Future Development Strategy

Local Board Not Supplied

WRITTEN FEEDBACK
Volume 3

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Future Development Plan 2023 #8136

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

#8136

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.

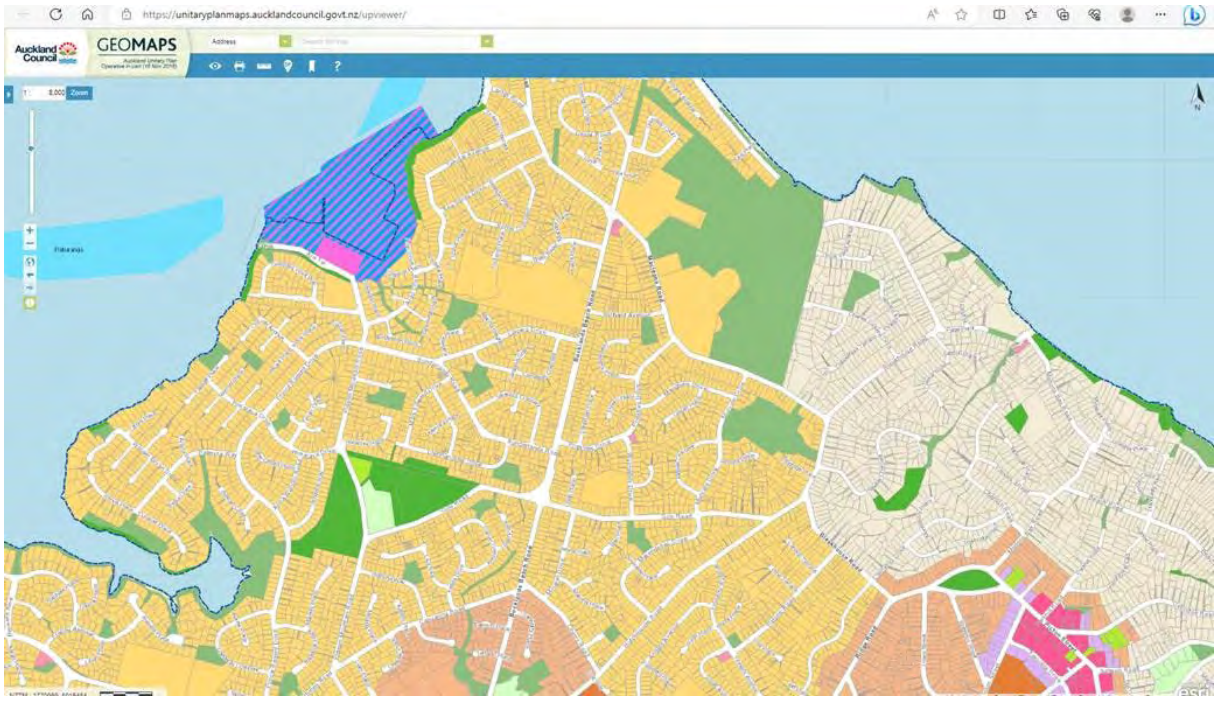
3.14 As such, capacity enabled by PC 78 cannot properly be classified as "plan enabled" and the uncertainties regarding the actual capacity that will be enabled indicate that the Draft FDS is significantly premature.

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

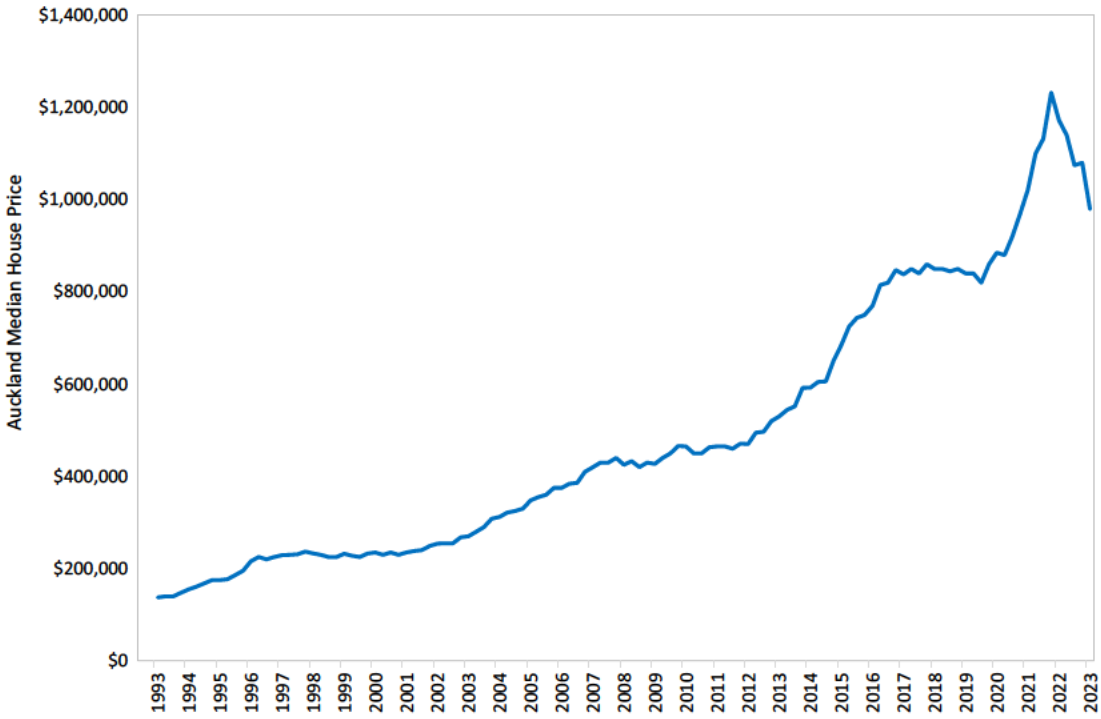
5.11 The Draft FDS also does not properly consider the serviceability or commercial feasibility of the identified development capacity.

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

#8136

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

INSIGHT | ECONOMICS

#8136



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%**

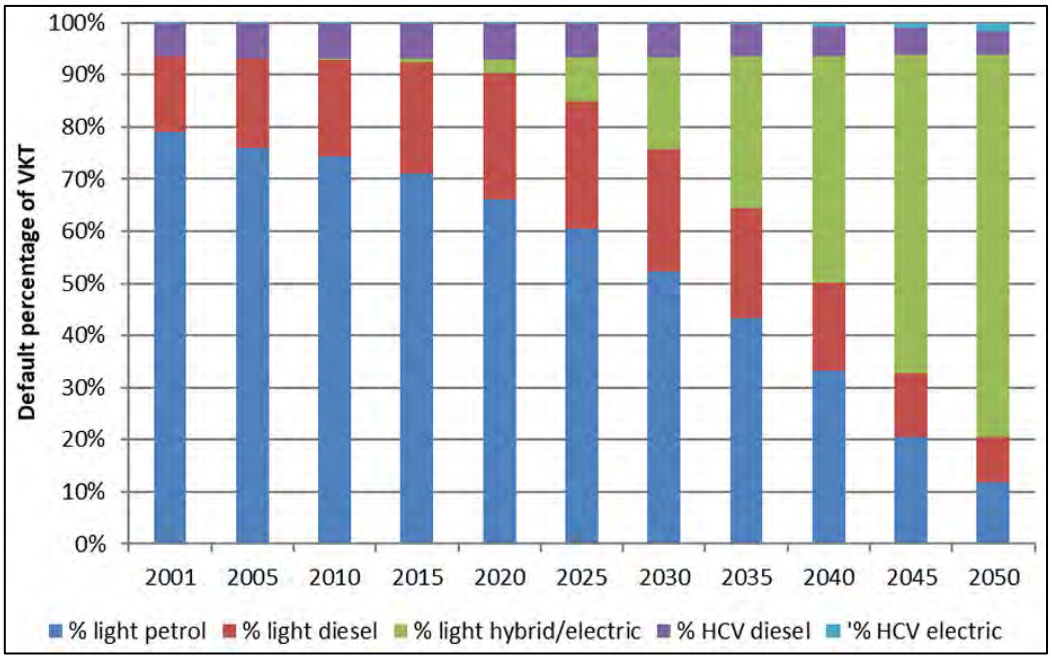
4.4.3 Car CO_2 Emissions Are Falling Rapidly Already

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.

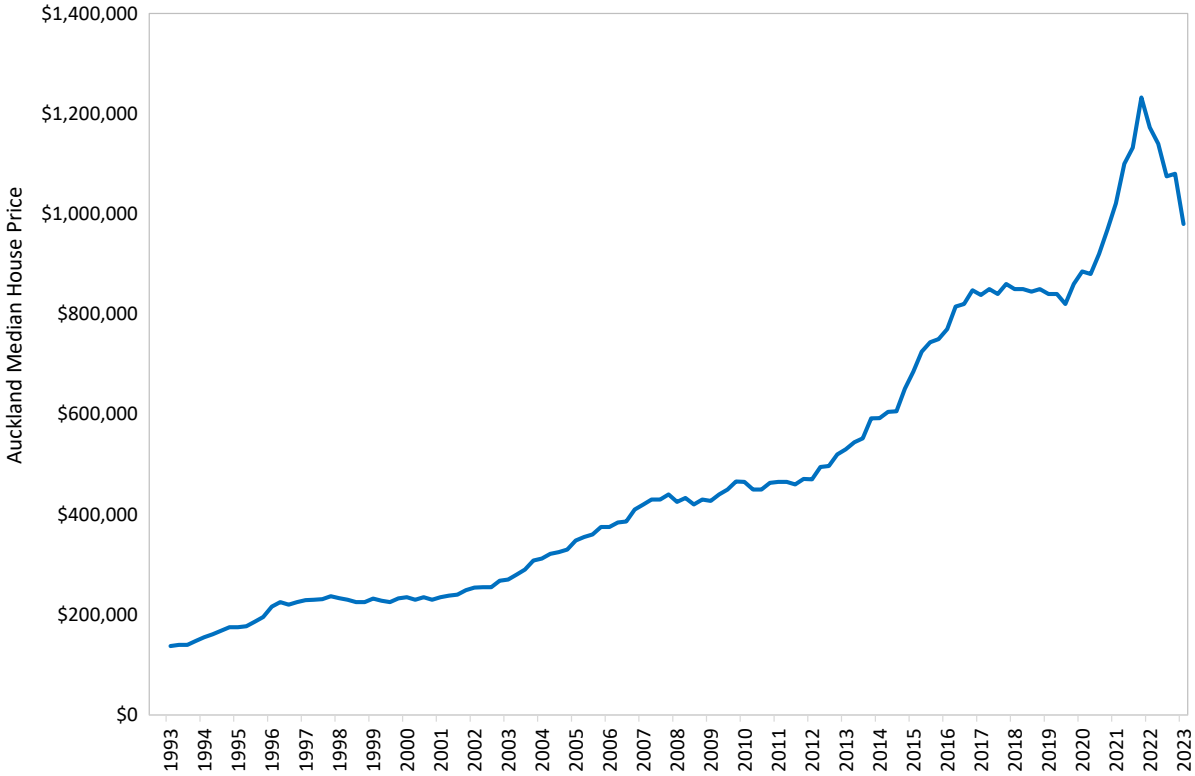
For context, the chart below shows how Auckland's median house price has tracked over time. While it has climbed steadily since the early 1990s, the region's median dwelling price has fallen precipitously from about mid-2021 onwards (when the FDS' modelling appears to have been done). In fact, the median 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

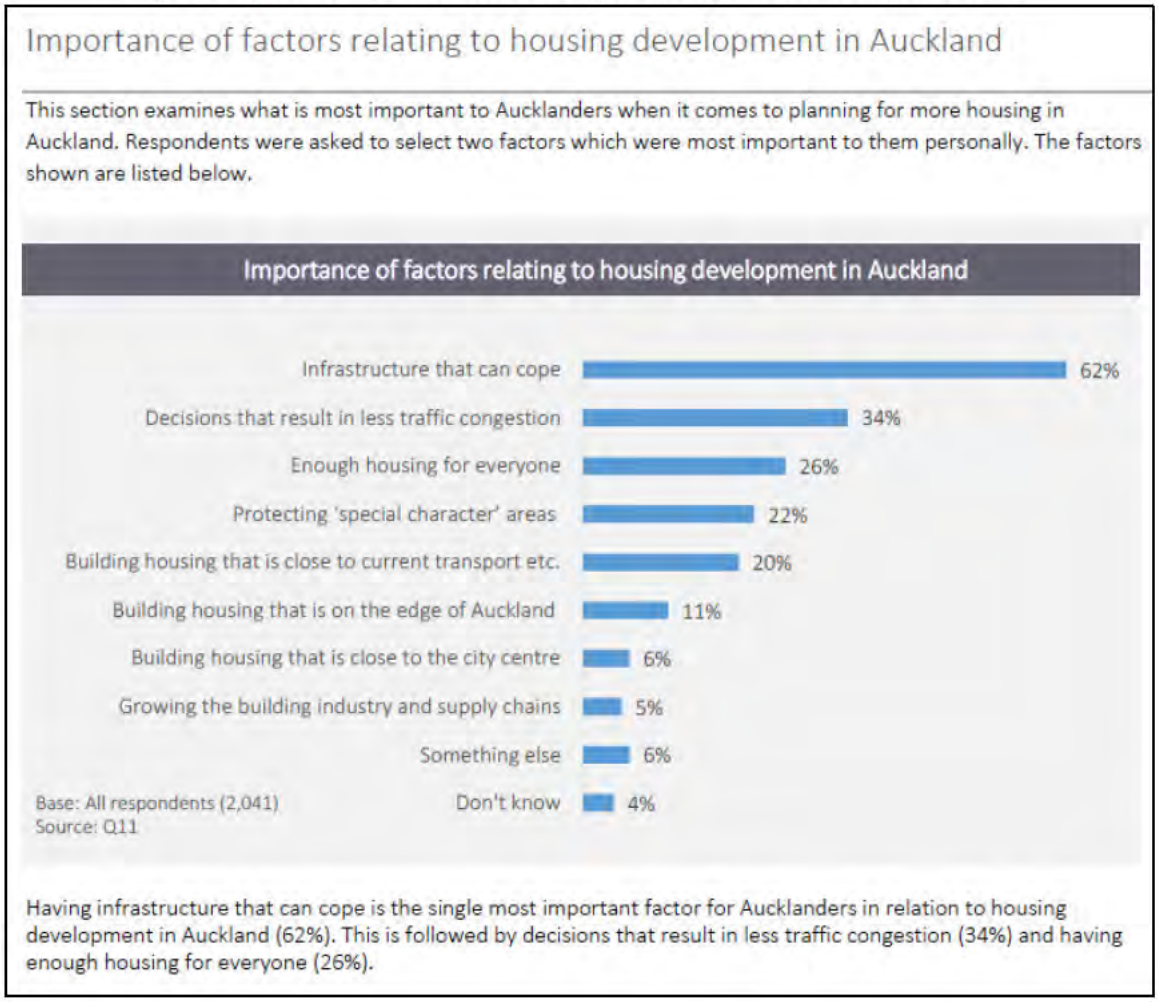
motivates developers to take risks and initiate new projects. Increased investment and development activities contribute to economic growth and job creation.

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."*

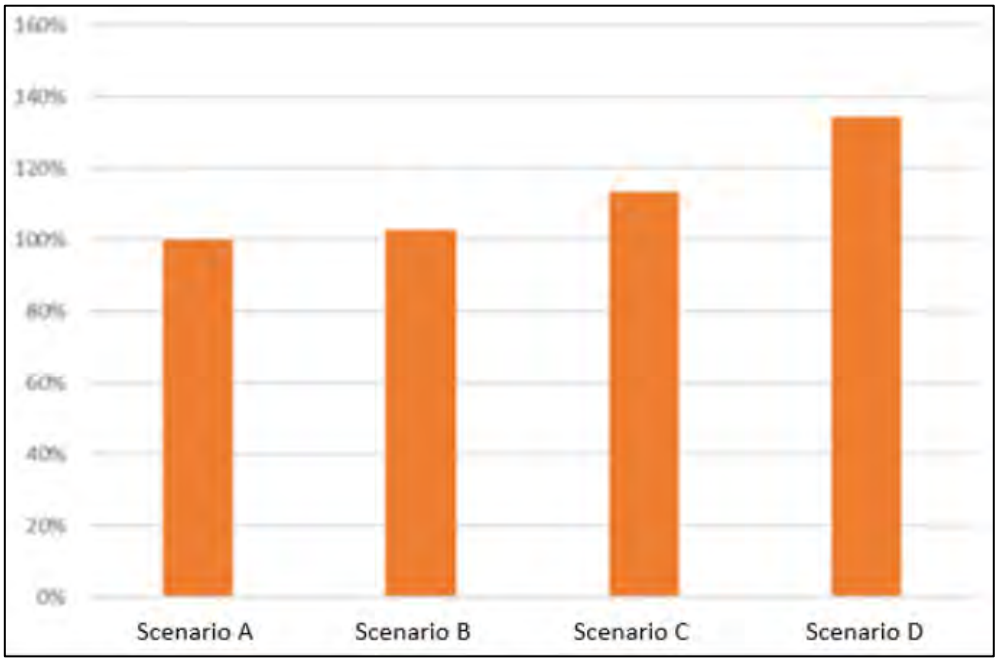
We challenge this conclusion on several grounds. First, the process used to quantify the infrastructure costs of each option are not explained. According to the GSER, infrastructure criteria were evaluated via subject matter expert input, which seems wholly inadequate given the cost and importance of 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

#8136

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

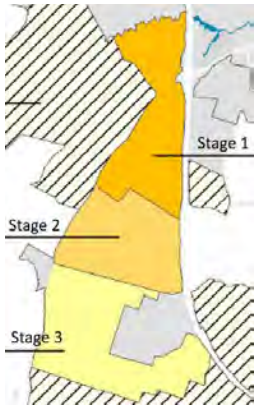
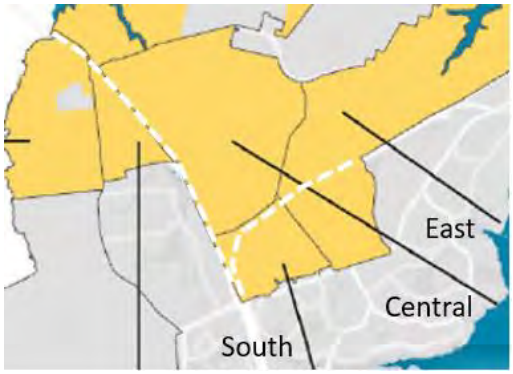
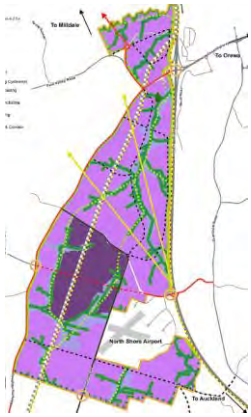
Area	Silverdale/North	Whenuapai/Northwest	Pukekohe/South
Location Map			
Structure Plan	Silverdale West Dairy Flat Industrial Area Structure Plan, April 2020	Whenuapai Structure Plan, September 2006	Pukekohe-Paerata Structure Plan 2019

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 #8137

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

Please refer to attached submission

Accessible local centres

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

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

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

Other

Tell us why

Please refer to attached submission.

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 attached submission.

Resilient infrastructure

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

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

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

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

Other

Tell us why
Please 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.

#8137

Summerset Group Holdings Limited
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Website: www.summerset.co.nz

SUBMISSION ON DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY

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

Summary

1. Summerset is one of New Zealand's leading and fastest growing retirement village operators, with more than 7,400 residents living in our village communities, offering a range of independent living options and care, meaning that as residents' needs change, they have support and options within the village. Summerset has 39 villages which are either completed or in development and a further 11 greenfield sites, spanning from Whangārei to Dunedin, and employs over 2,400 staff members across its various sites.

2. Summerset welcomes the opportunity to submit on the Draft FDS, which proposes changes to the vision for how and where Auckland is to grow over the next 30 years, to achieve the best outcomes for the region. Due to Summerset's active involvement in land development (including resource consent and private plan change processes) across Auckland, it is highly familiar with the subject matter of the Draft FDS.

3. In its current form, the Draft FDS fails to comply with the requirements of the National Policy Statement on Urban Development 2020 ("**NPS-UD**"). In particular the Draft FDS:

   (a) does not provide for sufficient development capacity, and places too much reliance on intensification anticipated to be enabled through Plan Change 78 ("**PC78**") to provide for that capacity, despite PC78 still being in its infancy, the plan change process currently paused, and the outcomes of that process yet to be determined;

   (b) 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 master planned, well-integrated development;

(c) 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

(d) applies overly blunt principles to development in areas subject to natural hazard risks.

4. Summerset is concerned that inadequate consultation has occurred in the preparation 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, Summerset considers further work is required by Auckland Council to ensure the Draft FDS fulfils the requirements of the NPS-UD. Summerset seeks that:

(a) the Draft FDS's consultation period under section 83 of the Local Government Act 2002 be further extended to allow further work to be undertaken by the Council to identify areas appropriate for intensification – the extension to 31 July is acknowledged, but is considered insufficient given the work to be undertaken, the significance of the FDS for future RMA processes, and hazard identification processes ongoing following Cyclone Gabrielle and the Auckland Floods; 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

6. The NPS-UD provides the legal basis for preparing 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.

7. The purpose of the Draft FDS is to promote long-term strategic planning by setting out how the Council intends to achieve well-functioning urban environments in both its existing and future urban areas, and provide sufficient development capacity as required by the NPS-UD over the next 30 years. The FDS is also intended to assist the integration of planning

[1] NPS-UD, clause 3.12.
[2] NPS-UD, clause 3.12(1).

decisions under the Resource Management Act 1991 ("**RMA**") with infrastructure planning and funding decisions.[3]

8. The NPS-UD sets out a prescriptive criterion of sources of information that must be considered in informing the Draft FDS. This includes:

   (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;

   (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.[4]

9. Once an FDS is prepared, the Council will be required to have regard to it when preparing or changing RMA planning documents.[5] On that basis it has the potential to significantly influence RMA decision making processes.

10. The primary reason for, and fundamental direction of the NPS-UD, is to address the issue of insufficient appropriately zoned land to meet housing and business development demand. In light of that 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. Summerset considers this is fundamental to the application of the NPS-UD, as it indicates that the NPS-UD is not intended to be incorporated into plans in a blunt manner. Rather, regard must be had to nuances of specific environments, including the appropriate type, scale and location of housing, depending on the particular context.

Providing for sufficient development capacity

11. As mentioned above, 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

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3 NPS-UD, clause 3.13(1).
4 NPS-UD, clause 3.14.
5 NPS-UD, clause 3.17.

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.[6] In light of those requirements, Summerset considers that the Draft FDS does not fulfil the requirement of delivering sufficient development capacity, given it limits development capacity and places even greater load on existing infrastructure, which in many cases, are already at, or exceeding capacity.

Over reliance on PC78 to deliver infill capacity

12. 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] However, while the Council in the Draft FDS considers that the feasibility of plan enabled development changes improves over time, as new amenities are created and accessibility through transport investment improves, it also considers that the plan enabled capacity far exceeds infrastructure capacity - existing, planned or likely - in many locations.

13. The Council's approach is fundamentally flawed because it places significant reliance on PC78 in determining plan enabled development capacity in the region. Given PC78 is still in its infancy, and has been paused, a conservative approach should be taken in determining development capacity, both in terms of overall supply and location because:

(a) Natural hazards work is still being undertaken. 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 (this being one of the critical reasons PC78 was paused to begin with). 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. It cannot be the case that greenfield areas are being precluded 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 and consistently, and at such a time where more certainty on the relied upon assumptions under PC78 are clarified and at the very least more certain especially when making such a fundamental assumption underpinning the FDS.

(b) 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.

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

(c) 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 develop or may not have the supporting infrastructure to enable those developments. Other factors such as cross-lease, unit, and leasehold titles for many properties will also further restrict developers' ability to intensify and meet those projected forecasts.

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 alone to provide sufficient long-term development capacity, as is required under the NPS-UD. Perversely, if the FDS is confirmed before PC78 is finalised, PC78 will be required to have regard to the Draft FDS as currently proposed, perpetuating poor development outcomes.

15. 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). Summerset 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.

More nuanced approach to managing natural hazard risks should be provided for

16. The Draft FDS has also placed a strong emphasis on the New Zealand Coastal Policy Statement's policies directive avoidance of development in areas of coastal hazard risk,[8] to the extent its principles require the avoidance of further growth in areas exposed to hazards.[9]

17. Summerset is supportive of the approach to generally avoid areas at high natural hazard risk. However, there are a range of existing incentives on landowners and developers to ensure that any future development occurs in a way that appropriately manages those risks. Council's approach of blacklisting areas that could potentially be developed, subject to appropriate natural hazard mitigation, is overly blunt, especially when an appropriate engineering solution could be put in place that appropriately manages the risk.

18. In developing its approach to managing development in areas subject to hazards, the Council must consider other incentives that on developers to build good, high-quality developments that address, manage, and mitigate hazards. For example, more stringent building standards

8 NZCPS, Policy 25.
9 Draft FDS, at page 17.

needing to be met for obtaining building consent, or insurance. In some instances, new developments in coastal risk areas are expected to improve risk outcomes for properties in those areas, such as where a new development will fund or construct a sea wall that would not have otherwise been viable. Further work on a consistent, national approach to managing development in hazard risk areas, and managed retreat, is also expected to occur through the new Climate Change Adaptation Act. It is critical that the Draft FDS does not preclude or undermine that further work and risks unnecessarily constraining development in the interim.

Supply of sufficiently sized (and zoned) land

19. The Draft FDS notes that business land, specifically large format retail, has experienced issues with the supply of sufficiently sized land within the region to establish new development and business centres. The Draft FDS further acknowledges that several suitable sites for those business and commercial activities have been identified in future urban areas and recognises the need to protect and preserve those areas for those purposes.

20. Whilst not a large format retail developer, Summerset's requirements for sufficiently sized land that is appropriately zoned for its business operations are similar. It is entirely appropriate that the challenges of suitable land availability that large scale developments, such as aged care facilities face should be expressly acknowledged and addressed through the Draft FDS.

Loss of Future Urban Land

21. The Council through the Draft FDS is proposing to make significant changes to established future urban areas, in particular, by rolling back some areas that are already planned for development, investigating the potential removal of other areas deemed unsuitable for development due to natural hazard risks, and delaying with uncertainty the live-zoning of substantial amounts of the remaining future urban zoned land.

22. Those changes will lead to adverse outcomes and have implications on achieving the NPS-UD's objective of providing for well-functioning urban environments, by delaying or stopping a significant number of much needed new developments across the region. Given the ongoing housing crisis the region is experiencing, increasing supply of developable land and streamlining future development should be a key focus of the Draft FDS. However, as it currently stands, that focus is convoluted and significantly undermined by what is currently proposed.

Infrastructure funding constraints

23. 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; 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.

24. The Draft FDS appears to be underpinned by the premise that infill development utilising existing infrastructure, in light of its limited financial resources, is cheaper than greenfield development and preferred in the short, medium and long term. Summerset acknowledges that infrastructure investment is a complex challenge that requires a good understanding of development needs in the short, medium and long term. However, while often new greenfield developments have higher infrastructure costs upfront in the short term, which are then paid for over time through development contributions, it 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 (most recently to provide for greenfield development in Drury). From a practicability perspective, Council's development contributions policies and FDSs should complement each other, that is to say that the Council has the tools available to provide for 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 (for example, this is evidenced through the repeated instances of raw sewage being discharged in waterways and harbours during significant rain events), which may impact its feasibility for future upgrades (and therefore, tying into the development capacity of an area), should all be factors that urge Council to exercise more nuanced decision-making in relation to infrastructure investment. The end result of such an approach of favouring infill development (as proposed under the Draft FDS), may again lead to perverse outcomes from an infrastructure perspective, whereby old assets are attempted to be upgraded solely to try and keep up with capacity only to be at the mercy of what is an aging asset.

26. In Summerset's experience, unless public infrastructure funding is identified and provided for in a Long Term Plan and considered "in sequence", a disproportionate cost of infrastructure upgrades are funded privately. If Council is to restrict most new development to indiscriminate infill areas, Summerset is concerned that nearly all new development will not be specifically

identified in future Long Term Plans, and therefore, the development community will be left to carry a greater and more prohibitive share of the cost of public infrastructure upgrades.

27. Additionally, 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) provision of a greater variety of housing choices to meet the needs of the communities. For example, the housing needs of the elderly, those with disabilities, and young families are each going to be very different. The Council's analysis around the need for growth specifically notes and recognises Auckland's aging population, however, there is no reference within the Draft FDS as to how the aging population is to be accommodated or planned for. The reality is that aged care housing is far more challenging to accommodate through brownfield development. This is because brownfield is smaller scale, taller buildings and more restrictive in its ability to provide for accessibility, healthcare and ancillary services, and fit for purpose spaces for the elderly; and

(c) 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.

28. In addition, 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 clearly 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 therefore misaligned with Auckland's long-term plan, infrastructure strategy, and the NPS-UD.

29. Similarly, as it currently stands, with the Draft FDS removing greenfield areas from development, this will create additional pressure on existing live zoned land which will in turn significantly affect the value of property and land, in the midst of a housing and cost-of-living crisis. Retirement villages provide necessary social infrastructure for our aging population, and are typically developments dense in form that free up hundreds of houses as residents sell their homes and move in. However, the reality is that retirement villages require land of a scale that infill zoning cannot typically provide or accommodate. Council's deterrence of

greenfield development will lead to fewer housing and care options for the elderly, and exacerbate Auckland's housing supply and affordability crises.

Well-functioning urban environments

30. As currently proposed, the Draft FDS does not give effect to the objective of the NPS-UD to provide for well-functioning urban environments. In particular, 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 nodes. There is naturally less scope to achieve this integration through infill, as development operates within the constraints of existing, poorly planned, urban areas. Summerset acknowledges a good portion of development capacity must be provided through infill, but without careful planning (which PC78 is yet to demonstrate), this intensification will not contribute to well-functioning urban environments.

31. Critically, the NPS-UD 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.

Engagement and procedural concerns

32. In preparing the Draft FDS, the NPS-UD expressly requires the Council to engage with the development sector to identify significant future development opportunities and infrastructure requirements.[10] However, to date (and as acknowledged in the Draft FDS's evidence report), Council has only consulted with the development sector through a limited survey, and through engagement with the Property Council of New Zealand.[11] Summerset considers that Council's engagement thus far has been inadequate for meeting its obligations under the NPS-UD.

33. That engagement with the development sector is critical to ensure there is a connection between the Council's Draft FDS and reality. By failing to engage with the development sector in a comprehensive manner, Council will lack a good understanding of both current and future development projects in the pipeline and of the land requirements for those projects. This in turn will create a significant risk that the amount and location of urban land identified by the

10 NPS-UD, clause 3.15(f).

11 Auckland Draft Future Development Strategy – Overall Evidence Report, page 89.

Council through the Draft FDS will not reflect development realities and/or needs. That is exactly what has played out in practice here.

34. In addition, Summerset remains concerned that there is insufficient information and time available to properly give consideration to a proposal of such significance. Further time (beyond the July 31 extension) is required, given the further work the Council needs to do in order to demonstrate the Draft FDS is achieving the criteria of the NPS-UD. Summerset considers it appropriate that the Draft FDS be considered and crafted at the same time the next Long Term Plan is being developed and PC78 is finalised (per paragraph 37(c) below), to ensure that there is an overall level of consistency and workability between those instruments.

35. While the Draft FDS contains a section regarding implementation, particularly through an implementation plan, feedback on the implementation plan should be released for feedback in conjunction with the Draft FDS for public feedback, given how inherently interlinked the two documents are.

36. Finally, given the significance the Draft FDS has on Auckland's future development planning, Summerset considers that a more extensive consultative process is necessitated, rather than what Council has currently provided. To ensure that a proposal of such significance has been adequately consulted on with the public, and in the interests of natural justice, Summerset seeks that Council hold, at the very least, a robust formal hearings process (rather than a limited hybrid conference), which provides the public with the opportunity to provide further submissions and evidence to assist with deliberations.

Relief sought

37. Summerset seeks that:

(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 prepare and release the Draft FDS's implementation plan for consultation in conjunction with the Draft FDS for public consideration; and

(c) 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.

38. If the primary relief sought by Summerset, as set out above, is not accepted, then Summerset seeks that:

(a) appropriate greenfield development capacity is enabled, particularly for master planned comprehensive developments that cater for housing needs of vulnerable groups;

(b) infrastructure triggers are removed where serviceability is enabled through the use of existing tools;

(c) a more nuanced and risk-based approach is taken to natural hazards; and

(d) retain the existing Future Urban Zone and timings for live-zoning of Future Urban zoned land.

39. Summerset would be open to engaging further with the Council on the matters raised in this submission if that would assist the Council. If there is an opportunity to speak to the submission, Summerset would also be willing to do so.

