flood risk. Prioritise identification of hazards with changes due to climate change the driving factor. Agree that the area around Kumeu should not be intensified and probably should be rezoned to rural.

2.22. Managed retreat is planned in areas of greatest risk with landowners compensated for moving to other safer areas. Create parks and plant trees to replace housing in areas of risk.

2.23. Do not develop or intensify areas until the required infrastructure to support that level of development is already in place. Otherwise hazards like flooding are increased and may occur in areas not previously considered hazardous due to under capacity of the stormwater network or congestion of roads if public transport is inadequate.

Future Development Plan 2023 #8064

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Your feedback

Focusing growth

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

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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

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

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

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

Other feedback

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

Future Development Plan 2023 #8080

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Disagree

Tell us why

Please refer to attached submission

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Disagree

Tell us why
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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?

Other

Tell us why
Please refer to attached submission

Other feedback

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

Please refer to attached submission.

WINTON

DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY SUBMISSION

TO:	Auckland Council ("**Council**")
SUBMITTER:	Winton Land Limited ("**Winton**")
SUBMISSION ON:	Draft Auckland Future Development Strategy ("**Draft FDS**")

Summary

1. The Draft FDS proposes significant changes to the plans for how and where Auckland is to grow over the next 30 years. Winton is actively involved in land development in Auckland (including resource consent and private plan change processes) and is a regular and sophisticated user of the Resource Management Act 1991 ("**RMA**"). We have successfully developed over 500 ha of carefully planned high quality residential neighbourhoods throughout New Zealand and the Auckland region.

2. Winton is also the owner of a large block of land at Cosgrave Road, Takaanini which is zoned Future Urban ("**Takaanini Land**") which has been identified by the Council as "development ready" in the next couple of years. Winton is currently in the pre-application phase of a private plan change request to live zone the area.

3. Winton opposes the Draft FDS and considers it fails to comply with key requirements of the National Policy Statement on Urban Development 2020 ("**NPS-UD**").

4. The Draft FDS:

   (a) does not provide for "sufficient development capacity" as that term is defined in the NPS-UD and places too much reliance on intensification anticipated to be enabled through Plan Change 78 ("**PC78**"). This is despite PC78 being in its infancy and the outcomes of that process not yet determined. The Draft FDS:

      (i) overestimates the capacity of Auckland's existing urban areas to meet expected demand on the basis of an incomplete and inaccurate evidence base; and

      (ii) underestimates the need for greenfield development to meet Auckland's expected housing and business land demand over the next 30 years;

   (b) has not been prepared on the basis of an adequate and complete Housing and Business Capacity Assessment ("**HBA**");

   (c) does not provide for well-functioning urban environments by failing to adequately consider the infrastructure constraints within existing urban areas, and the significant opportunities that greenfield development can provide for well-integrated development;

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PO Box 105526, Auckland 1143

(d) does not give adequate consideration to the available funding mechanisms for new greenfield development and creates confusion and uncertainty as it is inconsistent with Auckland's current infrastructure strategy, which anticipates investment in new and expanded infrastructure; and

(e) applies overly blunt principles to development in areas subject to natural hazard risks and takes an overly cautious approach to potential natural hazards.

5. Preparation of the Draft FDS has been rushed. More work must be undertaken by Council to properly consider which areas of Auckland are appropriate for future growth. More work is also required to ensure that there is sufficient development capacity for both housing and business land provided in the region in the next 30 years. The adverse implications of the Draft FDS are significant.

6. Winton seeks:

(a) the Draft FDS consultation period under s83 of the Local Government Act 2002 be extended to allow further work to be undertaken by Council to identify areas appropriate for intensification;

(b) meaningful consultation be undertaken with the developer community in relation to the Draft FDS such that key principles be agreed including in relation to sufficient land being released at the appropriate time to cater for expected demand, infrastructure provision and management of natural hazard risks;

(c) that Council pause the current programme on the Draft FDS and delay the adoption of the Draft FDS until further work has been undertaken by Council to identify areas appropriate for intensification; and

(d) the Takaanini Land be clearly identified in the final Auckland Future Development Strategy as a committed growth area that is development ready in the 2023-2027 time period.

NPS-UD

Key statutory requirements

7. The NPS-UD provides the legal basis for the Draft FDS.[1] The Draft FDS must be prepared every 6 years and in time to inform, or at the same time as, Auckland's next long-term plan,[2] which we understand is being updated in 2024. Once the FDS is prepared, Council will be required to have regard to it when preparing or changing RMA planning documents.[3] On that basis, it has the potential to significantly influence RMA decision making processes.

8. The NPS-UD also sets out a prescriptive criterion of sources of information that must be considered in informing the Draft FDS. This includes the most recent applicable HBA, consideration of different spatial scenarios for achieving the purpose of the FDS, the relevant long-term plan, infrastructure strategy, and other relevant strategies and plans, feedback from this consultation, and every National Policy Statement or relevant national policy required or issued by legislation.[4]

1 NPS-UD, Part 3, Subpart 4.
2 NPS-UD, clause 3.12(1).
3 NPS-UD, clause 3.17.
4 NPS-UD, clause 3.14.

9. These requirements need to be considered against the overarching purpose and direction of the NPS-UD, which is to ensure there is sufficient development capacity for housing and business land to meet expected demand in New Zealand. The NPS-UD's first objective is to provide for well-functioning urban environments, which enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. This is fundamental to the application of the NPS-UD and development of the Draft FDS.

Providing for sufficient development capacity

10. The Draft FDS must set out how Council intends to provide at least "sufficient development capacity" for housing and business land to meet expected demand in the short term, medium term and long term.

11. For housing, capacity must be provided to meet expected demand in both existing and *new* urban areas.[5] In order to be considered as "*sufficient*" development capacity, it must be plan enabled, infrastructure ready, feasible and reasonably expected to be realised and meet the expected demand plus the appropriate competitiveness margin.[6]

12. However, the overall effect of the Draft FDS will be to fundamentally slow down, defer or remove future development areas as being identified for future urban development which is entirely inconsistent with the purpose of the NPS-UD and purpose of the Draft FDS. The approach suggests that, at least until the 2030s, the Council thinks that the vast majority of Auckland's expected demand for housing and business land can be successfully managed solely within existing urban areas.

13. This approach appears to be based on a number of assumptions and an evidence base that is fundamentally flawed and incomplete. For example:

    (a) The Draft FDS estimates that the total plan enabled net housing capacity for Auckland is 2,345,500 (which includes proposed PC78 enabled residential capacity with all qualifying matters applied).[7] This is an over-reliance on the outcome of a plan change process that is not yet determined. It cannot also be said that the capacity enabled through PC78 is all "feasible" given realisation of that capacity requires existing buildings to be demolished and a site redeveloped. Realisation is largely dependent on a landowner wanting and having the capability to maximise the development potential of their property.

    (b) The Draft FDS has been prepared on the basis of an inadequate and out of date HBA. The HBA does not include any assessment of business land capacity and contains different capacity assumptions to those used in the Draft FDS.

14. By removing and delaying some areas for development from future urban zoning and increasing the reliance on infill developments through the Draft FDS, Council has placed far too much reliance on the capacity of the region's brownfield areas to provide sufficient development capacity, as required under the NPS-UD.

15. The capacity assumptions relied on by Council in preparing the Draft FDS significantly overstate the position. By removing greenfield areas earmarked for future urban development, housing supply and type will be constrained which will escalate the price. This will result in housing becoming more

5 NPS-UD, clause 3.2(1)(a) and (b).
6 NPS-UD clauses 3.2(2) and 3.3(2).
7 Draft FDS at page 29 and Appendix 4.

unaffordable for a significant portion of the community, which is exactly what the NPS-UD seeks to avoid. The primary purpose of the Draft FDS should be to ensure there is sufficient development capacity in the short, medium and long term. In its current form, it does not do this.

16. Natural hazards work is also still being undertaken by Council following the Auckland floods and Cyclone Gabrielle. Until this further investigation has been completed, there is a significant element of uncertainty as to whether there will be sufficient development capacity in Auckland in the long-term. It cannot be the case that greenfield areas are being precluded for future development on the basis of natural hazard risks now, while brownfield areas continue to be investigated. These risks (and corresponding impacts on where development capacity is enabled) must be considered holistically.

17. A range of areas identified for intensification in PC78 are subject to challenge, including to enable a lower level of intensification (or no intensification) on the basis of qualifying matters. Significant parts of PC78 are also currently on hold.

18. Precluding or delaying areas for future development in the absence of an accurate and reliable evidence basis is unreasonable and inappropriate and will also have significant consequences both for housing and business land availability (and cost) in Auckland.

Approach to managing natural hazard risks

19. The Draft FDS has also placed a strong emphasis on avoiding further growth in areas exposed to hazards. Although Winton is supportive of an approach to generally avoid areas of high natural hazard risk, there are a range of existing protections and incentives on landowners and developers to ensure that any future development occurs in a way that appropriately manages those risks.

20. Council's approach of blacklisting areas that could potentially be developed on the basis of natural hazard risks, is overly blunt and ignores the multiple engineering solutions available to developers to manage those risks. As long as new development is accompanied by appropriately designed and tested engineering solutions paid for by the developer, it is not necessary, nor is it appropriate, to constrain development based on a perception of a flood risk or geotechnical risk.

21. Council must consider other incentives on developers to build high-quality developments that address, manage and mitigate hazards (for example, building standards, or insurance). In addition, further work on a consistent national approach to managing development in hazard risk areas, and managed retreat is also expected to occur through the Climate Change Adaptation Act. It is critical that the Draft FDS does not preclude or undermine that future work by constraining development in the interim.

Infrastructure funding constraints

22. Under the NPS-UD, development capacity is considered "infrastructure ready" if:[8]

    (a) in relation to the short term, there is adequate existing development infrastructure to support the development of land;

8 NPS-UD, clause 3.4(3).

(b) in relation to the medium term, there is adequate existing development infrastructure available to support the development of land or funding for that adequate development infrastructure has been identified in the long-term plan; and

(c) in relation to the long term, funding for adequate development infrastructure has been identified in the long-term plan, or the development infrastructure to support the development capacity is identified in the Council's infrastructure strategy.

23. The Draft FDS appears to be based on the premise that infill development utilising existing infrastructure is cheaper than greenfield development and to be preferred in the short, medium and long term.

24. This is simplistic. Infrastructure investment is a complex challenge that requires a good understanding of development needs in the short, medium and long term. While new greenfield developments may have higher infrastructure costs upfront in the short term, those are then paid for over time through development contributions, which can provide more significant and cost-effective benefits over the longer term. Just recently the Council changed its development contributions policy to provide for a longer-term horizon for funding of infrastructure in high priority growth areas – it has the tools available to provide this infrastructure in greenfield areas with prudent planning.

25. In many cases, brownfield development can be subject to the same, or more significant infrastructure constraints. Many brownfield areas are already over-capacity, which can impact the feasibility for future upgrades (and therefore, tying into the development capacity of an area), which should urge Council to exercise more nuanced decision-making in relation to infrastructure investment.

26. Aside from cost, the Draft FDS also fails to recognise the other significant benefits that greenfield development capacity can provide, including:

(a) opportunities for integrated, master-planned developments that better utilise land for open space and community areas, active transport modes, and other engineering;

(b) opportunities for new infrastructure that is better designed to deal with flooding and extreme weather events; and

(c) provision of a greater variety of housing choices to meet the needs of the communities, which is a key focus in the NPS-UD. Similarly, the needs of industrial and other commercial development will be very different to other residential land uses and arguably face greater supply challenges through infill while also exacerbating reverse sensitivity effects on existing uses.

27. While the Draft FDS has an outlook purportedly over the long-term with regard to its principles around infrastructure funding, Auckland's most recent infrastructure strategy clearly anticipates significant investments in infrastructure are required to meet the demands of our growing communities. This signals that long-term development capacity is infrastructure ready, despite the Draft FDS suggesting otherwise. Given the region's most recent funding decisions have accounted for long-term new infrastructure investment, the approach under the Draft FDS is misaligned with Auckland's long-term plan, infrastructure strategy, and the key purpose and requirements of the NPS-UD.

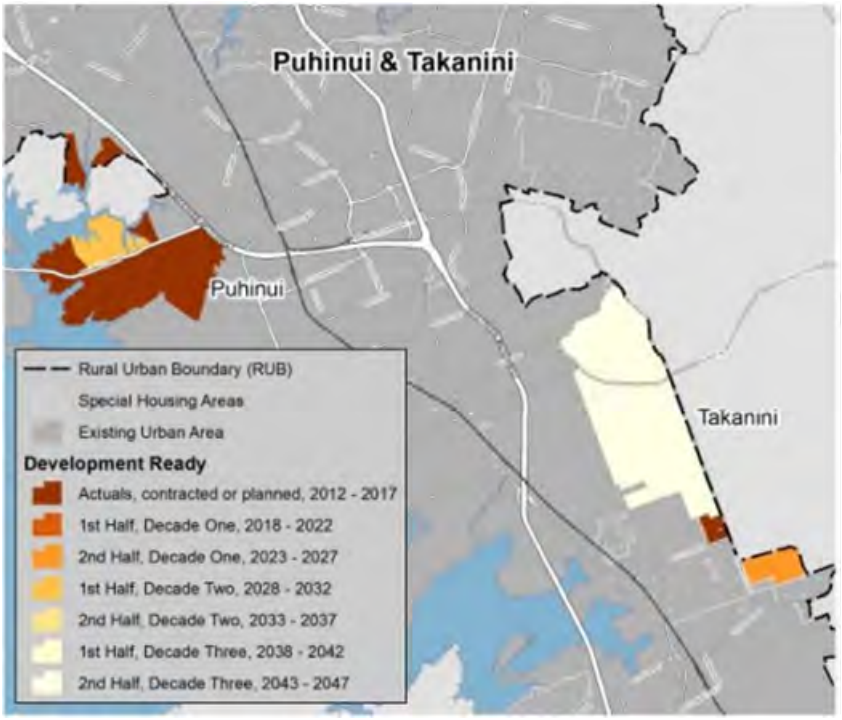
Well-functioning urban environments

28. As currently proposed, the Draft FDS does not give effect to the objective of the NPS-UD to provide for well-functioning urban environments. The Draft FDS fails to appropriately consider options that achieve well-functioning urban environments, in terms of providing for a range of housing options (both brownfield and greenfield developments), and the ability to ensure new development is well integrated with infrastructure, community spaces and green open spaces, and active transport modes. There is naturally less scope to achieve this integration through infill, as development operates within the constraints of existing, and often poorly planned, urban areas.

29. The NPS-UD expressly recognises the need for a combination of greenfield and brownfield development to provide for well-functioning urban environments and different housing options. In achieving the purpose of the NPS-UD, the Council must undertake a balanced consideration to greenfield development and take into account the significant opportunities these can provide to achieving well-functioning urban environments over the medium and long-term.

Takaanini Land

30. Winton's Takaanini Land is currently zoned Future Urban in the Unitary Plan. It is also identified in the Future Urban Land Supply Strategy ("**FULSS**") as being "development ready" by 2023-2027:



31. Winton's Taakanini Land is shaded orange in the above image from the FULSS.[9]

32. Astoundingly, the Draft FDS proposes to delay the timing for the Takaanini Land being "development ready" to 2050+ based on the timing for Mill Road and the frequent transport network. Not only is

9 Future Urban Land Supply Strategy (Auckland Council, July 2017) at page 16.

this inconsistent with the requirements in the NPS-UD, it also represents a major departure from Council's long-standing plan to live zone this area between 2023 and 2027.

33. Winton is in the process of lodging a private plan change request with Auckland Council to rezone the Takaanini Land ("**Plan Change**"). The Plan Change seeks to rezone the majority of the land to be MHU, consistent with the proposed surrounding residential zoning. The Plan Change also provides for a neighbourhood centre to service the community, provides a block of open space and extension of the Awakeri wetlands conveyance channel and provides protection for the high-pressure gas line which passes through the Takaanini Land.

34. The Plan Change land will therefore be subject to the full AUP standards around subdivision, trip generation and transport controls, management of natural hazard risk, stormwater management including capacity and quality. The Plan Change includes a funding commitment to build and implement the conveyance channel and landscape it to the same standards as the Stage 1 Awakeri wetlands and includes a commitment to transport upgrades within the Cosgrave Road/Mill Road corridor.

35. The most significant infrastructure commitment by Winton to the Takaanini Land is the proposed delivery of the conveyance channel which is designed to manage flood prone issues within the Takaanini East area. The Council has completed a detailed stormwater management strategy for the area, which identified the appropriate method of control was through construction of a stormwater conveyance channel. Stage 1 of the Awakeri wetlands has already been completed and the land for stage 2 has been designated prior to Winton owning the Takaanini Land.

36. The Takaanini Land is development ready in all aspects. However, the Draft FDS proposes to substantially defer the long-standing commitment by Council that the Takaanini Land will be live zoned between 2023 and 2027. This has been proposed without any consultation with Winton. Through the Draft FDS, the Council has not provided any logical or rational justification for deferring the Takaanini Land for development in the timeframes originally committed to.

37. It is nonsensical that an area that has long been planned for and invested in be proposed to be deferred for urban development until 2050 and beyond, particularly against the backdrop of a willing developer with a Plan Change ready for lodgement to advance that area's development and fund any remaining necessary infrastructure. To defer the timing for this land being development ready is completely contrary to the key drivers of the NPS-UD and purpose of the FDS.

Broader implications of the Draft FDS

Integrity of Council planning documents undermined

38. The Draft FDS has significant adverse financial implications for developers across the region and fundamentally undermines the confidence Winton has in the integrity of Auckland Council planning documents.

39. Developers have significantly invested in land in reliance on Auckland Council planning documents like the Auckland Plan 2050, the FULSS, the AUP and Structure Plans. These planning documents have been well tested, subject to extensive public consultation (and in some cases a hearing before independent commissioners) and are based on a suite of expert evidence. The same cannot be said for the Draft FDS.

40. To now preclude or defer areas for future urban development through the Draft FDS represents a fundamental departure from long-standing Council policy and severely undermines the integrity of Council's other long-term strategy and planning documents. This has huge implications for the future development of Auckland, which relies on private developers purchasing land in reliance on Council's planning documents to meet expected housing and business demand.

Changes to the RUB should remain a district plan level control

41. Winton also has concerns with the suggestion by Council through its approach that the Rural Urban Boundary ("**RUB**") should be a *regional* rule and therefore only able to be modified effectively by the Council through a public plan change. This approach was tested through the proposed AUP hearings process, and the Panel found that a plan change to the RUB should remain a *district* matter and it was inconsistent with the RMA to do otherwise:[10]

> "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.
>
> […] 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. […]"

42. Council's track record of implementing plan changes under the FULSS is also very limited. The only plan change Winton is aware of where Council has promoted giving effect to the FULSS was in Whenuapai. However that plan change was subsequently withdrawn. Plan changes giving effect to the FULSS are essential to provide for growth in Auckland. Ultimately, the Council relies heavily on private developers to initiate and fund these plan changes.

Engagement and procedural concerns

43. Clauses 3.15(f) and 3.16(2)(a) of the NPS-UD state that when preparing or updating a draft FDS, or when undertaking a review of an FDS, the local authority must engage with "*the development sector (to identify significant future development opportunities and infrastructure requirements)".*

44. Auckland Council has not engaged with Winton on the Draft FDS and it appears that the consultation with the development sector has been very limited. A lack of extensive "development sector" knowledge has significantly skewed the Council's understanding of the availability of urban land now and in the foreseeable future to service the needs of Auckland. Winton considers the consultation on the Draft FDS has been rushed, flawed and not in compliance with the requirements of the NPS-UD.

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

45. There has also been insufficient information and time available to properly give consideration to a proposal of such significance. The Draft 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.

46. Further time (beyond the July 31 extension) is required, given the further work Council needs to do in order to demonstrate the Draft FDS is achieving the criteria of the NPS-UD.

47. Winton wishes to speak to this submission.

Duncan Elley
General Manager – Project Delivery

Future Development Plan 2023 #8104

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Your feedback

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

Disagree

Tell us why

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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.

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Disagree

Tell us why

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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.

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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

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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?

Other

Tell us why

see the submission

Other feedback

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

Submission to Auckland Council on the Draft Future Development Strategy 2023 ("FDS")

As an owner of Future Urban Zone ("Future Urban") land in Auckland, I make the following submission in response to an invitation to comment on the Auckland Council Draft Future Development Strategy 2023 ("FDS").

I **strongly oppose** the Council's approach to the FDS for the following reasons:

1. Removing the future urban zones and concentrating developments on brownfields will completely break the already tipping balance and is highly likely to create significant adverse societal impacts. To have developments focussed on brownfields will also turn Auckland streets into a huge construction site for many years to come – streets that are already densely populated. This would result in a terrible environment for the residents and also increases hazards due to these construction works for Aucklanders.

   The existing Unitary Plan has already considered the varying characteristics of each suburb and has the building density set to a maximum level, where housing supply and environmental impact is balanced. Current high-density areas are already experiencing significant/unresolved issues; little space between neighbours, single garage or no parking causing roadside parking to increase which causes traffic jams, no safe space for kids to play on the property, dangerous road conditions for pedestrians and drivers alike. All these issues are only becoming worse with the amount of tall, high-density terrace/town houses being permitted for construction in these areas.

2. Existing public service facilities in current urban areas, including but not limited to public medical centres, libraries, swimming and fitness centres, public green places, will bear pressure beyond the scope of the proposed FDS regulations, and the possibility of expansion under existing urban conditions (land size, traffic conditions etc) is extremely low. This will cause a lot of inconvenience for existing users and even a shutdown for an extended period of time.

   From the cost and convenience point of view, the construction and development of new public facilities in new urban areas will allow for even distribution of the pressure on existing urban areas. It is a more cost-effective and more feasible way to use taxpayers' money as these newly developed areas will be better constructed and more aesthetically designed to provide quality-of-life improvements for Aucklanders including better irrigation systems, public infrastructures, and public facilities.

3. From an investor's perspective, funds put towards areas with a future are much more attractive. With businesses and investment, the government will also receive more tax funding, this can further be put into support of better infrastructure such as new underground power lines instead of the dangerous overhanging power pylons. This deferral or restriction to the current Future Urban development will not only cost investors time and money, but will also cost the council money as well as confidence from the investors.

4. The Council has already put time and money into effectively investigating and planning so that the Unitary Plan can be put into effect, this includes consideration for the population growth in the area, schools, town centres, kindergartens, retirement villages, road planning, public transport, drainage as well as accommodation development. We should be able assume that council's decision to zone the area as Future Urban Zone years ago was after thorough consideration.

   As the population of Auckland continues to grow, there will inevitably be a shortage of affordable housing. Promoting the development of Future Urban areas by creating new centres of living not only provide job opportunities, but also affordable living for those in the locale. Whereas if this is reconsidered now, it would be a waste of taxpayers' money to do another review when the current Auckland area becomes heavily overpopulated and these areas become sorely needed again. There is no reason for the Council to waste money and time to change the original plan with only just 6 years from effect. Money and resources should be focussed on upgrading existing infrastructure which Auckland Council has always promised but failed to carry out.

5. Local schools are also have full capacity and will not fulfil the schooling requirements of future residents should population density increase in these areas. Schools are already facing classroom space shortage, shortage of teachers, and families within the school zones need to be put on waiting lists for enrolments which evidences that the population density has reached a limit under current infrastructure capacity. Existing school resources have been unable to cope with the increase in the school-age population brought by high density development in the existing urban areas, and the educational resources provided by the government cannot match the consequences of high density development. For example, Hobsonville Point Primary School now requires an application queue two or more years in advance, and Chapel Downs Primary in Flat Bush already has more than 50 students per class. The teachers are unable to identify individual students let alone provide effective student-teacher interaction if class size exceeds a certain number. This issue persists and is common in schools in high density urban areas. In view of the limitations of built urban areas, the possibility of expanding pre-existing schools is low and extremely challenging. The only way is to increase the construction of new schools in new urban areas to reduce the pressure on pre-existing education resources.

6. The recovery of brownfield to become usable land only has two possible resolutions, money spent on sterilising and recovery, or leaving the area to naturally recover over an extensive period of time. Infrastructure is the same, the replacement or installation of new systems into the area to support development does not change between brownfield and greenfield. Furthermore, brownfield is not currently attractive towards investors, nor would it be attractive towards home owners if they are told that the area was a contaminated, waste disposal or dump site.

   Brownfield intensification will cost the council a lot less if left to decontaminate naturally over a longer period of time. We are fairly certain that developers will not be keen towards putting funds into decontamination of a property when they can invest

into a property that does not have these issues, this is why the geo-technical report exists in the first place.

7. The Council proposes to remove four areas for urban development (down zone future urban land) because of hazard risk (in whole or in part). What are the hazards risks and have these areas been identified? Does this hazard risk have any causal effect on other areas? Investigation should be focused on areas where there is high risk of flooding. Increasing the density of housing in low-risk areas and decreasing the number of houses in flood-prone areas would make sense both ethically and economically, this is a good direction for the general population as it provides for new safe and sanitary living conditions.

   Impacts of natural hazards on future urban land do exist, especially in high-density brownfield zones. Due to the dense population, green areas have drastically reduced. Current drainage pipes are unable to process large amounts of rainwater and sewage as evident with recent floods. The damage caused by these recent events is directly related to the loss of green space due to the overdevelopment of brownfield sites. The FDS plan will only increase the pressure on existing infrastructures to withstand future natural hazards which would cause far more potential losses and heavier consequences in the future.

8. The FDS provides a trigger based approach to greenfield development. It's unclear if all infrastructure projects need to be implemented prior to a change of land zoning or is a staged approach. This is not a reasonable consideration, after the zoning has been changed, infrastructure projects should be implemented so as to support further development in those Future Urban areas where investors have put money into. A staged approach after the zoning change is reasonable as the expansion of Auckland goes outwards.

   Additionally, the FDS will form part the Reginal Policy Statement which poses a risk that all future private plan changes can be rejected if they don't align with the FDS especially around infrastructure triggers. These infrastructure rules should have already been considered during the previous Unitary Plan assessment. This should be a united decision and not one that is solely controlled by FDS, as there will be believers that emphasis on brownfield recovery at the cost of the council/government is more effective that upgrading or installing new infrastructure to greenfield, as previously mentioned developers would not be keen and neither would taxpayers.

9. Since the Unitary Plan came into action commencing 15 November 2016, certain regions have been zoned as Future Urban land under this plan, which greatly increased the CV of these areas and subsequently increased the respective land rates. As a result, landowners of these Future Urban land have paid more in local taxes over the years than what is required for the current municipal conditions in these areas. If the government wants to change this Unitary Plan, the overpaid land taxes starting 15 November 2016 must be refunded to these landowners.

Due to the increased CV after these regions were zoned as Future Urban land under the Unitary Plan commencing 15 November 2016, the housing price in these areas also rose sharply. Some individuals have already purchased property and land in these Future Urban land at high prices. The housing market prices are greatly affected by CV; therefore the government must compensate the existing landowners in the Future Urban land under the current Unitary Plan for the loss caused by the fall in house prices as a result of removing these areas as Future Urban land.

10. Restrictions to greenfield growth is absolutely going to cause already high-density areas to increase in price. As Auckland does not have plans to become a skyscraper city, the expansion can only go outwards, and it should as this is the quality of life that people who visit or reside in Auckland want for experience. New Zealand is known for its natural environment which attracts people around the world. People from other countries come here to enjoy a low-density high-quality life, and along with them come the money to support business opportunities. If all of Auckland's growth is focussed on brownfields, it will ruin the character of Auckland city.

    For many Aucklanders, living in a suburb is where they and their family can enjoy space and nature, and commuting to work in an urban centre is already part of the "kiwi culture". The FDS plans to overdevelop the brownfield zones which would only destroy this culture. If Auckland becomes no different from other overpopulated cities with a high cost of living, unaffordable property prices, and tiny living spaces, this will not attract anyone. No people, no business, no future.

Name [redacted]

Address

Signed

Dated 19-7-23

Future Development Plan 2023 #8107

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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?

Disagree

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?

Disagree

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?

Disagree

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?

Disagree

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 Plan 2023 #8108

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Your feedback

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

Agree

Tell us why

Please also see attached submission

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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

Please also see attached submission

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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 also see attached submission

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

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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?

Agree

Tell us why

Please also see attached submission

Other feedback

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

Submission to Auckland Council on the Draft Future Development Strategy 2023 ("FDS")

As an owner of Future Urban Zone ("Future Urban") land in Auckland, I make the following submission in response to an invitation to comment on the Auckland Council Draft Future Development Strategy 2023 ("FDS").

I **strongly oppose** the Council's approach to the FDS for the following reasons:

1. Removing the future urban zones and concentrating developments on brownfields will completely break the already tipping balance and is highly likely to create significant adverse societal impacts. To have developments focussed on brownfields will also turn Auckland streets into a huge construction site for many years to come – streets that are already densely populated. This would result in a terrible environment for the residents and also increases hazards due to these construction works for Aucklanders.

   The existing Unitary Plan has already considered the varying characteristics of each suburb and has the building density set to a maximum level, where housing supply and environmental impact is balanced. Current high-density areas are already experiencing significant/unresolved issues; little space between neighbours, single garage or no parking causing roadside parking to increase which causes traffic jams, no safe space for kids to play on the property, dangerous road conditions for pedestrians and drivers alike. All these issues are only becoming worse with the amount of tall, high-density terrace/town houses being permitted for construction in these areas.

2. Existing public service facilities in current urban areas, including but not limited to public medical centres, libraries, swimming and fitness centres, public green places, will bear pressure beyond the scope of the proposed FDS regulations, and the possibility of expansion under existing urban conditions (land size, traffic conditions etc) is extremely low. This will cause a lot of inconvenience for existing users and even a shutdown for an extended period of time.

   From the cost and convenience point of view, the construction and development of new public facilities in new urban areas will allow for even distribution of the pressure on existing urban areas. It is a more cost-effective and more feasible way to use taxpayers' money as these newly developed areas will be better constructed and more aesthetically designed to provide quality-of-life improvements for Aucklanders including better irrigation systems, public infrastructures, and public facilities.

3. From an investor's perspective, funds put towards areas with a future are much more attractive. With businesses and investment, the government will also receive more tax funding, this can further be put into support of better infrastructure such as new underground power lines instead of the dangerous overhanging power pylons. This deferral or restriction to the current Future Urban development will not only cost investors time and money, but will also cost the council money as well as confidence from the investors.

4. The Council has already put time and money into effectively investigating and planning so that the Unitary Plan can be put into effect, this includes consideration for the population growth in the area, schools, town centres, kindergartens, retirement villages, road planning, public transport, drainage as well as accommodation development. We should be able assume that council's decision to zone the area as Future Urban Zone years ago was after thorough consideration.

   As the population of Auckland continues to grow, there will inevitably be a shortage of affordable housing. Promoting the development of Future Urban areas by creating new centres of living not only provide job opportunities, but also affordable living for those in the locale. Whereas if this is reconsidered now, it would be a waste of taxpayers' money to do another review when the current Auckland area becomes heavily overpopulated and these areas become sorely needed again. There is no reason for the Council to waste money and time to change the original plan with only just 6 years from effect. Money and resources should be focussed on upgrading existing infrastructure which Auckland Council has always promised but failed to carry out.

5. Local schools are also have full capacity and will not fulfil the schooling requirements of future residents should population density increase in these areas. Schools are already facing classroom space shortage, shortage of teachers, and families within the school zones need to be put on waiting lists for enrolments which evidences that the population density has reached a limit under current infrastructure capacity. Existing school resources have been unable to cope with the increase in the school-age population brought by high density development in the existing urban areas, and the educational resources provided by the government cannot match the consequences of high density development. For example, Hobsonville Point Primary School now requires an application queue two or more years in advance, and Chapel Downs Primary in Flat Bush already has more than 50 students per class. The teachers are unable to identify individual students let alone provide effective student-teacher interaction if class size exceeds a certain number. This issue persists and is common in schools in high density urban areas. In view of the limitations of built urban areas, the possibility of expanding pre-existing schools is low and extremely challenging. The only way is to increase the construction of new schools in new urban areas to reduce the pressure on pre-existing education resources.

6. The recovery of brownfield to become usable land only has two possible resolutions, money spent on sterilising and recovery, or leaving the area to naturally recover over an extensive period of time. Infrastructure is the same, the replacement or installation of new systems into the area to support development does not change between brownfield and greenfield. Furthermore, brownfield is not currently attractive towards investors, nor would it be attractive towards home owners if they are told that the area was a contaminated, waste disposal or dump site.

   Brownfield intensification will cost the council a lot less if left to decontaminate naturally over a longer period of time. We are fairly certain that developers will not be keen towards putting funds into decontamination of a property when they can invest

into a property that does not have these issues, this is why the geo-technical report exists in the first place.

7. The Council proposes to remove four areas for urban development (down zone future urban land) because of hazard risk (in whole or in part). What are the hazards risks and have these areas been identified? Does this hazard risk have any causal effect on other areas? Investigation should be focused on areas where there is high risk of flooding. Increasing the density of housing in low-risk areas and decreasing the number of houses in flood-prone areas would make sense both ethically and economically, this is a good direction for the general population as it provides for new safe and sanitary living conditions.

   Impacts of natural hazards on future urban land do exist, especially in high-density brownfield zones. Due to the dense population, green areas have drastically reduced. Current drainage pipes are unable to process large amounts of rainwater and sewage as evident with recent floods. The damage caused by these recent events is directly related to the loss of green space due to the overdevelopment of brownfield sites. The FDS plan will only increase the pressure on existing infrastructures to withstand future natural hazards which would cause far more potential losses and heavier consequences in the future.

8. The FDS provides a trigger based approach to greenfield development. It's unclear if all infrastructure projects need to be implemented prior to a change of land zoning or is a staged approach. This is not a reasonable consideration, after the zoning has been changed, infrastructure projects should be implemented so as to support further development in those Future Urban areas where investors have put money into. A staged approach after the zoning change is reasonable as the expansion of Auckland goes outwards.

   Additionally, the FDS will form part the Reginal Policy Statement which poses a risk that all future private plan changes can be rejected if they don't align with the FDS especially around infrastructure triggers. These infrastructure rules should have already been considered during the previous Unitary Plan assessment. This should be a united decision and not one that is solely controlled by FDS, as there will be believers that emphasis on brownfield recovery at the cost of the council/government is more effective that upgrading or installing new infrastructure to greenfield, as previously mentioned developers would not be keen and neither would taxpayers.

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10. Restrictions to greenfield growth is absolutely going to cause already high-density areas to increase in price. As Auckland does not have plans to become a skyscraper city, the expansion can only go outwards, and it should as this is the quality of life that people who visit or reside in Auckland want for experience. New Zealand is known for its natural environment which attracts people around the world. People from other countries come here to enjoy a low-density high-quality life, and along with them come the money to support business opportunities. If all of Auckland's growth is focussed on brownfields, it will ruin the character of Auckland city.

    For many Aucklanders, living in a suburb is where they and their family can enjoy space and nature, and commuting to work in an urban centre is already part of the "kiwi culture". The FDS plans to overdevelop the brownfield zones which would only destroy this culture. If Auckland becomes no different from other overpopulated cities with a high cost of living, unaffordable property prices, and tiny living spaces, this will not attract anyone. No people, no business, no future.

Name [redacted]

Address

Signed [redacted]

Dated 19-7-23

Future Development Plan 2023 #8111

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Your feedback

Focusing growth

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

Disagree

Tell us why

Do you only plan things in 2 years time ? I am not sure if people can trust the city council anymore

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?

Disagree

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?

Disagree

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?

Disagree

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 Plan 2023 #8129

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Your feedback

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Tell us why

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Tell us why

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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

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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?

#8129

Level 5, AON Centre
29 Customs Street West
Auckland
New Zealand
T 0800 699 000
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31 July 2023

Consultation Draft of the Auckland Future Development Strategy
Via online submission: https://akhaveyoursay.aucklandcouncil.govt.nz/future-development-strategy

Submission on the Consultation Draft Auckland Future Development Strategy 2023 - 2053

Name of Submitter: Waka Kotahi NZ Transport Agency

Address for Service: Waka Kotahi NZ Transport Agency
Attention: [redacted]

Overview of submission by Waka Kotahi:

1. Waka Kotahi welcomes the opportunity to provide feedback through our submission on the Draft Auckland Future Development Strategy (FDS). This submission addresses key parts of the FDS which we support, together with areas Waka Kotahi considers should be clarified and some that should be strengthened.

2. Waka Kotahi seeks to continue to engage with the Council as a key stakeholder in the draft FDS. This includes working with the Council team to:
   - finalise the FDS with the incorporation of our feedback provided in this submission.
   - develop and finalise the FDS implementation plan.

3. In summary, Waka Kotahi identifies the following key points within our submission:

   - General support for the direction of the FDS which aligns with our strategic direction.

   - General support for the Strategic Spatial Framework including the principles for growth.

   - Support the update to the quality compact approach to provide a greater degree of intensification in existing urban areas, along with less reliance on expansion into future urban areas.

   - Request for a map in the FDS which clearly shows a spatial vision for Auckland, by identifying the parts of Auckland where growth and development will be encouraged including in areas where there is existing infrastructure, high accessibility and areas integrated with planned strategic infrastructure, not just where investment will be focused.

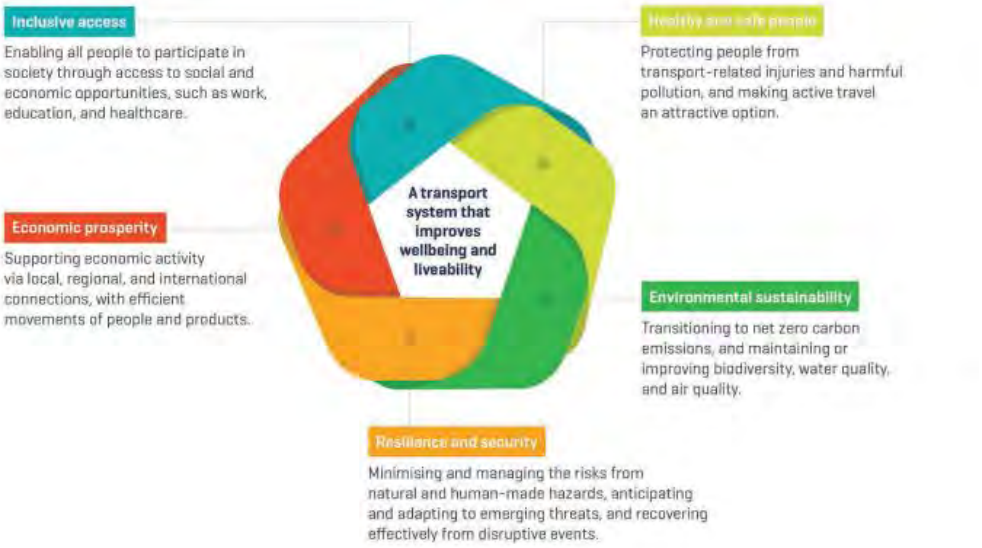
   - Support the Future Urban Land Supply Strategy being incorporated into the FDS and support changes to the future urban areas including the removal of those areas subject to major hazards and delaying a number of other areas, subject to a few points outlined in detail within the submission.

Waka Kotahi Statutory Functions, Powers and Responsibilities:

4. The Waka Kotahi statutory objective under the Land Transport Management Act 2003 (LTMA) is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest.

5. Waka Kotahi must carry out its functions in a way that delivers the transport outcomes set by the Government which are provided in the Government Policy Statement on Land Transport (GPS)[1]. This sets out four strategic priorities, which are relevant to this submission:
   - **Safety**: Developing a transport system where no one is killed or seriously injured.
   - **Better Travel Options**: Providing people with better transport options to access social and economic opportunities.
   - **Climate Change**: Developing a low carbon transport system that supports emissions reductions, while improving safety and inclusive access.
   - **Improving Freight Connections**: Improving freight connections for economic development.

6. The Ministry of Transport (MoT) have developed a Transport Outcomes Framework[2]. The purpose of the transport system is to improve people's wellbeing, and the liveability of places. It does this by contributing to five key outcomes, summarised in the diagram below.



7. All these outcomes are inter-related and need to be met as a whole to improve intergenerational wellbeing and quality of life.

8. The National Policy Statement on Urban Development (NPS-UD)[3] provides a framework which supports strategic transport outcomes through the integration of land-use planning and infrastructure provision. The NPS-UD also provides the key policy direction for the development of the Future Development Strategy.

[1] https://www.transport.govt.nz/area-of-interest/strategy-and-direction/government-policy-statement-on-land-transport-2021/
[2] https://www.transport.govt.nz/area-of-interest/strategy-and-direction/transport-outcomes-framework/
[3] https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-updated-may-2022/

9. Policy 1 of the NPS-UD is of particular relevance to the outcomes of the FDS from a transport / land use integration perspective (highlighted bold for emphasis):

> *Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*
> - *have or enable a variety of homes that:*
>   - *meet the needs, in terms of type, price, and location, of different households; and*
>   - *enable Māori to express their cultural traditions and norms; and*
> - *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
> - ***have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and***
> - *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
> - ***support reductions in greenhouse gas emissions**; and*
> - *are resilient to the likely current and future effects of climate change.*

10. The Emission Reduction Plan / Te hau mārohi ki anamata (ERP)[4] sets out a pathway to an approximate 41% reduction (on 2019 levels) in New Zealand's carbon emissions by 2035. Transport is expected to play a crucial role in meeting this target. The transport chapter of the ERP includes several nationwide sub-targets for 2035:
    - reduce vehicle kilometres travelled (VKT) by 20% (versus baseline 2035 forecast)
    - increase zero emissions vehicles to 30% of light fleet
    - reduce freight emissions by 35%
    - reduce the emissions intensity of transport fuel by 10%.

11. To deliver on Government outcomes, including those set by the GPS, Emission Reduction Plan, NPS-UD and the Transport Outcomes Framework, Waka Kotahi has developed strategies relevant to the FDS. These are Arataki – our 30 Year Plan[5], Toitū Te Taiao (sustainability action plan)[6], our urban development position statement[7] and Auckland Strategic Spatial View[8]. These documents have been shared with Auckland Council as part of our input into the development of the draft FDS. We have used these policies and strategies to inform our submission on the Auckland FDS.

12. Waka Kotahi generally supports the direction of the FDS which align with our strategies. Waka Kotahi encourages the Council to address the areas outlined below. We wish to continue to work with Auckland Council to address these matters effectively.

Strategic Spatial Framework

13. Waka Kotahi generally supports the Strategic Spatial Framework including the principles for growth and change to provide direction to the outcomes of the FDS. The points below indicate where the framework needs further work and improvement.

[4] Emission Reduction Plan: https://environment.govt.nz/publications/aotearoa-new-zealands-first-emissions-reduction-plan/
[5] Arataki – 30 Year Plan: https://www.nzta.govt.nz/planning-and-investment/planning/arataki/
[6] Toitū Te Taiao: https://www.nzta.govt.nz/about-us/about-waka-kotahi-nz-transport-agency/environmental-and-social-responsibility/toitu-te-taiao-our-sustainability-action-plan/
[7] Urban Development Position: https://www.nzta govt.nz/assets/resources/auckland-strategic-spatial-view/urban-development-position-summary-and-key-components-march-2023.pdf
[8] Auckland Strategic Spatial View: https://www.nzta govt.nz/assets/resources/auckland-strategic-spatial-view/auckland-strategic-spatial-view.pdf

14. The Strategic Spatial Framework should be explicit about how it relates to the strategic outcomes of the Auckland Plan 2050. Waka Kotahi suggests clarifying whether these are intended to be complementary or replace some of the Auckland Plan 2050 outcomes.

15. Waka Kotahi considers that climate change challenges of emission reduction, including the reduction of vehicle kilometres travelled (VKT) and resilience should be included in the overarching challenges and further integrated through the FDS.

16. The Strategic Spatial Framework does not include sufficient direction for future business/employment growth outcomes in Auckland. Waka Kotahi suggests this should be informed by an up-to-date assessment of business land demand and capacity, infrastructure needed to support commercial and industrial land uses, employment growth, mixed use development and the role and function of centres. Waka Kotahi suggests considering inclusion of these issues in both the overarching challenges and the spatial outcomes.

17. Waka Kotahi supports Principle 1 and its alignment with strategic transport outcomes to reduce emissions from the transport sector. However, suggests that there should be a stronger emphasis on growth being encouraged/enabled in and around rapid transit stops and centres, and intensification in locations that are highly accessible and sustainable.

18. Waka Kotahi supports Principle 2, with additional content. Waka Kotahi suggests further additional content that explicitly recognises the risks and significant maintenance costs in relation to infrastructure that is exposed to natural hazards, including that it can be the infrastructure that is at risk rather than the housing or businesses that the infrastructure connects to.

19. Waka Kotahi supports Principle 3, in particular, reference to multiple outcomes from investment decisions and the inclusion of the infrastructure investment hierarchy.

20. Waka Kotahi supports Principle 4. This principle aligns with Toitū Te Taiao - our sustainability strategy, in particular its goal of reducing environmental harm and the protection and enhancement of the natural and built environment.[9]

21. Waka Kotahi generally supports Principle 5, however, we do not agree with the statement that Council has "limited tools to help direct growth". We recommend this statement is removed or identify more clearly the tools available, including investment and financial tools, available to direct growth in locations that will achieve multiple outcomes. We generally support Principle 5b, but we consider that there are other areas that should be prioritised for growth and investment, such as around rapid transit stops.

Part 3 Inputs to the spatial response

22. Waka Kotahi supports the approach to identifying natural and physical constraints. However, a clear strategic statement regarding "special character" should be included which contrasts the value of retaining these areas with the wide-ranging benefits of enabling development in these very accessible areas. The benefits of growth and

[9] Toitū Te Taiao Workstream 3: Protect and enhance the natural and built environment: https://www.nzta.govt.nz/assets/resources/toitu-te-taiao-our-sustainability-action-plan/sustainability-action-plan-april-2020.pdf

intensification in these areas is identified in a number of the FDS's outcomes and principles, yet there is no consideration of this within the FDS or its background evidence.

23. Clause 3.14(1)(a) of the NPS-UD requires every FDS to be informed by the most recent applicable HBA (housing and business development capacity assessment). Whilst we understand this work is underway, the FDS would benefit from an up to date HBA being made available which includes a complete assessment of housing and business land. Without this full up to date assessment of the feasible and reasonably expected to be realised capacity for housing is unclear, particularly how this relates to anticipate growth across Auckland.

Part 4 Our Spatial Response

24. Waka Kotahi supports the update to the quality compact approach in the Auckland Plan 2050 to provide a greater degree of intensification in existing urban areas, along with less reliance on expansion into future urban areas.

25. However, Part 4 of the FDS needs a map which shows the overall strategy more clearly and identifies how, where and when growth should be focused within the existing urban area alongside the future urban and rural areas. This should include both housing and business opportunities.

26. Clause 3.13(2) of the NPS-UD states that:

> *Every FDS must spatially identify:*
> *(a) the broad locations in which development capacity will be provided over the long term, in* ***both existing and future urban areas****, to meet the requirements of clauses 3.2 and 3.3; and*
> *(b) the* ***development infrastructure and additional infrastructure required to support*** *or service that development capacity, along with the general location of the corridors and other sites required to provide it; and*
> *(c) any constraints on development*

27. Waka Kotahi considers that the FDS needs to fully reflect clause 3.13(2) of the NPS-UD. Waka Kotahi is of the view that there is insufficient information in relation to clause (a) and (b). We request that land use and transport is clearly framed, and in particular, integrated by preparing a spatial planning map(s) and supporting information that addresses the following points:

- Identify key strategic transport networks (including road and rail freight) and the Auckland current and future rapid transit network. The Auckland rapid transit network is fundamental given this is where significant investment has been made or is planned to improve public transport levels of service. Waka Kotahi suggests that the FDS would benefit from identifying the opportunities for transformation associated with rapid transit and strategic networks.

- Identify highly accessible areas (i.e., inner isthmus). These are likely to be areas where there has been significant investment in infrastructure and there are likely to be further opportunities to optimise the outcomes delivered from this existing infrastructure.

- PC78 locations should be represented, especially where they align with Rapid Transit infrastructure investment and in areas with the highest levels of public transport accessibility (i.e., New Lynn, Greenlane, Mt Albert).

- Identify freight hubs, key employment areas, significant natural and open spaces and key community service destinations (e.g., hospitals and universities).

- Show the centres hierarchy, including consideration of how it links with the multi-nodal approach. This includes differentiating between nodes within the existing urban area, future urban areas and rural areas (i.e., recognising Pukekohe and Warkworth as rural nodes which may have a different approach to growth and more consideration to additional urban nodes such as Takapuna and Sylvia Park).

28. Waka Kotahi supports prioritising locations that give the greatest benefits for the region and address the Strategic Spatial Framework. However, it is not clear what Figure 18 (Spatial priority areas) is intended to show. Figure 18 includes potential major development locations, project corridors, alongside priorities for investment but this could be misinterpreted to show broader urban form outcomes.

29. Waka Kotahi recommends that Figure 18 Spatial Priority Areas is further refined through the Auckland Housing and Urban Growth Joint Programme to address the following points:

    - Spatial priorities for investment and planning are differentiated.

    - Consideration of additional priority areas for investment (i.e., locations which are expected to have greater development potential and are well serviced by the existing rapid transit network such as New Lynn, Ellerslie, Greenlane and Mt Albert).

    - Clarify the investment approach for the City Centre over the 30-year timeframe, acknowledging the range of major projects currently being planned.

    - Clarify the spatial extent of Drury and Westgate as priority areas for investment, given the level of investment to date and the work undertaken through the joint work programme.

30. Waka Kotahi would welcome the opportunity to work with Auckland Council to assist in the development of the spatial planning maps and prioritising areas for planning and investment to ensure greater integration and alignment.

Future Urban areas

31. Waka Kotahi supports the information in the Future Urban Land Supply Strategy being reframed and included in the FDS. Given the long lead time required to plan and deliver strategic infrastructure, funding and financing considerations, and alignment with emission reduction/VKT reduction opportunities Waka Kotahi supports delaying urbanisation in some future development areas.

32. Equally, Waka Kotahi is broadly supportive of timing of urbanisation being aligned with infrastructure provision. Waka Kotahi supports the timeframes for sequencing in the draft FDS identified as indicative. We also support the use of the tables with infrastructure

projects as a means to illustrate integrated and sequenced phasing. Waka Kotahi also supports clarification, that the list may be subject to change as further strategic planning and/or infrastructure funding and financing is developed. Waka Kotahi makes the following comments in relation to triggers and some of the future urban areas below.

Drury

33. Significant transport investment has been made to service Drury (e.g., rail electrification and new stations, widening of the Southern Motorway, etc.), and we query why significant other parts of Drury have been postponed to 2035+. Given the investment and pattern of live zoning in Drury to date, Waka Kotahi suggests to optimise and realise the outcomes from this investment, that all of Drury West stage 1 and 2 and Drury East should be identified for 2025+ unless there are infrastructure constraints which affects this land.

34. Please clarify the timing for the Hingaia Rising Main and or any other infrastructure constraints. Appendix 3- Water Supply Projects, identifies the timing for the “Hingaia watermain enhancement- Southern" for 2023+. If these constraints are required to enable the development of this land and this is the only reason for their delayed timing, then Waka Kotahi suggests that this is made explicit in the document.

Whenuapai and Redhills

35. The intentions for Whenuapai and Redhills are unclear, Waka Kotahi suggests clarifying the approach. Figure 18 Spatial Priorities indicates some investment is planned for the first decade and Appendix 8 (Table 3) indicates development readiness 2035+. Waka Kotahi is supportive of the phasing indicated in Appendix 8 Table 3, which will enable urbanisation to be timed with the implementation of rapid transit.

Areas for removal

36. Waka Kotahi supports the identification of the future urban areas proposed for removal, where supported by evidence.

Areas for investigation

37. Waka Kotahi supports land-use decisions that reduce trip lengths and focus growth in areas with better travel choice. We understand the rationale for investigating these areas given the Emission Reduction plan (VKT targets), recent climate related events and funding constraints in Auckland.

38. To facilitate transport planning currently in progress, Waka Kotahi would like to highlight the importance of decisions in relation to these areas being a priority. The uncertainty provides challenges for planning and protecting transport corridors in some of the future urban areas.

Information on Major Projects in Appendix 9

39. Waka Kotahi support reference in the FDS to major projects. Waka Kotahi suggests that this section could be improved and updated as and when decisions are made on these projects. We suggest that Council liaise with the relevant major project teams to ensure the FDS content is up to date and incorporates any decisions made between now and when the FDS is finalised.

Inter-regional considerations

40. Waka Kotahi suggests that the FDS should be strengthened with more detailed analysis of inter-regional issues in relation to growth and infrastructure. The spatial relationships between cities and their services and activities are of particular importance for the planning of strategic transport networks. In particular, the FDS should include recognition of the following:

    - Identification and understanding of issues and opportunities in relation to cross-boundary growth and infrastructure to the north with Te Tai Tokerau and to the south with Waikato.

    - Recognition of spatial planning initiatives undertaken in neighbouring regions, particularly those under the Urban Growth Agenda. This should include Future Proof and the Hamilton-Auckland Corridor Plan.

    - Specifically for the transport system, acknowledge the opportunities to enable stronger multi-modal connections between Auckland and Tai Tokerau and Waikato.

    - A potential implementation action could be for further cross-boundary spatial planning.

Implementation Actions

41. Waka Kotahi agrees that the FDS needs to be supported by strong policy and implementation frameworks, and in particular the FDS implementation plan that is required under clause 3.18 of the NPS-UD. Waka Kotahi seeks to continue to work with Auckland Council on the development of the implementation plan.

42. Waka Kotahi is generally supportive of the three categories of implementation identified in Part 5 and Appendix 12:
    - Changes to the Auckland Unitary Plan
    - Investment Prioritisation
    - Advocacy, research and non-statutory approaches

43. A key finding of the Waka Kotahi Auckland Strategic Spatial View is the increased uncertainty on where and when growth will occur. Waka Kotahi suggests that the FDS would benefit if greater clarity was provided on how this uncertainty will be addressed, for example:
    - Ways to encourage growth in some areas.
    - Ways to discourage growth from other areas.
    - Responses to growth in market attractive areas.

44. As part of implementation plan, Waka Kotahi supports Council undertaking the following:

    - Structure and catchment planning outlined in the implementation actions, particularly to support VKT and transport emission reduction outcomes aligned with the ERP. We support more detailed spatial planning for key nodes to identify built form, land use and employment outcomes as well as the planning, and investment required to support growth. Waka Kotahi would support the development of a programme or prioritisation framework for future planning initiatives.

- Changes to the Regional Policy Statement following adoption of the Future Development Strategy to strengthen the RMA policy framework to enable and manage growth.

- Improved analysis and explanation of financial policies and exploring new financial tools and approaches to fund infrastructure needed to implement the FDS.

- Providing greater clarity and specificity on the 'Advocacy, research and non-statutory approaches' and how they will assist in the implementation of the FDS.

Waka Kotahi wishes to be heard in support of this submission.

Signature of person authorised to sign on behalf of Submitter:

[redacted]

Future Development Plan 2023 #8130

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.

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?

Other

Tell us why
Please see attached.

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.

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.

Other feedback

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

Please see attached.

#8130

UNDER the Resource Management Act 1991

AND

IN THE MATTER of a submission by **FLETCHER DEVELOPMENT LIMITED** to **AUCKLAND COUNCIL** on the draft Auckland Future Development Strategy

SUBMISSION BY FLETCHER DEVELOPMENT LIMITED ON THE DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY

1. INTRODUCTION

1.1 This submission is made on behalf of Fletcher Development Ltd ("FDL") on the Auckland draft Future Development Strategy ("Draft FDS").

1.2 FDL is the industrial development arm of Fletcher Building. FDL is a major provider of industrial development land and the development of industrial premises. Specifically, FDL acquires and develops industrial land to support Fletcher Building's broad property requirements and also develops land for sale to third parties.

1.3 FDL delivers significant capital investment projects within key growth areas across the Auckland region. Among FDL's landholdings is a large land parcel at Silverdale West, which is addressed in detail in this submission to demonstrate the impact of the Draft FDS. FDL is working collaboratively with Fulton Hogan Land Development Limited ("FHLD") on a plan change to rezone over 100 hectares from Future Urban zone ("FUZ") to Light Industrial zoned, in accordance with the Silverdale West Structure Plan adopted by Auckland Council ("Council" or "AC") in April 2020.

Overview and scope of the submission

1.1 FDL strongly opposes the Draft FDS, which will have a very significant impact on FDL's ability to deliver development ready land to meet the needs of not just Fletcher Building businesses but also other small and large business land users across Auckland. FDL is deeply concerned that the Draft FDS appears to have been prepared with only superficial consideration of existing business land availability, the broad range of industrial activities/requirements that cannot be met with infill development only, and the benefits of aligning business and residential community development.

1.2 Providing sufficient development ready land which caters to the users of business land's broad range of requirements is essential to enable businesses to meet the service, production, and distribution needs of the Auckland community, which in turn stimulates economic development and generates employment opportunities in Auckland.

1.3 The effective moratorium on the release of business land in the FUZ for the next 10 years is likely to severely constrain economic opportunity and will also escalate land prices, compounding the effects on the economy.

1.4 The Draft FDS will also have the unintended consequence of increasing the need for private vehicle travel by constraining industrial and commercial development in areas that are already experiencing growth in residential development, meaning more people will have to travel longer distances to work by private vehicle. This is the antithesis of what the Draft FDS is intended to achieve.

1.5 This submission addresses key issues identified in the Draft FDS in relation to business land capacity. The matters identified in this submission should not be treated as exhaustive as the problems with the Draft FDS are extensive and could not all be captured in the limited time available.