Yours faithfully



Future Development Plan 2023 #8151

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Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Kia ora. Please see attached submission from the New Zealand Telecommunications Forum.
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TCF Submission to Auckland Council
On Auckland's Draft Future Development Strategy
31 July 2023

Introduction

1. Thank you for the opportunity to comment on the draft Future Development Strategy for Auckland.

2. This submission is provided by the New Zealand Telecommunications Forum (TCF). The TCF is the telecommunications sector's industry body which plays a vital role in bringing together the telecommunications industry and key stakeholders to resolve regulatory, technical and policy issues for the benefit of the sector and consumers. TCF member companies represent 95 percent of New Zealand telecommunications customers.

3. The focus of our submission is on the critical role that telecommunications infrastructure will play in the growth of Auckland. For example, quality connectivity (internet and phone) is essential to plans to address housing shortfalls through housing intensification, and to reduce emissions by having more places of business close to where people live.

4. We cover the following issues in our submission:

    a. Connectivity challenges that come from denser residential and commercial areas

    b. The role telecommunications can play in helping to reduce emissions

    c. Resilience issues and adapting to climate change

    d. Efficient and equitable infrastructure investments.

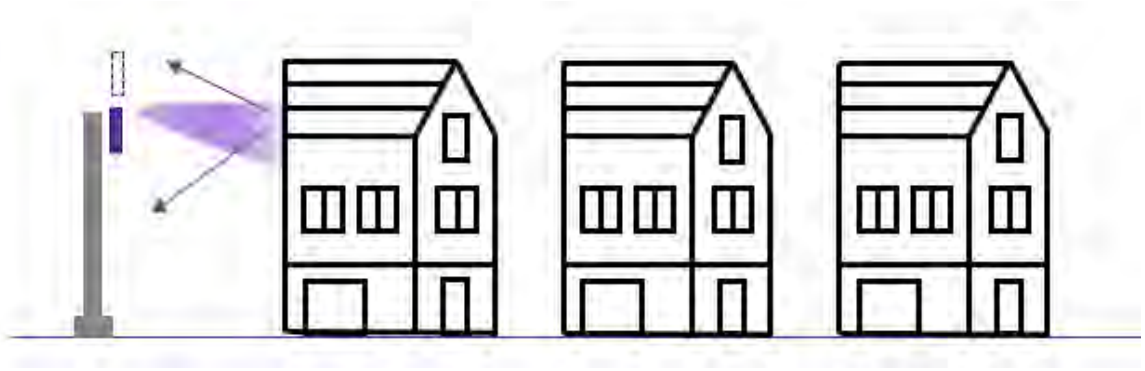
Telecommunications and the planning system

5. The planning system is both an enabler and a barrier to getting connectivity to the people of Auckland. The telecommunications industry engages with the planning system (and central government resource management laws) to be able to install, maintain and upgrade network infrastructure such as fibre optic cables, cell towers, poles and antennas. We apply for resource consents and designations, make submissions on plans and seek plan changes.

6. As the built environment of Auckland intensifies, so does our need to engage with the planning system. For example, suburban buildings are getting taller as medium density housing standards (MDRS) rules apply, permitting buildings up to 12 metres, taller than the permitted height for a mobile connectivity site. Wireless signals are more likely to be obstructed by buildings, and without mitigations we expect to see coverage blackspots appearing.

7. The first picture below shows the status quo. The second picture shows where we need to get to in terms of pole versus building height.

Wireless signals do not travel easily through obstructions, and this can result in blackspots within the wider network coverage areas (where customers are in the shadow of a building) and can lead to radio emission safety concerns. Tight equipment envelopes limit our ability to deploy new antenna for new growth or sharing.



The ideal height for mobile antennas is 5m taller than surrounding buildings and obstructions, with space for additional antennas used for sharing the mast and growth.



8. This will have an impact on the quality of mobile connectivity experienced by people in Auckland. We also expect this situation will increase resident concerns about radio emissions from towers. While existing towers broadcast from antennas that are typically above nearby residences, the same antenna will be located at a similar height to upper floors in a three to six story building.

9. There is also an issue where we use poles for street lights to co-locate telecommunications equipment. With local authorities deploying narrower and shorter streetlights of around six metres to accommodate LED lights, this reduces the height envelope for new cell sites.

10. In short the issue we have is one of pole height. The allowed heights under NESTF (the National Environmental Standards for Telecommunications Facilities) have not kept pace with changes in allowed building heights. While we have repeatedly raised this issue with MFE and MBIE, they have told us that changes will not be made under the RMA, and may not even make it into the first National Planning Framework. This means we need to seek resource consents or plan changes to be able to install mobile sites that are tall enough to avoid black spots. These processes take a lot of time and are very costly.

11. The Council can help address these issues by making changes to the Auckland Unitary Plan (AUP). Chapter E26 Infrastructure needs review and amendment to enable infrastructure to better support growth in Auckland. More specifically, the following provisions need updates:

    a. E26.2.3.1 activity table - network utilities and electricity generation – all zones and roads. With a focus on the activities A31 to A42, especially poles, cabinets and antennas in the road

    b. E26.2.5.1 activities within roads and unformed roads. With a focus on:

        i. clause (2) re building area

        ii. clause (3) re height

    c. E26.2.5.2. activities within zones in E26.2.3.1 activity table. With a focus on:

        i. clause (3) re height

    d. E26.2.5.3. specific activities within zones in Table E26.2.3.1. With a focus on:

        i. minor infrastructure upgrading

        ii. clause (6) re antennas attached to buildings

iii. clause (7) re standards E26.2.5.3(8) - (10)

iv. clause (8) re the maximum number of antennas

v. clause (9) re the maximum number of antennas in the Business – Local Centre Zone and Business – Neighbourhood Centre Zone

vi. clause (11) re masts and attached antennas identified as permitted activities in Table E26.2.3.1

e. E26.2.6. Assessment – controlled activities. With a focus on:

i. E26.2.6.2. re assessment criteria

f. E26.3. Network utilities and electricity generation – vegetation management

g. E26.4. Network utilities and electricity generation – trees in roads and open space zones and the notable trees overlay

h. E26.9. Network utilities and electricity generation – special character areas overlay – residential and business

i. E26.10. Network utilities and electricity generation – Sites and Places of Significance to Mana Whenua Overlay

j. E26.11. Network utilities and electricity generation – volcanic viewshafts and height sensitive areas overlay

k. E26.12. Network utilities and electricity generation – Auckland War Memorial Museum Viewshaft, Local Public Views, Ridgelines Overlays

l. Notification, review the need for mandatory notification of applications when required in E26.

12. The points we make below about the telecommunications sector's role in emissions reduction and resilience rely on these planning issues being addressed.

The role that telecommunications can play in emissions reduction

13. Principle one of the draft strategy talks about reducing greenhouse gas emissions. Ensuring all Aucklanders have access to quality connectivity will be key to reducing emissions. Internet access helps in a number of ways:

a. Avoiding transport emissions by enabling more people to work and study from home. This goes beyond connecting people virtually, to enabling secure remote access to systems and services, and monitoring of physical assets. A consequential life cycle assessment was undertaken in 2022 to measure how working from home one day a week affects the size of an employee's carbon

footprint. This study found that the average New Zealand office worker who works one day a week from home will save 4.2kg in carbon emissions per day, compared to commuting into the office every day.

b. Using smart technology to reduce energy consumption for individual households and public institutions such as schools and hospitals. This includes smart thermostats, heat pumps, and water heaters, and demand management technologies to support grid decarbonisation and reduce peak demand by controlling and coordinating energy heavy activities such as EV charging.

c. Using smart cities technology to help tackle climate change. For example, for traffic management, optimising refuse collection, monitoring pollution, optimising street lighting, ride sharing, energy metering, and switching on devices at times to optimise energy use.

5. The smart technologies we mention rely on sensors and telecommunications networks to record and relay data.

6. A recent study found that digital technology, as an enabler of a variety of actions, could collectively reduce annual emissions 7.2 Mt by 2030 - the equivalent of 42 percent of Aotearoa New Zealand's current emissions budget targets.

7. We recommend that internet access and digital enablement more generally be included as part of climate change mitigation part of the Future Development Strategy.

Resilience and adapting to climate change

14. Principle two of the draft future development strategy talks about adapting to the impact of climate change, and highlights the importance of resilient infrastructure.

15. As an industry, we are investing in the resilience of our infrastructure. However, resource management settings and local planning rules can be a barrier to doing this. For example, we use roadside cabinets to store telecommunications equipment and keep it safe from the elements. This includes equipment such as batteries which provide backup when power fails. The size of the cabinets dictates the amount of equipment that can be stored and consequently the capacity to enhance performance and resilience.

16. Similar to the pole size example discussed above, outdated provisions in the NESTF have not kept up with new technology and resilience requirements. Small increases to the allowed height and footprint of cabinets will address this. Without these changes telecommunications network providers need to seek costly and time consuming resource consents for each cabinet.

17. The Council can help address these issues by reviewing aspects of the Auckland Unitary Plan that affect telecommunications, especially the provisions concerning cell sites (pole height, antenna size and cabinet) located in the road. These are outlined above in paragraph 11.

Efficient and equitable infrastructure investments

18. Under principle three the draft strategy notes that ownership of the infrastructure that Aucklanders rely on is spread among different agencies with different priorities, meaning it can be difficult to get coordinated management and delivery. This includes privately owned infrastructure such as telecommunications.

19. The draft goes on to propose the introduction of integrated planning, to coordinate investment and planning. More integrated planning is something the telecommunications industry very much supports. The lack of planning to integrate infrastructure with land use development is a barrier to providing the connectivity that Aucklanders need. Too often connectivity is an afterthought in housing developments and road transport projects, reducing options and making the process of installing telecommunications infrastructure more expensive and time consuming.

20. When the Council is considering how to allocate its budget for critical infrastructure it needs to consider contributions from developers. It also needs to consider providing access to infrastructure funds to both publicly and privately owned infrastructure. The pace of new housing development in Auckland means it is not possible for network utility operators to fund new infrastructure in all places. This could slow down housing plans.

Questions about this submission

21. The New Zealand Telecommunications Forum would be happy to answer any questions about our submission. Please contact kim.connolly-stone@tcf.org.nz in the first instance.

Future Development Plan 2023 #8152

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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?

31 July 2023

Auckland Council
Via email: futuredevelopmentstrategy@aucklandcouncil.govt.nz

Submission on the Draft Future Development Strategy – NZ Storage

Introduction

This is a submission on the draft Future Development Strategy (**FDS**) on behalf of NZ Storage Holdings Limited (**NZ Storage**). The FDS was notified for submissions on 6 June 2023.

Background to NZ Storage

NZ Storage is a yard based storage business. It has experience in the requirements for and delivery of facilities that meet the needs of businesses that provide jobs and support the growth of the Auckland economy. NZ Storage has interests in land within the Drury West 3 area identified in the draft FDS. That land is close to road and rail transport infrastructure that has had significant public investment, can be serviced and is free from significant flooding or other natural hazards.

Summary of submission

Auckland Council (**Council**) is required to prepare an FDS in accordance with subpart 4 of Part 3 of the National Policy Statement on Urban Development 2020 (**NPSUD**). NZ Storage is supportive of the response to growth within Auckland being led by an FDS prepared in accordance with the requirements of the NPSUD. However, NZ Storage has significant concerns with the draft FDS as set out in this submission.

Meaningful consultation and engagement

As required by clause 3.15 of the NPSUD, a key part of preparing an FDS is ensuring it is prepared with genuine and meaningful consultation and engagement with the community, infrastructure providers, iwi and hapū, and land owners and developers. As has been the case with preparation of FDSs by other council in New Zealand, this engagement should be broad-based and encourage blue sky thinking, all informed by good quality evidence. Open communication ensures that the process is democratic and recognises that a wide range of parties will need to come together to implement the FDS. A failure to meaningfully consult risks the Council zoning land and/or providing infrastructure in less efficient locations – that outcome would be more expensive overall.

Along with achieving well-functioning urban environments in its existing and future urban areas, ensuring there is sufficient development capacity for business and housing is a key purpose of an FDS under clause 3.13. Land supply is a central aspect of ensuring sufficient development capacity for industrial land, as it enables opportunities for high-value businesses to grow and employ more people. Economic development of the region may be constrained if the draft FDS is not prepared properly, with negative consequences for the New Zealand economy as a whole.

Short-Term infrastructure constraints are driving the Long-Term Plan

Overall, it is apparent that short-term infrastructure constraints are driving the long-term strategic plan for Auckland. The short-sightedness of this approach and the lack of any meaningful public discussion is disappointing. We encourage the Council to take a long-term view, over a 30-year horizon as required by the NPSUD. NZ Storage accepts that the Council is facing a significant infrastructure deficit and that it needs to look to alternative forms of funding to pay for growth, including higher levels of direct government investment. If the Council and development sector work proactively together and look for opportunities, an appropriately prepared FDS provides the opportunity to negotiate this outcome with the Government in a comprehensive way. As it stands, the Council's unilateral approach to planning for growth in Auckland may help to suppress increases in general rates, but it fails to realise the longer-term and wider benefits of growth for the community.

Fundamental issues

In addition to these over-arching matters, NZ Storage considers that there are fundamental issues with the draft FDS that need to be addressed to ensure that the long-term strategic planning for growth results in a well-functioning urban environment. The matters raised illustrate that the draft FDS does not meet the minimum legal requirements set out by the NPSUD and therefore a restart of the process is the most appropriate and efficient outcome. If the draft FDS is not restarted then, as a less preferred alternative, NZ Storage seeks a number of changes to the draft FDS to at least address its significant concerns about proposed delays to sequencing of the Future Urban zone and in Drury.

In particular:

- NZ Storage is concerned that the Council has not completed its assessment of business demand and capacity and therefore the evidence base for the FDS is deficient. Further transparency and rigour is needed in relation to the analysis that has informed the location and sufficiency of business land.
- NZ Storage considers that any change in sequencing of future urban areas needs to be based on robust evidence informed by spatial analysis and not driven by current infrastructure limitations.
- NZ Storage does not support the delay in sequencing of the future urban zone land at Drury to 2035+ given the significant infrastructure investment already underway in Drury and seeks amendments to the FDS that reinstate the Future Urban Land Supply Strategy 2017 (FULSS) timing and which will result in more flexibility for the development community to respond to opportunities.

The submission below elaborates on these matters.

Demand and capacity analysis

Despite the draft FDS stating that it meets the statutory requirement under the NPSUD to ensure there is at least sufficient development capacity to meet demand, it is not clear from the draft FDS or the supporting growth scenario evidence report that this is actually the case. In particular, there appears to be discrepancies or a lack of evidence used to inform this assessment, and it is not clear how the

draft FDS meets the requirements set out in section 3.3 in relation to feasible and realisable capacity and the appropriate competitive margin.

In relation to business demand and capacity, the draft FDS is based on initial results from the Council's Housing and Business Capacity Assessment which is still in draft form. The draft FDS concludes that there is likely to be sufficient plan enabled business capacity on a region wide basis however, there will be shortfalls in sub-regions for specific business sectors, particularly land extensive sectors, which NZ Storage understands is approximately 1,000 hectares. Given that this assessment is based on plan enabled capacity and has identified capacity shortfalls for land extensive sectors, this does not appear to meet the NPSUD requirements and is a significant weakness of the draft FDS. NZ Storage considers that more transparency and rigour is needed around the capacity analysis for business land.

Growth scenarios for development

Clause 3.14 of the NPSUD requires that the draft FDS is informed by "consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS."[1] NZ Storage notes that while four growth scenarios have evaluated different levels of intensification and greenfield growth, this has been undertaken at a regional strategic level, with no understanding of the spatial composition of the different scenarios. In NZ Storage's view this analysis needs to be developed further with more detailed spatial analysis that evaluates:

- Feasible and reasonably expected residential development capacity on a sub-regional basis particularly to test the capacity assumed to be provided through intensification as opposed to greenfield growth.

- Location and sufficiency of business land especially for land extensive industrial businesses. This should include an analysis of the locations for potential new industrial areas, which will in turn inform locations for supporting proximate residential growth.

- There has been no Council-initiated industrial rezoning under the Auckland Unitary Plan (Operative in Part) of any consequence, and the approach to the draft FDS suggests it is unlikely there will be any more. The Natural and Built Environment Bill will significantly reduce the ability to promulgate private plan changes, so a lot will depend on Council strategies such as the FDS. Industrial land is already in short supply, and if future urban zoned land is not live-zoned within the programmed release timeframe, this situation will be exacerbated. As the supply of industrial land dries up, if Council is not rezoning additional land and developers are unable to, there will be enormous negative impacts on the wider industry and the Auckland economy.

- Further scenario analysis of intensification options that consider the location and scale of intensification achievable across the urban area, noting that a conservative approach to hazard management needs to be taken in urban areas as more capacity will be required elsewhere to make up for this.

- Further analysis of greenfield areas not included within the Future Urban zone is required. Noting that there may be new opportunities for development beyond those identified over 10

[1] National Policy Statement on Urban Development, clause 3.14(b).

years ago as part of the Auckland Plan and the original Future Urban Land Supply Strategy.[2] Input from the development sector would support this aspect of the scenario development and analysis.

- The ability to access employment and labour. The preferred scenario as it stands will result in fewer residents being able to access employment within a 30-minute commute because there will be a limited amount of local employment made available.

NZ Storage is strongly of the view that a different growth strategy may emerge as a result of more detailed analysis.

Sequencing and release of future urban land

The FDS is proposing to significantly push out the sequencing for release of future urban areas based on current funding limitations and will require the identified infrastructure triggers to be completed before any release of future urban land. NZ Storage is opposed to the identification of "infrastructure triggers" for significant areas of future urban land.

In particular:

- The analysis undertaken to identify the infrastructure upgrades required is likely to have been undertaken at a high level with no further explanation provided as to how the proposed triggers have been identified.

- The NZ Storage land is suitable to be urbanised, irrespective of the infrastructure triggers identified for Drury West (Stage 3) in the draft FDS. The land can be suitably serviced for three waters infrastructure by privately funded upgrades to existing public infrastructure and/or privately funded onsite water treatment solutions. Committed and planned transport infrastructure upgrades within the wider Drury can support urbanisation of Drury West (Stage 3) .

- The actual infrastructure requirements will vary depending on factors including the nature of the development, infrastructure solutions proposed and the status of development on neighbouring sites. Further, over time, infrastructure requirements and solutions are likely to change.

- The draft FDS will restrict efficient development and the ability to stage the release of land alongside progressive investment and development of innovative infrastructure solutions. This will delay or prevent much needed development capacity within the Auckland region from being realised.

- The approach to the release of future urban zoned land under the draft FDS will limit the ability for future decision makers to give effect to policy 8 of the NPSUD. Policy 8 requires local authorities to be responsive to plan changes that would add significant development capacity and contribute to well-functioning urban environments, including where the development

[2] Auckland Future Urban Land Supply Strategy, July 2017: https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/topic-based-plans-strategies/housing-plans/Documents/future-urban-land-supply-strategy.pdf

capacity is out-of-sequence with planned land release. NZ Storage consider that a rigid approach where all the identified infrastructure triggers must be in place prior to the urbanisation of any land would be inconsistent with this directive.

In summary, current infrastructure limitations should not be driving land use decisions and a long-term holistic approach is needed which:

- Identifies enough land for growth in the right locations where it can be delivered efficiently.
- Identifies what infrastructure is needed to support all future development (not just greenfield), and roughly how much will it cost, focusing on the next 10 years.
- If there is a funding gap, think creatively to find solutions, working in partnership with government and private sector.

Drury West

NZ Storage supports the future urban zoned areas in Drury being identified as a Priority Area for Investment (Years 11-30) and consider that the identification of development timing recognises the existing and planned urban growth within Drury. NZ Storage does not support the delay in sequencing of the future urban zoned land at Drury to 2035+ in the draft FDS from 2028+ identified in FULSS.

Drury is an area of transformation with a new metropolitan centre, train stations and significant infrastructure investment committed. This includes a new Drury West train station, electrification of the rail network between Papakura and Pukekohe, upgrades to State Highway 22 to improve safety and facilitate public and active modes, and strategic walking and cycling connections parallel to the North Island Main Trunk Railway Line. Given that significant investment is already underway, the draft FDS needs to provide flexibility for the development community to respond to opportunities within the Drury future urban zoned land and provide for the efficient use of government funded infrastructure.

Relief sought

NZ Storage requests and recommends that Council delay the adoption of the FDS to enable meaningful engagement with the community and development sector and to address the matters above. It is neither efficient nor appropriate to rush to finalise the FDS in light of the current pause on the Intensification Planning Instrument (Plan Change 78) process and the uncertainty around it given the upcoming election, as well as the status of some of the documents underpinning the FDS process (such as the Housing and Business Development Capacity Assessment, referenced above).

However, should an FDS be adopted it seeks that the Council:

a) Amends the Drury West (Stage 3) area in Figure 18 to a Spatial priority area for investment (Years 11-30) instead of Years 1-10.

b) Amends the sequencing of future urban zoned land at Drury West (Stages 1, 2 and 3) in Appendix 8 to 2028-2032 (as per the current FULSS) and change the FDS Response to "No response".[3]

[3] Draft Future Development Strategy, Appendix 8, page 38.

c) Amends the new timing of the future urban zoned land at Drury West in Figure 44 to 2025+ from 2030+

d) Amends the draft FDS to provide greater flexibility and enable the staged release of land, in line with progressive and innovative infrastructure solutions and policy 8 of the NPSUD.

e) Amends the draft FDS to specify how it will achieve sufficient infrastructure ready and suitable development capacity as set out in clause 3.3 of the NPSUD.

f) Provide further analysis of location and sufficiency of business land on a sub-regional basis to inform the adopted growth scenario.

Decision sought and hearing

In addition to the specific relief above, NZ Storage seeks such other alternative or consequential relief to give effect to the matters raised in this submission.

NZ Storage wishes to be heard in support of its submission. If others wish to make a similar submission, NZ Storage will consider presenting a joint case with them at the hearing.

[redacted]
(Person authorised to sign on behalf of submitter)

Address for Service

NZ Storage Holdings Limited
c/- Barker & Associates
[redacted]

Future Development Plan 2023 #8160

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

Refer to the attached submission prepared on behalf of NZ Agrihub Limited.

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

Refer to the attached submission prepared on behalf of NZ Agrihub Limited.

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

Refer to the attached submission prepared on behalf of NZ Agrihub Limited.

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

Refer to the attached submission prepared on behalf of NZ Agrihub Limited.

Other feedback

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

Refer to the attached submission prepared on behalf of NZ Agrihub Limited.

Saddleback
Strategy | Planning | Design

31 July 2023

Submission on

The Draft Future Development Strategy

On behalf of: NZ Agrihub Limited

Attention:	
Auckland Council	futuredevelopmentstrategy@aucklandcouncil.govt.nz

Introduction

This is a submission on the draft Future Development Strategy **(FDS)** on behalf of NZ Agrihub Limited **(NZ Agrihub)**. The FDS was notified for submissions on 6 June 2023.

Auckland Council **(Council)** is required to prepare an FDS in accordance with subpart 4 of Part 3 of the National Policy Statement on Urban Development 2020 **(NPSUD)**.

CLOC is supportive of the response to growth within Auckland being led by an FDS prepared in accordance with the requirements of the NPSUD. However, CLOC has concerns with the draft FDS as set out in this submission.

This submission has three parts:

Commentary on the Strategic Spatial Framework of the FDS;

Commentary on timing of infrastructure outlined in the FDS; and

1. A request that the Rural Mixed-Use Zoned land north of Ararimu Road, bound to the east by State Highway 1 and west by Great South Road (the Ararimu Road site), is identified as future business land.

Part 1: Sufficient Supply of Development-Ready Land: FDS Strategic Spatial Framework (Page 15)

Ensuring that there is sufficient development capacity for business and housing is a key purpose of an FDS under Clause 3.15.

Land supply is a central aspect of ensuring sufficient development capacity for industrial land, as it enables opportunities for high-value businesses to grow and employ more people. Economic development of the region may be constrained if the FDS is not prepared properly, with negative consequences for the New Zealand economy as a whole.

There are two primary areas of concern:

1. Existing Capacity

Section 1.2.4 (Page 6) details that the FDS builds on the previous iterations and replaces the 2018 Development Strategy yet no commentary or analysis about performance (theoretical verses v actual land releases) against the development targets has been provided. Based on this, does Auckland have sufficient capacity for previously forecast growth currently?

It would be helpful if this section set out the number of homes and jobs that have been established within the FUZ since Future Urban Land Supply Strategy 2017 (FULSS) was adopted, and how that compared with the FULSS sequencing.

NZ Agrihub therefore disagrees with:

the statement within Principle 5(c) (page 23) that *"The future development strategy identifies there is sufficient residential and business development capacity across Tamaki Makaurau".* No justification has been provided to support this statement, and is certainly at odds with market demand indicators for the industrial sector.

2. Development-Ready Land

The over-arching challenges (Section 2.3, page 12) clearly articulate that *"an uncertain and changing environment"* (Section 2.3.1), seeking to halt *"the ongoing degradation of the natural environment"* (Section 2.3.2) and financial constraints to infrastructure growth (Section 2.3.4) have materially impacted the supply of developable residential and commercial land – as evidenced by the proposal to remove some planned areas (see Figure 13, page 41) from 'Future Urban Area' allocation.

Such an indication raises serious questions over the assumptions underpinning growth modelling as to the rate at which areas indicated for future land uses can actually be converted to 'development-ready' land. Furthermore, other assumptions that underpin development capacity modelling needs to be reviewed include:

- The construction and finance industry's capacity to deliver projects of scale, and;

- Consenting ramifications in light of the principles (Section 2.5, page 15) being proposed to guide future development.

Therefore, in light of the restriction placed on land supply, NZ Agrihub agree with the statement in Section 2.3.4 (Investing in Infrastructure in a financially constrained environment) that: *"There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years."*

This being the case, Council should:

1. Be clear that the overarching objective is to maintain an adequate supply of developable commercial land; and,

2. Clarify that infrastructure investment is not necessary in some circumstances.

This submission therefore recommends that subheading in Section 2.3 "*Over-arching Challenges*" be amended as follows:

2.3.1: "~~Spatial planning~~ **Maintaining an adequate supply of development ready land in an uncertain and changing environment"**

2.3.4: "~~Investing in~~ **Provision of infrastructure in a financially constrained environment"**

We also seek that Section 2.4 "Spatial outcomes" includes an initial dot point: **"Tamaki Makaurau has an adequate supply of development ready land."**

Part 2: Timing of Infrastructure

NZ Agrihub agrees with the statement in Section S2.3.4 (Investing in Infrastructure in a financially constrained environment) that *"There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years."*

As detailed previously, Figure 13 identifies parts of the FUZ that have either been removed or are under investigation. This requires, as a minimum, some high-level commentary and explanation. For example, what proportion of the land that has been removed was allocated for housing, and what proportion was allocated for jobs?

Principle 5 (Enable sufficient capacity for growth in the right place at the right time – page 25) acknowledges that it is difficult to estimate where and when growth is likely to occur given the NPSUD requirement for Councils to be responsive to out-of-sequence development.

Other considerations raised are:

- Funding and financing pressures have increased (2.3.4, page 13).

- Smaller, distributed and nature-based infrastructure solutions (2.4.4, page 14) are largely untested and therefore challenging to get approved.

- A coordinated approach between agencies tasks with delivering the infrastructure is increasingly challenging (Principle 3, page 19).

This highlights the need for Council to be less rigid with both sequencing, but also how infrastructure can be funded. Private/public infrastructure agreements and targeted rates are potentially good solutions to ensuring that Council's infrastructure budgets aren't impacted by out-of-sequence development. This could be acknowledged in *Principle 5a: Direction for where and when growth is appropriate* (page 23).

This being the case, Council should be receptive to:

3. Out-of-sequence development where there are solutions to infrastructure provision, and;

4. Alternate methods of funding approaches enabled through the Infrastructure Funding and Finance Act 2020 (IFFA) and other private sector led initiatives.

This submission therefore recommends that following statements in Principle 5a (Directions for where and when growth is appropriate, page 23) should be revised:

> *"Unanticipated or out-of-sequence development create[s] major funding challenges for the Council, where funding of the necessary infrastructure has not been provided by other parties or means."*
>
> *Consideration of the trade-offs and costs that might occur when development occurs out-of-sequence, ahead of existing priorities, will be applied. For example, Council will support out-of-sequence development where funding for infrastructure can be secured via alternative means."*
>
> *Principle 5(b): Add final sentence: "However, Council could support development outside of urban areas where, for example, the natural environment is protected and a compact urban form can be achieved."*

Part 3: Rationale for Including the Ararimu Road Site

While large tracts of Auckland are rural (detailed in Section 4.2.3, *Rural Areas*, page 42), given the uncertainty and planned shrinkage of the FUZ, Council should be open to future plan change applications within the Rural Zone that meet the strategic objectives. These include:

- Can be designed to avoid risk from natural hazards;

- Protect/maintain the natural environment;

- Do not materially reduce the productive capacity of the region;

- Minimise adverse effects on rural character; and
- Are adjacent to existing FUZ/urban areas and/or key transport routes.

At the same time Section 4.2.4 (Business areas – *Greater access to employment,* page 46) notes that 46% of jobs are located in and around South Auckland.

This is without doubt a function of proximity to the international Airport, heavy rail infrastructure and another large population to the south in Waikato (Hamilton and surrounding areas). Therefore, these areas will continue to attract more demand for business than other parts of Auckland.

The Ararimu Road site

The Drury-Opāheke area, immediately north of the site, is identified as short-medium term priority (years 1-10) in Section 4.2.5 (Prioritising areas for development, page 50) and *Way forward*, (page 51). Figure 18 also recommends that, given the market demand, current activity in the area and good links to transport infrastructure, the FUZ land bounded by SH 1 to the east and Great South Road to the west are included in the Spatial Priority for investment (Years 1-10).

Neither of these recommendations are reflected in Figure 13, where the timing of release in these in these areas is identified as 2035+. Figure 13 needs to be corrected accordingly.

Given these factors, and the planned growth of business land surrounding the site (see Figure 16) in the Drury/Ramarama area expansion of the "Future Business Area" south must be considered.

While this land is currently zoned Rural-Mixed Use, it has a number of factors which indicate an ability to accommodate higher and better land uses, including commercial/industrial development:

- Land tenure is already heavily fragmented into smaller titles, making rural activity less commercially viable.
- There are a range of uses across the area and none of which appear to be highly productive.
- The proximity to a SH1 interchange (Ramarama).
- Excellent current (Great South Road) and planned transport links that will limit congestion and associated vehicle emissions.
- The additional business land can provide employment opportunities for residential areas nearby, opposite State Highway 1.

Structure Plan-Led Development

The FDS is aiming to build an "*integrated strategic approach for resilient urban, future urban, rural and business environments, that protect and restore the natural environment and make best use of infrastructure and scarce funding*" (Section 1.1, page 4)

Structure (or Framework) Plans are widely acknowledged as the best method to achieve this as they detail what needs to be achieved irrespective of underlying land ownership.

The area immediately north the of the existing metropolitan urban limit **(MUL)** boundary in Runciman, between Great South Road and the southern motorway, has been indicated for Business – Light Industrial. However, the delineation of the MUL in this location is difficult to fathom and appears to lack a compelling rationale (i.e. no 'defensible edge') and the planned Mill Road to Pukekohe Arterial Road traverses south of the MUL.

It should be noted that roads (like Great South Road) do not perform as 'defensible edges' as development will naturally gravitate to infrastructure corridors and transport routes (infrastructure-enabled development).