1.6 This submission addresses the following:

(a) The failure to comply with the requirements of the National Policy Statement on Urban Development 2020 ("NPS-UD") (Section 3);

(b) The approach in the Draft FDS to consideration of the spatial growth scenarios and intensification options (Section 4);

(c) The likely effects of the Draft FDS on business land affordability and choice (Section 5);

(d) Issues arising in respect of infrastructure provision (Section 6);

(e) The particular concerns arising in respect of Silverdale West (Section 7);

(f) The proposed implementation measures (Section 8);

(g) The consultation process (Section 9); and

(h) FDL's conclusion and requests to the Council regarding the Draft FDS (Section 10).

1.7 A summary of this submission is contained in Section 2.

Separate submission by Fletcher Residential Limited

1.8 A separate submission has been lodged by Fletcher Residential Limited ("FRL") in relation to the likely effects of the Draft FDS on residential capacity and demand. These two submissions have been prepared together and raise some of the same issues. In order to ensure that they can each be read as standalone documents, there is some duplication across the two submissions.

Supporting technical reports

1.9 FDL's expert team has undertaken a detailed technical analysis of the Draft FDS. This submission has been informed by the following technical reports, which are appended to this submission:

(a) *Analysis of the Auckland Council Draft Future Development Strategy 2023: Impact on the Provision of Land for Business Report to Fletcher Building* Tattico Limited **(Attachment A)**;

(b) *Economic Review of Auckland Council's Draft Future Development Strategy (FDS)* Insight Economics **(Attachment B)**; and

(c) *Transport Feedback on the Draft Future Development Strategy* Flow Transportation Specialists **(Attachment C)**.

2. SUMMARY

2.1 The Draft FDS is fundamentally flawed. It fails to give effect to the requirements of the NPS-UD and, if implemented, will starve the market of much needed boosts in the supply of business land to rectify existing shortfalls and keep pace with projected growth in demand. It will push up land prices and thereby undermine affordability for businesses looking to establish, expand, or relocate within the region, likely causing some businesses to be displaced to other regions.

Failure to comply with NPS-UD requirements

2.2 The Draft FDS does not meet the requirements of the NPS-UD. Specifically:

(a) It ignores the economic focus of the NPS-UD and rather than supporting the effective functioning of land and development markets, is instead focussed on preventing further growth.

(b) There are significant capacity shortfalls for business land in Auckland, evidenced by historically low vacancy rates prevailing in many of the region's business property markets. The Draft FDS needs to rectify this, not exacerbate it.

(c) Infrastructure funding constraints have been used as a rationale to place a moratorium on growth, despite the availability of many alternative funding mechanisms. The Draft FDS contains no discussion of alternative solutions at all.

(d) No Business Capacity Assessment has been completed, which means that the Draft FDS has been prepared without all of the necessary information.

(e) Even absent of a Business Capacity Assessment, the Draft FDS acknowledges that the growth strategy does not comply with the requirement in Clause 3.3 of the NPS-UD to provide "at least" sufficient development capacity for business land over the short and medium term.

(f) In addition, there is no consideration of whether development capacity is "suitable to meet the demands of different business sectors." The growth models relied upon assume that there will be infill opportunities and Gross Floor Area ("GFA") available above ground floor level, i.e. multi levelled industrial buildings. This is not consistent with realistic land requirements and business trends in Auckland.

(g) The Draft FDS is also silent on the competitiveness margin over and above the expected demand for business land. It is therefore unclear whether a competitiveness margin has been included.

(h) The Draft FDS assumes that servicing greenfield development is more expensive than brownfield development, when in fact, having regard to the many constraints faced when retrofitting infrastructure in an existing urban area, this is often not the case.

(i) No consultation has been undertaken with the development community, which would have provided the Council with information critical to making informed decisions on these issues.

2.3 Overall, the Draft FDS's approach to business land is reckless. It will starve the market of much needed boosts in supply to rectify existing shortfalls and keep pace with projected growth in demand, and will also push up land prices and thereby undermine affordability for businesses looking to establish, expand, or relocate within the region.

Flaws in options analysis

2.4 The options analysis undertaken to assess the different growth scenarios is poorly conceptualised and replete with errors, such that its conclusions cannot be relied upon to support the chosen growth strategy.

Implementation measures

2.5 The proposed implementation measures, including making changes to the Regional Policy Statement ("RPS") seek to relitigate matters that were comprehensively addressed by the Independent Hearings Panel ("IHP") on the Auckland Unitary Plan ("AUP"). The approach proposed in the Draft FDS was resoundingly rejected by the IHP, which found that it would likely have major consequences for land prices and housing affordability.

FDL's request

2.6 Having regard to the above, FDL requests that the Council pauses the current programme on the Draft FDS and initiates meaningful consultation with the community, including the residential development sector, as required by Clause 3.13 of the NPS-UD.

2.7 In respect of Silverdale West, FDL requests that:

(a) That the Draft FDS process be paused and meaningful engagement held with FDL and its development partner, FHLD, in relation to Silverdale West;

(b) That the Council receive and process its pending private plan change application for Silverdale West based on current operative policies without deferment or delay and without giving consideration to future, and unadopted, provisions of the Draft FDS; and

(c) As a bare minimum, any new iteration of the Draft FDS, or amendment to the Draft FDS, should:

(i) Identify Silverdale West as a committed growth area; and

(ii) Show Stage 1 of Silverdale West as development ready in the 2023-2030 time period.

3. FAILURE TO COMPLY WITH NPS-UD REQUIREMENTS

3.1 The Council has a legal obligation to prepare a future development strategy which meets the requirements of the NPS-UD.

3.2 The Draft FDS does not meet the requirements of the NPS-UD, for the following reasons:

Failure to support competitive land and development markets

3.3 At a fundamental level, the Draft FDS runs directly counter to the imperative in the NPS-UD to support competitive land and development markets, representing an effort to curtail greenfield urban growth in Auckland.

3.4 The Council's assertion that the requirement to deliver "well-functioning urban environments" has shifted the focus of the NPS-UD from an economically focussed policy (per the National Policy Statement on Urban Development Capacity ("NPS-UDC")) to

one that incorporates a range of non-economic factors which may override the economic imperative is incorrect.[1]

3.5 The strong economic focus reflected in the NPS-UDC has not been superseded. There remains a strong directive in the NPS-UD for local authorities to deliver greater land supply and support housing affordability. In this regard, the Environment Court has described the purpose of the NPS-UD as follows:[2]

> *"The NPS-UD has the broad objective of ensuring that New Zealand's towns and cities are well-functioning urban environments that meet the changing needs of New Zealand's diverse communities. Its emphasis is to direct local authorities to enable greater land supply and ensure that planning is responsive to changes in demand, while seeking to ensure that new development capacity enabled by councils is of a form and in locations that meet the diverse needs of communities and encourage well-functioning, liveable urban environments. It also requires councils to remove overly restrictive rules that affect urban development outcomes in New Zealand cities."*
>
> *[emphasis added]*

3.6 The Draft FDS enables less, rather than greater land supply. It also seeks to make planning less responsive to changes in demand, by proposing changes to the planning documents to implement more restrictive rules, controlling urban development outcomes. This is not what the NPS-UD requires and, as discussed below, is likely to have a chilling effect on Auckland's economy and housing affordability.

Business Capacity Assessment not available

3.7 The NPS-UD provides for the preparation of a Housing and Business Capacity Assessment, which is the key tool to be used to understand and quantify supply and demand for housing and business land in the region. Under Clause 3.2 the Housing and Business Capacity Assessment is required to identify demand from each business sector for additional business land in the region.

3.8 Clause 3.14(a) of the NPS-UD requires that the Draft FDS must be informed by the most recent applicable Housing and Business Capacity Assessment. However, no Business Capacity Assessment has been completed and the Draft FDS relies upon unpublished data which has not been peer reviewed or made available for public review.

3.9 The current status of the Business Capacity Assessment means that the Draft FDS has been prepared without all of the information available to make informed decisions about matters critical to Auckland's future growth. The Draft FDS is therefore significantly premature and submitters can have no confidence that its conclusions are correct.

Failure to provide sufficient development capacity to meet demand for business land

3.10 Clause 3.3 of the NPS-UD requires that every tier 1 local authority must provide at least sufficient development capacity to meet the expected demand for business land:

(a) From different business sectors; and

(b) In the short term, medium term, and long term.

1 *Future Development Strategy – Overall Evidence Report for Consultation* (Auckland Council, June 2023) at 101.

2 *Middle Hill Limited v Auckland Council* [2022] NZEnvC 162 at [33].

3.11 In order to be sufficient to meet expected demand for business land, the development capacity provided must be:

(a) Plan-enabled; and

(b) Infrastructure-ready; and

(c) suitable to meet the demands of different business sectors; and must

(d) Meet the expected demand plus the appropriate competitiveness margin of 20% for the short and medium term and 15% for the long term.

3.12 While the Business Capacity Assessment is not available to enable submitters to understand whether these requirements have been met, the Draft FDS states that the draft Business Capacity Assessment indicates that:[3]

> *"…there is likely to be at least sufficient plan-enabled business capacity on an aggregate region-wide basis. Shortfalls in some sub-regions, or for specific business sectors, particularly for land extensive sectors could occur in the short to medium-term. Over the medium to long-term these are planned to be addressed by the provision of additional business-zoned land, including through the provision of centres in new development areas."*

3.13 It appears, therefore, that the Draft FDS does not comply with the requirements of Clause 3.3 of the NPS-UD to provide "at least" sufficient development capacity over the short and medium term.

3.14 In addition, the focus on delivering sufficient "plan enabled" business capacity does not meet the requirements of Clause 3.3 to deliver sufficient capacity which is "suitable to meet the demands of different business sectors."

3.15 While there may be theoretical potential in the redevelopment of existing employment areas, the reality is that this is seldom financially viable - particularly compared to residential - so it will not occur.

3.16 The growth models that have been used by the Council to support the Draft FDS assume that there will be infill opportunities and GFA available above ground floor level, i.e. multi levelled industrial buildings. While FDL supports these concepts in principle, the reality is that they will only deliver limited opportunities. In this regard:

(a) Infilling of industrial areas only works where the land size shape and contour are fit for purpose. This is often a significant constraint to infill industrial premises.

(b) Secondly, building height can only be of limited use to achieve efficiencies. Vertical multi floored industrial facilities are not proven in New Zealand and are simply uneconomic and not practical.

3.17 It appears therefore, that the analysis underpinning the Draft FDS has not been prepared based on realistic land requirements, proven technologies and business trends in Auckland, as required by the NPS-UD.

3.18 The Draft FDS is also silent on the competitiveness margin over and above the expected demand for business land. It is therefore unclear whether a competitiveness margin has been included.

3 *Future Development Strategy – Overall Evidence Report for Consultation* (Auckland Council, June 2023) at 31.

Failure to engage with development sector

3.19 Clause 3.15 of the NPS-UD requires that the Council engage with the development sector in the preparation of the Draft FDS to:

> *"identify significant future development opportunities and infrastructure requirements."*

3.20 This reflects an intention that local authorities and land developers should work constructively together to deliver urban growth.

3.21 FDL understands that the only members of "the development sector" that the Council has engaged within the preparation of the Draft FDS are the Property Council New Zealand ("PCNZ") and Kainga Ora. As a government agency undertaking largely brownfield development, Kainga Ora offers a specific perspective on urban development that is not the same as that of the private sector. Similarly, while the PCNZ purports to represent the interests of its members (and many of the national-scale development companies are not members), it has no experience in development itself.

3.22 We also understand that the Council has undertaken a survey to ascertain the development intentions of developers in Auckland. FDL did not receive an invitation to participate in this survey and indeed a survey of PCNZ's members has indicated that 93% those surveyed had not been contacted by the Council.[4]The Council has not engaged with FDL or any of the other major developers in Auckland, all of whom could have provided information critical to a full understanding of Auckland's development market and the considerations that are relevant to successful delivery of urban development. This failure to consult is immediately apparent on the face of the Draft FDS, which contains numerous assumptions and assertions which are simply incorrect and could easily have been clarified by the development sector.

3.23 Very substantial investment decisions have been made across Auckland based on the Council's decision making on urban growth to date, as provided for in the Auckland Plan, AUP and the Future Urban Land Supply Strategy ("FULSS"). In many cases, developers have advanced development proposals for their land which have now been thrown into jeopardy by the Draft FDS.

3.24 This potentially has major implications for the economic wellbeing of the development sector and all industries (civil engineers, earthworks companies, house builders, tradespeople, etc) who rely on the development sector for their business. Despite its potentially disastrous effect, the Draft FDS includes no discussion of these issues.

4. SPATIAL GROWTH SCENARIOS AND INTENSIFICATION OPTIONS

4.1 Clause 3.14 of the NPS-UD requires that the spatial strategy is informed by "*consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS."*

4.2 The *Growth Scenarios Evidence Report* ("GSER") prepared to inform the Draft FDS includes an analysis of four growth scenarios representing different spatial options for land uses (Climate, Intensive, Compact, and Expansive) to accommodate growth over the next 30 years.[5] It states that the scenarios have been tested against a "*multi-criteria analysis relying on modelling outputs as well as quantitative and qualitative information*."[6]

4 Presentation on "Auckland Future Development Strategy" (Property Council New Zealand, July 2023).
5 *Auckland Future Development Strategy - Growth Scenarios Evidence Report for Consultation* ("GSER") (Auckland Council, June 2023).
6 GSER at 4.

4.3 FDL has undertaken a comprehensive review of the spatial scenario analysis and identified numerous flaws which undermine the validity of the analysis and conclusions.

Inclusion of implausible options

4.4 The process used to derive the four options has a major bearing on the overall direction and likely findings of the analysis. Of particular concern is the inclusion of an unrealistic benchmark scenario (Scenario A) that assumes different development patterns, home and job locations, and travel habits to the other three scenarios, but which are often masked or not properly acknowledged, causing the other three scenarios to be unfairly assessed.

4.5 The GSER states that "*four growth options were developed, representing different spatial options for land use, accommodating a consistent quantum of Auckland's growth and change in dwellings and jobs over the next 30 years*."[7] Similarly, on page 5, the report records that: "*four alternative growth scenarios were developed, each representing a different urban form."*[8] These descriptions indicate that the four scenarios are equally plausible but differ (mainly) in their associated urban form. However, that is not the case.

4.6 There are fundamental differences between Scenario A and the other three scenarios. Whereas the first three scenarios were derived via workshops held with subject matter experts, Scenario A was derived during the development of the Transport Emissions Reduction Pathway ("TERP") by a smaller subject matter expert group to "*reflect a spatial distribution world where climate mitigation and adaptation interventions and land use planning were prioritised over other goals and objectives for the region*." As a result, Scenario A is based on different (and unrealistic) assumptions which make it incomparable to the other scenarios and a poor benchmark for evaluating those other scenarios. For example, the report states:[9]

> *"The evaluation found little difference between the scenarios in terms of model outputs relating to travel behaviour, except for Scenario A which…deliberately [included] significant shifts in land use patterns and transport assumptions."*

4.7 Scenario A incorporates fundamentally different, unsubstantiated transport assumptions that defy any like-for-like comparison with the other scenarios, including that:[10]

(a) People with office jobs work from home 1 day per week (which is about triple the rate assumed for the other three scenarios);

(b) Public transport fares are $2 per trip forever (regardless of trip length/mode); and

(c) The uptake of active travel modes is much greater than in the other scenarios.

4.8 Scenario A also assumes much higher levels of job and housing growth "*to enable the model to make more decisions on uptake of development capacity including providing a significantly more mixed-use environment to support more dispersed employment locations"*.[11] Consequently, Scenario A assumes much closer spatial matches between

7 GSER at 4.
8 GSER at 5.
9 GSER at 8.
10 GSER at 19.
11 GSER at 13.

the locations of new jobs and new homes than the other scenarios, which directly bolsters its modelled travel benefits.[12]

4.9 Further, Scenario A assumes that relatively high-density development will occur throughout the region, even in remote rural areas, with 80% of future dwellings in rural nodes expected to be "attached" versus only 20% currently.[13] Finally, Scenario A withdraws capacity outside areas for intensification "*as a way to influence the model to respond according with the scenario narrative*."[14] Scenario A is therefore neither plausible nor realistic, so including it is inappropriate as it sets an unfair benchmark against which other scenarios are assessed.

4.10 Similarly, Scenario D is not credible because it reflects a highly dispersed urban form that is also a major shift from the current approach. Scenario D sees only 52% of new homes inside existing urban areas, with 48% in the FUZ and rural areas. This implied future spatial direction is a wholesale departure from the agreed "70/40" split underpinning the current strategy reflected in the AUP and thus also has no real-world basis.

4.11 In summary, therefore, two of the four options have limited real-world value for determining the optimal way to accommodate growth in homes and jobs over time, which undermines the validity of the entire exercise.

Absence of status quo option

4.12 There is also no scenario representing the status quo. This is highly unusual, because the default course of action for virtually every options assessment is to simply "do nothing". Absent of such an option in the assessment, it is impossible to properly compare the potential impacts of the different scenarios to the current evidence-based trajectory.

Flaws in assessment criteria

4.13 It is apparent that no objective assessment of the scenarios has been undertaken. The criteria used to assess options should be identified independently from the options themselves to avoid potential bias, especially when scores depend on experts exercising their professional judgement. Instead, the criteria appear to have been derived from the scenarios, resulting in a circularity between the scenarios and the assessment. Because of this, the Draft FDS records that the results are "thematic",[15] therefore undermining the validity of the exercise.

4.14 The assessment criteria also fails to consider areas of common ground and instead focuses only on differences between the options. Specifically, page 21 of the GSER lists evaluation themes (i.e. criteria) that were initially deemed important, but were later disregarded entirely or considered only fleetingly because the evaluators decided to consider only points of difference. The report states that *"Having considered the range of criteria identified, it was then determined that only criteria that would differentiate the scenarios should be taken through into the evaluation process."* [16]

4.15 While the differences may be of greater analytical interest than commonalities, omitting criteria where the scenarios perform similarly systematically distorts the nature and extent of the differences between the options. Furthermore, several key issues are not

12 This can be seen on page 15, where the assumed locations of new jobs and homes is almost perfectly spatially aligned in Scenario A compared to the other scenarios.
13 GSER at 20.
14 GSER at 13.
15 GSER at 8.
16 GSER at 22.

covered in any meaningful detail (presumably because the evaluators considered them areas of common ground), including: [17]

(a) Development feasibility;

(b) Housing affordability; and

(c) Ensuring there is enough land for business.

4.16 Meanwhile, transport impacts and accessibility account for 11 of 29 criteria (38%), compared to only two criteria for natural hazards and climate change adaptation/mitigation (7%). This means that transport and accessibility effects receive more than five times the weight of climate change adaptation and mitigation effects in the growth options assessment (i.e 38% vs 7%).

4.17 While transport issues are important, the FDS can only have a very limited impact on the region's future emissions profile because most of the urban form is already fixed. Further, light passenger vehicles account for only a modest fraction of national CO_2 emissions. In this regard, the latest Greenhouse Gas Inventory (published in 2023) shows that cars produce only 8% of total (gross) CO_2 emissions[18] and average CO_2 emissions of cars are already falling due to rapid shifts towards electric, hybrid, and other low-emissions vehicles. By 2050, petrol cars will account for just over 10% of total Vehicle Kilometres Travelled ("VKT"), with hybrid and electric cars accounting for more than 70%.[19] Therefore:

(a) Policies aimed at curbing Green House Gas ("GHG") emissions from cars will have limited impacts on meeting national emissions targets; and

(b) Seeking to reduce CO_2 emissions via the spatial location of new jobs and homes will have very little impact overall.

4.18 Thus, while reducing vehicle emissions (particularly in the short term) is important, this is not an appropriate primary focus for the Draft FDS.

Inclusion of flawed assumptions and processes

4.19 Some of the model's inputs are out-of-date. For example, the modelling assumes the need to accommodate an extra 408,000 dwellings and 380,000 jobs over the next 30 years, compared to only about half that amount in the Draft FDS itself. By modelling much higher levels of growth than are now anticipated, the analysis overstates the travel (and GHG emissions) impacts of each option.

4.20 Other inputs of concern include the unreferenced and unsubstantiated assumptions that:

(a) A city centre cordon and road pricing are in effect from 2031 and 2041, respectively.[20]

(b) Infrastructure required for all options is technically feasible.[21]

17 GSER at 22; see the list of initial criteria themes in Box 3.

18 Ministry for the Environment "About New Zealand's Greenhouse Gas Inventory" (27 May 2021) <www.mfe.govt.nz/climate-change/state-of-our-atmosphere-and-climate/new-zealands-greenhouse-gas-inventory>.

19 **Error! Hyperlink reference not valid.**Jayne Metcalfe and Serge Peeters "Vehicle Emissions Prediction Model VEPM 6.3 update technical report" (28 April 2022) Emission Impossible Ltd and M&P Consulting Ltd <www.nzta.govt.nz/assets/Highways-Information-Portal/Technical-disciplines/Air-quality/Planning-and-assessment/Vehicle-emissions-prediction-model/VEPM-6.3-technical-report-2022.pdf>.

20 GSER at 17.

21 GSER at 18.

4.21 Infrastructure requirements for the FUZ have been closely studied, but this is not the same for the infrastructure required to support widespread intensification under Plan Change 78 ("PC 78"). As discussed in Section 6 below, there is significant uncertainty that the infrastructure upgrades needed to support the intensification enabled by PC 78 are feasible.

4.22 The reliability of the model's processes, and hence outputs, is also a concern. For example, page 12 of the GSER records that the model crashes and breaks if there is insufficient capacity, which raises concerns about its robustness and reliability. Further, page 18 of the GSER records that the model has limitations in relation to capturing behaviour change even though that is critical to realising the alleged benefits of certain scenarios. At page 24, the GSER states that:

> *"To direct 'take up' to specific locations sometimes required plan-enabled capacity to be reduced or capped to limit take up and force the model to develop in accordance with the scenario narrative."*

4.23 Interfering with the model's operation and forcing it to take actions that suit a scenario narrative directly invalidates its outputs and casts serious doubt over the objectivity of the overall modelling process itself.

Flaws in approach to scoring

Reliance on subjective assessment

4.24 The majority of criteria were primarily subjectively evaluated by subject matter experts.[22] It is therefore essential that an appropriate mix of experts is used to assess them. However, the number of experts engaged, their qualifications, experience, and areas of expertise are not recorded. The expert group is recorded as comprising only members of the (unnamed) project team plus subject matter experts from Council departments and Council Controlled Organisations ("CCOs"). This raises concerns that a sufficiently deep and broad mix of expertise has not been utilised. There has also been no expert input from any other key stakeholders, such as the development community, which reduces the credibility and reliability of the scores.

Flaws in assessment measures

4.25 In addition, the measures against which criteria were assessed contain numerous flaws. In this regard:

(a) Access to open space is measured by the number of households and people within a walkable catchment of an open space that is at least 3000m^2.[23] Not only is this size threshold arbitrary, but the criterion itself does not consider the quality of the experience, nor the likelihood of congestion occurring at existing parks in scenarios with high intensification.

(b) The extent to which population is exposed to harmful air emissions from transport focusses on the *generation* of emissions, not the population's *exposure* to them.[24] This is highly misleading given the criterion's title, and it directly obscures the likely health impacts of scenarios that rely on high levels of intensification (such as Scenario A). Instead, this criterion assigns Scenario A the highest score possible.

22 GSER at 25; Natural hazards, Carbon emissions, Housing choice, Biodiversity, Health of water bodies, Water quality, Highly productive soils, Natural and built heritage, Access to social infrastructure, Air quality, Māori and cultural landscapes, Costs of development, Infrastructure and Market feasibility.
23 GSER at 36
24 GSER at 37.

(c) Access to social infrastructure was defined to include access to hospitals via active modes or public transport.[25] Hospitals are visited only rarely, and when they are accessed, it is usually in a hurry via a car or ambulance. Accordingly, the accessibility of hospitals via public transport and active modes is a crude and very narrow way to measure each option's access to social infrastructure.

(d) Similarly, access to social infrastructure and employment in high deprivation areas is partly based on accessibility to tertiary education via active modes or public transport.[26] However, very few regional residents are enrolled in tertiary education, so this is an unduly narrow way to measure the overarching criterion. Further, many people are now regularly accessing tertiary education online.

No reflection of cardinal modelling

4.26 Another issue arising in respect of the scoring is that the cardinal nature of the modelling outputs is not reflected in the multicriteria analysis scores. For example, an option may have scored only slightly better than another on a specific criterion according to the modelling, but the scores imply that it performed two or three times better overall. This issue affects at least three of the 29 criteria, including:

(a) The extent to which scenarios impact carbon emissions;[27]

(b) Mixed use communities;[28] and

(c) Accessibility to key economic activity.[29]

Inconsistency/errors in scoring

4.27 In addition, the scoring for several criteria does not reflect the preceding discussion. This issue affects at least three of the 29 criteria, including:

(a) The degree to which urban development consumes highly productive land.[30] For this criterion, Scenario C was scored as negative two because of its FUZ land despite the preceding discussion clearly stating that FUZ land is exempt from the requirements of the National Policy Statement on Highly Productive Land;

(b) Housing choice;[31] and

(c) Access to social infrastructure.[32]

Failure to weight criteria

4.28 Finally, the evaluation does not weight the criteria. This is highly unusual, and it directly elevates the importance of some factors while systematically downplaying others. That is because, absent of weighting, the more criteria per theme, the greater the weight afforded that theme in the evaluation, and vice versa. For example, suppose that one theme is measured by ten criteria, while another theme is measured by only two criteria. If weights are not applied, the first theme carries five times as much weight in the

25 GSER at 40.
26 GSER at 41.
27 GSER at 32.
28 GSER at 40.
29 GSER at 45.
30 GSER at 35.
31 GSER at 39.
32 GSER at 42.

overall assessment than the other. Usually, this is addressed by applying weighting that mitigate differences in criteria breadth and depth, but that is not the case here.

4.29 The following table puts the issue in context by showing the share of the 29 criteria that fall into (our suggested) evaluation themes, and the implied weighting on each overall:

Evaluation Themes	Number of Criteria	Implied Weight
Travel Impacts/Accessibility	11	38%
Environment	4	14%
Land & Housing Markets	4	14%
Social/Culture/Heritage	2	7%
Economy	2	7%
Infrastructure	2	7%
Māori	2	7%
Natural hazards/Climate adaptation	2	7%
Total	**29**	**100%**

Number of Criteria and Implied Weighting by Evaluation Theme

4.30 The result is that some themes have been given excess weight at the expense of others, without explanation, distorting the overall assessment.

Summary

4.31 It is apparent from the above that the consideration of spatial growth scenarios that has informed the Draft FDS is replete with baseless assumptions, inconsistencies and errors.

4.32 It is therefore of little assistance in terms of identifying the appropriate strategy for urban growth in Auckland and cannot be relied upon to justify the strategy set out in the Draft FDS.

5. FAILURE TO PROVIDE SUFFICIENT BUSINESS LAND CAPACITY

5.1 The Draft FDS acknowledges that there will be shortfalls "*in some sub-regions, or for specific business sectors, particularly for land extensive sectors*" in the short to medium-term.

5.2 The focus in the Draft FDS on travel impacts and accessibility assumes that more intensive development of greater employment generating land uses in or adjacent to existing residential areas. In adopting this approach, the Draft FDS seems to overlook the reality that many existing urban areas are almost fully built-out, with only very limited scope for growth, particularly for the broad range of business land requirements.

5.3 Further, there are already shortfalls in business land capacity in Auckland. The Insight Economics report states:[33]

> *"We agree that there will be shortfalls in business capacity over the short- to medium-term for certain parts of Auckland and/or specific business sectors. reflected in the current, historically low vacancy rates prevailing in many of the region's business property markets.*
>
> *For example, a Colliers research report for the first quarter of 2023 noted that the region's industrial property market had reached a historically low level of vacancy, with the vacancy rate for prime industrial properties falling to only 0.5%. In some southern industrial*

33 *Economic Review of Auckland Council's Draft Future Development Strategy (FDC)* (Insight Economics, July 2023) at 24.

> *areas, such as Manukau/Wiri and East Tamaki, there were virtually no vacancies as at the time of their survey. This is a concern, because a lack of vacant premises stifles opportunity and may even cause some businesses to be displaced to other regions, such as the large new business area in Pokeno."*

5.4 It is incumbent on the Council (and required by the NPS-UD) to rectify this issue. The Draft FDS fails to do so – and instead, compounds the issue by further constraining growth pushing up land prices and thereby undermining affordability for businesses looking to establish, expand, or relocate within the region.

5.5 The Draft FDS provides for no greenfield expansion until at least 2030. Of the areas identified for growth prior to 2030, the only two locations with a good supply of industrial land are Westgate-Whenuapai, in the north west, and Drury, in the south. There is limited supply elsewhere. This is a particular problem in the north, where residential development is continuing at pace but no industrial development has been enabled to support it, as discussed in Section 7 below.

Failure to consider needs of distribution sector

5.6 A particular concern is that insufficient consideration has been given to the needs of the distribution sector. This requires large flat vacant land to accommodate its increasingly sophisticated automation and larger facilities it requires. These types of facilities are typically located in new industrial estates which have been designed to accommodate such facilities. There is a risk that turning off the supply of such development will have a major impact on the ability of the distribution sector to locate in Auckland.

Need for greater supply

5.7 It is essential that Auckland's supply of business land keeps pace with economic growth and industry standards. Land supply needs to meet the required site and location characteristics, in terms of access to transport, contour and lot size. This is a significantly higher constraint than residential land where there is far greater flexibility to accommodate and work with size, shape and contour of land.[34]

5.8 Accordingly, new business land *will* be required in the FUZ to keep pace with residential growth and to address historic and existing home/job balances in the region's greenfield areas.

5.9 It is critical that any growth strategy provides opportunities across the region, rather than only in one or two locations. The acknowledgement that there will be shortfalls in some sub-regions (i.e. the north) is a direct result of the decision to constrain the development of the FUZ.

5.10 This is likely to have a significant impact on productivity, will increase market prices and will also lead to many more people having to travel significant distances to work, likely by private vehicle.

6. INFRASTRUCTURE PROVISION

6.1 It is apparent that the key factor underpinning the Draft FDS is the significant budget constraints currently faced by the Council. The Council's response is to put a moratorium on growth until funding issues are resolved and infrastructure can be funded.

6.2 The problem with this approach is that demand for housing and business development will continue, notwithstanding the Council's financial position. The focus on

34 *Auckland Council Draft Future Development Strategy 2023 – Impact on the Provision for Business Report to Fletcher Building* (Tattico Limited, July 2023) at [3.14].

infrastructure constraints rather than what is required to enable economic and community development represents "the tail wagging the dog". Managing the pace of growth is a tool that distorts the market and undermines industrial land affordability, as proven over the last decade.

6.3 The Draft FDS is entirely silent on other funding options available to fund infrastructure. In fact, there are many other options available that could be explored to enable the coordinated release of greenfield land, including:

(a) Private sector funding of key infrastructure;

(b) The option of partnership arrangements between the private and public sectors to fund infrastructure over time;

(c) Infrastructure funding agreements and the opportunity to build in mechanisms to fund work as land owners benefit from early infrastructure investment; and

(d) Utilisation of the tools in the Infrastructure Funding and Financing Act 2020.

6.4 The Draft FDS appears to assume none of these are applicable or workable. Having regard to the potentially significant economic consequences of constraining growth in the manner proposed, equal energy should be put into identifying innovative proposals that could work on targeted growth areas.

6.5 In addition, the Draft FDS appears to reflect the position that it is necessary for all major infrastructure upgrades to be funded and/or in place before land can be rezoned. That is unnecessary and in fact represents poor planning practice. The NPS-UD requires that urban development is "integrated" with infrastructure planning and funding decisions. As the IHP on the Drury East Plan Changes observed:[35]

> *"The essence of integration is that those matters happen contemporaneously, in a complementary way, and over time….*
>
> *A sequential approach…would compromise the potential for urban zoning and development to occur in a timely and integrated fashion … That is because live zoning provides certainty and gives confidence to landowners (and central and local government agencies) that expenditure on infrastructure will be worthwhile and efficient."*

6.6 It is unnecessary, and potentially economically wasteful, to require all infrastructure required to support a large, staged development to be present at the outset. Implementing infrastructure before it is required can incur unnecessary financing costs over the period when it is unused or under-utilised. Some infrastructure, such as waste water networks, require a critical volume to operate efficiently, and so unused or under-utilised periods can lead to technical issues. It also prevents funds from being applied to other infrastructure that will be needed sooner. Once implemented, infrastructure needs to be maintained, which incurs costs. Installing infrastructure only when it is needed avoids those interim maintenance costs.

Infrastructure triggers

6.7 The analysis which has informed the infrastructure "triggers" for future land release has been undertaken at a coarse scale, and the actual infrastructure requirements required to service land will vary depending on factors including the nature of the development, infrastructure solutions proposed and the status of development on neighbouring sites.

35 *Proposed Private Plan Change 49 - to the Auckland Unitary Plan, Decision following the hearing of a Private Plan change under the Resource Management Act 1991* (Auckland Council, August 2021) at [179]-[180].

6.8 Over time, infrastructure requirements and solutions are likely to change. For example, the transport projects listed are (for the most part) those set out in the Regional Land Transport Plan ("RLTP"), which is subject to review and changes every six years. Further, Appendix 3 of the Draft FDS records that two key transport documents are currently being finalised, being the Auckland Rapid Transit Plan ("ARTP") and the Tāmaki Makaurau Integrated Transport Plan ("TMTP"). As such, projects and project timeframes are subject to change.

6.9 Although it is proposed that Council will stringently adhere to the infrastructure timeframes set out in the Draft FDS, the Draft FDS also allows timeframes to be reviewed. Using infrastructure upgrades such as Mill Road as an example, it is not reasonable to have development areas controlled by projects where funding may be redirected, be brought forward/pushed out, or removed altogether, which can be based on decisions at a government political level, and therefore out of the control of Council.

6.10 The extent of several projects is significant, such as Mill Road, the North Shore Rapid Transit (extension to Milldale), North-west Rapid Transit and SH16-SH18 Connections. The Draft FDS does not give regard to how these upgrades may be staged, or how interim interventions put in place by the transport authorities may deliver or assist in delivering suitable short to medium term network improvements. For example:

(a) A new Westgate bus station and improvements along SH16 for buses currently being implemented will improve public transport attractiveness and reliability for the North-west, such that the effect between the ultimate outcome (North-west Rapid Transit) and the interim outcome may be relatively minor (more resilient) when considering the timing of development;

(b) The recently completed Northern Corridor Improvements extends the Northern Busway to Albany and therefore assists with improving bus reliability for bus users to the North; and

(c) The provision of bus shoulder lanes in the future on SH1 to Silverdale, where limited interchange crossings exist, would present a feasible, reliable and low cost alternative that benefits bus users, with improved frequencies for local service, delivering a viable medium term solution. This approach is already being applied to SH16.

6.11 It is inappropriate to prohibit development where safe transport solutions can be addressed prior to the ultimate corridor upgrade being delivered.

6.12 The identified corridor upgrades do not only address transport (safety, active modes and capacity) but also include a significant amount of land and cost to improve stormwater improvements (for example, the Coatesville-Riverhead Highway upgrade), requiring private land acquisition. It is unreasonable for the Draft FDS to tie the development of private land to transport upgrades, as:

(a) Private land requires third party land acquisition which only the regulatory authorities can deliver.

(b) Safe, effective and efficient solutions can be delivered by private developers within the existing road reserve, which addresses the transport effects of private development.

6.13 Having regard to the above, while alignment of infrastructure and development over the long term is of course critical, it is unnecessary and inappropriate for infrastructure considerations to control development to the extent that a moratorium is placed on growth until infrastructure is available.

6.14 The appropriate time to consider whether the necessary infrastructure is available to support a greenfield development is at the plan change stage, when the proposed

development and its context is fully understood. There is an established legal position regarding the extent of infrastructure required to service a proposed development or rezoning[36] which can be thoroughly tested via the Schedule 1 process. The current framework which includes placing land use and infrastructure upgrade triggers into planning provisions allows the opportunity for developers to progress (working with the road controlling authorities) transport upgrades, which inevitably saves the roading authorities money.

Carbon emissions

6.15 In terms of carbon emissions, the Draft FDS also appears to be premised on the assumption that concentrating urban growth in the existing urban area will reduce vehicle emissions. There is no evidence to support that assumption.

6.16 To the contrary, enabling the development of well-functioning urban environments, including business development on the urban fringe, will support those areas as self sustaining neighbourhoods in which people can live, work and play, thereby reducing travel requirements.

6.17 Residential growth enabled in recent years has increased the population around Auckland's fringe. However, the development of employment land, and the provision of public transport networks, have not occurred at a similar pace, which in turn requires people to travel large distances to reach employment hubs.

6.18 The Auckland Transport Alignment Project ("ATAP") report that underpins the transport investments included in the Regional Long Term Plan (and the Draft FDS) highlights the:[37]

> *"significant unevenness to future employment accessibility and a growing polarisation of access to employment in the future. By 2046 more than a million people will be living in the western and southern parts of Auckland, nearly half the region's population. However, these areas see relatively little improvement in their access to employment over time."*

6.19 The 2018 Census commuting data shows that a large number of people commute to employment areas where light industrial activities are located, including:

(a) North Harbour Industrial Estate;

(b) Wairau Valley;

(c) Penrose/Mt Wellington/Onehunga;

(d) Henderson;

(e) East Tamaki (Highbrook); and

(f) Auckland Airport.

6.20 The mode of travel for the majority of these trips will be by private car, as frequent and reliable public transport connectivity does not exist to all areas, noting also that many

36 *Landco Mt Wellington v Auckland City Council* [2009] NZRMA 132, *Laidlaw College Inc v Auckland Council* [2011] NZEnvC 248.

37 Ministry of Transport NZ "Auckland Transport Alignment Project (ATAP) – Evaluation report" (September 2016) <www.transport.govt.nz/assets/Uploads/Report/ATAP-Evaluation-Report.pdf> at 15.

light industrial businesses include shift work which makes catching public transport less attractive due to off peak reliability and safety.

6.21 Existing commuter travel patterns are shown in the plan below:

North - Silverdale/Whangaparāoa	Northwest - Whenuapai/Hobsonville/Kumeu
	
Number of commuters to prominent light industrial employment areas – 3,800	Number of commuters to prominent light industrial employment areas – 2,300
Estimated annual private vehicle kilometers travelled (vkt) – 50 million	Estimated annual private vehicle kilometers travelled (vkt) – 20 million
Reduction in vkt if 15% work locally – 7 million vkt	Reduction in vkt if 15% work locally – 3 million vkt
Reduction in vkt if 30% work locally – 15 million vkt	Reduction in vkt if 30% work locally – 6 million vkt
Reduction in vkt if 45% work locally – 21 million vkt	Reduction in vkt if 45% work locally – 9 million vkt

Commuter travel patterns (using 2018 census data)

6.22 Providing employment opportunities closer to the new residential areas established around Auckland's fringe (Whenuapai, Silverdale and Pukekohe) is critical to achieving positive transport outcomes for the region, because it:

(a) Reduces the need to travel by private vehicle across the region to access jobs;

(b) Provides the ability to live, work and play about the same suburb, and substantially reduces VKTs;

(c) Allows more focussed public transport connections/routes to be established. Each area (Whenuapai, Silverdale and Pukekohe) has a nearby Rapid Transit Network ("RTN") station and therefore has the ability to extend or provide shorter and more frequent local bus services between residential and employment areas as they develop; and

(d) Provides safe connectivity for road freight and vehicle-based employment related trips, because each area already has established connectivity to the state highway network.

6.23 In summary, the Draft FDS ignores key accessibility challenges faced by Auckland's growth areas as set out in the ATAP Evaluation Report and does not contribute towards reducing VKTs for those residential areas already established/establishing about the outer areas of the region.

7. SILVERDALE WEST CASE STUDY

7.1 A particular concern for FDL is the implications of the Draft FDS for Silverdale West. As set out in the Tattico Report:[38]

(a) The Auckland Plan, AUP and FULSS all identified the Silverdale-Wainui area as a key growth area for Auckland.

(b) Significant upzoning for housing has been facilitated through the AUP and subsequent plan changes.

(c) The FULSS identified the need to provide additional industrial employment land in the north so as to create a reasonable proportion of job opportunities within the Silverdale-Wainui community. The FULSS identifies the land as scheduled to be development ready in the 2018-2022 time period.

(d) In late 2017, Council commenced work on the Silverdale West Structure Plan. This Structure Plan was entirely focused on industrial development.

(e) The Structure Plan provided for the staged release of industrial land.

(f) The Structure Plan was finally adopted in April 2020, almost 2.5 years after notification.

(g) In 2020, the Council resolved to initiate a plan change to live zone the area for industry. This was seen as critical in terms of economic development, the social drivers relating to employment, and transport in terms of creating more jobs in the north reducing the need for commuting south to Albany and the city centre.

(h) Major companies active in industrial land development purchased into the area and consolidated land holdings reliant on the Council's commitment.

(i) Through COVID, the Council signalled that budgetary constraints had impacted the timing of the Council plan change to undertake the necessary live zoning.

(j) Two primary landowners in Silverdale West Stage 1, FDL and FHLD, set up a collaborative approach to work with the Council to advance a private plan change. This plan change is intended to give effect to the Council's adopted Structure Plan. The private plan change does not seek to change zoning or intensity. It simply facilitates the Structure Plan as the Council would have through a public plan change, if they had the resources.

7.2 As set out in the FULSS, this land should already have been released for industrial development, to create jobs for the significant growth in housing in the Silverdale Wainui area. The Draft FDS proposes to defer this to 2030+.

38 *Auckland Council Draft Future Development Strategy 2023 – Impact on the Provision for Business Report to Fletcher Building* (Tattico Limited, July 2023) at 25.

7.3 This would place additional pressure on the northern transport corridor because residents will need to commute south for work. 47% of the Hibiscus catchment currently leaves the local economy for employment. This indicates that there is a significant industrial employment base within the localised market; but not enough industrial activity and employment opportunities locally to satisfy this demand.

7.4 The Silverdale Private Plan Change area could potentially accommodate 2,000 industrial employees, which would reduce the need to travel further distances, likely by car. Silverdale West has major advantages in terms of its location adjoining the existing industrial land within Silverdale, its proximity to the Silverdale transport interchange, and its location adjacent to the motorway interchange for freight movement.

7.5 The proposal to defer live zoning of Silverdale West is (like other areas) based upon a perception that there is insufficient infrastructure available to support the development. However, this ignores the extensive work that has been undertaken by FDL and FHLD (in consultation with the Council) regarding servicing of the site. Much of the bulk sewerage and water networks to service the Silverdale West area have already been constructed by FHLD. Further water infrastructure is being installed as part of the Highgate Bridge project currently underway.

7.6 In terms of other infrastructure required, the position is as follows:

(a) Only minor transport infrastructure upgrades are required to enable Stage 1 of the development, comprising 100 hectares of industrial land. The collaborating landowners will fund the necessary transport upgrades to ensure that the existing network can accommodate the additional traffic.

(b) The collaborating landowners will also fund the provision of water and wastewater infrastructure to the site.

(c) All flood risk and stormwater can be managed on the site so there is no impact either upstream or downstream.

7.7 The effect of this is that the collaborating landowners have proposed an alternative infrastructure funding mechanism to enable 89 hectares of industrial land to be live zoned. This would deliver significant employment opportunities, which, at typical employment ratios, would generate 2,000 jobs.

7.8 At the very minimum, the Draft FDS should signal that the Silverdale West Structure Plan is complete and Stage 1 of the development is to be rezoned ready for development. It could identify the infrastructure constraints the Council is facing and set a commitment to work with the private sector to find innovative infrastructure solutions for early release of the land.

7.9 Instead, the Draft FDS fails to acknowledge that such a solution is feasible and to the contrary, defers rezoning to 2030+, while aiming to put in place barriers to private plan changes that would prevent this kind of solution from being enabled.

8. PROPOSED IMPLEMENTATION MEASURES

8.1 The Draft FDS records an intention to implement changes to the AUP to require stricter compliance with the Council's growth strategy. Specifically, the Draft FDS proposes the initiation of a change to the RPS to:

(a) Amend the RPS to more directly require compliance with the FDS; and

(b) Make the Rural Urban Boundary ("RUB") a regional plan rule such that it cannot be amended by way of a private plan change request.

8.2 These changes appear to be motivated by a perception that private plan changes approved "out of sequence" with the FULSS have undermined the Council's ability to provide for integration of urban growth and infrastructure funding and delivery and should therefore be curtailed.

Requiring compliance with the FDS

8.3 Auckland's experience of the FULSS demonstrates that it is impossible for the Council to unilaterally control where growth occurs. Land release and development has not rolled out in accordance with the identified schedule, because it is a blunt tool that does not take into account land ownership patterns, market demand and other factors which determine how development occurs. Some flexibility is required to accommodate those factors. In this regard, the IHP on the AUP expressly decided to remove reference to a land release programme in the RPS. It said:[39]

> *"This is because the land release programme is currently not complete and therefore not available for review, there will be little public and stakeholder input as the process under which the land release programme is being prepared sits outside of the Resource Management Act 1991 and the programme represents a return to "failed growth policies of the past" and could be used as a means by the Council for constraining growth in the Future Urban Zone."*

All of those considerations continue to apply.

8.4 Since the FULSS was promulgated, the Council has only advanced one public plan change (at Whenuapai) to give effect to the land release strategy identified. This was subsequently withdrawn. The Council has therefore resoundingly failed to advance public plan changes to release land in accordance with its own policies under the AUP and FULSS. It has relied on the private sector to do this.

8.5 Private plan changes approved have almost all been within the areas identified in the FULSS as targeted for growth and zoned FUZ by the Council through the AUP. They have typically only been inconsistent with the FULSS in terms of timing.

8.6 Any private plan change must be the subject of a rigorous Schedule 1 process under the Resource Management Act 1991 ("RMA") in which the appropriateness of the proposed zoning and the ability of the land to be serviced is thoroughly tested. Decisions on private plan changes are made by experienced Independent Commissioners appointed by the Council. Therefore, all private plan changes that have been approved have been demonstrated to give effect to the relevant statutory and planning documents and to achieve the purpose of the RMA.

Making the RUB a regional rule

8.7 The Urban Growth provisions of the RPS and the question of whether the RUB should be a regional or district rule were robustly and comprehensively debated at the AUP hearings.

8.8 The IHP considered in detail the extent to which the AUP should lock in land supply and infrastructure decisions, concluding that such a step would not be consistent with the sustainable management purpose of the RMA. It said:[40]

> *"While the desire of the Council to achieve planning certainty about growth over the next 30 years is understandable, the Panel does not*

39 *Report to Auckland Council Hearing topic 013 Urban growth* (Auckland Unitary Plan Independent Hearings Panel, July 2016) at 8.

40 *Report to Auckland Council Overview of recommendations on the proposed Auckland Unitary Plan* (Auckland Unitary Plan Independent Hearings Panel, July 2016) at 67.

> *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."*
>
> *[emphasis added]*

8.9 The IHP heard extensive economic evidence that excessively strict controls in respect of urban growth would likely have the effect of driving up prices, suppressing development and severely adversely affecting housing affordability. The IHP said:[41]

> *"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."*

8.10 The proposal in the Draft FDS essentially represents another attempt to lock in the RUB, notwithstanding the incontrovertible findings of the IHP that such changes to the planning framework would have significant adverse effects on land values and would be inconsistent with the scheme of the RMA.

8.11 In the present case, no evidence has been provided to suggest that the IHP's concerns about severe adverse effects on affordability would not eventuate if the Draft FDS is approved.

9. CONSULTATION PROCESS

9.1 The Draft FDS is an extremely important document which will have major implications for Auckland's future growth and wellbeing. The consultation process adopted by the Council has not reflected that importance, and FDL is concerned that when making decisions on the Draft FDS, the Council will not be properly informed of the issues.

Timing

9.2 Section 83 of the Local Government Act 2002 ("LGA 02") requires that when using the special consultative procedure, a local authority must invite views on the proposal "for a period of not less than one month." The consultation period originally provided on the Draft FDS, of one month exactly, represented the bare minimum in terms of the legislative requirements.

41 *Report to Auckland Council Overview of recommendations on the proposed Auckland Unitary Plan* (Auckland Unitary Plan Independent Hearings Panel, July 2016) at 67.

9.3 The extension of an additional month was obviously welcomed, but even so, is insufficient to enable a comprehensive response to be provided, particularly because there has previously been no consultation between the Council and developers in the preparation of the Draft FDS, resulting in a significant divergence in terms of understanding of the issue.

No reasonable opportunity to present views

9.4 Importantly, the Council has not provided a reasonable opportunity for submitters to present their views in a manner that is appropriate to the preferences and needs of the submitter, as required by section 82(1)(d) of the LGA 02.

9.5 The Have Your Say events are wholly inadequate to provide submitters with a reasonable opportunity to present their views in accordance with section 83(1)(d) of the LGA 02, having regard to the extensive and complex issues requiring consideration. It is impossible to convey these issues by way of a public "drop in" event.

9.6 FDL took up the opportunity to present to the Planning Environment and Parks Committee on 21 July 2023. Despite the large number of major developers and other interested parties in attendance, FDL was disappointed to see that only six Councillors were present at the meeting. The meeting was an important opportunity for the Committee to understand direct from developers the key issues which have been ignored or misrepresented in the Draft FDS. It is unfortunate that so many Councillors elected not to attend.

Views to be received with an open mind

9.7 FDL has received advice that the Council may be aiming to adopt the FDS in September 2023. If correct, this timeframe leaves no scope for proper consideration of submissions and the undertaking of any necessary further analysis. It also suggests that the Council is not approaching this process with an open mind, but is instead committed to approving the Draft FDS notwithstanding the major flaws identified by submitters.

10. CONCLUSION AND REQUESTS

10.1 Having regard to the above, FDL requests that the Council pauses the current programme on the Draft FDS and initiates meaningful consultation with the community, including the residential development sector, as required by Clause 3.13 of the NPS-UD.

10.2 Future work on a revised FDS should be underpinned by the following principles:

(a) Sufficient land must be released at the appropriate time to cater for growth, continuing the combination of urban consolidation, greenfield development, and the expansion of satellite townships;

(b) Land should be released at the time needed to meet the community's needs, taking into account the long timeframes to work through the Council's regulatory processes to deliver occupiable homes;

(c) Opportunities for and staging of growth needs to be considered on an area by area basis, rather than applying blanket rules across the region;

(d) The private sector should be enabled to deliver quality urban growth;

(e) Growth needs to be serviced by adequate infrastructure, which can be supplied through a broad range of options including innovative methods and participation by the private sector (investment and development);

(f) Stormwater and flood plain management are important factors and need to be considered in the release of land, but there are various methods to manage such issues; and

(g) There should be sufficient flexibility to enable departure from the future development strategy in site specific circumstances, to be responsive to new information, site specific analysis and market need. As such, the RPS does not need to be amended to preclude private plan changes which are inconsistent with the future development strategy and the RUB does not need to be a regional rule.

10.3 In respect of Silverdale West, FDL requests that:

(a) That the Draft FDS process be paused and meaningful engagement held with FDL and its development partner, FHLD, in relation to Silverdale West;

(b) That the Council receive and process its pending private plan change application for Silverdale West based on current operative policies without deferment or delay and without giving consideration to future, and unadopted, provisions of the Draft FDS; and

(c) As a bare minimum, any new iteration of the Draft FDS, or amendment to the Draft FDS, should:

(i) Identify Silverdale West as a committed growth area; and

(ii) Show Stage 1 of Silverdale West as development ready in the 2023-2030 time period.

DATED at Auckland this 31 day of July 2023

Yours sincerely

[redacted]

[redacted]

[redacted]

[redacted]

Contact person: [redacted]

ATTACHMENT A

ANALYSIS OF THE AUCKLAND COUNCIL DRAFT FUTURE DEVELOPMENT STRATEGY 2023: IMPACT ON THE PROVISION OF LAND FOR BUSINESS REPORT TO FLETCHER BUILDING

27 JULY 2023

TATTICO LIMITED

#8130

tattico

Analysis of the Auckland Council Draft Future Development Strategy 2023

Impact on the Provision of Land for Business

Report to Fletcher Building

27 July 2023

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1 EXECUTIVE SUMMARY

1.1 This report has been prepared in support of a submission by Fletcher Development Limited (Fletcher) on the Auckland Council draft Future Development Strategy (draft FDS).

1.2 This report focuses on the impact of the draft FDS on the future supply of business land to enable Auckland to meet its economic development needs. This analysis focuses on industrial land (as opposed to retail centres).

1.3 Fletcher is a major provider of both industrial development land as well as the development of industrial premises for the many businesses within Fletcher Building that are involved in the manufacturing and distribution sector.

1.4 This planning analysis forms part of a broader assessment by Fletcher of the economic, traffic, and operational requirements for the full and successful provision of industrial land to underpin Auckland's economic growth, and how this should be reflected in a replacement FDS.

1.5 The conclusions of this analysis are that:

(a) The focus on intensification across existing urban areas in the draft FDS fails to take adequate account of the diverse needs of business land users. Such as land size (ranging from <100m^2 premises to large multi-hectare footprint buildings), proximity to employees in residential growth areas and nor does it consider the impact of the size and frequency of vehicle movements that business land use can generate. Providing sufficient development ready industrial land, that addresses the broad range of requirements, is essential to enable businesses to meet the service, production, and distribution needs of the Auckland community. In turn, stimulating economic development and generating employment opportunities.

(b) While the draft FDS acknowledges the need for business land in future urban areas "particularly in the north, north-west and south", the proposed new timing for release of business land in these areas is significantly deferred from the current Council proposed timing (in many cases in excess of 10 years). This will constrain economic opportunity in locations already experiencing growth in residential development and will compound the need for people to travel extended distances to work.

(c) Constraining land supply through reduction of business land area and deferring its release, will escalate land price, and add to land affordability problems, which will also impact affordability of residential land.

(d) The draft FDS inappropriately relies solely on urban consolidation to provide all new business land through until 2030/35. The historically low industrial vacancy rates across the existing urban areas of Auckland demonstrate there are limited new additional growth opportunities for industrial land. This is particularly acute for business activities that have real or perceived impact on adjacent land users, such as manufacturing activities typically undertaken in heavy industrial zone areas.

(e) Since the Unitary Plan became operative, Council has relied on the private sector to advance plan changes to live zone Future Urban zoned land. There have been no public plan changes completed by Council (PC5 in Whenuapai was promoted but subsequently withdrawn). All major rezonings have relied on the private sector. The draft FDS removes the ability for private plan changes and so there is a real risk that Council would not even meet the deferred proposed timing for release of land.

(f) It is accepted that Council has financial constraints, which are negatively impacting infrastructure provision. However, rather than restrict greenfield development for a decade, as the draft FDS is proposing to do in certain areas, Council should look for alternative and innovative ways to fund infrastructure. Such as working with the private sector to bring its experience and resources to help solve infrastructure problems on an area-by-area basis. This approach has been demonstrated to work across several areas of Auckland and has led to sustainable growth. Revoking the pathway for private plan changes, will not yield the desired outcomes that Council is trying to achieve and will instead hinder economic and employment growth in the region.

(g) A more effective way to solve infrastructure issues is through partnership with the development community, which calls into question why the development sector was not consulted on the draft FDS, as required by clause 3.15 of the NPS-UD. A more agile, rather than restrictive strategy, is called for.

(h) The Silverdale Wainui area was identified by the AUP and FULSS as a key growth area for Auckland. The FULSS also identified a need for additional employment land in the north (Silverdale West) to create job opportunities for nearby growing residential areas. Under current Council timing, Silverdale West was supposed to be development ready by 2018-22. However,

Council have failed to progress live zoning the land to industrial due to infrastructure constraints and have proposed in the draft FDS to defer this to 2030+. The Silverdale West area is an example where collaborating private developers (FDL and Fulton Hogan) are able fund the required infrastructure upgrades, in particular traffic, to unlock the first Stage of industrial land.

(i) The draft FDS promotes a set of "principles for growth and change" with a heavy environmental focus and disproportionately less weight given to growth capacity, particularly for business. "Future business land provision" is relegated to a secondary set of factors considered as part of the draft FDS.

(j) This understating of the importance of business development runs contrary to section 5 of the Resource Management Act 1991 (RMA) which, in association with the rest of Part 2 of the RMA, seeks the mechanisms to create the balance between cultural, environmental, social and economic outcomes essential to a sustainable community.

(k) Reinforcing this is the National Policy Statement on Urban Development (NPS-UD) which requires Council to provide a minimum of 30 years' growth for business land, and to complete a robust "Housing and Business Development Capacity Assessment" (HBA).

(l) The draft FDS has not followed a HBA as required by the NPS-UD. Had that analysis been undertaken, it would inevitably have identified the critical shortage of prime industrial land and the need to provide full provision of land to support economic growth and employment opportunities.

(m) Since 2011, the Council have been promoting a balanced growth strategy for Auckland, targeting employment/business land supply through both urban consolidation and targeted greenfield expansion. This has been consistently reinforced through the Auckland Plan, Auckland Unitary Plan, Future Urban Land Supply Strategy (FULSS) and various structure plans. The draft FDS does not present a balanced growth strategy for business land.

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

- Further constraining industrial land supply, which already show very low vacancy rates (1%) of prime industrial properties across Auckland.
- Reducing the opportunity for local employment in new residential growth areas

- Restricting manufacturing capabilities within the region, as well as the required growth within the service and distribution sectors.
- Further exacerbating congestion issues in Auckland by focusing employment in existing urban areas and not close to new residential areas.
- Significantly and negatively impacting industrial land affordability through land supply constraint, leading to more businesses relocating outside of Auckland.
- Having a demonstrable negative impact on the economic development of Auckland and the development sector.

1.6 The conclusion of this analysis is that the final FDS needs to provide a significantly increased focus on and provision for business land, and the direct economic and employment benefits this brings. To this end, this report recommends:

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

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

(c) some key principles be agreed including:

(i) sufficient business 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, including business land, 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; and

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

(d) ensure there is sufficient continuous release of business 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 Silverdale West area as a committed growth area;

(h) That Silverdale West be shown as development ready in the 2023-2030 time period.