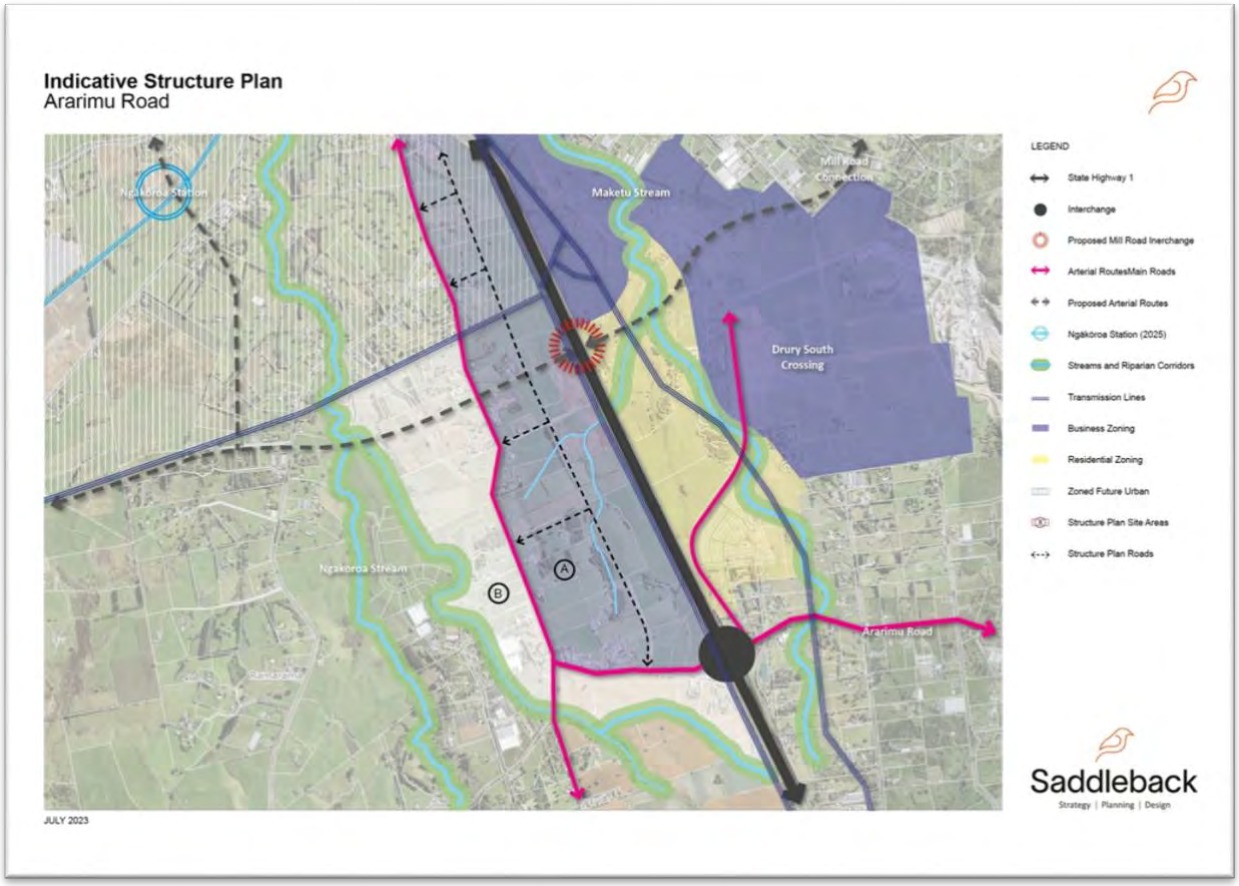
A defensible edge (from an urban design perspective) is established by natural watercourses and associated riparian margins, which in this case is the Ngakoroa Stream to the west, and main tributaries to this in the south.

This creates a fully-contained area of land which needs to be considered as Runciman South. Within this there are two land-use areas which naturally attract certain land uses:

A. Business/Light Industrial – due to the area sloping down to the motorway, ease of access to main arterials and presence high-tension power lines.

B. Business/Other – due to proximity to natural watercourses (and pedestrian/cycle paths anticipated for these)

Although Area A features the upper end of a tributary of the Te Maketu Stream (located on the eastern side of the motorway) it is a landscape feature 'within' the area, and not a divider of it. As such it can be assimilated within the design/ development of the area.



By starting with a focus on protection and restoration of key natural features, and assuming a low-impact engineering approach (including modal shift initiatives) a simple Structure Plan ca n be developed which:

- Provides for a significant area of future Business/Light Industrial (and other uses),
- Optimises the utilisation of existing and planned infrastructure – relieving pressure on scarce funding, and;

Consequently, Inclusion of the area detailed can deliver an integrated strategic approach sought by the FDS, provided for a range of sought after land uses in an appropriate areas and relieve pressure on other less suited urban development areas.

Recommendations and Requests

This submission therefore recommends that:

1. The area north of Ararimu Road, bound to the east by State Highway 1 and west by Great South Road be included into Figure 16 and 18; and,

2. That an avenue to accept private plan changes on rural land be provided for.

We request to be heard and be involved in further consultation in relation to this submission.

Kind regards,

[redacted]

Joe Gray

Principal Urban Planner
Saddleback Planning Limited

[redacted]

Bruce Weir

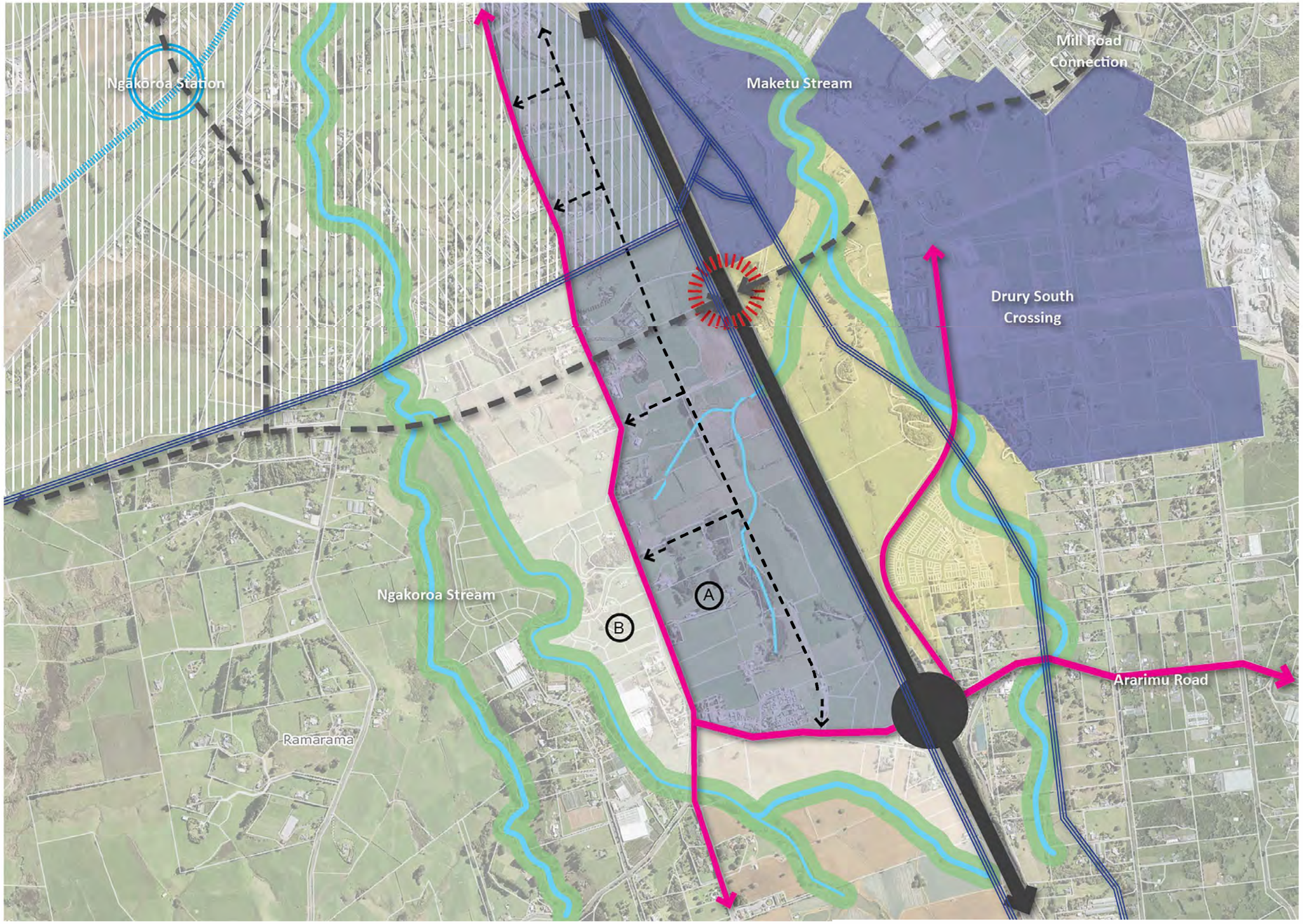
Principal Urban Designer
Saddleback Planning Limited

Appendix 1:

Indicative Structure Plan (NZ Agrihub)

#8160

Indicative Structure Plan
Ararimu Road



LEGEND

- State Highway 1
- Interchange
- Proposed Mill Road Inerchange
- Arterial RoutesMain Roads
- Proposed Arterial Routes
- Ngākōroa Station (2025)
- Streams and Riparian Corridors
- Transmission Lines
- Business Zoning
- Residential Zoning
- Zoned Future Urban
- Structure Plan Site Areas
- Structure Plan Roads

Saddleback
Strategy | Planning | Design

JULY 2023

Future Development Plan 2023 #8161

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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

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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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Tell us why

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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

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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?

#8161

31 July 2023

Auckland Council

Email: futuredevelopmentstrategy@aucklandcouncil.govt.nz

Draft Auckland Future Development Strategy 2053 Submission

1. Spark, Chorus, One NZ (formerly Vodafone), Connexa and FortySouth welcome the opportunity to submit on the Draft Auckland Future Development Strategy 2053 (**draft FDS**).

2. We wish to be heard in support of this submission.

Executive submission

3. We support the draft FDS, the prioritisation of development areas supported by public transport corridors and an improved public transport system. The focus as seen in principles 3 and 5 on aligning land use, and infrastructure that enables investment in the networks and projects that will support Tāmaki Makaurau.

4. Telecommunications is a critical infrastructure providing digital services essential to well-functioning urban and rural environments. We are concerned that the draft FDS does not really comprehend the importance of infrastructure such telecommunications and electricity to Tāmaki Makaurau and supporting the growth outcomes. The need for infrastructure integration is highlighted in various parts of the draft FDS such as in 3*.13 Key Themes* but this seems to refer to infrastructure that is publicly controlled.

5. We look forward to continuing work with Council staff on developing the framework for Council communication, working with infrastructure/network utilities to undertake more detailed infrastructure planning and explore the range of funding options available.

6. We support the TCF submission.

Telecommunications – critical infrastructure

7. Telecommunications providers (refer to Appendix 1) deliver critical communications infrastructure that connects communities, underpins key economic and social objectives and is a critical part of our response to climate change. Communications providers invest over $1.5 billion every year to maintain existing services, add capacity and resiliency to existing networks and connect new communities. Some of the investment relates to the cost of relocating existing cell-sites because of the increasing densification of urban areas.

8. In parallel, Spark, and One NZ are currently rolling out new 5G mobile networks, deploying over 1,000 new mobile sites and extending network coverage to regional communities. Connexa and FortySouth are essential partners in building the mobile network infrastructure. Chorus as a wholesale only provider of broadband services over fibre optic and copper networks. In late 2022 Chorus completed the final stage of the Ultrafast Broadband network build with fibre services now available to 87% of New Zealand addresses. Demand for fibre services continues to grow and Chorus recently connected their one millionth address to fibre. Chorus continues to expand its fibre network in urban and small rural settlements. Continuous network technology upgrades are needed to keep up with the increasing demand from consumers and businesses – exponential growth in the use of data is continuing and each year the amount of data handled by telecommunications networks roughly doubles. Chorus, Spark, One NZ, FortySouth and Connexa, along with other telecommunication providers, invest significantly every year in our networks to ensure New Zealanders have access to world class digital services.

9. The mobile, wireless and fixed line/fibre services that Spark, Chorus, One NZ, Connexa and FortySouth provide are a key part of our national infrastructure. Mobile communications have developed into an essential and critical function, supporting New Zealanders in all aspects of their lives. It is worth explaining a couple recent changes to the how we build and provide network due to Spark, One NZ and 2degrees selling most of their passive network to Connexa (Spark & 2degrees) and FortySouth (One NZ) are responsible for, building, owning, operating, and maintaining the mobile tower infrastructure which Spark, 2degrees

and One NZ attach their network equipment. Spark, 2degrees and One NZ remain telecommunication network operators providing customers the opportunity for digital connectivity. The diagrams in Appendix 2 give a general understanding of what each organisation is responsible for and highlight the split between passive structures and the active components of the Spark, 2degrees and One NZ wireless networks.

10. The influence of the telecommunications sector and its infrastructure is significant across the four dimensions of wellbeing: Economic, Social, Cultural, and Environmental. Mobil, wireless and fixed line/fibre infrastructure is critically important for the economy and peoples' wellbeing. Our services also allow consumers to contact friends and family, conduct business, be entertained, and engage with Government, medical, educational, and emergency services. Similarly, our sector will be a critical driver of productivity growth across the New Zealand economy in the near and long-term.

Telecommunication is important to Tāmaki Makaurau

11. We would like to take the opportunity to highlight the importance of telecommunications to Tāmaki Makaurau. Telecommunications infrastructure is nationally, regionally, and locally critical. It is fundamental to digital transformation of private and public (both social and network) infrastructure. Telecommunication networks, wireless and fixed line are a critical part of enabling New Zealand to successfully respond to climate change, monitor and enhance the environments that New Zealander's love. These networks enable the gathering and generation of data to better understand and respond to changes, especially environmental changes which are occurring at pace. Telecommunication network technology is continually developing and changing to meet customer expectations for new, faster, and uninterrupted digital experiences wherever possible they are. The continual challenge is finding locations to increase the density of the telecommunication networks to meet the demand generated by growth and development.

12. Well-functioning communities depend on recognising and planning for the all the core infrastructure including telecommunications, social infrastructure, three waters,

transport/movement, and electricity. There are interdependencies between networks especially on electricity. Urban systems are interdependent for example a poorly community with poor connectivity generates car dependency, which leads to air pollution, high carbon emissions, obesity and other health issues, degradations of local amenity, anti-social behaviour and loss of natural habitat.

13. Telecommunications and digital infrastructure are important for ensuring access for everyone including those who are vulnerable and disadvantaged. Ensuring that telecommunications networks are recognised, planned for, and constructed is critical part of planning for growth and development in the Tāmaki Makaurau as telecommunications:
    a. shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
    b. link people, enabling the flow of ideas and information.
    c. connect whanau, communities, business, enables new technologies and is becoming increasingly essential for accessing key services such as education, social, health, business, and government services.
    d. significantly contribute across the four dimensions of wellbeing: economic, social, cultural, and environmental.
    e. Ensuring access to quality connectivity will be key to reducing emissions.
    f. Avoiding transport emissions by enabling more people to work and study from home. This goes beyond connecting people and enabling secure remote access to systems and services and monitoring physical assets. A consequential life cycle assessment was undertaken in 2022 to measure how working from home one day a week affects the size of an employee's carbon footprint. One NZ commissioned Thinkstep-anz carry out a Consequential Life Cycle Assessment (CLCA)[1] which found that the average New Zealand office worker who works one day a week from home

[1] What does working from home do to your carbon footprint? (one.nz)

will save 4.2kg in carbon emissions per day, compared to commuting into the office every day.

g. Using smart technology to reduce energy consumption for individual households and public institutions such as schools and hospitals. This includes smart thermostats, heat pumps, and water heaters, and demand management technologies to support grid decarbonisation and reduce peak demand by controlling and coordinating energy heavy activities such as EV charging.

h. Using smart cities technology to help tackle climate change. For example, for traffic management, optimising refuse collection, monitoring pollution, optimising street lighting, ride sharing, energy metering, and switching on devices at times to optimise energy use.

i. The smart technologies we mention rely on sensors and telecommunications networks to record and relay data. Research from Spark and Thinkstep-ANZ[2] found that digital technology as an enabler of a variety of actions could collectively reduce annual emissions 7.2 Mt by 2030 - the equivalent of 42 percent of Aotearoa New Zealand's current emissions budget targets.

14. **We recommend** that FDS recognises telecommunication networks and digital enablement are an important part of climate change mitigation part of the FDS alongside initiatives in Principle 1.

Existing Unitary Plan Regulatory System needs Review

15. We rely on the Auckland Unitary Plan, especially Chapter E26 Infrastructure and the National Environment Standard for Telecommunication Facilities 2016, to build new networks to support the densification and spatial growth of Tāmaki Makaurau. As a consequence of the increasing buildings heights for medium density housing the Auckland Unitary Plan require updating. The TCF submission sets out the same challenges for the telecommunication sector. The NESTF permits poles/masts up to 3.5 metres taller than the surrounding streetlight poles. We

[2] Meeting The Climate Challenge Through Digital Technology (sparknz.co.nz)

attach antennas and other equipment needed to transmit radio signals to these poles.

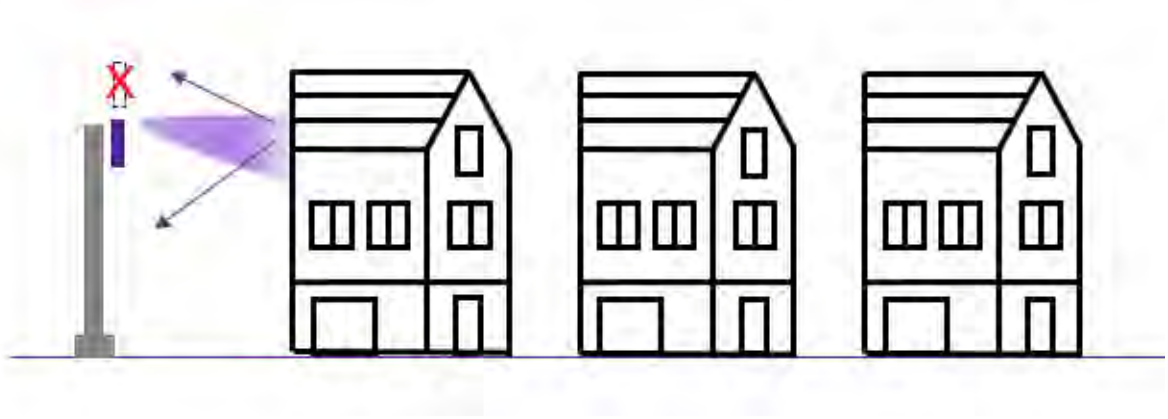
16. This rule was adopted because mobile antennas work best when they are around 5 meters taller than the surrounding buildings and obstructions. Radio waves do not travel easily through buildings and trees (refer to appendix 1 for examples of this "radio path loss").

17. With streetlights typically being 8 to 9 meters tall in suburban areas, the NESTF rule meant we could deploy poles up to around 12 metres and this provided sufficient height margin above the then typical single/double story suburban environment for mobile services.

The ideal height for mobile antennas is 5m taller than surrounding buildings and obstructions, with space for additional antennas used for sharing the mast and growth. This maximises coverage in suburban environments.



Conversely, wireless signals do not travel easily through obstructions, and this can result in blackspots within the wider network coverage areas (where customers are in the shadow of a building) and can lead to radio emission safety concerns. Tight equipment envelopes limit our ability to deploy new antenna for growth or sharing.



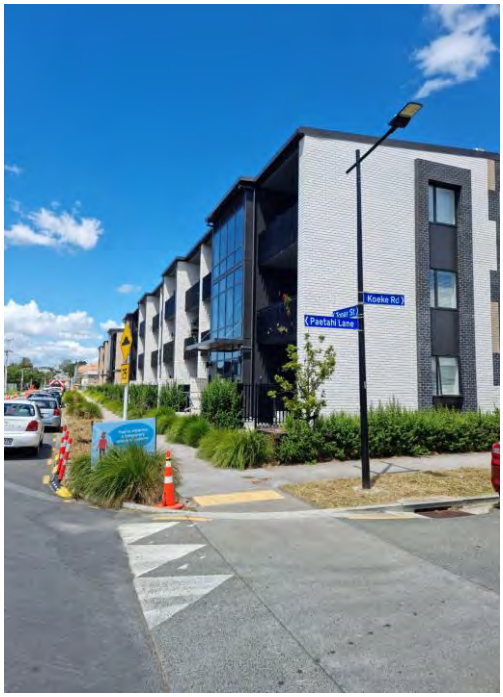
18. However, NESTF standards are becoming less effective over time as the urban environment changes:
    a. Local authorities are deploying narrower and shorter LED streetlights of around 6 meters. As masts can only be 3.5 metres taller than the surrounding streetlights, this means that in these areas we can only deploy masts to around 9.5 meters in height.
    b. At the same time, suburban buildings are getting taller as the MDRS rules apply. The MDRS permits buildings up to 12 meters and this is taller than the NESTF permitted mobile site (and significantly taller where LED streetlights have also been deployed).
    c. Urban forest initiatives mean an increase in the number and density of trees in the street berms. Trees - like buildings - impact on the coverage footprint of a cell-site.

19. These changes mean existing sites - and increasingly any new site planned in accordance with the NESTF - are shorter than the typical building height in suburban areas. As buildings and trees obstruct wireless signals are more likely to be obstructed by buildings and trees and, without mitigation, coverage "blackspots" appear. Customers loose service.

    <u>Example 1: new high-density developments where building heights exceed the NESTF envelope</u>

    The new Kainga Ora development being built in Northcote, Auckland. The light pole shown in the photo's measures approx. 6m tall and 155mm in width. The adjacent

buildings measure 10m and 15.6min height (four storey apartment building). We will not be able to provide additional coverage in this area using the NESTF as the NESTF only provides for new mobile sites up to 9.5m.





The Kāinga Ora Te Ara Awataha development is at risk of impaired coverage. The ideal scenario would be that the operators worked with the developers such as Kāinga Ora to design the network in new large redevelopments such as Te Ara Awataha in Northcote, Tāmaki Makaurau Auckland.



20. We don't know how quickly buildings will increase in height – the MDRS cost benefit analysis suggests a range of 5 to 10 years is not unreasonable[3] - but we will need to mitigate the impact on the network if we are to maintain existing services.

21. Operators can mitigate the impacts by increasing the height of existing towers or deploying new taller towers as part of ongoing network capacity augment. However, given the uncertainty of when and if pole heights will increase, operators have an incentive to avoid areas of potential high density where there is a high risk of having to relocate sites.

22. Further without amendment to the NESTF envelope, we expect this situation will also increase resident concerns about radio emissions from towers. Whereas towers within the NESTF envelope now broadcast from antennas that are typically well above nearby residences, the same antenna will be located at a similar height to upper floors in 3-6 story buildings.

[3] Page 82. PWC and MfE use this range for the purposes of the sensitivity analysis suggesting this not an unreasonable range over which the built environment outcomes could occur https://environment.govt.nz/assets/publications/Cost-benefit-analysis-of-proposed-MDRS-Jan-22.pdf

Example 2: new buildings adjacent to existing mobile sites that require the site to be reconfigured or turned off leading to coverage blackspots



578 Manukau Rd Epsom/Greenwood's Corner. This site will remain in place as it is too difficult to find another site to replicate the existing coverage and capacity. One or two additional sites will be required to correct the coverage footprint of the existing pre-development. We will need to turn off the antenna facing the building if we are unable to point it away from the building.

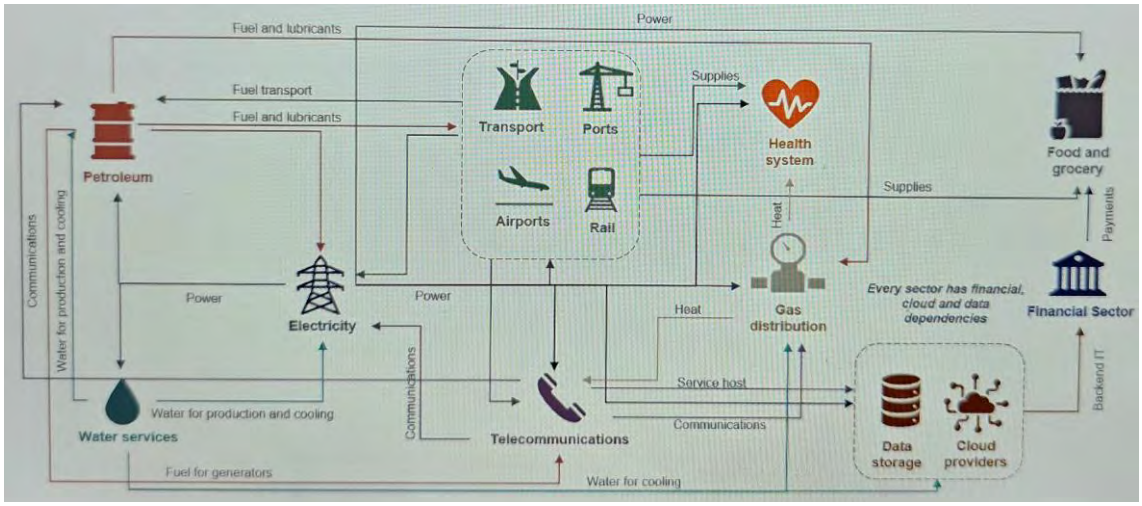
23. The FDS recognises in Appendix 12 that that the Unitary requires review. Chapter E26 Infrastructure needs review and amendment to enable infrastructure to better support growth in Auckland. More specifically, the following provisions need updates:
    a. E26.2.3.1 activity table - network utilities and electricity generation – all zones and roads. With a focus on the activities A31 to A42, especially poles, cabinets and antennas in the road.
    b. E26.2.5.1 activities within roads and unformed roads. With a focus on:
        i. clause (2) rebuilding area
        ii. clause (3) re height.

c. E26.2.5.2. activities within zones in E26.2.3.1 activity table. With a focus on:
    i. clause (3) re height
d. E26.2.5.3. specific activities within zones in Table E26.2.3.1. With a focus on:
    i. minor infrastructure upgrading
    ii. clause (6) re antennas attached to buildings
    iii. clause (7) re standards E26.2.5.3(8) - (10)
    iv. clause (8) re the maximum number of antennas
    v. clause (9) re the maximum number of antennas in the Business – Local Centre Zone and Business – Neighbourhood Centre Zone
    vi. clause (11) re masts and attached antennas identified as permitted activities in Table E26.2.3.1
e. E26.2.6. Assessment – controlled activities. With a focus on:
f. E26.2.6.2. re assessment criteria
g. E26.3. Network utilities and electricity generation – vegetation management
h. E26.4. Network utilities and electricity generation – trees in roads and open space zones and the notable trees overlay.
i. E26.9. Network utilities and electricity generation – special character areas overlay – residential and business.
j. E26.10. Network utilities and electricity generation – Sites and Places of Significance to Mana Whenua overlay.
k. E26.11. Network utilities and electricity generation – volcanic viewshafts and height sensitive areas overlay.
l. E26.12. Network utilities and electricity generation – Auckland War Memorial Museum Viewshaft, Local Public Views, Ridgelines overlays.
m. Notification, review the need for mandatory notification of applications when required in E26.

Resilience of Communities

25. In a few places in the FDS such as under 2.4.4 and Principle 4. sub-section 4.2.2 *Future urban areas* note the dangers of flooding and land stability as well as challenges with the resilience of infrastructure. The direction of the FDS is that development results in resilient built systems. We support the FDS actions around resilience including the removal of zoned areas for development at risk from natural hazards and events. How we consider that the FDS fails to recognise the impact that disruption to telecommunications, and other critical infrastructure, could have during an extreme natural hazard event, such as Cyclone Gabrielle.

26. The '*Strengthening the resilience of Aotearoa New Zealand's critical infrastructure*'[4] system discussion document outlines why a resilient critical infrastructure system matters for our country and people. The following diagram presented during a Critical Infrastructure webinar on 20 July 2023 by Te Waihanga and Department of the Prime Minister and Cabinet (DPMC) shows the interdependencies between critical infrastructure and impacts of outages in one sector can have flow on consequences for other sectors. Telecommunications and electricity are critical sectors our communities and the economy.



[4] https://consultation.dpmc.govt.nz/national-security-group/critical-infrastucture-phase-1-public-consultation/user_uploads/discussion-document--strengthening-the-resilience-of-nzs-ci-system.pdf

27. **We recommend** that FDS is amended to recognise that interdependencies between infrastructure sector especially telecommunications and electricity. It is essential that the existing and proposed growth areas have telecommunications infrastructure both wireless and fixed line integrated into the developments. Currently is does not happen under the existing regulatory regimes of the Unitary Plan.

If there are any questions regarding this submission, please contact Graeme McCarrison.

Ngā mihi

Graeme McCarrison
Planning and Engagement Manager - Spark
[redacted]

Colin Clune
Planning Manager - FortySouth
[redacted]

Fiona Matthews
Planning Manager - Connexa
[redacted]

Andrew Kantor
Planning & Engagement Manager - Chorus
[redacted]

Appendix 1 – Telecommunication Providers

Telecommunications infrastructure is critical and essential to a modern economy and connecting the 'system of systems' that supports New Zealand's economy and wellbeing of people and communities.

The Infrastructure Commission's discussion document on Infrastructure for a Better Future recognises the critical nature of telecommunications infrastructure. The report notes that 'Increasing reliance on communications makes telecommunications infrastructure more critical.'

Telecommunications plays a vital and important role in national resilience, demonstrated most recently through our national response to Covid-19, as recognised by the Infrastructure Commission: 'The Covid-19 pandemic is a reminder of the importance of a resilient, flexible and agile infrastructure system, as demonstrated, for instance, in the move to working from home, where telecommunications infrastructure has become a substitute for physical transport infrastructure.'
New Zealand has multiple layers of networks (wireless, IoT and fixed line, plus satellite) and providers include:

- Wireless networks of Spark, One NZ, 2 degrees and Rural Connectivity Group (RCG) (a joint venture between Spark, One NZ and 2 degrees
- Fixed line networks operated by Chorus nationally, Tuatahi First Fibre (previously Ultrafast Fibre Limited) throughout Waikato, Bay of Plenty, Manawatū-Whanganui, Taranaki and Enable in parts of Canterbury including Waimakariri. Note that Spark and One NZ have large fibre networks of their own.
- Connexa and FortySouth manage, and build passive infrastructure for network operators such as Spark, One NZ and 2degrees.
- Wireless Internet Service Providers (WISPs) – there are about 30 WISPs operating across Aotearoa – including Amuri Networks in Canterbury
- International companies e.g. Starlink (SpaceX service), Amazon, Google

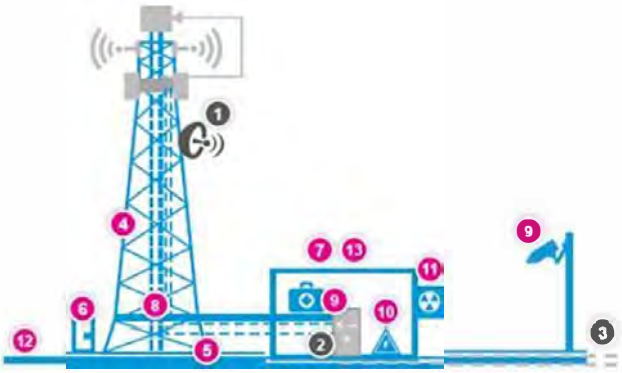
Our wireless telecommunications networks enable the provision of Emergency Mobile Alerts by the National Emergency Management Agency. These are messages about emergencies sent by authorised emergency agencies to capable mobile phones. The alerts are designed to keep people safe and are broadcast to all capable phones from cell towers within the emergency area.

Telecommunications infrastructure is a key enabler of future technologies that are expected to be one of the solutions to many of today's challenges, from climate change to lifting our productivity and innovation. The Climate Change Commission's final advice to the government for its emissions reduction plan notes precision agriculture as an example of the ways in which technology will help to improve efficiency and reduce environmental impacts in agriculture – it requires digital connectivity and networks to be possible.
The rollout of 5G and digital technology that it enables is critical to a well-functioning urban environment as it is widely expected to transform our cities and the ways in which we use other types of infrastructure.

Appendix 2 Connexa & FortySouth

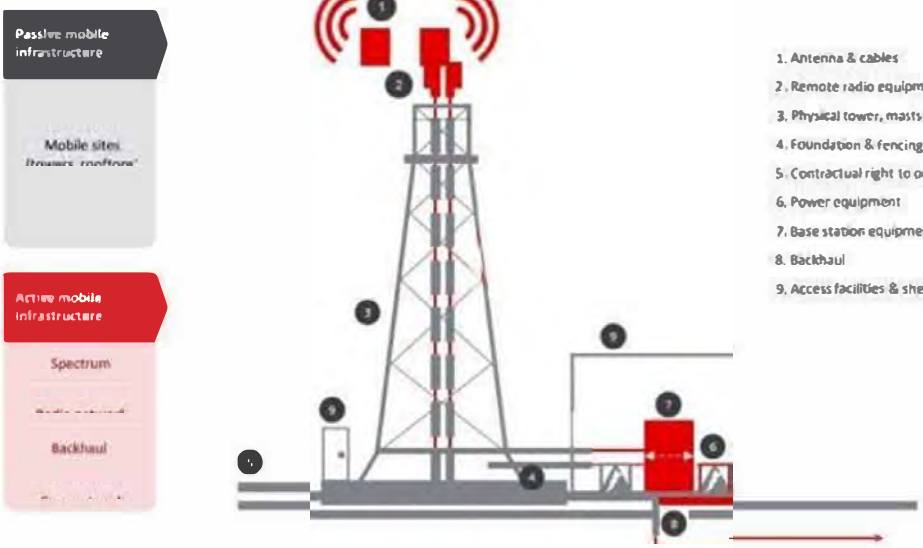
Spark / Connexa asset split on a typical macro tower

Standard configuration of a Macro tower



	Asset / Equipment	Ownership
1	Active radio-transmission equipment	Spark / third parties
2	Backhaul router	
3	Backhaul fibre	
4	Transmission masts and towers	Connexa
5	Fencing / gates	
6	Access facilities	
7	Huts (incl. rack space and cabinets)	
8	Rooftop walkways / ladders	
9	Fire suppression and security systems[2]	
10	DC power, back-up generators and batteries	
11	Airconditioning units	
12	Mobile only freehold sites	
13	Other passive equipment	

FortySouth



1	Antenna & cables	Active
2	Remote radio equipment	Active
3	Physical tower, masts & pole	Passive
4	Foundation & fencing	Passive
5	Contractual right to occupy site area	Passive
6	Power equipment	Active
7	Base station equipment	Active
8	Backhaul	Active
9	Access facilities & shelter/service rooms	Passive

Future Development Plan 2023 #8162

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

Refer to the attached submission prepared on behalf of Campana Land-Owners Consortium.