2 FLETCHER SPECIFIC INTEREST

2.1 Fletcher Building has a dedicated industrial development team, Fletcher Development Limited (FDL). FDL acquires and develops industrial land that support Fletcher Building property requirements (supporting 20+ businesses) or is developed and sold to other purchasers. FDL delivers significant capital investment projects within key growth areas in the Auckland region where industrial development is well supported by infrastructure, market demand and employment.

2.2 The draft FDS has a significant impact on the ability of Fletcher to acquire and deliver development ready land and to construct the industrial assets essential to the Auckland economy.

2.3 This submission is related to the whole Auckland region and the identified greenfield development areas currently zoned Future Urban.

2.4 In addition, Fletcher has particular land holdings in the Silverdale West area and is heavily involved in a collaborative approach with Fulton Hogan on the development of this proposed industrial land. This submission uses Silverdale West as an example of the impact of the draft FDS. However, this is only one part, albeit an important part, of this Fletcher submission.

3 BUSINESS LAND

3.1 The draft FDS, in analysing business areas, summarises current issues and trends. This work generally accords with the understanding by Fletcher advisers. It identifies issues including:

- "*Heavy and light industrial uses are moving out towards the periphery because existing industrial land is highly constrained for expansion."* (Consultation Draft section 4.2.4)
- "*The quality compact approach to accommodating future business growth is to make the best use of existing business land, as well as create new business land in greenfield areas.*" (Consultation Draft section 4.2.4)
- "*Business land for land extensive industries has specific requirements for large, flat sites with good accessibility. A number of such sites have been identified in future urban areas and need to be protected for that purpose."* (Consultation Draft section 4.2.4)
- "*Approximately 1,400ha of business land is needed in greenfield areas … indicative business land was also identified to serve the north, north-west and southern future urban areas, the focus was on defined sites for land extensive businesses particularly in Silverdale, Whenuapai and Drury Opaheke."* (consultation draft section 4.2.4 Business Areas)

3.2 The economic analysis commissioned by FDL would suggest that the requirement for additional greenfield land is understated, and the lack of an HBA as required under the NPS-UD, has not enabled the draft FDS to appropriately address this. It is difficult to determine whether the 1,400 ha shortfall of land is an accurate figure. Regardless, there is a big disconnect between the policy approach of trying to create more additional greenfield land in these locations, and the slowing down across the board of all Future Urban zoned land.

3.3 The draft FDS and associated reports identify opportunities for more efficient use of industrial land. This is supported in principle, but will only deliver limited opportunity for modern industrial premises. Reliance on this to manage land release needs to be carefully addressed. There are two main issues.

(a) Firstly infilling of industrial areas particularly for production and distribution, only works where the land size shape and contour are fit for purpose. This is often a significant constraint to infill industrial premises.

(b) Secondly, modern distribution centres do use height of buildings to achieve efficiency; however; vertical multi floored industrial facilities are not proven in New Zealand and is simply uneconomic and not practical.

3.4 The growth models that have been used by Council to support the draft FDS assume that there will be infill opportunity and GFA available above ground floor level i.e. multi levelled industrial buildings. Setting land release must be based on realistic land requirements, and proven technologies and business trends in Auckland.

3.5 This analysis focuses on industrial business land, and the essential role tis plays in fostering economic development and employment. It does not comment on the retail, or office sector.

3.6 While a generalisation, industrial business land can be broadly characterised as economic activity targeted at:

- service;
- production (which in this report includes manufacturing) ; or
- distribution sectors.

3.7 Each of the above have different land requirements.

3.8 The service sector is typically embedded across the region in different suburbs. Firms vary from those needing small sites to medium sized properties. They provide local services to local communities.

3.9 The production sector typically requires a broader range of small through to large sites. Access to employment and good transport linkages are essential. On large sites, contour is critical.

3.10 The distribution sector is growing in importance. This invariably needs large sites of flat contour with good transport connections. Freight costs are an essential element in location considerations and are driven by the location of their market.

3.11 Much of the industrial parts of Auckland developed in the 1950s, 60s and 70s is characterised by smaller sites with a fragmented subdivision pattern. Some of these are on a moderate contour. They have traditionally focused on the servicing sector and still provide significant and useful opportunity for that function.

3.12 The production and distribution sectors require larger sites where contour is critical.

3.13 Particularly through the late 70s and to the current time, there has been a significant rollout and uptake of land for the distribution sector.

3.14 There is growing demand for suitable land for the distribution sector with increasingly sophisticated automation and larger facilities. Here, large flat vacant land is required. Major industrial estates have been created and land released. It is essential that Auckland's supply of business land keeps pace with economic growth and industry standards. Furthermore, land supply needs to meet the required site and location characteristics, in terms of access to transport, contour and lot size. This is a significantly higher constraint than residential land where there is far greater flexibility to accommodate and work with size, shape and contour of land.

3.15 The final FDS needs to enable this economic activity. For reasons set out below, the draft FDS does not meet that objective.

4 INSUFFICIENT SUPPLY OF INDUSTRIAL LAND

4.1 The draft FDS promotes a significant urban consolidation model through until at least 2030 with no greenfield expansion.

4.2 The key areas identified for growth are essentially:

- Westgate / Whenuapai;
- City centre;
- Mt Roskill
- Tamaki;
- Mangere;
- Drury.

4.3 The only structure plan that specifically targeted industry is Silverdale West. This is a critical location to support local employment and economic activity in the north A dedicated structure plan is appropriate and beneficial. However even this key business rezoning is not in the identified growth areas over the next 10 years.

4.4 The other identified growth areas through to 2030+ provide for industrial land within the general area. In this regard:

(a) **Westgate / Whenuapai**: The Whenuapai Westgate area has vacant live zoned industrial land and a significant area of FUZ zone targeted for industrial development. Parts of these are identified in the draft FDS as a priority for years 1 to 10. The rest is in priority 11-30. Fletcher supports the priority for the release of this land as an essential part of providing economic activity and local employment in the Whenuapai Westgate area. On the face of it, the spatial priority area does have an element of contradiction over the timing of release of part of the Whenuapai land in that it is shown as both a priority for investment in years 1-10 and a priority for investment in years 11-30.

(b) **City Centre:** The city centre, with new business development aligned with the CRL stations, does not provide practical sites fit for purpose land for the productive or distribution sectors. It will promote business, but it is more in the commercial, office, retail and some servicing component.

(c) **Mt Roskill:** The Mt Roskill corridor does provide limited opportunity for industrial development. The industrial areas are largely developed, with the exception of the current redevelopment of the Roma Road area. On completion, that would exhaust the large vacant industrial land in this location.

(d) **Tāmaki:** The Tāmaki industrial land is essentially developed apart from a recreational facility.

The amount of industrial land apparent in this area is somewhat distorted firstly because of the eastern highway designation and a significant portion of this being zoned Light Industry. It is also distorted by the Mixed Use zoning which is almost invariably being redeveloped for housing. Redevelopment of sites will obviously contribute to employment, but this area offers minimal industrial land suitable for new expanded productive and distribution functions.

(e) **Mangere:** The Mangere growth node does not provide for a significant expansion of industrial land.

There is, however; vacant industrial land adjacent to the airport. Furthermore, the long-term strategy identifies additional land at Puhinui but this is not envisaged until post-2035.

There is some opportunity for expansion of industrial land at the airport precinct but this is constrained by transport access. The major redevelopment of the Puhinui industrial estate is capped by tight vehicle movement constraints.

(f) **Drury:** Drury does provide vacant land for light industrial development.

4.5 The only two locations with good forward land development opportunity are Westgate Whenuapai, in the north-west, and Drury, in the south. There is some opportunity around the airport.

4.6 Development opportunity in the north is particularly constrained because the draft FDS has delayed land development in Silverdale West out beyond 2030

4.7 There are limited infill opportunities across the region, however the FDS should:

- Provide for 30 years growth as required by the NPS:UD
- Include or be informed by a HBA and at all times provide more than sufficient industrial land capacity, so as not to distort market prices;
- Create opportunities across the region, not just focused in one or two locations. In this regard, the lack of business development land in the north is clear;
- Enable high-quality sites that meet the needs of industry, both the productive and distribution sectors,

The current FDS does not set out a strategy to achieve this.

4.8 The Council has produced five structure plans since the FULSS was prepared.

- Of these, only one (Silverdale West) is solely focused on providing industrial employment land;
- The remaining four provide for some material level of industrial land release;
- The one specific industrial structure plan (Silverdale West), which Council resolutions show was to be prepared and released prior to now, is to be deferred until 2030+ under the draft FDS;
- Of the other four structure plans providing for industrial activity;
    - the Warkworth Structure Plan is proposed to be deferred from 2018/2022 to 2040+;
    - the Drury Structure Plan is proposed to be deferred from 2028 to 2035 although a large block of industrial land has been recently rezoned.;
    - the Pukekohe Structure Plan is proposed to be deferred from 2023 to 2035+ and 2040+;
    - the Whenuapai Structure Plan is targeted in part for the next 10 years and in part 11-30 years (FUZ zoned land).

4.9 In each case, the reason for deferral related to matters of infrastructure (including transport) or stormwater management. None are deferred because of an assertion of a surplus of land or changed requirements for business.

5 FDS PRINCIPLES FOR GROWTH AND CHANGE

5.1 The draft FDS sets out the key principles which have led to the strategy.

5.2 Section 2.5 "*Principles for growth and change*" identifies the "*universal ways of accommodating growth, applicable Tāmaki Makaurau-wide, no matter what scale or spatial environment is considered".* These principles are:

- *Support greenhouse gas emission reduction*
- *Adapt to impacts of climate change*
- *Make efficient and equitable infrastructure investments*
- *Protect and restore the natural environment*
- *Enable sufficient capacity for growth in the right place at the right time*

5.3 While the Council constraints on infrastructure are recognised, the key principle for growth related infrastructure should be to invest in the provision of infrastructure to meet the social and economic needs of Auckland. It is about infrastructure being an enabler of economic development and community development, rather than constraining growth due to infrastructure. There needs to be a balance. What that balance is needs to be worked through. However, the key principles of the FDS should start from the premise of infrastructure as an enabler of economic development.

Council's approach to reviewing future urban areas

5.4 The Council's approach to reviewing future urban areas is set out Appendix 7 to the draft FDS. The scope of the review covered all future urban areas that had not been live zoned as of 2023, with the intention being to evaluate the appropriateness of areas for future growth. Consideration was given to new strategic and policy direction, new and updated data, changes to enabled development capacity.

5.5 The following key criteria were used:

- Exposure to natural hazards
- Modelled contributions to increased CO_2 emissions/vehicle kilometres travelled (VKT)
- Infrastructure timing and delays

5.6 *"Other factors"* considered were:

- High-level, indicative bulk infrastructure costs
- Committed council infrastructure

- Urban form and future business land provision
- Potential to provide key locations for future managed retreat of nearby vulnerable existing urban areas
- Presence of known sites of significance to mana whenua, Māori freehold land, commercial and cultural redress, and cultural and statutory acknowledgement areas
- Loss of highly productive land
- Impacts on the natural environment, including indigenous biodiversity and water quality.

5.7 Adequacy of supply of business land is considered an "*other factor*". This does not reflect the priority the NPS:UD requires Council to give to 30 years minimum of "future business land provision"

5.8 The draft FDS defers the timing of when many future urban areas will be "development ready" and able to accommodate growth. Often this delay is due to funding issues with additional infrastructure related to growth.

5.9 There is an underlying theme in the draft FDS of constraining and slowing down business land release, and the economic development and social benefits this brings, because of infrastructure constraints. While it is accepted the FDS must be tempered by the current financial position the Council is in, for reasons set out below, if the issue is *how infrastructure is funded* so as to be an enabler of growth rather than a constraint on growth, then the FDS should be open to different and innovative ways of addressing the issue. This rather than the presumption of an unresolvable budget problem leading to a necessity to defer land release and constrain development.

6 REQUIREMENTS FOR A PLANNED SUPPLY OF LAND TO MANAGE GROWTH

6.1 The National Policy Statement on Urban Development (NPSUD) sets a legislative requirement to have a planned 30-year growth for Auckland. This is for both residential growth and business growth.

6.2 The NPSUD requires tier 1, 2 and 3 local authorities (Auckland being tier 1) to "*at all times provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term and long term.*"

6.3 The strategy is targeted at both "*existing and future urban areas*" and sets a requirement to provide growth for at least 30 years.

6.4 The business growth is required to provide "*business land from different sectors*".

6.5 In a recent Environment Court decision (*Middle Hill Limited v Auckland Council* 2022), the Court stated:

> *"The NPS-UD has the broad objective of ensuring that New Zealand's towns and cities are well functioning urban environments that meet the changing needs of New Zealand's diverse communities. Its emphasis is to direct local authorities to enable greater land supply and ensure that planning is responsive to changes in demand while seeking to ensure that new development capacity enabled by council is of a form and in locations that meet the diverse needs of communities and encourage well-functioning, liveable, urban environments. It also requires councils to remove overly restrictive rules that affect urban development outcomes in New Zealand's cities."*

6.6 The Auckland Plan, Auckland Unitary Plan and Future Urban Land Supply Strategy are set out to create a balanced strategy that will achieve this requirement.

6.7 The draft FDS significantly slows down the release of business land in the medium and long term through deferring the live zoning of Future Urban zoned land. This will only lead to a shortage of land supply which in turn will escalate land price and demand for existing industrial premises.

6.8 The Auckland Transitional Act required the development of the Auckland Plan. This in turn set a 30-year horizon to, among other things, manage growth. This promoted a combination of existing development areas plus greenfield expansion.

6.9 The first iteration of this work was the AUP which provided for a level of appropriate development, both live zoned and zoned for future urban development.

6.10 This was then complemented by the FULSS of 2017 which informed the direction and location of growth, particularly for the future urban areas identified within the AUP.

6.11 The key issue with the FULSS has been the implementation of this strategy.

6.12 The long-established development scenario set effectively in 2011 has been:

- a 'spatial plan' that provides a 30-year strategy for the development of Auckland and its communities that integrates social, economic, environmental and cultural objectives (the Auckland Plan) - completed;
- identification of a resource management strategy which among other things identified areas of future urban zoned land (the AUP) - completed;
- identification of key growth areas to be live zoned over time (the FULSS) – completed.
- development of a structure plan for key growth areas – 5 structure plans have been completed, with no other ones currently proposed;
- implementation of the necessary plan changes to give effect to these developments - only one public plan change advanced, even that was withdrawn by Council. 18 private plan changes have been advanced.

6.13 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.

(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) Council has failed to deliver a single private plan change.

(vi) This has delivered additional growth for Auckland.

(vii) To the best of Fletcher's knowledge, none of these developed private plan change areas experienced any issues with the early 2023 extreme flooding events or geotechnical problems. The design and planning system worked and what has been delivered is working.

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

6.14 With some minor changes, this could simply be adopted for the next Long Term Plan (LTP) rather than pushing through an FDS based on incomplete information. The FDS is such a critical development tool and has a huge implication on:

- land supply,
- economic development,
- industrial land and the economic viability of the development sector,

It is essential that any review of the FDS is a fully researched, worked through and tested strategy prior to adoption.

7 UNDERSTANDING THE TIMEFRAMES TO GET LAND DEVELOPMENT READY

7.1 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 employment opportunity, and business premises becoming operational and jobs created. Often this can extend out to closer to eight – ten years.

7.2 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 it 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 commissioning of business premises (manufacturing plants, service and distribution facilities) can be a further 18-months to 2-year process.

7.3 These are realistic, if slightly optimistic, timeframes. Very few projects would hit good timeframes at every stage.

7.4 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 business 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.

(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.

8 SUPPORT FOR THE CONCEPT OF A FUTURE DEVELOPMENT STRATEGY (FDS)

8.1 This analysis supports the concept of having a Future Development Strategy; but does not support the published draft approach.

8.2 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 industry in the locations that work best from an economic, social and environmental perspective.

8.3 The 2017 Future Urban Land Supply Strategy (FULSS) has worked reasonably well in informing and directing the location of growth, albeit that the strategy has not been responsive enough to keep up with the pace of growth. The timing of development ready land has invariably been slower than that set out in the FULSS. Furthermore the timing that has been achieved in all cases has relied on private plan changes.

8.4 An update of the FULSS through the FDS is a sound objective and is supported. Six years on, the FULSS does need an update. However, this needs to be a planned, considered, comprehensive upgrade; rather than a rushed reaction to a series of events.

8.5 It is accepted that there are financial infrastructure constraints facing Auckland, and therefore the direction and pace of growth needs to be clearly signalled by the Council to assist in the logical and sequential development of appropriate parts of the urban area of Auckland.

8.6 The FDS is the right thing to do; but the strategy embodied within the draft FDS is not.

9 A BETTER WAY TO SOLVE INFRASTRUCTURE

9.1 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.

9.2 The critical issue in this draft FDS is that the need for business land and housing land cannot be paused until the Council's financial position rectifies itself.

9.3 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.

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

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

9.6 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.

9.7 The Council needs to explore options including:

(i) private sector funding of key infrastructure to enable at least early stages of growth. Private funding will often benefit the wider area and provide employment opportunities sooner than Council can or are able to. (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 draft 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.

10 SILVERDALE WEST CASE STUDY

10.1 Silverdale West provides a useful case study for the impact of the draft FDS and the ability to explore alternate ways to achieve critically important economic development opportunity and employment in the north.

10.2 The context is that:

(a) The Auckland Plan, AUP and FULSS identified the Silverdale-Wainui area as a key growth area for Auckland.

(b) Significant upzoning in the area for housing has been facilitated through the AUP and subsequent plan changes.

(c) The FULSS identified the need to provide additional industrial employment land in the north so as to create a reasonable proportion of job opportunities within the Silverdale-Wainui community. The land was to be development ready in the 2018-2022 time period.

(d) In late 2017, Auckland Council commenced work on the Silverdale West Structure Plan. This Structure Plan was entirely focused on industrial development (as opposed to residential).

(e) The Structure Plan identified the staged release of industrial land.

(f) The Structure Plan was finally adopted in April 2020, almost 2.5 years after notification.

(g) In 2020, the Council resolved to move to live zone the area for industry. This was seen as critical in terms of economic development, the social drivers relating to employment, and transport in terms of creating more jobs in the north reducing the need for commuting south to Albany and the city centre.

(h) Major companies active in industrial land development purchased into the area and consolidated land holdings reliant on the Council's commitment.

(i) Through COVID, the Council signalled budgetary constraints had impacted the timing of the Council plan change to undertake the necessary live zoning.

(j) Two primary landowners in Silverdale West Stage 1, FDL and Fulton Hogan, set up a collaborative approach to work with the Council to advance a private plan change. This plan change is intended to give effect to the Council's adopted Structure Plan. The private plan change does not seek to change zoning or intensity. It simply facilitates the Structure Plan as would have the Council through a public plan change, if they had the resource.

10.3 The draft FDS has taken land which should be released before now to create jobs for the significant growth in housing in the Silverdale Wainui area, and deferred this to 2030+. This places additional pressure on the northern transport corridor as instead of more jobs in the area, residents need to commute south for work. The strategy to zone and develop a significant area of industrial land to enhance employment opportunities in the north concurrent with residential development, remains the right approach. The delay is due to funding infrastructure. Better to meet the community, social and economic objectives by finding innovative ways to fund infrastructure.

10.4 Forty seven percent of the Hibiscus catchment leave the local economy for employment, indicating there is a significant industrial employment base within the localised market; but not enough industrial activity and employment opportunities locally to satisfy this demand. The Silverdale Private Plan Change area could potentially accommodate 2,000 industrial employees which would reduce the need to travel further distances, and likely by car.

10.5 The private plan change request negotiations clearly identified the constraints the Council was working under. Consequently, the two collaborating landowners set out to find a way to work with Council and find ways to resolve infrastructure for at least the first stages of development. In this regard the Fletcher / Fulton Hogan work commitment has identified:

(i) Stage 1 of the development can be released with over 100ha of industrial land. This will require infrastructure upgrades, but it does not trigger the major Silverdale motorway interchange upgrade.

(ii) The collaborating landowners will fund the necessary transport upgrades such that the existing network will manage the generated traffic.

(iii) The collaborating landowners will fund and deliver water and wastewater services to the site.

(iv) The private plan change will be carefully designed so as to manage all flood prone areas, overland flow and stormwater within the catchment so there is no impact either upstream or downstream.

(v) Effectively the collaborating landowners are operating an alternative mechanism to fund and resolve infrastructure to get the first stage industrial land live zoned, with the private sector solving the infrastructure funding problem. The response of the draft FDS runs contrary to this approach.

10.6 The implication of the draft FDS is that:

- only the Council can fund the necessary infrastructure;
- the Council cannot afford to fund the infrastructure;
- therefore, the area should be deferred from live zoning to some future date.

10.7 Under the draft FDS, it would appear that little weight is given to the significant benefits that release of the land has in terms of reducing the need for commuting from the north and solving other infrastructure components.

10.8 The draft FDS and the supporting documents identify the need for business land in the north and the suitability of the Silverdale West area as an appropriate location for industrial land use. Silverdale West has advantages of its collocation with the existing industrial land within Silverdale, its proximity to the Silverdale transport interchange, and its location adjacent to the motorway interchange for freight movement.

10.9 Notwithstanding the identified merits of this location and the long established commitment through the Structure Plan and Council resolutions to rezone the land to light industry by now, the draft FDS defers this rezoning until 2030 plus.

10.10 The draft FDS states that the timing is changed based on the planned delivery of infrastructure. It identifies that infrastructure as being the North Shore Rapid Transit, public transport services, and interchange upgrades.

10.11 What this rationale for deferment fails to take account of are:

(a) The detailed traffic modelling as part of the Silverdale West private plan change work has identified that a significant area of industrial land can be developed in Stage 1 with identified road upgrades, before the need for the interchange is triggered.

(b) The collaborating landowners are committing to fund these works.

(c) This rezoning will deliver significant employment opportunities, which at typical employment ratios, would generate 2,000 jobs.

(d) The Council decision to relocate the rapid transit route further west, means that the Silverdale West area would be on the periphery of the walkable catchment anyway. The existing feeder bus service from the Silverdale interchange along Dairy Flat Highway provides an existing and more convenient public transport connection.

(e) Creating employment in this location reduces VKT by offering residents in this Hibiscus Coast area the opportunity to work locally, reducing the requirement for so many to have to commute south to metropolitan Auckland.

10.12 The draft FDS should instead signal that the Silverdale West Structure Plan is complete and the first Stage of land is to be rezoned ready for development. It can identify the infrastructure constraints the Council is facing and set a commitment to work with the private sector to find innovative infrastructure solutions for early release of the land. The FDS could even indicate this is a prerequisite to the Council being able to practically service this land.

11 NATURAL HAZARDS ARE ALREADY ADEQUATELY CONTROLLED

11.1 The FDS states that delaying development of some Future Urban zoned land is in part a response to the significant weather events and flooding and stormwater issues following the January and February storm events in Auckland.

11.2 There is no debate that land developed for 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.

11.3 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.

11.4 There is no urgency to advance this draft FDS for reasons of natural hazards. The existing legislative regime and AUP provisions provide all the safeguards needed.

11.5 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. It is understood those areas developed under the current AUP controls were relatively unimpacted by the storm events.

11.6 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.

12 MANAGING STORMWATER IN SILVERDALE WEST

12.1 Returning to the Silverdale West case study, the Silverdale West Structure Plan identifies a flood plain through the valley running through the land.

12.2 The collaborating landowners, through the private plan change request, have commissioned detailed flood modelling work in this area. That work has been updated following the January 2023 storm events.

12.3 Essentially the core flood prone area is proposed to be zoned Open Space. The open space zoning will make it clear it is not suitable or appropriate for development. It is accompanied by protection of wetlands and upgrading of stream margins. A public walkway network will be created through the area to add to the amenity of the industrial estate. This project will see the significant enhancement of the stream and its environs.

12.4 The key issue is, through sensible zoning provisions and appropriate engineering management as required under the existing AUP controls, all facets of flood risk and natural hazards can be successfully managed.

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)

13.1 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.

13.2 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."

13.3 The reasons why the Council's suggestion of a regional rule was 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.

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

13.4 The community has effectively relied on the private sector to implement the plan changes necessary to give effect to the FULSS and associated structure plans. 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. No public plan changes have been promoted that would give effect to the current growth strategy. Every greenfield development has relied on a private sector initiative and a private plan change.

13.5 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, a more effective and practical approach is to work collaboratively with the private sector to facilitate a blend of public and private plan changes to implement the Council's growth strategy.

14 RECOMMENDATIONS

14.1 It is suggested the Fletcher submission seek the following next steps from the Council:

(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 or collaboration with 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;

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

(d) ensure there is sufficient continuous release of business 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) that any new iteration of the FDS include the Silverdale West area as a committed growth area;

(h) that Silverdale West be shown as development ready in the 2023-2030 time 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;

(j) the FDS 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.

#8130

ATTACHMENT B

ECONOMIC REVIEW OF AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY (FDS)

27 JULY 2023

INSIGHT ECONOMICS

INSIGHT | ECONOMICS

#8130



Final Report: 27 July 2023

Economic Review of Auckland Council's Draft Future Development Strategy (FDS)

Prepared for: **Fulton Hogan Land Development & Fletcher Building**

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1. Executive Summary

Scope & Purpose of Report

This report peer reviews Auckland Council's (**AC**'s) *Draft Future Urban Development Strategy* (**FDS**) from an economics perspective, particularly the underlying assessment of options in its *Growth Scenarios Evidence Report* (**GSER**). It focuses on the rationale for, and likely effects of, proposed major reductions in Future Urban Zone (**FUZ**) land due to alleged greenhouse gas (**GHG**) impacts.

Background

The Auckland Plan 2050's development strategy is the region's current blueprint for growth, which reflects the culmination of many years' close collaboration by all stakeholders. The FDS, however, signals a wholesale departure from this. Given the tremendous time and effort taken to forge the current approach, the evidential threshold for any proposed new strategic direction – like the FDS – is necessarily high. In our view, though, the research and analysis underpinning the FDS is materially deficient and well short of that standard. This report explains our position by describing several serious issues with the multicriteria analysis (**MCA**) of growth options underpinning the FDS.

Key Findings – Scenario Definition

The first step in an MCA is to define the options for assessment. Typically, there are three or four options, one of which is the status quo, so that any proposed changes can be readily assessed. The FDS' scenario definitions, however, are unorthodox and puzzling. First, they include an unrealistic, utopian scenario – based on a totally different set of transport and infrastructure assumptions – that forms a fictional benchmark against which the other scenarios are unduly assessed. In addition, another scenario reflects a highly dispersed urban form that also makes no sense. Consequently, two of the four scenarios are implausible and become unnecessary distractions. Moreover, no scenarios represent the status quo, which dramatically reduces the overall utility of the analysis.

Key Findings – Evaluation Criteria

The criteria used to assess options are also problematic because:

- They ignore common ground and focus only on option differences. This distorts the scale of reported option differences, while omitting key criteria because they were deemed as areas of common ground. Conversely, by including all criteria in the assessment, a full picture of option similarities *and* differences could have emerged to enable better-informed decisions.

- The criteria fixate on travel impacts despite future travel mostly being "baked in" due to the current population and existing urban form. In addition, the MCA's focus on car-based travel grossly overstates its role in GHG emissions, while ignoring the current, rapid shift towards lower emissions vehicles. At the same time, the analysis of FUZ GHG emissions is flawed because it reflects only the current situation, not each FUZ area's future state, where they are designed to operate in a largely self-sustaining manner (as per their structure plans).

- Finally, the criteria overlook the likely adverse effects of intensification, while largely ignoring key criteria in the NPS-UD, such as the need to promote competition in markets, while boosting housing choice and improving affordability.

Key Findings – Option Scoring & Weighting

We also hold grave concerns about the MCA's approach to scoring/weighting because:

- It relies intrinsically on a model whose inputs, throughputs, and outputs appear unreliable. In addition, many criteria are scored primarily by an unnamed panel of Council and CCO experts, without any real input from other key stakeholders, particularly FUZ landowners.

- 10 of the 29 criteria are assessed via very narrow and specific measures that belie the broader scope of the overarching criteria and distort likely option merits and effects.

- In addition, the scores for many criteria defy the reported outputs of the model and/or differ significantly from the preceding commentary and analysis.

- The decision not to weight criteria directly elevates the importance of some factors while systematically downplaying others. This is because, absent weights, the more criteria per theme, the greater the weight afforded it, and vice versa. And, in the MCA, one theme – travel impacts and accessibility – had 10 criteria, while other themes had only two.

Key Findings – Consideration of Capacity Sufficiency

The MCA pays little attention to the sufficiency of business and residential capacity and instead relies mainly on the theoretical, plan-enabled capacity of PC78. This seems inappropriate because:

- PC78 is on hold and, if it is later withdrawn or revised substantially, there will be major implications for capacity sufficiency, but this is not acknowledged in the FDS. Moreover, plan-enabled capacity has no real-world meaning, so relying on it here is unsound.

- PC78's capacity uplifts are inversely proportional to the density already enabled by the AUP, so it significantly boosts capacity in peripheral locations while having little impact in and around centres, where higher density is already permitted by the AUP. Thus, while PC78 enables unprecedented levels of plan-enabled capacity, much of it is poorly located.

- Capacity serviceability is not properly assessed, with the MCA merely assuming that all plan-enabled capacity is technically feasible to service. That may not be the case for (say) replacing water or wastewater trunk mains in densely populated existing urban areas, where the resulting cost and disruption may render it untenable.

- Similarly, feasibility and uptake assume a continuation of the past. However, financial feasibility has changed profoundly, and many of the best intensification opportunities have already been taken up (with remaining thus ones being more marginal overall). Consequently, the assumption that the past will simply continue is not well-founded.

- Finally, the assessment pays almost no attention to business land needs and instead simply notes that at least 1,000 hectares of business land will likely be needed in the FUZ. That aside, it largely remains silent on this critical piece of the capacity puzzle.

Key Findings – Impacts on Choice & Competition

The MCA also fails to adequately consider impacts on key NPS-UD directives, such as promoting competition in markets, and ensuring greater housing choice and improved affordability. Instead, the evaluation zooms in to fixate on other factors that supposedly contribute to "well-functioning urban environments" (**WFUE**). While that is AC's prerogative, the FDS seems to place undue weight on these other elements of WFUE while losing sight of economic factors.

The potential downzoning of large swathes of FUZ land is a particular concern because it will erode competition. Indeed, without a strong and ongoing supply of new urban land in strategically chosen locations (like the FUZ), the competitive operation of the region's urban land market will be compromised. At the same time, this FDS does not reflect the community's preferences. According to a survey conducted for PC78, "infrastructure that can cope" matters the most to Aucklanders when planning for more housing. This will be even more important now after the devastating effects of the anniversary weekend floods and Cyclone Gabrielle. Together, these events revealed major vulnerabilities in the region's three waters network and highlighted the risk of excessive intensification (i.e. creating too much impervious surface area in concentrated locations).

Key Findings – Deriving the FDS from the MCA

Lastly, the methodology used to translate the MCA into the FDS' preferred scenario is unclear. Rather than selecting the best-performing option from the MCA, as is usually done, the FDS instead creates a new, hybrid option that lacks any meaningful detail or explanation. In doing so, we consider the FDS to have erred because:

- More than half of all MCA scores (56%) were negative. According to the GSER, these negative scores "indicate the need for a specific policy intervention in addition to, or even instead of, land use or transport interventions alone." However, the FDS does not explain how it reflects or responds to the need for additional interventions to achieve its objectives.

- The FDS has not properly considered Infrastructure implications and instead deems intensification better due to allegedly lower public costs. We disagree. First, most growth-related infrastructure is funded directly by developers, and does not draw on public funds. Second, as already noted, the cost of (eventually) upgrading infrastructure networks in some existing areas could be prohibitively expensive and/or cause unacceptable disruption. Third, the "modelled" differences in infrastructure cost are much less than the MCA scores, commentary, and conclusions suggest. Accordingly, it is difficult to have any faith that the FDS has properly considered infrastructure implications when deriving its preferred scenario.

- Finally. The FDS' desire to spatially align new jobs with new homes implicitly assumes that existing urban areas work best because they let new homes reside near existing employment areas. However, this overlooks the fact that many existing employment areas are nearly fully built-out. Accordingly, new business land will still also be required in the FUZ to keep pace with residential growth and ensure appropriate balances between homes and jobs. Again, however, the FDS' proposal to slash the FUZ does not seem to reflect this.

Overall, we strongly reject the MCA underlying the FDS and urge a complete rethink.

2. Introduction

2.1 Purpose of Report

This report peer reviews Auckland Council's (**AC**'s) *Draft Future Urban Development Strategy* (**FDS**) from an economics perspective, particularly the assessment of options in its *Growth Scenarios Evidence Report* (**GSER**).[1] For brevity, this report addresses only the most substantive issues arising, with a specific focus on the rationale for, and potential effects of, the proposed downzoning of large tracts of Future Urban Zone (**FUZ**) land due to alleged greenhouse gas (**GHG**) emissions impacts.

2.2 Background

Auckland is New Zealand's largest region by far, accounting for a third of its population, and a similar (or higher) share of total economic activity. While population growth slowed temporarily due to the pandemic's effect on migration, strong and sustained growth is still forecast well into the future.

In fact, the latest projections indicate the need for at least another 200,000 homes over the next 30 years, which is more than the current sizes of Hamilton, Tauranga, Dunedin, Queenstown, and Invercargill combined. Solid employment growth is also expected. So, there is still a challenge to ensure that enough homes of the right types and sizes are provided in the right places at the right time to keep pace with demand well into the long term.

The need to plan for strong and sustained population and economic growth is nothing new, though, with the region's current growth blueprint embedded in The Auckland Plan 2050's development strategy. It reflects the culmination of several years' concerted and collaborative effort by AC, local developers, and other key stakeholders (such as central Government and infrastructure providers).

The FDS, however, signals a wholesale departure from the current evidence-based approach to accommodating growth, including the proposed deletion of entire FUZ areas in flood-prone locations, with large chunks of FUZ areas elsewhere placed in limbo pending further investigation.

Given the overwhelming time and resource expended to agree the current approach, as per the Auckland Plan 2050, any proposal to depart from that – like the FDS – must be supported by comprehensive and exhaustive research and analysis that clearly spells out the case for change and proves that the FDS is a superior way forward.

In our opinion, however, the research and analysis underpinning the FDS – particularly its evaluation of different growth scenarios – is materially deficient and falls well short of the evidential threshold that one would rightfully expect given the circumstances.

2.3 Key Issues Addressed & Report Structure

This report focusses on the following aspects of the FDS's growth options assessment, which follow the key steps in the underlying multicriteria assessment (**MCA**):

[1] Available here https://akhaveyoursay.aucklandcouncil.govt.nz/85613/widgets/408922/documents/261986

1. **Option Definition**: The process of identifying and evaluating scenarios is unorthodox and potentially misleading. It incorporates a "utopian" hypothetical option that becomes a fictional benchmark against which the other scenarios are unfairly assessed (**section 3**).

2. **Criteria Identification**: The criteria are not well formulated, and place far too much emphasis on vehicle kilometres travelled (**VKT**) despite the widely-known limited ability for land use controls to materially affect GHG emissions (**section 4**).

3. **Option Scoring & Weighting:** The scoring and weighting of growth options in the MCA appears to skew the assessment towards those that match the FDS' new growth narrative (**section 5**).

4. **Consideration of capacity sufficiency:** The analysis errantly relies on plan enabled capacity, rather than feasible or likely realisable, when assessing the need for - and merits of – the FUZ (**section 6**).

5. **Impacts on Competition, Choice & Affordability**: The analysis pays little attention to impacts on key NPS-UD issues, such as land market competition, plus housing choice and affordability, despite the FDS being a key vehicle for helping achieve such objectives (**section 7**).

6. **Derivation of Preferred Strategic Direction**: Finally, the methodology used to translate the options analysis into the FDS' preferred/composite scenario is unclear and raises many unanswered questions (**section 8**).

3. Scenario Definition

3.1 Introduction

The first step in an MCA is to define the options for assessment. Typically, there are three to four options, with one being the status quo, so that any proposed changes can be readily compared to the current course of action. However, the FDS' approach to option definition is unorthodox and the resulting set of options raises many issues, as set out below.

3.2 Inclusion of Implausible/Extreme Scenarios

The process used to derive the four options and their associated characteristics is slightly unclear, but it has a major bearing on the overall direction and likely findings of the analysis. Of particular concern is the inclusion of an unrealistic benchmark scenario (Scenario A) that assumes different development patterns, home and job locations, and travel habits to the other three scenarios, but which are often masked or not properly acknowledged, causing the other three scenarios to be unfairly assessed.

For example, the executive summary of the GSER simply notes that "four growth options were developed, representing different spatial options for land use, accommodating a consistent quantum of Auckland's growth and change in dwellings and jobs over the next 30 years."[2] Similarly, on page 5, the report goes on to further state that: "four alternative growth scenarios were developed, each representing a different urban form."[3] Clearly, these descriptions imply that the four scenarios are equally plausible but differ (mainly) in their associated urban forms. However, that is not the case.

The fundamental differences between Scenario A and the other three becomes clearer throughout the rest of the document, with numerous obscured soundbites adding important context. For example, the following comment is buried amongst the detail on page 8:

> *"The evaluation found little difference between the scenarios in terms of model outputs relating to travel behaviour, except for Scenario A which…deliberately [included] significant shifts in land use patterns and transport assumptions."*[4]

Digging deeper, I discovered that even the process for deriving Scenario A differed from the others. Specifically, page 12 of the GSER acknowledges that the first three scenarios were derived via workshops held with subject matter experts. Scenario A, conversely, was derived during the development of the Transport Emissions Reduction Pathway (**TERP**) by a smaller subject matter expert group to "reflect a spatial distribution world where climate mitigation and adaptation interventions and land use planning were prioritised over other goals and objectives for the region."[5]

[2] GSER, page 4
[3] GSER, page 5
[4] GSER, page 8
[5] GSER, page 13

This hypothetical fourth scenario (derived by a smaller number of experts outside the workshops held specifically for that purpose) makes many unrealistic assumptions that render it a poor benchmark for evaluating other scenarios.

For example:

- Scenario A Incorporates fundamentally different, unsubstantiated transport assumptions that defy any like-for-like comparison with the other scenarios, including that:[6]
    - People with office jobs work from home 1 day per week (which is about triple the rate assumed for the other three scenarios); and
    - Public transport fares are $2 per trip forever (regardless of trip length/mode); and
    - The uptake of active travel modes is much greater than in the other scenarios.
- Plus, Scenario A assumes much higher levels of job and housing growth "to enable the model to make more decisions on uptake of development capacity including providing a significantly more mixed-use environment to support more dispersed employment locations".[7] Consequently, scenario A assumes much closer spatial matches between the locations of new jobs and new homes than the other scenarios, which directly bolsters its modelled travel benefits.[8]
- Scenario A assumes that relatively high-density development will occur throughout the region, even in remote rural areas, with 80% of future dwellings in rural nodes expected to be "attached" versus only 20% currently.[9]
- In addition, it features a superior public transport network with greater network reach and higher service frequency.
- Finally, Scenario A omnipotently withdraws capacity outside areas for intensification "as a way to influence the model to respond according with the scenario narrative."[10]

Because of these key differences in foundational assumptions, Scenario A is neither plausible nor realistic, so including it is inappropriate as it sets an unfair benchmark against which other scenarios are assessed. Interestingly, even the report itself appears to acknowledge the limited inferential value of this scenario, with the following admission made on page 28:

[6] GSER, page 19

[7] GSER, page 13

[8] This can be seen on page 15, where the assumed locations of new jobs and homes is almost perfectly spatially aligned in Scenario A compared to the other scenarios.

[9] GSER, page 20

[10] GSER, page 13

Figure 1: Excerpt from Page 28 of the GSER

> Overall, Scenario A performed the best across most criteria. Scenario A was specifically developed with significant shifts in land use planning and transport assumptions to better reflect the expectations of the TERP[8], to test whether modelled travel behaviour, mode share and especially transport greenhouse gas emissions would change compared with other scenarios. As such, the fact that Scenario A performed better provides some important lessons but does not necessarily provide the solution for spatial planning. However, these differences also makes it challenging to compare outputs on a like-for-like basis with the other scenarios, particularly when trying to identify the land use, transport, model input or other reason for these differences. The findings from the evaluation of Scenario A and the other three scenarios inform the spatial component of the Future Development Strategy.

In our view, the inclusion of Scenario A has significantly clouded the overall assessment of options and appears to reveal the degree to which some participants have "pushed the envelope" towards an ideologically preferred outcome. Despite all that, Scenario A still did not achieve the ambitious emissions reductions sought via the TERP[11] which, in our view, highlights the risk and futility of focussing too strongly on GHG emissions in developing the FDS.

In a similar vein, scenario D makes little sense because it reflects a highly dispersed urban form that also veers from the current agreed approach and thus is not credible. For context, scenario D sees only 52% of new homes being built inside existing urban areas, with 48% in the FUZ and rural areas. This too is a wholesale departure from the agreed "70/40" split underpinning the current strategy and therefore also has no plausible, real-world basis.

Coupled with the fanciful nature of Scenario A, the unusual spatial definition of Scenario D means that two of the four options are non-starters for determining the best way to accommodate growth in homes and jobs over time.

3.3 Absence of Status Quo Option

Not only is the assessment compromised by the inclusion of two unrealistic scenarios (A & D), which needlessly consume analytical resources while bloating FDS reporting, but there is also no scenario representing the status quo. This is unusual, because the default course of action for virtually any option assessment is to simply "do nothing" and carry on as-is. Absent such an option in the assessment, it is impossible to compare the potential impacts of proposed new directions to the current, evidence-based future development trajectory.

For the record, we note that Scenario C is the closest match to the status quo, but it also includes a series of undocumented adjustments that obscure any efforts to reconcile the proposed new strategic direction with the current agreed one.

[11] See page 31 of the GSER.

4. Evaluation Criteria

4.1 Introduction & List of Criteria

This section addresses several critical issues related to the criteria selected to evaluate options. For ease of reference, the table below lists the 29 criteria in the growth options MCA, which we have grouped according to the key themes emerging.

Table 1: Criteria in Growth Options MCA (grouped by perceived key themes)

Travel Impacts/Accessibility (11 criteria)
Degree to which essential social infrastructure/employment is accessible by multiple modes in high dep. areas
Extent to which education is accessible by different modes (public transport + active modes)
Extent to which employment opportunities are aligned with areas of population growth
Extent to which household living costs can be reduced by increased proximity to employment opportunities
Extent to which key areas of economic activity are accessible by different modes (public transport + active modes)
Extent to which population is exposed to harmful air emissions
Extent to which rural production areas are accessible
Extent to which scenarios promote mixed use communities to reduce travel distances and safety risks
Extent to which scenarios provide improved, inclusive, & equitable access to social infrastructure & public spaces
Extent to which travel times are reliable
The extent to which scenarios impact carbon emissions
Environment (4 criteria)
Extent to which development promotes the restoration/connectivity of indigenous biodiversity
Extent to which development provides opportunities to improve the health of natural wetlands (brownfields)
Extent to which development provides opportunities to improve the health of natural wetlands (greenfields)
Extent to which options reduce the ability to swim safely and collect shellfish
Land & Housing Markets (4 criteria)
Extent to which growth creates greater housing choice to meet projected demand
Extent to which physical constraints increase the cost of development
Extent to which suitable land is available for Group 1 (land extensive) industries
Extent to which the market is likely to respond to the proposed land use pattern
Social/Culture/Heritage (2 criteria)
Extent to which scenarios are likely to result in improved levels of access to quality open space
Extent to which scenarios retain qualities of historic heritage places and values
Economy (2 criteria)
Extent to which opportunities for the agglomeration of similar/dependent industries are provided
The degree to which urban development consumes highly productive soils
Infrastructure (2 criteria)
Extent to which scenarios support current committed infrastructure
The extent to which scenarios result in measurable public monetary costs or losses over time from infrastructure
Māori (2 criteria)
Extent of Māori land within growth areas
Extent to which scenarios impact on Māori cultural landscapes
Natural hazards/Climate adaptation (2 criteria)
The extent of new urban development areas in 100-year floodplains (brownfields)
The extent of new urban development areas in 100-year floodplains (greenfields)

We now discuss several substantive concerns arising from the breadth and depth of these criteria.

4.2 Circularity Between Options & Criteria

The criteria used to assess FDS options reflect the collective input of many stakeholders, particularly the expert group convened to evaluate options. While that is fine, the overall process for deriving the assessment criteria is unclear and has resulted in a troublesome circularity between the scenarios and the criteria evaluating them. For example, page 8 of the GSER states:

> *"While the scores provide a useful indicator of the relativities between the scenarios, there was a strong inter-relationship between the scenarios and the criteria they are measured against. Therefore, the findings drawn from the results of the evaluation are thematic."*

This circularity between options and scores, and the resulting thematic nature of the results, is unusual and highly misleading. The criteria should be derived independently from the options to avoid potential bias, especially when the scores derived in the MCA depend on experts exercising their professional judgement in insolation (evidently) at remote, independent evaluation sessions.

4.3 Decision to Ignore Common Ground

Another issue with the evaluation criteria is the unusual decision to ignore common ground and focus only on option differences. Specifically, page 21 of the GSER lists various evaluation themes (i.e. criteria), which were initially deemed important, but then many are disregarded entirely or considered only fleetingly because the evaluators decided to look only at points of difference. In the words of the report:[12]

> *"Having considered the range of criteria identified, it was then determined that only criteria that would differentiate the scenarios should be taken through into the evaluation process."*

While option differences may be of greater analytical interest than commonalities, omitting criteria where options perform similarly systematically distorts the scale of reported option differences. Conversely, by including all criteria in the assessment, even those where options are expected to perform equally, readers can gain a full picture of option similarities *and* differences.

At the same time, focussing only on differences has meant that several key criteria are not covered in any meaningful detail (presumably because they were deemed by evaluators as areas of common ground), including: [13]

- Development feasibility;
- Housing affordability; and
- Ensuring there is enough land for business.

In our view, the GSER unhelpfully focusses on a carefully curated set of criteria that are designed to amplify option differences while simultaneously masking a high degree of common ground. Overall, this is an unhelpful and misleading way to frame the analysis.

[12] GSER, page 22

[13] See the list of initial criteria themes in Box 3 on page 22 of the GSER.

4.4 Undue Fixation on Travel Impacts & Accessibility

Transport has always been an important consideration to help determine where and when to enable growth in the population and the economy over time, particularly access to public transport and potential for active travel. That said, the FDS appears to place excess weight on travel accessibility and its impacts, particularly since the MCA has no criteria weightings.[14] Absent such weights, the more criteria there are per theme, the greater the weight that theme carries in the assessment.

As per the table above, transport impacts and accessibility – as we have categorised them – account for 11 of 29 criteria (or 38%), compared to only two criteria for natural hazards and climate change adaptation/mitigation (7%). This means that transport and accessibility effects receive more than five times the weight of climate change adaptation and mitigation effects in the growth options assessment (i.e 38% vs 7%). While transport impacts and accessibility *are* important, the FDS's fixation on them is a concern for the reasons set out below.

4.4.1 Future Travel & Emissions are Mostly Baked-In

Auckland's future spatial form, and thus its future transport emissions, are already largely baked-in due to its existing population and economic activity, with growth therefore having only marginal effects overall. This is a key finding of the FDS, which states the below in its executive summary:[15]

> *"Most of Auckland's future spatial form already exists and growth has limited influence."*

Later, on the same page, it elaborates that:[16]

> *"Key destinations for household trips, such as employment areas and education facilities, are well established, so changing the location of future dwellings (e.g. adding more origins) does not materially affect existing travel patterns other than reinforcing them by adding more trips."*

Indeed, with 1.7 million existing residents, the region's spatial form is mostly "baked-in" with growth representing only small changes. Consequently, focussing on marginal changes in $C0_2$ emissions between growth options, while placing little weight on other important factors, seems inappropriate and ultimately unhelpful.

4.4.2 Cars Account for Only a Small Share of Total CO_2 Emissions Anyway

Not only will the FDS have trivial impacts on the region's future emissions profile, but light passenger vehicles (i.e. cars) also account for only a modest fraction of national CO_2 emissions anyway. This is illustrated in the table below from the latest Greenhouse Gas Inventory (published in 2023).[17] It shows that cars produce only 8% of total (gross) CO_2 emissions, and hence that policies aimed at curbing GHG emissions from cars will have limited impacts on meeting national emissions targets.

[14] GSER, page 21
[15] GSER, page 8
[16] GSER, page 8
[17] https://www.mfe.govt.nz/climate-change/state-of-our-atmosphere-and-climate/new-zealands-greenhouse-gas-inventory

Table 2: Shares of Gross $C0_2$ Emissions by Group in 2021

Emitter Groups	$C0_2$ Emissions Shares
Agriculture	49%
Manufacturing	8%
Energy Producing Industries	7%
Industrial Processes	6%
Other Productive Sectors	6%
Road Transport - Cars	8%
Road Transport - LCVs	3%
Road Transport - HCVs	5%
Other Transport	2%
Waste/Tokelau	4%
Fugitive Fuel Emissions	1%
Total	**100%**

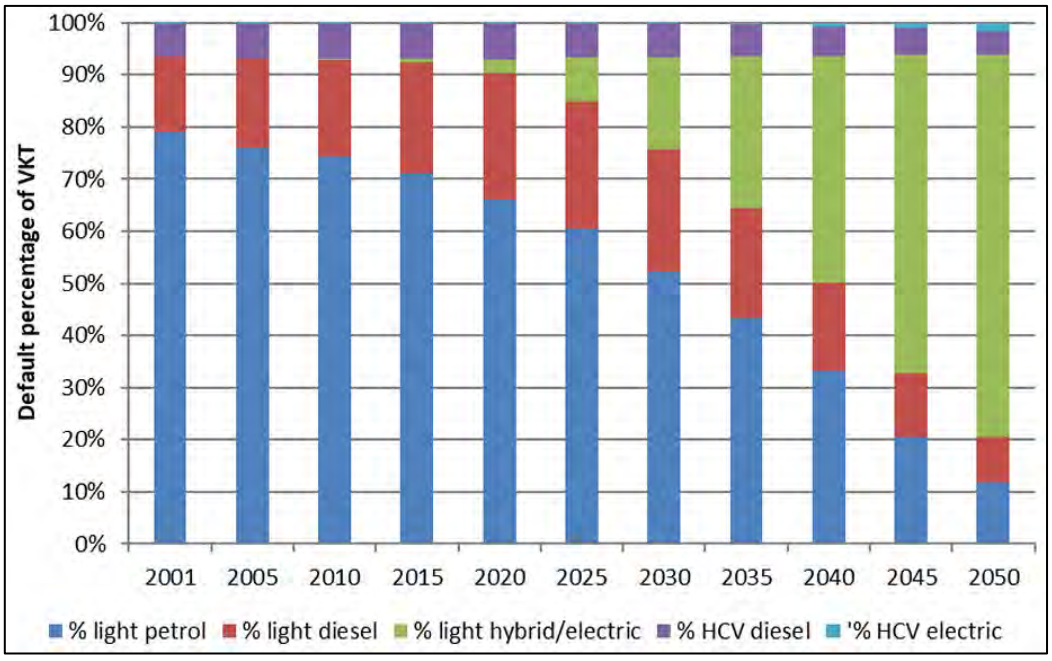
4.4.3 Car CO_2 Emissions Are Falling Rapidly Already

Not only do cars account for a slim share of national CO_2 emissions, but the average CO_2 emissions of cars is already falling due to rapid shifts towards electric, hybrid, and other low-emissions vehicles. This is illustrated in the chart below, which shows the projected composition of future VKT according in the Vehicle Emissions Prediction Model (**VEPM**), developed jointly by Waka Kotahi (**WK**) and AC.

In the graph below, the:[18]

- Blue segments represent the share of total VKT by petrol-powered cars, and
- Green segments represent the share of total VKT by hybrid and fully electric vehicles.

Figure 2: Historic & Projected Shares of VKT by Vehicle Type and Motive Power



[18] https://www.nzta.govt.nz/assets/Highways-Information-Portal/Technical-disciplines/Air-quality/Planning-and-assessment/Vehicle-emissions-prediction-model/VEPM-6.3-technical-report-2022.pdf

Figure 2 above shows that petrol-powered cars accounted for nearly 80% of total VKT in 2001, but will reach about 60% by 2025. By 2050, petrol cars will account for just over 10% of total VKT, with hybrid and electric cars accounting for more than 70%. Given this rapid background trend, it follows that trying to reduce Co2 emissions via the spatial location of new jobs and homes will have very little impact overall and thus is not an appropriate primary focus for the FDS.

Interestingly, the relative importance of fleet electrification, and the limited scope to affect change via land use controls, was clearly acknowledged in the Auckland Climate Plan (**ACP**), which the FDS seeks to give effect to. For example, the ACP notes the following emissions reduction potential by policy initiative (on page 51):

- Remote working and reduced trip lengths –10% emissions reduction.
- Shifts to PT, walking and cycling – 14% emissions reduction.
- Switching to low-emissions vehicles – 55% emissions reduction.

Given that the FDS will have only minor impacts on the first two categories, its overall potential to accelerate ongoing CO_2 emissions reductions is limited and must be recognised as such.

4.4.4 FUZ GHG Analysis is Flawed & Misleading

According to the FDS, large areas of FUZ are pending further investigation due to natural hazards and the potential for higher-than-desired GHG emissions. We agree that development should be managed in flood-prone areas, or those at undue risk of natural hazards. However, we fundamentally disagree with potentially downzoning large swathes of FUZ due to estimated GHG impacts, because the underlying modelling is stacked against the FUZ. We elaborate below.

To estimate the future GHG emissions of different growth nodes, including the FUZ, various transport and land-use models were run iteratively to determine origin-destination matrices showing the travel patterns for 554 zone (i.e. locations) across Auckland. Mapping those fine-grained model zones to AUP zones, the travel impacts of each growth scenario could be readily estimated.

While the overall modelling approach is fine, the analysis captured only the current snapshot (as at 2022), when many FUZ locations were not well-developed and had relatively poor balances between homes and jobs. In short, by failing to reflect the self-sustaining future state of each FUZ area due to a balanced provision of residential *and* business land (as per their structure plans), the modelling grossly overstates the likely travel impacts of FUZ areas. This major limitation of the VKT and GHG assessment is documented on page 82 of the Future Urban Areas Evidence Report, as per the screenshot below.[19]

[19] Future Urban Areas Evidence Report, page 82.

Figure 3: Caveat of the Future Urban Areas Evidence Report Transport and GHG Assessment

- Presented data is a snapshot in time – some locations may be quite early in their development cycles and (modelled) travel behaviour may change as a result of further development (eg a FUA develops with stage 1 mostly residential, stage 2 mostly employment, but at the time of assessment, only Stage 1 residential development is underway, with PT services expected later, leading to long Car commutes (high VKT and low population) for early residents)

To understand the implication of this, consider the plight of Milldale and the FUZ surrounding it. Not only is Milldale one of New Zealand's largest residential subdivisions, but it is also adjacent to Silverdale West, where about 600 hectares of light industrial land will eventually be live-zoned. However, because the travel analysis reflected only the situation in 2022 when the Silverdale West business node was yet to commence, the travel impacts of Milldale and surrounding FUZ areas were systematically overstated. Conversely, if the model had been rolled forward to include the future employment area nearby, plus the various commercial areas yet to be fully developed within Milldale, its modelled impacts would differ vastly. The same applies in other FUZ areas where residential growth has preceded job growth, or vice versa.

Interestingly, despite this inherent bias against the FUZ, the modelling still showed that people living in the FUZ would generate near-identical rates of CO_2 to those in the existing urban area. In fact, the modelled car CO_2 per household for the FUZ was *lower* than for the existing urban area. See Table 3 below.[20]

Table 3: Outputs of Travel Model for CKT and CO2 by Household Origin

Origin	VKT/Car/Household	Car CO_2/household
Existing urban	48.60	3.31
FUZ	50.59	3.30
Rural	69.74	4.51
Out of Region	51.94	3.40
Total Auckland	**50.39**	**3.40**

4.4.5 Failure to Consider Other Options to Reduce CO_2 Emissions

Reducing CO_2 emissions is a task shared by all levels of Government, each with its own set of levers. For example, Central Government can introduce emissions standards for vehicles entering the fleet, or it can raise petrol taxes, to name but a few. Local Government, on the hand, has a smaller set of tools to play with, so the focus appears to have settled on the use of land use controls to reduce average travel distances.

We agree that shorter trips and greater use of public transport and active modes are important policy targets for Local Government. However, they are not the only tools available, with others being important additions. For example, the ACP identifies the following other ways to help improve Auckland's future GHG emissions profile (some of which may require central Government support):

[20] Future Urban Areas Evidence Report, page 91.

- Reduce private vehicle travel and encourage lower emissions travel options by introducing pricing and parking measures[21]; and

- Implement policies and regulations that facilitate faster uptake of lower emissions vehicles.[22]

And, according to recent policy research, travel demand management (**TDM**) measures like road pricing and parking charges are more effective at reducing VKT than land use controls or mode shifts to public transport (**PT**).[23]

4.5 Intensification Amenity Effects

Unlike its strong focus on transport, the FDS appears to pay little – if any – attention to the potential adverse effects of intensification even though they will vary by scenario. These effects have been widely canvassed in recent policy work, both here and overseas, including a cost benefit analysis completed by Sense Partners and PWC for the MDRS.[24] It identified the following common adverse amenity effects of intensification, none of which appear to be adequately considered in the FDS, particularly for scenario A that relies on widespread intensification.

- Loss of views;
- Shading and loss of sunlight;
- Noise pollution; and
- Light pollution.