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

Refer to the attached submission prepared on behalf of Campana Land-Owners Consortium.

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

Refer to the attached submission prepared on behalf of Campana Land-Owners Consortium.

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

Refer to the attached submission prepared on behalf of Campana Land-Owners Consortium.

Other feedback

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

Refer to the attached submission prepared on behalf of Campana Land-Owners Consortium.

#8162

Saddleback
Strategy | Planning | Design

31 July 2023

Submission on

The Draft Future Development Strategy

On behalf of: Campana Land-Owners Consortium

Attention:	
Auckland Council	futuredevelopmentstrategy@aucklandcouncil.govt.nz

Introduction

This is a submission on the draft Future Development Strategy **(FDS)** on behalf of the Campana Land-Owners Consortium **(CLOC)**. The FDS was notified for submissions on 6 June 2023.

Auckland Council **(Council)** is required to prepare an FDS in accordance with subpart 4 of Part 3 of the National Policy Statement on Urban Development 2020 **(NPSUD)**.

CLOC is supportive of the response to growth within Auckland being led by an FDS prepared in accordance with the requirements of the NPSUD. However, CLOC has concerns with the draft FDS as set out in this submission.

This submission has three parts:

1. Commentary on the Strategic Spatial Framework of the FDS;
2. Commentary on timing of infrastructure outlined in the FDS; and
3. A request that the Future Urban Zoned land comprising Lot 3 DP 71211, Lot 2 DP 71211, Lot 1 DP 402013, Lot 2 DP 402013 and Allot 190 PSH OF Manurewa (Campana Road site) is identified for live-zoning (Business – Light Industrial) from 2025+.

Part 1: Sufficient Supply of Development-Ready Land: FDS Strategic Spatial Framework (Page 15)

Ensuring that there is sufficient development capacity for business and housing is a key purpose of an FDS under Clause 3.15.

Land supply is a central aspect of ensuring sufficient development capacity for industrial land, as it enables opportunities for high-value businesses to grow and employ more people. Economic development of the region may be constrained if the FDS is not prepared properly, with negative consequences for the New Zealand economy as a whole.

There are two primary areas of concern:

1. Existing Capacity

Section 1.2.4 (Page 6) details that the FDS builds on the previous iterations and replaces the 2018 Development Strategy yet no commentary or analysis about performance (theoretical verses actual land releases) against the development targets has been provided. Based on this, does Auckland have sufficient capacity for previously forecast growth currently?

It would be helpful if this section set out the number of homes and jobs that have been established within the Future Urban Zone **(FUZ)** since Future Urban Land Supply Strategy 2017 **(FULSS)** was adopted, and how that compared with the FULSS sequencing.

CLOC therefore disagrees with:

The statement within Principle 5(c) (page 23) that *"The future development strategy identifies there is sufficient residential and business development capacity across Tamaki Makaurau".* No justification has been provided to support this statement, and it is certainly at odds with market demand indicators for the industrial sector.

2. Development-Ready Land

The over-arching challenges (Section 2.3, page 12) clearly articulate that "*an uncertain and changing environment*" (Section 2.3.1), seeking to halt "*the ongoing degradation of the natural environment*" (Section 2.3.2) and financial constraints to infrastructure growth (Section 2.3.4) have materially impacted the supply of developable residential and commercial land – as evidenced by the proposal to remove some planned areas (see Figure 13, page 41) from 'Future Urban Area' allocation.

Such an indication raises serious questions over the assumptions underpinning growth modelling as to the rate at which areas indicated for future land uses can actually be converted to 'development-ready' land. Furthermore, other assumptions that underpin development capacity modelling needs to be reviewed include:

- The construction and finance industry's capacity to deliver projects of scale; and,

- Consenting ramifications in light of the principles (Section 2.5, page 15) being proposed to guide future development.

Therefore, in light of the restriction placed on land supply, CLOC agree with the statement in Section 2.3.4 (Investing in Infrastructure in a financially constrained environment) that: *"There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years."*

This being the case, Council should:

1. Be clear that the overarching objective is to maintain an adequate supply of developable commercial land; and,

2. Clarify that infrastructure investment is not necessary in some circumstances.

This submission therefore recommends that subheading in Section 2.3 "*Over-arching Challenges*" be amended as follows:

2.3.1: "~~Spatial planning~~ **Maintaining an adequate supply of development ready land in an uncertain and changing environment"**

2.3.4: "~~Investing in~~ **Provision of infrastructure in a financially constrained environment"**

We also seek that Section 2.4 "Spatial outcomes" includes an initial dot point: **"Tamaki Makaurau has an adequate supply of development ready land."**

Part 2: Timing of Infrastructure

CLOC agrees with the statement in Section S2.3.4 (Investing in Infrastructure in a financially constrained environment) that *"There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years."*

As detailed previously, Figure 13 identifies parts of the FUZ that have either been removed or are under investigation. This requires, as a minimum, some high-level commentary and explanation. For example, what proportion of the land that has been removed was allocated for housing, and what proportion was allocated for jobs?

Principle 5 (Enable sufficient capacity for growth in the right place at the right time – page 25) acknowledges that it is difficult to estimate where and when growth is likely to occur given the NPSUD requirement for Councils to be responsive to out-of-sequence development.

Other considerations raised are:

- Funding and financing pressures have increased (2.3.4, page 13).

- Smaller, distributed and nature-based infrastructure solutions (2.4.4, page 14) are largely untested and therefore challenging to get approved.

- A coordinated approach between agencies tasks with delivering the infrastructure is increasingly challenging (Principle 3, page 19).

This highlights the need for Council to be less rigid with sequencing. Council should also be open to plan change requests where business land is appropriate/necessary, and measures can be put in place to ensure the planned and available infrastructure is adequate.

This being the case, Council should be receptive to out-of-sequence development where additional infrastructure is not necessary, or there are solutions to infrastructure provision.

Part 3: Rationale for Including the Campana Road Site

During the Auckland Unitary Plan deliberations (finalised in 2016), a significant area of land west of SH20B and adjoining the Waokauri Creek was identified as the Puhunui Precinct and contained 6 sub-precincts. This included Sub-precincts A, B and D that have now been included within the Business-Light Industrial Zone. These existing industrial zoned areas are generally bound by Puhinui Creek to the south and Waokauri Creek to the north.

Approximately 70ha of land, identified as Sub-precinct-C, is now surrounded by Business – Light Industrial Zone but remains as Future Urban Zone (FUZ). While different to Council's closing remarks in the Auckland Unitary Plan Hearings process, that this land should be live zoned to Business – Light Industry Zone, Sub-precinct C was excluded from the Business – Light Industrial Zone because (primarily) Te Akitai Waiohua were concerned about uncertainties of effects on Pukaki Creek and Waokauri Creek and potential for future traffic infrastructure being required across Pukaki Creek.

While the panel considered that live zoning was *"seemingly inevitable"* and adverse effects matters can be appropriately managed through proposed control provisions, the s6(e) RMA matters suggested that a more cautious approach be taken due to Mana Whenua concerns. The Panel also noted that the extent of land live zoned to Business – Light Industry Zone in the overall precinct suggests that timing for this area to be developed is not so critical. The Panel therefore found that Sub-precinct C should not be live zoned but notated as Future Urban Zone so that these matters can be addressed specifically through a subsequent structure plan process[1].

Fast-forward seven years and there is now a significant shortage of developable commercial land, particularly commercial land close to residential central/south Auckland and Auckland Airport.

[1] See page 86-87 of the Report to Auckland Council, Hearing topics 016, 017 Changes to the Rural Urban Boundary; 080, 081 Rezoning and precincts, dated July 2016

FDS as it relates to FUZ within the Puhinui Precinct (Sub-precinct C)

Figure 13 (page 48) of the FDS identifies that the timing for the Puhinui FUZ is 2030+. This is supported by the *"Future Development Strategy – Future urban areas evidence report"* for Puhinui (pages 51-52).

The evidence report notes that transport infrastructure is not expected to be available to support development until 2030+, which appears to have fundamentally informed the proposed sequencing.

CLOC and the Campana Road site

CLOC's intention is to submit a private plan change request to rezone the Camapana Road site from FUZ to Business – Light Industrial. CLOC is comprised of five landowners who own approximately 25 ha of land within Sub-precinct C (the Campana Road site). Refer plan attached.

The CLOC parties include:

- Puhinui Industrial Estate Limited, within Allot 190 PSH OF Manurewa
- The Royal New Zealand Society for the Prevention of Cruelty to Animals Incorporated (SPCA), within Lot 2 DP 402013
- Perry, within Lot 1 DP 402013
- Anderson, within Lot 2 DP 71211; and
- Savannah Holdings Limited within Lot 3 DP 71211.

Farming activities within the site has significantly reduced or ceased more recently due to range of factors, including a lack of production infrastructure.

SPCA are also in the process of seeking resource consents to relocate their South Auckland (currently based in Manurewa) to the subject site. The design and consultation supporting this development commenced in 2021 and resource consent applications to allow construction were lodged in February this year.

The other owners of land within Sub-precinct C (Wiley and Wong) were invited to join the consortium but had either not replied or indicated that they had no immediate desire to live zone their land.

CLOC has commenced initial investigations to support site structure planning, along with consultation with Mana Whenua and Council policy staff. Further discussions with Mana Whenua, along with Auckland Transport, Waka Kotahi, Watercare and Auckland Airport will be undertaken soon, following completion of initial technical assessments.

Structure Plan-Led Development

The FDS is aiming to build an *"integrated strategic approach for resilient urban, future urban, rural and business environments, that protect and restore the natural environment and make best use of infrastructure and scare funding"* (Section 1.1, page 4)

Structure (or Framework) Plans are widely acknowledged as the best method to achieve this as they detail what needs to be achieved irrespective of underlying land ownership. The attributes and elements that would shape a Puhunui Precinct Structure Plan are:

1. The constraints imposed by operational requirements for AIAL, specifically:
    a. No-build areas in immediate proximity to the runway threshold; and,
    b. Building constraints under the direct flightpath.
    c. Ramifications of the second (parallel) runway planned to the north.
2. Restoring the natural environment:
    a. Imposing riparian margins to all watercourses (including Pukaki Creek, Waokouri Creek and Otaimako Creek) and their ephemeral tributaries.
    b. Low impact stormwater solutions requiring significant areas in and around these areas.
    c. Puhinui Crater and Puhinui Reserve to the south.
3. Make best use of infrastructure:
    a. Watercourse margins to accommodate off-road creational and pedestrian/cycle pathways (modal shift).
    b. The progressing Airport to Botany **(A2B)** multi-modal corridor along Puhinui Road - restricting road access points to preserve the efficacy of this key corridor.
4. Optimise outcome from limited funding:
    a. Leveraging existing roads and intersection points.
    b. Leveraging from (Auckland International Airport Limited **(AIAL)** investment (including Park and Ride facilities)
    c. Leveraging watercourse margins and associated pathway networks to reduce traffic demand.
    d. Limit the construction of expensive intersections, overpasses or bridges and focus to locations where optimal development can occur.

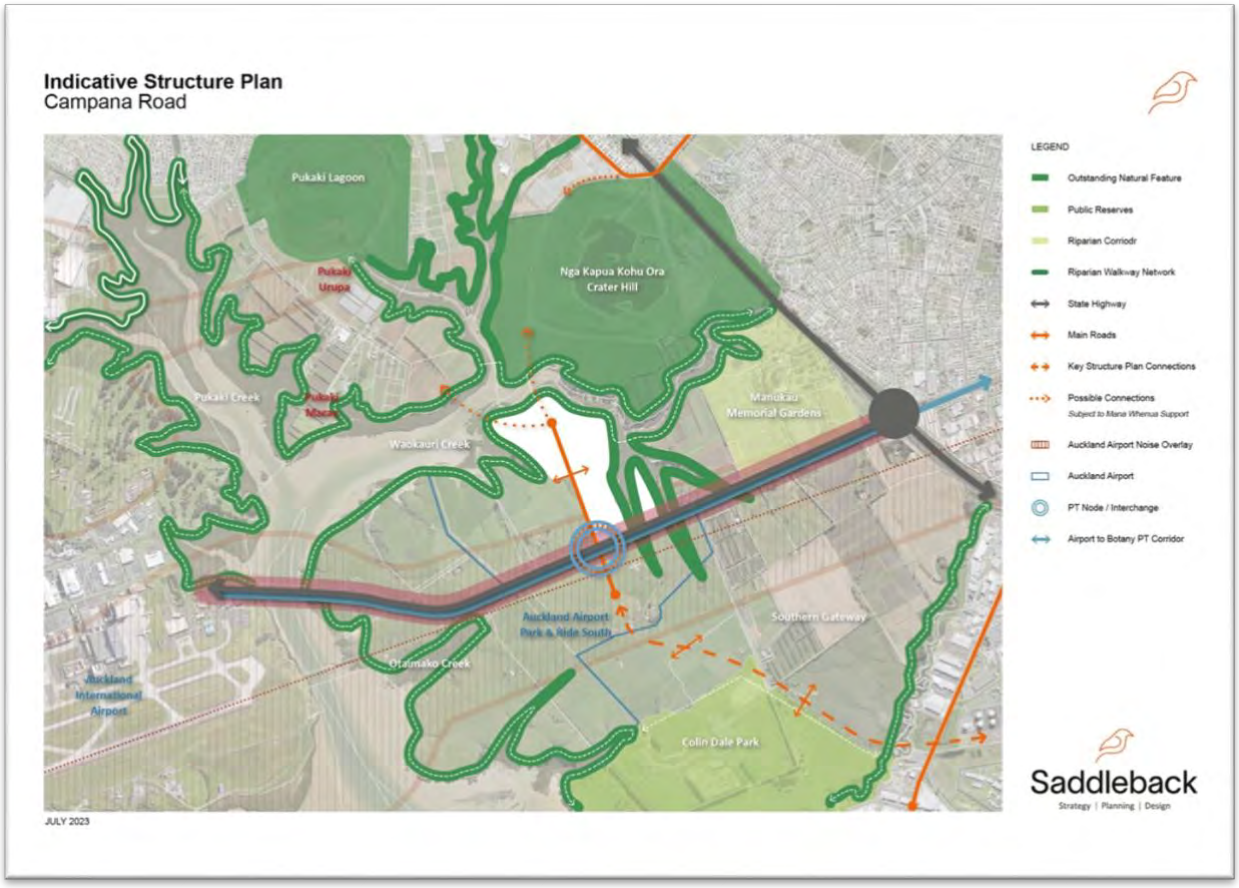
e. Create direct and legible linkages to these points to help provide alternate routes (network reliance).

5. Other considerations:

a. Iwi considerations (predominantly Te Akitai / Pukaki Marae) and aspirations.

b. Protection and celebration of the Pukaki Lagoon and Nga Kapua Kohu Ora (Crater Hill) as cultural and recreational amenities (subject to Mana Whenua support).

c. The desire to link Colin Dale sports park area into a wider creational network (established by item 2 above).



These attributes heavily impact the functional development area, and also start shaping how and where development would occur. Even without detailed testing it is clear that including the some of the *"un-zoned"* areas in Sub-precinct-C and including them as Business – Light Industrial Zone has limited additional impact, but provide benefits in terms of how the area can be developed, including:

- Helping shape linkages to the large recreational and cultural landscapes (subject to Mana Whenua support):
  - North to Pukaki Lagoon and Nga Kapua Kohu Ora (Crater Hill)

  - South to Colin Dale sports park Puhinui Crater and Puhinui Reserve

- Establishing a transit hub (low-level by virtue of flightpath constraints) along Puhinui Road
- Shaping a resilient roading network for Business – Light Industrial users away from Puhinui Road

These elements provide direct benefits to:

- Surrounding residents;
- Airport and local workers; and
- Businesses throughout the Puhinui Precinct.

Recommendations and Requests

It is requested that the Campana Road site within the Puhinui FUA is brought forward to 2025+ because:

1. Business – Light Industrial zoning of the area is generally consistent with the intent of the Unitary Plan hearing recommendations.

2. There is now a significant demand for commercial land in the area and due to the central location will result in reduced vehicle emissions compared to other commercial land that is further from housing.

3. The land within the Campana Road site is generally unproductive and the underlying rural zone is not appropriate.

4. Initial design work has commenced. It is intended that and structure planning will be completed in partnership with Mana Whenua.

5. The initial development requested would be limited to the SPCA activity and low traffic-generating storage use, controlled by new precinct conditions. Full development would be limited to these activities until planned transport infrastructure is available.

6. The NOR to complete the Airport to Botany Rapid Transit has been lodged and maybe approved this year. It is possible that the necessary transport infrastructure to allow full development of the site prior to 2030.

This submission therefore recommends that Figure 13 of the FDS is updated to show the Proposed new timing of the Campana Road site as 2025+, rather than 2030+.

Kind regards,

[redacted]
Joe Gray

Principal Urban Planner
Saddleback Planning Limited

[redacted]
Bruce Weir

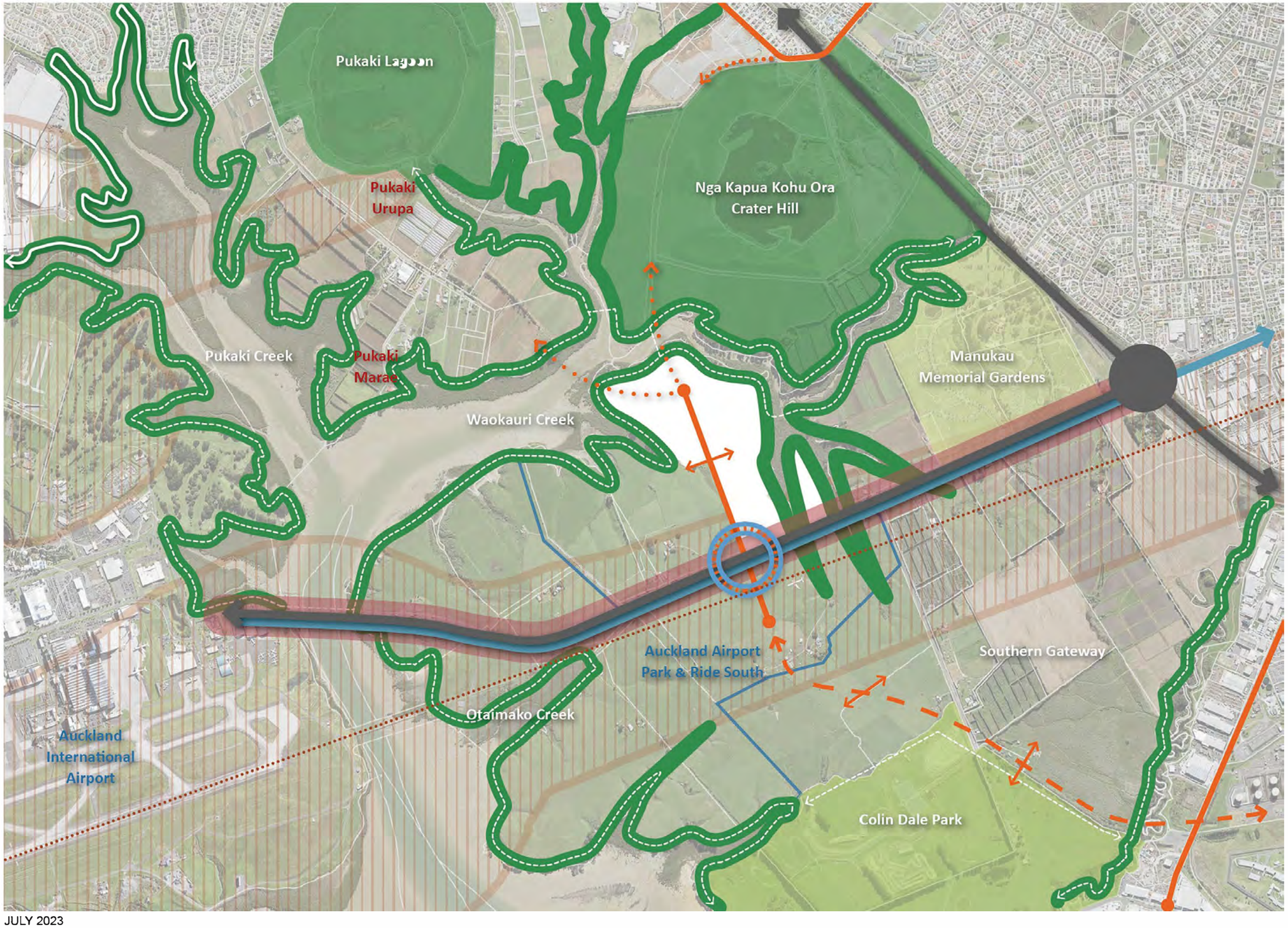
Principal Urban Designer
Saddleback Planning Limited

Appendix 1:

Indicative Structure Plan (CLOC)

#8162

Indicative Structure Plan
Campana Road



LEGEND

- Outstanding Natural Feature
- Public Reserves
- Riparian Corriodr
- Riparian Walkway Network
- State Highway
- Main Roads
- Key Structure Plan Connections
- Possible Connections
  Subject to Mana Whenua Support
- Auckland Airport Noise Overlay
- Auckland Airport
- PT Node / Interchange
- Airport to Botany PT Corridor

Saddleback
Strategy | Planning | Design

JULY 2023

Future Development Plan 2023 #8174

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Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

#8174

Auckland Council Planning, Environment and Parks Committee

David Kidd – Chief Executive Officer
Euan Williams – Principal Planner
Woods

W-REF: P23-242
31 July 2023

Submission

Consultation Draft – Auckland Future Development Strategy 2023-2053

SUMMARY

1. For over 50 years, Woods has been involved in land development and residential projects in the Auckland region, and relies on robust and well considered planning provisions to enable the range of projects we are involved in. As such Auckland Council's response to the National Policy Statement on Urban Development (NPS:UD) is of critical importance to us, and we welcome the opportunity to comment on the Auckland Future Development Strategy 2023-2053 (Consultation Draft) ("Draft FDS").

2. Managing Auckland's growth has become even more acute recently with a national and regional focus on urban development and residential intensification. Woods maintains the proposed planning framework for urban development does not properly account for the benefits of greenfield development and will significantly impact Auckland's growth by:

    a) delaying the progressive re-zoning of future urban zoned land and promoting an imbalanced ratio of brownfields versus greenfields developments;

    b) removing consideration of housing supply, costs and choice from Aucklanders; and

    c) not adequately considering the benefits of greenfields developments.

3. We address these matters in response to the specific issues raised by the submission below.

WHO WE ARE

4. Woods was established in 1970 and we offer a full suite of Urban Design and Architecture, Engineering, Planning, Surveying and Geo-Spatial services to the land development, building, health, institutional, energy, government and transport sectors. We have the experience and skills to deliver a complete project with end-to-end support and our primary focus is on land and infrastructure.

5. Our successful greenfield projects include Flat Bush, Stonefields, Long Bay, Millwater, Milldale and Paerata Rise. These are large scale developer-led projects with exemplary outcomes that can only be achieved at scale. The key to successful delivery of these projects is to masterplan the land upfront to make sure that the infrastructure servicing and amenities are sufficient to meet the future needs of the community, while addressing the risks from natural hazards and maintaining valuable natural futures.

6. Woods are also involved in the Piritahi Alliance that prepares land for development and delivers new and upgraded infrastructure and amenities on behalf of Kāinga Ora - Homes and Communities. The Alliance works within Kāinga Ora's large-scale urban development areas where state-owned land is being better utilised for new homes. We also design and construct new or upgraded infrastructure, parks and public spaces.

ISSUES

Housing supply

7. In 2018, Auckland Council identified a demand of 189,800 dwellings in medium term (1-10 years), and a demand of 408,300 dwellings in long term (1-30 years). In the last five years, 80% of new dwellings have been consented in urban areas, and we believe this is a good balance between urban and rural areas that enables Auckland to meet the demands of new dwellings.[1]

8. However, it is expected there will be a shortfall of approximately 82,000 dwellings in the long term. The Draft FDS indicates that Kāinga Ora, KiwiBuild, and Eke Panuku will work to address the long-term shortfall. By reducing greenfields developments in the long term, the housing shortfall will impact future generations. Of note, the Draft FDS indicates that over the next 30 years, 773,000 dwellings are needed to provide sufficient development capacity (Appendix 4 of the Draft FDS), which are significantly higher than the predicted demand being 408,300 dwellings in 2018.

9. The Draft FDS aims to achieve societal and environmental well-being for all Aucklanders. However, the Draft FDS fails to provide flexibility over housing options for future Aucklanders. The current strategy encourages more people to live in existing urban areas, although fails to acknowledge that not all people prefer to live in urban living environments. The Draft FDS, as currently drafted, removes choice for those Aucklanders who would prefer to live in the greenfield areas of the city and enjoy the benefits that come with that choice.

Cost of infrastructure

10. Though brownfield subdivision may benefit from existing electricity, water and access to public roads, there are significant restrictions in existing urban areas that would increase the cost of construction and infrastructure upgrading. There are also limitations associated with flooding and natural hazards and areas with serious limitations on growth due to infrastructure capacity.

11. In our opinion, the cost and complexity of infrastructure development associated with brownfield development have not been fully acknowledged or recognised by Auckland Council in the Draft FDS. In our experience, the costs associated with large scale brownfield redevelopment can be significantly higher than the cost of greenfield development. This can be in the order of up to three times as expensive per hectare excluding land costs. This is due to the need to upgrade existing infrastructure which hasn't anticipated densification and is often in a poor state, and the associated disruption to existing communities.

Complexity

12. In addition to the above commentary on infrastructure costs, it is important to note the scale of Auckland urban properties that are subject to natural hazards, including flood plains, overland flow paths, coastal inundation, and coastal retreat. This year the Auckland region has experienced the tremendous impact of flooding events. Further to these restrictions, there are also a large number of urban streams, rivers and wetlands that need to be protected, all of which will limit the amount of land available for urban development.

13. It is further noted that there is no clear strategy in the Draft FDS for stormwater improvements as part of Auckland's essential bulk services and no recognition of how difficult it is to undertake brownfield developments at scale due to the lack of infrastructure servicing support.[2] The Draft FDS signals that spatial growth is largely aligned with Kāinga Ora redevelopment areas. However, the key question is, without central government funding, how will the remaining areas in Auckland be intensified and supported by fully funded infrastructure upgrades.

14. Another key challenge for the council is that along the intensification of urban areas, whether there are more spaces to allow more community facilities, such as schools, parks, libraries, sports centres, clinics and early childhood education. Particularly, for public facilities like parks, neither council nor developers would be able to fund new parks in urban areas due to the cost and availability of land.

15. In contrast, a quality master planned greenfield development will enable the provision of appropriate community facilities to suit the needs of future residents. Typically, neighbourhood

[1] https //www aucklandcouncil govt nz/plans-projects-policies-reports-bylaws/our-plans-strategies/auckland-plan/development-strategy/Pages/assessing-demand aspx

[2] https //www aucklandcouncil govt nz/plans-projects-policies-reports-bylaws/our-plans-strategies/auckland-plan/development-strategy/Pages/aucklands-infrastructure aspx

reserves are planned ahead and spatially distributed according to walking distances, schools are planned for and designated, riparian areas are designed to promote both ecological and recreational outcomes.

Timeframes to deliver housing at scale

16. A significant benefit of greenfield over brownfield development is that it can be delivered at scale and at pace. There are a number of factors that prolong the development programme (and cost) within the brownfield context including longer consenting timeframes, complexities with working around existing privately owned housing, traffic control, and poorly maintained underground and overhead infrastructure and utilities. Furthermore, community consultation and engagement with service providers often extends the timeframe of consenting and construction for infrastructure related upgrading projects.

17. Ultimately, brownfields development takes longer to deliver and costs more, and this has a direct impact on housing affordability. In our experience, greenfield developments have the potential to be developed in a more certain timeframe at a more certain cost with this being shorter and significantly cheaper than an equivalent brownfields development.

Benefits of greenfield development

18. As outlined above, the disproportionate focus on brownfields developments will increase the construction costs and the development timeframe to ensure sustainable housing supply. Auckland Council needs to acknowledge the benefits of greenfields developments, including:

    a) providing Aucklanders with housing options and a range of affordability to meet anticipated growth;

    b) contributing to Auckland's GDP and efficient investment and delivering of planned infrastructure;

    c) providing Aucklanders with housing in developments that are well designed and master planned, walkable, accessible to retail and commercial, and include all necessary social infrastructure such as schools and parks; and

    d) effective management of natural hazards including flood mitigation.

Consultation process

19. Clause 3.15 of the NPS:UD requires that, in order to prepare the Draft FDS, the local authority must engage with the development sector to identify significant future development opportunities and infrastructure requirements. However, it is evident the council has failed to engage with the development sector to prepare the Draft FDS. Our land development clients, including Fulton Hogan Land Development Limited, Grafton Downs Limited, Parklands Properties Limited, and Fletcher Residential have not been approached by Council with respect to aligning the intent of the market with areas where growth is enabled and anticipated. Therefore, the Draft FDS has not followed the proper consultation process as required under the NPS:UD and the Local Government Act in preparing the Draft FDS.

20. Due to the absence of thorough consultation with the development community, council has appeared to devalue the contribution these parties make to Auckland and associated economic growth. The Draft FDS will have a number of unintended consequences on Auckland's urban growth, housing choice and affordability, and GDP.

CONCLUSION

21. Based on the above, Woods has concerns on the strategy set for greenfields in the Draft FDS and therefore seeks the following actions from Auckland Council:

    a) that Auckland Council extend the consultation period and make sure that the community and infrastructure developer engagement has gone through a proper and legal process;

    b) that Auckland Council, in consultation with the development community, develop a more robust process to ensure greenfield developments is available in the Auckland region for the next 30 years. That way the FDS will align with current demand for greenfield and brownfield developments and will meet housing supply requirements; and

c) that Auckland Council re-evaluate the costs for the greenfields developments and brownfields redevelopments, and to set a balanced approach to support Auckland's growth.

Date: 31 July 2023

Address for Service: David Kidd

PO Box 6752

Victoria St West

Auckland 1142

Telephone: [redacted]

[redacted] [redacted]

Future Development Plan 2023 #8183

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Your feedback

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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

The water quality in Auckland harbour due to very old inadequate separation of stormwater from sewage means more intensification will make the situation much worse

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

Cramming more people in close proximity to downtown Auckland overloads the infrastructure which can't cope with the present numbers

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 must define these high risk areas now.

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

Auckland city is largely sitting on Waitemata sediments which become unstable when groundwater dissolves the carbonate cements that holds the cements together. Remove this cement and the swelling clays expand and contract causing instability. A detailed study of this phenomena is sadly lacking right now.

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 #8188

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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

Please refer to attached document

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Agree

Tell us why

Please refer to attached 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 attached document

#8188

Te Kāhui Whaihanga
Auckland Branch

This is a submission on the Auckland Future Development Strategy 2023-2053 Draft on behalf of the Auckland Branch Committee of Te Kāhui Whaihanga New Zealand Institute of Architects and reflects the views of the Committee.

Quality compact growth in existing urban areas in Tāmaki Makaurau is critical to ensuring a well-functioning urban environment for future generations to live, work, play and visit this city.

We support the general aims of the strategy and have the following comments.

To achieve the desired spatial outcomes identified in the Future Development Strategy Strategic Spatial Framework, a rigorous process of public engagement and consultation with all stakeholders needs to occur. To enable the transformation outlined in the dynamic and changing environment we live in, an implementation plan and ongoing review process will also be required.

- **Blue/green spatial network:**

Comprehensive plans for Future Urban Zones (prior to zoning) and intensive growth areas are required to manage the combined needs of ecology, hydrology, infrastructure, economics, community and urban growth across the city and ensure climate resilience and the health and wellbeing of the community through greater understanding and management of our Taonga, natural systems including natural hazards.

- **Integrated spatial planning at a local level:**

Undertake local neighbourhood master plans which are place-specific and involve the community as integral stakeholders within this process to provide developers, residents and business owners certainty as to where growth is expected and when it is to occur based on investment and rollout of infrastructure. This master planning process must identify how the desired outcomes will address place-specific community needs of housing, services, education, employment, transportation etc in a manner which is specific to the people, place and immediate context of each local area.

- **Growth to be predominantly in existing areas:**

Quality compact growth to be contained within the existing urban extents of Tāmaki Makaurau

We support the concept of quality compact form, but stress that there must be mechanisms in place to both define what is meant by ‘quality’ and how it will be implemented. It is critical that Auckland Council clearly outline the assessment criteria and measurement processes to ensure high quality outcomes are achieved and adhered to across all scales of future urban development, including but not exclusive to housing, mixed use developments, built form, transport outcomes, public realm and integration of community amenity and recreational spaces.

Limiting private plan changes for land holdings which do not support the principles of a well-functioning urban environment.

- **Equitable Distribution of Future Development and Outcomes:**

Provisions for more equitable distribution of housing and housing choice with consideration of affordability, a community's access to employment, transportation options, goods, services, recreational and cultural resources, in particular, access to community facilities and green space and ways that allow people to live and work locally while providing resilience to climate change.

- **A well-functioning mass transport system which is integrated and aligned with localised neighbourhood spatial / master planning:**

Particular focus and care are required around zones identified as key rapid transit corridors as these are areas where greater density in the future built form is encouraged to occur. Integration of development outcomes are critical to the success and utilisation of this key rapid transport infrastructure.

- **Resilient Infrastructure Development**

Develop resilient infrastructure which addresses the ongoing impacts of climate change.

Align infrastructure development with spatial planning and address funding mechanisms to provide certainty around infrastructure timing and outcomes with a confirmed and funded pipeline of infrastructure work to provide confidence in developments and stimulation of both public and private investment. The formation of an independent urban development authority should be investigated with a mandate to lead and invest in transformational projects.

The Infrastructure Commission needs to be given the mandate to prioritise the infrastructure pipeline independently of political cycles to ensure that Tāmaki Makaurau gets the supporting resilient infrastructure it needs to grow and develop sustainably. This would avoid policy swings which occur with government changes that cause uncertainty in the construction industry, diminishing productivity and hampering sustainable growth.

- **A City Architect:**

We support/encourage the introduction of a City Architect with the remit and strategic guidance oversight to ensure that the quality outcomes encouraged by the Future Urban Development Strategy are delivered successfully. A city architect would contribute to the long-term vision, functionality and character of Tāmaki Makaurau ensuring that growth and development can occur in a harmonious and sustainable manner. We see this role similar to the State Architect Role established in Australia which enables and ensures processes are in place to educate and promote quality outcomes in the built environment commissioning research, proposals and sponsoring placemaking design competitions where the public good would benefit from such initiatives encompassing public space planning, preservation and conservation, design review and urban planning.

31 July 2023

Auckland Branch Committee
Te Kāhui Whaihanga New Zealand Institute of
auckland@nzia.co.nz

Future Development Plan 2023 #8200

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Your feedback

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Other

Tell us why

see attached feedback from KiwiRail Holdings Limited

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Tell us why
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Other

Tell us why
see attached feedback from KiwiRail Holdings Limited

Other feedback

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

see attached feedback from KiwiRail Holdings Limited

31/07/2023

Auckland City Council
Private Bag 92300
Victoria Street West
Auckland 1142
Attn: Plans and Places

Dear Sir/Madam

KiwiRail Holdings Limited comments on draft Future Development Strategy 2023-2053

KiwiRail generally supports the draft Future Development Strategy 2023-2053 (Strategy) direction, as it is aligned to several of KiwiRail's key strategic planning objectives. Our feedback on the Strategy provides background about the need to plan for rail freight capacity changes and the interrelationship of passenger and freight movements in Auckland - coupled with specific comments on selected parts of the draft Strategy.

a. Background

KiwiRail Holdings Limited (KiwiRail) is the State-Owned Enterprise responsible for the management and operation of the national railway network. This includes managing railway infrastructure and land, as well as rail freight and passenger services throughout New Zealand.

At its core, the Auckland rail network is a mixed-use railway where passenger (metro and inter-regional) and freight services operate on the same tracks and must be timetabled to allow fair, reasonable, and safe access for all users. Investment in the rail network is required for all markets.

KiwiRail's operations in Auckland comprise 22 million passenger journeys annually and the movement of six million tonnes of freight each year. Both services will grow with the City Rail Link opening. KiwiRail is also carrying out more than $1.5 billion in new rail projects to improve the resilience of underlying track infrastructure as it prepares the Auckland network for future growth. These Decade One projects underway include:

a) the Rail Network Rebuild to replace the foundations under the tracks for more reliable service and to bring the network up to a modern, more resilient metro standard;

b) building a Third Main Line alongside the two existing tracks between Westfield and Wiri Junction to ease congestion and reduce delays on the busiest part of Auckland's rail network;

c) extending the electrified network south to Pukekohe to allow for the expected population growth in the southern part of Auckland; and

d) building three new train stations at Drury, Ngākōroa and Paerātā to be completed as early as 2025. These funded station projects will provide access to public transport (PT) rail capacity to wider Drury, but it is noted that some parts of the intended catchments have been delayed due to hazard constraints.

By undertaking these projects, KiwiRail is building a rail network that can support more frequent passenger services, with faster journey times, and manage the inherent challenges of operating services which move both people and goods on limited rail track infrastructure.

KiwiRail is expecting train volumes and frequencies to increase across the entire Auckland network, in alignment with the growth and increasing focus on public transport connections for the region and its development. KiwiRail is also conscious that Auckland is not an island. Choices made about rail capacity in Auckland can have fundamental implications for the rest of the country if not properly thought through. KiwiRail’s view is that it is important that planning in Auckland should support both regional and national objectives.

Auckland's rail system plays a critical role in achieving the broader aims of a connected transport network for all Aucklanders and is fundamental in enabling the necessary mode shift from vehicles operating, to from and within Auckland to support New Zealand's commitment to reducing emissions. Together with Auckland Transport (AT) and Waka Kotahi, KiwiRail is actively planning the rail infrastructure network requirements for the next 30 years as New Zealand moves towards net zero carbon by 2050.

Modal shift to more climate-friendly modes of transport, like rail, is critical to reduce carbon emissions. As a result, rail is experiencing a renaissance as evidenced by the recent significant investment made by the Government in the railway network, noted previously, demonstrating a strong and continued confidence in the current and future potential of rail.

b. 2.4.3 Development achieves quality living environments

An integrated and proactive approach to rail planning is critical to support the overall vision of Auckland, and to ensure that Auckland's transport network can support the increasing growth and housing intensification. Intensified housing will not be able to function as intended if this essential rail infrastructure is not enabled, protected, and provided for in a safe and timely way (both now and into the future).

It is important that intensification is enabled while providing for the effects it can generate, including reverse sensitivity effects arising from the increased density and numbers of sensitive activities next to existing, noise-generating infrastructure like the rail corridor. KiwiRail considers this could be enabled through the promotion of well-functioning urban environments.

A critical part of ensuring the safe and efficient operation of the railway network over the medium and long-term is managing development and intensification of sites adjoining the rail corridor. In KiwiRail's experience, this manifests in two ways:

a) physical interference with the rail corridor which can occur from buildings and other activities locating too close to the rail corridor and its activities; and

b) reverse sensitivity and health and amenity effects arising from increased numbers of sensitive activities (particularly dwellings) locating with areas subject to noise and vibration from the rail corridor.

The greater the intensity of housing and other development adjacent to the rail corridor, the greater the risk of these impacts occurring.

c) 2.5 Principles for growth and change

With AT, KiwiRail is currently considering future heavy rail and passenger services needs over the next 30 years, with rail’s objectives similar to several Strategy Principles,

- resilient in a range of scenarios, with sufficient capacity and resources to maintain, renew infrastructure and meet demand from heavy rail passenger and freight customers efficiently and effectively
- moving towards segregated fit for purpose passenger and freight infrastructure – to better match performance requirements and grow resilience
- assists in cutting Auckland and New Zealand’s transport carbon emissions by driving material mode shift from low occupancy vehicles to the Auckland rail network
- sufficient capacity and frequency timely, easy to access, safe, reliable, affordable, and integrated with the public transport and national logistics systems.

Of note is the sub option 3(b): *Make the best use of existing Infrastructure* in Principle 3. The existing KiwiRail network is the result of considerable investment and planning over the last 100 years. KiwiRail welcomes recognition that much of the infrastructure that will support Tāmaki Makaurau over the longer term already exists. This necessitates ongoing planning support for railway corridors and operations. It is noted however, that expanding existing routes and networks will become challenging, as infrastructure competes for the same routes or spaces as other forms of development or other infrastructure providers. This may create constraints on all infrastructure providers unless each party's strategic plans are well integrated, and projects are physically well aligned.

d) Appendix 3: Infrastructure to support development capacity

KiwiRail is keen to work collaboratively with the Council to integrate rail freight requirements in the Strategy. KiwiRail's original network was built to move goods to and from the ports. COVID-19 has exemplified the fragility of global and national supply chains and is a reminder that planning must also contemplate the "unseen" – such as how the transport system in Auckland will support the movement of goods to/ from the ports and through the country. As Auckland has the largest consumer population and is the centre for several logistic firms, it will always have a requirement for inbound heavy freight haulage.

Strategic plans suggest that the growth on the North Island Main Trunk line, though to southern centres will continue. This is a strategically critical corridor. Decisions around the future of Port Auckland will also have material implications for freight flows. To provide resilience across a range of future scenarios, for example, KiwiRail considers the designated but undeveloped Avondale to Southdown rail corridor could play in taking freight flows from the congested inner rail and road networks.

There is a present and future need to efficiently transport freight within and out of the Auckland region. Access to right-timed and reliable freight capacity in Auckland is a present-day constraint that will worsen as demands on the network (from both freight, regional and metro) increase. This would increase the risk that Auckland will become a bottleneck on the national supply chain. Rail freight planning must also anticipate potential material shifts in port strategy, or rail will be prevented from playing its full part in the New Zealand supply chain and its decarbonisation.

It is noted that interregional rail PT services are not identified in **Appendix 3.** Although the area within Auckland's boundaries is the focus here, the performance of its transport system can be affected by users beyond Auckland's bounds.

It is noted that there are no rail capacity related projects listed in **Appendix 3** beyond Decade One, but these will be needed, unless there is evidence that this growth in demand

into Auckland from beyond Auckland's boundaries can be absorbed by the roading system efficiently. In our view, it is important the strategy recognises the potential for rail to reduce the region's dependence on interregional flows by road.

In addition to ensuring sufficient track capacity, there will be a concomitant need for additional stabling, servicing, and freight hub facilities – all of which are long term strategic planning projects which can have an influence on future development patterns.

e) Appendix 12: Implementation actions

Appendix 12 details the range of matters required in the Auckland Unitary Plan Operative (in part) (AUP OP) to embed the draft strategy. KiwiRail is keen to see its rail routes maintained and strategic routes safeguarded, as future spatial and natural built environment plans enable growth along them. Part of that will be ensuring that railway operations are not unduly constrained and that the health and safety of new residential communities is not compromised where this occurs adjacent to railway corridors.

A supportive AUP OP (and its future replacement) planning policy framework, which continues to recognize the significance of rail to the region is required, along with measures to safeguard the network and protect the existing investment with appropriate development controls. Integrating incoming development with railway corridors is essential to ensure that amenity, safety, and accessible transport (i.e., part of quality living environments) can coexist with resilient regional freight and passenger services.

Given the current dynamism in the planning space, KiwiRail would like to see mention on the list of matters to be addressed in the plan being the continuance, in the coming years, of retaining the existing AUP OP policies, that are supportive of infrastructure, and any replacements to be directed at;

(a) Protecting and maintaining existing and future rail corridors to ensure that resilience and adaptation is maximised

(b) Supporting increasing the use and improved safety of the rail network for both freight and urban passenger transport; and

Rules in (current and future) plans to manage new development design to;

- ensure that the present and future rail corridors can be operated safely and efficiently, including by managing adjacent activities that may compromise safety or efficiency and that adequate provision is made to mitigate such effects.

If you require any further information or wish to discuss any of the comments made, please contact Pam Butler Senior Resource Management Act Advisor, in the first instance Pam.butler@kiwirail.co.nz

KiwiRail would welcome the opportunity to discuss its comments in more detail with the strategy and policy teams.

Regards,



Gwyneth MacLeod
Head of Network Strategy and Investment
KiwiRail Holdings Limited

Future Development Plan 2023 #8211

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Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please find the full submission attached.

Waitematā Harbour Connections

WAITEMATĀ HARBOUR CONNECTIONS

28 July 2023

Attn: Dawne Mackay, Elise Webster and Katrina Hunt
Plans Strategy and Research Team
Auckland Council
92300 Victoria Street West
Auckland 1010

cc. Brian Waddell, Waka Kotahi NZTA

Dear Dawne, Elise and Katrina,

Subject: Auckland Council Future Development Strategy – Feedback

The purpose of this letter is to outline the Waitematā Harbour Connections project team's initial feedback on the Auckland Council draft Future Development Strategy. We acknowledge that this will be an iterative process working with our partners to achieve joint outcomes for Tāmaki Makaurau.

The feedback provided has been restricted to a few key points related to the WHC project, rather than the FDS document as a whole.

Executive Summary

The Waitematā Harbour Connections ('WHC' or 'the Project') will provide new multi-modal transport connections across the Waitematā Harbour to Auckland's North Shore and is expected to shape future growth.

Auckland Council is currently consulting on the Future Development Strategy ('FDS'), which is a long-term strategic planning document that sets the high-level vision for accommodating future urban growth and identifies key strategic priorities.

The WHC team has provided feedback to Auckland Council on the FDS, with a focus on how it relates to the rapid transit and land use aspects of the Project.

The following relief is sought in relation to these matters:

- Include Takapuna – Smales Farm as a node
- Provide greater detail on intended growth areas for the North Shore
- Include Albany as a Year 11 – 30 Spatial Priority Area
- Provide greater detail about the intended growth outcomes for the nodes, particularly Albany
- Place greater emphasis on accommodating growth along existing and future rapid transit corridors and strengthen the wording of Principles 3 and 5

- Update the description of the WHC project as provided in Section 4.2.5 and Appendix 9, in light of its current status and linkage with the wider rapid transit network, in collaboration with the project team.

Overall, we would encourage Auckland Council to work closely together with the WHC to achieve alignment on the outcomes sought by the FDS.

Context

The WHC Project is a significant city shaping project which will play a fundamental role in guiding the development of growth on Auckland's North Shore. The project will provide new multi-modal connections for people wanting to walk, cycle, take the bus, travel by light rail, drive, or transport freight across the Waitematā Harbour. It will connect people to transport options across the region and beyond and shape future growth on the North Shore. WHC is being developed in partnership with Ngā Iwi Mana Whenua o Tāmaki Makaurau, Auckland Transport and Auckland Council.

The FDS is a key guiding document that sets out the Auckland Council plan to manage growth across Tāmaki Makaurau for the next 30 years, both within the city and in greenfields locations. It seeks to integrate long-term land use and infrastructure planning while meeting future environmental, population, housing and employment needs. The FDS replaces the existing Auckland Plan 2050, Development Strategy 2018 and the Future Urban Land Supply Strategy 2017.

Feedback

<u>High Level Summary</u>

The WHC Project initial feedback relates to the following key matters which are elaborated on in latter sections:

- The role of Takapuna
- Centres hierarchy
- Long term growth priorities
- Growth outcomes for nodes and 'Spatial Priority Areas'
- The role of the rapid transit network in shaping growth
- Appendix 9
- Working together

<u>Specific Matters</u>

- The Role of Takapuna

  Takapuna is identified as a key node for residential development and employment growth for the WHC project as this is supported by the existing Metropolitan Centre zoning in the Auckland Unitary Plan.

  Takapuna's proximity to the growing Smales Farm employment area and North Shore Hospital creates a linear corridor along Taharoto Road where high-density growth can be concentrated and be supported by significant transport investment. Opportunities also exist along the Barrys Point Road corridor, which is underlain by the current permissive Mixed-Use zoning and is suitable for redevelopment for both residential and commercial uses.

  As such, the project team believe that there is a strong case for the Takapuna-Smales Farm area to be included in the FDS as a node within the multi-nodal model and within

Appendix 5. A potential node extent is shown below in red; the area shown is indicative only and seeks to include the core Takapuna and Smales Farm business areas, along with the Barrys Point and Taharoto Road corridors. This area also includes key trip generators such as the Auckland University of Technology North Shore Campus, North Shore Hospital and Akoranga Business Park, along with potential development sites such as 48 Esmonde Road. A setback is provided from the edge of Lake Pupuke and Takapuna Beach.



Relief Sought:

- **Include Takapuna – Smales Farm (including the Taharoto Road corridor) as a node as indicated in the illustration above.**

➢ Centres hierarchy

The information supporting the planned spatial priority growth areas is high level and does not delve into where growth will be prioritised beyond the selected nodes and spatial priority areas. While large scale growth may be expected in these areas, significant growth is still provided for in a number of other areas throughout Auckland through the Auckland Unitary Plan. The FDS does not provide a 'hierarchy of centres' for where growth is expected or should be prioritised outside of the identified areas.

The FDS also does not provide an overall spatial plan for Auckland, unlike previous versions of the Auckland Plan. While Figure 18 ('Spatial Priority Areas') identified the key spatial priority areas, more detail is needed on secondary growth areas.

Relief Sought:

- **Include a 'hierarchy of centres' for development area priorities.**
- **Provide an overall spatial plan for Auckland, including secondary growth areas.**

- Long Term Growth Priorities

  The WHC Project is identified within the draft FDS as a key project to unlock growth in the longer term (Page 52), however the FDS is largely silent on where growth should be accommodated as part of this project due to unknowns about the alignment. More direction is needed in the FDS on where growth should be prioritised on the North Shore, as the Indicative Business Case ('IBC') assessment for WHC relies in part on aligning the Project with Auckland Council growth strategies and seeks to realise the intent of those strategies. While the WHC business case process is progressing, the decisions made to date on the Project should be reflected in the FDS. We note that there are no spatial priority areas identified on the North Shore. The project team advocate for Albany to become a long-term spatial priority area to clearly identify expected growth in this area, and to signal the investment required to support the growth that will occur within this area in the 11 – 30 years timeframe.

  The potential for the WHC project to shape long term development priorities is mentioned on Page 52 (Section 4.2.5), which the project team supports, however more emphasis should be placed on the ability for the new rapid transit project to shape growth beyond the motorway. This section should also be updated to reflect the progress to the WHC project.

  Relief Sought:

  - **Provide greater detail on intended growth areas for the North Shore, including incorporating the decisions made to date on the WHC project.**
  - **Include Albany as a Year 11 – 30 Spatial Priority Area.**
  - **Update the description of the WHC project in Section 4.2.5.**

- Growth Outcomes for Nodes and Spatial Priority Areas

  Some information is provided on the Nodes in Appendix 5 ('Information on the nodes'), however this quite high level. Further detail should be provided on the outcomes sought for the key growth areas, including the mix of uses, types of employment sought, scale of development envisaged, and the level of growth sought and what investment is required to support the growth. The decisions made on the WHC Project and the assessment to support these decisions will also inform this, particularly at Albany and Takapuna (should this be included as a node). The project team encourage a collaborative approach to work together and agree suitable outcomes for these areas.

  Relief Sought:

  - **Provide greater detail about the intended growth outcomes for the nodes, particularly Albany. This can be informed by the work undertaken to date by the WHC team on the short list and emerging preferred options.**

- The Role of the Rapid Transit Network in Shaping Growth

  The project team consider that more emphasis on the importance of rapid transit in shaping better urban development and employment outcomes is required in the FDS. Future growth should be concentrated on both the future WHC corridor and the existing Northern Busway corridor, which can accommodate significantly more growth in areas such as Albany and Smales Farm (particularly in light of Plan Change 23).

  This change could be incorporated by providing more specific direction in the 'Principles for growth and change', specifically Principles 3 and 5, which state:

- *Principle 3: Make efficient and equitable infrastructure investments*
- *Principle 5: Enable sufficient capacity for growth in the right place and at the right time.*

The project team supports the intent of these principles, however they could be strengthened by placing more emphasis on investing in infrastructure to support growth along the existing and future rapid transit network. This would align with the intent to enable growth in the right place and to make efficient investment decisions.

Finally, Section 4.2.1 Point 3 discusses the potential for major projects such as WHC to contribute to long-term development patterns and states *"There are major projects being planned, such as Auckland Light Rail, the Waitematā Harbour Connections and North-west rapid transit, that potentially offer significant long-term benefits for Tāmaki Makaurau. These also, however, add further uncertainty in terms of region-wide development patterns."* We request the wording of this section to be changed to provide more support for these projects to direct growth.

Relief sought:

- **Place greater emphasis on accommodating growth along existing and future rapid transit corridors.**
- **Strengthen Principles 3 and 5 and Section 4.2.1.3 of the draft FDS to place more emphasis on investing in growth on the existing and future rapid transit network.**

➢ Appendix 9 - Waitematā Harbour Connections

The project team recommend working together on the final wording in Appendix 9: 'Information on major projects' for Waitemata Harbour Connections as project has evolved and further decisions have been made since this appendix of the FDS was written. The existing commentary currently lacks detail, focuses primarily on the crossing portion of the Project, and does not indicate the timing of when the project may occur. More emphasis should be placed on building a new rapid transit line on a different alignment to the Northern Motorway and connecting to new communities.

The connection between the WHC Project, Auckland Light Rail and the North West rapid transit project, and the overall importance of the future rapid transit network in shaping future growth in Tamaki Makaurau should also be made clearer. The project team suggests that a future rapid transit network is included in this appendix, or within the main text of the FDS, to show the future network and how it will influence growth.

Relief Sought:

- **Update the description of the WHC project is provided in Appendix 9, in collaboration with the Project team.**
- **Provide more emphasis on the future rapid transit network, both as it relates to WHC and Auckland Light Rail / North West.**

➢ Mahi tahi – Working Together

The WHC project team would like to emphasise the need for our teams to work collaboratively to agree outcomes for the FDS, given the significant influence the Project will have on this strategy. The project team recommend that the FDS should respond to the outcomes of the WHC project and vice versa to ensure consistency and alignment of strategy.

It is appreciated that the initial consultation draft did not have the detail at hand to provide a clearer direction regarding some of the major infrastructure projects to occur in the city. However, as the WHC project progresses and further decisions are made on the path to a recommended option, we would welcome meeting with Auckland Council to discuss the outcomes sought by the Project. We would appreciate any feedback from Auckland Council on how we can best facilitate a collaborative approach.

Conclusion

Thank you for the opportunity to provide and discuss feedback as to how this significant project aligns with the FDS, and how we can ensure there is clarity for the WHC project in achieving the outcomes sought in the FDS.

We look forward to meeting with you to discuss the matters raised.

Ngā mihi



Kathryn Martin

On behalf of the WHC Team

Future Development Plan 2023 #8221

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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

There needs to be both greenfield and brownfield growth. The elected Council must be flexible to the needs of a growing city over time as there is no one size fits all approach. Purely focusing on infill development will limit supply of housing and reduce choice in the market.

There will also be many unintended consequences of this such as needing to retrofit and rip out existing infrastructure on a wasteful ad hoc basis. Greenfield development can also be more efficient and have better modern urban design and improved local amenities among other benefits.

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

It is important to note that Greenfield development can also achieve this outcome as there will be new local centres for those new residents so this is not an exclusive benefit of existing urban areas. For example, Hobsonville Point.

In fact, it will be easier and more efficient to construct infrastructure such as cycleways and bus lanes in Greenfield areas as these can be designed and implemented from the start rather than needed to be retrofitted at great expense in existing brownfield areas.

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

Hazards must certainly be taken into account. However, an uninformed blanket ban approach as proposed by this FDS across large future urban areas is not appropriate.

Decisions should be based on detailed scientific analysis rather than pushing out a rushed FDS strategy to rule it out areas completely and ignoring all the previous expert studies and reports already done (and the ratepayer money that has already been spent to identify and zone these areas as future urban).

For example, the Council's own stormwater management plan for the Drury area that they commissioned with external experts Mott MacDonald (a leading global engineering and development consultancy) states the following:

"This Stormwater Management Plan provides guidance on how development can be delivered in accordance with the objectives of national and regional policy and guidelines. It has considered the stormwater constraints within the Future Urban Zone, as well as how to manage potential impacts on the downstream receiving environment. Delivered following a water sensitive design approach, development offers a significant opportunity to enhance the local water environment and address a number of existing stormwater issues."

This is a common theme throughout the report, the professional advice is that development offers significant opportunities to reduce stormwater issues and actually enhance the environment. Here is another conclusion from the report:

“The proposed change in land use, from rural to urban, offers significant opportunity to reduce existing adverse effects and enhance currently degraded environments. The Watercourse Assessment Reports (WARs) for the Slippery Creek, Hingaia Stream, Ngakoroa Stream and Oira Creek catchments identified management responses to address existing adverse effects and minimise potential future adverse effects caused by development of the FUZ”

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

This is particularly appropriate in future urban areas where there is undeveloped land and development can occur with a clean slate incorporating nature-based infrastructure such as rain gardens, swales, and detention basins in an efficient and cost-effective manner.

This aligns with the council's professional advice mentioned earlier, that development offers significant opportunities to reduce stormwater issues and actually enhance the local environment. This approach to prioritising nature-based infrastructure is much less practical in existing urban areas. In essence, this will an attempt to retrofit existing urban areas with nature based infrastructure. This will be inefficient and expensive to implement.

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 #8225

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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

Do not want more compact cities.

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

Do not want focus development near local centres. This feels like faxing in 20 minute cities!!

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

Focus on children’s education and jobs instead of climate change

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 #8248

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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

Denser cities make it easier to provide more amenities like public transport, walking and cycling infrastructure, and social infrastructure. It puts people closer to jobs, entertainment, family and friends, all of which can help to reduce travel or enable travel by lower emission methods. Additional infrastructure needed to support more brownfield growth also benefits existing residents.

Large amounts of greenfield growth make it much harder to provide all of this and adds significant costs to the council and government.
Furthermore, furthermore, Auckland's growth has over recent decades has shown that the vast majority of people are choosing to live in new homes within the existing urban area rather than greenfield developments. As such, it makes sense to prioritise that brownfield growth and reduce the greenfield growth available.

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 #8273

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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

The Submitter considers that greenfield development within the Future Urban Zone ("the FUZ") is part of the solution to managing Auckland's growth. It is accepted that intensification (infill) of

Page 3 of 11 the existing urban area is also an important means of accommodating growth. However, the two approaches can and should co-exist, in order to provide housing choice, efficient provision of
infrastructure, homes close to existing sub-regional centres and towns, workplaces adjacent to existing transport infrastructure and residential growth areas, and resilience in the face of climate change. The Submitter is of the view the coexistence of both greenfield and infill housing will provide the best opportunity of supporting a competitive land and development market

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

that land supply will continue to occur with a combination of urban consolidation, greenfield development, and the expansion of satellite townships;
(iii) that growth needs to be serviced by adequate infrastructure, with a range of funding options explored including innovative methods and participation by the private sector (investment and development)

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

that 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;
(v) That these principles are applied on an area by area basis to identify the release of land

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 attachment - Submission

Other feedback

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

Please see attachment - Submission

#8273

FEEDBACK ON THE AUCKLAND COUNCIL'S DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023-2053

To: Auckland Council

Name of submitter:

This submission provides feedback on the Auckland Council's draft Auckland Future Development Strategy 2023-2053 ("FDS").



Figure 1 – 24 Bristol Road, Hobsonville

We note that under the Auckland Future Urban Land Supply Strategy, dated 7 July 2017 ("the FULSS"), 24 Bristol Road is identified as development ready in the first half of decade two 2028-2032. This is indicated in Figure 2 below.

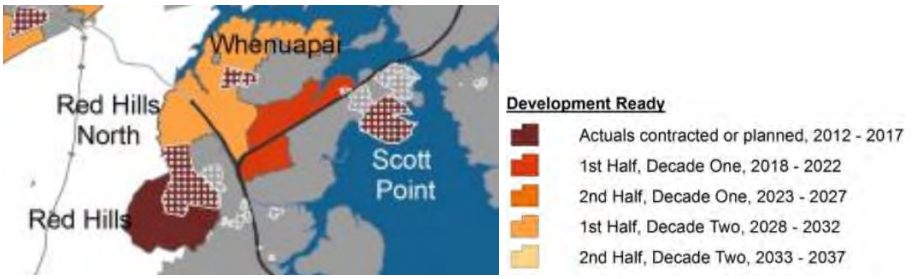


Figure 2 – Auckland Future Urban Land Supply Strategy Map

The submitter has the following feedback in relation to the provisions noted above:

1. That the current FDS is withdrawn for the reasons set out in the following feedback and the Council reengages with the community and key stakeholders to reconsider the approach to the FDS.

2. That the future urbanisation of Bristol Road is accurately captured in any eventual FDS document, and is noted as development ready land, with a proposed timing of 2025+.

The reasons for the submitter's feedback are:

Introduction

1. The Submitter has significant concerns with respect to the Consultation Draft of the Auckland Future Development Strategy 2023-2053 ("the FDS"). It shows 24 Bristol Road as having a new timing for urbanisation for 2050+. Refer map from the FDS for Whenuapai in **Figure 3**.



Figure 3: Proposed timing and approach for Hobsonville and Whenuapai Urban Areas

2. The Submitter is deeply concerned about the significant shifting of policy settings in the draft FDS. This approach creates significant investment uncertainty. Many land developers, including The Submitter rely on clear and consistent policy positions when undertaking expensive long term investment decisions.

3. The Submitter notes that Auckland's anticipated population and dwelling growth over the next 30 years has been planned for under the approved Auckland Plan 2050. The Submitter generally supports that Plan. The Submitter notes that under the current strategic framework, around 62 per cent of development over the next 30 years is anticipated to be within the existing urban area. The remaining development is anticipated to occur in future urban areas (32 per cent) and in rural areas (6 per cent).

4. Within this long-term strategic planning context, there is a need for consistency and certainty to enable efficient public sector investment in infrastructure and private sector delivery of development projects. While a review of the FDS is required (clause 3.16 of the NPS-UD) in order to align with three-yearly Long-term Plan cycles, significant change at these times is not considered to be appropriate as it will undermine public confidence in a consistent approach to strategic planning.

5. The Submitter considers that greenfield development within the Future Urban Zone ("the FUZ") is part of the solution to managing Auckland's growth. It is accepted that intensification (infill) of

the existing urban area is also an important means of accommodating growth. However, the two approaches can and should co-exist, in order to provide housing choice, efficient provision of infrastructure, homes close to existing sub-regional centres and towns, workplaces adjacent to existing transport infrastructure and residential growth areas, and resilience in the face of climate change. The Submitter is of the view the coexistence of both greenfield and infill housing will provide the best opportunity of supporting a competitive land and development market.

6. FUZ areas recommended for "further investigation" or "TBC" on the FDS maps (refer Figure 13) are vague, uncertain. There can be no reliance on the retention of the FUZ on that land over the longer term. Identifying land in that manner in the FDS is not an appropriate approach for a strategy that is intended to provide development and investment certainty.

7. Long-term identification of future urban areas (2050+, for example) contributes to planning blight of the land over an extended period. The effect of significantly delayed urbanisation on land that has been signalled for such growth is lack of investment, removal of any significant productive potential, and creep of unauthorised urban activities. The amenity of such areas is greatly reduced, and that is a poor outcome if sustained for any significant period.

8. There is also an element of natural justice and fairness to consider in relation to the draft FDS. Developers, investors, and the public generally will have made decisions based on the current FULSS and the broader development strategy contained in the Auckland Plan 2050. Anyone purchasing land in the FUZ will have paid for the land based on a value that is heavily influenced by the clearly signalled development potential. The only discount applied, relative to 'live-zoned' urban land, is that relating to timing. An investment of this nature, where the future development potential is now being removed or substantially delayed, could result in financial ruin. Guiding strategy documents around urban growth should not be altered in any significant way.

9. The Submitter understands that experience in Auckland since the advent of the AUP and the Auckland Plan 2050 has shown that, even with greenfield land available, at least 80% of new residential development has been established within the existing urban area. Auckland is well ahead of its intensification targets established in the AUP and Auckland Plan 2050, and further intervention is clearly not required.

10. The Submitter notes that the current the FULS outlined a programme for rezoning key parts of Auckland to enable growth. The only growth area subject to an Auckland Council plan change was Whenuapai (Plan Change 5). That public plan change was withdrawn by Council because of financial problems over infrastructure.

11. The Submitter notes that all other plan changes in north, west, east and south Auckland have relied on private plan changes to deliver the outcomes of the FULS. Without the private sector business and residential land supply (and housing costs) in Auckland would have been even more constrained.

12. The Submitter considers that is critical for Auckland that private investment and the provision of greenfield land is part of the solution.

National Policy Statement on Urban Development 2020 ("the NPS-UD")

13. The Submitter notes that the purpose of the FDS, as required by the National Policy Statement on Urban Development 2020 ("the NPS-UD"), is to set the high-level vision for accommodating urban growth over the long term and to identify strategic priorities to inform other development related decisions, such as the provision of infrastructure. The FDS seeks to promote long-term strategic planning by setting out the means by which a local authority intends to achieve a well-functioning urban environment, provide sufficient development capacity over the next 30 years, and integrate planning decisions with infrastructure planning and funding. This is intended to assist in deliver well-functioning urban environments that 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 as required by Objective 1 of the NPS-UD.