Note: while the NPS-UD & MDRS accept that such effects will occur and implore Councils to enable intensification anyway, they are still relevant to the comparison of options (from an economic perspective) but are notably absent from the assessment.

4.6 Impacts on Housing Sufficiency, Choice & Affordability

Finally, we note that the FDS provides very limited coverage on key NPS-UD objectives, such as land market competition, capacity sufficiency, housing choice, and affordability. Given the significance of these concerns, they are addressed separately in sections 6 and 7 below.

[21] ACP pages 82 and 142

[22] ACP page 144

[23] See, for example, the findings of this report: https://www.transport.govt.nz/assets/Uploads/Discussion/DiscussiondocumentHikinateKohuparaKiamaurioraaiteiwiTransportEmissionsPathwaystoNetZeroby2050.pdf

[24] https://environment.govt.nz/assets/publications/Cost-benefit-analysis-of-proposed-MDRS-Jan-22.pdf

5. Option Scoring & Weighting

5.1 Introduction

Once growth options/scenarios and evaluation criteria are identified, the next step in an MCA is to score options against criteria, before weighting the scores to derive an overall ranking of options. In this section we discuss several issues related to the scoring and weighing of criteria.

5.2 Reliability of Model Inputs & Outputs

According to the GSER, the scores derived for each criterion reflect the outputs of an iterative modelling exercise combined with expert judgement. While we agree that a wide range of complementary quantitative and qualitative data should be used to score options wherever possible, we have some concerns about the reliability of the model's inputs and outputs.

First, some of the model's inputs are out-of-date. For example, the modelling assumes the need to accommodate an extra 408,000 dwellings and 380,000 jobs over the next 30 years, compared to only about half that amount in the FDS itself. By modelling much higher levels of growth than are now anticipated, the analysis overstates the travel (and GHG emissions) impacts of each option.

Other inputs of concern include the unreferenced and unsubstantiated assumptions that:

- A city centre cordon and road pricing are in effect from 2031 and 2041, respectively[25]
- Infrastructure required for all options is technically feasible[26]

While the latter is likely for the FUZ where infrastructure requirements have been closely studied, the same cannot be said for the infrastructure required to support widespread intensification under PC78 (whose newfound capacity is integral to the FDS's proposed new direction).

Second, the reliability of the model's processes, and hence outputs, is also a concern. For example, page 12 of the GSER admits that the model crashes and breaks if there is insufficient capacity, which raises concerns about its robustness and reliability. Further, page 18 of the GSER admits that the model has limitations around capturing behaviour change even though that is critical to realising the alleged benefits of certain scenarios. Even worse, page 24 states that:

> *"To direct 'take up' to specific locations sometimes required plan-enabled capacity to be reduced or capped to limit take up and force the model to develop in accordance with the scenario narrative."*

This is a startling confession. Interfering with the model's operation and forcing it to take actions that suit a scenario narrative directly invalidates its outputs and casts serious doubt over the objectivity of the overall modelling process itself.

[25] GSER, page 17

[26] GSER, page 18

5.3 Reliance on Expert Judgement

We are also concerned that expert judgement has played such a major role in scoring the scenarios. For example, the following matters were primarily evaluated by the subject matter experts:[27]

- Natural hazards
- Carbon emissions
- Housing choice
- Biodiversity
- Health of water bodies
- Water quality
- Highly productive soils
- Natural and built heritage
- Access to social infrastructure
- Air quality
- Māori and cultural landscapes
- Costs of development
- Infrastructure
- Market feasibility

These considerations are broad and far reaching, so it is essential that an appropriate mix of experts is used to assess them. However, the number of experts engaged, their qualifications, experience, and areas of expertise are not divulged, which raises concerns that a sufficiently deep and broad mix of expertise has been brought to bear. This is compounded by a comment on page 25 of the GSER which identifies the expert group as comprising only members of the (unnamed) project team plus subject matter experts from Council departments and CCOs.

In our view, the absence of any expert input from other key stakeholders, such as FUZ landowners, dramatically reduces the credibility and reliability of scores derived via expert judgement.

5.4 Many Criteria are Assessed by Narrow/Misleading Measures

There are also several specific scoring issues that appear to hamper the assessment's reliability and directly reinforce scenarios that fit a particular narrative.

The first specific scoring issue is that many criteria in the MCA are assessed against measures that appear unduly narrow, incomplete, or misleading. These include:

- **Access to open space** is measured by the number of households and people within a walkable catchment of an open space that is at least 3000m^2.[28] Not only is this size threshold arbitrary, but the criterion itself does not consider the quality of the experience, nor the likelihood of congestion occurring at existing parks in scenarios with high intensification.

[27] GSER, page 25

[28] GSER, page 36

- The **extent to which population is exposed to harmful air emissions** from transport focusses on the *generation* of emissions, not the population's *exposure* to them.[29] This is highly misleading given the criterion's title, and it obscures the likely health impacts of scenarios that rely on high levels of intensification (such as Scenario A). Instead, this criterion assigns scenario A the highest score possible.

- **Access to social infrastructure** was defined to include access to hospitals via active modes or PT.[30] We consider this unhelpful because hospitals are visited only seldomly. And, when they are accessed, it is usually in a hurry via a car or ambulance. Accordingly, the accessibility of hospitals via PT and active modes is a crude and very narrow way to measure each option's access to social infrastructure.

- Similarly, **access to social infrastructure and employment in high deprivation areas** is partly based on accessibility to tertiary education via active modes or PT.[31] Again, however, very few regional residents are enrolled in tertiary education, so this is an unduly narrow way to measure the overarching criterion. Not only that, but many people are now regularly accessing tertiary education online.

- The **extent of Māori land within growth areas** was crudely inferred via GIS estimates of proximity to Marae and other similar landmarks, without any input from Mana Whenua, despite the assessment recognising that:[32]

  > *"Only Mana Whenua can determine what impact the scenarios would have on Māori land and what types of Māori land are of greatest priority…[but the assessment] does not represent the views of Mana Whenua."*

- **Accessibility to key economic activity** was measured in reference to only the city centre, airport, metropolitan centres, and town centres. While those undoubtedly are areas of key economic activity, they are not the only ones. Others that could/should have been included are the large swathes of business/mixed-use/light industrial zones that span the region:[33]

- **Access to education** was measured by access to tertiary education by PT and active modes.[34] However, as already noted, only a small share of the region's population is engaged in such study and many are now studying online. Moreover, students enrolled in tertiary education are likely to self-select living locations that are relatively close to their place of study, so this specific measure is of limited value for differentiating options.

[29] GSER, page 37.
[30] GSER, page 40.
[31] GSER, page 41.
[32] GSER, page 43.
[33] GSER, page 45.
[34] GSER, page 47.

- **Household living costs** are measured by the extent to which living costs can be reduced by increased proximity to employment opportunities. However, according to the Household Economic Survey (**HES**), transport costs are only about 10% of weekly household spending. Coupled with the fact that travel to work accounts for only 20% of weekly travel, this criterion effectively focuses on an issue that represents only about 2% of weekly spending.

- **Costs of development** were measured only by the extent to which physical constraints (like contour or instability) may affect them.[35] This is an incredibly narrow view of development costs and, amongst other things, overlooks the effects of lower land market competition on section prices. At the same time, it penalises development in newer areas where land is yet to be shaped and readied for buildings, while glorifying intensification, despite noting that:

  > *"At the evaluation workshop, the relativity between scenarios was agreed because Scenario D takes development into more marginal land. However, it is also acknowledged that within existing urban areas there may be additional development costs that are not addressed by the evaluation."*

- **The extent to which the market is likely to respond to the development pattern** conflates areas with high land value as areas that are attractive to the market, even though the opposite is often the case.[36] i.e. the market often prefers lower cost options.

5.5 Cardinal Nature of Model Outputs Not Reflected in Scores

The next specific scoring issue is that the cardinal nature of the modelling outputs is not reflected in the MCA scores. For example, an option may have scored only slightly better than another on a particular criterion according to the modelling, but the MCA scores imply that it performed two or three times better overall. This issue affects at least four of the MCA's 29 criteria, including:

- The extent to which scenarios impact carbon emissions (page 32);

- Mixed use communities (page 40);

- Accessibility to key economic activity (page 45); and

- Infrastructure costs (page 55).

5.6 Scoring Does Not Reflect Preceding Discussion

Finally, we note that the scoring for several criteria do not reflect the preceding discussion in the GSER. This issue affects at least six of the MCA's 29 criteria, including:

- The degree to which urban development consumes highly productive (page p35);

- Housing choice (page 39);

[35] GSER, page 56.

[36] GSER, page 57.

- Access to social infrastructure by high deprivation areas (page 42);
- Access to education (page 47);
- Household living costs (page 50); and
- Costs of development (page 56).

5.7 Decision Not to Weight Criteria

As noted earlier, the expert evaluators made the unexplained decision not to weight the criteria when assessing options. This is highly unusual, and it directly elevates the importance of some factors while systematically downplaying others. That's because, absent weights, the more criteria per theme, the greater the weight afforded that theme in the evaluation, and vice versa.

For example, suppose that one theme is measured by 10 criteria, while another theme is measured by only two criteria. If weights are not applied, the first theme carries five times as much weight in the overall MCA than the other. Usually, this is addressed by applying weights that mitigate differences in criteria breadth and depth, but that is not the case here.

The following table puts the issue in context by showing the share of the MCA's 29 criteria that fall into (our suggested) evaluation themes, and the implied weighting on each overall. Clearly, the absence of weights causes some themes to be given excess weight at the expense of others, which lacks explanation and almost invariably distorts the assessment of options.

Table 4: Number of Criteria and Implied Weighting by Evaluation Theme

Evaluation Themes	**Number of Criteria**	**Implied Weight**
Travel Impacts/Accessibility	11	38%
Environment	4	14%
Land & Housing Markets	4	14%
Social/Culture/Heritage	2	7%
Economy	2	7%
Infrastructure	2	7%
Māori	2	7%
Natural hazards/Climate adaptation	2	7%
Total	**29**	**100%**

6. Consideration of Capacity Sufficiency

6.1 Introduction

The NPS-UD requires Auckland, like all high growth areas, to provide at least sufficient housing and business capacity to meet demand (at all times) right through to the long term, including providing a range of options to meet varying needs, preferences, and budgets. The NPS-UD also specifies different types of capacity that must be assessed, which vary according to whether they are:

- Plan-enabled;
- Serviced (or serviceable) with infrastructure;
- Feasible for development; and
- Likely to be realised over each NPS-UD timeframe.

These different measures of capacity are critical to understanding whether planning decisions, such as future development strategies, enable enough capacity to meet likely future demand. Unfortunately, however, the FDS remains relatively silent on these matters and appears to pay little attention to capacity sufficiency. We elaborate briefly below.

6.2 Reliance on PC78 Plan-Enabled Capacity

Section 3.3 of the FDS addresses development capacity, albeit only at a high level. It refers to plan-enabled capacity for an additional 2.35 million additional dwellings, much of which stems from recent theoretical capacity uplifts ushered in by PC78. For ease of reference, the table below shows the broad location of this plan-enabled capacity relative to the distribution of existing dwellings.

Table 5: Location of Plan-Enabled Capacity Relative to Existing Spatial Form

Existing urban	% of Existing Dwellings	% of Plan-Enabled Capacity
Central City	5.0%	3.5%
Inner Suburbs	3.4%	1.5%
Eastern Brownfield	10.9%	10.9%
Isthmus Brownfield	26.9%	26.0%
Northern Brownfield	16.4%	16.2%
Southern Brownfield	13.2%	16.2%
Western Brownfield	6.7%	6.6%
Greenfield		
Northern-western Greenfield	10.9%	9.1%
Southern Greenfield	1.5%	3.0%
Rural		
Northern Towns	1.6%	2.4%
Rural	1.0%	0.7%
Southern Towns	2.6%	3.8%
Auckland Totals	**100.0%**	**100.0%**

An important observation from this table is that PC78 has boosted capacity in relatively remote existing urban locations, such as southern Brownfield where job accessibility is poor, but produced very little capacity in areas that are favoured by the growth options assessment. For example, the city centre accounts for 5% of existing dwellings, but only 3.5% of plan-enabled capacity. Similarly, the inner suburbs account for 3.4% of existing dwellings, but only 1.5% of plan-enabled capacity. On

the other side of the ledger, northern and southern rural towns account for a notably higher share of plan-enabled capacity than their corresponding shares of existing dwellings.

Thus, while PC78 may enable unprecedented levels of plan-enabled capacity, it does not necessarily help meet the region's goal of a compact urban form. In fact, because the capacity uplifts caused by PC78 are inversely proportional to the density already enabled by the AUP, it significantly boosts capacity in peripheral locations, but has relatively little impact in and around centres where higher density is already permitted.

This is reflected in the excerpt below, which shows the location of plan-enabled capacity relative to the city centre.[37] Given these insights, it is important not to get waylaid by the very large (aggregate) plan-enabled associated with PC78 and instead drill-down to consider whether that supposed theoretical capacity helps achieve the desired compact urban form. Potentially not.

Figure 4: Location of PC78 Plan-Enabled Capacity Relative to City Centre

5.2.4 Enabled Capacity by Distance from the CBD

The plan-enabled capacity in each travel distance band from the city centre is shown in Table 5-1, and compared with existing dwelling numbers. The plan-enabled capacity increases with distance outward from the city centre. Under the current AUP, there is plan -enabled capacity for close to 231,000 dwellings within 6km of the centre. The NPSUD/MDRS provisions without QMs would enable some 371,000 dwellings. With all QMs in place, the plan-enabled capacity would be some 276,000 dwellings. This is about 3.8 times the current 79,000 dwellings there.

Table 5-1 : Plan-Enabled by Distance from CBD

Distance from CBD (km)	Existing Dwellings	MDRS/ NPSUD No QMs	MDRS/ NPSUD (with all QMs)
0-2	28,800	96,500	90,000
2-3	13,500	67,900	40,000
3-4	10,500	57,700	36,100
4-5	10,900	61,400	44,600
5-6	15,200	87,500	65,000
0-6	79,000	371,000	276,000
6-10	87,000	478,900	414,600
10-12	45,100	304,900	281,200
12-15	66,700	411,100	370,300
0-15	278,000	1,566,000	1,342,000

Source: Housing Enablement Model 2022

Another issue is that PC78 is now effectively on hold, so it seems inappropriate to continue relying on its potential theoretical capacity. If PC78 is later withdrawn or revised substantially, there may be major implications for capacity sufficiency, but this is not properly acknowledged in the FDS. Moreover, plan-enabled capacity is a purely theoretical metric that has no real-world meaning, so relying on it here is, in our view, imprudent.

[37] PC78 Economy Matters section 32 report, page 99.

6.3 Assessing Serviceability, Feasibility & Realisability

Another concern is that FDS does not explicitly consider the infrastructure serviceability of growth associated with each scenario. Instead, it simply assumes that any infrastructure required to service growth will be technically feasible.[38] That will not always be the case, though.

Take, for example, the upgrading or replacement of a water or wastewater trunk main through a densely developed part of the existing urban area. The disruption associated with such an upgrade may render it technically (and/or practicably) infeasible, and this is more likely for growth scenarios that rely heavily on intensification. Again, however, this is not addressed in the FDS.

Similarly, the FDS and its accompanying evidence reports does not appear to properly consider financial feasibility. Instead, it invokes the following logic, presumably as a reason not to bother.[39]

Figure 5: Future Urban Areas Evidence Report Comments on Residential Capacity

1.3.5 Residential development capacity

The statutory requirement to apply MDRS to Auckland's residential zones has changed the development landscape by substantially increasing residential development capacity.

The draft FDS meets the statutory requirement under the NPS-UD to ensure there is at least sufficient housing and business development capacity to meet demand over the next 30 years. (Auckland Council, 2023d). Therefore, the draft FDS does not focus on identifying significant additional plan enabled development capacity. The focus is rather on the quality aspects of accommodating growth; where and how development take-up occurs.

This sentiment is echoed in the FDS itself, which states that plan-enabled capacity is several times the level of expected demand[40], which evidently provides some latitude. Then, it claims that "much of this enabled capacity is or will be commercially feasible" but that not all needs servicing now.

We consider it inappropriate to merely assert that a high proportion of plan-enabled capacity will be feasible without doing the work to prove it. Indeed, development feasibility has changed dramatically over the last few years due to the compounding effects of lower house prices, higher construction costs, and significantly higher interest rates. Together, these changes conspire against feasibility and may result in a shortfall, particularly over the longer term.

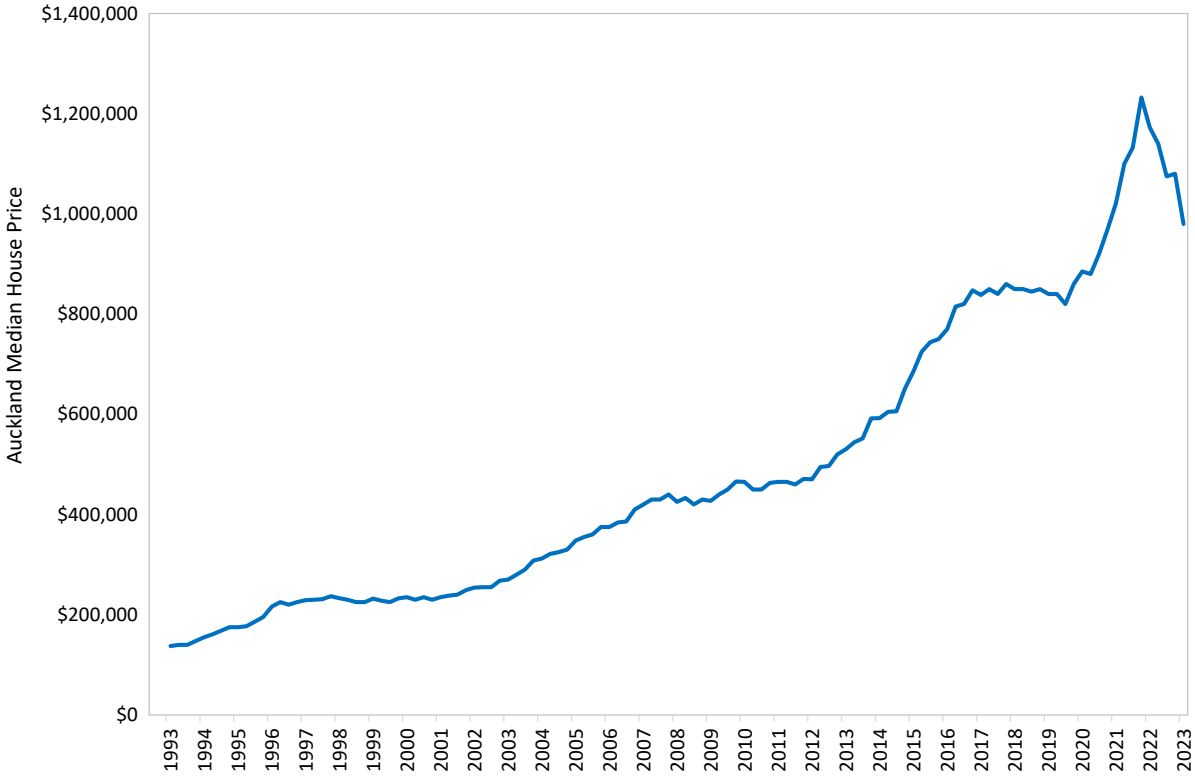
For context, the chart below shows how Auckland's median house price has tracked over time. While it has climbed steadily since the early 1990s, the region's median dwelling price has fallen precipitously from about mid-2021 onwards (when the FDS' modelling appears to have been done). In fact, the median price has fallen from $1.23 million in mid-2021 to only $980,000 in early 2023, a drop of more than $250,000 (or 20%) in less than two years. Coupled with the near-30% increase in residential construction costs over the same period, it should be clear that development feasibility has changed fundamentally and hence that relying on previous feasibility analyses is inappropriate.

[38] GSER, page 18.

[39] Future Urban Areas Evidence Report, page 14.

[40] FDS, page 29

Figure 6: Auckland Median Dwelling Price (from NPS-UD dashboard)



Not only does the financial feasibility of development appear to mostly be overlooked by the FDS and the GSER but, when it is considered, it is via an unorthodox approach that is unlike anything we've ever seen before. Specifically, the GSER summarises its approach to estimating development attractiveness and feasibility as follows:[41]

> *"The attractiveness of a [MSM transport] zone is determined through the land use model based on various aspects. Firstly, it looks at the permissible development (capacity together with the projected household and employment growth) to determine how much additional development is required to accommodate growth.* ***It then looks at the "rent values" in each to determine which zones are profitable to develop*** *(from developer's point of view higher rent means more profit). Baseline rent values are from the Council's rating database."* [emphasis added]

In terms of likely realisable capacity, the FDS appears to rely on historic uptake to determine that sufficient realisable capacity exists. Specifically, it states:[42]

> *"Take-up has been high in almost all areas where intensification has been enabled by the AUP, including in relatively low land-value locations. Ongoing take-up of these opportunities is reasonably expected wherever they are provided."*

We agree that take-up will continue, but not necessarily like it has before. First, financial feasibility has changed substantially. Second, many of the best intensification opportunities have already been

[41] GSER, page 24
[42] FDS, page 30

taken up, with remaining ones likely to be more marginal. Third, the capacity unlocked by PC78 is not like the capacity unlocked by the AUP, so this statement is a false equivalence.

6.4 Consideration of Business Land Needs

Finally, we note that the FDS appears to pay scant attention to ensuring that sufficient business land is provided in the right places at the right time to keep pace with demand. Instead, the FDS simply asserts that:[43]

> *"There is likely to be at least sufficient plan-enabled business capacity on an aggregate, region-wide basis."*

However, this is immediately qualified in the next paragraph as follows:[44]

> *"Shortfalls in some sub-regions, or for specific business sectors, particularly for land extensive sectors could occur in the short to medium term. Over the medium to long-term, these are planned to be addressed by the provision of additional business-zoned land, including through the provisions of new centres in new development areas."*

We agree that there will be shortfalls in business capacity over the short- to medium-term for certain parts of Auckland and/or specific business sectors. This is reflected in the current, historically low vacancy rates prevailing in many of the region's business property markets.

For example, a Colliers research report for the first quarter of 2023 noted that the region's industrial property market had reached a historically low level of vacancy, with the vacancy rate for prime industrial properties falling to only 0.5%.[45] In some southern industrial areas, such as Manukau/Wiri and East Tamaki, there were virtually no vacancies as at the time of their survey. This is a concern, because a lack of vacant premises stifles opportunity and may even cause some businesses to be displaced to other regions, such as the large new business area in Pokeno.

Other recent research reports draw similar conclusions. For example, Bayleys[46] recently noted that "historic low levels of vacancies, combined with strong demand from occupiers, is often resulting in spaces being leased well in advance of actual lease expiry dates or physical vacancies." This is highly unusual and reveals the extent of current industrial land shortages.

The Bayleys report goes on to state that "persistent shortages of industrial land have led to substantial growth in prices. Would-be owner occupiers are increasingly having to extend their search perimeters [sic] out to the fringe of the region or even into other regions." Other research by CBRE[47] and JLL[48] also report incredibly low vacancy rates for many business property markets, which confirms an acute need to provide additional business land now.

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[43] FDS, page 31

[44] ibid

[45] Colliers, Auckland Industrial Snapshot for Q1 2023, page 1.

[46] Bayleys, Industrial Market Update, Auckland Q1 2023

[47] CBRE, Auckland Property Market Overview, Q1 2023

[48] JLL, Market Snapshots Q1 2023.

Despite this backdrop of a dearth of available business land, the FDS appears to take a rather cavalier attitude to planning for growth in business activity. It cites fanciful estimates of vacant and vacant potential capacity within existing business areas[49] and appears to presume that this can meet short to medium term needs.

Not only do we categorically reject the FDS' estimates of additional business capacity residing within existing areas, but we also consider its assessment of the need for additional business land to be internally inconsistent. On one hand, it notes that at least 1,000 hectares of business land will be needed in new urban areas, but on the other it appears to delay the rezoning/enablement of them. For example, it seems that the rezoning of the Silverdale West business area has been pushed back despite being a critical part of the blueprint for that area.

In our view, the FDS's approach to business land is reckless. Not only will it starve the market of much needed boosts in supply to rectify existing shortfalls and keep pace with projected growth in demand, but it will also push up land prices and thereby undermine affordability for businesses looking to establish, expand, or relocate within the region.

[49] For example, it estimates unrealistic levels of plan enabled capacity above ground floor in areas where ground floor locations are not only preferred, but often essential for access and other reasons.

7. Impacts on Choice & Competition

7.1 Introduction

Just as the FDS provides only very limited commentary on capacity sufficiency, so too does it pay surprisingly little attention to other NPS-UD objectives, such as land market supply, competition, plus future housing choice and affordability. We briefly touch on these issues below.

7.2 Importance of Fostering & Maintaining Competition

A key plank of the NPS-UD is to foster and maintain competition in both land and development markets. For example, Objective 2 of the NPS-UD seeks that:

> *"Planning decisions improve housing affordability by supporting competitive land and development markets."*

This is given effect to via Policy 1 of the NPS-UD. It requires planning decisions to contribute to well-functioning urban environments, which (amongst other things):

> *"Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets."*

At a more prescriptive level, the NPS-UD requires Tier 1 territorial authorities like AC to complete a housing and business capacity assessment (**HBA**) triennially to inform its Long-Term Plan (**LTP**), with clause 3.23 specifically requiring that:

> *"Every HBA include analysis of how the relevant local authority's planning decisions and provision of infrastructure affects the affordability and competitiveness of the local housing market."*

Notwithstanding this unambiguous policy direction, though, the FDS provides no analysis of likely effects on competition. This seems to reflect AC's apparent perspective that:

- The introduction of the concept of "well-functioning urban environment" (**WFUE**) has shifted the focus of the NPS from an economically driven policy (like its predecessor, the NPS-UDC) to one that incorporates a range of non-economic factors; and

- Although WFUE has mandatory elements, Councils can add to them. AC has added numerous non-mandatory elements to its definition of WFUE and formulated a set of assessment criteria that seem to weigh these more heavily than some of the mandatory criteria; and

- The words "limit as much as possible adverse impacts on" in Policy 1(a)(d) imply that it is anticipated that planning for other aspects of well-functioning urban environments will generate some adverse impacts on competitive land markets, which are therefore acceptable in NPS-UD terms, which helps justify its decision to curtail FUZ opportunities.

While AC is correct that it can include non-mandatory factors in its definition of WFUE, this should not be at the expense of other core purposes of the NPS-UD. To be frank, it appears that the FDS has placed undue weight on these new elements of WFUE while losing sight of economic factors (such as supporting housing affordability and enduring competitive land markets). These remain key focuses of the NPS-UD, but the FDS does not adequately capture that.

In particular, the potential downzoning of large swathes of the FUZ is a significant concern in terms of fostering and maintaining competition. Without a strong and ongoing supply of new urban land in strategically chosen locations (as per the current development strategy), the competitive operation of the region's urban land market will be compromised. Economic theory explains the potential risks of this loss competition as follows:

- **Preventing Market Power and Monopoly**: Competition prevents the concentration of market power and the emergence of monopolistic practices in land markets. If a single entity or a small group of firms dominates the market, they can exert control over prices, limit choices, and stifle competition. Competition avoids this prospect by enabling multiple buyers and sellers to interact within local land markets.

- **Consumer Choice and Affordability**: Competition enhances consumer choice and promotes affordability in land markets. When there are many developers and landowners competing for buyers or tenants, consumers have a wider range of options to choose from. This competition exerts downward pressure on prices, making land and housing more affordable for a broader segment of the population. Moreover, competition encourages developers to differentiate their offerings by providing better amenities, quality construction, and innovative designs.

- **Price Discovery**: Competition enables price discovery. When multiple buyers and sellers actively engage in a market, they compete to buy or sell on the best possible terms, thereby enabling "discovery" of the current market price (where supply and demand meet). This ensures that market prices better reflect the true value of land based on its size, location, potential uses, and other valued attributes (rather than the profit-seeking behaviour typical of monopolies).

- **Efficiency and Productivity**: Competition fosters efficiency and productivity in land markets. In competitive environments, developers and landowners strive to maximise returns by using land resources optimally. This fosters innovative land uses, such as mixed-use development, and adaptive reuse of existing structures. Competition drives developers to find creative solutions to meet the changing needs of residents, leading to improved productivity and efficient land utilisation.

- **Investment and Development**: Competition also attracts investment and spurs development in nearby areas. When developers and investors perceive a viable market, they are more likely to invest in land and undertake development projects. The prospect of earning profits

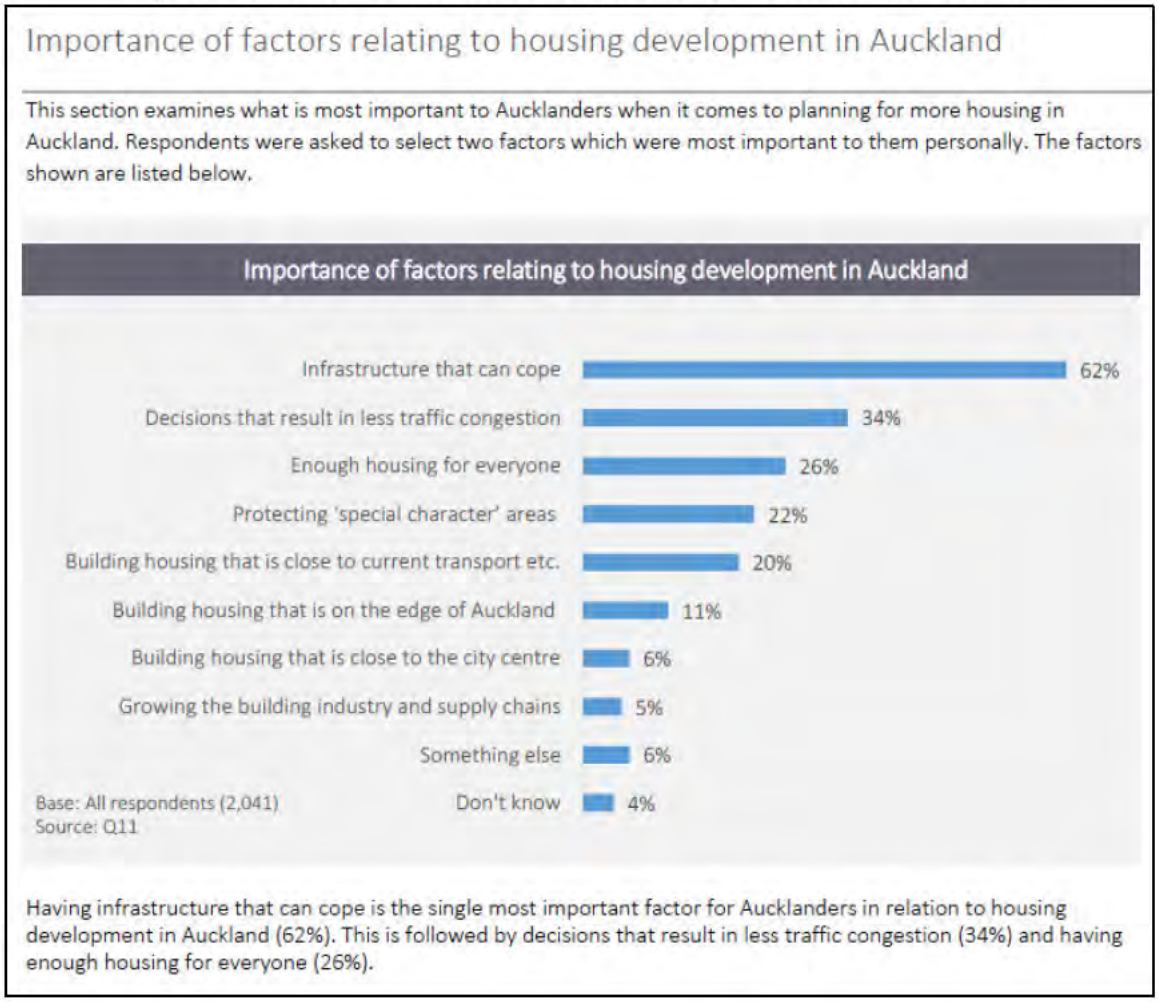
motivates developers to take risks and initiate new projects. Increased investment and development activities contribute to economic growth and job creation.

Overall, we are concerned about the FDS's potential impacts on competition. The large volumes of theoretical capacity unlocked via PC78 are not complete substitutes for competition in regional land markets. And, absent the latter, land prices will rise, flowing directly into new dwelling prices.

7.3 Providing Housing Choice & Reflecting Community Values

Finally, we note that it is critically important that the FDS promotes housing choice and reflects what's important to residents and businesses. In our view, the FDS is far too concerned with its futile pursuit of curbing GHG emissions, which does not reflect the community's preferences. See, for example, the chart below which shows the importance of various factors to the Auckland community in relation to planning for more housing.[50]

Figure 7: Importance of Various Factors Relating to Planning for More Housing in Auckland



As we can see above, "infrastructure that can cope" mattered the most to Aucklanders when surveyed (in 2021/2022) about the things that matter most in terms of planning for more housing.

[50] IPI Overall Evaluation Section 32 report, page 284

We expect that infrastructure adequacy will be an even greater concern now following the devastating effects of the anniversary weekend floods coupled with Cyclone Gabrielle. Together, these events revealed massive vulnerabilities in the three waters network and highlighted the risk of excessive intensification (i.e. creating too much impervious surface area in concentrated locations).

In our view, the FDS does not properly reflect the factors that matter most to Aucklanders in terms of new housing opportunities. This is exacerbated by a seeming over-reliance on capacity unlocked by PC78, most of which reflects intensification, and almost all of which[51] is only for one housing typology (attached). This limited range of choice is unlikely to best meet the needs of Aucklanders over time, so it is critical that the FUZ is maintained as much as possible to provide housing choice and boost competition in the region's urban land market(s).

[51] According to PC78 documentation, 96% of plan-enabled residential capacity is for terraces or apartments.

8. Deriving the FDS from the MCA

8.1 Introduction

Finally, the methodology used to translate the options analysis into the FDS' preferred scenario (i.e. its composite scenario) is unclear. Rather than selecting the best-performing option from the MCA, the FDS creates a new, hybrid option from the results that lacks any meaningful detail. This, in turn, obscures the details of the implied new strategic direction, and its rationale. This is a concern, and not just for transparency reasons, as briefly explained below.

8.2 Impacts of Negative Scores

The MCA adopted a seven-point scoring scale, ranging from -3 to 3, with negative scores reflecting bad outcomes, and positive scores good outcomes. While that's fine, the GSER makes the following critical acknowledgement about the implications of negative scores in its assessment, which is not captured in the overall narrative of the report:[52]

> *"In most cases, a negative score indicates the need for a specific policy intervention in addition to, or even instead of, land use or transport interventions alone."*

The table below shows the MCA scores, with red text indicating negative ones. Clearly, there are a lot of negative scores.

Table 6: MCA Scores (Red Values = Negative)

Criteria Themes	MCA Criteria (paraphrased)	A	B	C	D
Natural hazards & climate change	The extent of development areas in 100-year floodplains (greenfields)	-1	-1	-2	-3
	The extent of development areas in 100-year floodplains (brownfields)	-1	-3	-2	-2
Travel & Access	The extent to which scenarios impact carbon emissions	-1	-2	-2	-3
Environment	Scope to improve the health of natural wetlands (greenfields)	1	1	2	2
	Scope to improve the health of natural wetlands (brownfields)	-1	-1	-2	-2
	Impacts on ability to swim safely and collect shellfish	-1	-1	-2	-3
	Promotion of the restoration/connectivity of indigenous biodiversity	-1	-1	-1	-2
Economy	The degree to which urban development consumes highly productive soils	-1	-1	-2	-3
Social, Cultural, and Heritage	Retention of the qualities of historic heritage places and values	-2	-1	-1	0
	Likely result on levels of access to quality open space	2	1	1	-1
Travel & Access	Extent to which population is exposed to harmful air emissions	3	2	1	1
Land & Housing	Extent to which growth creates greater housing choice to meet demand	1	1	1	0
Travel & Access	Promoting mixed use communities to reduce travel distances & safety risks	2	1	1	-1
	Providing inclusive/equitable access to social infrastructure & public spaces	1	1	-1	-2
	Accessibility of social infrastructure & employment in highly deprived areas	-2	-3	-3	-3
Māori	Extent of Māori land within growth areas	1	1	1	2
	Extent to which scenarios impact on Māori cultural landscapes	-2	-1	-1	-3
Travel & Access	Accessibility of key areas of economic activity by PT + active modes	3	3	2	1
	Education is accessible by different modes (PT + Active)	3	2	1	2

[52] GSER, page 7.

Criteria Themes	MCA Criteria (paraphrased)	A	B	C	D
	Employment opportunities are aligned with areas of population growth	3	2	2	1
	Household living cost reductions from proximity to employment areas	3	2	1	1
	Rural production areas are accessible	-1	-2	-2	-2
	Travel times are reliable	-1	-2	-2	-2
Economy	Opportunities for agglomeration of similar/dependent industries	3	1	1	-1
Land & Housing	Suitable land is available for Group 1 (land extensive) industries	-2	-3	-2	-2
Infrastructure	Scenarios support current committed infrastructure	1	2	3	-2
	The scenarios result in measurable public monetary costs or losses	2	1	-1	-3
Land & Housing	Physical constraints increase the cost of development	-1	-2	-2	-3
	The market is likely to respond to the proposed land use pattern	1	1	-1	-2

In truth, more than half (56%) of all MCA scores are negative. Even the utopian scenario A scored negatively on 14 of the 29 criteria (48%). Table 7 summarises the situation by (our suggested) criteria theme. The widespread dominance of negative scores highlights the FDS' limited ability to affect meaningful change according to its own reporting.

Table 7: Share of Negative, Positive, and Neutral Scores by Theme

Criteria Themes	Negative Scores	Neutral Scores	Positive Scores
Travel impacts/accessibility	43%	0%	57%
Environment	75%	0%	25%
Land & Housing Markets	63%	6%	31%
Social, Cultural, and Heritage	50%	13%	38%
Economy	63%	0%	38%
Infrastructure	38%	0%	63%
Māori	50%	0%	50%
Natural hazards & climate adaptation	100%	0%	0%
All Themes	**56%**	**2%**	**42%**

8.3 Consideration of Infrastructure Implications

Infrastructure is a major technical and financial challenge for all Councils, especially in growing areas like Auckland. However, the GSER has only two criteria on infrastructure, which belies its vital importance in helping redefine the region's growth strategy. The scores for those two infrastructure criteria are reproduced below.

Table 8: Scenario Scores for Infrastructure Criteria

Criteria Themes	MCA Criteria (some paraphrased)	A	B	C	D
Infrastructure	Extent to which scenarios support current committed infrastructure	1	2	3	-2
	The extent to which scenarios result in measurable public monetary costs or losses over time	2	1	-1	-3

Table 8 shows that Scenario C, which is the closest match to the status quo, rightfully scored best on the first criterion because it most closely aligns with the agreed development trajectory and hence current growth-related infrastructure programme. But, Scenario C performed poorly on the second

criterion (the extent to which it could result in measurable public monetary costs or losses). Overall, the GSER concludes that:[53]

> *"More intensive compact urban forms perform better in terms of the least monetary cost of infrastructure over time, as they result in more efficient use of existing services and new infrastructure. More expansive urban forms require the greatest amount of new infrastructure with the highest costs."*

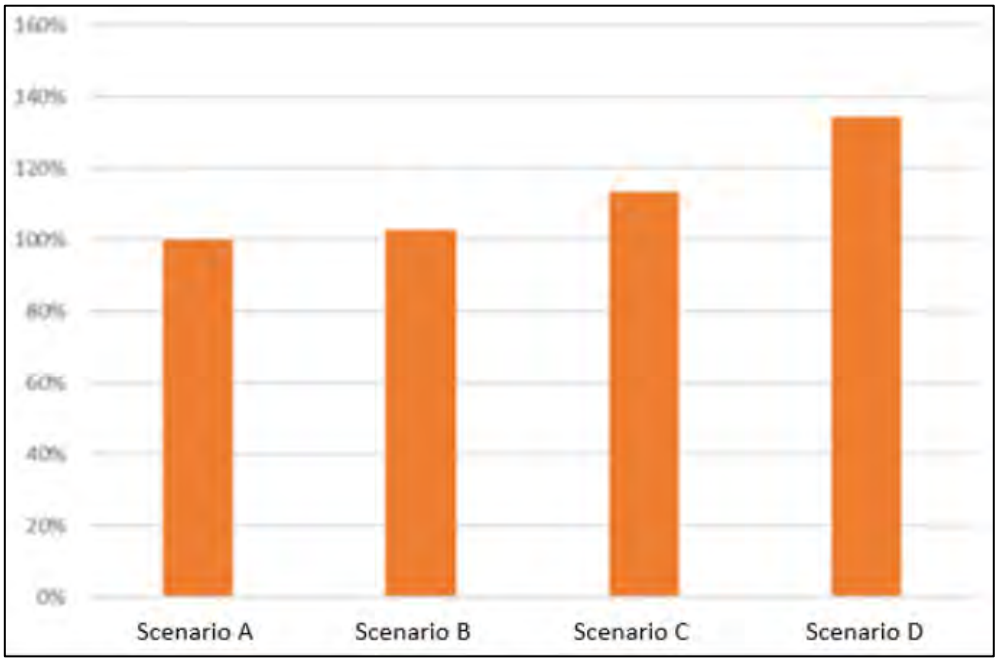
We challenge this conclusion on several grounds. First, the process used to quantify the infrastructure costs of each option are not explained. According to the GSER, infrastructure criteria were evaluated via subject matter expert input, which seems wholly inadequate given the cost and importance of infrastructure implications arising from the FDS.

Second, the cost of providing most growth-related infrastructure is recovered directly from developers via development contributions, private developer agreements, and developer self-provision. Accordingly, the reference to public monetary costs in the second criterion is misleading.

Third, the cost of (eventually) upgrading infrastructure networks in some existing urban areas could also be prohibitively expensive and/or cause unacceptable levels of disruption. This risk is particularly acute for the widespread, uncontrollable, and unpredictable growth enabled by PC78, which Scenarios A & B both rely heavily on, but the MCA scores wrongly signal otherwise.

Fourth, notwithstanding all the above, the "modelled" differences in infrastructure cost across options is much less than the scores, commentary, and conclusions suggest. This is shown in the screenshot below from page 55 of the GSER.

Figure 8: Relative Cost of Infrastructure to Service Expected Growth



[53] GSER, page 9.

To our eyes, it appears that Scenario C's infrastructure costs are only about 15% more than the far-fetched Scenario A. This is relatively immaterial in the scheme of things, with most projects having contingency buffers that far exceed the implied differential in option infrastructure costs.

Given that developers bear virtually all growth-related infrastructure costs, not ratepayers, we consider the FDS's analysis of infrastructure implications to be deficient and highly unreliable. This raises serious concerns about the validity of relying so heavily on intensification to meet the region's future business and residential needs.

8.4 Aligning New Jobs with New Homes

As already noted, the FDS places significant emphasis on travel impacts and accessibility, including the relative locations of new jobs and new homes. It assumes that more intensive development of existing urban areas is best because it lets new homes reside near existing employment areas. In forming this view, the FSDS seems to overlook the reality that many existing employment areas are almost fully built-out, with only limited scope for growth.

This again highlights the risk of relying just on plan-enabled capacity measures. While there may be enormous theoretical potential via the redevelopment of existing employment areas, this is seldom financially viable, particularly compared to residential, so it will not occur *en masse*.

In short, The FDS' presumption of significant job growth in existing urban areas is unlikely in some areas. Accordingly, new business land *will* be required in and around the FUZ to keep pace with residential growth and to address historic and existing home/job balances in the region's greenfield areas. This is also recognised in the executive summary of the GSER, which states that:[54]

> *"Providing business land opportunities in future urban areas provides opportunities to balance employment and housing."*

We agree wholeheartedly, and even the FDS notes the capability of FUZ business land to help improve employment access and bolster travel outcomes, but the proposal to undertake wholesale investigations of large parts of the FUZ (partly on travel grounds) directly contradicts it.

In our view, key decisions about the region's likely future urban form deserve a far more rigorous and reliable evaluation of options before any tweaks to the existing direction can be identified. Afterall, even the MCA itself observed the following about spatially aligning new jobs and homes: [55]

> *"Across all scenarios the model favours greenfield areas with the most job growth in [the FUZ] in Rodney and then Franklin."*

[54] GSER, page 9.

[55] GSER, page 48.

#8130

ATTACHMENT C

TRANSPORT FEEDBACK ON THE DRAFT FUTURE DEVELOPMENT STRATEGY

18 JULY 2023

FLOW TRANSPORTATION SPECIALISTS

flow
TRANSPORTATION SPECIALISTS

#8130

18 July 2023

Aidan Donnelly
General Manager, Development
Fletcher Living
Private Bag 99922
Newmarket
AUCKLAND 1149

Dear Aidan

TRANSPORT FEEDBACK ON THE AUCKLAND FUTURE DEVELOPMENT STRATEGY

Flow has been asked by Fletcher Living to provide comments on the Draft Auckland Future Development Strategy (Draft AFDS), which was recently released by Auckland Council. The Draft AFDS is proposed to replace the Future Urban Land Supply Strategy 2017 (FULSS) and the Auckland Plan 2050 Development Strategy 2018. If adopted, the AFDS will form the basis of Auckland's long term strategic planning framework.

The AFDS seeks to place some rigor on future development when considering the challenges currently faced by Council, which relates to financial challenges (funding), developing in flood prone areas, and ensuring that Government (both local and central) obtain a return on major infrastructure investments.

1 SUMMARY OF OUR ASSESSMENT

Our assessment discusses the transport concerns with the AFDS, as it relates to the following:

- The AFDS proposes to delay Future Urban Zoned land that is earmarked for employment (in particular light industry), as assessed through Structure Plans. In doing so, the AFDS will make it challenging for established/establishing residential catchments located about the fringe of Auckland to align with the outcomes sought by the Transport Emissions Reduction Pathway (TERP). This is because by delaying the outer employment areas, the AFDS
    - puts greater reliance on others (eg Auckland Transport and public transport providers) to establish and operate viable public transport networks that get people to work at the time and with the reliability that they need
    - reduces the ability to travel by cycle, scooter, and walking to access nearby employment
    - decreases the opportunities for those living in adjacent residential areas to drive shorter distances to work, therefore reducing vehicle-kilometres travelled
    - increases economic and social inequities, by making people more reliant on travelling by car if public transport cannot provide a viable alternative.

- Appendix 8 of the ADFS proposes to delay land development, aligning development when the strategic infrastructure required to service the "full build-out" of development area is "likely to be implemented". This outcome gives no certainty to when land can be developed. While the assessment of plan changes under the existing framework can be improved, development controls and developer funded upgrades that mitigate transport effects can suitably be captured in the current planning framework and reflects that development of large Plan Change areas and associated upgrades can be sequenced and occur over a number of years, if not decades.
- There is no certainty as to the timeframes of the Transport Triggers set out in Appendix 6 of the AFDS, with a number of concerns relating to the triggers suggested. These concerns along with some commentary are set out below.

2 DELAYING LAND EARMARKED FOR EMPLOYMENT

2.1 AFDS Proposal

The AFDS proposes to delay/push back the timing of Future Urban Zoned land that, through Structure Plans is earmarked for employment (light industry) development. The areas which have been delayed are located where residential growth is currently occurring at a fast rate, as allowed through approved resource consents. Large areas where employment land is proposed to be delayed are set out in Table 1.

Table 1: Revised timing of employment land

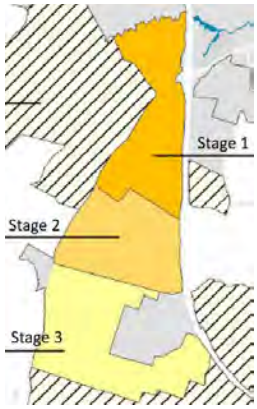
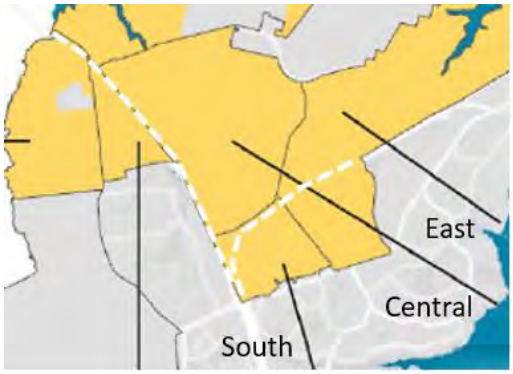
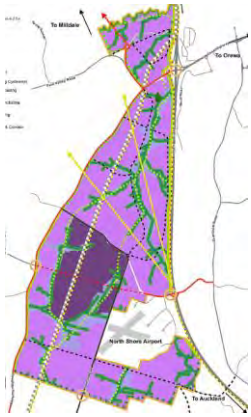
Area	Silverdale/North	Whenuapai/Northwest	Pukekohe/South
Location Map			
Structure Plan	Silverdale West Dairy Flat Industrial Area Structure Plan, April 2020	Whenuapai Structure Plan, September 2006	Pukekohe-Paerata Structure Plan 2019

Table 1: Revised timing of employment land

Area	Silverdale/North	Whenuapai/Northwest	Pukekohe/South
			
FULSS 2017 Timing	2018-2022	2018-2022 (East) 2028-2032 (Central)	2023-2027 (Pukekohe Southeast, Southwest)
AFDS Timing	2030+ (Stage 1) 2035+ (Stage 2) 2040+ (Stage 3)	2035+ 2050+ (Stg 2 North)	2035+ Pukekohe Southwest 2040+ Pukekohe Southeast
Proposed Jobs	9,000 Jobs (FULSS)	8,600 Jobs (WSP)	2,350 Jobs (PPSP)

2.2 Development of employment land

In recent history, the development of employment (light industry) land has taken 20+ years to be occupied, with recent examples including North Harbour Industrial Estate, Highbrook and The Landing at Auckland Airport. Each of these locations has relied on a suitable connection to the state highway network via an interchange, allowing the movement of road freight and vehicle-based employment related trips. Importantly, these areas have provided employment opportunities to the north, central and southern areas of Auckland. However, due to the lack of available light industrial land further afield, they are also employment hubs relied on by the wider population, with some having little or no support from suitable public transport.

The Auckland Transport Alignment Project (ATAP) report that underpins the transport investments included in the RLTP/AFDS highlights the *"significant unevenness to future employment accessibility and a growing polarisation of access to employment in the future. By 2046 more than a million people will be living in the western and southern parts of Auckland, nearly half the region's population. However these areas see relatively little improvement in their access to employment over time."*[1]

[1] https://www.transport.govt.nz/assets/Uploads/Report/ATAP-Evaluation-Report.pdf. Page 15

From a transport perspective, it is important to note that the traffic effects of a development area are not experienced from day one but are instead realised over time (20+ years). Recent development areas such as Drury South (Precinct I410) and Puhinui Precinct (I432) set out transport triggers and matters of discretion that need to be addressed to allow development to progress in an integrated manner, where effects are managed. While these frameworks can be improved, the intent of the provisions is to ensure integrated land use and transport network outcomes.

2.3 Travel behaviour

Residential growth enabled by the Metropolitan Urban Limit (MUL) and more recently, the Rural Urban Boundary (RUB) has increased population about Auckland's fringe. However, the development of employment land, and the provision of public transport networks, have not occurred at a similar pace, which in turn requires people to travel large distances to reach employment hubs.

We have assessed the travel behaviour of commuters about these outer areas (Whenuapai and Silverdale/Whangaparāoa) to better understand the destinations where people currently travel for work.

The 2018 Census commuting data (refer **Error! Reference source not found.**) shows that a large number of people commute to employment areas where light industrial activities are located, including

- North Harbour Industrial Estate
- Wairau Valley
- Penrose/Mt Wellington/Onehunga
- Henderson
- East Tamaki (Highbrook)
- Auckland Airport

The mode of travel for the majority of these trips will be by private car, as frequent and reliable public transport connectivity does not exist to all areas, noting also that many light industrial businesses include shift work which makes catching public transport less attractive due to off peak reliability and safety.

Figure 1: Commuter travel patterns (2018 Census)

North - Silverdale/Whangaparāoa	Northwest - Whenuapai/Hobsonville/Kumeu
	
Number of commuters to prominent light industrial employment areas – 3,800	Number of commuters to prominent light industrial employment areas – 2,300
Estimated annual private vehicle kilometers travelled (vkt) – 50 million	Estimated annual private vehicle kilometers travelled (vkt) – 20 million
Reduction in vkt if 15% work locally – 7 million vkt	Reduction in vkt if 15% work locally – 3 million vkt
Reduction in vkt if 30% work locally – 15 million vkt	Reduction in vkt if 30% work locally – 6 million vkt
Reduction in vkt if 45% work locally – 21 million vkt	Reduction in vkt if 45% work locally – 9 million vkt

Providing employment opportunities closer to the new residential areas established about Auckland's fringe (Whenuapai, Silverdale and Pukekohe) is a critical piece to achieving positive transport outcomes for the region, as it

- Reduces the reliance to travel across the region to access jobs, which are predominantly being accessed by private vehicle travel
- Locating employment opportunities about the residential growth areas will have a positive community effect, providing the ability to live, work and play about the same suburb, and substantially reduce vehicle kilometres travelled
- Allows more focussed public transport connections/routes to be established. Each area (Whenuapai, Silverdale and Pukekohe) has a nearby RTN station and therefore has the ability to extend or provide shorter and frequent local bus services between residential and employment areas as they develop

- Each area already has established connectivity to the state highway network, providing safe connectivity for road freight and vehicle-based employment related trips.

The AFDS ignores key accessibility challenges faced by Auckland growth areas as set out in the Auckland Transport Alignment Project Evaluation Report and does not contribute towards reducing vehicle kilometres travelled for those residential areas already established/establishing about the outer areas of the Region.

3 TRANSPORT TRIGGERS

The AFDS proposes to introduce infrastructure triggers at Appendix 6 that are required to be implemented prior to areas being development ready, with the proposed timings set out in Appendix 8.

The timing of areas being 'development ready' consider all infrastructure requirements. Our assessment has considered transport matters only, noting that other infrastructure (such as services) may be the primary purpose for the proposed delay. The number of transport triggers however is large and forms a significant obstacle in how land development can occur over time.

Transport projects listed for most part are those set out in the Regional Land Transport Plan (RLTP) which also tie back to the Auckland Transport Alignment Plan (ATAP). At Appendix 3 of the AFDS, it notes that two key transport documents are currently being finalised, being the Auckland Rapid Transit Plan (ARTP) and the Tāmaki Makaurau Integrated Transport Plan (TMTP). As such, projects and project timeframes are subject to change.

Issues with the AFDS transport triggers include

- It is proposed that Council will be stringently adhering to the infrastructure timeframes set out in the AFDS, however, the AFDS also allows timeframes to be reviewed. Using infrastructure upgrades such as Mill Road as an example, it is not reasonable to have development areas controlled by projects where funding may be redirected, be brought forward/pushed out or removed altogether, which can be based on decisions at a government political level, and therefore out of the control of Council
- The extent of several projects is significant, such as Mill Road, the North Shore Rapid Transit (extension to Milldale), North-west Rapid Transit and SH16-SH18 Connections. The AFDS does not give regard to how these upgrades may be staged, or how interim interventions put in place by the transport authorities may deliver or assist in delivering suitable short to medium term network improvements. For example,
    - a new Westgate bus station and improvements along SH16 for buses currently being implemented will improve public transport attractiveness and reliability for the North-west, such that the effect between the ultimate outcome (North-west Rapid Transit) and the interim outcome may be relatively minor (more resilient) when considering the timing of development
    - The recently completed Northern Corridor Improvements extends the Northern Busway to Albany and therefore assists with improving bus reliability for bus users to the North.

The provision of bus shoulder lanes in the future on SH1 to Silverdale, where limited interchange crossings exist would present a feasible, reliable and low cost alternative that benefits bus users, with improved frequencies for local service delivering a viable medium term solution. This approach is being applied to SH16, so would seem reasonable for SH1 North.

The above examples will help provide alternative travel options for the outer residential areas but may remain inadequate when providing attractive, efficient connectivity to key employment hubs located about the Auckland Region.

- Areas have been grouped (such as Riverhead with Kumeu and Huapai) and are therefore subject to wider area upgrades that do not necessarily impact on the safe and efficient accessibility of the area. That is, it is reasonable to tie development within Riverhead to the Brigham to Waimauku SH16 upgrade, but Riverhead should not be tied to the delivery of the Alternative State Highway (Kumeu Bypass) corridor or North-west Rapid Transit extension to Huapai which provides much needed transport improvements to the Kumeu-Huapai area, not Riverhead.
- The AFDS should not prohibit development where safe transport solutions can be addressed prior to the ultimate corridor upgrade being delivered.
- Corridor upgrades listed for areas do not only address transport (safety, active modes and capacity) but also include a significant amount of land and cost to improve stormwater improvements, for example, the Coatesville-Riverhead Highway upgrade. Long term connectivity opportunities exist for active modes when addressing corridor issues together, but cannot be achieved in isolation.
- As with current plan changes, safe, effective and efficient solutions are being delivered by private developers within the existing road reserve which address transport effects of private development. Therefore, it is unreasonable for the AFDS to tie the development of private land to transport upgrades, as private land requires third party land acquisition which only the regulatory authorities can acquire.

The logic of including strategic transport triggers to development areas which have a cost well in excess of what the Government (either locally or centrally) can progress is unreasonable. The assessment of Private Plan Changes could be improved, where development progressing prior to transport upgrades outlined in the RLTP need to demonstrate how the development will manage/control effects, such that the effects are mitigated.