14. The Submitter also notes that Objective 2 of the NPS UD seeks to ensure that planning decisions improve housing affordability by supporting competitive land and development markets. From The Submitter perspective, it is important that sufficient opportunities are provided for a wide range of housing types and locations. This should include both Brownfield and Greenfield land. In the Submitter's view, this will provide the best opportunity to ensure suitable housing supply, the provision of housing choice and a competitive land market.

15. The Submitter supports the NPS-UD and intent of the FDS approach generally. It is important that Local and Unitary Authorities operate with a long term planning horizon to ensure that sufficient suitably live zoned land is made available to meet the short, medium and long term needs of the community.

16. The Submitter opposes the FDS being embedded into the Regional Policy Statement to restrict plan changes in FUZ. This will remove opportunities for advancing the urbanisation of land, where that can address housing needs and where issues such as the provision of infrastructure have been resolved.

Further analysis, consultation and engagement is required before the FDS adopted

17. The Submitter notes that under clause 3.15 of the NPS-UD, the Council is required to engage with a range of parties to prepare a draft FDS, including other relevant councils, central government, hapū, and iwi, infrastructure providers, and the development sector. The broader requirements in Policy 10 require the Council to *"engage with the development sector to identify significant opportunities for urban development*". Engagement with the development sector is also required to identify infrastructure requirements.

18. The Submitter considers that the Council has not complied with its requirements under clause 3.15 of the NPS:UD and Policy 10. Based on the information provided by the Council the following consultation was undertaken prior to notification of the draft FDS:

    (a) a survey was sent to property developers on the Council's database to understand developer trends and future intentions[1]; and
    (b) the Council engaged with The Property Council.

[1] We understand that the survey was sent to people who had recently lodged a building consent with the Council.

19. The Submitters are a key stakeholder in the development sector in Auckland. The Submitter were not sent a survey or provided an opportunity to engage or contribute to the FDS. The Submitter is unable to identify any property developers who were surveyed by the Council. It does not appear that the Council surveyed a large proportion of developers in Auckland.

20. The Submitter considers that the FDS should be withdrawn and reconsidered following meaningful consultation with the development sector and landowners in the FUZ. It should also be delayed pending the central government elections, the review and approval of Plan Change 78 and the completion of the business land capacity study.

21. In preparing an FDS in accordance with clause 3.15 of the NPS:UD, local authorities must use the special consultative procedure in section 83 of the LGA.. Section 83(1)(d) of the LGA provides that the Council must "*provide an opportunity for persons to present their views to the local authority in a manner that enables spoken interaction between the person and the local authority ...".*

22. Based on the information available on the Council's website, the Council is proposing to make changes to the FDS in response to written feedback and adopt the FDS in late 2023 without holding a public hearing. This approach is entirely inconsistent with the LGA. While the Council belatedly provided for one day for feedback, this invitation was not sent to The Submitter(or a number of large developers) and the limited dates that were provided were already fully booked.

23. The special consultative process is generally applied to matters that have high significance to the community and may have major implications. As set out above, the FDS will have a material impact on growth and development in the Auckland region. Developers, and the public generally, deserve to have their concerns heard and understood. This right under the LGA has been recognised in other regions across New Zealand including in Nelson (where hearings were held in April 2022 on its FDS) and Rotorua (where a hearing is scheduled for August 2023).

24. The Submitter requests the Council schedules a hearing on the FDS in accordance with the LGA to enable all persons who provided feedback with the opportunity to be heard (as required by section 83(1)(d) and (e) of the LGA).

25. The Submitter notes that limited changes can be made through the Special Consultative Process without triggering the need to re-consult. Effective pre-engagement is therefore needed. The Submitter considers that independent hearings are required to consider the evidence.

Residential Capacity

26. The Submitter considers that the draft FDS significantly overstates the ability of the existing urban environment to meet the housing needs of the Auckland community. The FDS is essentially relying on all of Auckland's future housing stock deliverability to be provided through infill development.

27. The FDS analysis appears to be based on plan-enabled capacity. The Submitter considers that there is a need to consider "*feasible and reasonably expected to be realised*" capacity by location and type.

28. There are many reasons why existing urban land may not be suitable for redevelopment. This includes the circumstances of the land owners, the existing capital investment on the land that makes redevelopment cost prohibitive, and the lack of suitable infrastructure capacity.

29. Noting the current recession and uncertainty in the housing market, a slowdown in the availability of greenfield land for housing development will result in a significant reduction in general housing stock availability. Whilst the length of recession is unknown, the current FDS will likely contribute to significantly lower housing availability and further delays in housing deliverability, and increased house prices over the short term.

30. Despite the assertion that the MDRS will significantly increase infill housing supply, The Submitter notes that since 2016 most of urban areas in Auckland have been able to develop 1-3 dwellings as a permitted activity. Despite this opportunity, the share of Auckland's dwelling growth that has been delivered by these smaller permitted activities is considerably less efficient than larger multi-unit developments and greenfield neighbourhoods. The Submitter has significant doubts that the MDRS will deliver a larger percentage of growth than the present situation.

31. The draft FDS will result in a significant reduction in available housing capacity, with no economic assessment of the overall flow on effects from removing or delaying such large areas of FUZ land. The Submitter notes that infill and redevelopment housing is generally 20-30% more expensive to build than greenfield housing. The reduction in land supply will place ongoing upward price pressures on houses, as experienced in Auckland since the introduction of the AUP in 2016.

32. The FDS targets urban growth only at Red Hills, Tāmaki; Mangere; Mt Roskill. These are very largely identified as the Kainga Ora redevelopment areas. These locations are too confined and will not provide for the necessary breadth of growth; and too limited in the geographic spread in terms of where people desire to live, and the breadth of lifestyle choice that people seek.

33. The Submitter notes that the Auckland Council has obtained a further 12-month extension for implementation of the MDRS under Plan Change 78. We understand that the primary reason is the uncertainty of the ability to intensify some existing urban areas due to the recent flooding events. There is significant uncertainty as the extent that these recent weather events will reduce the development capacity in the existing urban areas. The Submitter considers that it is premature to undertake changes to the FUZ (including staging) until Plan Change 78 has been approved.

34. The Submitter also notes that the FDS proposes to remove areas of FUZ, but there is no indication that the Council has considered areas outside the FUZ to address this reduction of land.

Constraining land supply directly impacts housing affordability

35. The key lesson of the 2000's and mid-2010's 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.

36. 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.

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

38. 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.

39. 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.

Business Land Supply

40. The Submitteracknowledges that the FDS is not just about delivering homes and housing, but it is also about well-located opportunities for business activity and community facilities, to offer good accessibility to employment and a range of household needs in the urban setting. These are all relevant matters when considering Auckland's Future Urban Areas. The Submitter notes that this is particularly relevant in the Auckland context which is a polycentric city which comprises a number of metropolitan centres throughout the Auckland urban environment from the Albany Metropolitan centre in the north to the new Drury Metropolitan centre in the south[2]. Locating employment land close to where people live will help address congestion issues and greenhouse gas emissions.

41. The draft FDS confirms that about 1,400 hectares of additional greenfield land for business activities is required in the long term. This includes approximately 1,000 hectares of land for land extensive business activities and 400 hectares of land enabling business activity and mixed use in centres and business areas. The land will mainly need to be accommodated in the Future Urban Zoned locations and these is an opportunity to ensure that such business land is also aligned with future housing and community infrastructure to provide the opportunity for people to live, work and play in their particular community. The lack of land use integration of both employment land and housing will lead to the reinforcement of cross regional transport demand which will exacerbate travel times, congestion and result in increased greenhouse gas emissions.

42. The Submitter considers that meaningful intensification of the existing urban area is an unrealistic option for industrial development, particularly for land-extensive floorplates. Provision for most of this growth will need to be in greenfield locations. The capacity alleged in the FDS is based on incorrect assumptions as to vacant land and an unrealistic assumption that brownfield business sites can be redeveloped at very high density. Some of the key assumptions in the draft rely on multi-story industrial development and very high building to land efficiencies. The assumptions are optimistic and need to be tested. The end result appears to be an over estimation of the available business land capacity s at present and an under-provision over the 30-year period.

[2] There 11 metropolitan centres across Auckland: Albany (emerging), Takapuna, Westgate (emerging), Henderson, New Lynn, Newmarket, Sylvia Park (emerging), Botany (emerging), Manukau, Papakura and Drury (emerging), plus the City Centre.

43. There is a significant undersupply of industrial land at the current time, even before further constraints are imposed as proposed in the FDS. Market research indicates that there is a substantial undersupply of large vacant industrial sites, particularly in the north-west of Auckland, yet the draft FDS proposes no new greenfield development in this part of the region until at least 2035+. That provision will fall short of the Council's land supply obligations under the NPS-UD.

44. The Submitter also notes that the Business assessment is not complete. This is a fundamental part of the evidence base that needs to be completed to inform the FDS. Without an adequate supply of employment land, Auckland risks reducing its competitiveness and business will relocate outside of Auckland.

45. The FDS should be delayed until this work has been completed.

FDS Identified Site Constraints and Flooding Matters

46. The FDS cites that there are a number of statutory and non-statutory documents that support the concerns raised in the FDS as reasons why growth in the FUZ should be slowed and further assessments completed. The includes documents like The *National Policy Statement for Freshwater Management 2020* which deals with sensitive hydrological spaces, inclusive of wetlands and streams. Sediment and erosion are controlled by consent conditions and Council's own GD-05 standards. The recent flood events have been identified as one of the reasons *to* prevent greenfield development due to several stated constraints.

47. The Submitter disagrees with the approach. The existing planning documents already provide a pathway and a consenting framework to address such matters. In any event, the potential for enhanced regulatory methods (i.e., even better stormwater performance requirements) should have been considered as options. It is also noted that the requirement for structure planning and an eventual Plan Change provides more than sufficient controls to ensure that site constraints (including Natural Hazards) are identified and suitably addressed.

48. The Submitter considers that there is ample opportunity (and land) to masterplan developments to manage natural hazards and stormwater issues and, as noted above, there are already sufficient controls within the Unitary Plans to manage such effects.

49. The Submitter also notes that it is likely that additional qualifying matters, such as flooding, would prevent or delay development under the MRDS until this aspect of development was resolved. The current uncertainty around the final outcomes of Plan Change 78 and the MDRS (including the 'theoretical yield') further highlights the lack on certainty of the ability for the Policy framework to provide suitable housing choice to the Auckland community.

50. The Submitter is of the view that density done well, designed in an integrated manner from the outset with good modern infrastructure standards, is far superior to ad-hoc and fragmented infill in older, often car-orientated neighbourhoods with very poor infrastructure.

Governmental Uncertainty

51. The Submitter notes that the National party has signalled that it will likely make the MDRS "optional". There is current significant uncertainty as to whether they will continue to support and deliver the capacity envisaged under the MDRS. Should the approach to the MDRS change

Council will be left with a FDS that serves a limited purpose and provides for a watered-down infill approach relying on infill uptake much like we already have under the AUP, but with a diminished ability to bring in greenfield land.

Infrastructure Services and Funding

52. The FDS assumes that only the Council will fund core infrastructure. This is not correct, and on many projects the developer funds and delivers the infrastructure. The infrastructure triggers in the FDS are unclear and appear to assume that all infrastructure needs to be delivered before rezoning occurs. This is also unrealistic as the private sector will not invest in the absence of certainty about land use outcomes, as it is the approval of land use that enables developers to secure funding for the infrastructure. The Council is very unlikely to be in a position to fund the required infrastructure and it needs to work in partnership with the private sector to deliver the infrastructure and land use outcomes required.

53. The Submitter considers that providing infrastructure in the FUZ integrates suitably sized infrastructure from the beginning. Because it is a 'clean slate', there is an opportunity to design and size infrastrucure within the context, use the land effeciently and maximise development, and the investment that the Council makes. For existing communities on the urban/FUZ interface, greenfield development may enable additional critical mass and additional economic support for their local neighbourhoods.

54. The Submitter notes that in terms of greenfield areas, on site infrastructure is generally funded by developers. Offsite infrastructure to meet the demands of growth is largely funded in accordance with an approved Developer Contribution Policy or other approved funding framework.

55. The Submitter considers that the FDS significantly underestimates the costs and feasibility for retrofitting infrastructure into existing brownfield areas. There are also significant issues with the ability for developers to obtain a "rights of entry" to access infrastructure on private land. This issue already frustrates intensification under the current Unitary Plan provisions and it will not be addressed by PC78.

56. There is very little mention of development contributions as a means to resolve funding shortfalls often cited in the FDS, notwithstanding large-scale development proposals almost always (via the Plan Change Process) incorporate transport and infrastructure upgrade triggers as part of any successful rezoning. We can only presume that the Council has no appetite to contribute any funding to future FUZ developments in the short to medium term, hence why this option has been almost entirely discounted from the FDS. Developers have (for some time) successfully shared the cost of greenfield redevelopment in previously identified FUZ areas – through both standard development contributions required under conditions of consent, and/or by infrastructure growth agreements with services providers.

57. The Submitter consider that where infrastructure investment has occurred, those areas should be prioritised so that a return can be obtained from the funding that has already been invested. For example, Council and its CCOs have invested $181m for the Northern Interceptor bulk wastewater line and North Harbour 2 watermain, both of which are required to service the Whenuapai area. Another example is Drury South.

Conclusion

58. A quality FDS will support economic competitiveness over the next 30 years. To prepare the draft FDS, the NPS-UD requires engagement with the development sector (to identify significant future development opportunities and infrastructure requirements) (clause 3.15).

59. This is needed because developers ultimately implement the FDS – providing for growth in the wrong locations means supply will fall short of demand with flow-on effects for housing affordability and business productivity.

60. The FDS seeks to promote long-term strategic planning by setting out the means by which a local authority intends to achieve a well-functioning urban environment, provide sufficient development capacity over the next 30 years, and integrate planning decisions with infrastructure planning and funding. This is intended to 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.

61. There are significant omissions in the Draft FDS with the exclusion of the existing and future urbanisation occurring at Whenuapai and Hobsonville.

The submitter's concerns would be addressed if the draft Future Development Strategy was amended in the following way:

- That the current FDS is withdrawn for the reasons set out in the following feedback and the Council meaningfully engages with the community and key stakeholders to reconsider the approach to the FDS.

- That the future urbanisation of 24 Bristol Road is accurately captured in any eventual FDS document, and is noted as development ready land, with a proposed timing of 2025+.

- That no changes are made to the FUZ (including staging) until Plan Change 78 has been approved.

- The FDS should be delayed until the Business Capacity Assessment has been completed.

- The Council should work with the community and key stakeholders, including the residential development sector, to develop key principles including:

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

  (ii) that land supply will continue to occur with a combination of urban consolidation, greenfield development, and the expansion of satellite townships;

  (iii) that growth needs to be serviced by adequate infrastructure, with a range of funding options explored including innovative methods and participation by the private sector (investment and development);

(iv) that 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;

(v) That these principles are applied on an area by area basis to identify the release of land;

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

(vii) enable and support 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 aspires to achieve;

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

- Any consequential changes where these are required to give effect to the relief outlined above.

The Submitter appreciates the opportunity to provide informal feedback on Auckland Council's draft Auckland Future Development Strategy 2023-2053 and thanks the Council staff and elected members for their time in considering the matters that have been raised in this submission.

The Submitter would welcome contact from staff in the FDS team if any clarification or further information is required.

Date: 31 July 2023

Address for service of submitter:

Attention:

Telephone:
Mobile:
Email:

Future Development Plan 2023 #8279

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

Because they usually need the most reconstruction

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

Because we need to restore and help our environment.

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 #8281

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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

To help the future generations, and stop the contribution to global warming by not building out into our native fields.

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

To lighten the effect of global warming, by not having to drive everywhere.

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

Places that are already at risk shouldn't be put at more 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?

Agree

Tell us why

This is setting up our future generations for success.

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 #8283

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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?

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 #8284

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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?

I don't know

Tell us why

Because I don't have enough knowledge to have on opinion on this.

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

Auckland has a huge variety of suburbs that have a lot of different problems.

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 climate change is a big problem.

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
I think it'll be a great way to start solving environmental problems in New Zealand.

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 #8285

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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?

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?

Car traffic and bus traffic are well managed. As for disasters, there are many rain disasters in New Zealand, so I think it's okay to worry about landslides.

Future Development Plan 2023 #8287

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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?

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 #8288

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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.

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 #8289

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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

Haven't really researched about it to much but I somewhat agree because anything that supports the environment is a good thing.

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

I think it could be a good start.

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

I think it is good because the environment is toxicated with bad air.

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 think the world is evolving which means I'm not too sure about using nature because technology etc. is the future.

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 #8290

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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.

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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

I like having everything close by.

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
I think that it is important to have reliable ways to combat hazards.

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
I think it is important to have a sustainable future.

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 #8292

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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?

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 #8293

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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

I think Auckland is fine how it is.

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

Prices are too expensive now so making things easier are great!

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

This is a great idea!!!

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 #8294

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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

I think that it is important that we work towards growth that will improve the environment & economy. Keeping land is also valuable for our future communities.

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 think that some communities are quite disconnected so building environments where there are foundations in place for interconnected environments, business & residents in something, support & agree with.

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 really take into consideration our land and environmental conditions before building as this could lead to longer term implications effecting our environment & communities.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Regenerative infrastructure is important to the future of Auckland & NZ's residents. We need to work with the land instead of going against it.

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 #8295

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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

More variety in development, more infrastructure all around.

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

Better for locals near the area, easy to access urban fully developed.

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
Waste of construction and valuable resources.

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
Better for the environment, more sustainable for the long run.

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 #8296

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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?

I don't know

Tell us why
I am not familiar

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 for locals in the area after 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?

Agree

Tell us why
Wasteful to valuable resources

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
It would be helpful for the environment

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 #8298

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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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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 refer the attachment

AUCKLAND COUNCIL

FUTURE DEVELOPMENT STRATEGY



SUBMISSION OF TE AHIWARU TRUST

	SIGNATURE	DATE
PREPARED BY [redacted]		
REVIEWED BY CO-CHAIRS		
APPROVED BY TE AHIWARU TRUST		

CONTENTS

MIHI / INTRODUCTION

WHAKATAKI / BACKGROUND

MANA WHENUA O TE AHIWARU

WHAKAHONORE TE TIRITI ME NGA WHAINGA

MIHI

Ko Hape te rangatira.

Ko Kaiwhare te taniwha.

Ko Mataoho te tupua.

Ko Puketaapapa, ko Waitomokia,

Ko Maunga Taketake, me Ootuataua ngaa maunga.

Ko Ooruarangi te awa.

Ko te Manukanuka o Hoturoa te moana.

Ko Makaurau te marae.

Ko Te Ahiwaru te hapuu.

I ngā wā o mua, kia tukuna mai ou mātou tūpuna ngētehi tino hiahia mo te mana motuhake o ngā whanau o Te Ahiwaru, Waiohua me te Marae o Makaurau. Te Tokowaru rau I ngā tau kia whaiwhaitia i ēra wawata mōna whakatupuranga.

Kia rātou ma, nei rā te mihi, Tēnā Koutou, Tēnā Koutou, Moe mai kia koutou katoa.

WHAKATAKI

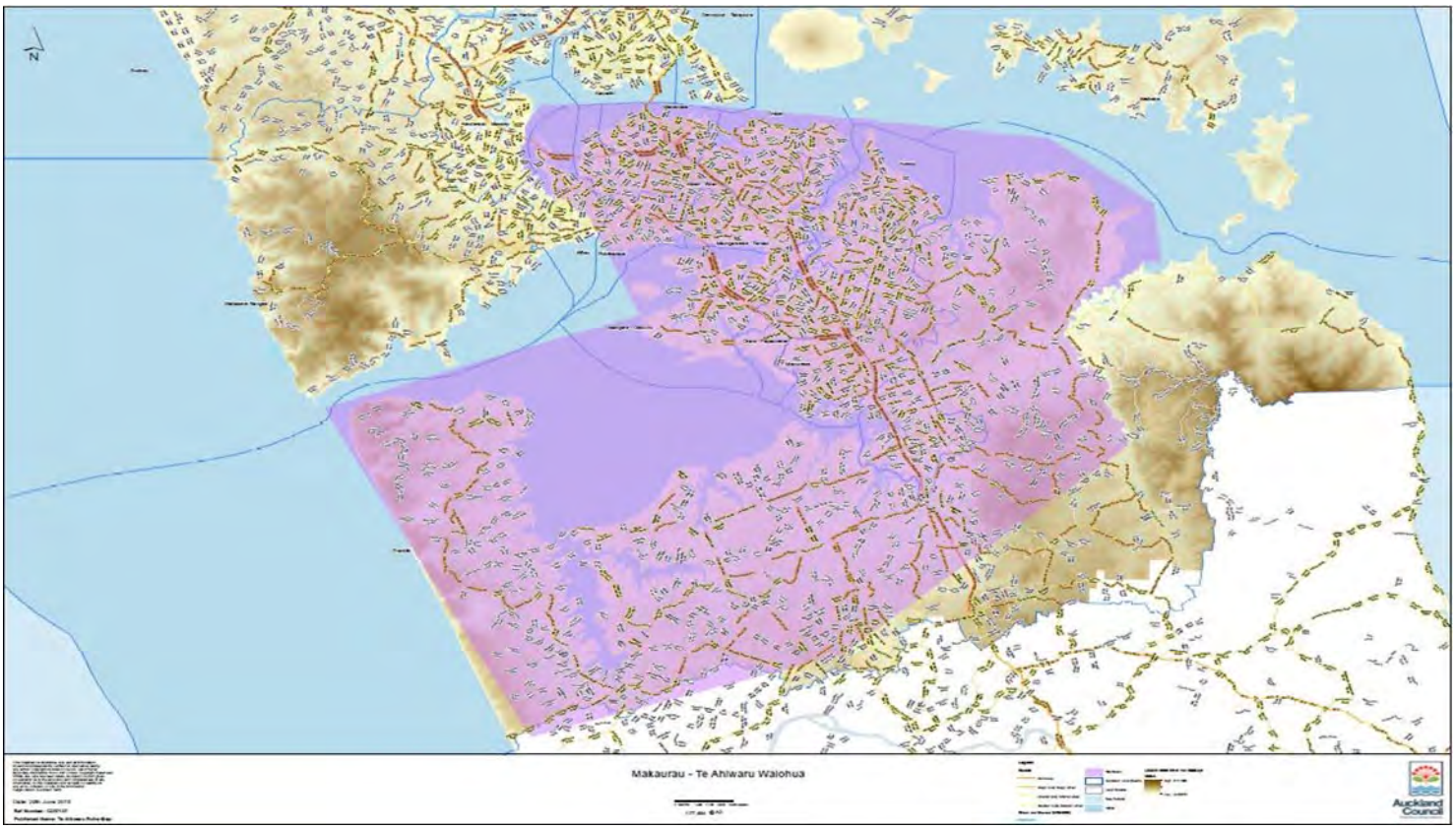
This submission to the Auckland council Future development Strategy is submitted by Te Ahiwaru Trust and on behalf of Te Ahiwaru hapuu of Waiohua / Waikato. The above pepeha identifies the locality of our turangawaewae (tribal hub) central to our entire mana a rohe (tribal area).

Our tribal register acknowledges over 800 beneficiaries living across the Auckland region. Cultural diversity is an evolutionary message that our mokopuna continue to embrace and they are the future well-being of our Iwi. Hononga I maarena mai ki Te Ahiwaru, Rarotonga, Kiripati, Niue, Hamoa, Iinia, Tonga, Haina, Hapani, Tararaa, Paakeha me rere tonu.

The submissions quantum for the Future development strategy offers little assurance to Te Ahiwaru and that the essential sections of the National Policy Statement for Urban Development would be adversely ingested, prompting the reactive mitigation of mana whenua groupings, rather than the proactive inclusion of Te Tiriti partnering. Auckland council's interpretation of Qualifying matters was inconclusive at the early stages of mana whenua engaging the NPS for Urban Development strategies at Regional Government levels. Therefore, thwarting the visioning exercises given the Resource Management Act and 3 Water reforms in processing a National Iwi co governing prospectus,

Whilst this feedback submission will respond to the target queries for Public opinion, Te Ahiwaru submission will address the aspiring intent and acquisitions of our iwi that trigger avoidance alarms and mitigable measure fundamental to the upkeep of Te Tiriti based relations and preserving the national importance of our culture and Te Ao maori environs.

TE MANA AA WHENUA O TE AHIWARU



WHAKAHONORE TE TIRITI ME NGA WHAINGA

Listed here as high level priorities for Te Ahiwaru iwi, the listed urban development values and aspirations of Te Ahiwaru are:

Mana Motuhake
The rights of Te Ahiwaru to appropriately lead Te Ahiwaru future vision, participation and developmental needs. i.e; Priority, Location, Pace, Methodology, Performance, and permanence.

Rangatiratanga
The rights of Te Ahiwaru to determine our leadership and their contributions to engagement strategy, consensus baselines, avoidance measures and mitigable terms for the health and wealth of Te Ahiwaru iwi.

Matauranga / Kaitiakitanga
The expectation of engagement to be valued, reflected, adopted expertly and inherently as the forever occupants of Taamaki Makaurau ki te Tonga.

Mauri
The acknowledgement that inappropriate urban development in our rohe affects Te Ahiwaru whanau and future generations mentally, physically and spiritually.

Manaakitanga
The recognition of mana a whenua for Te Ahiwaru korowai Manaaki. Our resources natural and intangible are the health of Te Ahiwaru and our support structure.





FUTURE DEVELOPMENT STRATEGY

Impertinent to Urban Development across Te Ahiwaru mana a whenua, feedback is focal to the following listed:

- FDS PRINCIPLES 1-5
- SCENARIOS A & B
- DEVELOPMENT CAPACITY DWELLINGS & BUSINESS

National transport influences over Auckland city are being applied in adhoc rushed evaluations. Example reference:

- Auckland light rail
- Southern Corridor

Challenges in addition to those verbally submitted on 15 Mar 18, as a result of Transport, NZTA, Auckland Transport, Freight forwarding, Ports, Rail, Buses, Cars, Ferry Services Infrastructure and Traffic Management

- Transport Movement and Infrastructure in and around Papakainga is not assessed on its impacts upon Maori Cultural Practices and Customs
  e.g; Te Ahiwaru at Makaurau Marae honor our deceased with a final walk over their lands from Marae to Urupa. The walking route goes through a main arterial route. To the general public this practice can be interpreted in two different ways; fascinating with a desire to capture the experience or morbidly with fear and disrespect.
- Public Transport Services are either absent or difficult to access around areas such as papakainga for Te Ahiwaru.
- Traffic Island systems and/or Road closure options are required to protect the integrity of papakainga as a significant site continually occupied.
- Transport infrastructure is obstructing accessibility and increasing the negative impacts of sediment runoff to our traditional food resource areas

- Auckland Rail Hubs and Frequent Bus Networks draw focus to businesses, town centers and retail hubs. A priority of the transport network is to reduce car omissions and increase public transport, cycle and walking shared paths to move people.
- New transport infrastructure is impacting on sustainability of Natural Resources including water quality runoff and groundwater tables.
- Existing transport infrastructure has ongoing issues with sub-standard low cost upgrades requiring regular maintenance and prolonged impacts to Natural Resources including water quality.

Recommendations – We do not support the regional fuel tax of 10 cents per litre. Due consideration should be sought to:

- Support our prioritization to protect Papakainga, cultural practice, traditional food resources and integrity with a clear assessment and pre-engagement strategy over (existing and potential, major or minor) transport projects and road infrastructure
- Give due consideration to our incentives for protection of Lands, Freshwater and Sea that we may deem necessary for the retention of our Te Ahiwaru culture and traditions, i.e; Safer streets, Road closure, Papakainga recognition signage, High quality water treatment devices near our traditional food gathering waterways.
- Support the objective of Rail and Frequent Bus Networks to move people. Shorten walking distances to frequent transport networks by designating residential zones closer to the public transport networks.
- Prioritise a consistency in Environmental gains across all transport projects and business cases (CapEx or OpEx) – Wetlands not Ponds, Vegetated swales and Raingardens. Functional and Aesthetic cohesion.
- Enlist a Quality Assurance and Key Performance Indicator Program of road construction contractors, incentivize innovative construction businesses who are working above grade.

Water Quality Improvements

Challenges as a result of Pollution to Aucklands harbours, beaches and streams. Network Discharges from development existing and proposed infrastructure and operations of Wastewater and Stormwater.

- Oruarangi Awa and its mother source the Manukau Harbour receive prolonged negative impacts as a result of inconsistent catchment management plans, water quality treatment methods and discharge consent variations of privatized and council managed facilities.
- The compartmental assessment of waterway interests continue to accelerate erosion issues to Papakainga and Urupa that are a priority to Te Ahiwaru
- Prolonged remediation support from Auckland Council and its partners have resulted in highly vulnerable statuses and delayed achievement of Traditional food resource areas Restore, Reseed and Regeneration initiatives intended by Te Ahiwaru.
- Auckland Council Healthy Waters Department and Watercare Services Ltd share the responsibility of qualitative and quantitative water discharges to Auckland's environment, they are working in isolation without regard to a holistic and co-operative approach to the value of Auckland's Natural water resources.
- Climate change is a very real and an inevitable challenge impacting on Auckland. Auckland is using and abusing more natural resources than it is restoring.
- Aucklanders attitudes toward Beaches, Harbours and Streams is borderline malevolent due to lack of understanding the impact of their behavior. Advocacy for the user pays and penalty fines, is not a sustainable measure of responsibility (Money cannot replace a lost resource)

Recommendations – We give partial support to the proposed target rate of $66 per year, pending due consideration is given to:

- Merge the Managing interests of Watercare Services Ltd and Auckland Council Healthy Waters Department to decompartmentalize the value of Aucklands water resources.
- Support the priority of Te Ahiwaru advocacy and aspirations as briefed at the Te Ahiwaru presentation before the Auckland Council committee (15 Mar 18) and provided in detail as Oruarangi Mauri Enhancement (appendix 1) for acknowledgement of Maori well-being, Belonging, Water quality improvement and submission to Auckland Council's Network Discharge consents from Te Ahiwaru.
- Invest in Te Ahiwaru kaitiakitanga responsibilities by resourcing and enabling co-developed education and employment growth of our people and procurement strategies with our partners.
- Support and provide accessibility of Te Ahiwaru and Community group efforts of restoration and maintenance.
- Support Auckland councils Environmental and Technical Services Team and their work toward Guidance Documents by progressing them into supportive legislation (i.e; GD01 and GD05).
- Prioritise high quality treatment of roofwater to recharge existing reservoirs and aquifers of Auckland for Auckland and minimize the dependency on outsourced watertakes i.e; Waikato River
- Support the merged assessment of catchment management planning and Industrial zone designations as an informative tool to deviate away from unmanageable water pollution scenarios
- Intensify information sharing of Aucklands positive and negative impacts on beaches, lakes, streams and their current state via television and social media

Regional Pest Management and Native species protection

Challenges as a result of Pest Management and Biodiversity:

- Te Ahiwaru endorse the minimisation of agro-chemical use in Pest eradication and are forced to compromise those values due to lack of council resources and new biosecurity issues.
- Auckland Council do not provide sufficient funds or opportunities to resource active kaitiakitanga roles in pest management, control and eradication.
- Monitoring and tracking biosecurity needs prompt isolation and follow up

Recommendations - we give support to option 3B, a $47 per annum increase toward Environmental Inititatives pending due consideration is given to:

- Improve the assessment criteria for ecological threat by endorsing a holistic land, water and sea impact assessment
- Support Rahui as and where necessary to assist in the isolation and remediation of ecological threats.
- Prohibit exotic flora and fauna sales in Auckland and New Zealand
- Proactively engage on existing and new data, tracking and monitoring kauri dieback and myrtle rust requires quick action

Questions relating to the Auckland Plan 2050

AN INCLUSIVE AUCKLAND

Auckland's Environmental prosperity is an imperative value across each of the focal areas of the Auckland Plan 2050. Without due consideration to the natural environment none of Auckland's Plan is sustainable.

BELONGING AND PARTICIPATION

Through an inclusive Auckland plan where Reo, Tikanga and Matauranga are shared, Aucklanders are encouraged to appreciate that centuries of Mana Whenua identity is sealed in the Auckland landscape. Unlike many others, this is the motherland that Maori connect and belong to, there is nowhere else for us.

Maori statistics are often stacked as a minority field against Pacifica collectivized as one. In terms of representation of individual cultures and diversity the balancing is inadequate. Pacifica fuses the collective of Samoan, Tongan, Fiji, Tokelau, Rarotonga into one though the cultural traditions are independently different. Auckland Plans utilize the information subjectively in various Local Board Plans. This does not represent “Taamaki Herenga Waka” in Te Ahiwaru opinion.

Future Development Plan 2023 #8299

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Your feedback

Focusing growth

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

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

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

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

Tell us why

Please refer to the attachment

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?



UDINZ Submission on Auckland Council's Draft Future Development Strategy (FDS) - July 2023

UDINZ

creating urban communities together

UDINZ Submission on Auckland Council's Draft Future Development Strategy (FDS)

SUBMITTER DETAILS FULL NAME:
Urban Development Institute of New Zealand (NZBN 9429047714335/Incorporation Number 50011540)

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About the Submitter

The Urban Development Institute of New Zealand was formed in 2019 and was officially launched in 2020. It has a national board and currently has three chapters respectively in Auckland, Wellington and Christchurch, with further chapters in planning including an Otago Southland chapter based in Dunedin.

It has in excess of 120 organisational members from across the development ecosystem. UDINZ was formed with the intention of bridging the gap between the public and private sectors so as to remove barriers to quality urban development. We do this by bringing insights and industry together for the benefit of people and communities.

The intention is to share knowledge, international best practice and new technologies and increase transparency across the system to reduce uncertainty for all that are part of development processes. The objective is resilient, sustainable and healthy communities for all in Aotearoa. Around 86% of New Zealanders live in urban areas, but there is little consensus about what makes a "sense of place" in those communities. There are many contributing factors. UDINZ focuses on issues that its members broadly agree are relevant and compelling and in relation to which UDINZ can effect change. It aims to lead the development of an "NZ Inc" approach.



UDINZ:

- Defines and advocates for a new urban development paradigm for Aotearoa New Zealand;
- Provides an environment for the sector to work together including with central and local government agencies to build relationships and understanding that reduce uncertainty and increase consistency between policy jurisdictions, as well as aligning policy and implementation;
- Runs events that bring the sector together to discuss issues and facilitates collaboration around best practice- connecting and coordinating people working in urban development;
- Builds knowledge through provision of data, evidence-based research and domestic and international learning as well as case studies demonstrating different approaches and best practice; and
- Provides and supports talent development and training in areas particular to the advancement of good urban development.

Overarching comments

There are a range of views amongst the UDINZ membership about the merits of what is being substantively proposed in the Auckland Council Future Development Strategy (FDS).

Some members do support in varying degrees the apparent intention to implement densification. Others are of the view that the approach taken (whereby brownfield development is favoured to the exclusion of greenfield development and decisions around Future Urban Zone land are reversed to the detriment of many who had previously invested in land and proposals to develop land in these zones) is a binary approach that lacks nuance, fails to account for the actual and convertible capacity in brownfield areas and makes assumptions about infrastructure capacity and costs of delivery that are incorrect.

In essence, our UDINZ view is that both greenfield and brownfield development are required for the reasons outlined below and that residents should be given greater choice around location and typology than is likely to result from the FDS.

We are also concerned about the way in which consultation on the FDS has occurred and what appears to be a failure to follow the methodology set out in the NPS UD.



Procedural concerns

The requirements

The FDS is a requirement of the Government's National Policy Statement on Urban Development (NPS-UD). https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-updated-may-2022/

An FDS is a high-level plan that sets out the general direction for growth that will help to promote the long term social, economic and environmental wellbeing of Auckland residents. The FDS identifies the choices and trade-offs that have to be made, as well as the benefits that will flow from well managed development.

The FDS must then be regularly reviewed and updated to inform future long-term plans.

An FDS needs to show:

- the broad locations for growth capacity (in existing and any new urban areas) over the long term (30 years);
- strategic infrastructure required to support and service that growth, including any corridors or sites required; and
- development constraints.

It must also include a clear statement of hapū and iwi values and aspirations for urban development.

The National Policy Statement on Urban Development (NPS-UD) says that, at a minimum, "well-functioning urban environments' are ones that:

- have or enable a variety of homes that meet people's needs in terms of type, price, and location;
- meet the needs of businesses (including by way of having a variety of sites suitable to different sectors);
- enable Māori to express their cultural traditions and norms;
- support market competition;
- have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;
- support reductions in greenhouse gas emissions; and are resilient to the likely current and future effects of climate change It requires that the FDS identifies, for housing and business and for both the medium and the long term:

Under the NPS-UD, Councils have to assess future demands for housing and businesses, identify the capacity of existing plans to accommodate the future growth and plan for the extra housing and necessary infrastructure.

It requires that the FDS identifies, for housing and business, and for both the medium and the long term:

- Demand;
- Existing feasible development capacity identified in housing and business development capacity assessments;
- Future feasible development capacity; and
- The broad location, timing and sequencing of future development capacity over the long term.

The HBA must quantify the development capacity that is sufficient to meet expected demand for housing and business land in the short, medium and long term.

There are a wide range of factors that are likely to influence future housing demand. Some commonly identified influences include:

- there will be more older adults, but under a high growth projection there could also be many more people of working age;
- housing needs to be more affordable for people on low to moderate incomes;
- climate change will see sea levels rise and more extreme weather patterns;
- how and where people work may change;

- types of infrastructure may change, for example rather than reliance on large networks, there may be more small scale, locally based systems
- roads will get busier and so alternatives like building up public transport and walking and cycling networks are needed; and
- different models of housing and living arrangements may become more desirable are resilient to the likely current and future effects of climate change.

The HBA that is required must quantify the development capacity that is sufficient to meet expected demand for housing and business land in the short, medium and long term. Sufficient development capacity' for residential land means plan-enabled, infrastructure ready, feasible and reasonably expected to be realised. Councils must allow for development capacity with a competitiveness margin (20% for the short and medium terms and 15% for the long term) over and above the expected demand for both housing and business.

Failure to properly assess development capacity

Here:

- No HBA has been completed for business land.
- The HBA for residential land is incomplete. A revised version meeting all the mandatory requirements will not be published until after the consultation period on the FDS is over.
- There is reference in the Draft FDS to a total plan-enabled capacity of 2,345,500 dwellings. This is based on the evaluation of development capacity done as part of the Section 32 evaluation for Plan Change 78 (PC78).
- Development provided by PC78 is not 'plan enabled' because this plan change is not operative and likely to change as a result of the natural hazard work being undertaken and then subject to decisions by independent commissioners who may make significant changes.
- The FDS does not provide for a competitiveness margin in its residential and business capacity figures.

We would be willing to help facilitate engagement from our membership and beyond were steps taken to rectify these shortcomings.

Failure to consult meaningfully

In order to prepare the draft FDS, local authorities must engage with the development sector to identify significant future development opportunities and infrastructure requirements. A representative of the UDINZ Auckland Chapter reached out to Auckland Council to seek to have a group of members meet with Council in late 2022 as the FDS was being developed, but no meeting ensued. It is understood that Auckland Council met only with the Property Council and Kainga Ora and that it surveyed developers with 30 responses received.

The period of consultation provided was grossly inadequate and the extension period through to 31 July 2023 (coinciding as it did with the July school holidays) meant many in the sector were not able to meaningfully engage with the process, despite the extension, due to family responsibilities.

In the round there has not been sufficient time for the sector to properly consider and comment on the proposed draft FDS.

Action required

Our opinion is that Council should withdraw the FDS and restart the process. A document of this complexity requires an extensive period of consultation with those impacted by it. A recent UDINZ event on the FDS was significantly oversubscribed. Despite the capacity of that event being twice extended some attendees still had to be waitlisted. This is an indication of the level of interest within our membership on this topic. We believe there are many who would be willing to engage constructively with the Council to inform a revised document were one to be provided.

We outline below some facets we believe are relevant to a discharge of Councils responsibilities under the NPS-UD in determining sufficient development capacity' for residential land that is plan-enabled, infrastructure ready, feasible and reasonably expected to be realised.

Substantive comments

Overestimation of latent potential

Those working to get housing developments across the line have reported that they consider modelling on the potential of existing residential (brownfield) zones often overestimates its latent potential, with the FDS being no exception. That's because of assumptions about capacity and conversion that are just not warranted.

As noted above in the FDS, assessment of plan-enabled capacity seems to have been based on the evaluation of development capacity done as part of the section 32 evaluation for PC78. 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.

Assumptions about extent existing infrastructure can accommodate intensification

The first assumption on capacity is we can simply intensify a standard ¼ acre block. However the rules around impervious areas and the constraints of the existing stormwater and waste water infrastructure mean, even using the parameters of PC 78 and the MDRS, a brown fields intensification is not as simple as it might seem.

It may be possible to accommodate and absorb needs of the first few developers, but after those first lucky few, intensification at the scale required rapidly outstrips the capacity of the existing infrastructure. Greening up, rain gardens and the like incorporated within well-sited developments and more thoughtful public realm development (trees and planting schemes) may help, but the existing water and wastewater constraints still operate as a brake on development (demand management the only lever there). Without extensive upgrading of public infrastructure in urban areas, the flooding we have seen in Auckland earlier in the year will continue.

It's also expensive and complex to install new pipes in such areas. The cost of putting in new pipes, some suggest more than four times the cost of putting new pipes in new developments, rests with the public sector and is not fully recouped via recovered development contributions in these areas (Watercare assesses Development Contributions as contributing only 11% of the cost of new development.) It's hard too for all utilities to assess when and where infill development will occur, putting them constantly in catch up mode.

Assumptions about scale of intensification possible in residential zones

The second capacity assumption is the scale of intensification that can be achieved. Developers in Auckland report that the way in which PC78 (Councils response to the National Policy statement on Urban development) is drafted means its actually more likely to yield 3 dwellings per site (and may be limited to certain typologies) than the projected latent capacity of 5 many had touted. This is because of the raft of rules and restrictions that need to be considered.

Brownfield sites often too small to achieve good urban and sustainability outcomes

Intensifying on small brownfield sites also has a tendency to attract small builders/developers with (generally speaking) smaller areas of influence, making it harder to achieve cohesive and well considered urban design outcomes overall at a system level. Land holdings are dispersed and it is hard to achieve the scale required to address all facets of properly designed densification.`

The use of brownfields as the predominant source of land supply, involving as it often does the demolition and disposal of existing dwellings and other built environment elements, can be more unsustainable and carbon intensive than one might initially consider.

Assumptions about conversion of latent capacity

Council's models also have not historically taken account of the fact that not all theoretically developable sites will be intensified. Some developers call this the conversion factor - whether the business case for development stacks up. That is currently more difficult than ever to achieve with neither the current cost of capital (for both developers and future homeowners) nor the prudential controls in play, assisting. And that's before we even factor in nimbyism.

Some residential land already used for social infrastructure

Not all areas zoned for residential can and will actually be used for residential. Some of these areas are already occupied by community and educational facilities. It's highly unlikely use for social infrastructure of this type would be eschewed in favour of redevelopment for housing. It appears in the FDS that some such land has been included when assessing land available for development.

Public transport not yet sufficient to justify transition

Transport further complicates the picture. All things being equal, better transport and housing intensification are mutually supportive. The trick is where to start. Some thought it would be the removal of private parking requirements. In theory this should operate to drive residents towards other transport options and also deliver more square metreage thereby optimising site utilisation. In reality however at this time the lack of viable public transport and active transport options and frequency considerations mean many remain heavily reliant on their cars. Anecdotally the removal of on-lot parking requirements seems only to have pushed private vehicles into the public realm, in turn making walking and cycling optionality more difficult to achieve, and clogging our already congested streets.

Incorrect cost assumptions made too about greenfields

Greenfield options are also not without their complications. Land prices are cheaper as you go out, but this is reflective of transport and infrastructure availability concerns and costs. Theoretically the infrastructure should be installed before or at the same time as development occurs. And then there's a question from some on who is paying for what. They ask is the spend required to service greenfield infrastructure overstated when one bears in mind the reality that the Council don't pay for infrastructure within a greenfield development, only for the "trunk" infrastructure that feeds it. Also the main arterial roads/motorways and rail upgrades are mostly funded by Central Government, aren't they?

Add to that the proposed changes to the development contribution rules, which are designed to disincentivise greenfield development because of the (flawed) assumption that housing needs can be met almost exclusively from an up, rather than out, policy.

This new policy is said to be designed to help ensure developers share (and pass onto homeowners) the cost of council investment in infrastructure. In more recent policy, that contribution is being revised by reference to a 30 year period of infrastructure need, rather than the previously, widely accepted, 10 year period (which corresponds with long term plans). There's no discounting for the time value of money or apparent consideration of cross generational subsidisation, so council keep increasing the cost of development, which will inevitably be paid for by the customer, a future ratepayer.

Those developing the trunk infrastructure, so say the development community, would be better to purchase or requisition the corridors required now (by using their Public Works Act and other powers). Failure to do so early means by the time they do purchase the necessary land the price of that land has increased significantly, increasing the overall cost of infrastructure delivery and reducing the ability to extract value from any pre-purchased corridor.

Apparent anti-growth agenda further exacerbates housing unaffordability

The NPS-UD is intended to deliver greater land supply and support housing affordability. Reduced areas for housing development (by the apparent exclusion of most greenfield development) reduce levels of competition. Scarcity in offering only operates to push house prices up.

"U-turn" on Auckland Unitary Plan positions undermines business confidence in region

The reversal of areas previously identified for development is unfair. It has the potential to reduce the willingness of private sector players to invest in land and development proposals in the region if they cannot have confidence that areas signalled as being available for development remain available. Significant time and energy was spend engaging with the Auckland Unitary Plan (AUP) and that appears now to have been cast aside.

How to best accommodate Auckland's urban growth was considered at length by the independent hearings panel 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 Panel 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 Panel said:
"...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."

The IHP concluded that it was important to provide multiple ways of accommodating growth, in both brownfield and greenfield areas, to ensure that sufficient development capacity is delivered

Wasted investment in Infrastructure developed for FUZ

Significant funds have been invested in infrastructure upgrades to serve FUZ land. These assets will not be fully utilised if the greenfield land which they were initially intended to service can no longer be developed to the extent initially anticipated.

"Stop/start" nature of FDS belies the way market operates

A continuous flow of work is required for good operation and health of the sector. Development capacity is not like a tap that can be turned off and turned on again at will.

Delayed developments risk loss of construction and supply chain

The product and services providers who work in development do not always have alternative work to tide them over to some future point in time when development opportunities restart. There is a very real risk of further reduced capacity and, given existing distress in the market, also some risk of the dissolution of organisations faced by solvency considerations. This is exacerbated where providers have secured borrowings with security over personal assets. Trading while insolvent considerations will be front of mind for many in this current environment.

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Greenfield makes valuable contributions

It is critical that the option of well planned greenfield development remains alongside brownfield so there is sufficient residential capacity to meet demand and to support the competition that results in better housing affordability. It also preserves choice for residents.

Greenfield development also offers the opportunity to support infrastructure development. Greenfield developments are typically comprehensively master planned and tends to 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 principles into an existing urban area.

Blanket expansion of the rural urban boundary can lead to poor outcomes, but with the right planning, managed expansion can deliver high quality integrated outcomes (infrastructure and housing) at more affordable price points.

Greenfield certainly has an ongoing role to play alongside brownfield.

Conclusion

As noted above, our view is that Council should withdraw the FDS and restart the process.

As part of that process:

- An HBA for business land is required.
- An HBA for residential land meeting all the mandatory requirements must be operative before a revised FDS is shared.
- The plan-enabled capacity cannot be properly determined until natural hazard work currently being undertaken is complete.
- The revised FDS must provide for a competitiveness margin in its residential and business capacity figures.

A meaningful consultation period is also required.

We are happy to assist Council in facilitating access to our membership to inform any future process or in working to improve the existing draft FDS.



UDINZ

creating urban communities together

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Future Development Plan 2023 #8300

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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

1. I am concerned about the way in which consultation on the FDS has occurred and the failure to follow the methodology set out in the NPS

2 the NPS-UD requires that the Auckland Council develop a Housing and Business Development Capacity Assessment (HBA). The HBA must quantify the development capacity that is sufficient to meet expected demand for housing and business land in the short, medium and long term. No HBA has been completed for business land. The HBA for residential land is incomplete. A revised version meeting all the mandatory requirements will not be published until after the consultation period on the FDS is over

3 In order to prepare the draft FDS, local authorities must engage with the development sector to identify significant future development opportunities and infrastructure requirements. It is understood that Auckland Council met only with the Property Council and Kainga Ora and that it surveyed developers with 30 responses received. Many important groups and organisations have not been consulted.

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

1. While local centres are an obvious choice for development given their amenity and

public transport connections the cost and complexity of developing these brownfields sites

is expensive and most often prohibitive.

2 The land is already develvoped so the acquisition price is high.

3 Demolition cost have to be added to the development costs

4 Construction is difficult and disruptive to the neighbours

5 They are also complex developments with a limited number of developers / builders

able to undertake these

6 Infrastructure upgrade costs are also usually unfairly dumped on developers to upgarde the area not just the development site (particularly true for Watercare)

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

1 Developing on land that is exposed to a significant risk environmental risk is illogical for

all parties involved in the development and for future stakeholders

2 The question is who decides what is an environmental hazard and what land will be

affected? The recent 2023 floods in Auckland show how complex this issue is

3 My concern is the way this control could be applied to land that is perfectly fine to

develop but Council apply this condition to limit growth in areas that are not part of the FDS

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 #8301

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

The above assumptions are not based on factual evidence. Evidence indicates that greenfield land is less costly to develop and can be more efficient in terms of responding to the effects of climate change; providing for a well-functioning urban environment; delivering the required infrastructure and providing choices for where and how people live and work.
Given the existing infrastructure and community facilities, it is an efficient and compact outcome to retain the Warkworth South-East land as Future Urban. This will provide the required degree of certainty and facilitate opportunities for land development to deliver land for employment and housing as required to respond to growth demands in Warkworth.

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

As set out above the land is in close proximity to infrastructure, a local centre, the Town Centre, schools and other education facilities and employment options. In any event, proximity to workplaces, services, facilities and shops are maters that are typically addressed in detail in plan changes and alone are not reason to remove Future Urban zoning from the land. There is already a clear policy framework in the Unitary Plan and the NPS UD that requires these aspects to be thoroughly considered in any proposed re-zoning.

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

Warkworth South-East is not constrained by environmental hazards – there is no significant natural hazard risk. Greenfields development often responds better, and the response is more efficient, in terms of managing potential hazards such as flooding. In any event, as addressed above, the existing policy and legal framework requires hazard risk to be fully assessed through any proposed plan change process.

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

Such outcomes will be achieved via land rezoning in the current policy and legal context. The draft FDS removes the certainty that the Future Urban zone was supposed to provide to landowners and the agencies responsible for delivering infrastructure. The draft FDS creates uncertainty that will mean there is less likelihood of quality urban outcomes being achieved.

Other feedback

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

There is no factual or evidential basis to support the approach set out in the draft FDS. The draft FDS will create uncertainty and reduce opportunities to create well-functioning urban environments that will have longevity in terms of quality now and into the future.

The Future Urban zoned land at Warkworth South-East is well placed to deliver a range of housing options in the future. It is close to infrastructure, a local centre, employment options and education facilities.

WNF seeks that the Future Urban zoning be retained at Warkworth South-East.

WNF wishes to be heard in support of its submission and requests hearings be held to facilitate this outcome.

27 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

Submitter Details

This feedback is provided on behalf of:	Warkworth Natural Farm Limited ("**WNF**")
Property or Interest Affected by the FDS:	All the Future Urban zone labelled Warkworth South-East, and specifically the land owned by Warkworth Natural Farm Limited.

Address for Service

Name: The Planning Collective
Attention: Burnette O'Connor

Email Address: Burnette@thepc.co.nz

Phone: [redacted]

Submission Details

The submitter has a particular interest in the land at McKinney Road Warkworth identified on the snip on the following page:

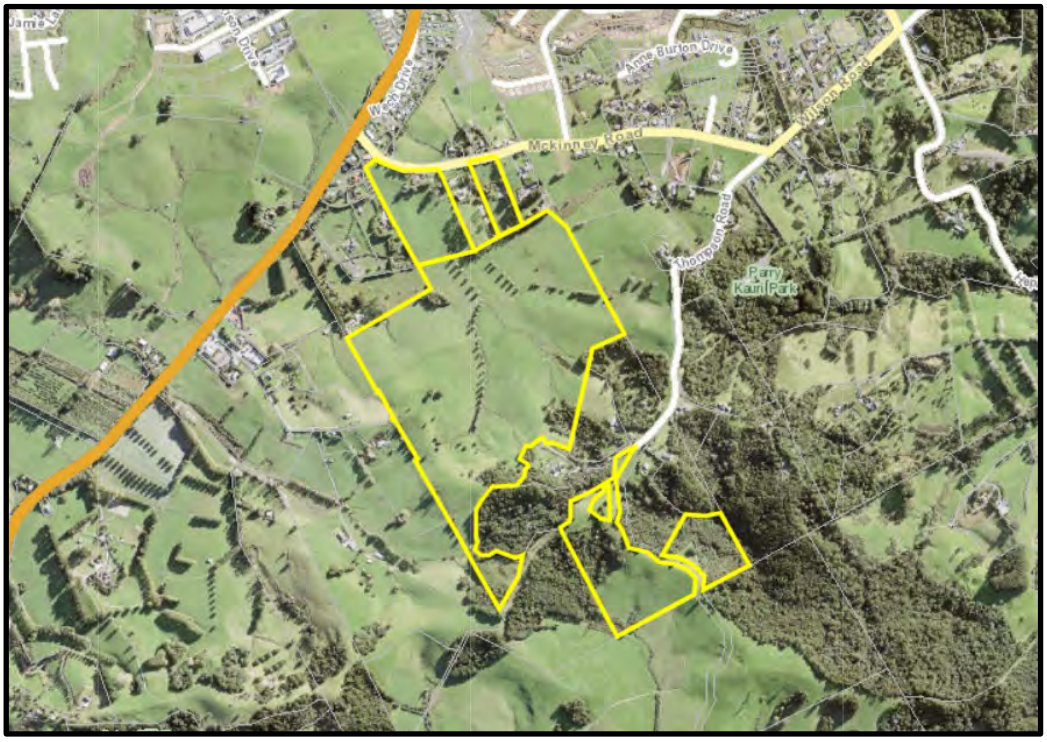


Figure 1 – Land Owned by Warkworth Natural Farm Limited

Most of the land owned by WNF is within the Future Urban Zone. The land has legal frontage to McKinney Road, Warkworth. All of the land to the north of McKinney Road that was zoned Future Urban is now either rezoned to an urban zone or is subject to resource consent for urban development and construction has commenced, meaning the granted resource consents are being implemented.

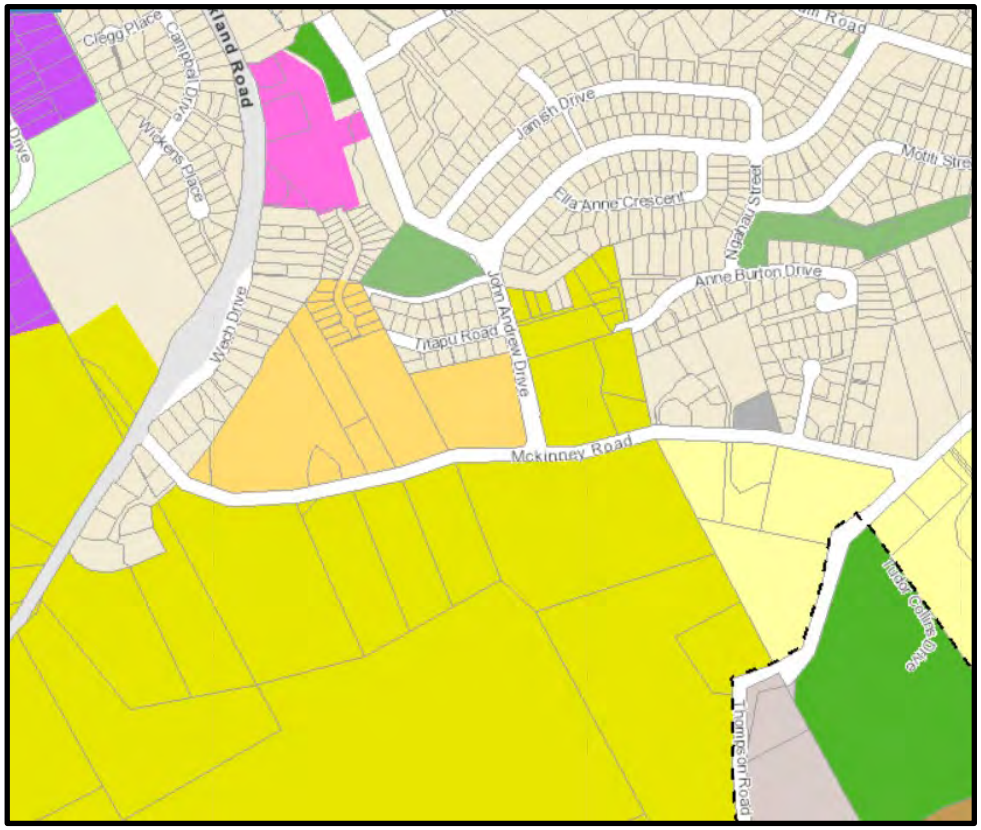


Figure 2 – Unitary Plan Map – Zoning of Land North of McKinney Road, Warkworth

Generic Feedback

The National Policy Statement – Urban Development 2020 (updated May 2022) ("NPS-UD") requires every Tier 1 and 2 Local Authority to prepare a Future Development Strategy ("FDS"). Subpart 4 of the NPS-UD states that an FDS must be prepared and made publicly available *"…every 6 years and in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority".*

The FDS has to apply, as a minimum, to the urban environments of Tier 1 and 2 Local Authorities and can apply to a wider area.

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:

(a) to promote long-term strategic planning by setting out how a local authority intends to:

(i) achieve well-functioning urban environments in its existing and future urban areas; and

(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) 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.

(3) Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.

Clause 3.14 states the FDS must be informed by:

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

(b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS

(c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans

(d) Māori, and in particular tangata whenua, values and aspirations for urban development

(e) feedback received through the consultation and engagement required by clause 3.15
(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement
(g) any other relevant national policy required by, or issued under, legislation.

Clause 3.27 states that the effect of the FDS requires every local authority to have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

Consultation and Engagement:

Clause 3.15 (2) and Clause 3.16 of the FDS states that when prepare the draft using the Special Consultative Procedure in s83 of the Local Government Act 2002, or when undertaking a review of the FDS the local authority must engage with the development sector to identify significant future development opportunities and infrastructure requirements. The requirements for a review of the FDS, Clause 3.16 (2) requires that the review must also include engagement with landowners.

Given the above Auckland Council must take into account feedback provided by land developers and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS.

The Purpose of the FDS is set out above namely to achieve well-functioning urban environments in existing and future urban areas now and over the long-term.

Well-Functioning Urban Environment:

Well-functioning urban environment has the meaning set out in Policy 1 of the NPS-UD:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and
(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

Site Specific Feedback

The draft FDS shows the Warkworth South-East area as area *Recommended for Further Investigation* the following reasons:

1. Infrastructure – specifically no rapid transit network planned, and so the area would not contribute to VKT reduction. This is related to the distance from the existing urban area.
2. Urban Form – This relates to the provision of business land and further understanding being required of the role of Warkworth as a Rural Node.
3. Emissions / VKT reduction.

This submission demonstrates that these reasons are flawed and unsubstantiated for the following reasons:

- Infrastructure: The land directly adjoins the existing urban area and fronts McKinney Road. In real terms the land is in relatively close proximity to the town centre and in close proximity to the Grange, an established retail area. There are reticulated services in place to the north and south of McKinney Road as shown below:

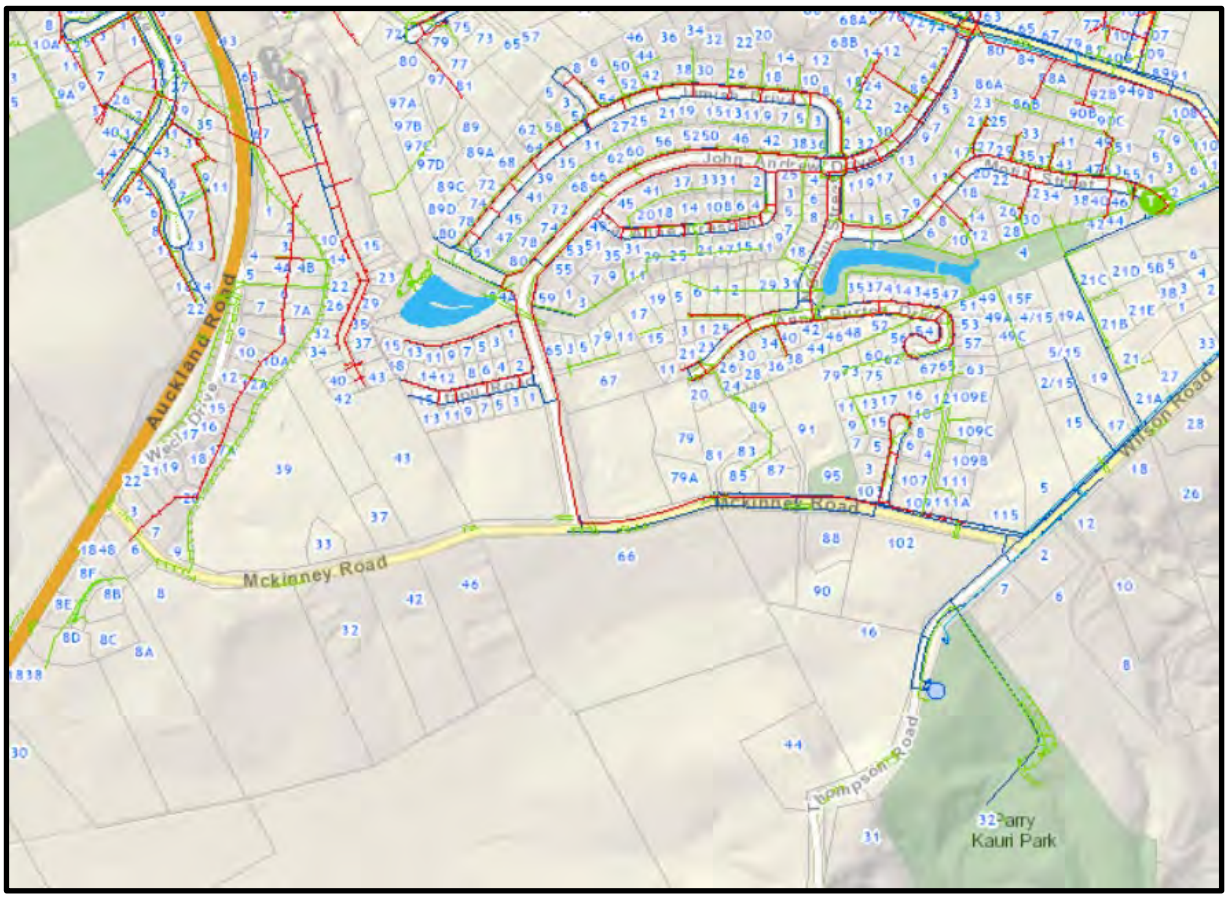


Figure 3 – Auckland Council Geomaps – Reticulated Services – Council Assets

- Urban Form: The land can directly access McKinney Road. There is development occurring along McKinney Road that has resulted in road upgrades including footpaths and the soon to be

completed John Andrew Drive connection. There is good connectivity provided through the established residential area in McKinney Valley.

- Emissions / VKT reduction: For the reasons stated above this area is suitable for development. It is in close to employment nodes in the industrial area on Woodcocks Road and the Grange. There is also reasonably direct access to the town centre through the McKinney Valley.

  The land is close to education establishments including early childhood learning centres, Mahurangi College and the tertiary opportunities provided through Manukau Institute of Technology campus facilities in Woodcocks Road.

  The land is well placed to provide opportunities to reduce vehicle kilometres travelled.

Specific Feedback in Response to Have Your Say

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.

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

The above assumptions are not based on factual evidence. Evidence indicates that greenfield land is less costly to develop and can be more efficient in terms of responding to the effects of climate change; providing for a well-functioning urban environment; delivering the required infrastructure and providing choices for where and how people live and work.

Given the existing infrastructure and community facilities, it is an efficient and compact outcome to retain the Warkworth South-East land as Future Urban. This will provide the required degree of certainty and facilitate opportunities for land development to deliver land for employment and housing as required to respond to growth demands in Warkworth.

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.

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

As set out above the land is in close proximity to infrastructure, a local centre, the Town Centre, schools and other education facilities and employment options. In any event, proximity to workplaces, services, facilities and shops are matters that are typically addressed in detail in plan changes and alone are not reason to remove Future Urban zoning from the land. There is already a clear policy framework in the Unitary Plan and the NPS UD that requires these aspects to be thoroughly considered in any proposed re-zoning.

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.

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

Warkworth South-East is not constrained by environmental hazards – there is no significant natural hazard risk. Greenfields development often responds better, and the response is more efficient, in terms of managing potential hazards such as flooding. In any event, as addressed above, the existing policy and legal framework requires hazard risk to be fully assessed through any proposed plan change process.

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.

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

Such outcomes will be achieved via land rezoning in the current policy and legal context. The draft FDS removes the certainty that the Future Urban zone was supposed to provide to landowners and the agencies responsible for delivering infrastructure. The draft FDS creates uncertainty that will mean there is less likelihood of quality urban outcomes being achieved.

Conclusions and Outcomes Sought

There is no factual or evidential basis to support the approach set out in the draft FDS. The draft FDS will create uncertainty and reduce opportunities to create well-functioning urban environments that will have longevity in terms of quality now and into the future.