The AFDS, while attempting to align the implementation of strategic transport infrastructure prior to development is not reasonable for the reasons outlined above. The current framework which includes placing land use and infrastructure upgrade triggers into planning provisions allows the opportunity for developers to progress (working with the road controlling authorities) transport upgrades which inevitably saves the roading authorities money.

4 CONCLUDING COMMENTS

An issue which exists with the delivery of transport networks, is having no easy mechanism to obtain targeted rates or contributions from land use development that can then contribute towards infrastructure that predominantly serves the area. Until a mechanism exists, the ongoing issue of ranking the region's transport priorities will always fall to where there is greater return on the investment.

Based on the current benefit framework, this is always going to direct investment where the greater demand/population exists and therefore starve investment the further out development is from the Isthmus.

The commuter travel patterns give two examples where a lot of traffic passes through Auckland. While efforts are being made to improve connectivity through active modes and public transport interventions, land use interventions also need to be part of the short to medium term solution. That is, ensuring employment opportunities exist where people live, ensuring schools (primary, secondary and tertiary), and community services such as libraries, medical centres, and hospitals exist so that cross city travel by private vehicle is minimised. We need a balanced approach to development, and land use plays a significant part of this. Rather than push certain growth areas out, we need to consider how balanced growth in areas helps achieve an efficient and feasible transport system, especially where there is currently an imbalance between residential, employment and community services in the outer areas of Auckland.

Should you wish to discuss any of the above further, please contact me on [redacted]

Yours sincerely

[redacted]

Future Development Plan 2023 #8133

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.

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?

Other

Tell us why
Please see attached.

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.

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.

Other feedback

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

Please see attached.

Future Development Plan 2023 #8134

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Your feedback

Focusing growth

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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

ARPHS has repeatedly supported Council's quality compact urban growth model, which has underpinned the development and implementation of the Auckland Plan 2050 and the Auckland Unitary Plan. By prioritising development within existing urban areas, Auckland can create vibrant, interconnected neighbourhoods that offer a range of amenities and services in close proximity. This approach promotes walkability, cycling, and efficient public transport networks, making it easier for residents to access essential services, workplaces, recreational spaces, and social connections. Quality compact development supports active lifestyles, reduces reliance on private vehicles, and encourages physical activity, thereby improving public health outcomes.

If done well, intensifying growth within existing urban areas can foster thriving communities that are socially inclusive and supportive of residents' well-being. It allows for the development of mixed-use spaces that integrate housing, employment opportunities, schools, ECE's, healthcare services, and playgrounds/sports fields. Increased land-use density and diversity are associated with significant health benefits, including major reductions in diabetes, cardiovascular disease and respiratory illness . Furthermore, this mixed-use approach can enhance social interaction, reduce social isolation, and promote mental health and overall community well-being. Creating safe and accessible public spaces, parks, and community gardens further strengthens community bonds, social cohesion, and residents' quality of life. Designing solutions to improve social cohesion is crucial in Aotearoa's current socio-political climate, with a recent report raising concerns about increasing threats to societal resilience.

With an aging population, focusing growth in existing urban areas becomes crucial for meeting the needs of older adults. By creating age-friendly communities, Auckland can provide accessible housing options, essential services, healthcare facilities, and social support networks within walking distance. This approach helps older adults maintain independence, social connections, and an active lifestyle, which are vital for healthy aging. Similarly, for tamariki and rangatahi, quality compact urban form can provide significant health benefits. Focussing growth in existing urban areas can support tamariki and rangatahi through easy access to education facilities and green spaces, environments that promote active mobility, improvements to road safety, and reductions in the inequitable health impacts of air pollution.

Whilst ARPHS are supportive of the overall model proposed by Council for quality compact urban growth, we propose that the FDS—and its supporting actions—can be strengthened in the following areas:

Food environments:

- Integrating food systems planning into urban growth strategies addresses the issue of food security. By supporting local food production, such as community gardens, urban farms, and markets, Tāmaki Makaurau can enhance access to fresh, healthy, locally sourced, and culturally significant foods that serve the needs of diverse communities. Higher deprivation communities are less likely to have access to fresh fruit and vegetables and are more likely to experience chronic health conditions such as diabetes4. New Zealand literature shows that community gardens contribute to community well-being by providing access to fruit and vegetables, increasing nutritional intake, reducing chronic health conditions, increasing physical activity, supporting financial well-being, improving environmental sustainability, revitalising culture and helping to develop a sense of community. ARPHS support Council's implementation action to:

"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"

However, to carry the statement through into meaningful action, and ensure an equitable approach, ARPHS recommend that Council change the wording to:

"Investigate and implement 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, prioritising areas of higher socioeconomic deprivation"

- ARPHS acknowledges that the FDS recognises food sovereignty as a goal for hapū and iwi in urban development. ARPHS suggests that the Council prioritise this objective through an action in the implementation plan dedicated to collaborating with mana whenua to allocate spaces for whānau to grow their own food. A stronger commitment to food sovereignty in urban planning can have several positive impacts on Māori health and well-being:

1. Improved access to nutritious and culturally significant foods.

2. Revitalisation of traditional knowledge and practices – farming, gardening, and harvesting practices. This helps preserve cultural knowledge and strengthens connections to ancestral traditions.

3. Increased community resilience and self-sufficiency. This can enhance their sense of autonomy and reduce dependence on external food sources.

4. Strengthened community connections and cohesion.

5. Economic opportunities and empowerment, by fostering entrepreneurship and economic self-determination.

- ARPHS also encourage Council to investigate ways to address issues of food sovereignty for other groups, including Pasifika, through allocating spaces for diverse communities to oversee the production of, and improve access to, culturally-significant foods.

Transportation:

- Greater emphasis and detail are required in the FDS around transit-oriented development, which integrates housing, businesses, and amenities within walking distance of rapid transport network stations. Ensuring concentrated development around the rapid transport network promotes walkability, reduces car dependency, and promotes health and well-being.

- To better enable Council to achieve the 2030 and 2035 transport emission reduction targets, ARPHS recommend introducing emission targets to the Auckland Unitary Plan. Achieving these reductions will provide significant health and environmental benefits, including improved air quality, reduced noise pollution, and increased physical activity levels.

Housing:

- Include in the supporting actions the use of financial incentives such as tax breaks, grants, or subsidies to encourage development of affordable, high-density, quality housing around existing and planned rapid transport corridors and near local centres within existing urban areas.

- ARPHS recommend that Council reduce restrictive zoning (including special character provisions) in areas surrounding the city centre to improve access to the amenities that these areas enjoy and increase city-wide housing stock. In the context of the FDS, these areas should be included as spatial priority areas for the next 1-10 years.

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

'ARPHS strongly support Council's focus on creating mixed-use, compact, quality localities. Focusing housing and business development near local centres, supporting mixed localities, and promoting multi-modal transport options brings significant public health benefits. By concentrating development near local centres, communities become more resilient and connected, with easy access to workplaces, services, facilities, and shops. This proximity encourages walking, cycling, and the use of public transport, reducing travel time, transport emissions, and household transport costs. It also creates vibrant, active communities that prioritise health and well-being, with reduced air pollution-related health risks, improved road safety, increased physical activity, and enhanced mental health and social connections.

Amongst these benefits, reductions in air pollution-related health risks would be particularly important in the Auckland context. In 2016, over half of all Aucklanders (59.4%) were exposed to levels of nitrogen dioxide (NO2) higher than the current World Health Organization's Air Quality Guidelines, with higher rates for Pacific Peoples (74.5%) . These exposure levels were overwhelmingly from vehicle emissions. This is estimated to have caused 685 premature deaths and 3,504 respiratory and cardiovascular hospitalisations in Tāmaki Makaurau, alongside 6,144 new cases of asthma among children. The annual social costs are $3.2 billion from both the direct hospital costs and restricted activity days where people could not work. There are also significant additional costs from PM2.5 emissions from vehicles. Prioritising compact urban form and mode shift away from cars is crucial to protecting Aucklanders from the ongoing health impacts of air pollution.

Whilst ARPHS are supportive of the overall model proposed by Council for quality compact urban growth, we propose that the FDS—and its supporting actions—can be strengthened in the following areas:

- Prioritise investment in public amenities, and business and transport infrastructure in areas of higher socioeconomic deprivation.

- Consider the role of policies and bylaws in shaping localities and acknowledge this within the FDS. For example, local access to fast food and alcohol has significant impacts on the health of communities. Considering updating policies and bylaws should not be neglected in lieu of an exclusive focus on infrastructure provisions.

- Set a more specific vision for how community well-being can be promoted through local urban planning and design. By highlighting healthy planning principles at the strategic level, the FDS can fully acknowledge the multi-faceted role of localities in supporting social, economic, cultural, and environmental well-being and recognise this as a priority in urban growth. This acknowledgement can also provide an important linkage between the FDS and the Auckland Plan 2050; in particular, by identifying spatial planning's role in supporting the outcomes of 'Belonging and Participation', 'Māori identity and Wellbeing', 'Homes and Places', and 'Transport and Access'. Some considerations include:

- Accessible urban green spaces, blue spaces, and other shared outdoor facilities are essential features in promoting mental health, physical activity, social cohesion, and environmental well-being. To maximise their benefits, these facilities should be co-located near other facilities such as schools.

- Inclusive design is crucial to meet the needs of diverse groups rather than a ‘baseline’ majority. Designing inclusive cities can promote health, reduce discrimination, increase social cohesion, and prevent isolation. To achieve inclusive local centres, the following must be considered:

1. Design aspects to increase feelings of safety for women, gender minorities, and other vulnerable-feeling users of the public realm, as well as design to enable people with sensory, physical, and cognitive limitations to move safely and independently. These may include enhanced wayfinding markers, good lighting, and accessible public toilets for all genders.

2. Diverse representations to increase sense of belongingness, such as facilities and street features that reflect the values and cultures of different communities. This includes the representation of mana whenua histories and presence in design.

3. Homeless person-inclusive design including water and sanitation facilities, charging stations, places to rest/sleep, harm reduction facilities.

4. Transport infrastructure, including cycleway routes, that attend to the needs of diverse groups, including full-time parents/caregivers who require ease of access to schools, local facilities, and parks.

5. A commitment to co-design and participative place making that engages the community in all its diversity at every step of urban planning and design.

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

ARPHS support Council’s approach to climate change adaptation efforts in existing urban areas. Most notably, we support the criteria for prioritising locations based on population density and NZDep score.
From a public health perspective, it is essential to prioritise areas of higher deprivation when considering natural hazard risks and adapting to climate change. These communities frequently experience significant health disparities, are less financially resilient, and bear a disproportionate burden from climate-related hazards. To promote equity, it is essential to empower Māori,

Pasifika, and other diverse communities in decision-making processes. In this way, their needs can be addressed and knowledges and innovation promoted in designing solutions.

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

ARPHS support the prioritisation of resilient, nature-based, regenerative, and mauri-enhancing infrastructure.

By embracing the concept of biophilic cities, infrastructure can go beyond climate mitigation and adaptation to also promote well-being and co-benefits. Biophilic cities emphasise the integration of nature into urban environments, fostering a connection with the natural world and enhancing the overall wellbeing of residents. These well-being benefits include improved cognitive health, a higher sense of social cohesion, increased emotional well-being, and improved physical health . In particular, increasing urban tree canopy cover, especially in areas where this is already limited, is an important public health intervention, and has been shown to reduce excess summer deaths from heat and mitigate the effects of air pollution.

Building strong basic infrastructure is also crucial to support increased housing density and cope with the impacts of climate change. ARPHS have a broad role in environmental health across Tāmaki Makaurau, with particular interests in safe drinking water, safe fresh and ocean recreational water (through limiting discharge of wastewater and other contaminants), limiting the spread of environment-derived pathogens (e.g., giardia/cryptosporidium) and vectors (e.g., invasive mosquito species), and avoiding urban heat island effects. All of these outcomes are benefitted by resilient, nature-based infrastructure that avoids flooding/pooling and separates contaminated water from that which humans come into contact with.

To achieve equitable outcomes, transparent decision-making processes are crucial in infrastructure investment and design. Engaging with diverse stakeholders, including Māori, Pasifika, and marginalised communities is vital to gain a comprehensive understanding of their perspectives. In this way, their needs can be addressed and knowledges and innovation promoted in designing solutions.

Other feedback

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

- The FDS Strategic Spatial Framework does not currently reflect the centrality of promoting health and well-being to achieving the best outcomes for Tāmaki Makaurau. Urban planning and development are critical enablers of health and well-being, and a platform through which major health risks can be alleviated through changes to our social and physical environments. The UN-Habitat and the World Health Organization assert that: "If the purpose of planning is not for human and planetary health, then what is it for?". To reflect the essentiality of a health and wellbeing lens to urban development, and to link the FDS to the outcomes identified in the Auckland Plan 2050, ARPHS recommend that Council:

1. Include in the section 'Principles for Growth and Change' a principle dedicated to health and well-being outcomes. This will give a stronger foundation for considering the broader aspects of population well-being within urban planning and anchor the strategy back in its primary purpose—to achieve the best outcomes for Tāmaki Makaurau. Section 3 (the Purpose) of the Natural and Built Environments Bill provides a useful precedent for including such considerations in planning documents.

2. Provide a clearer definition of 'well-being' and its relationship to urban planning at the regional and local levels within the proposed principle. This definition should be guided by the Auckland Plan 2050 and the Local Government (Community Well-being) Amendment Act 2019, which states that the purpose of local government is "to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future". The intergenerational aspect of this purpose should also be incorporated in the proposed principle. Finally, incorporating health and safety considerations will help Council to give effect to Section 7(1) of the Natural and Built Environment Bill.

- The FDS does not include a clear definition of equity, nor does it present supporting actions that clearly demonstrate Council's commitment to achieving equitable outcomes. Nuanced definitions of equity extend beyond socioeconomic outcomes to integrate concepts of accessibility and mobility, affordable housing, and social and cultural integration. By identifying and applying a comprehensive equity framework, the FDS can better address the needs of diverse communities, including Māori, Pasifika, women, disabled people, gender minorities, ethnic minorities, older adults, and people experiencing homelessness. As such, ARPHS recommend the following:

1. Provide a clear and comprehensive definition for equity within the spatial outcome 'Disparities in our communities and investments are addressed'.

2. Strengthen the supporting actions of the FDS to reflect Council's commitment to achieving equitable growth.

3. Consider how targeted spatial planning and development will alleviate existing inequities across Tāmaki Makaurau, rather than just preventing a further widening of disparities from a current 'baseline'.

- ARPHS is encouraged by the Council's acknowledgement of both Te Tiriti o Waitangi and the significance of hapū and iwi values in guiding urban growth and development. There is significant opportunity for the Council to further demonstrate their commitment to these values and Te Tiriti by strengthening their actions of support.

For instance, while spatial response discusses promoting Māori well-being primarily in relation to rural Māori land development, it is less clear how the Council plans to honour hapū and iwi values and aspirations in the growth of urban areas. The strategy also does not fully recognise the heterogeneity of Māori in the Auckland region, focussing solely on hapū and iwi, and not identifying how Council seek to understand and respond to the needs of mātāwaka in urban growth planning. Additionally, although the FDS recognises housing affordability as a barrier to Māori thriving in Auckland, there is a lack of clarity on the Council's intended approach to addressing this barrier, particularly in urban areas.

Furthermore, the FDS acknowledges the importance of incorporating mana whenua histories and presence into urban development through "sensitive and appropriate design, art and names". To fulfil this aspiration of hapū and iwi, promote Māori cultural and spiritual well-being, and uphold Te Tiriti, ARPHS recommends including a relevant supporting action within the FDS. This action should align with the 'Māori identity and well-being' outcome in the Auckland Plan 2050 and identify the mechanisms and strategies that the Council can employ to preserve and celebrate Māori sites, incorporate mana whenua mātauranga and Māori design, art, and names in both public and private development projects.

- The FDS does not give great enough attention to the inter-connected issues of housing affordability, accessibility, and quality, and their impacts on health inequities, nor does it clearly identify the levers available at the local government level to address these problems. ARPHS would like to see greater attention given to the following areas:

1. Housing quality – Access to affordable quality housing is a fundamental human right and a key social determinant of health. A study analysing data from 2010¬¬-2017 estimated that illnesses attributable to unsafe and substandard housing in Aotearoa result in $141 million of direct costs to the public sector annually. Furthermore, the study estimated 229 deaths attributable to these conditions annually, resulting in a cost to society of $1 billion . These substandard conditions are particularly concentrated in the Auckland region and are likely to have worsened in recent years due to a range of economic and social drivers. The provision of safe, quality housing must be a paramount concern in future development.

2. Accommodating larger households – Māori and Pasifika families/whānau are larger as compared to the general population. Multi-generational living is common for Pasifika, in particular, and is an important component of family and cultural well-being. Despite this, access to affordable, quality homes that meet the needs of larger families and whānau is a persistent issue in Tāmaki Makaurau, and a significant driver of health inequities. According to 2018 Census data, 44% of Pasifika and 25% of Māori in Tāmaki Makaurau were living in overcrowded homes. This was

compared to 15% of the general population. Household overcrowding carries significant health impacts, especially for children, including an increased risk of pneumonia, heart disease, exposure to infectious diseases, and mental health issues. Tāmaki Makaurau must grow in a way that not only delivers a higher volume of affordable housing, but accommodates the diverse needs of the population, including the demand for larger dwellings within urban centres.

- ARPHS recommend that Council develop and publish a framework and plan for monitoring and evaluating implementation of the FDS. Transparent and ongoing monitoring will be key for tracking the impacts and guiding future decision-making around urban development policies, projects, and programmes in Tāmaki Makaurau.

- It is critical that Council continues to partner with the relevant government agencies to support the implementation of the FDS.

- Please refer to the attached file for a complete version of ARPHS' response to the Future Development Strategy, including references and relevant contact details.

Auckland Regional Public Health Service
Ratonga Hauora-ā-Iwi ō Tāmaki Makaurau

#8134

Te Whatu Ora
Health New Zealand

31 July 2023

Auckland Council
akhaveyoursay@aucklandcouncil.govt.nz

Submission on the *Future Development Strategy*

Thank you for the opportunity for the National Public Health Service, Te Whatu Ora to provide a submission on Auckland Council's Future Development Strategy. This submission has been written by the Auckland Service (ARPHS). Please refer to Appendix 1 for more information on ARPHS.

We welcome an opportunity to meet with you to discuss our submission.

The primary contact point for this submission is:

[redacted]

Ngā mihi/Yours sincerely,

[redacted]

Auckland Regional Public Health Service
Ratonga Hauora-ā-Iwi ō Tāmaki Makaurau
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1. Overview

Thank you for the opportunity to comment on the Auckland Council Future Development Strategy (FDS).

The strategic direction for Tāmaki Makaurau's growth and development is of great importance in determining the future well-being of all those living in Aotearoa New Zealand's largest urban centre. ARPHS acknowledge the significant complexities faced by Auckland Council (Council) in planning for growth in a region facing significant social, economic, and environmental pressures and uncertainties. We commend Council's commitment to navigating these challenges to deliver the best outcomes for Tāmaki Makaurau.

As a public health organisation, we care about the social determinants of health and the ways in which our built and natural environments shape the health and well-being of our population. Tāmaki Makaurau faces a number of social and health challenges influenced by these environments in which residents live, work, and play. Some of these challenges include entrenched spatial, economic, social, and health inequities; the impacts of breaches of Te Tiriti o Waitangi on Māori health and well-being; low availability and affordability of quality housing; the need to mitigate and adapt to climate change; air pollution; road traffic injuries; interpersonal violence; unhealthy food environments; and declining social cohesion.

Urban planning and development are critical enablers of health and well-being, and a platform through which major health risks can be alleviated through changes to our social and physical environments. As framed by UN-Habitat and the World Health Organization:

"If the purpose of planning is not for human and planetary health, then what is it for?"[1]

This starts at the level of a development strategy, which lays the foundation for the principles and patterns of urban growth. As such, the FDS lends a pivotal opportunity for Council to be leaders and innovators in shaping an equitable and prosperous Tāmaki Makaurau through transformational change.

Overall, ARPHS supports the principles and actions contained within the FDS, particularly in relation to facilitating quality compact growth within the existing urban area. To work towards a future in which all Aucklanders thrive, ARPHS outlines areas of the FDS that can be strengthened in the enclosed consultation response.

[1] UN-Habitat and World Health Organization (2020): Integrating health in urban and territorial planning: A sourcebook. Retrieved from: https://www.who.int/publications/i/item/9789240003170

2. Response to Consultation Questions

2.1 Focussing growth

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

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.

ARPHS has repeatedly supported Council's quality compact urban growth model, which has underpinned the development and implementation of the Auckland Plan 2050 and the Auckland Unitary Plan. By prioritising development within existing urban areas, Auckland can create vibrant, interconnected neighbourhoods that offer a range of amenities and services in close proximity. This approach promotes walkability, cycling, and efficient public transport networks, making it easier for residents to access essential services, workplaces, recreational spaces, and social connections. Quality compact development supports active lifestyles, reduces reliance on private vehicles, and encourages physical activity, thereby improving public health outcomes.

If done well, intensifying growth within existing urban areas can foster thriving communities that are socially inclusive and supportive of residents' well-being. It allows for the development of mixed-use spaces that integrate housing, employment opportunities, schools, ECE's, healthcare services, and playgrounds/sports fields. Increased land-use density and diversity are associated with significant health benefits, including major reductions in diabetes, cardiovascular disease and respiratory illness[2]. Furthermore, this mixed-use approach can enhance social interaction, reduce social isolation, and promote mental health and overall community well-being. Creating safe and accessible public spaces, parks, and community gardens further strengthens community bonds, social cohesion, and residents' quality of life. Designing solutions to improve social cohesion is crucial in Aotearoa's current socio-political climate, with a recent report raising concerns about increasing threats to societal resilience [3].

With an aging population, focusing growth in existing urban areas becomes crucial for meeting the needs of older adults. By creating age-friendly communities, Auckland can provide accessible housing options, essential services, healthcare facilities, and social support networks within walking distance. This approach helps older adults maintain independence, social connections, and an active lifestyle, which are vital for healthy aging. Similarly, for tamariki and

[2] Stevenson M, Thompson J, de Sá TH, Ewing R, Mohan D, McClure R, Roberts I, Tiwari G, Giles-Corti B, Sun X, Wallace M. Land use, transport, and population health: estimating the health benefits of compact cities. The lancet. 2016 Dec 10;388(10062):2925-35.
[3] Gluckman, P., Spoonley, P., Bardsley, A., Poulton, R., Te Ahukaramū Charles Royal, H. S., & Clyne, D. (2023). Addressing the challenges to social cohesion.

rangatahi, quality compact urban form can provide significant health benefits. Focussing growth in existing urban areas can support tamariki and rangatahi through easy access to education facilities and green spaces, environments that promote active mobility, improvements to road safety, and reductions in the inequitable health impacts of air pollution.

Whilst ARPHS are supportive of the overall model proposed by Council for quality compact urban growth, we propose that the FDS—and its supporting actions—can be strengthened in the following areas:

Food environments

- Integrating food systems planning into urban growth strategies addresses the issue of food security. By supporting local food production, such as community gardens, urban farms, and markets, Tāmaki Makaurau can enhance access to fresh, healthy, locally sourced, and culturally significant foods that serve the needs of diverse communities. Higher deprivation communities are less likely to have access to fresh fruit and vegetables and are more likely to experience chronic health conditions such as diabetes[4]. New Zealand literature shows that community gardens contribute to community well-being by providing access to fruit and vegetables, increasing nutritional intake, reducing chronic health conditions, increasing physical activity, supporting financial well-being, improving environmental sustainability, revitalising culture and helping to develop a sense of community[4, 5, 6, 7]. ARPHS support Council's implementation action to:

  "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"

  However, to carry the statement through into meaningful action, and ensure an equitable approach, ARPHS recommend that Council change the wording to:

  "Investigate <u>and implement</u> 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, *<u>prioritising areas of higher socioeconomic deprivation</u>"*

- ARPHS acknowledges that the FDS recognises food sovereignty as a goal for hapū and iwi in urban development. ARPHS suggests that the Council prioritise this objective through an action in the implementation plan dedicated to collaborating with mana whenua to allocate spaces for whānau to grow their own food. A stronger commitment to food sovereignty in urban planning can have several positive impacts on Māori health and well-being:
  1. Improved access to nutritious and culturally significant foods.

[4] Earle, M. D. (2011). Cultivating health: Community gardening as a public health intervention (Doctoral dissertation, University of Otago).
[5] Bowers, S., Carter, K., Gorton, D., Heta, C., Lanumata, T., Maddison, R., ... & Walton, M. (2009). Enhancing food security and physical activity for Māori, Pacific and low-income peoples. August 2009. Wellington: Clinical Trials Research Unit, University of Auckland; GeoHealth Laboratory, University of Canterbury. Health Promotion and Policy Research Unit, University of Otago
[6] Hond, R., Ratima, M., & Edwards, W. (2019). The role of Māori community gardens in health promotion: a land-based community development response by Tangata Whenua, people of their land. *Global Health Promotion*, *26*(3_suppl), 44-53.
[7] Heerink, S., Sinclair-Phillips, V., Jagger, A., & Hay, K. (2021). Expanding field education: Hope trust community garden. Aotearoa New Zealand Social Work, 33(1), 112-115.

2. Revitalisation of traditional knowledge and practices – farming, gardening, and harvesting practices. This helps preserve cultural knowledge and strengthens connections to ancestral traditions.
3. Increased community resilience and self-sufficiency. This can enhance their sense of autonomy and reduce dependence on external food sources.
4. Strengthened community connections and cohesion.
5. Economic opportunities and empowerment, by fostering entrepreneurship and economic self-determination.

- ARPHS also encourage Council to investigate ways to address issues of food sovereignty for other groups, including Pasifika, through allocating spaces for diverse communities to oversee the production of, and improve access to, culturally-significant foods.

Transportation

- Greater emphasis and detail are required in the FDS around transit-oriented development, which integrates housing, businesses, and amenities within walking distance of rapid transport network stations. Ensuring concentrated development around the rapid transport network promotes walkability, reduces car dependency, and promotes health and well-being.
- To better enable Council to achieve the 2030 and 2035 transport emission reduction targets, ARPHS recommend introducing emission targets to the Auckland Unitary Plan. Achieving these reductions will provide significant health and environmental benefits, including improved air quality, reduced noise pollution, and increased physical activity levels.

Housing

- Include in the supporting actions the use of financial incentives such as tax breaks, grants, or subsidies to encourage development of affordable, high-density, quality housing around existing and planned rapid transport corridors and near local centres within existing urban areas.
- ARPHS recommend that Council reduce restrictive zoning (including special character provisions) in areas surrounding the city centre to improve access to the amenities that these areas enjoy and increase city-wide housing stock. In the context of the FDS, these areas should be included as spatial priority areas for the next 1-10 years.

2.2 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.

ARPHS strongly support Council's focus on creating mixed-use, compact, quality localities. Focusing housing and business development near local centres, supporting mixed localities, and promoting multi-modal transport options brings significant public health benefits. By concentrating development near local centres, communities become more resilient and connected, with easy access to workplaces, services, facilities, and shops. This proximity encourages walking, cycling, and the use of public transport, reducing travel time, transport emissions, and household transport costs. It also creates vibrant, active communities that prioritise health and well-being, with reduced air pollution-related health risks, improved road safety, increased physical activity, and enhanced mental health and social connections [8].

Amongst these benefits, reductions in air pollution-related health risks would be particularly important in the Auckland context. In 2016, over half of all Aucklanders (59.4%) were exposed to levels of nitrogen dioxide (NO_2) higher than the current World Health Organization's Air Quality Guidelines, with higher rates for Pacific Peoples (74.5%) [9]. These exposure levels were overwhelmingly from vehicle emissions. This is estimated to have caused 685 premature deaths and 3,504 respiratory and cardiovascular hospitalisations in Tāmaki Makaurau, alongside 6,144 new cases of asthma among children [9]. The annual social costs are $3.2 billion from both the direct hospital costs and restricted activity days where people could not work [9]. There are also significant additional costs from PM2.5 emissions from vehicles. Prioritising compact urban form and mode shift away from cars is crucial to protecting Aucklanders from the ongoing health impacts of air pollution.

Whilst ARPHS are supportive of the overall model proposed by Council for quality compact urban growth, we propose that the FDS—and its supporting actions—can be strengthened in the following areas:

- Prioritise investment in public amenities, and business and transport infrastructure in areas of higher socioeconomic deprivation.

[8] UN-Habitat and World Health Organization (2020). Integrating health in urban and territorial planning: A sourcebook. Retrieved from: https://www.who.int/publications/i/item/9789240003170

[9] Kuschel et al (2022). Health and air pollution in New Zealand 2016 (HAPINZ 3.0): Volume 1 – Finding and implications. (Report prepared by G Kuschel, J Metcalfe, S Sridhar, P Davy, K Hastings, K Mason, T Denne, J Berentson-Shaw, S Bell, S Hales, J Atkinson and A Woodward for Ministry for the Environment, Ministry of Health, Te Manatū Waka Ministry of Transport and Waka Kotahi NZ Transport Agency, March 2022). Ministry for the Environment

- Consider the role of policies and bylaws in shaping localities and acknowledge this within the FDS. For example, local access to fast food and alcohol has significant impacts on the health of communities. Considering updating policies and bylaws should not be neglected in lieu of an exclusive focus on infrastructure provisions.
- Set a more specific vision for how community well-being can be promoted through local urban planning and design. By highlighting healthy planning principles at the strategic level, the FDS can fully acknowledge the multi-faceted role of localities in supporting social, economic, cultural, and environmental well-being and recognise this as a priority in urban growth. This acknowledgement can also provide an important linkage between the FDS and the Auckland Plan 2050; in particular, by identifying spatial planning's role in supporting the outcomes of *'Belonging and Participation'*, *'Māori identity and Wellbeing'*, *'Homes and Places'*, and *'Transport and Access'*. Some considerations include:
    - Accessible urban green spaces, blue spaces, and other shared outdoor facilities are essential features in promoting mental health, physical activity, social cohesion, and environmental well-being. To maximise their benefits, these facilities should be co-located near other facilities such as schools.
    - Inclusive design is crucial to meet the needs of diverse groups rather than a 'baseline' majority. Designing inclusive cities can promote health, reduce discrimination, increase social cohesion, and prevent isolation. To achieve inclusive local centres, the following must be considered:
        - Design aspects to increase feelings of safety for women, gender minorities, and other vulnerable-feeling users of the public realm, as well as design to enable people with sensory, physical, and cognitive limitations to move safely and independently. These may include enhanced wayfinding markers, good lighting, and accessible public toilets for all genders.
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        - Homeless person-inclusive design including water and sanitation facilities, charging stations, places to rest/sleep, harm reduction facilities.
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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

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2.4 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.

ARPHS support the prioritisation of resilient, nature-based, regenerative, and mauri-enhancing infrastructure.

By embracing the concept of biophilic cities, infrastructure can go beyond climate mitigation and adaptation to also promote well-being and co-benefits. Biophilic cities emphasise the integration of nature into urban environments, fostering a connection with the natural world and enhancing the overall wellbeing of residents. These well-being benefits include improved cognitive health, a higher sense of social cohesion, increased emotional well-being, and improved physical

health[10]. In particular, increasing urban tree canopy cover, especially in areas where this is already limited, is an important public health intervention, and has been shown to reduce excess summer deaths from heat[11] and mitigate the effects of air pollution.[12]

Building strong basic infrastructure is also crucial to support increased housing density and cope with the impacts of climate change. ARPHS have a broad role in environmental health across Tāmaki Makaurau, with particular interests in safe drinking water, safe fresh and ocean recreational water (through limiting discharge of wastewater and other contaminants), limiting the spread of environment-derived pathogens (e.g., giardia/cryptosporidium) and vectors (e.g., invasive mosquito species), and avoiding urban heat island effects. All of these outcomes are benefitted by resilient, nature-based infrastructure that avoids flooding/pooling and separates contaminated water from that which humans come into contact with.

To achieve equitable outcomes, transparent decision-making processes are crucial in infrastructure investment and design. Engaging with diverse stakeholders, including Māori, Pasifika, and marginalised communities is vital to gain a comprehensive understanding of their perspectives. In this way, their needs can be addressed and knowledges and innovation promoted in designing solutions.

2.5 Other

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

- The FDS Strategic Spatial Framework does not currently reflect the centrality of promoting health and well-being to achieving the best outcomes for Tāmaki Makaurau. Urban planning and development are critical enablers of health and well-being, and a platform through which major health risks can be alleviated through changes to our social and physical environments. The UN-Habitat and the World Health Organization assert that: *"If the purpose of planning is not for human and planetary health, then what is it for?"* [13]. To reflect the essentiality of a health and wellbeing lens to urban development, and to link the FDS to the outcomes identified in the Auckland Plan 2050, ARPHS recommend that Council:
    - Include in the section '*Principles for Growth and Change'* a principle dedicated to health and well-being outcomes. This will give a stronger foundation for considering the broader aspects of population well-being within urban planning and anchor the strategy back in its primary purpose—to achieve the best outcomes for Tāmaki Makaurau. Section 3 (the Purpose) of the Natural and

[10] Wet, N (2018). Biophilic Public Health: Re-imagining Public Health for the 21st Century. Retrieved from: https://toiteora.govt.nz/assets/Toi-Te-Ora-Public-Health/Publications-and-Resources/Medical-Officer-of-Health-Reports/20180529_MOH_CPHAC_Biophilic_Public_HealthFINAL.pdf
[11] Iungman T, Cirach M, Marando F, Barboza EP, Khomenko S, Masselot P, Qu jal-Zamorano M, Mueller N, Gasparrini A, Urquiza J, Heris M. Cooling cities through urban green infrastructure: a health impact assessment of European cities. The Lancet. 2023 Feb 18;401(10376):577-89.
[12] Nowak DJ, Crane DE, Stevens JC. Air pollution removal by urban trees and shrubs in the United States. Urban forestry & urban greening. 2006 Apr 3;4(3-4):115-23.
[13] UN-Habitat and World Health Organization (2020): Integrating health in urban and territorial planning: A sourcebook. Retrieved from: https://www.who.int/publications/i/item/9789240003170

Built Environments Bill provides a useful precedent for including such considerations in planning documents.

- Provide a clearer definition of 'well-being' and its relationship to urban planning at the regional and local levels within the proposed principle. This definition should be guided by the Auckland Plan 2050 and the Local Government (Community Well-being) Amendment Act 2019, which states that the purpose of local government is *"to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future*". The intergenerational aspect of this purpose should also be incorporated in the proposed principle. Finally, incorporating health and safety considerations will help Council to give effect to Section 7(1) of the Natural and Built Environment Bill.

- The FDS does not include a clear definition of equity, nor does it present supporting actions that clearly demonstrate Council's commitment to achieving equitable outcomes. Nuanced definitions of equity extend beyond socioeconomic outcomes to integrate concepts of accessibility and mobility, affordable housing, and social and cultural integration. By identifying and applying a comprehensive equity framework, the FDS can better address the needs of diverse communities, including Māori, Pasifika, women, disabled people, gender minorities, ethnic minorities, older adults, and people experiencing homelessness. As such, ARPHS recommend the following:
  - Provide a clear and comprehensive definition for equity within the spatial outcome *'Disparities in our communities and investments are addressed'.*
  - Strengthen the supporting actions of the FDS to reflect Council's commitment to achieving equitable growth.
  - Consider how targeted spatial planning and development will alleviate existing inequities across Tāmaki Makaurau, rather than just preventing a further widening of disparities from a current 'baseline'.

- ARPHS is encouraged by the Council's acknowledgement of both Te Tiriti o Waitangi and the significance of hapū and iwi values in guiding urban growth and development. There is significant opportunity for the Council to further demonstrate their commitment to these values and Te Tiriti by strengthening their actions of support.

  For instance, while spatial response discusses promoting Māori well-being primarily in relation to rural Māori land development, it is less clear how the Council plans to honour hapū and iwi values and aspirations in the growth of urban areas. The strategy also does not fully recognise the heterogeneity of Māori in the Auckland region, focussing solely on hapū and iwi, and not identifying how Council seek to understand and respond to the needs of mātāwaka in urban growth planning. Additionally, although the FDS recognises housing affordability as a barrier to Māori thriving in Auckland, there is a lack of clarity on the Council's intended approach to addressing this barrier, particularly in urban areas.

  Furthermore, the FDS acknowledges the importance of incorporating mana whenua histories and presence into urban development through *"sensitive and appropriate design, art and names"*. To fulfil this aspiration of hapū and iwi, promote Māori cultural and spiritual well-being, and uphold Te Tiriti, ARPHS recommends including a relevant

supporting action within the FDS. This action should align with the 'Māori identity and well-being' outcome in the Auckland Plan 2050 and identify the mechanisms and strategies that the Council can employ to preserve and celebrate Māori sites, incorporate mana whenua mātauranga and Māori design, art, and names in both public and private development projects.

- The FDS does not give great enough attention to the inter-connected issues of housing affordability, accessibility, and quality, and their impacts on health inequities, nor does it clearly identify the levers available at the local government level to address these problems. ARPHS would like to see greater attention given to the following areas:
    - Housing quality – Access to affordable quality housing is a fundamental human right and a key social determinant of health. A study analysing data from 2010-2017 estimated that illnesses attributable to unsafe and substandard housing in Aotearoa result in $141 million of direct costs to the public sector annually. Furthermore, the study estimated 229 deaths attributable to these conditions annually, resulting in a cost to society of $1 billion [14]. These substandard conditions are particularly concentrated in the Auckland region and are likely to have worsened in recent years due to a range of economic and social drivers. The provision of safe, quality housing must be a paramount concern in future development.
    - Accommodating larger households – Māori and Pasifika families/whānau are larger as compared to the general population. Multi-generational living is common for Pasifika, in particular, and is an important component of family and cultural well-being. Despite this, access to affordable, quality homes that meet the needs of larger families and whānau is a persistent issue in Tāmaki Makaurau, and a significant driver of health inequities. According to 2018 Census data, 44% of Pasifika and 25% of Māori in Tāmaki Makaurau were living in overcrowded homes. This was compared to 15% of the general population [15]. Household overcrowding carries significant health impacts, especially for children, including an increased risk of pneumonia, heart disease, exposure to infectious diseases, and mental health issues. Tāmaki Makaurau must grow in a way that not only delivers a higher volume of affordable housing, but accommodates the diverse needs of the population, including the demand for larger dwellings within urban centres.

- ARPHS recommend that Council develop and publish a framework and plan for monitoring and evaluating implementation of the FDS. Transparent and ongoing monitoring will be key for tracking the impacts and guiding future decision-making around urban development policies, projects, and programmes in Tāmaki Makaurau.

- It is critical that Council continues to partner with the relevant government agencies to support the implementation of the FDS.

[14] Riggs L, Keall M, Howden-Chapman P, Baker MG. Environmental burden of disease from unsafe and substandard housing, New Zealand, 2010-2017. Bull World Health Organ. 2021 Apr 1;99(4):259-270. doi: 10.2471/BLT.20.263285. Epub 2021 Feb 1. PMID: 33953443; PMCID: PMC8085632.

[15] https://www.stats.govt.nz/news/almost-1-in-9-people-live-in-a-crowded-house

3. Conclusion

Thank you for the opportunity for ARPHS to provide feedback on the Future Development Strategy.

Auckland Regional Public Health Service
Ratonga Hauora-ā-Iwi ō Tāmaki Makaurau
TeWhatuOra.govt.nz | arphs.health.nz
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Appendix 1 – Auckland Regional Public Health Service

Auckland Regional Public Health Service is part of the National Public Health Service (NPHS), Northern region. The NPHS began on July 1 2022 when a new national health service Te Whatu Ora was established under the Pae Ora (healthy future) legislation.

Public health services in Auckland work alongside whānau, iwi, communities and organisations to create and support healthier communities and to reduce or eliminate the cause and spread of infectious diseases. This also means collaborating with communities and those in other sectors to improve the wider determinants that affect people's health, like housing or transport.

Our staff includes medical officers of health, senior medical officers, Māori and Pasifika health experts and cultural advisors, health protection officers, public health nurses, health promoters and those in systems, intelligence and planning roles, and management. We fulfil a range of regulatory roles around alcohol licensing, smokefree compliance, infectious disease management and environmental health.

Future Development Plan 2023 #8135

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.

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?

Other

Tell us why
Please see attached.

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.

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.

Other feedback

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

Please see attached.

#8135

UNDER the Resource Management Act 1991

AND

IN THE MATTER of a submission by **FLETCHER RESIDENTIAL LIMITED** to **AUCKLAND COUNCIL** on the draft Auckland Future Development Strategy

SUBMISSION BY FLETCHER RESIDENTIAL LIMITED ON THE DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY

1. INTRODUCTION

1.1 This submission is made on behalf of Fletcher Residential Ltd ("FRL") on the Auckland draft Future Development Strategy ("Draft FDS").

1.2 FRL is the residential development and delivery arm of Fletcher Building. It is one of the largest developers of new residential communities in New Zealand, having built and sold thousands of homes over the last five years. FRL is committed to quality urban design centred on creating communities through the integration of housing, open spaces and community facilities, and the associated social and economic drivers that form successful neighbourhoods and communities.

1.3 Along with sourcing land from private vendors and developers, FRL partners with Iwi and Government for development and home-building projects, including affordable housing in conjunction with Kainga Ora. FRL currently has 17 developments in progress in Auckland, across all areas of the region, in both brownfield (e.g. Three Kings, Tamaki, Waiata Shores, Stonefields, Hobsonville Point) and greenfield (e.g. Whenuapai, Drury, Red Beach) areas, which when fully developed will provide for over 5,000 dwellings. FRL delivers a full mix of typologies, including apartments, townhouses, and standalone dwellings.

1.4 FRL is also a member of the Riverhead Landowners Group ("RLG") which has sought a private plan change to rezone 80.5 ha of land at Riverhead from Future Urban ("FUZ") to a range of residential zones ("the Riverhead South Plan Change") to enable the development of between 1500 and 1800 homes to be built.

1.5 FRL's extensive experience of land development in Auckland, and its ongoing involvement in the market means that it has detailed knowledge of the market and the factors that contribute to success.

Overview and scope of submission

1.6 Like other major developers who would have been able to provide Auckland Council ("Council" or "AC") with the information necessary to make informed decisions, FRL was not consulted in the preparation of the Draft FDS. The Council's failure to properly consult with the development community is immediately apparent from the document, which is replete with inaccurate assumptions and errors such that if implemented, it is

likely to have major unintended consequences for economic development, housing choice and affordability.

1.7 This submission addresses key errors and inaccuracies identified in the Draft FDS in relation to residential development. The matters identified in this submission should not be treated as exhaustive as the problems with the Draft FDS are extensive and could not all be captured in the limited submission time available.

1.8 FRL requests that the Draft FDS is withdrawn and preparation of a new FDS is commenced afresh. FRL remains willing to engage constructively with the Council to inform this work.

1.9 This submission addresses the following:

(a) The failure to comply with the requirements of the National Policy Statement on Urban Development ("NPS-UD") (Section 3);

(b) The approach in the Draft FDS to consideration of the spatial growth scenarios and intensification options (Section 4);

(c) The likely effects of the Draft FDS on housing affordability and choice (Section 5);

(d) The reasons for enabling greenfield development (Section 6);

(e) The proposed implementation measures (Section 7);

(f) The proposed rezoning and "investigation" of existing FUZ land (Section 8);

(g) The consultation process (Section 9); and

(h) Fletcher's conclusion and requests to the Council regarding the Draft FDS (Section 10).

1.10 A summary of this submission is contained in Section 2.

Separate submission by Fletcher Development Limited

1.11 A separate submission has been lodged by Fletcher Development Limited ("FDL") in relation to the likely effects of the Draft FDS on capacity and demand for business land. These two submissions have been prepared together and raise some of the same issues. In order to ensure that they can each be read as standalone documents, there is some duplication across the two submissions.

Supporting technical reports

1.12 FRL's expert team has undertaken a detailed technical analysis of the Draft FDS. This submission has been informed by the following technical reports, which are appended to this submission:

(a) *Analysis of the Auckland Council Draft Future Development Strategy 2023: Impact on the Provision of Land for Residential Report to Fletcher Living* Tattico Limited **(Attachment A)**;

(b) *Economic Review of Auckland Council's Draft Future Development Strategy (FDS)* Insight Economics **(Attachment B)**; and

(c) *Transport Feedback on the Draft Future Development Strategy* Flow Transportation Specialists **(Attachment C)**.

2. SUMMARY

2.1 The Draft FDS is fundamentally flawed. It fails to give effect to the requirements of the NPS-UD and, if implemented, will have major negative consequences for land values, housing affordability and the health of Auckland's economy.

2.2 The Draft FDS does not meet the requirements of the NPS-UD. Specifically:

(a) It ignores the economic focus of the NPS-UD and rather than supporting the effective functioning of land and development markets, is instead focussed on preventing further growth.

(b) Infrastructure funding constraints have been used as a rationale to place a moratorium on growth, despite the availability of many alternative funding mechanisms. The Draft FDS contains no discussion of alternative solutions at all.

(c) No consultation has been undertaken with the development community which would have provided the Council with information critical to making informed decisions on these issues.

(d) It inappropriately treats capacity enabled by Plan Change 78 ("PC 78") as "plan enabled", notwithstanding that PC 78 is not operative and to the contrary, there remain significant uncertainties regarding the outcomes of that process (particularly having regard to current work being undertaken on natural hazards);

(e) It fails to include proper analysis of whether plan-enabled capacity is feasible and likely to be realised, simply assuming that take-up will remain at historic levels. In fact, much of the capacity enabled by PC 78 may not be feasible or commercially viable. In this regard:

(i) Capacity enabled by PC 78 is not comparable to that enabled by the Auckland Unitary Plan ("AUP"). Whereas the AUP enabled significant development capacity in areas where there was high demand (e.g. in centres and close to Rapid Transport Networks ("RTNs")), PC 78 has the most impact in areas further from the centre, where demand will be lower.

(ii) There is an assumption that retrofitting the infrastructure necessary to service brownfield redevelopments is feasible and cost effective, when in fact it is likely to be impossible or cost prohibitive in many cases.

2.3 The Draft FDS assumes that servicing greenfield development is more expensive than brownfield development, when in fact having regard to the many constraints faced when retrofitting infrastructure in an existing urban area, this is mostly not the case.

2.4 The options analysis undertaken to assess the different growth scenarios is poorly conceptualised and replete with errors, such that its conclusions cannot be relied upon to support the chosen growth strategy.

2.5 The proposed implementation measures, including making changes to the Regional Policy Statement ("RPS") seek to relitigate matters that were comprehensively addressed by the Independent Hearings Panel ("IHP") on the AUP. The approach proposed in the Draft FDS was resoundingly rejected by the IHP, which found that it would likely have major consequences for land prices and housing affordability.

Implications for Riverhead

2.6 The Draft FDS identifies part of Riverhead for removal from the FUZ because of flood risk, with the remainder as an area "under investigation".

2.7 This land has been the subject of a detailed structure planning exercise to inform the Riverhead South Plan Change.[1] Independent consultants have comprehensively assessed the appropriateness of the land for residential development and prepared a development scheme which responds to the constraints and opportunities offered by the site.

2.8 Flood risk is comprehensively understood (and has been modelled to greater accuracy than the Council's own data) and shows that the extent of the floodplain is in fact smaller than previously understood. It is therefore inappropriate for the Draft FDS to seek to "lock in" decisions about the removal of land from the FUZ in the absence of complete information and detailed expert assessments.

2.9 The reasons identified for placing the remainder of the land "under investigation" are an alleged absence of transport infrastructure to support the development and "*the Potential for higher VKT and CO2 emissions than other FUAs due to Riverhead being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs*."[2]

2.10 None of these reasons withstands scrutiny. In this regard:

(a) The Draft FDS ties the transport infrastructure required to service Riverhead with Kumeu and Huapai. In fact, not all of the upgrades required to service Kumeu and Huapai are required to service Riverhead: they are unrelated.

(b) The Integrated Transport Assessment completed to support the Riverhead Plan Change demonstrates that the transport network can cater for the anticipated demands enabled by the Plan Change. The extent to which there is any dispute about that is a matter for the Schedule 1 process.

(c) In terms of vehicle transport emissions, structure planning has aimed to make the area self-sustaining by providing a balanced provision of residential *and* business land to enable communities to "live work and play" in one location. The likely travel impacts of FUZ areas are grossly overstated and indeed preventing further business development in such areas is likely to have the opposite of the desired effect, because existing residents will continue to need to travel for work and other activities.

2.11 It follows that there is no rationale for the Draft FDS to propose the removal of Riverhead from the FUZ, and to the contrary, detailed structure planning undertaken by RLG has produced a robust and comprehensive development proposal.

1 The Planning, Environment and Parks Committee's decision to reject the plan change for processing under clause 25 of Schedule 1 has been appealed to the Environment Court.

2 *Auckland Future Development Strategy 2023-2053 - Consultation Draft* (Auckland Council, June 2023) at 34.

3. FAILURE TO COMPLY WITH NPS-UD REQUIREMENTS

3.1 The Council has a legal obligation to prepare a future development strategy which meets the requirements of the NPS-UD.

3.2 The Draft FDS does not meet the requirements of the NPS-UD, for the following reasons:

Failure to support competitive land and development markets

3.3 At the fundamental level, the Draft FDS runs directly counter to the imperative in the NPS-UD to support competitive land and development markets, representing an effort to curtail greenfield urban growth in Auckland.

3.4 The Council's assertion that the requirement to deliver "well-functioning urban environments" has shifted the focus of the NPS-UD from an economically focussed policy (per the National Policy Statement on Urban Development Capacity ("NPS-UDC")) to one that incorporates a range of non-economic factors which may override the economic imperative is incorrect.[3]

3.5 The strong economic focus reflected in the NPS-UDC has not been superseded. There remains a strong directive in the NPS-UD for local authorities to deliver greater land supply and support housing affordability. In this regard, the Environment Court has described the purpose of the NPS-UD as follows:[4]

> *"The NPS-UD has the broad objective of ensuring that New Zealand's towns and cities are well-functioning urban environments that meet the changing needs of New Zealand's diverse communities. Its emphasis is to direct local authorities to enable greater land supply and ensure that planning is responsive to changes in demand, while seeking to ensure that new development capacity enabled by councils is of a form and in locations that meet the diverse needs of communities and encourage well-functioning, liveable urban environments. It also requires councils to remove overly restrictive rules that affect urban development outcomes in New Zealand cities."*
>
> *[emphasis added]*

3.6 The Draft FDS enables less, rather than greater land supply. It also seeks to make planning less responsive to changes in demand by proposing changes to the planning documents to implement more restrictive rules, controlling urban development outcomes. This is not what the NPS-UD requires and, as discussed below, is likely to have a chilling effect on Auckland's economy and housing affordability.

Failure to comply with requirements for the preparation of future development strategies

3.7 The preparation of a future development strategy is one of the key implementation methods identified in the NPS-UD to achieve its objectives. The Draft FDS must be consistent with and deliver on the NPS-UD policy framework, including the development imperative set out at paragraphs 3.1-3.6 above.

3.8 This policy direction has been given insufficient focus in the Draft FDS, in favour of delivering on the Council's own interpretation of what is a "well-functioning urban environment." In this regard, while the NPS-UD provides some flexibility for local authorities to formulate their own definition of "well-functioning urban environment", this should not be inconsistent with the overarching policy framework, nor should any

3 *Future Development Strategy – Overall Evidence Report for Consultation* (Auckland Council, June 2023) at 101.

4 *Middle Hill Limited v Auckland Council* [2022] NZEnvC 162 at [33].

additional criteria undermine the delivery of the mandatory elements of a well-functioning urban environment identified in Policy 1(a). Those mandatory criteria include a clear imperative to:

(a) Enable the delivery of a variety of homes in terms of type, price point and location (Policy 1(a)(i));

(b) Enable a variety of sites that are suitable for different business sectors in terms of location and site size (Policy 1(b); and

(c) Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets (Policy 1(d)).

3.9 The Draft FDS does not clearly demonstrate how these requirements will be achieved, beyond the statement that all of the mandatory requirements will be achieved either "directly or indirectly".[5] In particular, the Draft FDS does not identify how the competitive operation of land and development markets – which is critical to housing affordability – will be supported, as required by Policy 1(d).

3.10 There is no legal basis for the assertion in the Draft FDS that the words "*limit as much as possible adverse impacts on*" in Policy 1(d) imply that it is acceptable for planning for other aspects of well-functioning urban environments to generate adverse impacts on competitive land markets. The primary requirement in Policy 1(d) is to "support" the competitive operation of land and development markets. Further, there is no basis for the assertion that the drafting intent was to imply that the source of any "adverse impacts" would be the Council's own planning decisions.

Improper focus on "plan enabled" capacity

3.11 Clause 3.2 requires every tier 1 local authority to provide at least sufficient development capacity in its region to meet expected demand over the short, medium and long term. "Sufficient" in this context means:

(a) Plan enabled;

(b) Infrastructure ready;

(c) Feasible and expected to be realised; and must

(d) Incorporate the relevant competitiveness margin (20% for the short and medium terms and 15% for the long term).

3.12 The primary assumption underpinning the Draft FDS is that there is at least sufficient development capacity available to meet demand in the existing urban area such that the Council does not need to enable urban expansion. The Draft FDS concludes that there is "plan enabled" capacity of 2,345,500 dwellings and this is several times greater than expected demand.

3.13 The assessment of plan-enabled capacity is based on the evaluation of development capacity done as part of the section 32 evaluation for PC 78. PC 78 is not operative and the timeframe for its completion has been extended by a year. Height and density across the urban area is yet to be resolved. In particular, additional analysis is still to be undertaken on flood hazard extents, which may have a material impact on the capacity assumptions within the urban area.

5 *Future Development Strategy – Overall Evidence Report for Consultation* (Auckland Council, June 2023) at 100.

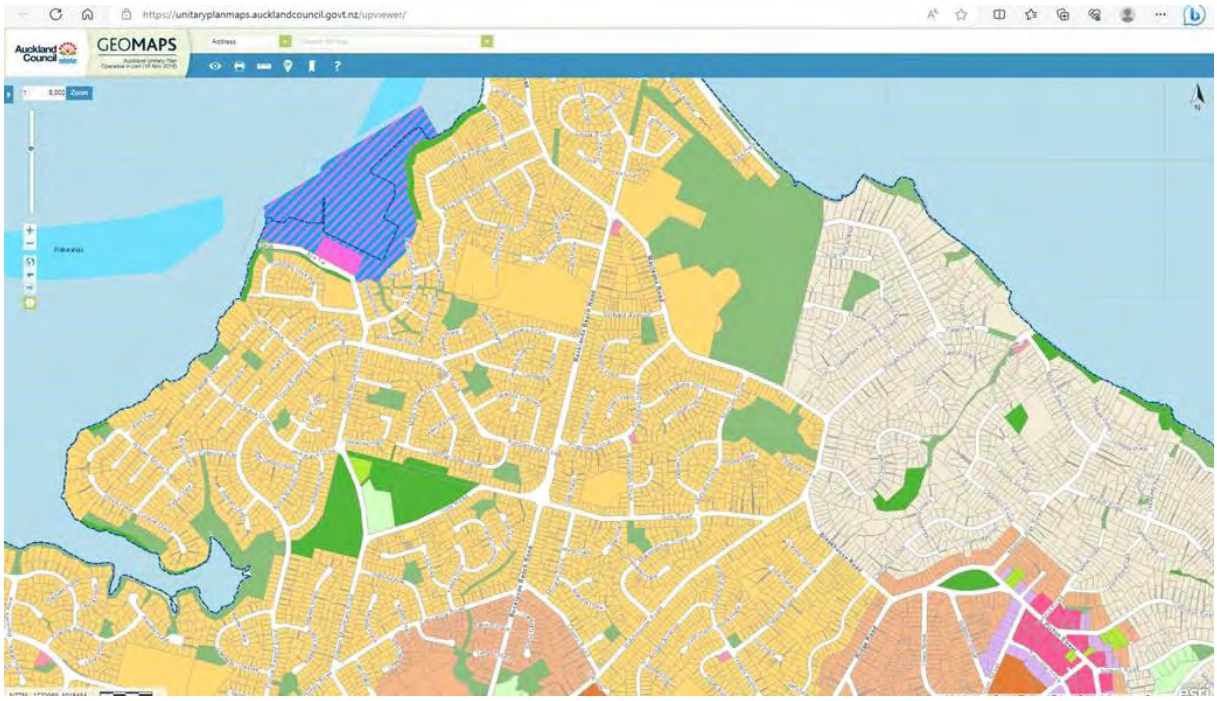
3.14 As such, capacity enabled by PC 78 cannot properly be classified as "plan enabled" and the uncertainties regarding the actual capacity that will be enabled indicate that the Draft FDS is significantly premature.

Failure to consider whether development capacity is feasible and reasonably expected to be realised

3.15 The Draft FDS is required to determine whether the plan-enabled capacity is feasible (i.e. financially profitable to develop), and reasonably expected to be realised (i.e. likely to be taken up by the market).

3.16 The capacity uplifts enabled by PC 78 are inversely proportional to the density already enabled by the AUP. PC 78 is likely to significantly boost capacity in peripheral locations while having little impact in and around centres, where higher density is already permitted by the AUP. Thus, while PC 78 enables unprecedented levels of plan-enabled capacity, much of it is poorly located, suggesting that much of it may not be taken up.

3.17 It also appears that community facilities such as schools may have been included in the assessment of development capacity because they are zoned residential. In reality however, there is no prospect of them being redeveloped for residential. For example, the plan below shows zoning in the Howick area. The large land parcels zoned MHS are for Macleans College, Bucklands Beach Intermediate, Pigeon Mountain School, Howick Primary, Howick Intermediate and Howick College – none of which are likely to be rezoned for residential development.



3.18 There is also no consideration of whether plan-enabled capacity is technically or financially feasible to service. That may not be the case, for example, for replacing water or wastewater trunk mains in densely populated existing urban areas, where the resulting cost and disruption may render it untenable.

3.19 In this regard, the Draft FDS appears to assume that it is cheaper to upgrade existing infrastructure in brownfield areas than to build new infrastructure in greenfield areas. In fact, the costs of replacing old pipes and upgrading utilities, remediating contamination, higher civil and retaining costs, limitations on access, legal and title implications including fragmented land ownership, add significantly to the overall cost.

Neither the Draft FDS nor the supporting evidence reports contain any meaningful discussion of these issues.

Provision of competitiveness margin

3.20 Clause 3.2(d) and 3.22 require that development capacity provided by tier 1 authorities must include a competitiveness margin (20% for the short and medium terms and 15% for the long term) over and above the expected demand.

3.21 The Draft FDS does not provide for a competitiveness margin in its capacity figures. It is therefore uncertain whether this has been properly taken into account.

Failure to engage with development sector

3.22 Clause 3.15 of the NPS-UD requires that the Council engage with the development sector in the preparation of the Draft FDS to:

> *"identify significant future development opportunities and infrastructure requirements."*

3.23 This reflects an intention that local authorities and land developers should work constructively together to deliver urban growth.

3.24 FRL understands that the only members of "the development sector" that the Council has engaged with in the preparation of the Draft FDS are the Property Council New Zealand ("PCNZ") and Kainga Ora. As a government agency undertaking largely brownfield development, Kainga Ora offers a specific perspective on urban development that is not the same as that of the private sector. Similarly, while the PCNZ purports to represent the interests of its members (noting that many of the national-scale development companies are not members), it has no experience of development itself.

3.25 We also understand that the Council has undertaken a survey to ascertain the development intentions of developers in Auckland. FDL did not receive an invitation to participate in this survey and indeed a survey of PCNZ's members has indicated that 93% of those surveyed had not been contacted by the Council.[6]

3.26 The Council has not engaged with FRL or any of the other major developers in Auckland, all of whom could have provided information critical to a full understanding of Auckland's development market and the considerations that are relevant to successful delivery of urban development. This failure to consult is immediately apparent on the face of the Draft FDS, which contains numerous assumptions and assertions which are simply incorrect and could easily have been clarified by the development sector.

4. SPATIAL GROWTH SCENARIOS AND INTENSIFICATION OPTIONS

4.1 Clause 3.14 of the NPS-UD requires that the spatial strategy is informed by "*consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS."*

4.2 The *Growth Scenarios Evidence Report* ("GSER") prepared to inform the Draft FDS includes an analysis of four growth scenarios representing different spatial options for land uses (Climate, Intensive, Compact, and Expansive) to accommodate growth over the next 30 years.[7] It states that the scenarios have been tested against a "*multi-criteria*

6 Presentation on "Auckland Future Development Strategy" (Property Council New Zealand, July 2023).
7 *Auckland Future Development Strategy - Growth Scenarios Evidence Report for Consultation* ("GSER") (Auckland Council, June 2023).

analysis relying on modelling outputs as well as quantitative and qualitative information."[8]

4.3 FRL has undertaken a comprehensive review of the spatial scenario analysis and identified numerous flaws which undermine the validity of the analysis and conclusions.

Inclusion of implausible options

4.4 The process used to derive the four options has a major bearing on the overall direction and likely findings of the analysis. Of particular concern is the inclusion of an unrealistic benchmark scenario (Scenario A) that assumes different development patterns, home and job locations, and travel habits to the other three scenarios, but which are often masked or not properly acknowledged, causing the other three scenarios to be unfairly assessed.

4.5 The GSER states that "*four growth options were developed, representing different spatial options for land use, accommodating a consistent quantum of Auckland's growth and change in dwellings and jobs over the next 30 years*."[9] Similarly, on page 5, the report records that: "*four alternative growth scenarios were developed, each representing a different urban form."*[10] These descriptions indicate that the four scenarios are equally plausible but differ (mainly) in their associated urban form. However, that is not the case.

4.6 There are fundamental differences between Scenario A and the other three scenarios. Whereas the first three scenarios were derived via workshops held with subject matter experts, Scenario A was derived during the development of the Transport Emissions Reduction Pathway ("TERP") by a smaller subject matter expert group to "*reflect a spatial distribution world where climate mitigation and adaptation interventions and land use planning were prioritised over other goals and objectives for the region*." As a result, Scenario A is based on different (and unrealistic) assumptions which make it incomparable to the other scenarios and a poor benchmark for evaluating those other scenarios. For example, the report states:[11]

> *"The evaluation found little difference between the scenarios in terms of model outputs relating to travel behaviour, except for Scenario A which…deliberately [included] significant shifts in land use patterns and transport assumptions."*

4.7 Scenario A incorporates fundamentally different, unsubstantiated transport assumptions that defy any like-for-like comparison with the other scenarios, including that:[12]

(a) People with office jobs work from home 1 day per week (which is about triple the rate assumed for the other three scenarios);

(b) Public transport fares are $2 per trip forever (regardless of trip length/mode); and

(c) The uptake of active travel modes is much greater than in the other scenarios.

4.8 Scenario A also assumes much higher levels of job and housing growth "*to enable the model to make more decisions on uptake of development capacity including providing a significantly more mixed-use environment to support more dispersed employment locations"*.[13] Consequently, Scenario A assumes much closer spatial matches between

8 GSER at 4.
9 GSER at 4.
10 GSER at 5.
11 GSER at 8.
12 GSER at 19.
13 GSER at 13.

the locations of new jobs and new homes than the other scenarios, which directly bolsters its modelled travel benefits.[14]

4.9 Further, Scenario A assumes that relatively high-density development will occur throughout the region, even in remote rural areas, with 80% of future dwellings in rural nodes expected to be "attached" versus only 20% currently.[15] Finally, Scenario A withdraws capacity outside areas for intensification "*as a way to influence the model to respond according with the scenario narrative*."[16] Scenario A is therefore neither plausible nor realistic, so including it is inappropriate as it sets an unfair benchmark against which other scenarios are assessed.

4.10 Similarly, Scenario D is not credible because it reflects a highly dispersed urban form that is also a major shift from the current approach. Scenario D sees only 52% of new homes inside existing urban areas, with 48% in the FUZ and rural areas. This implied future spatial direction is a wholesale departure from the agreed "70/40" split underpinning the current strategy reflected in the AUP and thus also has no real-world basis.

4.11 In summary, therefore, two of the four options have limited real-world value for determining the optimal way to accommodate growth in homes and jobs over time, which undermines the validity of the entire exercise.

Absence of status quo option

4.12 There is also no scenario representing the status quo. This is highly unusual, because the default course of action for virtually every options assessment is to simply "do nothing". Absent of such an option in the assessment, it is impossible to properly compare the potential impacts of the different scenarios to the current evidence-based trajectory.

Flaws in assessment criteria

4.13 It is apparent that no objective assessment of the scenarios has been undertaken. The criteria used to assess options should be identified independently from the options themselves to avoid potential bias, especially when scores depend on experts exercising their professional judgement. Instead, the criteria appear to have been derived from the scenarios, resulting in a circularity between the scenarios and the assessment. Because of this, the Draft FDS records that the results are "thematic",[17] therefore undermining the validity of the exercise.

4.14 The assessment criteria also fails to consider areas of common ground and instead focuses only on differences between the options. Specifically, page 21 of the GSER lists evaluation themes (i.e. criteria) that were initially deemed important, but were later disregarded entirely or considered only fleetingly because the evaluators decided to consider only points of difference. The report states that *"Having considered the range of criteria identified, it was then determined that only criteria that would differentiate the scenarios should be taken through into the evaluation process."* [18]

4.15 While the differences may be of greater analytical interest than commonalities, omitting criteria where the scenarios perform similarly systematically distorts the nature and extent of the differences between the options. Furthermore, several key issues are not

14 This can be seen on page 15, where the assumed locations of new jobs and homes is almost perfectly spatially aligned in Scenario A compared to the other scenarios.
15 GSER at 20.
16 GSER at 13.
17 GSER at 8.
18 GSER at 22

covered in any meaningful detail (presumably because the evaluators considered them areas of common ground), including: [19]

(a) Development feasibility;

(b) Housing affordability; and

(c) Ensuring there is enough land for business.

4.16 Meanwhile, transport impacts and accessibility account for 11 of 29 criteria (38%), compared to only two criteria for natural hazards and climate change adaptation/mitigation (7%). This means that transport and accessibility effects receive more than five times the weight of climate change adaptation and mitigation effects in the growth options assessment (i.e 38% vs 7%).

4.17 While transport issues are important, the FDS can only have a very limited impact on the region's future emissions profile because most of the urban form is already fixed. Further, light passenger vehicles account for only a modest fraction of national CO_2 emissions. In this regard, the latest Greenhouse Gas Inventory (published in 2023) shows that cars produce only 8% of total (gross) CO_2 emissions[20] and average CO_2 emissions of cars are already falling due to rapid shifts towards electric, hybrid, and other low-emissions vehicles. By 2050, petrol cars will account for just over 10% of total Vehicle Kilometres Travelled ("VKT"), with hybrid and electric cars accounting for more than 70%.[21] Therefore:

(a) Policies aimed at curbing Green House Gas ("GHG") emissions from cars will have limited impacts on meeting national emissions targets; and

(b) Seeking to reduce CO_2 emissions via the spatial location of new jobs and homes will have very little impact overall.

4.18 Thus, while reducing vehicle emissions (particularly in the short term) is important, this is not an appropriate primary focus for the Draft FDS.

Inclusion of flawed assumptions and processes

4.19 Some of the model's inputs are out-of-date. For example, the modelling assumes the need to accommodate an extra 408,000 dwellings and 380,000 jobs over the next 30 years, compared to only about half that amount in the Draft FDS itself. By modelling much higher levels of growth than are now anticipated, the analysis overstates the travel (and GHG emissions) impacts of each option.

4.20 Other inputs of concern include the unreferenced and unsubstantiated assumptions that:

(a) A city centre cordon and road pricing are in effect from 2031 and 2041, respectively.[22]

(b) Infrastructure required for all options is technically feasible.[23]

19 GSER at 22; see the list of initial criteria themes in Box 3.
20 Ministry for the Environment "About New Zealand's Greenhouse Gas Inventory" (27 May 2021) <www.mfe.govt.nz/climate-change/state-of-our-atmosphere-and-climate/new-zealands-greenhouse-gas-inventory>.
21 **Error! Hyperlink reference not valid.**Jayne Metcalfe and Serge Peeters "Vehicle Emissions Prediction Model VEPM 6.3 update technical report" (28 April 2022) Emission Impossible Ltd and M&P Consulting Ltd <www.nzta.govt.nz/assets/Highways-Information-Portal/Technical-disciplines/Air-quality/Planning-and-assessment/Vehicle-emissions-prediction-model/VEPM-6.3-technical-report-2022.pdf>.
22 GSER at 17.
23 GSER at 18.

4.21 Infrastructure requirements for the FUZ have been closely studied, but this is not the same for the infrastructure required to support widespread intensification under PC 78. As discussed in Section 6 below, there is significant uncertainty that the infrastructure upgrades needed to support the intensification enabled by PC 78 are feasible.

4.22 The reliability of the model's processes, and hence outputs, is also a concern. For example, page 12 of the GSER records that the model crashes and breaks if there is insufficient capacity, which raises concerns about its robustness and reliability. Further, page 18 of the GSER records that the model has limitations in relation to capturing behaviour change even though that is critical to realising the alleged benefits of certain scenarios. At page 24, the GSER states that:

> *"To direct 'take up' to specific locations sometimes required plan-enabled capacity to be reduced or capped to limit take up and force the model to develop in accordance with the scenario narrative."*

4.23 Interfering with the model's operation and forcing it to take actions that suit a scenario narrative directly invalidates its outputs and casts serious doubt over the objectivity of the overall modelling process itself.

Flaws in approach to scoring

Reliance on subjective assessment

4.24 The majority of criteria were primarily subjectively evaluated by subject matter experts.[24] It is therefore essential that an appropriate mix of experts is used to assess them. However, the number of experts engaged, their qualifications, experience, and areas of expertise are not recorded. The expert group is recorded as comprising only members of the (unnamed) project team plus subject matter experts from Council departments and Council Controlled Organisations ("CCOs"). This raises concerns that a sufficiently deep and broad mix of expertise has not been utilised. There has also been no expert input from any other key stakeholders, such as the development community, which reduces the credibility and reliability of the scores.

Flaws in assessment measures

4.25 In addition, the measures against which criteria were assessed contain numerous flaws. In this regard:

(a) Access to open space is measured by the number of households and people within a walkable catchment of an open space that is at least 3000m^2.[25] Not only is this size threshold arbitrary, but the criterion itself does not consider the quality of the experience, nor the likelihood of congestion occurring at existing parks in scenarios with high intensification.

(b) The extent to which population is exposed to harmful air emissions from transport focusses on the *generation* of emissions, not the population's *exposure* to them.[26] This is highly misleading given the criterion's title, and it directly obscures the likely health impacts of scenarios that rely on high levels of intensification (such as Scenario A). Instead, this criterion assigns Scenario A the highest score possible.

24 Natural hazards, Carbon emissions, Housing choice, Biodiversity, Health of water bodies, Water quality, Highly productive soils, Natural and built heritage, Access to social infrastructure, Air quality, Māori and cultural landscapes, Costs of development, Infrastructure and Market feasibility: see GSER, page 25.
25 GSER at 36.
26 GSER at 37.

(c) Access to social infrastructure was defined to include access to hospitals via active modes or public transport.[27] Hospitals are visited only rarely. And, when they are accessed, it is usually in a hurry via a car or ambulance. Accordingly, the accessibility of hospitals via public transport and active modes is a crude and very narrow way to measure each option's access to social infrastructure.

(d) Similarly, access to social infrastructure and employment in high deprivation areas is partly based on accessibility to tertiary education via active modes or public transport.[28] However, very few regional residents are enrolled in tertiary education, so this is an unduly narrow way to measure the overarching criterion. Further, many people are now regularly accessing tertiary education online.

No reflection of cardinal modelling

4.26 Another issue arising in respect of the scoring is that the cardinal nature of the modelling outputs is not reflected in the multicriteria analysis scores. For example, an option may have scored only slightly better than another on a specific criterion according to the modelling, but the scores imply that it performed two or three times better overall. This issue affects at least three of the 29 criteria, including:

(a) The extent to which scenarios impact carbon emissions;[29]

(b) Mixed use communities;[30] and

(c) Accessibility to key economic activity.[31]

Inconsistency/errors in scoring

4.27 In addition, the scoring for several criteria does not reflect the preceding discussion. This issue affects at least three of the 29 criteria, including:

(a) The degree to which urban development consumes highly productive land.[32] For this criterion, Scenario C was scored as negative two because of its FUZ land despite the preceding discussion clearly stating that FUZ land is exempt from the requirements of the National Policy Statement on Highly Productive Land;

(b) Housing choice;[33] and

(c) Access to social infrastructure.[34]

Failure to weight criteria

4.28 Finally, the evaluation does not weight the criteria. This is highly unusual, and it directly elevates the importance of some factors while systematically downplaying others. That is because, absent of weighting, the more criteria per theme, the greater the weight afforded that theme in the evaluation, and vice versa. For example, suppose that one theme is measured by ten criteria, while another theme is measured by only two criteria. If weights are not applied, the first theme carries five times as much weight in the

27 GSER at 40.
28 GSER at 41.
29 GSER at 32.
30 GSER at 40.
31 GSER at 45.
32 GSER at 35.
33 GSER at 39.
34 GSER at 42.

overall assessment than the other. Usually, this is addressed by applying weighting that mitigate differences in criteria breadth and depth, but that is not the case here.

4.29 The following table puts the issue in context by showing the share of the 29 criteria that fall into (our suggested) evaluation themes, and the implied weighting on each overall:

Evaluation Themes	Number of Criteria	Implied Weight
Travel Impacts/Accessibility	11	38%
Environment	4	14%
Land & Housing Markets	4	14%
Social/Culture/Heritage	2	7%
Economy	2	7%
Infrastructure	2	7%
Māori	2	7%
Natural hazards/Climate adaptation	2	7%
Total	**29**	**100%**

Number of Criteria and Implied Weighting by Evaluation Theme

4.30 The result is that some themes have been given excess weight at the expense of others, without explanation, distorting the overall assessment.

Summary

4.31 It is apparent from the above that the consideration of spatial growth scenarios that has informed the Draft FDS is replete with baseless assumptions, inconsistencies and errors.

4.32 It is therefore of little assistance in terms of identifying the appropriate strategy for urban growth in Auckland and cannot be relied upon to justify the strategy set out in the Draft FDS.

5. LIKELY EFFECTS OF THE DRAFT FDS ON HOUSING AFFORDABILITY AND CHOICE

5.1 The primary assumption underpinning the Draft FDS is that there is already at least sufficient development capacity available to meet demand in the existing urban area, such that the Council does not need to enable any significant urban expansion.

5.2 As set out in Section 3 above, that approach runs counter to the strong directive in the NPS-UD for local authorities to deliver greater land supply and support housing affordability.

5.3 FRL agrees that brownfield development and urban regeneration should be an important element of Auckland's urban growth model. However, that should not be the only focus.

Need for brownfield and greenfield development and risks of under-supply

5.4 The question of how to manage Auckland's urban growth was considered at length by the IHP on the AUP, chaired by the now Chief Environment Judge, which heard extensive economic and planning evidence regarding the potential risks and benefits of different growth strategies. Having heard that evidence, the IHP concluded that it was critical to the long-term well-being of people and communities in the region that errs toward over-enabling capacity. The IHP said:[35]

35 *Report to Auckland Council Overview of recommendations on the proposed Auckland Unitary Plan* (Auckland Unitary Plan Independent Hearings Panel, July 2016) at [6.2.2].

> *"…the implications for individuals and the community from an under-supply of enabled residential capacity (e.g. house price escalation, over-crowding, extended commuting distances, and migration out of the region) are much more severe than those of an oversupply of enabled capacity (e.g. the inefficient use for a period of land zoned for future urban use). Property markets are able to respond to the over-supply of enabled capacity by, for example, deferring the development of some land zoned for future urban, whereas markets are not able to remove the constraints and distortions from the under-supply of enabled capacity. Thus the Auckland region can be expected to perform more efficiently if the Unitary Plan errs toward an over-supply of enabled capacity than toward an under-supply. Given the level of uncertainty in the projections of demand and supply for the long term, it is neither practical nor prudent to try and target a precise level of enabled capacity."*

5.5 The IHP concluded that it is important to provide multiple ways of accommodating growth, in both brownfield and greenfield areas, to ensure that sufficient development capacity is delivered.

5.6 Notwithstanding the IHP's efforts to ensure sufficient capacity and maintain housing affordability, it is apparent that housing affordability remains a major issue for Auckland and that planning controls are a significant cause. Recent work by the New Zealand Infrastructure Commission has found that urban planning controls have had a major impact on land prices (and therefore affordability), having reviewed the effect of Auckland's Make the Rural Urban Boundary ("RUB") and similar provisions in five other urban areas (Hamilton, Tauranga, Wellington, Queenstown and Christchurch) at two points in time – 2010/11 and 2020/21. It found that:[36]

> *"land just inside the boundary of rural areas and urban areas of a city costs significantly more than would be expected, using land just outside the boundary as a comparator – even after accounting for amenities and infrastructure costs that add value to urban land."*

5.7 Constraining development in the FUZ is a significant concern in terms of fostering and maintaining competition. Without a strong and ongoing supply of new urban land in strategically chosen locations (as per the current development strategy), the competitive operation of the region's urban land market may be compromised. Economic theory explains the potential risks of this loss competition as follows:

(a) **Preventing Market Power and Monopoly**: Competition prevents the concentration of market power and the emergence of monopolistic practices in land markets. If a single entity or a small group of firms dominates the market, they can exert control over prices, limit choices, and stifle competition. Competition avoids this prospect by enabling multiple buyers and sellers to interact within local land markets.

(b) **Consumer Choice and Affordability**: Competition enhances consumer choice and promotes affordability in land markets. When there are many developers and landowners competing for buyers or tenants, consumers have a wider range of options to choose from. This competition exerts downward pressure on prices, making land and housing more affordable for a broader segment of the population. Moreover, competition encourages developers to differentiate their offerings by providing better amenities, quality construction, and innovative designs.

(c) **Price Discovery**: Competition enables price discovery. When multiple buyers and sellers actively engage in a market, they compete to buy or sell on the best

36 New Zealand Infrastructure Commission. (2023). Urban land prices – a progress report. Wellington: New Zealand Infrastructure Commission / Te Waihanga at 8.

possible terms, thereby enabling "discovery" of the current market price (where supply and demand meet). This ensures that market prices better reflect the true value of land based on its size, location, potential uses, and other valued attributes (rather than the profit-seeking behaviour typical of monopolies).

(d) **Efficiency and Productivity**: Competition fosters efficiency and productivity in land markets. In competitive environments, developers and landowners strive to maximise returns by using land resources optimally. This fosters innovative land uses, such as mixed-use development, and adaptive reuse of existing structures. Competition drives developers to find creative solutions to meet the changing needs of residents, leading to improved productivity and efficient land utilisation.

(e) **Investment and Development**: Competition also attracts investment and spurs development in nearby areas. When developers and investors perceive a viable market, they are more likely to invest in land and undertake development projects. The prospect of earning profits motivates developers to take risks and initiate new projects. Increased investment and development activities contribute to economic growth and job creation.

5.8 Despite this, the Draft FDS proposes to significantly constrain greenfield urban growth. In reaching its conclusion that there is now more than sufficient capacity available for urban development in the existing urban area, the Draft FDS relies heavily on PC 78, which has not yet reached the hearing stage and in fact has been deferred by a year. Although the Council is statutorily obliged to implement this plan change, there remains significant uncertainty regarding the extent of development capacity that will be realised as a result, particularly having regard to the decisions required to accommodation for natural hazards. These uncertainties have not been addressed in the Draft FDS.

Failure to consider locations of brownfield intensification

5.9 Further, PC 78 will increase capacity in relatively remote existing urban locations, such as southern brownfield areas where job accessibility is poor, but will produce very little capacity in areas where growth is most desired to achieve a compact urban form. For example:

(a) The city centre accounts for 5% of existing dwellings, but only 3.5% of plan-enabled capacity; and

(b) The inner suburbs account for 3.4% of existing dwellings, but only 1.5% of plan-enabled capacity.

5.10 In contrast, the northern and southern rural towns account for a notably higher share of plan-enabled capacity than their corresponding shares of existing dwellings. Thus, while PC 78 may enable significant new plan-enabled capacity, it does not necessarily help meet the region's goal of a compact urban form. In fact, because the capacity uplifts caused by PC 78 are inversely proportional to the density already enabled by the AUP, it significantly boosts capacity in peripheral locations (with a Residential - Single House zoning), but has relatively little impact in and around centres with Residential – Terraced Housing and Apartment Buildings ("THAB") zoning. As a result, it is questionable whether that capacity is in the right places to achieve the desired urban form. The Draft FDS contains no consideration of these issues.

Serviceability and commercial feasibility of brownfield development

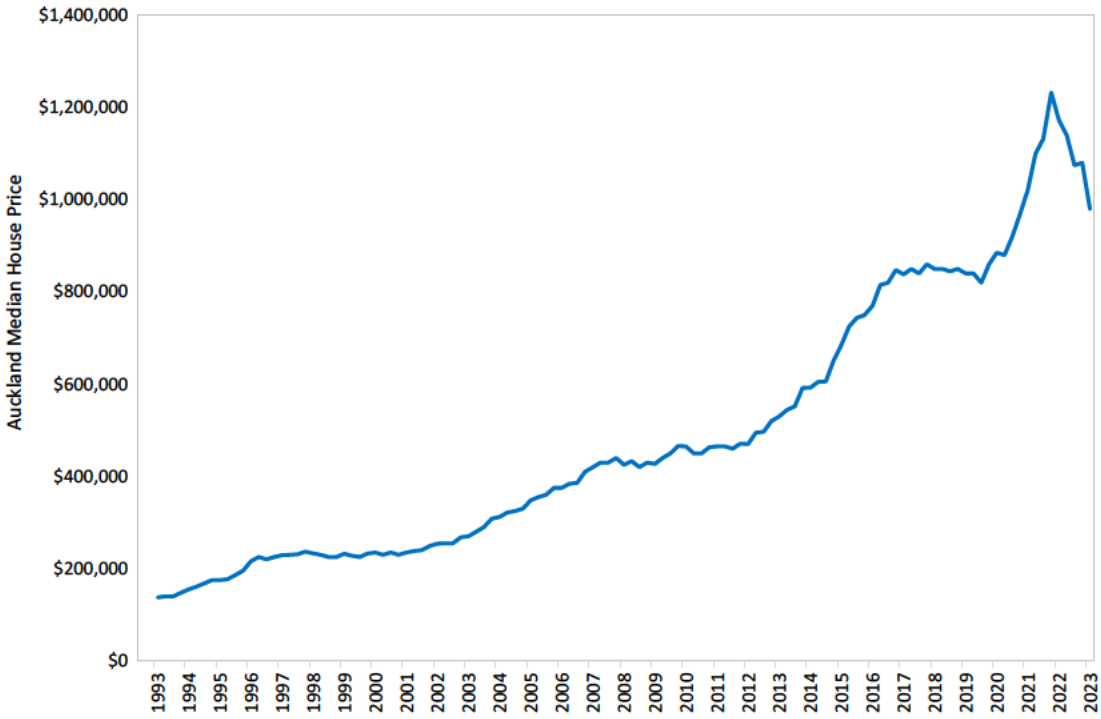
5.11 The Draft FDS also does not properly consider the serviceability or commercial feasibility of the identified development capacity.

5.12 Regarding serviceability, the Draft FDS simply assumes that any infrastructure required to service growth will be technically feasible. However, that will not always be the case.

The disruption associated with upgrading infrastructure (for example, wastewater pipes) through a densely populated urban area may render it technically (and/or practicably) infeasible. However, this is not addressed in the Draft FDS.

5.13 Regarding commercial feasibility, the Draft FDS appears to assume that because plan-enabled capacity is several times the level of expected demand, sufficient capacity will be feasible.[37] In fact, development feasibility has changed dramatically over the last few years due to the compounding effects of lower house prices, higher construction costs, and significantly higher interest rates. Together, these changes conspire against the feasibility of a increasing density scale and may result in a shortfall, particularly over the longer term.

5.14 Figure 5 below shows how Auckland's median house price has tracked over time. While it has climbed steadily since the early 1990s, the region's median dwelling price has fallen precipitously from about mid-2021 onwards (when the Draft FDS' modelling appears to have been done). In fact, the median price has fallen from $1.23 million in mid-2021 to only $980,000 in early 2023, a drop of more than $250,000 (or 20%) in less than two years. Coupled with the near-30% increase in residential construction costs over the same period, it should be clear that development feasibility has changed fundamentally and hence that relying on previous feasibility analyses is inappropriate.



Auckland Median Dwelling Price (from NPS-UD dashboard)

5.15 In terms of likely realisable capacity, the Draft FDS appears to rely on historic uptake to determine that sufficient realisable capacity exists. Specifically, it states:[38]

> *"Take-up has been high in almost all areas where intensification has been enabled by the AUP, including in relatively low land-value*

37 *Auckland Future Development Strategy 2023-2053 - Consultation Draft* (Auckland Council, June 2023) at 29.

38 *Auckland Future Development Strategy 2023-2053 - Consultation Draft* (Auckland Council, June 2023) at 30.

locations. Ongoing take-up of these opportunities is reasonably expected wherever they are provided."

5.16 FRL agrees that take-up will continue, but there is no evidence to support the assumption that it will continue like it has previously. First, feasibility has changed substantially. Second, many of the best intensification opportunities will have already been taken up, with those remaining likely to be more marginal. Third, the capacity unlocked by PC 78 is not like the capacity unlocked by the AUP: whereas the AUP targeted additional capacity in areas where it would be taken up, as set out above, PC 78 applies a blanket approach which is highly unlikely to result in increased development in many areas. This statement therefore contains a false equivalence.

5.17 Accordingly, the issues that were addressed by the AUP IHP regarding the risks of under-supply remain. There is therefore a major risk that the Draft FDS will have a very significant impact on urban land pricing and consequently, housing affordability.

6. RATIONALE FOR GREENFIELD DEVELOPMENT

6.1 Enabling well planned greenfield development alongside urban regeneration is critical to ensure that there is sufficient residential capacity to meet demand and to support the competitive operation of land and development markets, thereby supporting housing affordability and choice.

6.2 Greenfield development offers the opportunity to provide an important part of the market: in accordance with AUP requirements, greenfield developments are typically comprehensively master planned and result in a much higher quality neighbourhood (in terms of subdivision and roading layout, stormwater management, community facilities, etc.) than can be achieved when attempting to retrofit modern development into an existing urban area.

Timing and funding of infrastructure provision

6.3 It is apparent that the key factor underpinning the Draft FDS is the significant budget constraints currently faced by the Council. The Council's response is to put a moratorium on growth until funding issues are resolved and infrastructure can be funded.

6.4 The problem with this approach is that demand for housing and business development will continue, notwithstanding the Council's financial position. It also narrowly assumes that all infrastructure is Council funded, which is not always the case as private developers are often responsible for funding necessary upgrades.

6.5 The Draft FDS includes the fundamental misconception that it is cheaper and easier to upgrade existing infrastructure in brownfield areas than to build new infrastructure in greenfield areas. This is incorrect. In this regard FRL's experience is that:

(a) At scale, the cost of developing on brownfield sites is actually much more than a greenfield site: typically two to three times the cost due to the complexities of retrofitting an existing built up area.

(b) Typically, the costs of replacing old pipes and upgrading utilities, remediating contamination, higher civil and retaining costs, limitations on access, legal and title implications including fragmented land ownership, add significantly to overall cost.

(c) Assembling large tracts of brownfield land is problematic due to existing subdivision and land ownership patterns. Brownfield blocks tend to be smaller.

(d) Greenfield development offers a more efficient provision of infrastructure. That infrastructure is paid for by the development whereas in brownfield development this falls more to the Council.

(e) While greenfield development can impact broader regional infrastructure costs, there are various options available to fund that infrastructure, as discussed below.

6.6 In summary, intensification at scale is slow, expensive, and not practicable in many places of Auckland. Brownfield development can be successful for small infill type development and on the few large land holding blocks, which will continue to contribute to Auckland's growth, but this is not the full solution for providing for growth and affordable housing, nor will it provide for the capacity assumed by the Draft FDS.

Infrastructure funding

6.7 The Draft FDS is entirely silent on other funding options available to fund infrastructure. In fact, there are many other options available that could be explored to enable the coordinated release of greenfield land, including:

(a) Private sector funding of key infrastructure;

(b) The option of partnership arrangements between the private and public sectors to fund infrastructure over time;

(c) Infrastructure funding agreements and the opportunity to build in mechanisms to fund work as land owners benefit from early infrastructure investment; and

(d) Utilisation of the tools in the Infrastructure Funding and Financing Act 2020.

6.8 The Draft FDS appears to assume none of these are applicable or workable. Having regard to the potentially significant economic consequences of constraining growth in the manner proposed, equal energy should be put into identifying innovative proposals that could work on targeted growth areas.

6.9 In addition, the Draft FDS appears to reflect the position that it is necessary for all major infrastructure upgrades to be funded and/or in place before land can be rezoned. That is unnecessary and in fact represents poor planning practice. The NPS-UD requires that urban development is "integrated" with infrastructure planning and funding decisions. As the IHP on the Drury East Plan Changes observed:[39]

> *"The essence of integration is that those matters happen contemporaneously, in a complementary way, and over time….*
>
> *A sequential approach…would compromise the potential for urban zoning and development to occur in a timely and integrated fashion … That is because live zoning provides certainty and gives confidence to landowners (and central and local government agencies) that expenditure on infrastructure will be worthwhile and efficient."*

6.10 It is unnecessary, and potentially economically wasteful, to require all infrastructure required to support a large, staged development to be present at the outset. Implementing infrastructure before it is required can incur unnecessary financing costs over the period when it is unused or under-utilised. Some infrastructure, such as waste water networks, require a critical volume to operate efficiently, and so unused or under-utilised periods can lead to technical issues. It also prevents funds from being applied to other infrastructure that will be needed sooner. Once implemented, infrastructure needs to be maintained, which incurs costs. Installing infrastructure only when it is needed avoids those interim maintenance costs.

39 *Proposed Private Plan Change 49 - to the Auckland Unitary Plan, Decision following the hearing of a Private Plan change under the Resource Management Act 1991* (Auckland Council, August 2021) at [179]-[180].

Infrastructure triggers

6.11 The analysis which has informed the infrastructure "triggers" for future land release has been undertaken at a coarse scale, and the actual infrastructure requirements required to service land will vary depending on factors including the nature of the development, infrastructure solutions proposed and the status of development on neighbouring sites.

6.12 Over time, infrastructure requirements and solutions are likely to change. For example, the transport projects listed are (for the most part) those set out in the Regional Land Transport Plan ("RLTP"), which is subject to review and change every six years. Further, Appendix 3 of the Draft FDS records that two key transport documents are currently being finalised, being the Auckland Rapid Transit Plan ("ARTP") and the Tāmaki Makaurau Integrated Transport Plan ("TMTP"). As such, projects and project timeframes are subject to change.

6.13 The extent of several projects is significant, such as Mill Road, the North Shore Rapid Transit (extension to Milldale), North-west Rapid Transit and SH16-SH18 Connections. The Draft FDS does not give regard to how these upgrades may be staged, or how interim interventions put in place by the transport authorities may deliver or assist in delivering suitable short to medium term network improvements. For example:

(a) A new Westgate bus station and improvements along SH16 for buses currently being implemented will improve public transport attractiveness and reliability for the North-west, such that the effect between the ultimate outcome (North-west Rapid Transit) and the interim outcome may be relatively minor (more resilient) when considering the timing of development;

(b) The recently completed Northern Corridor Improvements extends the Northern Busway to Albany and therefore assists with improving bus reliability for bus users to the North; and

(c) The provision of bus shoulder lanes in the future on SH1 to Silverdale, where limited interchange crossings exist would present a feasible, reliable and low cost alternative that benefits bus users, with improved frequencies for local service, delivering a viable medium term solution. This approach is already being applied to SH16.

6.14 It is inappropriate to prohibit development where safe transport solutions can be addressed prior to the ultimate corridor upgrade being delivered.

6.15 The identified corridor upgrades do not only address transport (safety, active modes and capacity) but also include a significant amount of land and cost to improve stormwater improvements (for example, the Coatesville-Riverhead Highway upgrade), requiring private land acquisition. It is unreasonable for the Draft FDS to tie the development of private land to transport upgrades, as:

(a) Private land requires third party land acquisition which only the regulatory authorities can deliver.

(b) Safe, effective and efficient solutions can be delivered by private developers within the existing road reserve, which addresses the transport effects of private development.

6.16 Having regard to the above, while alignment of infrastructure and development over the long term is of course critical, it is unnecessary and inappropriate for infrastructure considerations to control development to the extent that a moratorium is placed on growth until infrastructure is available.

6.17 The appropriate time to consider whether the necessary infrastructure is available to support a greenfield development is at the plan change stage, when the proposed

development and its context is fully understood. There is an established legal position regarding the extent of infrastructure required to service a proposed development or rezoning[40] which can be thoroughly tested via the Schedule 1 process. The current framework which includes placing land use and infrastructure upgrade triggers into planning provisions allows the opportunity for developers to progress (working with the road controlling authorities) transport upgrades which inevitably saves the roading authorities money.

Carbon emissions

6.18 In terms of carbon emissions, the Draft FDS also appears to be premised on the assumption that concentrating urban growth in the existing urban area will reduce vehicle emissions. There is no evidence to support that assumption.

6.19 To the contrary, enabling the development of well-functioning urban environments, including business development on the urban fringe will support those areas as self sustaining neighbourhoods in which people can live, work and play, thereby reducing travel requirements.

6.20 Residential growth enabled in recent years has increased the population around Auckland's fringe. However, the development of employment land, and the provision of public transport networks, have not occurred at a similar pace, which in turn requires people to travel large distances to reach employment hubs.

6.21 The Auckland Transport Alignment Project ("ATAP") report that underpins the transport investments included in the Regional Long Term Plan (and the Draft FDS) highlights the:[41]

> *"significant unevenness to future employment accessibility and a growing polarisation of access to employment in the future. By 2046 more than a million people will be living in the western and southern parts of Auckland, nearly half the region's population. However, these areas see relatively little improvement in their access to employment over time."*

6.22 The 2018 Census commuting data shows that a large number of people commute to employment areas where light industrial activities are located, including:

(a) North Harbour Industrial Estate;

(b) Wairau Valley;

(c) Penrose/Mt Wellington/Onehunga;

(d) Henderson;

(e) East Tamaki (Highbrook); and

(f) Auckland Airport.

6.23 The mode of travel for the majority of these trips will be by private car, as frequent and reliable public transport connectivity does not exist to all areas, noting also that many

40 *Landco Mt Wellington v Auckland City Council* [2009] NZRMA 132, *Laidlaw College Inc v Auckland Council* [2011] NZEnvC 248.

41 Ministry of Transport NZ "Auckland Transport Alignment Project (ATAP) – Evaluation report" (September 2016) <www.transport.govt.nz/assets/Uploads/Report/ATAP-Evaluation-Report.pdf> at 15.

light industrial businesses include shift work which makes catching public transport less attractive due to off peak reliability and safety.

6.24 Existing commuter travel patterns are shown in the plan below:

North - Silverdale/Whangaparāoa	Northwest - Whenuapai/Hobsonville/Kumeu
	
Number of commuters to prominent light industrial employment areas – 3,800	Number of commuters to prominent light industrial employment areas – 2,300
Estimated annual private vehicle kilometers travelled (vkt) – 50 million	Estimated annual private vehicle kilometers travelled (vkt) – 20 million
Reduction in vkt if 15% work locally – 7 million vkt	Reduction in vkt if 15% work locally – 3 million vkt
Reduction in vkt if 30% work locally – 15 million vkt	Reduction in vkt if 30% work locally – 6 million vkt
Reduction in vkt if 45% work locally – 21 million vkt	Reduction in vkt if 45% work locally – 9 million vkt

Commuter travel patterns (using 2018 census data)

6.25 Providing employment opportunities closer to the new residential areas established around Auckland's fringe (Whenuapai, Silverdale and Pukekohe) is critical to achieving positive transport outcomes for the region, because it:

(a) Reduces the need to travel by private vehicle across the region to access jobs;

(b) Provides the ability to live, work and play about the same suburb, and substantially reduces VKTs;

(c) Allows more focussed public transport connections/routes to be established. Each area (Whenuapai, Silverdale and Pukekohe) has a nearby RTN station and therefore has the ability to extend or provide shorter and more frequent local bus services between residential and employment areas as they develop; and

(d) Provides safe connectivity for road freight and vehicle-based employment related trips, because each area already has established connectivity to the state highway network.

6.26 The Draft FDS also fails to consider the potential extension of commuter rail in the west. Both Riverhead and Kumeu are located near the existing North Auckland Rail Line, which is existing infrastructure that could be utilised for the extension of commuter rail from Swanson, reducing VKT and emissions while managing the transport network.

6.27 In summary, the Draft FDS ignores key accessibility challenges faced by Auckland growth areas as set out in the ATAP Evaluation Report and does not contribute towards reducing VKT for those residential areas already established/establishing about the outer areas of the region.

7. PROPOSED IMPLEMENTATION MEASURES

7.1 The Draft FDS records an intention to implement changes to the AUP to require stricter compliance with the Council's growth strategy. Specifically, the Draft FDS proposes the initiation of a change to the RPS to:

(a) Amend the RPS to more directly require compliance with the FDS; and

(b) RUB a regional plan rule such that it cannot be amended by way of a private plan change request.

7.2 These changes appear to be motivated by a perception that private plan changes approved "out of sequence" with the Future Urban Land Supply Strategy ("FULSS") have undermined the Council's ability to provide for integration of urban growth and infrastructure funding and delivery and should therefore be curtailed.

Requiring compliance with the FDS

7.3 Auckland's experience of the FULSS demonstrates that it is impossible for the Council to unilaterally control where growth occurs. Land release and development has not rolled out in accordance with the identified schedule, because it is a blunt tool that does not take into account land ownership patterns, market demand and other factors which determine how development occurs. Some flexibility is required to accommodate those factors. In this regard, the IHP on the AUP expressly decided to remove reference to a land release programme in the RPS. It said:[42]

> *"This is because the land release programme is currently not complete and therefore not available for review, there will be little public and stakeholder input as the process under which the land release programme is being prepared sits outside of the Resource Management Act 1991 and the programme represents a return to "failed growth policies of the past" and could be used as a means by the Council for constraining growth in the Future Urban Zone."*

7.4 The IHP also said:[43]

> *"The Panel thinks there is a danger that the description of the process of urbanisation in the Future Urban Land Supply Strategy will, over time, be treated as a method of controlling the process, effectively by directing when and how essential infrastructure will be provided. This*

42 *Report to Auckland Council Hearing topic 013 Urban growth* (Auckland Unitary Plan Independent Hearings Panel, July 2016) at 8..

43 *Report to Auckland Council Hearing topic 028 Future Urban Zone* (Auckland Unitary Plan Independent Hearings Panel, July 2016) at 9.

> *could inhibit or even prevent meritorious proposals for greenfield development without a full assessment of those merits."*

All of those considerations continue to apply.

7.5 Since the FULSS was promulgated, the Council has only advanced one public plan change (at Whenuapai) to give effect to the land release strategy identified. This was subsequently withdrawn. The Council has therefore resoundingly failed to advance public plan changes to release land in accordance with its own policies under the AUP and FULSS. It has relied on the private sector to do this.

7.6 Private plan changes approved have almost all been within the areas identified in the FULSS as targeted for growth and zoned FUZ by the Council through the AUP. They have typically only been inconsistent with the FULSS in terms of timing.

7.7 Any private plan change must be the subject of a rigorous Schedule 1 process under the Resource Management Act 1991 ("RMA") in which the appropriateness of the proposed zoning and the ability of the land to be serviced is thoroughly tested. Decisions on private plan changes are made by experienced Independent Commissioners appointed by the Council. Therefore, all private plan changes that have been approved have been demonstrated to give effect to the relevant statutory and planning documents and to achieve the purpose of the RMA.

Making the RUB a regional rule

7.8 The Urban Growth provisions of the RPS and the question of whether the RUB should be a regional or district rule were robustly and comprehensively debated at the AUP hearings.

7.9 The IHP considered in detail the extent to which the AUP should lock in land supply and infrastructure decisions, concluding that such a step would not be consistent with the sustainable management purpose of the RMA. It said:[44]

> *"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."*
>
> *[emphasis added]*

7.10 The IHP heard extensive economic evidence that excessively strict controls in respect of urban growth would likely have the effect of driving up prices, suppressing development and severely adversely affecting housing affordability. The IHP said:[45]

> *"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*

44 *Report to Auckland Council Overview of recommendations on the proposed Auckland Unitary Plan* (Auckland Unitary Plan Independent Hearings Panel, July 2016) at 67.

45 *Report to Auckland Council Overview of recommendations on the proposed Auckland Unitary Plan* (Auckland Unitary Plan Independent Hearings Panel, July 2016) at 67.

> *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."*

7.11 The proposal in the Draft FDS essentially represents another attempt to lock in the RUB, notwithstanding the incontrovertible findings of the IHP that such changes to the planning framework would have significant adverse effects on housing affordability and would be inconsistent with the scheme of the RMA.

7.12 No evidence has been provided to suggest that the IHP's concerns about severe adverse effects on housing affordability would not eventuate if the Draft FDS is approved. This is a major concern for FRL.

7.13 FRL strongly opposes the attempt by the Council to revisit an issue that has been comprehensively considered by the IHP and clearly resolved, following robust assessment.

8. PROPOSED REZONING OF FUZ LAND

8.1 FRL is deeply concerned that the proposal to either remove from the FUZ or "place under investigation" areas of land that are currently zoned FUZ in the AUP. The extent of the FUZ was identified by the IHP on the AUP following a comprehensive Schedule 1 process which considered all of the issues identified in the Draft FDS as reasons for review. Insufficient information has been provided to justify departure from the outcomes of that process.

8.2 Very substantial investment decisions have been made across Auckland based on the Council's decision making in this regard. In many cases, developers have advanced development proposals for their land which have now been thrown into jeopardy by the Draft FDS.

8.3 This potentially has major implications for the economic wellbeing of the development sector and all industries (civil engineers, earthworks companies, house builders, tradespeople, etc) who rely on the development sector for their business. Despite its potentially disastrous effect, the Draft FDS includes no discussion of these issues.

Natural hazards

8.4 It appears that the primary reason for proposing to remove land from the FUZ is because of concern about natural hazards, including in particular, flooding. This appears to be a reaction to recent weather events, which on closer interrogation is not justified.

8.5 Structure planning for development in greenfield locations includes comprehensive consideration of flood hazards and development is governed by Chapter E36 of the AUP which tightly controls development in flood plains.

8.6 It is clear that these provisions are working well as newer master planned communities, developed at scale in greenfield locations performed exceptionally well over the recent weather events. It was the inner city areas of Auckland, where intensification without commensurate infrastructure upgrades were permitted to occur, (which the Draft FDS proposes to intensify) which suffered.

8.7 Accordingly, there is no basis for the removal of all flood plains from the FUZ. Rather, the appropriate use of land that is subject to flood risk should be considered on a case by case basis following detailed analysis of risk that is appropriately undertaken at the structure planning and plan change stage.

Implications for Riverhead

8.8 As a member of the RLG, which is the proponent of the Riverhead South plan change, FRL has a particular interest in the approach taken to FUZ land at Riverhead. Part of the area has been identified for removal from the FUZ, with the remainder as an area "under investigation".

8.9 This land has been the subject of a detailed structure planning exercise to inform the Riverhead South Plan Change.[46] Independent consultants have comprehensively assessed the appropriateness of the land for residential development and prepared a development scheme which responds to the constraints and opportunities offered by the site.

8.10 The part of the land identified for removal from the FUZ in the Draft FDS is an area that is within the 1% annual exceedance probability (1% AEP) flood plain. As part of the structure planning exercise, detailed and updated flood modelling has been undertaken in consultation with Healthy Waters. That modelling is significantly more accurate and refined than the data previously held by the Council and has shown that the extent of the floodplain is in fact smaller than previously understood. This exercise demonstrates that it is inappropriate for the Draft FDS to seek to "lock in" decisions about the removal of land from the FUZ in the absence of complete information and detailed expert assessments.

8.11 In terms of the matters identified as reasons for placing the remainder of the land "under investigation", the Draft FDS asserts that it is appropriate to consider removing the land from the FUZ for reasons including an alleged absence of transport infrastructure to support the development, the absence of a RTN and "*the Potential for higher VKT and CO2 emissions than other FUAs due to Riverhead being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs*."[47]

8.12 In terms of transport infrastructure, the assessment (and associated infrastructure triggers) appears to have grouped Riverhead with Kumeu and Huapai. In fact, not all of the upgrades required to service Kumeu and Huapai are required to service Riverhead: they are unrelated. Specifically, it is reasonable to tie development within Riverhead to the Brigham to Waimauku SH16 upgrade, but Riverhead should not be tied to the delivery of the Alternative State Highway (Kumeu Bypass) corridor or North-west Rapid Transit extension to Huapai. These provide transport improvements to the Kumeu-Huapai area, not Riverhead.

8.13 The Integrated Transport Assessment completed to support the Riverhead Plan Change demonstrates that the short to medium term transport network can cater for the anticipated long term demands enabled by the Plan Change. The Plan Change aligns with the upgrades proposed as part of the North West long term transport network upgrades planned by the Supporting Growth Alliance, such that the effects of the network for traffic, public transport and local connectivity for all modes are catered for and provided within existing funded projects or by the developers. The extent to which there is any dispute about that is a matter for the Schedule 1 process.

46 The Planning, Environment and Parks Committee's decision to reject the plan change for processing under clause 25 of Schedule 1 has been appealed to the Environment Court.

47 *Auckland Future Development Strategy 2023-2053 - Consultation Draft* (Auckland Council, June 2023) at 34.

8.14 In terms of vehicle transport emissions, the Draft FDS appears to have been informed by transport and land-use modelling to determine the travel patterns for 554 locations across Auckland to identify the travel impacts of each growth scenario.

8.15 This analysis captured only the current snapshot (as at 2022), when many FUZ locations were not well-developed and had relatively poor balances between homes and jobs. However, structure planning for such areas, including Riverhead, has aimed to make them self-sustaining by providing a balanced provision of residential *and* business land to enable communities to "live work and play" in one location. The modelling therefore grossly overstates the likely travel impacts of FUZ areas, and indeed preventing further business development in such areas is likely to have the opposite of the desired effect, because existing residents will continue to need to travel for work and other activities.

8.16 RLG has been working collaboratively with the Council's Plans and Places team and various Council CCOs over the past two years on the proposals for the Riverhead FUZ land. RLG formally lodged the Riverhead Plan Change in July 2022 and RLG has continued to work alongside the Council as the Council has processed the Plan Change. Given this, it is disappointing that at no point over the past 12 months has the Council spoken with RLG regarding the Draft FDS proposal for the FUZ land at Riverhead. In preparing the Draft FDS, the Council appears to have no regard for the detailed specialist investigations undertaken which have been provided to them by RLG.

9. CONSULTATION PROCESS

9.1 The Draft FDS is an extremely important document which will have major implications for Auckland's future growth and wellbeing. The consultation process adopted by the Council has not reflected that importance, and FRL is concerned that when making decisions on the Draft FDS, the Council will not be properly informed of the issues.

Timing

9.2 Section 83 of the Local Government Act 2002 ("LGA 02") requires that when using the special consultative procedure, a local authority must invite views on the proposal "for a period of not less than one month." The consultation period originally provided on the Draft FDS, of one month exactly, represented the bare minimum in terms of the legislative requirements.

9.3 The extension of an additional month was obviously welcomed, but even so, is insufficient to enable a comprehensive response to be provided, particularly because there has previously been no consultation between the Council and developers in the preparation of the Draft FDS, resulting in a significant divergence in terms of understanding of the issue.

No reasonable opportunity to present views

9.4 Importantly, the Council has not provided a reasonable opportunity for submitters to present their views in a manner that is appropriate to the preferences and needs of the submitter, as required by section 82(1)(d) of the LGA 02.

9.5 The Have Your Say events are wholly inadequate to provide submitters with a reasonable opportunity to present their views in accordance with section 83(1)(d) of the LGA 02, having regard to the extensive and complex issues requiring consideration. It is impossible to convey these issues by way of a public "drop in" event.

9.6 A hearing should have been scheduled to enable submitters to properly set out their concerns.

9.7 FRL took up the opportunity to present to the Planning Environment and Parks Committee on 21 July. Despite the large number of major developers and other interested parties in attendance, FRL was disappointed to see that only six Councillors

were present at the meeting. The meeting was an important opportunity for the Committee to understand direct from developers the key issues which have been ignored or misrepresented in the Draft FDS. It is unfortunate that so many Councillors elected not to attend.

Views to be received with an open mind

9.8 FRL has received advice that the Council may be aiming to adopt the FDS in September 2023. If correct, this timeframe leaves no scope for proper consideration of submissions and the undertaking of any necessary further analysis. It also suggests that the Council is not approaching this process with an open mind, but is instead committed to approving the Draft FDS notwithstanding the major flaws identified by submitters.

10. CONCLUSION AND REQUESTS

10.1 Having regard to the above, FRL requests that the Council pauses the current programme on the Draft FDS and initiates meaningful consultation with the community, including the residential development sector, as required by Clause 3.13 of the NPS-UD.

10.2 Future work on a revised FDS should be underpinned by the following principles:

(a) Sufficient land must be released at the appropriate time to cater for growth, continuing the combination of urban consolidation, greenfield development, and the expansion of satellite townships;

(b) Land should be released at the time needed to meet the community's needs, taking into account the long timeframes to work through the Council's regulatory processes to deliver occupiable homes;

(c) Opportunities for and staging of growth needs to be considered on an area by area basis, rather than applying blanket rules across the region;

(d) The private sector should be enabled to deliver quality urban growth;

(e) Growth needs to be serviced by adequate infrastructure, which can be supplied through a broad range of options including innovative methods and participation by the private sector (investment and development);

(f) Stormwater and flood plain management are important factors and need to be considered in the release of land, but there are various methods to manage such issues; and

(g) There should be sufficient flexibility to enable departure from the future development strategy in site specific circumstances, to be responsive to new information, site specific analysis and market need. As such, the RPS does not need to be amended to preclude private plan changes which are inconsistent with the future development strategy and the RUB does not need to be a regional rule.

DATED at Auckland this 31 day of July 2023

Yours sincerely

[redacted]

ATTACHMENT A

ANALYSIS OF THE AUCKLAND COUNCIL DRAFT FUTURE DEVELOPMENT STRATEGY 2023: IMPACT ON THE PROVISION OF LAND FOR RESIDENTIAL REPORT TO FLETCHER LIVING

28 JULY 2023

TATTICO LIMITED

#8135

tattico

Analysis of the Auckland Council Draft Future Development Strategy 2023

Impact on the Provision of Land for Residential

Report to Fletcher Living

28 July 2023

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1 EXECUTIVE SUMMARY

1.1 This report has been prepared in support of a submission by Fletcher Residential Limited (Fletcher) on the Auckland Council Draft Future Development Strategy (Draft FDS).

1.2 This report focuses on the impact of the Draft FDS on the future supply of residential land to enable Auckland to meet its social and economic development needs. This analysis focuses on future urban zoned land and the requirement for a planned continuous supply of 'development ready' residential land.

1.3 The conclusions of this analysis are that:

(a) The Draft FDS fails to take adequate account of the diverse needs for residential land. Providing sufficient development ready land is essential to provide for housing to meet the social and accommodation needs of the Auckland community.

(b) The Draft FDS does not provide the area of land required in suitable locations and at the right timing for release of land.

(c) While the Draft FDS acknowledges the need for housing land in future urban areas, the reality is the Draft FDS significantly slows down the release of residential land in these areas. This constrains the supply of housing and diminishes the ability to meet the social needs of the community. It puts at risk housing affordability.

(d) The Draft FDS inappropriately relies solely on urban consolidation to provide all new residential land through until 2030. There is a need for greenfield residential land to provide housing in the north, northwest, east and south.

(e) The Draft FDS promotes a set of "principles for growth and change" with a heavy environmental focus and disproportionately less weight given to growth capacity for housing.

(f) This understating of the importance of residential development runs contrary to section 5 of the Resource Management Act 1991 (RMA) which, in association with the rest of Part 2 of the RMA, requires that decisions making under the RMA achieves a balance between cultural, environmental, social and economic outcomes essential to a sustainable community.

(g) Reinforcing this is the National Policy Statement on Urban Development (NPS-UD) which requires Council to provide a minimum of 30 years' growth for residential land, and to complete a robust "Housing and Business Development Capacity Assessment" (HBA).

(h) The Draft FDS cuts across the long established and well tested growth strategy, which was extensively securitized and developed through extensive work by the Council and engagement with the community and stakeholders.

(i) Since 2011, the Council have been promoting a balanced growth strategy for Auckland, targeting housing and employment land supply through both urban consolidation and targeted greenfield expansion. This has been consistently reinforced through the Auckland Plan, Auckland Unitary Plan, Future Urban Land Supply Strategy (FULSS) and various structure plans.

(j) The Draft FDS is wrongly based on a premise that it is more cost effective to develop brownfields than greenfield. The efficiencies of medium and large scale greenfield development give a more cost-effective way to deliver housing than an equivalent yield in a brownfields situation. This relates to the cost of retrofitting at scale an existing urban area.

(k) The current Draft FDS appears to be a reaction to constraints on natural hazards and infrastructure funding.

(l) It is accepted that the Council has financial constraints which are negatively impacting infrastructure provision. However, the solution is not to restrict greenfield development for a decade, as the FDS is proposing to do in certain areas. If the problem is funding infrastructure; then the solution is to find innovative ways to fund infrastructure.

(m) Harnessing the talent, skills and resources of the private sector to solve infrastructure problems on an area-by-area basis will support sustainable growth and can be achieved via the route of private plan changes. The blanket approach in the Draft FDS of treating every greenfield area the same, by revoking the pathway for private plan changes, will not yield the desired outcomes that council is trying to achieve and will instead hinder economic and employment growth in the region. There will be different solutions for different areas and each should be assessed on their merits.

(n) It seems Council is working from a premise that only the Council can fund infrastructure, rather than looking at mechanisms to assist in the sustainable funding and delivery of infrastructure.

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

- Further constraining housing land supply.
- Significantly and negatively impacting residential affordability through land supply constraint.
- Having a demonstrable negative impact on the social and economic development of Auckland and the development sector.

1.4 The conclusion of this analysis is that the final FDS needs to provide a significantly increased focus on and provision for housing including affordable housing. To this end, this report recommends:

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

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

(c) some key principles be agreed including:

(i) sufficient residential 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, including residential land, 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;

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

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

(e) this land be released at the time needed to meet the community's needs, taking into account the long timeframes to work through the Council and regulatory processes to deliver occupiable homes.

(f) 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;

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

2 FLETCHER SPECIFIC INTEREST

2.1 Fletcher Residential has dedicated 'land development', 'residential' and 'apartment' teams targeted with procuring and developing residential land and housing within the Auckland region.

2.2 Through its various development teams (land development, residential, apartments), Fletcher has an extensive knowledge of the Auckland market, the demand for housing and the type of living environments which Aucklanders aspire to live in. This includes both brownfield and greenfield projects.

2.3 The reality is that different people pursue different lifestyles. If the Council's aspiration is to meet the social needs of the community, then the Future Development Strategy needs to enable a broad range of housing typologies and living environments that helps people meet their needs.

2.4 This has certainly been a driver for the Fletcher programme. Fletcher has been very active in both detached dwellings, terrace house and apartment products.

2.5 It has delivered these products in a geographic spread across Auckland with extensive use and activity in the brownfields area, e.g. Three Kings, , Tamaki, Waiata Shores, Stonefields, Hobsonville Point; and in greenfield locations, e.g. Whenuapai, Drury, Red Beach.

2.6 Fletcher has in its delivery of housing programmes aligned with the Council's growth strategies. Fletcher has delivered housing to target the balance of brownfields, greenfield and provincial centre development and in a broad range of typologies ranging from downtown apartments through suburban apartments, brownfields terrace house department, brownfields detached homes and greenfield terrace and detached dwelling typologies.

2.7 Fletcher has also worked hard to deliver a broad range of product from social housing for Kainga Ora, market affordable housing, to full market housing. These have been in a range of different typologies. Fletcher has worked with different partners in this delivery including Kainga Ora, iwi authorities, partnering with the Council in the Eke Panuku land holdings, through to its own initiatives.

2.8 The Draft FDS has a significant impact on the ability of Fletcher to deliver development ready land and to construct the housing essential to the Auckland wellbeing.

2.9 This submission is intended to target across all the Auckland region and the identified greenfield development areas currently zoned Future Urban.

3 RESIDENTIAL LAND

3.1 The Draft FDS sets out a set of four spatial outcomes, namely:

- *Tāmaki Makaurau is viewed as an interconnected living system;*
- *development achieves high quality living environments;*
- *disparities in our communities and investments are addressed;*
- *development results in resilient built systems, natural environment and communities.*

3.2 The spatial outcomes themselves are laudable objectives and can and should be supported.

3.3 There is a critical omission in that, given the NPS-UD and other statutory requirements, one of the core spatial outcomes should be to provide for the growth of Auckland to meet the economic and community needs and to provide this in a manner which provides a range of lifestyle choices and affordable housing product.

3.4 The Draft FDS then goes on to identify the four key challenges faced by the Council, and from that develops a set of "principles for a quality compact approach to growth and change".

3.5 These principles are:

- *supporting greenhouse gas emission reduction;*
- *adapt to impact of climate change;*
- *make efficient and equitable infrastructure investment;*
- *protect and restore the natural environment;*
- *enable sufficient capacity for growth in the right place at the right time.*

3.6 In terms of these principles:

(a) The principles are based on an assumption of creating a quality compact approach to growth and change. This seems to be predicated on a significant over reliance on urban intensification and a substantial reduction in what has been a long-established balance strategy where urban consolidation and brownfield development has been a key component but supplemented and supported by greenfield development.

(b) There has been limited engagement with the development community over such a fundamental change and the economic and social consequences of this, including the impact on housing affordability. For reasons set out later in this report, there will inevitably be significant unintended consequences if this significant policy change is adopted.

(c) Enabling sufficient capacity of growth in the right place at the right time is created as the fifth and last principle. While principles are not necessarily listed in a hierarchical sense, it must be remembered that the NPS-UD sets a National Policy requirement for tier 1 councils (Auckland) to:

> *"(i) achieve a well-functioning urban environment in existing and future urban areas; and*
>
> *(ii) … provide at least sufficient development capacity … in the short term, medium term, and long term (up to 30 years) for:*
>
> *housing in existing and new urban areas in both standalone dwellings and attached dwellings and business land from different business sectors*." (clause 3.13 of the NPS-UD)

(d) The NPS-UD is promoting the requirement for a generous supply of housing so as to not constrain supply and therefore distort housing affordability and to provide choice for future residents. The FDS seems to lean towards a more constrained "sufficiency only" provision.

3.7 In the contextual background information, the FDS reports assert that the series of private plan changes have undermined the Council's ability to provide for an integrated development. This in the context where, as commonly agreed, the Council does have significant infrastructure budget constraints and is needing to target and prioritise spend areas.

3.8 This report elaborates further later in this report but in this context it should be recognised that:

(i) All new greenfield development funds at least the infrastructure provision within the new subdivision and area.

(ii) All new development is assessed through the resource consent process to ensure that infrastructure needs are met. Through a variety of mechanisms including development contributions and infrastructure funding agreements or other consenting requirements, infrastructure provision is provided.

(iii) The plan changes referred to have almost invariably been within the areas identified in the FULSS as targeted for growth and zoned Future Urban by the Council through the AUP.

(iv) For various reasons stated as the impact on the Council's budgets from a variety of activities including Covid and storm damage, the Council has not advanced public plan changes to release land in accordance with its own policies under the AUP and FULSS. It has relied on the private sector to do this.

(v) If the constraint is infrastructure, then the solution is to find innovative ways to work with the private sector to resolve the constraint and enable development.

3.9 The economic analysis commissioned by Fletcher would suggest that the requirement for additional greenfield land is understated, and the lack of engagement over the HBA as required under the NPS-UD, has not enabled the Draft FDS to appropriately address this. This is set out in the economic analysis by *Insight Economics*.

3.10 The Draft FDS assumes that the cost of brownfield land versus greenfield land is cheaper due to efficiencies. Fletcher with extensive experience in both brownfield and greenfield development has a different experience.

(a) At scale, the cost of developing on brownfield sites is actually much more than a greenfield site. In land development costs these are typically two to three times the cost due to the complexities of retrofitting an built up area.

(b) The Fletcher experience is that typically brownfield is more expensive because the costs of replacing old pipes and upgrading utilities, remediating contamination, higher civil and retaining costs, limitations on access, legal and title implications including fragmented land ownership, add significantly to cost.

(c) Assembling large tract of brownfield land is problematic due to existing subdivision and land ownership patters. Brownfields blocks tend to be smaller. Intensification at scale is slow, expensive, and not practicable in many places of Auckland. Where there are moderate sized blocks of residential zoned land, most of these are already committed for permanent uses such as schools (mostly zoned residential in the AUP) , retirement villages, etc. They are not realistically available for redevelopment.

(d) Greenfield offers a more efficient provision of infrastructure. That infrastructure is paid for by the development whereas in brownfield that can more fall to the Council

(e) It is recognised that greenfield can impact broader regional infrastructure costs. Obviously these need to be factored in That is why a case-by -case analysis between the Council and stakeholders of the greenfield block is warranted. This will enable management of infrastructure while providing for growth.

(f) Brownfield development does work for small infill type development and on the few large land holding blocks That will continue to contribute to Auckland's growth, but is not the full solution for providing for growth and affordable housing.

3.11 The Draft FDS associated reports identify opportunities for more efficient use of residential land. This is demonstrated in a number of urban renewal and regeneration project across the region. This analysis is fully supportive of the continuation of the planning strategies to support urban consolidation. The issue is the move away from the "balanced strategy" to an over dependence on brownfields development. The economic analysis commissioned by Fletcher demonstrates that urban consolidation needs to be supplemented with the steady release of greenfield land for development.

4 INSUFFICIENT SUPPLY OF RESIDENTIAL LAND

4.1 The Draft FDS promotes a significant urban consolidation model through until at least 2030 with no greenfield expansion.

4.2 The key areas identified for growth are shown on the diagram below. This is essentially:

- Westgate / Whenuapai;
- City centre;
- Mt Roskill
- Tamaki;
- Mangere;
- Drury.

4.3 Regeneration or even urban renewal projects in all of these areas is supported. The FDS correctly identifies the importance of brownfields development and the urban consolidation model. This has been a key plank of Auckland's growth widely supported by the industry from its inception in the Auckland Plan (and in fact through growth strategies prior to amalgamation) and reinforced through the Auckland Unitary Plan. The issue for the FDS is the degree to which, particularly for the next decade, it relies almost exclusively on the urban consolidation / brownfields development, and effectively seeks to stop any further greenfield development until at least the 2030 decade.

4.4 It should be noted that Fletcher, through its various entities, has been and is active in all six of the brownfields growth areas identified within the FDS.

4.5 Fletcher is in a major land development role in Whenuapai, Three Kings (adjacent Mt Roskill) and Drury. It is a significant residential developer in Tāmaki and Mangere. It is active in a number of projects in the Isthmus area and aspires to be active in the opportunity for urban renewal and urban regeneration projects around what will be the new station nodes when the CRL is operational.

4.6 There are various infill opportunities across the region. However the FDS should:

- Provide for a minimum of 30 years growth as required by the NPS:UD
- Be driven off a robust HBA and at all times provides more than sufficient residential land capacity, so as not to distort market prices;

- Create opportunities across the region, not just focused in a few locations;
- Enable high-quality sites that meet the housing needs.

The current FDS does not set out a strategy to achieve this. Too much development is constrained by 'timing' issues which effectively equate to infrastructure financing issues.

4.7 The Council has produced five structure plans since the FULSS was prepared.

- of these, one (Silverdale West) is solely focused on providing industrial employment land;
- The remaining four provide for residential with some level of business land;
- Apart from 3 small blocks of FUZ zoned land targeted for release in 2025+ under the new FDS timing, no other FUZ zoned land is targeted for release until 2030 at the earliest. In fact:
    - 6 blocks in 2030+
    - 17 blocks in 2035+
    - 7 blocks in 2040+
    - 3 blocks in 2045+
    - 7 blocks in 2050+
    - 10 blocks recommended for further investigation
    - 5 blocks recommended for full or partial removal
- of the other four structure plans providing for residential activity;
    - the Warkworth Structure Plan is deferred from 2018/2022 to 2040+;
    - the Drury Structure Plan is deferred from 2018/2028 to 2035+ although a large block of industrial land has been recently rezoned.;
    - the Pukekohe Structure Plan is deferred from 2018/2023 to 2035+ and 2040+;
    - the Whenuapai Structure Plan is targeted in part for the next 10 years and in part 11-30 years (FUZ zoned land) .

4.8 In each case, the reason for deferral related to matters of infrastructure (including transport) or stormwater management. None are deferred because of an assertion of a surplus of land or changed requirements for housing.

5 FDS PRINCIPLES FOR GROWTH AND CHANGE

5.1 The Draft FDS sets out the key principles which have led to the strategy.

5.2 Section 2.5 "*Principles for growth and change*" identifies the "*universal ways of accommodating growth, applicable Tāmaki Makaurau-wide, no matter what scale or spatial environment is considered".* These principles are:

- *Support greenhouse gas emission reduction*
- *Adapt to impacts of climate change*
- *Make efficient and equitable infrastructure investments*
- *Protect and restore the natural environment*
- *Enable sufficient capacity for growth in the right place at the right time*

5.3 While the Council constraints on infrastructure are recognised, the key principle for growth related infrastructure should be to invest in the provision of infrastructure to meet the social and economic needs of Auckland. It is about infrastructure being an enabler of housing, community and economic development; rather than constraining growth due to infrastructure. There needs to be a balance. What that balance is needs to be worked through. However, the key principles of the FDS should start from the premise of infrastructure as an enabler of growth.

Council's approach to reviewing future urban areas

5.4 The Council's approach to reviewing future urban areas is set out Appendix 7 to the Draft FDS. The scope of the review covered all Future Urban areas that had not been live zoned as of 2023, with the intention being to evaluate the appropriateness of areas for future growth. Consideration was given to new strategic and policy direction, new and updated data, changes to enabled development capacity.

5.5 The following key criteria were used:

- Exposure to natural hazards
- Modelled contributions to increased CO_2 emissions/vehicle kilometres travelled (VKT)
- Infrastructure timing and delays

5.6 *"Other factors"* considered were:

- High-level, indicative bulk infrastructure costs
- Committed council infrastructure
- Urban form and future business land provision
- Potential to provide key locations for future managed retreat of nearby vulnerable existing urban areas
- Presence of known sites of significance to mana whenua, Māori freehold land, commercial and cultural redress, and cultural and statutory acknowledgement areas
- Loss of highly productive land
- Impacts on the natural environment, including indigenous biodiversity and water quality.

5.7 The assessment criteria do not take into consideration factors such as the need for residential land in the area, or the existing investment in the area as an enabler of growth. Much of this investment has followed the clearly signalled growth strategy for Auckland.

5.8 Adequacy of supply of residential land is considered an "*other factor*". This does not reflect the priority the NPS:UD requires Council to give to 30 years minimum of residential growth opportunity.

5.9 The timing of when many future urban areas will be able to enable growth has changed due to updated information on deliverability of key infrastructure to support that growth.

5.10 There is an underlying theme in the Draft FDS of constraining and slowing down *Future Urban* land release, and the economic and social benefits this brings, because of infrastructure constraints. While it is accepted the FDS must be tempered by the current financial position the Council is in, for reasons set out below, if the issue is *how infrastructure is funded* so as to be an enabler of growth rather than a constraint on growth, then the FDS should be open to different and innovative ways of addressing the issue. This rather than the presumption of an unresolvable budget problem leading to a necessity to defer land release and constrain development.

6 REQUIREMENTS FOR A PLANNED SUPPLY OF LAND TO MANAGE GROWTH

6.1 The National Policy Statement on Urban Development (NPSUD) sets a legislative requirement to have a planned 30-year growth for Auckland. This is for both residential growth and business development.

6.2 The NPSUD requires tier 1, 2 and 3 local authorities (Auckland being tier 1) to "*at all times provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term and long term.*"

6.3 The strategy is targeted at both "*existing and future urban areas*" and sets a requirement to provide growth for at least 30 years.

6.4 In a recent Environment Court decision (*Middle Hill Limited v Auckland Council* 2022), the Court stated:

> *"The NPS-UD has the broad objective of ensuring that New Zealand's towns and cities are well functioning urban environments that meet the changing needs of New Zealand's diverse communities. Its emphasis is to direct local authorities to enable greater land supply and ensure that planning is responsive to changes in demand while seeking to ensure that new development capacity enabled by council is of a form and in locations that meet the diverse needs of communities and encourage well-functioning, liveable, urban environments. It also requires councils to remove overly restrictive rules that affect urban development outcomes in New Zealand's cities."*

6.5 The Auckland Plan, Auckland Unitary Plan and Future Urban Land Supply Strategy are set out to create a balanced strategy that will achieve this requirement.

6.6 The Draft FDS significantly slows down the release of residential land in the medium and long term through deferring the live zoning of Future Urban zoned land. This will only lead to a shortage of land supply which in turn will escalate land price.

6.7 The Auckland Transitional Act required the development of the Auckland Plan. This in turn set a 30-year horizon to, among other things, manage growth. This promoted a combination of existing development areas plus greenfield expansion.

6.8 The first iteration of this work was the Auckland Unitary Plan (AUP) which provided for a level of appropriate development, both live zoned and zoned for future urban development.

6.9 This was then complemented by the FULSS of 2017 which informed the direction and location of growth, particularly for the future urban areas identified within the AUP.

6.10 The key issue with the FULSS has been the implementation of this strategy.

6.11 The long-established development scenario set effectively in 2011 has been:

- a 'spatial plan' that provides a 30-year strategy for the development of Auckland and its communities that integrates social, economic, environmental and cultural objectives (the Auckland Plan) - completed;
- identification of a resource management strategy which among other things identified areas of future urban zoned land (the AUP) - completed;
- identification of key growth areas to be live zoned over time (the FULSS) – completed.
- development of a structure plan for key growth areas – 5 structure plans have been completed, with no other ones currently proposed;
- implementation of the necessary plan changes to give effect to these developments - only one public plan change advanced, even that was withdrawn by Council. 18 private plan changes advanced.

6.12 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.

(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) Council has failed to deliver a single private plan change.

(vi) This has delivered additional growth for Auckland.

(vii) To the best of Fletcher'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.

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

6.13 With some changes, the FULSS could simply be updated for the next Long Term Plan (LTP), rather than pushing through an FDS based on incomplete information. The FDS is such a critical development tool and has a huge implication on:

- land supply,
- housing affordability
- social development
- economic development,

It is essential that any review of the FDS is a fully researched, worked through and tested strategy prior to adoption.

7 LAND SUPPLY AND HOUSING AFFORDABILITY

7.1 The key lesson of the 2000s and mid-2010s is that constraining land supply raises land value expectations in the current owners. This 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.

7.2 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.

7.3 The *Insight Economics* report commissioned by Fletchers addresses the impact of the the Draft FDS on residential housing supply, affordability and consumer choice. That work is not repeated in this report but is relevant to the conclusions of this planning analysis. In particular the report identifies:

(a) The importance of the balanced strategy providing for both brownfield and greenfield.
(b) The issues with an over reliance on brownfields to solve all Auckland's growth.
(c) The availability of brownfield land being not necessarily bin the right locations.
(d) the connection between land supply and housing affordability.
(e) The view that the Draft FDS significantly overstates the infill housing opportunity for growth in terms of realistic availability.
(f) The importance of offering housing choice in terms of location and typologies to residents

7.4 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.

8 UNDERSTANDING THE TIMEFRAMES TO GET LAND DEVELOPMENT READY

8.1 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.

8.2 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 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.

8.3 These are realistic, if slightly optimistic, timeframes. Very few projects would hit good timeframes at every stage.

8.4 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.

9 SUPPORT FOR THE CONCEPT OF A FUTURE DEVELOPMENT STRATEGY (FDS)

9.1 This analysis supports the concept of having a Future Development Strategy; but does not support the published draft approach.

9.2 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 industry in the locations that work best from an economic, social and environmental perspective.

9.3 The 2017 Future Urban Land Supply Strategy (FULSS) has worked reasonably well in informing and directing the location of growth, albeit that the strategy has not been responsive enough to the keep up with the pace of growth.

9.4 An update of the FULSS through the FDS is a sound objective and is supported. Six years on, the FULSS does need an update. However, this needs to be a planned, considered, comprehensive upgrade; rather than a rushed reaction to a series of events.

9.5 It is accepted that there are financial infrastructure constraints facing Auckland, and therefore the direction and pace of growth needs to be clearly signalled by the Council to assist in the logical and sequential development of appropriate parts of the urban area of Auckland.

9.6 The FDS is the right thing to do; but the strategy embodied within the Draft FDS is not.

10 A BETTER WAY TO SOLVE INFRASTRUCTURE

10.1 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.

10.2 The critical issue in this Draft FDS is that the need for employment land and housing land does not cease until the Council's financial position rectifies itself.

10.3 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.

10.4 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.

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

10.6 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.

10.7 The Council needs to explore options including:

(i) private sector funding of key infrastructure to enable at least early stages of growth;

(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 Draft 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.

11 RIVERHEAD CASE STUDY

11.1 Fletcher is a member of the Riverhead Landowners Group ("RLG"), which is the proponent of the Riverhead South plan change, Fletcher has a particular interest in the approach taken to FUZ land at Riverhead. Part of the area has been identified for removal from the FUZ in the Draft FDS, with the remainder as an area "under investigation".

11.2 This land has been the subject of detailed structure planning exercise to inform the Riverhead South plan change. Independent consultants have comprehensively assessed the appropriateness of the land for residential development and prepared a development scheme which responds to the constraints and opportunities offered by the site.

11.3 The part of the land identified for removal from the FUZ in the Draft FDS is an area that is within the 1% annual exceedance probability (1% AEP) flood plain. A comprehensive Stormwater Management Plan is included as part of the Structure Plan and Plan Change. As part of the structure planning exercise, detailed flood modelling has been undertaken in consultation with Healthy Waters. That modelling is significantly more accurate and refined than the data previously held by the Council and has shown that the extent of the floodplain is in fact smaller than previously understood. This exercise demonstrates that it is inappropriate for the Draft FDS to seek to "lock in" decisions about the removal of land from the FUZ in the absence of complete information.

11.4 In terms of the matters identified as reasons for placing the remainder of the land "under investigation", the Draft FDS asserts that it is appropriate to consider removing the land from the FUZ for reasons including an alleged absence of transport infrastructure to support the development, the absence of a rapid transit network and "the Potential for higher VKT and CO2 emissions than other FUAs due to Riverhead being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs."[1]

11.5 In terms of transport infrastructure, the assessment (and associated infrastructure triggers) appears to have grouped Riverhead with Kumeu and Huapai. In fact, not all of the upgrades required to service Kumeu and Huapai are required to service Riverhead: they are unrelated. Specifically, it is reasonable

1 Draft FDS, Appendix page 34.

to tie development within Riverhead to the Brigham to Waimauku SH16 upgrade, but Riverhead should not be tied to the delivery of the Alternative State Highway (Kumeu Bypass) corridor or North-west Rapid Transit extension to Huapai. These provide transport improvements to the Kumeu-Huapai area, not Riverhead. This is addressed in the report of *FLOW*

11.6 The Integrated Transport Assessment completed to support the Riverhead Plan Change demonstrates that the short to medium term transport network can cater for the anticipated long term demands enabled by the Plan Change. The Plan Change aligns with the upgrades proposed as part of the North West long term transport network upgrades planned by the Supporting Growth Alliance, such that the effects of the network for traffic, public transport and local connectivity for all modes are catered for and provided within existing funded projects or by the developers. Moreover, Riverhead and the Kumeu areas are located nearby the existing main trunk north rail line, with the opportunity to extend commuter rail from Swanson through to Kumeu to assist the existing communities and manage the transport network. The extent to which there is any dispute about that is a matter for the Schedule 1 process.

11.7 In terms of vehicle transport emissions, the Draft FDS appears to have been informed by transport and land-use modelling to determine the travel patterns for 554 locations across Auckland to identify the travel impacts of each growth scenario.

11.8 This analysis captured only the current snapshot (as at 2022), when many FUZ locations were not well-developed and had relatively poor balances between homes and jobs. However, structure planning for such areas, including Riverhead, has aimed to make them self-sustaining by providing a balanced provision of residential and business land to enable communities to "live work and play" in one location. The modelling therefore grossly overstates the likely travel impacts of FUZ areas, and indeed preventing further business development in such areas is likely to have the opposite of the desired effect, because existing residents will continue to need to travel for work and other activities.

12 NATURAL HAZARDS ARE ALREADY ADEQUATELY CONTROLLED

12.1 The FDS states that delaying development of some Future Urban zoned land is in part a response to the significant weather events and flooding and stormwater issues following the January and February storm events in Auckland.

12.2 There is no debate that land developed for residential 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.

12.3 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.

12.4 There is no urgency to hurry through this Draft FDS for reasons of natural hazards. The existing legislative regime and AUP provisions provide all the safeguards needed.

12.5 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. It is understood those areas developed under the current AUP controls were relatively unimpacted by the storm events.

12.6 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.

13 PLAN CHANGE 78

13.1 The Draft FDS seems to rely heavily on Plan Change 78 to provide for growth in the short term. Plan Change 78 in turn relies heavily on the Resource Management Amendment Act 2022. However the Council has recently deferred the timing on plan change 78 by one year.

13.2 It is inappropriate and unwise to rely on a plan change which is still yet to have its hearing stage.

13.3 There must also be uncertainty as to the future of the plan change given the divergent political views at national level over the degree of compulsion and how best to manage growth.

13.4 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.

14 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)

14.1 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.

14.2 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:[2]

"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."

14.3 The reasons why the Council's suggestion of a regional rule was 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.

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

14.4 The community has effectively relied on the private sector to implement the plan changes necessary to give effect to the FULSS and associated structure plans. 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. No public plan changes have been promoted that would give effect to the current growth strategy. Every greenfield development has relied on a private sector initiative and a private plan change.

14.5 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, a more effective and practical approach is to work collaboratively with the private sector to facilitate a blend of public and private plan changes to implement the Council's growth strategy.

14.6 The issues that were addressed by the AUP IHP regarding the risks of under-supply of residential land remain and the Draft FDS does not address these. There is a major risk that the Draft FDS will have a very significant negative impact on urban land pricing and consequently, housing affordability.

15 RECOMMENDATIONS

15.1 It is suggested the Fletcher submission seek the following next steps from the Council:

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

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

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

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

(e) this land be released at the time needed to meet the community's needs, taking into account the long timeframes to work through the Council and regulatory processes to deliver occupiable homes.

(f) 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;

(g) retain changes to the RUB as a district control matter;

(h) 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;

(i) 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.

ATTACHMENT B

ECONOMIC REVIEW OF AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY (FDS)

27 JULY 2023

INSIGHT ECONOMICS

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#8135



Final Report: 27 July 2023

Economic Review of Auckland Council's Draft Future Development Strategy (FDS)

Prepared for: **Fulton Hogan Land Development & Fletcher Building**

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1. Executive Summary

Scope & Purpose of Report

This report peer reviews Auckland Council's (**AC**'s) *Draft Future Urban Development Strategy* (**FDS**) from an economics perspective, particularly the underlying assessment of options in its *Growth Scenarios Evidence Report* (**GSER**). It focuses on the rationale for, and likely effects of, proposed major reductions in Future Urban Zone (**FUZ**) land due to alleged greenhouse gas (**GHG**) impacts.

Background

The Auckland Plan 2050's development strategy is the region's current blueprint for growth, which reflects the culmination of many years' close collaboration by all stakeholders. The FDS, however, signals a wholesale departure from this. Given the tremendous time and effort taken to forge the current approach, the evidential threshold for any proposed new strategic direction – like the FDS – is necessarily high. In our view, though, the research and analysis underpinning the FDS is materially deficient and well short of that standard. This report explains our position by describing several serious issues with the multicriteria analysis (**MCA**) of growth options underpinning the FDS.

Key Findings – Scenario Definition

The first step in an MCA is to define the options for assessment. Typically, there are three or four options, one of which is the status quo, so that any proposed changes can be readily assessed. The FDS' scenario definitions, however, are unorthodox and puzzling. First, they include an unrealistic, utopian scenario – based on a totally different set of transport and infrastructure assumptions – that forms a fictional benchmark against which the other scenarios are unduly assessed. In addition, another scenario reflects a highly dispersed urban form that also makes no sense. Consequently, two of the four scenarios are implausible and become unnecessary distractions. Moreover, no scenarios represent the status quo, which dramatically reduces the overall utility of the analysis.

Key Findings – Evaluation Criteria

The criteria used to assess options are also problematic because:

- They ignore common ground and focus only on option differences. This distorts the scale of reported option differences, while omitting key criteria because they were deemed as areas of common ground. Conversely, by including all criteria in the assessment, a full picture of option similarities *and* differences could have emerged to enable better-informed decisions.

- The criteria fixate on travel impacts despite future travel mostly being "baked in" due to the current population and existing urban form. In addition, the MCA's focus on car-based travel grossly overstates its role in GHG emissions, while ignoring the current, rapid shift towards lower emissions vehicles. At the same time, the analysis of FUZ GHG emissions is flawed because it reflects only the current situation, not each FUZ area's future state, where they are designed to operate in a largely self-sustaining manner (as per their structure plans).

- Finally, the criteria overlook the likely adverse effects of intensification, while largely ignoring key criteria in the NPS-UD, such as the need to promote competition in markets, while boosting housing choice and improving affordability.

Key Findings – Option Scoring & Weighting

We also hold grave concerns about the MCA's approach to scoring/weighting because:

- It relies intrinsically on a model whose inputs, throughputs, and outputs appear unreliable. In addition, many criteria are scored primarily by an unnamed panel of Council and CCO experts, without any real input from other key stakeholders, particularly FUZ landowners.

- 10 of the 29 criteria are assessed via very narrow and specific measures that belie the broader scope of the overarching criteria and distort likely option merits and effects.

- In addition, the scores for many criteria defy the reported outputs of the model and/or differ significantly from the preceding commentary and analysis.

- The decision not to weight criteria directly elevates the importance of some factors while systematically downplaying others. This is because, absent weights, the more criteria per theme, the greater the weight afforded it, and vice versa. And, in the MCA, one theme – travel impacts and accessibility – had 10 criteria, while other themes had only two.

Key Findings – Consideration of Capacity Sufficiency

The MCA pays little attention to the sufficiency of business and residential capacity and instead relies mainly on the theoretical, plan-enabled capacity of PC78. This seems inappropriate because:

- PC78 is on hold and, if it is later withdrawn or revised substantially, there will be major implications for capacity sufficiency, but this is not acknowledged in the FDS. Moreover, plan-enabled capacity has no real-world meaning, so relying on it here is unsound.

- PC78's capacity uplifts are inversely proportional to the density already enabled by the AUP, so it significantly boosts capacity in peripheral locations while having little impact in and around centres, where higher density is already permitted by the AUP. Thus, while PC78 enables unprecedented levels of plan-enabled capacity, much of it is poorly located.

- Capacity serviceability is not properly assessed, with the MCA merely assuming that all plan-enabled capacity is technically feasible to service. That may not be the case for (say) replacing water or wastewater trunk mains in densely populated existing urban areas, where the resulting cost and disruption may render it untenable.

- Similarly, feasibility and uptake assume a continuation of the past. However, financial feasibility has changed profoundly, and many of the best intensification opportunities have already been taken up (with remaining thus ones being more marginal overall). Consequently, the assumption that the past will simply continue is not well-founded.

- Finally, the assessment pays almost no attention to business land needs and instead simply notes that at least 1,000 hectares of business land will likely be needed in the FUZ. That aside, it largely remains silent on this critical piece of the capacity puzzle.

Key Findings – Impacts on Choice & Competition

The MCA also fails to adequately consider impacts on key NPS-UD directives, such as promoting competition in markets, and ensuring greater housing choice and improved affordability. Instead, the evaluation zooms in to fixate on other factors that supposedly contribute to "well-functioning urban environments" (**WFUE**). While that is AC's prerogative, the FDS seems to place undue weight on these other elements of WFUE while losing sight of economic factors.

The potential downzoning of large swathes of FUZ land is a particular concern because it will erode competition. Indeed, without a strong and ongoing supply of new urban land in strategically chosen locations (like the FUZ), the competitive operation of the region's urban land market will be compromised. At the same time, this FDS does not reflect the community's preferences. According to a survey conducted for PC78, "infrastructure that can cope" matters the most to Aucklanders when planning for more housing. This will be even more important now after the devastating effects of the anniversary weekend floods and Cyclone Gabrielle. Together, these events revealed major vulnerabilities in the region's three waters network and highlighted the risk of excessive intensification (i.e. creating too much impervious surface area in concentrated locations).

Key Findings – Deriving the FDS from the MCA

Lastly, the methodology used to translate the MCA into the FDS' preferred scenario is unclear. Rather than selecting the best-performing option from the MCA, as is usually done, the FDS instead creates a new, hybrid option that lacks any meaningful detail or explanation. In doing so, we consider the FDS to have erred because:

- More than half of all MCA scores (56%) were negative. According to the GSER, these negative scores "indicate the need for a specific policy intervention in addition to, or even instead of, land use or transport interventions alone." However, the FDS does not explain how it reflects or responds to the need for additional interventions to achieve its objectives.

- The FDS has not properly considered Infrastructure implications and instead deems intensification better due to allegedly lower public costs. We disagree. First, most growth-related infrastructure is funded directly by developers, and does not draw on public funds. Second, as already noted, the cost of (eventually) upgrading infrastructure networks in some existing areas could be prohibitively expensive and/or cause unacceptable disruption. Third, the "modelled" differences in infrastructure cost are much less than the MCA scores, commentary, and conclusions suggest. Accordingly, it is difficult to have any faith that the FDS has properly considered infrastructure implications when deriving its preferred scenario.

- Finally. The FDS' desire to spatially align new jobs with new homes implicitly assumes that existing urban areas work best because they let new homes reside near existing employment areas. However, this overlooks the fact that many existing employment areas are nearly fully built-out. Accordingly, new business land will still also be required in the FUZ to keep pace with residential growth and ensure appropriate balances between homes and jobs. Again, however, the FDS' proposal to slash the FUZ does not seem to reflect this.

Overall, we strongly reject the MCA underlying the FDS and urge a complete rethink.

2. Introduction

2.1 Purpose of Report

This report peer reviews Auckland Council's (**AC**'s) *Draft Future Urban Development Strategy* (**FDS**) from an economics perspective, particularly the assessment of options in its *Growth Scenarios Evidence Report* (**GSER**).[1] For brevity, this report addresses only the most substantive issues arising, with a specific focus on the rationale for, and potential effects of, the proposed downzoning of large tracts of Future Urban Zone (**FUZ**) land due to alleged greenhouse gas (**GHG**) emissions impacts.

2.2 Background

Auckland is New Zealand's largest region by far, accounting for a third of its population, and a similar (or higher) share of total economic activity. While population growth slowed temporarily due to the pandemic's effect on migration, strong and sustained growth is still forecast well into the future.

In fact, the latest projections indicate the need for at least another 200,000 homes over the next 30 years, which is more than the current sizes of Hamilton, Tauranga, Dunedin, Queenstown, and Invercargill combined. Solid employment growth is also expected. So, there is still a challenge to ensure that enough homes of the right types and sizes are provided in the right places at the right time to keep pace with demand well into the long term.

The need to plan for strong and sustained population and economic growth is nothing new, though, with the region's current growth blueprint embedded in The Auckland Plan 2050's development strategy. It reflects the culmination of several years' concerted and collaborative effort by AC, local developers, and other key stakeholders (such as central Government and infrastructure providers).

The FDS, however, signals a wholesale departure from the current evidence-based approach to accommodating growth, including the proposed deletion of entire FUZ areas in flood-prone locations, with large chunks of FUZ areas elsewhere placed in limbo pending further investigation.

Given the overwhelming time and resource expended to agree the current approach, as per the Auckland Plan 2050, any proposal to depart from that – like the FDS – must be supported by comprehensive and exhaustive research and analysis that clearly spells out the case for change and proves that the FDS is a superior way forward.

In our opinion, however, the research and analysis underpinning the FDS – particularly its evaluation of different growth scenarios – is materially deficient and falls well short of the evidential threshold that one would rightfully expect given the circumstances.

2.3 Key Issues Addressed & Report Structure

This report focusses on the following aspects of the FDS's growth options assessment, which follow the key steps in the underlying multicriteria assessment (**MCA**):

[1] Available here https://akhaveyoursay.aucklandcouncil.govt.nz/85613/widgets/408922/documents/261986

1. **Option Definition**: The process of identifying and evaluating scenarios is unorthodox and potentially misleading. It incorporates a "utopian" hypothetical option that becomes a fictional benchmark against which the other scenarios are unfairly assessed (**section 3**).

2. **Criteria Identification**: The criteria are not well formulated, and place far too much emphasis on vehicle kilometres travelled (**VKT**) despite the widely-known limited ability for land use controls to materially affect GHG emissions (**section 4**).

3. **Option Scoring & Weighting:** The scoring and weighting of growth options in the MCA appears to skew the assessment towards those that match the FDS' new growth narrative (**section 5**).

4. **Consideration of capacity sufficiency:** The analysis errantly relies on plan enabled capacity, rather than feasible or likely realisable, when assessing the need for - and merits of – the FUZ (**section 6**).

5. **Impacts on Competition, Choice & Affordability**: The analysis pays little attention to impacts on key NPS-UD issues, such as land market competition, plus housing choice and affordability, despite the FDS being a key vehicle for helping achieve such objectives (**section 7**).

6. **Derivation of Preferred Strategic Direction**: Finally, the methodology used to translate the options analysis into the FDS' preferred/composite scenario is unclear and raises many unanswered questions (**section 8**).

3. Scenario Definition

3.1 Introduction

The first step in an MCA is to define the options for assessment. Typically, there are three to four options, with one being the status quo, so that any proposed changes can be readily compared to the current course of action. However, the FDS' approach to option definition is unorthodox and the resulting set of options raises many issues, as set out below.

3.2 Inclusion of Implausible/Extreme Scenarios

The process used to derive the four options and their associated characteristics is slightly unclear, but it has a major bearing on the overall direction and likely findings of the analysis. Of particular concern is the inclusion of an unrealistic benchmark scenario (Scenario A) that assumes different development patterns, home and job locations, and travel habits to the other three scenarios, but which are often masked or not properly acknowledged, causing the other three scenarios to be unfairly assessed.

For example, the executive summary of the GSER simply notes that "four growth options were developed, representing different spatial options for land use, accommodating a consistent quantum of Auckland's growth and change in dwellings and jobs over the next 30 years."[2] Similarly, on page 5, the report goes on to further state that: "four alternative growth scenarios were developed, each representing a different urban form."[3] Clearly, these descriptions imply that the four scenarios are equally plausible but differ (mainly) in their associated urban forms. However, that is not the case.

The fundamental differences between Scenario A and the other three becomes clearer throughout the rest of the document, with numerous obscured soundbites adding important context. For example, the following comment is buried amongst the detail on page 8:

> *"The evaluation found little difference between the scenarios in terms of model outputs relating to travel behaviour, except for Scenario A which…deliberately [included] significant shifts in land use patterns and transport assumptions."*[4]

Digging deeper, I discovered that even the process for deriving Scenario A differed from the others. Specifically, page 12 of the GSER acknowledges that the first three scenarios were derived via workshops held with subject matter experts. Scenario A, conversely, was derived during the development of the Transport Emissions Reduction Pathway (**TERP**) by a smaller subject matter expert group to "reflect a spatial distribution world where climate mitigation and adaptation interventions and land use planning were prioritised over other goals and objectives for the region."[5]

[2] GSER, page 4
[3] GSER, page 5
[4] GSER, page 8
[5] GSER, page 13

This hypothetical fourth scenario (derived by a smaller number of experts outside the workshops held specifically for that purpose) makes many unrealistic assumptions that render it a poor benchmark for evaluating other scenarios.

For example:

- Scenario A Incorporates fundamentally different, unsubstantiated transport assumptions that defy any like-for-like comparison with the other scenarios, including that:[6]
    - People with office jobs work from home 1 day per week (which is about triple the rate assumed for the other three scenarios); and
    - Public transport fares are $2 per trip forever (regardless of trip length/mode); and
    - The uptake of active travel modes is much greater than in the other scenarios.
- Plus, Scenario A assumes much higher levels of job and housing growth "to enable the model to make more decisions on uptake of development capacity including providing a significantly more mixed-use environment to support more dispersed employment locations".[7] Consequently, scenario A assumes much closer spatial matches between the locations of new jobs and new homes than the other scenarios, which directly bolsters its modelled travel benefits.[8]
- Scenario A assumes that relatively high-density development will occur throughout the region, even in remote rural areas, with 80% of future dwellings in rural nodes expected to be "attached" versus only 20% currently.[9]
- In addition, it features a superior public transport network with greater network reach and higher service frequency.
- Finally, Scenario A omnipotently withdraws capacity outside areas for intensification "as a way to influence the model to respond according with the scenario narrative."[10]

Because of these key differences in foundational assumptions, Scenario A is neither plausible nor realistic, so including it is inappropriate as it sets an unfair benchmark against which other scenarios are assessed. Interestingly, even the report itself appears to acknowledge the limited inferential value of this scenario, with the following admission made on page 28:

[6] GSER, page 19

[7] GSER, page 13

[8] This can be seen on page 15, where the assumed locations of new jobs and homes is almost perfectly spatially aligned in Scenario A compared to the other scenarios.

[9] GSER, page 20

[10] GSER, page 13

Figure 1: Excerpt from Page 28 of the GSER

> Overall, Scenario A performed the best across most criteria. Scenario A was specifically developed with significant shifts in land use planning and transport assumptions to better reflect the expectations of the TERP[8], to test whether modelled travel behaviour, mode share and especially transport greenhouse gas emissions would change compared with other scenarios. As such, the fact that Scenario A performed better provides some important lessons but does not necessarily provide the solution for spatial planning. However, these differences also makes it challenging to compare outputs on a like-for-like basis with the other scenarios, particularly when trying to identify the land use, transport, model input or other reason for these differences. The findings from the evaluation of Scenario A and the other three scenarios inform the spatial component of the Future Development Strategy.

In our view, the inclusion of Scenario A has significantly clouded the overall assessment of options and appears to reveal the degree to which some participants have "pushed the envelope" towards an ideologically preferred outcome. Despite all that, Scenario A still did not achieve the ambitious emissions reductions sought via the TERP[11] which, in our view, highlights the risk and futility of focussing too strongly on GHG emissions in developing the FDS.

In a similar vein, scenario D makes little sense because it reflects a highly dispersed urban form that also veers from the current agreed approach and thus is not credible. For context, scenario D sees only 52% of new homes being built inside existing urban areas, with 48% in the FUZ and rural areas. This too is a wholesale departure from the agreed "70/40" split underpinning the current strategy and therefore also has no plausible, real-world basis.

Coupled with the fanciful nature of Scenario A, the unusual spatial definition of Scenario D means that two of the four options are non-starters for determining the best way to accommodate growth in homes and jobs over time.

3.3 Absence of Status Quo Option

Not only is the assessment compromised by the inclusion of two unrealistic scenarios (A & D), which needlessly consume analytical resources while bloating FDS reporting, but there is also no scenario representing the status quo. This is unusual, because the default course of action for virtually any option assessment is to simply "do nothing" and carry on as-is. Absent such an option in the assessment, it is impossible to compare the potential impacts of proposed new directions to the current, evidence-based future development trajectory.

For the record, we note that Scenario C is the closest match to the status quo, but it also includes a series of undocumented adjustments that obscure any efforts to reconcile the proposed new strategic direction with the current agreed one.

[11] See page 31 of the GSER.

4. Evaluation Criteria

4.1 Introduction & List of Criteria

This section addresses several critical issues related to the criteria selected to evaluate options. For ease of reference, the table below lists the 29 criteria in the growth options MCA, which we have grouped according to the key themes emerging.

Table 1: Criteria in Growth Options MCA (grouped by perceived key themes)

Travel Impacts/Accessibility (11 criteria)
Degree to which essential social infrastructure/employment is accessible by multiple modes in high dep. areas
Extent to which education is accessible by different modes (public transport + active modes)
Extent to which employment opportunities are aligned with areas of population growth
Extent to which household living costs can be reduced by increased proximity to employment opportunities
Extent to which key areas of economic activity are accessible by different modes (public transport + active modes)
Extent to which population is exposed to harmful air emissions
Extent to which rural production areas are accessible
Extent to which scenarios promote mixed use communities to reduce travel distances and safety risks
Extent to which scenarios provide improved, inclusive, & equitable access to social infrastructure & public spaces
Extent to which travel times are reliable
The extent to which scenarios impact carbon emissions
Environment (4 criteria)
Extent to which development promotes the restoration/connectivity of indigenous biodiversity
Extent to which development provides opportunities to improve the health of natural wetlands (brownfields)
Extent to which development provides opportunities to improve the health of natural wetlands (greenfields)
Extent to which options reduce the ability to swim safely and collect shellfish
Land & Housing Markets (4 criteria)
Extent to which growth creates greater housing choice to meet projected demand
Extent to which physical constraints increase the cost of development
Extent to which suitable land is available for Group 1 (land extensive) industries
Extent to which the market is likely to respond to the proposed land use pattern
Social/Culture/Heritage (2 criteria)
Extent to which scenarios are likely to result in improved levels of access to quality open space
Extent to which scenarios retain qualities of historic heritage places and values
Economy (2 criteria)
Extent to which opportunities for the agglomeration of similar/dependent industries are provided
The degree to which urban development consumes highly productive soils
Infrastructure (2 criteria)
Extent to which scenarios support current committed infrastructure
The extent to which scenarios result in measurable public monetary costs or losses over time from infrastructure
Māori (2 criteria)
Extent of Māori land within growth areas
Extent to which scenarios impact on Māori cultural landscapes
Natural hazards/Climate adaptation (2 criteria)
The extent of new urban development areas in 100-year floodplains (brownfields)
The extent of new urban development areas in 100-year floodplains (greenfields)

We now discuss several substantive concerns arising from the breadth and depth of these criteria.

4.2 Circularity Between Options & Criteria

The criteria used to assess FDS options reflect the collective input of many stakeholders, particularly the expert group convened to evaluate options. While that is fine, the overall process for deriving the assessment criteria is unclear and has resulted in a troublesome circularity between the scenarios and the criteria evaluating them. For example, page 8 of the GSER states:

> *"While the scores provide a useful indicator of the relativities between the scenarios, there was a strong inter-relationship between the scenarios and the criteria they are measured against. Therefore, the findings drawn from the results of the evaluation are thematic."*

This circularity between options and scores, and the resulting thematic nature of the results, is unusual and highly misleading. The criteria should be derived independently from the options to avoid potential bias, especially when the scores derived in the MCA depend on experts exercising their professional judgement in insolation (evidently) at remote, independent evaluation sessions.

4.3 Decision to Ignore Common Ground

Another issue with the evaluation criteria is the unusual decision to ignore common ground and focus only on option differences. Specifically, page 21 of the GSER lists various evaluation themes (i.e. criteria), which were initially deemed important, but then many are disregarded entirely or considered only fleetingly because the evaluators decided to look only at points of difference. In the words of the report:[12]

> *"Having considered the range of criteria identified, it was then determined that only criteria that would differentiate the scenarios should be taken through into the evaluation process."*

While option differences may be of greater analytical interest than commonalities, omitting criteria where options perform similarly systematically distorts the scale of reported option differences. Conversely, by including all criteria in the assessment, even those where options are expected to perform equally, readers can gain a full picture of option similarities *and* differences.

At the same time, focussing only on differences has meant that several key criteria are not covered in any meaningful detail (presumably because they were deemed by evaluators as areas of common ground), including: [13]

- Development feasibility;
- Housing affordability; and
- Ensuring there is enough land for business.

In our view, the GSER unhelpfully focusses on a carefully curated set of criteria that are designed to amplify option differences while simultaneously masking a high degree of common ground. Overall, this is an unhelpful and misleading way to frame the analysis.

[12] GSER, page 22

[13] See the list of initial criteria themes in Box 3 on page 22 of the GSER.

4.4 Undue Fixation on Travel Impacts & Accessibility

Transport has always been an important consideration to help determine where and when to enable growth in the population and the economy over time, particularly access to public transport and potential for active travel. That said, the FDS appears to place excess weight on travel accessibility and its impacts, particularly since the MCA has no criteria weightings.[14] Absent such weights, the more criteria there are per theme, the greater the weight that theme carries in the assessment.

As per the table above, transport impacts and accessibility – as we have categorised them – account for 11 of 29 criteria (or 38%), compared to only two criteria for natural hazards and climate change adaptation/mitigation (7%). This means that transport and accessibility effects receive more than five times the weight of climate change adaptation and mitigation effects in the growth options assessment (i.e 38% vs 7%). While transport impacts and accessibility *are* important, the FDS's fixation on them is a concern for the reasons set out below.

4.4.1 Future Travel & Emissions are Mostly Baked-In

Auckland's future spatial form, and thus its future transport emissions, are already largely baked-in due to its existing population and economic activity, with growth therefore having only marginal effects overall. This is a key finding of the FDS, which states the below in its executive summary:[15]

> *"Most of Auckland's future spatial form already exists and growth has limited influence."*

Later, on the same page, it elaborates that:[16]

> *"Key destinations for household trips, such as employment areas and education facilities, are well established, so changing the location of future dwellings (e.g. adding more origins) does not materially affect existing travel patterns other than reinforcing them by adding more trips."*

Indeed, with 1.7 million existing residents, the region's spatial form is mostly "baked-in" with growth representing only small changes. Consequently, focussing on marginal changes in $C0_2$ emissions between growth options, while placing little weight on other important factors, seems inappropriate and ultimately unhelpful.

4.4.2 Cars Account for Only a Small Share of Total CO_2 Emissions Anyway

Not only will the FDS have trivial impacts on the region's future emissions profile, but light passenger vehicles (i.e. cars) also account for only a modest fraction of national CO_2 emissions anyway. This is illustrated in the table below from the latest Greenhouse Gas Inventory (published in 2023).[17] It shows that cars produce only 8% of total (gross) CO_2 emissions, and hence that policies aimed at curbing GHG emissions from cars will have limited impacts on meeting national emissions targets.

[14] GSER, page 21
[15] GSER, page 8
[16] GSER, page 8
[17] https://www.mfe.govt.nz/climate-change/state-of-our-atmosphere-and-climate/new-zealands-greenhouse-gas-inventory

Table 2: Shares of Gross $C0_2$ Emissions by Group in 2021

Emitter Groups	$C0_2$ Emissions Shares
Agriculture	49%
Manufacturing	8%
Energy Producing Industries	7%
Industrial Processes	6%
Other Productive Sectors	6%
Road Transport - Cars	8%
Road Transport - LCVs	3%
Road Transport - HCVs	5%
Other Transport	2%
Waste/Tokelau	4%
Fugitive Fuel Emissions	1%
Total	**100%**

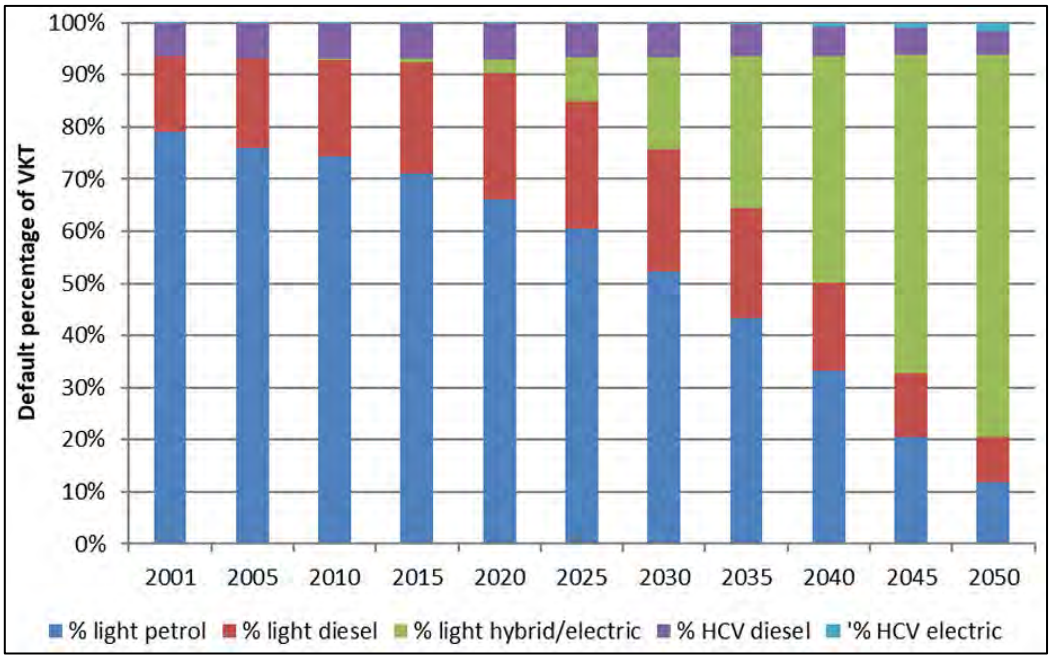
4.4.3 Car CO_2 Emissions Are Falling Rapidly Already

Not only do cars account for a slim share of national CO_2 emissions, but the average CO_2 emissions of cars is already falling due to rapid shifts towards electric, hybrid, and other low-emissions vehicles. This is illustrated in the chart below, which shows the projected composition of future VKT according in the Vehicle Emissions Prediction Model (**VEPM**), developed jointly by Waka Kotahi (**WK**) and AC.

In the graph below, the:[18]

- Blue segments represent the share of total VKT by petrol-powered cars, and
- Green segments represent the share of total VKT by hybrid and fully electric vehicles.

Figure 2: Historic & Projected Shares of VKT by Vehicle Type and Motive Power



[18] https://www.nzta.govt.nz/assets/Highways-Information-Portal/Technical-disciplines/Air-quality/Planning-and-assessment/Vehicle-emissions-prediction-model/VEPM-6.3-technical-report-2022.pdf

Figure 2 above shows that petrol-powered cars accounted for nearly 80% of total VKT in 2001, but will reach about 60% by 2025. By 2050, petrol cars will account for just over 10% of total VKT, with hybrid and electric cars accounting for more than 70%. Given this rapid background trend, it follows that trying to reduce Co2 emissions via the spatial location of new jobs and homes will have very little impact overall and thus is not an appropriate primary focus for the FDS.

Interestingly, the relative importance of fleet electrification, and the limited scope to affect change via land use controls, was clearly acknowledged in the Auckland Climate Plan (**ACP**), which the FDS seeks to give effect to. For example, the ACP notes the following emissions reduction potential by policy initiative (on page 51):

- Remote working and reduced trip lengths –10% emissions reduction.
- Shifts to PT, walking and cycling – 14% emissions reduction.
- Switching to low-emissions vehicles – 55% emissions reduction.

Given that the FDS will have only minor impacts on the first two categories, its overall potential to accelerate ongoing CO_2 emissions reductions is limited and must be recognised as such.

4.4.4 FUZ GHG Analysis is Flawed & Misleading

According to the FDS, large areas of FUZ are pending further investigation due to natural hazards and the potential for higher-than-desired GHG emissions. We agree that development should be managed in flood-prone areas, or those at undue risk of natural hazards. However, we fundamentally disagree with potentially downzoning large swathes of FUZ due to estimated GHG impacts, because the underlying modelling is stacked against the FUZ. We elaborate below.

To estimate the future GHG emissions of different growth nodes, including the FUZ, various transport and land-use models were run iteratively to determine origin-destination matrices showing the travel patterns for 554 zone (i.e. locations) across Auckland. Mapping those fine-grained model zones to AUP zones, the travel impacts of each growth scenario could be readily estimated.

While the overall modelling approach is fine, the analysis captured only the current snapshot (as at 2022), when many FUZ locations were not well-developed and had relatively poor balances between homes and jobs. In short, by failing to reflect the self-sustaining future state of each FUZ area due to a balanced provision of residential *and* business land (as per their structure plans), the modelling grossly overstates the likely travel impacts of FUZ areas. This major limitation of the VKT and GHG assessment is documented on page 82 of the Future Urban Areas Evidence Report, as per the screenshot below.[19]

[19] Future Urban Areas Evidence Report, page 82.

Figure 3: Caveat of the Future Urban Areas Evidence Report Transport and GHG Assessment

- Presented data is a snapshot in time – some locations may be quite early in their development cycles and (modelled) travel behaviour may change as a result of further development (eg a FUA develops with stage 1 mostly residential, stage 2 mostly employment, but at the time of assessment, only Stage 1 residential development is underway, with PT services expected later, leading to long Car commutes (high VKT and low population) for early residents)

To understand the implication of this, consider the plight of Milldale and the FUZ surrounding it. Not only is Milldale one of New Zealand's largest residential subdivisions, but it is also adjacent to Silverdale West, where about 600 hectares of light industrial land will eventually be live-zoned. However, because the travel analysis reflected only the situation in 2022 when the Silverdale West business node was yet to commence, the travel impacts of Milldale and surrounding FUZ areas were systematically overstated. Conversely, if the model had been rolled forward to include the future employment area nearby, plus the various commercial areas yet to be fully developed within Milldale, its modelled impacts would differ vastly. The same applies in other FUZ areas where residential growth has preceded job growth, or vice versa.

Interestingly, despite this inherent bias against the FUZ, the modelling still showed that people living in the FUZ would generate near-identical rates of CO_2 to those in the existing urban area. In fact, the modelled car CO_2 per household for the FUZ was *lower* than for the existing urban area. See Table 3 below.[20]

Table 3: Outputs of Travel Model for CKT and CO2 by Household Origin

Origin	VKT/Car/Household	Car CO_2/household
Existing urban	48.60	3.31
FUZ	50.59	3.30
Rural	69.74	4.51
Out of Region	51.94	3.40
Total Auckland	**50.39**	**3.40**

4.4.5 Failure to Consider Other Options to Reduce CO_2 Emissions

Reducing CO_2 emissions is a task shared by all levels of Government, each with its own set of levers. For example, Central Government can introduce emissions standards for vehicles entering the fleet, or it can raise petrol taxes, to name but a few. Local Government, on the hand, has a smaller set of tools to play with, so the focus appears to have settled on the use of land use controls to reduce average travel distances.

We agree that shorter trips and greater use of public transport and active modes are important policy targets for Local Government. However, they are not the only tools available, with others being important additions. For example, the ACP identifies the following other ways to help improve Auckland's future GHG emissions profile (some of which may require central Government support):

[20] Future Urban Areas Evidence Report, page 91.

- Reduce private vehicle travel and encourage lower emissions travel options by introducing pricing and parking measures[21]; and

- Implement policies and regulations that facilitate faster uptake of lower emissions vehicles.[22]

And, according to recent policy research, travel demand management (**TDM**) measures like road pricing and parking charges are more effective at reducing VKT than land use controls or mode shifts to public transport (**PT**).[23]

4.5 Intensification Amenity Effects

Unlike its strong focus on transport, the FDS appears to pay little – if any – attention to the potential adverse effects of intensification even though they will vary by scenario. These effects have been widely canvassed in recent policy work, both here and overseas, including a cost benefit analysis completed by Sense Partners and PWC for the MDRS.[24] It identified the following common adverse amenity effects of intensification, none of which appear to be adequately considered in the FDS, particularly for scenario A that relies on widespread intensification.

- Loss of views;
- Shading and loss of sunlight;
- Noise pollution; and
- Light pollution.

Note: while the NPS-UD & MDRS accept that such effects will occur and implore Councils to enable intensification anyway, they are still relevant to the comparison of options (from an economic perspective) but are notably absent from the assessment.

4.6 Impacts on Housing Sufficiency, Choice & Affordability

Finally, we note that the FDS provides very limited coverage on key NPS-UD objectives, such as land market competition, capacity sufficiency, housing choice, and affordability. Given the significance of these concerns, they are addressed separately in sections 6 and 7 below.

[21] ACP pages 82 and 142

[22] ACP page 144

[23] See, for example, the findings of this report: https://www.transport.govt.nz/assets/Uploads/Discussion/DiscussiondocumentHikinateKohuparaKiamaurioraaiteiwiTransportEmissionsPathwaystoNetZeroby2050.pdf

[24] https://environment.govt.nz/assets/publications/Cost-benefit-analysis-of-proposed-MDRS-Jan-22.pdf

5. Option Scoring & Weighting

5.1 Introduction

Once growth options/scenarios and evaluation criteria are identified, the next step in an MCA is to score options against criteria, before weighting the scores to derive an overall ranking of options. In this section we discuss several issues related to the scoring and weighing of criteria.

5.2 Reliability of Model Inputs & Outputs

According to the GSER, the scores derived for each criterion reflect the outputs of an iterative modelling exercise combined with expert judgement. While we agree that a wide range of complementary quantitative and qualitative data should be used to score options wherever possible, we have some concerns about the reliability of the model's inputs and outputs.

First, some of the model's inputs are out-of-date. For example, the modelling assumes the need to accommodate an extra 408,000 dwellings and 380,000 jobs over the next 30 years, compared to only about half that amount in the FDS itself. By modelling much higher levels of growth than are now anticipated, the analysis overstates the travel (and GHG emissions) impacts of each option.

Other inputs of concern include the unreferenced and unsubstantiated assumptions that:

- A city centre cordon and road pricing are in effect from 2031 and 2041, respectively[25]
- Infrastructure required for all options is technically feasible[26]

While the latter is likely for the FUZ where infrastructure requirements have been closely studied, the same cannot be said for the infrastructure required to support widespread intensification under PC78 (whose newfound capacity is integral to the FDS's proposed new direction).

Second, the reliability of the model's processes, and hence outputs, is also a concern. For example, page 12 of the GSER admits that the model crashes and breaks if there is insufficient capacity, which raises concerns about its robustness and reliability. Further, page 18 of the GSER admits that the model has limitations around capturing behaviour change even though that is critical to realising the alleged benefits of certain scenarios. Even worse, page 24 states that:

> *"To direct 'take up' to specific locations sometimes required plan-enabled capacity to be reduced or capped to limit take up and force the model to develop in accordance with the scenario narrative."*

This is a startling confession. Interfering with the model's operation and forcing it to take actions that suit a scenario narrative directly invalidates its outputs and casts serious doubt over the objectivity of the overall modelling process itself.

[25] GSER, page 17

[26] GSER, page 18

5.3 Reliance on Expert Judgement

We are also concerned that expert judgement has played such a major role in scoring the scenarios. For example, the following matters were primarily evaluated by the subject matter experts:[27]

- Natural hazards
- Carbon emissions
- Housing choice
- Biodiversity
- Health of water bodies
- Water quality
- Highly productive soils
- Natural and built heritage
- Access to social infrastructure
- Air quality
- Māori and cultural landscapes
- Costs of development
- Infrastructure
- Market feasibility

These considerations are broad and far reaching, so it is essential that an appropriate mix of experts is used to assess them. However, the number of experts engaged, their qualifications, experience, and areas of expertise are not divulged, which raises concerns that a sufficiently deep and broad mix of expertise has been brought to bear. This is compounded by a comment on page 25 of the GSER which identifies the expert group as comprising only members of the (unnamed) project team plus subject matter experts from Council departments and CCOs.

In our view, the absence of any expert input from other key stakeholders, such as FUZ landowners, dramatically reduces the credibility and reliability of scores derived via expert judgement.

5.4 Many Criteria are Assessed by Narrow/Misleading Measures

There are also several specific scoring issues that appear to hamper the assessment's reliability and directly reinforce scenarios that fit a particular narrative.

The first specific scoring issue is that many criteria in the MCA are assessed against measures that appear unduly narrow, incomplete, or misleading. These include:

- **Access to open space** is measured by the number of households and people within a walkable catchment of an open space that is at least 3000m^2.[28] Not only is this size threshold arbitrary, but the criterion itself does not consider the quality of the experience, nor the likelihood of congestion occurring at existing parks in scenarios with high intensification.

[27] GSER, page 25

[28] GSER, page 36

- The **extent to which population is exposed to harmful air emissions** from transport focusses on the *generation* of emissions, not the population's *exposure* to them.[29] This is highly misleading given the criterion's title, and it obscures the likely health impacts of scenarios that rely on high levels of intensification (such as Scenario A). Instead, this criterion assigns scenario A the highest score possible.

- **Access to social infrastructure** was defined to include access to hospitals via active modes or PT.[30] We consider this unhelpful because hospitals are visited only seldomly. And, when they are accessed, it is usually in a hurry via a car or ambulance. Accordingly, the accessibility of hospitals via PT and active modes is a crude and very narrow way to measure each option's access to social infrastructure.

- Similarly, **access to social infrastructure and employment in high deprivation areas** is partly based on accessibility to tertiary education via active modes or PT.[31] Again, however, very few regional residents are enrolled in tertiary education, so this is an unduly narrow way to measure the overarching criterion. Not only that, but many people are now regularly accessing tertiary education online.

- The **extent of Māori land within growth areas** was crudely inferred via GIS estimates of proximity to Marae and other similar landmarks, without any input from Mana Whenua, despite the assessment recognising that:[32]

  > *"Only Mana Whenua can determine what impact the scenarios would have on Māori land and what types of Māori land are of greatest priority…[but the assessment] does not represent the views of Mana Whenua."*

- **Accessibility to key economic activity** was measured in reference to only the city centre, airport, metropolitan centres, and town centres. While those undoubtedly are areas of key economic activity, they are not the only ones. Others that could/should have been included are the large swathes of business/mixed-use/light industrial zones that span the region:[33]

- **Access to education** was measured by access to tertiary education by PT and active modes.[34] However, as already noted, only a small share of the region's population is engaged in such study and many are now studying online. Moreover, students enrolled in tertiary education are likely to self-select living locations that are relatively close to their place of study, so this specific measure is of limited value for differentiating options.

[29] GSER, page 37.
[30] GSER, page 40.
[31] GSER, page 41.
[32] GSER, page 43.
[33] GSER, page 45.
[34] GSER, page 47.

- **Household living costs** are measured by the extent to which living costs can be reduced by increased proximity to employment opportunities. However, according to the Household Economic Survey (**HES**), transport costs are only about 10% of weekly household spending. Coupled with the fact that travel to work accounts for only 20% of weekly travel, this criterion effectively focuses on an issue that represents only about 2% of weekly spending.

- **Costs of development** were measured only by the extent to which physical constraints (like contour or instability) may affect them.[35] This is an incredibly narrow view of development costs and, amongst other things, overlooks the effects of lower land market competition on section prices. At the same time, it penalises development in newer areas where land is yet to be shaped and readied for buildings, while glorifying intensification, despite noting that:

  > *"At the evaluation workshop, the relativity between scenarios was agreed because Scenario D takes development into more marginal land. However, it is also acknowledged that within existing urban areas there may be additional development costs that are not addressed by the evaluation."*

- **The extent to which the market is likely to respond to the development pattern** conflates areas with high land value as areas that are attractive to the market, even though the opposite is often the case.[36] i.e. the market often prefers lower cost options.

5.5 Cardinal Nature of Model Outputs Not Reflected in Scores

The next specific scoring issue is that the cardinal nature of the modelling outputs is not reflected in the MCA scores. For example, an option may have scored only slightly better than another on a particular criterion according to the modelling, but the MCA scores imply that it performed two or three times better overall. This issue affects at least four of the MCA's 29 criteria, including:

- The extent to which scenarios impact carbon emissions (page 32);

- Mixed use communities (page 40);

- Accessibility to key economic activity (page 45); and

- Infrastructure costs (page 55).

5.6 Scoring Does Not Reflect Preceding Discussion

Finally, we note that the scoring for several criteria do not reflect the preceding discussion in the GSER. This issue affects at least six of the MCA's 29 criteria, including:

- The degree to which urban development consumes highly productive (page p35);

- Housing choice (page 39);

[35] GSER, page 56.

[36] GSER, page 57.

- Access to social infrastructure by high deprivation areas (page 42);
- Access to education (page 47);
- Household living costs (page 50); and
- Costs of development (page 56).

5.7 Decision Not to Weight Criteria

As noted earlier, the expert evaluators made the unexplained decision not to weight the criteria when assessing options. This is highly unusual, and it directly elevates the importance of some factors while systematically downplaying others. That's because, absent weights, the more criteria per theme, the greater the weight afforded that theme in the evaluation, and vice versa.

For example, suppose that one theme is measured by 10 criteria, while another theme is measured by only two criteria. If weights are not applied, the first theme carries five times as much weight in the overall MCA than the other. Usually, this is addressed by applying weights that mitigate differences in criteria breadth and depth, but that is not the case here.

The following table puts the issue in context by showing the share of the MCA's 29 criteria that fall into (our suggested) evaluation themes, and the implied weighting on each overall. Clearly, the absence of weights causes some themes to be given excess weight at the expense of others, which lacks explanation and almost invariably distorts the assessment of options.

Table 4: Number of Criteria and Implied Weighting by Evaluation Theme

Evaluation Themes	**Number of Criteria**	**Implied Weight**
Travel Impacts/Accessibility	11	38%
Environment	4	14%
Land & Housing Markets	4	14%
Social/Culture/Heritage	2	7%
Economy	2	7%
Infrastructure	2	7%
Māori	2	7%
Natural hazards/Climate adaptation	2	7%
Total	**29**	**100%**

6. Consideration of Capacity Sufficiency

6.1 Introduction

The NPS-UD requires Auckland, like all high growth areas, to provide at least sufficient housing and business capacity to meet demand (at all times) right through to the long term, including providing a range of options to meet varying needs, preferences, and budgets. The NPS-UD also specifies different types of capacity that must be assessed, which vary according to whether they are:

- Plan-enabled;
- Serviced (or serviceable) with infrastructure;
- Feasible for development; and
- Likely to be realised over each NPS-UD timeframe.

These different measures of capacity are critical to understanding whether planning decisions, such as future development strategies, enable enough capacity to meet likely future demand. Unfortunately, however, the FDS remains relatively silent on these matters and appears to pay little attention to capacity sufficiency. We elaborate briefly below.

6.2 Reliance on PC78 Plan-Enabled Capacity

Section 3.3 of the FDS addresses development capacity, albeit only at a high level. It refers to plan-enabled capacity for an additional 2.35 million additional dwellings, much of which stems from recent theoretical capacity uplifts ushered in by PC78. For ease of reference, the table below shows the broad location of this plan-enabled capacity relative to the distribution of existing dwellings.

Table 5: Location of Plan-Enabled Capacity Relative to Existing Spatial Form

Existing urban	% of Existing Dwellings	% of Plan-Enabled Capacity
Central City	5.0%	3.5%
Inner Suburbs	3.4%	1.5%
Eastern Brownfield	10.9%	10.9%
Isthmus Brownfield	26.9%	26.0%
Northern Brownfield	16.4%	16.2%
Southern Brownfield	13.2%	16.2%
Western Brownfield	6.7%	6.6%
Greenfield		
Northern-western Greenfield	10.9%	9.1%
Southern Greenfield	1.5%	3.0%
Rural		
Northern Towns	1.6%	2.4%
Rural	1.0%	0.7%
Southern Towns	2.6%	3.8%
Auckland Totals	**100.0%**	**100.0%**

An important observation from this table is that PC78 has boosted capacity in relatively remote existing urban locations, such as southern Brownfield where job accessibility is poor, but produced very little capacity in areas that are favoured by the growth options assessment. For example, the city centre accounts for 5% of existing dwellings, but only 3.5% of plan-enabled capacity. Similarly, the inner suburbs account for 3.4% of existing dwellings, but only 1.5% of plan-enabled capacity. On

the other side of the ledger, northern and southern rural towns account for a notably higher share of plan-enabled capacity than their corresponding shares of existing dwellings.

Thus, while PC78 may enable unprecedented levels of plan-enabled capacity, it does not necessarily help meet the region's goal of a compact urban form. In fact, because the capacity uplifts caused by PC78 are inversely proportional to the density already enabled by the AUP, it significantly boosts capacity in peripheral locations, but has relatively little impact in and around centres where higher density is already permitted.

This is reflected in the excerpt below, which shows the location of plan-enabled capacity relative to the city centre.[37] Given these insights, it is important not to get waylaid by the very large (aggregate) plan-enabled associated with PC78 and instead drill-down to consider whether that supposed theoretical capacity helps achieve the desired compact urban form. Potentially not.

Figure 4: Location of PC78 Plan-Enabled Capacity Relative to City Centre

5.2.4 Enabled Capacity by Distance from the CBD

The plan-enabled capacity in each travel distance band from the city centre is shown in Table 5-1, and compared with existing dwelling numbers. The plan-enabled capacity increases with distance outward from the city centre. Under the current AUP, there is plan -enabled capacity for close to 231,000 dwellings within 6km of the centre. The NPSUD/MDRS provisions without QMs would enable some 371,000 dwellings. With all QMs in place, the plan-enabled capacity would be some 276,000 dwellings. This is about 3.8 times the current 79,000 dwellings there.

Table 5-1 : Plan-Enabled by Distance from CBD

Distance from CBD (km)	Existing Dwellings	MDRS/ NPSUD No QMs	MDRS/ NPSUD (with all QMs)
0-2	28,800	96,500	90,000
2-3	13,500	67,900	40,000
3-4	10,500	57,700	36,100
4-5	10,900	61,400	44,600
5-6	15,200	87,500	65,000
0-6	79,000	371,000	276,000
6-10	87,000	478,900	414,600
10-12	45,100	304,900	281,200
12-15	66,700	411,100	370,300
0-15	278,000	1,566,000	1,342,000

Source: Housing Enablement Model 2022

Another issue is that PC78 is now effectively on hold, so it seems inappropriate to continue relying on its potential theoretical capacity. If PC78 is later withdrawn or revised substantially, there may be major implications for capacity sufficiency, but this is not properly acknowledged in the FDS. Moreover, plan-enabled capacity is a purely theoretical metric that has no real-world meaning, so relying on it here is, in our view, imprudent.

[37] PC78 Economy Matters section 32 report, page 99.

6.3 Assessing Serviceability, Feasibility & Realisability

Another concern is that FDS does not explicitly consider the infrastructure serviceability of growth associated with each scenario. Instead, it simply assumes that any infrastructure required to service growth will be technically feasible.[38] That will not always be the case, though.

Take, for example, the upgrading or replacement of a water or wastewater trunk main through a densely developed part of the existing urban area. The disruption associated with such an upgrade may render it technically (and/or practicably) infeasible, and this is more likely for growth scenarios that rely heavily on intensification. Again, however, this is not addressed in the FDS.

Similarly, the FDS and its accompanying evidence reports does not appear to properly consider financial feasibility. Instead, it invokes the following logic, presumably as a reason not to bother.[39]

Figure 5: Future Urban Areas Evidence Report Comments on Residential Capacity

1.3.5 Residential development capacity

The statutory requirement to apply MDRS to Auckland's residential zones has changed the development landscape by substantially increasing residential development capacity.

The draft FDS meets the statutory requirement under the NPS-UD to ensure there is at least sufficient housing and business development capacity to meet demand over the next 30 years. (Auckland Council, 2023d). Therefore, the draft FDS does not focus on identifying significant additional plan enabled development capacity. The focus is rather on the quality aspects of accommodating growth; where and how development take-up occurs.

This sentiment is echoed in the FDS itself, which states that plan-enabled capacity is several times the level of expected demand[40], which evidently provides some latitude. Then, it claims that "much of this enabled capacity is or will be commercially feasible" but that not all needs servicing now.

We consider it inappropriate to merely assert that a high proportion of plan-enabled capacity will be feasible without doing the work to prove it. Indeed, development feasibility has changed dramatically over the last few years due to the compounding effects of lower house prices, higher construction costs, and significantly higher interest rates. Together, these changes conspire against feasibility and may result in a shortfall, particularly over the longer term.

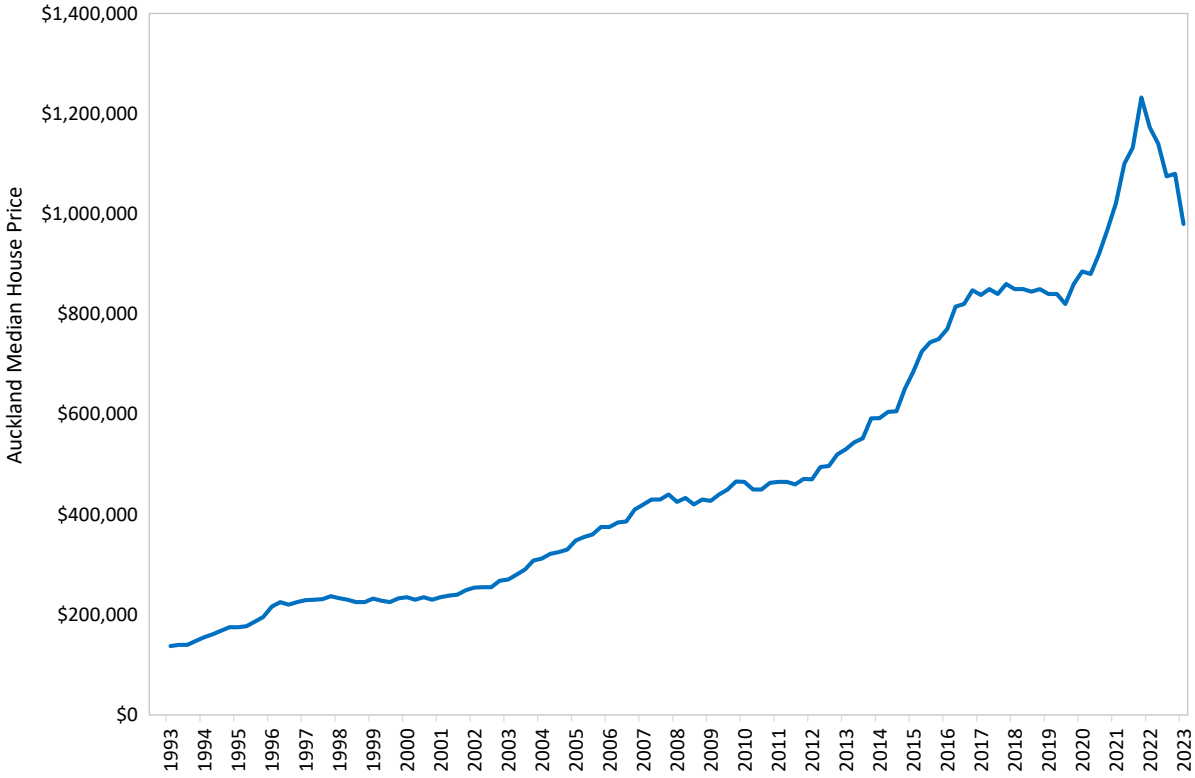
For context, the chart below shows how Auckland's median house price has tracked over time. While it has climbed steadily since the early 1990s, the region's median dwelling price has fallen precipitously from about mid-2021 onwards (when the FDS' modelling appears to have been done). In fact, the median price has fallen from $1.23 million in mid-2021 to only $980,000 in early 2023, a drop of more than $250,000 (or 20%) in less than two years. Coupled with the near-30% increase in residential construction costs over the same period, it should be clear that development feasibility has changed fundamentally and hence that relying on previous feasibility analyses is inappropriate.

[38] GSER, page 18.

[39] Future Urban Areas Evidence Report, page 14.

[40] FDS, page 29

Figure 6: Auckland Median Dwelling Price (from NPS-UD dashboard)



Not only does the financial feasibility of development appear to mostly be overlooked by the FDS and the GSER but, when it is considered, it is via an unorthodox approach that is unlike anything we've ever seen before. Specifically, the GSER summarises its approach to estimating development attractiveness and feasibility as follows:[41]

> *"The attractiveness of a [MSM transport] zone is determined through the land use model based on various aspects. Firstly, it looks at the permissible development (capacity together with the projected household and employment growth) to determine how much additional development is required to accommodate growth.* ***It then looks at the "rent values" in each to determine which zones are profitable to develop*** *(from developer's point of view higher rent means more profit). Baseline rent values are from the Council's rating database."* [emphasis added]

In terms of likely realisable capacity, the FDS appears to rely on historic uptake to determine that sufficient realisable capacity exists. Specifically, it states:[42]

> *"Take-up has been high in almost all areas where intensification has been enabled by the AUP, including in relatively low land-value locations. Ongoing take-up of these opportunities is reasonably expected wherever they are provided."*

We agree that take-up will continue, but not necessarily like it has before. First, financial feasibility has changed substantially. Second, many of the best intensification opportunities have already been

[41] GSER, page 24
[42] FDS, page 30

taken up, with remaining ones likely to be more marginal. Third, the capacity unlocked by PC78 is not like the capacity unlocked by the AUP, so this statement is a false equivalence.

6.4 Consideration of Business Land Needs

Finally, we note that the FDS appears to pay scant attention to ensuring that sufficient business land is provided in the right places at the right time to keep pace with demand. Instead, the FDS simply asserts that:[43]

> *"There is likely to be at least sufficient plan-enabled business capacity on an aggregate, region-wide basis."*

However, this is immediately qualified in the next paragraph as follows:[44]

> *"Shortfalls in some sub-regions, or for specific business sectors, particularly for land extensive sectors could occur in the short to medium term. Over the medium to long-term, these are planned to be addressed by the provision of additional business-zoned land, including through the provisions of new centres in new development areas."*

We agree that there will be shortfalls in business capacity over the short- to medium-term for certain parts of Auckland and/or specific business sectors. This is reflected in the current, historically low vacancy rates prevailing in many of the region's business property markets.

For example, a Colliers research report for the first quarter of 2023 noted that the region's industrial property market had reached a historically low level of vacancy, with the vacancy rate for prime industrial properties falling to only 0.5%.[45] In some southern industrial areas, such as Manukau/Wiri and East Tamaki, there were virtually no vacancies as at the time of their survey. This is a concern, because a lack of vacant premises stifles opportunity and may even cause some businesses to be displaced to other regions, such as the large new business area in Pokeno.

Other recent research reports draw similar conclusions. For example, Bayleys[46] recently noted that "historic low levels of vacancies, combined with strong demand from occupiers, is often resulting in spaces being leased well in advance of actual lease expiry dates or physical vacancies." This is highly unusual and reveals the extent of current industrial land shortages.

The Bayleys report goes on to state that "persistent shortages of industrial land have led to substantial growth in prices. Would-be owner occupiers are increasingly having to extend their search perimeters [sic] out to the fringe of the region or even into other regions." Other research by CBRE[47] and JLL[48] also report incredibly low vacancy rates for many business property markets, which confirms an acute need to provide additional business land now.

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[43] FDS, page 31

[44] ibid

[45] Colliers, Auckland Industrial Snapshot for Q1 2023, page 1.

[46] Bayleys, Industrial Market Update, Auckland Q1 2023

[47] CBRE, Auckland Property Market Overview, Q1 2023

[48] JLL, Market Snapshots Q1 2023.

Despite this backdrop of a dearth of available business land, the FDS appears to take a rather cavalier attitude to planning for growth in business activity. It cites fanciful estimates of vacant and vacant potential capacity within existing business areas[49] and appears to presume that this can meet short to medium term needs.

Not only do we categorically reject the FDS' estimates of additional business capacity residing within existing areas, but we also consider its assessment of the need for additional business land to be internally inconsistent. On one hand, it notes that at least 1,000 hectares of business land will be needed in new urban areas, but on the other it appears to delay the rezoning/enablement of them. For example, it seems that the rezoning of the Silverdale West business area has been pushed back despite being a critical part of the blueprint for that area.

In our view, the FDS's approach to business land is reckless. Not only will it starve the market of much needed boosts in supply to rectify existing shortfalls and keep pace with projected growth in demand, but it will also push up land prices and thereby undermine affordability for businesses looking to establish, expand, or relocate within the region.

[49] For example, it estimates unrealistic levels of plan enabled capacity above ground floor in areas where ground floor locations are not only preferred, but often essential for access and other reasons.

7. Impacts on Choice & Competition

7.1 Introduction

Just as the FDS provides only very limited commentary on capacity sufficiency, so too does it pay surprisingly little attention to other NPS-UD objectives, such as land market supply, competition, plus future housing choice and affordability. We briefly touch on these issues below.

7.2 Importance of Fostering & Maintaining Competition

A key plank of the NPS-UD is to foster and maintain competition in both land and development markets. For example, Objective 2 of the NPS-UD seeks that:

> *"Planning decisions improve housing affordability by supporting competitive land and development markets."*

This is given effect to via Policy 1 of the NPS-UD. It requires planning decisions to contribute to well-functioning urban environments, which (amongst other things):

> *"Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets."*

At a more prescriptive level, the NPS-UD requires Tier 1 territorial authorities like AC to complete a housing and business capacity assessment (**HBA**) triennially to inform its Long-Term Plan (**LTP**), with clause 3.23 specifically requiring that:

> *"Every HBA include analysis of how the relevant local authority's planning decisions and provision of infrastructure affects the affordability and competitiveness of the local housing market."*

Notwithstanding this unambiguous policy direction, though, the FDS provides no analysis of likely effects on competition. This seems to reflect AC's apparent perspective that:

- The introduction of the concept of "well-functioning urban environment" (**WFUE**) has shifted the focus of the NPS from an economically driven policy (like its predecessor, the NPS-UDC) to one that incorporates a range of non-economic factors; and

- Although WFUE has mandatory elements, Councils can add to them. AC has added numerous non-mandatory elements to its definition of WFUE and formulated a set of assessment criteria that seem to weigh these more heavily than some of the mandatory criteria; and

- The words "limit as much as possible adverse impacts on" in Policy 1(a)(d) imply that it is anticipated that planning for other aspects of well-functioning urban environments will generate some adverse impacts on competitive land markets, which are therefore acceptable in NPS-UD terms, which helps justify its decision to curtail FUZ opportunities.

While AC is correct that it can include non-mandatory factors in its definition of WFUE, this should not be at the expense of other core purposes of the NPS-UD. To be frank, it appears that the FDS has placed undue weight on these new elements of WFUE while losing sight of economic factors (such as supporting housing affordability and enduring competitive land markets). These remain key focuses of the NPS-UD, but the FDS does not adequately capture that.

In particular, the potential downzoning of large swathes of the FUZ is a significant concern in terms of fostering and maintaining competition. Without a strong and ongoing supply of new urban land in strategically chosen locations (as per the current development strategy), the competitive operation of the region's urban land market will be compromised. Economic theory explains the potential risks of this loss competition as follows:

- **Preventing Market Power and Monopoly**: Competition prevents the concentration of market power and the emergence of monopolistic practices in land markets. If a single entity or a small group of firms dominates the market, they can exert control over prices, limit choices, and stifle competition. Competition avoids this prospect by enabling multiple buyers and sellers to interact within local land markets.

- **Consumer Choice and Affordability**: Competition enhances consumer choice and promotes affordability in land markets. When there are many developers and landowners competing for buyers or tenants, consumers have a wider range of options to choose from. This competition exerts downward pressure on prices, making land and housing more affordable for a broader segment of the population. Moreover, competition encourages developers to differentiate their offerings by providing better amenities, quality construction, and innovative designs.

- **Price Discovery**: Competition enables price discovery. When multiple buyers and sellers actively engage in a market, they compete to buy or sell on the best possible terms, thereby enabling "discovery" of the current market price (where supply and demand meet). This ensures that market prices better reflect the true value of land based on its size, location, potential uses, and other valued attributes (rather than the profit-seeking behaviour typical of monopolies).

- **Efficiency and Productivity**: Competition fosters efficiency and productivity in land markets. In competitive environments, developers and landowners strive to maximise returns by using land resources optimally. This fosters innovative land uses, such as mixed-use development, and adaptive reuse of existing structures. Competition drives developers to find creative solutions to meet the changing needs of residents, leading to improved productivity and efficient land utilisation.

- **Investment and Development**: Competition also attracts investment and spurs development in nearby areas. When developers and investors perceive a viable market, they are more likely to invest in land and undertake development projects. The prospect of earning profits

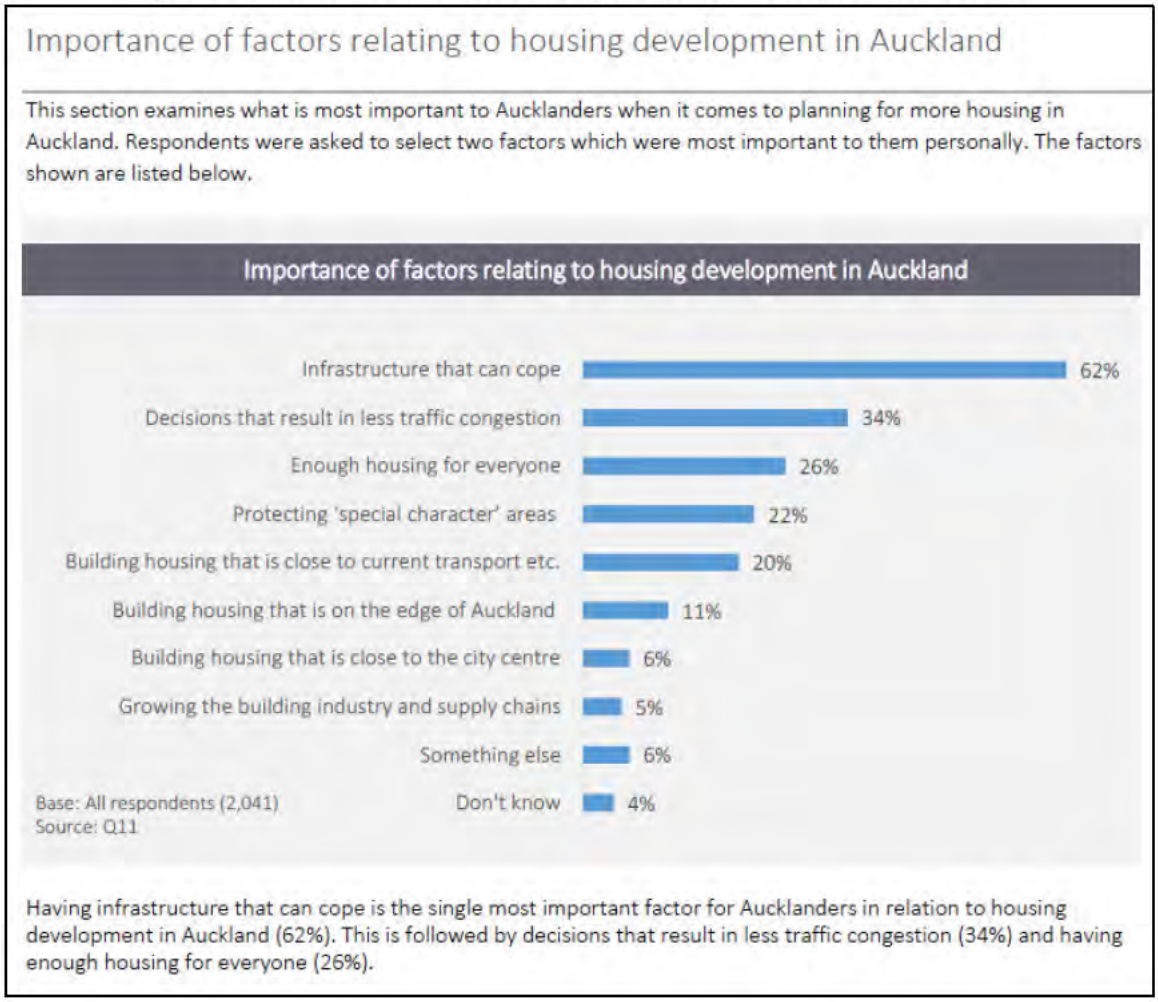
motivates developers to take risks and initiate new projects. Increased investment and development activities contribute to economic growth and job creation.

Overall, we are concerned about the FDS's potential impacts on competition. The large volumes of theoretical capacity unlocked via PC78 are not complete substitutes for competition in regional land markets. And, absent the latter, land prices will rise, flowing directly into new dwelling prices.

7.3 Providing Housing Choice & Reflecting Community Values

Finally, we note that it is critically important that the FDS promotes housing choice and reflects what's important to residents and businesses. In our view, the FDS is far too concerned with its futile pursuit of curbing GHG emissions, which does not reflect the community's preferences. See, for example, the chart below which shows the importance of various factors to the Auckland community in relation to planning for more housing.[50]

Figure 7: Importance of Various Factors Relating to Planning for More Housing in Auckland



As we can see above, "infrastructure that can cope" mattered the most to Aucklanders when surveyed (in 2021/2022) about the things that matter most in terms of planning for more housing.

[50] IPI Overall Evaluation Section 32 report, page 284

We expect that infrastructure adequacy will be an even greater concern now following the devastating effects of the anniversary weekend floods coupled with Cyclone Gabrielle. Together, these events revealed massive vulnerabilities in the three waters network and highlighted the risk of excessive intensification (i.e. creating too much impervious surface area in concentrated locations).

In our view, the FDS does not properly reflect the factors that matter most to Aucklanders in terms of new housing opportunities. This is exacerbated by a seeming over-reliance on capacity unlocked by PC78, most of which reflects intensification, and almost all of which[51] is only for one housing typology (attached). This limited range of choice is unlikely to best meet the needs of Aucklanders over time, so it is critical that the FUZ is maintained as much as possible to provide housing choice and boost competition in the region's urban land market(s).

[51] According to PC78 documentation, 96% of plan-enabled residential capacity is for terraces or apartments.

8. Deriving the FDS from the MCA

8.1 Introduction

Finally, the methodology used to translate the options analysis into the FDS' preferred scenario (i.e. its composite scenario) is unclear. Rather than selecting the best-performing option from the MCA, the FDS creates a new, hybrid option from the results that lacks any meaningful detail. This, in turn, obscures the details of the implied new strategic direction, and its rationale. This is a concern, and not just for transparency reasons, as briefly explained below.

8.2 Impacts of Negative Scores

The MCA adopted a seven-point scoring scale, ranging from -3 to 3, with negative scores reflecting bad outcomes, and positive scores good outcomes. While that's fine, the GSER makes the following critical acknowledgement about the implications of negative scores in its assessment, which is not captured in the overall narrative of the report:[52]

> *"In most cases, a negative score indicates the need for a specific policy intervention in addition to, or even instead of, land use or transport interventions alone."*

The table below shows the MCA scores, with red text indicating negative ones. Clearly, there are a lot of negative scores.

Table 6: MCA Scores (Red Values = Negative)

Criteria Themes	MCA Criteria (paraphrased)	A	B	C	D
Natural hazards & climate change	The extent of development areas in 100-year floodplains (greenfields)	-1	-1	-2	-3
	The extent of development areas in 100-year floodplains (brownfields)	-1	-3	-2	-2
Travel & Access	The extent to which scenarios impact carbon emissions	-1	-2	-2	-3
Environment	Scope to improve the health of natural wetlands (greenfields)	1	1	2	2
	Scope to improve the health of natural wetlands (brownfields)	-1	-1	-2	-2
	Impacts on ability to swim safely and collect shellfish	-1	-1	-2	-3
	Promotion of the restoration/connectivity of indigenous biodiversity	-1	-1	-1	-2
Economy	The degree to which urban development consumes highly productive soils	-1	-1	-2	-3
Social, Cultural, and Heritage	Retention of the qualities of historic heritage places and values	-2	-1	-1	0
	Likely result on levels of access to quality open space	2	1	1	-1
Travel & Access	Extent to which population is exposed to harmful air emissions	3	2	1	1
Land & Housing	Extent to which growth creates greater housing choice to meet demand	1	1	1	0
Travel & Access	Promoting mixed use communities to reduce travel distances & safety risks	2	1	1	-1
	Providing inclusive/equitable access to social infrastructure & public spaces	1	1	-1	-2
	Accessibility of social infrastructure & employment in highly deprived areas	-2	-3	-3	-3
Māori	Extent of Māori land within growth areas	1	1	1	2
	Extent to which scenarios impact on Māori cultural landscapes	-2	-1	-1	-3
Travel & Access	Accessibility of key areas of economic activity by PT + active modes	3	3	2	1
	Education is accessible by different modes (PT + Active)	3	2	1	2

[52] GSER, page 7.

Criteria Themes	MCA Criteria (paraphrased)	A	B	C	D
	Employment opportunities are aligned with areas of population growth	3	2	2	1
	Household living cost reductions from proximity to employment areas	3	2	1	1
	Rural production areas are accessible	-1	-2	-2	-2
	Travel times are reliable	-1	-2	-2	-2
Economy	Opportunities for agglomeration of similar/dependent industries	3	1	1	-1
Land & Housing	Suitable land is available for Group 1 (land extensive) industries	-2	-3	-2	-2
Infrastructure	Scenarios support current committed infrastructure	1	2	3	-2
	The scenarios result in measurable public monetary costs or losses	2	1	-1	-3
Land & Housing	Physical constraints increase the cost of development	-1	-2	-2	-3
	The market is likely to respond to the proposed land use pattern	1	1	-1	-2

In truth, more than half (56%) of all MCA scores are negative. Even the utopian scenario A scored negatively on 14 of the 29 criteria (48%). Table 7 summarises the situation by (our suggested) criteria theme. The widespread dominance of negative scores highlights the FDS' limited ability to affect meaningful change according to its own reporting.

Table 7: Share of Negative, Positive, and Neutral Scores by Theme

Criteria Themes	Negative Scores	Neutral Scores	Positive Scores
Travel impacts/accessibility	43%	0%	57%
Environment	75%	0%	25%
Land & Housing Markets	63%	6%	31%
Social, Cultural, and Heritage	50%	13%	38%
Economy	63%	0%	38%
Infrastructure	38%	0%	63%
Māori	50%	0%	50%
Natural hazards & climate adaptation	100%	0%	0%
All Themes	**56%**	**2%**	**42%**

8.3 Consideration of Infrastructure Implications

Infrastructure is a major technical and financial challenge for all Councils, especially in growing areas like Auckland. However, the GSER has only two criteria on infrastructure, which belies its vital importance in helping redefine the region's growth strategy. The scores for those two infrastructure criteria are reproduced below.

Table 8: Scenario Scores for Infrastructure Criteria

Criteria Themes	MCA Criteria (some paraphrased)	A	B	C	D
Infrastructure	Extent to which scenarios support current committed infrastructure	1	2	3	-2
	The extent to which scenarios result in measurable public monetary costs or losses over time	2	1	-1	-3

Table 8 shows that Scenario C, which is the closest match to the status quo, rightfully scored best on the first criterion because it most closely aligns with the agreed development trajectory and hence current growth-related infrastructure programme. But, Scenario C performed poorly on the second

criterion (the extent to which it could result in measurable public monetary costs or losses). Overall, the GSER concludes that:[53]

> *"More intensive compact urban forms perform better in terms of the least monetary cost of infrastructure over time, as they result in more efficient use of existing services and new infrastructure. More expansive urban forms require the greatest amount of new infrastructure with the highest costs."*

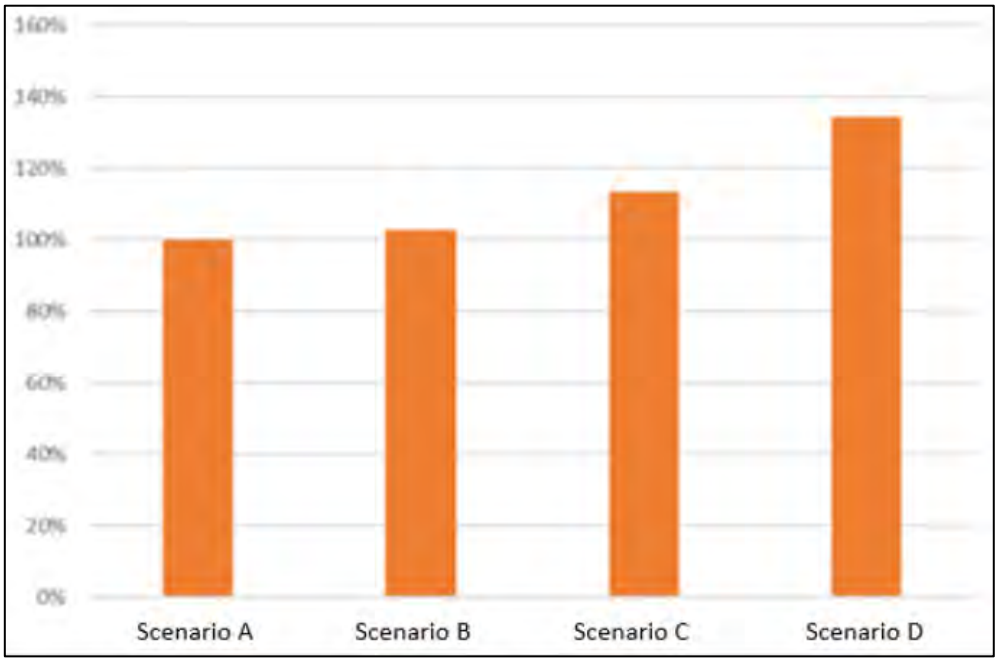
We challenge this conclusion on several grounds. First, the process used to quantify the infrastructure costs of each option are not explained. According to the GSER, infrastructure criteria were evaluated via subject matter expert input, which seems wholly inadequate given the cost and importance of infrastructure implications arising from the FDS.

Second, the cost of providing most growth-related infrastructure is recovered directly from developers via development contributions, private developer agreements, and developer self-provision. Accordingly, the reference to public monetary costs in the second criterion is misleading.

Third, the cost of (eventually) upgrading infrastructure networks in some existing urban areas could also be prohibitively expensive and/or cause unacceptable levels of disruption. This risk is particularly acute for the widespread, uncontrollable, and unpredictable growth enabled by PC78, which Scenarios A & B both rely heavily on, but the MCA scores wrongly signal otherwise.

Fourth, notwithstanding all the above, the "modelled" differences in infrastructure cost across options is much less than the scores, commentary, and conclusions suggest. This is shown in the screenshot below from page 55 of the GSER.

Figure 8: Relative Cost of Infrastructure to Service Expected Growth



[53] GSER, page 9.

To our eyes, it appears that Scenario C's infrastructure costs are only about 15% more than the far-fetched Scenario A. This is relatively immaterial in the scheme of things, with most projects having contingency buffers that far exceed the implied differential in option infrastructure costs.

Given that developers bear virtually all growth-related infrastructure costs, not ratepayers, we consider the FDS's analysis of infrastructure implications to be deficient and highly unreliable. This raises serious concerns about the validity of relying so heavily on intensification to meet the region's future business and residential needs.

8.4 Aligning New Jobs with New Homes

As already noted, the FDS places significant emphasis on travel impacts and accessibility, including the relative locations of new jobs and new homes. It assumes that more intensive development of existing urban areas is best because it lets new homes reside near existing employment areas. In forming this view, the FSDS seems to overlook the reality that many existing employment areas are almost fully built-out, with only limited scope for growth.

This again highlights the risk of relying just on plan-enabled capacity measures. While there may be enormous theoretical potential via the redevelopment of existing employment areas, this is seldom financially viable, particularly compared to residential, so it will not occur *en masse*.

In short, The FDS' presumption of significant job growth in existing urban areas is unlikely in some areas. Accordingly, new business land *will* be required in and around the FUZ to keep pace with residential growth and to address historic and existing home/job balances in the region's greenfield areas. This is also recognised in the executive summary of the GSER, which states that:[54]

> *"Providing business land opportunities in future urban areas provides opportunities to balance employment and housing."*

We agree wholeheartedly, and even the FDS notes the capability of FUZ business land to help improve employment access and bolster travel outcomes, but the proposal to undertake wholesale investigations of large parts of the FUZ (partly on travel grounds) directly contradicts it.

In our view, key decisions about the region's likely future urban form deserve a far more rigorous and reliable evaluation of options before any tweaks to the existing direction can be identified. Afterall, even the MCA itself observed the following about spatially aligning new jobs and homes: [55]

> *"Across all scenarios the model favours greenfield areas with the most job growth in [the FUZ] in Rodney and then Franklin."*

[54] GSER, page 9.

[55] GSER, page 48.

ATTACHMENT C

TRANSPORT FEEDBACK ON THE DRAFT FUTURE DEVELOPMENT STRATEGY

18 JULY 2023

FLOW TRANSPORTATION SPECIALISTS

flow
TRANSPORTATION SPECIALISTS

18 July 2023

Aidan Donnelly
General Manager, Development
Fletcher Living
Private Bag 99922
Newmarket
AUCKLAND 1149

Dear Aidan

TRANSPORT FEEDBACK ON THE AUCKLAND FUTURE DEVELOPMENT STRATEGY

Flow has been asked by Fletcher Living to provide comments on the Draft Auckland Future Development Strategy (Draft AFDS), which was recently released by Auckland Council. The Draft AFDS is proposed to replace the Future Urban Land Supply Strategy 2017 (FULSS) and the Auckland Plan 2050 Development Strategy 2018. If adopted, the AFDS will form the basis of Auckland's long term strategic planning framework.

The AFDS seeks to place some rigor on future development when considering the challenges currently faced by Council, which relates to financial challenges (funding), developing in flood prone areas, and ensuring that Government (both local and central) obtain a return on major infrastructure investments.

1 SUMMARY OF OUR ASSESSMENT

Our assessment discusses the transport concerns with the AFDS, as it relates to the following:

- The AFDS proposes to delay Future Urban Zoned land that is earmarked for employment (in particular light industry), as assessed through Structure Plans. In doing so, the AFDS will make it challenging for established/establishing residential catchments located about the fringe of Auckland to align with the outcomes sought by the Transport Emissions Reduction Pathway (TERP). This is because by delaying the outer employment areas, the AFDS
    - puts greater reliance on others (eg Auckland Transport and public transport providers) to establish and operate viable public transport networks that get people to work at the time and with the reliability that they need
    - reduces the ability to travel by cycle, scooter, and walking to access nearby employment
    - decreases the opportunities for those living in adjacent residential areas to drive shorter distances to work, therefore reducing vehicle-kilometres travelled
    - increases economic and social inequities, by making people more reliant on travelling by car if public transport cannot provide a viable alternative.

- Appendix 8 of the ADFS proposes to delay land development, aligning development when the strategic infrastructure required to service the "full build-out" of development area is "likely to be implemented". This outcome gives no certainty to when land can be developed. While the assessment of plan changes under the existing framework can be improved, development controls and developer funded upgrades that mitigate transport effects can suitably be captured in the current planning framework and reflects that development of large Plan Change areas and associated upgrades can be sequenced and occur over a number of years, if not decades.
- There is no certainty as to the timeframes of the Transport Triggers set out in Appendix 6 of the AFDS, with a number of concerns relating to the triggers suggested. These concerns along with some commentary are set out below.

2 DELAYING LAND EARMARKED FOR EMPLOYMENT

2.1 AFDS Proposal

The AFDS proposes to delay/push back the timing of Future Urban Zoned land that, through Structure Plans is earmarked for employment (light industry) development. The areas which have been delayed are located where residential growth is currently occurring at a fast rate, as allowed through approved resource consents. Large areas where employment land is proposed to be delayed are set out in Table 1.

Table 1: Revised timing of employment land

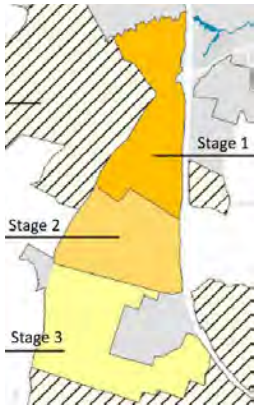
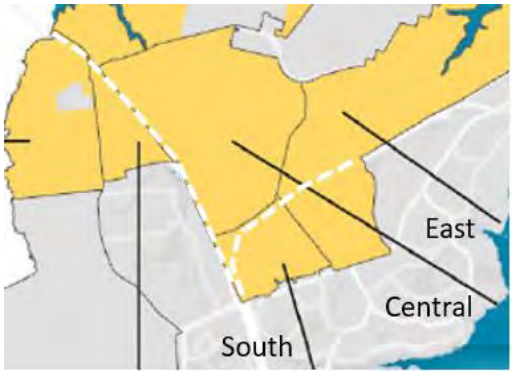
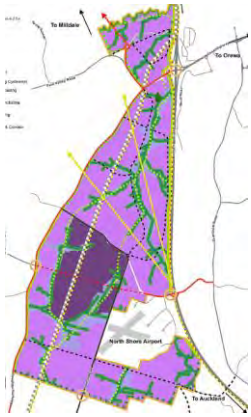
Area	Silverdale/North	Whenuapai/Northwest	Pukekohe/South
Location Map			
Structure Plan	Silverdale West Dairy Flat Industrial Area Structure Plan, April 2020	Whenuapai Structure Plan, September 2006	Pukekohe-Paerata Structure Plan 2019

Table 1: Revised timing of employment land

Area	Silverdale/North	Whenuapai/Northwest	Pukekohe/South
			
FULSS 2017 Timing	2018-2022	2018-2022 (East) 2028-2032 (Central)	2023-2027 (Pukekohe Southeast, Southwest)
AFDS Timing	2030+ (Stage 1) 2035+ (Stage 2) 2040+ (Stage 3)	2035+ 2050+ (Stg 2 North)	2035+ Pukekohe Southwest 2040+ Pukekohe Southeast
Proposed Jobs	9,000 Jobs (FULSS)	8,600 Jobs (WSP)	2,350 Jobs (PPSP)

2.2 Development of employment land

In recent history, the development of employment (light industry) land has taken 20+ years to be occupied, with recent examples including North Harbour Industrial Estate, Highbrook and The Landing at Auckland Airport. Each of these locations has relied on a suitable connection to the state highway network via an interchange, allowing the movement of road freight and vehicle-based employment related trips. Importantly, these areas have provided employment opportunities to the north, central and southern areas of Auckland. However, due to the lack of available light industrial land further afield, they are also employment hubs relied on by the wider population, with some having little or no support from suitable public transport.

The Auckland Transport Alignment Project (ATAP) report that underpins the transport investments included in the RLTP/AFDS highlights the *"significant unevenness to future employment accessibility and a growing polarisation of access to employment in the future. By 2046 more than a million people will be living in the western and southern parts of Auckland, nearly half the region's population. However these areas see relatively little improvement in their access to employment over time."*[1]

[1] https://www.transport.govt.nz/assets/Uploads/Report/ATAP-Evaluation-Report.pdf. Page 15

From a transport perspective, it is important to note that the traffic effects of a development area are not experienced from day one but are instead realised over time (20+ years). Recent development areas such as Drury South (Precinct I410) and Puhinui Precinct (I432) set out transport triggers and matters of discretion that need to be addressed to allow development to progress in an integrated manner, where effects are managed. While these frameworks can be improved, the intent of the provisions is to ensure integrated land use and transport network outcomes.

2.3 Travel behaviour

Residential growth enabled by the Metropolitan Urban Limit (MUL) and more recently, the Rural Urban Boundary (RUB) has increased population about Auckland's fringe. However, the development of employment land, and the provision of public transport networks, have not occurred at a similar pace, which in turn requires people to travel large distances to reach employment hubs.

We have assessed the travel behaviour of commuters about these outer areas (Whenuapai and Silverdale/Whangaparāoa) to better understand the destinations where people currently travel for work.

The 2018 Census commuting data (refer **Error! Reference source not found.**) shows that a large number of people commute to employment areas where light industrial activities are located, including

- North Harbour Industrial Estate
- Wairau Valley
- Penrose/Mt Wellington/Onehunga
- Henderson
- East Tamaki (Highbrook)
- Auckland Airport

The mode of travel for the majority of these trips will be by private car, as frequent and reliable public transport connectivity does not exist to all areas, noting also that many light industrial businesses include shift work which makes catching public transport less attractive due to off peak reliability and safety.

Figure 1: Commuter travel patterns (2018 Census)

North - Silverdale/Whangaparāoa	Northwest - Whenuapai/Hobsonville/Kumeu
	
Number of commuters to prominent light industrial employment areas – 3,800	Number of commuters to prominent light industrial employment areas – 2,300
Estimated annual private vehicle kilometers travelled (vkt) – 50 million	Estimated annual private vehicle kilometers travelled (vkt) – 20 million
Reduction in vkt if 15% work locally – 7 million vkt	Reduction in vkt if 15% work locally – 3 million vkt
Reduction in vkt if 30% work locally – 15 million vkt	Reduction in vkt if 30% work locally – 6 million vkt
Reduction in vkt if 45% work locally – 21 million vkt	Reduction in vkt if 45% work locally – 9 million vkt

Providing employment opportunities closer to the new residential areas established about Auckland's fringe (Whenuapai, Silverdale and Pukekohe) is a critical piece to achieving positive transport outcomes for the region, as it

- Reduces the reliance to travel across the region to access jobs, which are predominantly being accessed by private vehicle travel
- Locating employment opportunities about the residential growth areas will have a positive community effect, providing the ability to live, work and play about the same suburb, and substantially reduce vehicle kilometres travelled
- Allows more focussed public transport connections/routes to be established. Each area (Whenuapai, Silverdale and Pukekohe) has a nearby RTN station and therefore has the ability to extend or provide shorter and frequent local bus services between residential and employment areas as they develop

- Each area already has established connectivity to the state highway network, providing safe connectivity for road freight and vehicle-based employment related trips.

The AFDS ignores key accessibility challenges faced by Auckland growth areas as set out in the Auckland Transport Alignment Project Evaluation Report and does not contribute towards reducing vehicle kilometres travelled for those residential areas already established/establishing about the outer areas of the Region.

3 TRANSPORT TRIGGERS

The AFDS proposes to introduce infrastructure triggers at Appendix 6 that are required to be implemented prior to areas being development ready, with the proposed timings set out in Appendix 8.

The timing of areas being 'development ready' consider all infrastructure requirements. Our assessment has considered transport matters only, noting that other infrastructure (such as services) may be the primary purpose for the proposed delay. The number of transport triggers however is large and forms a significant obstacle in how land development can occur over time.

Transport projects listed for most part are those set out in the Regional Land Transport Plan (RLTP) which also tie back to the Auckland Transport Alignment Plan (ATAP). At Appendix 3 of the AFDS, it notes that two key transport documents are currently being finalised, being the Auckland Rapid Transit Plan (ARTP) and the Tāmaki Makaurau Integrated Transport Plan (TMTP). As such, projects and project timeframes are subject to change.

Issues with the AFDS transport triggers include

- It is proposed that Council will be stringently adhering to the infrastructure timeframes set out in the AFDS, however, the AFDS also allows timeframes to be reviewed. Using infrastructure upgrades such as Mill Road as an example, it is not reasonable to have development areas controlled by projects where funding may be redirected, be brought forward/pushed out or removed altogether, which can be based on decisions at a government political level, and therefore out of the control of Council
- The extent of several projects is significant, such as Mill Road, the North Shore Rapid Transit (extension to Milldale), North-west Rapid Transit and SH16-SH18 Connections. The AFDS does not give regard to how these upgrades may be staged, or how interim interventions put in place by the transport authorities may deliver or assist in delivering suitable short to medium term network improvements. For example,
    - a new Westgate bus station and improvements along SH16 for buses currently being implemented will improve public transport attractiveness and reliability for the North-west, such that the effect between the ultimate outcome (North-west Rapid Transit) and the interim outcome may be relatively minor (more resilient) when considering the timing of development
    - The recently completed Northern Corridor Improvements extends the Northern Busway to Albany and therefore assists with improving bus reliability for bus users to the North.

The provision of bus shoulder lanes in the future on SH1 to Silverdale, where limited interchange crossings exist would present a feasible, reliable and low cost alternative that benefits bus users, with improved frequencies for local service delivering a viable medium term solution. This approach is being applied to SH16, so would seem reasonable for SH1 North.

The above examples will help provide alternative travel options for the outer residential areas but may remain inadequate when providing attractive, efficient connectivity to key employment hubs located about the Auckland Region.

- Areas have been grouped (such as Riverhead with Kumeu and Huapai) and are therefore subject to wider area upgrades that do not necessarily impact on the safe and efficient accessibility of the area. That is, it is reasonable to tie development within Riverhead to the Brigham to Waimauku SH16 upgrade, but Riverhead should not be tied to the delivery of the Alternative State Highway (Kumeu Bypass) corridor or North-west Rapid Transit extension to Huapai which provides much needed transport improvements to the Kumeu-Huapai area, not Riverhead.
- The AFDS should not prohibit development where safe transport solutions can be addressed prior to the ultimate corridor upgrade being delivered.
- Corridor upgrades listed for areas do not only address transport (safety, active modes and capacity) but also include a significant amount of land and cost to improve stormwater improvements, for example, the Coatesville-Riverhead Highway upgrade. Long term connectivity opportunities exist for active modes when addressing corridor issues together, but cannot be achieved in isolation.
- As with current plan changes, safe, effective and efficient solutions are being delivered by private developers within the existing road reserve which address transport effects of private development. Therefore, it is unreasonable for the AFDS to tie the development of private land to transport upgrades, as private land requires third party land acquisition which only the regulatory authorities can acquire.

The logic of including strategic transport triggers to development areas which have a cost well in excess of what the Government (either locally or centrally) can progress is unreasonable. The assessment of Private Plan Changes could be improved, where development progressing prior to transport upgrades outlined in the RLTP need to demonstrate how the development will manage/control effects, such that the effects are mitigated.

The AFDS, while attempting to align the implementation of strategic transport infrastructure prior to development is not reasonable for the reasons outlined above. The current framework which includes placing land use and infrastructure upgrade triggers into planning provisions allows the opportunity for developers to progress (working with the road controlling authorities) transport upgrades which inevitably saves the roading authorities money.

4 CONCLUDING COMMENTS

An issue which exists with the delivery of transport networks, is having no easy mechanism to obtain targeted rates or contributions from land use development that can then contribute towards infrastructure that predominantly serves the area. Until a mechanism exists, the ongoing issue of ranking the region's transport priorities will always fall to where there is greater return on the investment.

Based on the current benefit framework, this is always going to direct investment where the greater demand/population exists and therefore starve investment the further out development is from the Isthmus.

The commuter travel patterns give two examples where a lot of traffic passes through Auckland. While efforts are being made to improve connectivity through active modes and public transport interventions, land use interventions also need to be part of the short to medium term solution. That is, ensuring employment opportunities exist where people live, ensuring schools (primary, secondary and tertiary), and community services such as libraries, medical centres, and hospitals exist so that cross city travel by private vehicle is minimised. We need a balanced approach to development, and land use plays a significant part of this. Rather than push certain growth areas out, we need to consider how balanced growth in areas helps achieve an efficient and feasible transport system, especially where there is currently an imbalance between residential, employment and community services in the outer areas of Auckland.

Should you wish to discuss any of the above further, please contact me on [redacted].

Yours sincerely

[redacted]