The Future Urban zoned land at Warkworth South-East is well placed to deliver a range of housing options in the future. It is close to infrastructure, a local centre, employment options and education facilities.

WNF seeks that the Future Urban zoning be retained at Warkworth South-East.

WNF wishes to be heard in support of its submission and requests hearings be held to facilitate this outcome.

Yours sincerely



Burnette O'Connor
The Planning Collective Limited
[redacted]
Email: burnette@thepc.co.nz

Future Development Plan 2023 #8302

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

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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?

Tell us why

The FDS promotes infill housing as a solution to our current housing shortage. However, there is a high level of uncertainty regarding Plan Change 78 and related plan changes, and there are significant infrastructure issues, namely internal financial constraints within Council, that need to be resolved to provide for further growth in existing urban areas. These shortfalls related to intensifying existing urban areas must be compared to the cost and efficiencies of developing greenfield land, as in many cases, developing greenfield sites result in beter outcomes for urban form, connectivity, safety, lifestyle options, climate change resilience and natural hazard mitigation.
In any event the subject land is in close proximity to the Town Centre and has resource consent for urban development. This needs to be recognized in the FDS.

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
Development can simultaneously occur in existing urban areas near local centres and occur on greenfield sites providing for high quality living opportunities on the urban fringe. A balance is required. Re-development of existing urban areas is often less efficient than greenfields development.

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
Natural hazards should be avoided, or appropriately mitigated. There are often opportunities to avoid or mitigate existing hazards through design and the detailed assessment of the structure planning and plan change process for urban development on greenfields land.

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
This is a sound premise for obtaining quality urban outcomes and well-functioning urban environments. This is already required by the existing planning framework.

Other feedback

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

The Kilns Limited seeks that the FDS is amended to identify the land at 34 and 36 Sandspit Road, Warkworth as “Resource Consent Area.” It is sought that the relevant maps are updated, including any mention of this particular land area within the draft document.

The Kilns Limited wishes to be heard in support of their submission and seeks that hearings in front of independent hearing commissioners be held given the strategic importance of the FDS to current and future planning processes.

27 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

This Feedback details the submitter, the affected properties and responds to the provisions of the FDS in generic and specific ways including addressing the matters that Auckland Council has invited specific feedback on the Have Your Say webpage.

Submitter Details

This feedback is provided on behalf of: The Kilns Limited (the submitter)

Property or Interest Affected by the FDS: [redacted]

Address for Service

Name: The Planning Collective
Attention: Burnette O'Connor

Email Address: Burnette@thepc.co.nz

Phone: [redacted]

Property Details

The submitter has a particular interest in the land at [redacted]. Combined, these lots equate to approximately 2.9ha in area.

The sites are zoned Future Urban and are subject to the following overlays:

- Natural Resources: Significant Ecological Areas Overlay - SEA_T_6684, Terrestrial
- Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Mahurangi Waitemata

- Natural Heritage: Outstanding Natural Landscapes Overlay [rcp/dp] - Area 43, West Mahurangi Harbour
- Historic Heritage and Special Character: Historic Heritage Overlay Extent of Place [rcp/dp] - 569, Combes/Daldy lime works site R09_2240, 0, 0

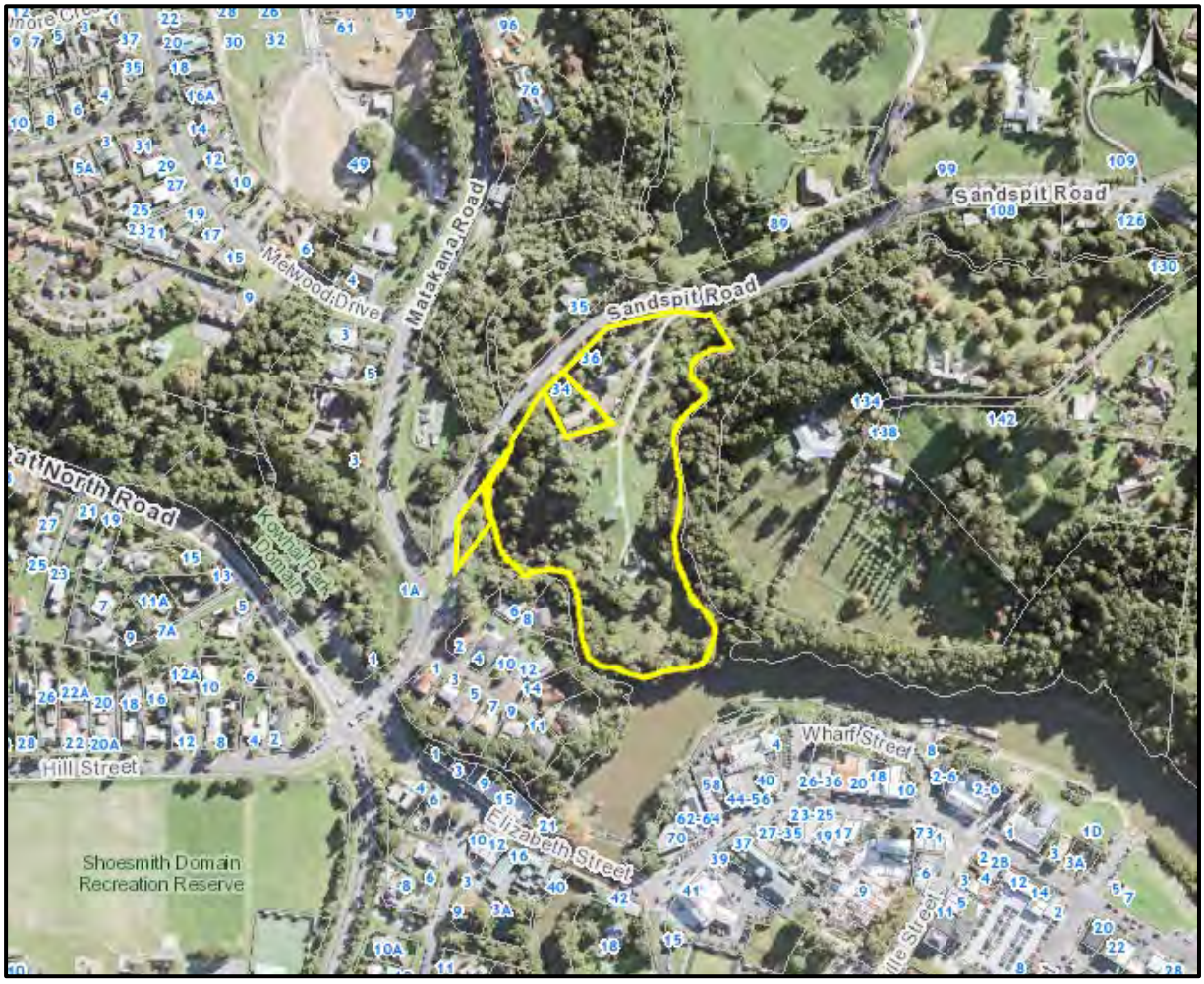


Figure 1: Aerial image of subject site (Source: Auckland Council GeoMaps)

On 26 May 2023, the submitter obtained resource consent to develop the land and construct 49 new dwellings with associated earthworks, impervious surfaces, and servicing. The resource consent application number is BUN60400973 (LUC60400974, DIS60400975, SUB60400976 and WAT60402764).

The site is located within easy walking distance of Warkworth Town Centre and adjoins the Mahurangi River at the site's most southern point and Viponds Creek to the west. The consented development provides for a range of housing options (13 3-storey terraced dwellings, 10 2-storey duplexes, 4 2-storey standalone dwellings, 15 2-storey terraced dwellings, 6 1-storey duplexes an a single 1-storey standalone dwelling). The development vests Esplanade Reverse and Local Purpose Reserve, and provides public access via a gravel pathway to the Lime Works Kiln (historic heritage site) adjacent to the river. A second connection is to be provided via a shared pathway and bridge from the southern side of Sandspit Road through to an existing pathway on Millstream Place. The consented development not only provides greater access to green spaces and heritage spaces in Warkworth, but facilitates pedestrian/cycle connection between the rural and urban areas currently dominated by vehicular transport connection.

In terms of Plan Change 78: Intensification, a submission was made requesting that the site be rezoned from Future Urban to Residential – Mixed Housing Urban. The subject site is currently excluded from PC78 and was sought to be included via the submission. The Hearings Panel has advised that such submissions are 'within scope' of the Plan Change.

A private plan change request has also been lodged but is currently on hold pending the outcome of Plan Change 78.



Figure 2: Artist impression of completed development BUN60400973 (Source: PENZL)

Generic Feedback

The National Policy Statement – Urban Development 2020 (updated May 2022) ("NPS-UD") requires every Tier 1 and 2 Local Authority to prepare a Future Development Strategy ("FDS"). Subpart 4 of the NPS-UD states that an FDS must be prepared and made publicly available *"…every 6 years and in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority".*

The FDS has to apply, as a minimum, to the urban environments of Tier 1 and 2 Local Authorities and can apply to a wider area.

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

> *(1) The purpose of the FDS is:*
>
> *(a) to promote long-term strategic planning by setting out how a local authority intends to:*
>
> *(i) achieve well-functioning urban environments in its existing and future urban areas; and*
>
> *(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and*

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) 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.

(3) Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.

Clause 3.14 states the FDS must be informed by:

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

(b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS

(c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans

(d) Māori, and in particular tangata whenua, values and aspirations for urban development

(e) feedback received through the consultation and engagement required by clause 3.15

(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement

(g) any other relevant national policy required by, or issued under, legislation.

Clause 3.27 states that the effect of the FDS requires every local authority to have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

Given that resource consent has been granted for development of the site and has a 10-year lapse date, the land should be identified in the FDS as "Resource Consent Area" in the same way the consented development at Upper Ōrewa is identified.

Consultation and Engagement:

Clause 3.15 (2) and Clause 3.16 of the FDS states that when prepare the draft using the Special Consultative Procedure in s83 of the Local Government Act 2002, or when undertaking a review of the FDS the local authority must engage with the development sector to identify significant future development opportunities and infrastructure requirements. The requirements for a review of the FDS, Clause 3.16 (2) requires that the review must also include engagement with landowners.

Given the above Auckland Council must take into account feedback provided by land developers and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS.

The Purpose of the FDS is set out above namely to achieve well-functioning urban environments in existing and future urban areas now and over the long-term.

Well-Functioning Urban Environment:

Well-functioning urban environment has the meaning set out in Policy 1 of the NPS-UD:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and
(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

The FDS proposes to include the land in the area identified as Warkworth North. The land was in the area identified as Warkworth North-East in the Future Urban Land Supply Strategy 2017 ("FULSS"). Warkworth North-East was scheduled to be *development ready* in the second half of the second decade – 2033 – 2037. The draft FDS proposes the remaining un-zoned areas of Warkworth North will be *development ready* in 2035+. Given the proximity to the Warkworth Town Centre and the granted resource consent with a lapse period of 10-years, the subject land should be identified as Resource Consent Area.



Figure 3: Subject site classified as Warkworth North East in FULSS (shown by red marker)
(Source: Auckland Future Urban Land Supply Strategy, pg.6)

Site Specific Feedback

The FDS proposes the land be incorporated into the Warkworth North area. This is supported.

The FDS states, *the future development strategy reassessed all future urban areas (FUAs) that had not been live zoned (as at 2023).* As of 26 May 2023, the land at [redacted] can be developed in accordance with BUN60400973. The submitter has resource consent to develop the land ahead of the projected live-zoning of the area. It is requested that the landbe identified as Resource Consent Area, consistent with Upper Ōrewa.

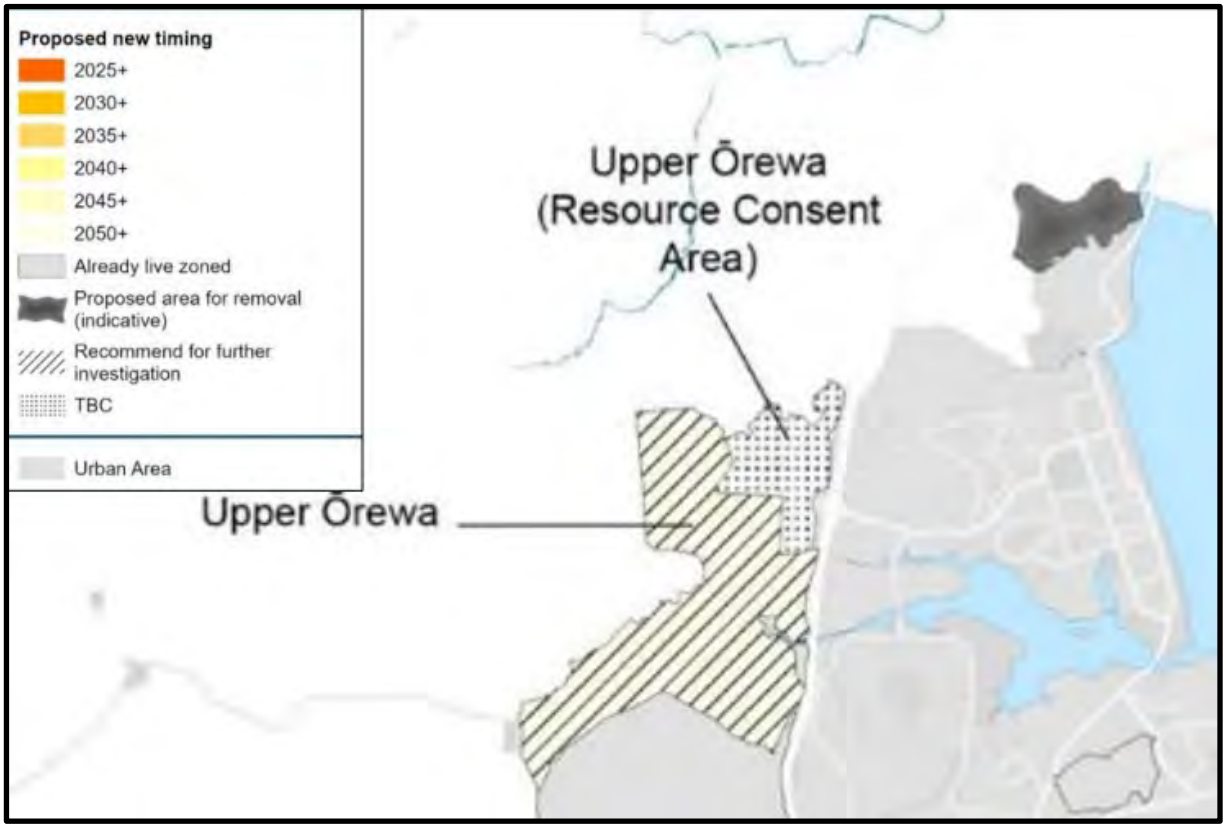


Figure 4: Example of "Resource Consent Area" applied to Upper Ōrewa
(Source: Draft FDS, Appendix 8, Appendix Pg. 43)

Specific Feedback in Response to Have Your Say

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.

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

The FDS promotes infill housing as a solution to our current housing shortage. However, there is a high level of uncertainty regarding Plan Change 78 and related plan changes, and there are significant infrastructure issues, namely internal financial constraints within Council, that need to be resolved to provide for further growth in existing urban areas. These shortfalls related to intensifying existing urban areas must be compared to the cost and efficiencies of developing greenfield land, as in many cases, developing greenfield sites result in better outcomes for urban form, connectivity, safety, lifestyle options, climate change resilience and natural hazard mitigation.

In any event the subject land is in close proximity to the Town Centre and has resource consent for urban development. This needs to be recognized in the FDS.

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.

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

Development can simultaneously occur in existing urban areas near local centres and occur on greenfield sites providing for high quality living opportunities on the urban fringe. A balance is required. Re-development of existing urban areas is often less efficient than greenfields development.

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.

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

Natural hazards should be avoided, or appropriately mitigated. There are often opportunities to avoid or mitigate existing hazards through design and the detailed assessment of the structure planning and plan change process for urban development on greenfields land.

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.

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

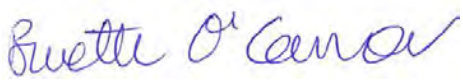
This is a sound premise for obtaining quality urban outcomes and well-functioning urban environments. This is already required by the existing planning framework.

Conclusions and Outcomes Sought

The Kilns Limited seeks that the FDS is amended to identify the land at [redacted] as "Resource Consent Area." It is sought that the relevant maps are updated, including any mention of this particular land area within the draft document.

The Kilns Limited wishes to be heard in support of their submission and seeks that hearings in front of independent hearing commissioners be held given the strategic importance of the FDS to current and future planning processes.

Yours sincerely



Burnette O'Connor
The Planning Collective Limited
[redacted]
Email: burnette@thepc.co.nz

End of Letter

Future Development Plan 2023 #8303

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please refer to the attachment

26 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

This Feedback details the submitter and responds to the provisions of the FDS in generic and specific ways including addressing the matters that Auckland Council has invited specific feedback on via the Have Your Say webpage.

Submitter Details

This feedback is provided on behalf of Fortland Capital

Address for Service

Name: The Planning Collective
Attention: Burnette O'Connor

Email Address: Burnette@thepc.co.nz

Phone: [redacted]

Generic Feedback

The National Policy Statement – Urban Development 2020 (updated May 2022) ("NPS-UD") requires every Tier 1 and 2 Local Authority to prepare a Future Development Strategy ("FDS"). Subpart 4 of the NPS-UD states that an FDS must be prepared and made publicly available *"…every 6 years and in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority".*

The FDS has to apply, as a minimum, to the urban environments of Tier 1 and 2 Local Authorities and can apply to a wider area.

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:

(a) to promote long-term strategic planning by setting out how a local authority intends to:

(i) achieve well-functioning urban environments in its existing and future urban areas; and

(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) 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.

(3) Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.

Clause 3.14 states the FDS must be informed by:

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

(b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS

(c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans

(d) Māori, and in particular tangata whenua, values and aspirations for urban development

(e) feedback received through the consultation and engagement required by clause 3.15

(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement

(g) any other relevant national policy required by, or issued under, legislation.

Clause 3.17 of the NPS-UD states that every local authority must have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

Consultation and Engagement:

Clause 3.15 (2) and Clause 3.16 of the NPS-UD require that when preparing and reviewing an FDS, local authorities must engage with the development sector to identify significant future development opportunities and infrastructure requirements. Clause 3.16 (2) of the NPS-UD further requires that local authorities must engage with landowners, when reviewing an FDS.

Given the above Auckland Council must take into account feedback provided by land developers and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS.

The Purpose of the FDS is set out above namely to achieve well-functioning urban environments in existing and future urban areas now and over the long-term.

Well-Functioning Urban Environment:

Well-functioning urban environment has the meaning set out in Policy 1 of the NPS-UD:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and
(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

The FDS provides Auckland Council an opportunity to reinforce and refine the existing growth strategy set out in the Unitary Plan, in order to address the existing process delays and underinvestment in growth-supporting infrastructure. Instead, Council is using their current 'financially constrained environment' and 'uncertain future' as reasoning to create further market uncertainty and consequently slow the uptake of development capacity. This is the direct opposite outcome from what is required.

The FDS is also an opportunity to provide a clear strategy for the short-medium term growth (or at least for a 6-year outlook to align with each FDS review) requirements of Auckland and provide a pathway for a more ambitious and opportunistic strategy for the long-term growth. Instead, Council has chosen to set a vague *vision* for the built environment of Tāmaki Makaurau, Auckland, which is [emphasis added]:

> *Auckland's built environment will underpin the development* ***of prosperous, inclusive, and vibrant communities****. Quality development will help to regenerate the environment and deliver our commitments to* ***greenhouse gas emission reduction*** *as we grow and change.*

It is apparent that Council has initiated a crack-down on greenfield developments and a freeze-control to the existing urban form and growth pattern. This has been misinformed by its own manufactured financial constraints, outdated HBA and preference for ad-hoc infill developments which in turn only delivers myopic, piecemeal infrastructure solutions or 'bandages'. This leaves our infrastructure (and its ability to support urban development) in a constant state of deficit/catch-up, rather than being efficiently and effectively "future-proofed" to accommodate long-term growth.

In reality, the uptake of development capacity will mostly be realised by the private sector and not Auckland Council. This has been clearly demonstrated over the last 7-years since the Unitary Plan became operative. Auckland Council has notified one plan change (Whenuapai), which was so defective that it eventually had to be withdrawn. This means the growth demand, will in reality, be met by the actions of developers who will deliver and/or support the majority of prosperous, inclusive, and vibrant communities, and put in the legal mechanisms and physical infrastructure to realise greenhouse gas emission reductions. Developers pay the upfront costs for service networks and now more commonly transmission networks (as a minimum) and pay for development contributions (DC) and infrastructure growth charges (IGC).

It is generally understood that Auckland Council's projects will be funded by ratepayers, DCs and IGC's and in some cases with government funding where there are national or cross-regional benefits. Even given these available financial tools, Council has not taken advantage of the opportunity to be more strategic and ambitious with its long-term infrastructure strategy. Council even considers that the creation of Water Services Entities as part of the Affordable Water Reform 'will create new challenges', as opposed to viewing this as an opportunity to properly plan and provide adequate three-waters infrastructure to accommodate longer-term growth, freed from the current funding constraints. Fortland agrees with the Council's approach of wanting to get "best value for money" from infrastructure investment. However, there should also be a focus on increasing the pool of finances available for infrastructure and gaining access to such finances through all mechanisms that are made available to the Council for that purpose.

Fortland requests that the FDS recognises and reinforces the significant role of future urban areas (for Auckland, the "Future Urban Zone" (FUZ)) make in terms of their ability to deliver affordable urban development and create a variety of housing and living environments as well as integrated employment areas. But at the same time, the FDS needs to recognise it is not realistic for the growth demand to be met and infrastructure issues to be resolved if greenfield development is constrained, at least to the extent proposed in the FDS. The FDS needs to provide a pathway for growth outside the current urban form, where it can deliver better-functioning communities (rural and urban), ecosystems and more resilient interconnecting infrastructure networks. These opportunities are discussed in light of the following issues below, with Fortland's responses being informed by the various professional assessments (economic, planning and legal) it has had undertaken regarding the FDS.

In addition, Fortland requests that the Council hold a specific hearing process for the FDS submissions (not just invite submitters to speak at an upcoming Council meeting), given the importance of the FDS/submissions. Fortland wishes to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.

Specific issues that are contrary to Clause 3.13 of the NPS-UD:

1. The FDS in its current form cannot *promote long-term strategic planning (clause 3.13(a))* because:

   a) The FDS has misconstrued growth in some FUZ areas as 'expansive' urban form and not 'compact', despite this zoning being established through the Unitary Plan process, which has a policy framework that requires a quality compact urban form to be realised. In doing this, Council has not acknowledged (and undermined) the significant role well-planned future urban areas in greenfields and around existing rural settlements can provide to improve functionality and connectivity within and between existing urban environments, and the self-sufficiency of existing remote settlements. The FDS provides a unique opportunity to consider where urban development should most appropriately occur on a region-wide basis, unconstrained by the approach that was taken/future development areas that were identified by legacy Councils, who did not have the luxury of taking a "region-wide" view as we do now. Fortland strongly considers that in order to properly achieve the requirements of the NPS-UD, that opportunity must be properly utilised.

   b) The FDS proceeds on the assumption that the only way of reducing car dependency and vehicle kilometres travelled is to promote intensification and preclude urban expansion. That assumption is incorrect. There is clear evidence that quality greenfield development can be undertaken in a way that minimises residents' needs for private vehicle use. Creating thriving town centres in these areas, with good active mode/public transport networks and high value employment opportunities, means these developments can also support (and therefore reduce the private car dependency of) neighbouring areas that currently do not have such services.

   c) The FDS understates the need to decouple some of Auckland's most vulnerable infrastructure networks to alternative locations and routes to genuinely build resilience into the region's infrastructure network for the long-term. Instead, the Council focuses growth on existing exhausted infrastructure i.e., 'non-built solutions', and prioritises infrastructure projects that achieve a 'least monetary cost' or 'best value for money' outcome, low or zero emissions, circular resource use, with little regard to the consequences and inequities this may have on future generations.

   d) Council references and appears to draw its position on infrastructure investment and costs from the findings of a 2009, Australian based research paper [1], which is outdated and should not be referred to in isolation without comparison with recent research, especially in the Auckland/ New Zealand context. New Zealand's per-capita investment in other ("non-dwelling") buildings and structures over the last 40 years has consistently been below that of Australia and other countries such as Canada, and the US, and generally lower than the UK as well.[2] No other cost and benefit analysis has been undertaken and/or made publicly available to support the FDS's claim that 'additional growth at the fringes of our [Auckland Council's] existing networks is the least cost-effective investment in infrastructure to support growth.' In fact, there is evidence to

[1] Page 19 of FDS, footnote (3) which references: *Trubka R, Newman P, Bilsborough, D, 2009. Assessing the costs of alternative development paths in Australian cities, Curtin University of Technology*.

[2] https://www.infometrics.co.nz/article/2020-06-new-zealand-infrastructure-spending-lags-international-partners. The official definition of the "other buildings and structures" category includes most non-residential buildings, roading, water assets, communications and power assets, and mining elements.

suggest that greenfield development is circa 30% cheaper for housing than infill[3].

2. The FDS in its current form cannot achieve *well-functioning urban environments (clause 3.13(a)(i))* because:

   a) The FDS does not provide for the supply of 'affordable housing', especially when assessing plan-enabled capacity and development capacity. The FDS draws data from an unofficial, unreleased draft Housing and Business Development Capacity Assessment (draft HBA). Because the Draft HBA is unavailable for consideration at the time of submissions, it is unclear why the supply of affordable housing was unaccounted for in the FDS. Regardless, the following findings of the last official HBA of 2021 sets a critical benchmark:

      i. The HBA 2021 does not assess affordable housing based on the region as a whole, rather it is assessed only against a group of lower income households, referred to as 'intermediate households.'[4]

      ii. The HBA 2021 estimates that only 1,740 or 1.8% of the total 97,200 intermediate households are expected to afford a home annually, under the Unitary Plan.

      iii. The HBA 2021 states that 'if the supply of affordable housing (housing priced at $770,000 or less) grows at a rate lower than 4.5 per cent, the mathematical model fails to find a finite solution, that is, the housing unaffordability situation of Auckland becomes permanent'.[5]

      Point (iii) above is a critical measure, which has been dismissed entirely in this FDS. Based on the findings above, there is already insufficient affordable housing, and more concerningly, that housing unaffordability is expected to be a permanent issue facing Auckland.

   b) The FDS draws data from the draft HBA to assess 'commercially feasible' capacity, which is currently unreleased and therefore unavailable for consideration in this submission. Assuming the draft HBA uses the same assessment methodology as the last official HBA 2021, 'commercially feasible' capacity would include both residential and future urban zones.[6] Hence, the following findings of the last official HBA of 2021 sets a critical benchmark:

      i. Under the maximum percentage of profit yield scenario, approximately 840,000 residential dwellings were considered commercially feasible with the average sales price of $1.66 million and terrace housing making up most of the feasible typology.

      ii. Under the minimum priced dwelling scenario, about 1.4 million residential dwellings were considered commercially feasible where the average sales price is $1.04 million, and apartments and terraces make over 84 per cent of the feasible dwellings tested.

      The average sale price in both scenarios would mean that 'commercially feasible' capacity was already unmatched with sufficient affordable housing (housing priced at $770,000 or less at the

[3] Based on analysis of new infill and greenfield dwelling build data in Auckland sourced from CoreLogic.
[4] The intermediate households consist of private renter households and the level of income required to affordably pay the mortgage on a dwelling purchased at the lower quartile dwelling sale price. Required income is $132,300 for a sales price of ($770,000) (Mitchell 2019, 2020) on Page 8 of the HBA 2021.
[5] page 81 of the HBA 2021.
[6] Page 51 of the HBA 2021.

time of HBA 2021). This means the potential uptake of affordable housing development capacity may already be insufficient to meet demand. The removal of future urban zoned land would likely worsen this if taken out of the equation.

c) The FDS has disproportionally focussed future development capacity and infrastructure commitments to existing employment, services, and rapid transit networks. This is at the expense of existing residential, car-dominant suburbs that need more local employment options, services, facilities, and alternative modes of transport that are safe, reliable, and efficient. To meaningfully reduce travel time, emissions and lower household transport costs without reducing the quality of life, the FDS needs to have a region-wide 'easy access-for-all' approach before focussing on 'priority areas'. As noted, this can (usually most effectively) be achieved via greenfield development.

d) In developing the FDS's spatial response, Council has relied on assumptions to evaluate alternative growth pattern scenarios in Part 3. Some of the assumptions/key themes arising from that evaluation have resulted in missed opportunities for appropriate and efficient growth outcomes, such as:

Point 2: *'Reducing vehicle emissions needs to focus on current travel patterns and behaviours, rather than rely on changing growth and development, although the latter can play a significant part in setting Tāmaki Makaurau up for reduced emissions over the longer term.'; and*

Point 6: *"Compact urban forms perform better in terms of 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 most significant costs."*

The government's Hamilton-Auckland Corridor Partnership, Plan and Programme[7] earmarks South Auckland, in particular the area from Papakura to Pokeno to be one of Auckland's and New Zealand's fastest growing areas. All four growth scenarios in the FDS adopts the current singular, linear movement pattern heavily dictated by State Highway 1 in the South. Compact form should be coupled with resilient infrastructure networks; however, the adoption of a 'least monetary cost' approach to aging and already-underinvested infrastructure networks will only prevent investigation and strategic investment in projects that have long-term, inter-generational benefits. An example of this is an alternative SH1 Rapid Transit Network (RTN) corridor from the Auckland Airport (possibly extending Light Rail or the Botany-Airport RTN) to Pukekohe/ Paerata, which can also carry the Waikato 2 Watermain planned connect through to and across the Pahurehure Inlet.

3. The FDS in its current form cannot provide certainty that there is *at least sufficient development capacity for housing and business land, as required by clauses 3.2 and 3.3 (clause 3.13(a)(ii))* because:

a) Council's updated (current) HBA is still in draft.

[7] https://www.hud.govt.nz/assets/Uploads/Documents/Cabinet-paper-Hamilton-Auckland-Corridor-Partnership-Plan-and-Programme.pdf and https://futureproof.org.nz/assets/FutureProof/H2A/Final-H2A-Plan-November-2020.pdf.

b) Plan-enabled dwelling and business land capacity needs to be commercially feasible and infrastructure-ready to be realised. In many cases, small-scale infill developments will become commercially infeasible if the developer must bear the upfront costs of bulk infrastructure upgrades on top of increasing land values and construction costs. Simply such projects will not be of sufficient scale to warrant the costs of the infrastructure upgrades required. Alternatively, large greenfield and regeneration brownfield developments in the right locations can build housing and non-residential building at scale and incorporate forward-thinking urban planning to ease the pressure on strained infrastructure systems and social facilities.

c) Council acknowledges that 'take-up will vary' making it difficult to plan for cost-recovery, ring-fence DC's and budget for future projects. The development capacity should be assessed and presented by location and market (type, size, and price) to address existing sub-regional inequities in the accessibility to and distribution of jobs, alternative modes of transport and community facilities.

d) The "command and control" philosophy that the Council has adopted to date, through the existing Future Land Supply Strategy 2017 (FULSS) has not provided a robust strategy to deliver housing (and associated infrastructure) at the right pace and in the right places. The Council "blames" (and is upset with) the development community/private sector for not following the FULSS, but instead brining private plan changes ahead of the timing indicated in the FULSS. The Council says this "*has removed any degree of certainty in sequencing and timing of growth and has forced the Council group to become more reactive to ever changing priorities – both in timing of development and the number and spread of areas being live zoned*".[8] However, the reality is that the FULSS was set by the Council, without sufficient consultation or understanding of the current market demands around housing. The same mistakes cannot be made with the FDS – so the Council must understand that the market will not simply abide by and adopt the Council's (generally unpragmatic) preferences around urban growth. Rather, the Council and private sector need to work closely and collaboratively, to establish an FDS/strategic plan that actually works for the community it is supposed to serve, by reflecting the community/market's preferences (not just those of the Council).

[8] Page 39 of FDS.

Conclusions and Outcomes Sought

In summary, Fortland requests the following:

- The FDS reinforce and support the significant role of future urban areas, and that Council provides a pathway for growth outside the current urban form, where it can deliver better-functioning communities (rural and urban), ecosystems and more resilient interconnecting infrastructure networks.

- Development capacity be assessed and presented by location and market (type, size, and price) to address existing sub-regional inequities in the accessibility to, and distribution of jobs, alternative modes of transport and community facilities, including parks, reserves and other open space networks.

- To meaningfully reduce travel time, emissions and lower household transport costs without reducing the quality of life, the FDS adopt a region-wide 'easy access-for-all' approach before focusing on 'priority areas.'

- The FDS not be based on a 'least monetary cost' approach and instead, provide a pathway for a more ambitious and opportunistic long-term growth strategy with inter-generational benefits that will provide lasting quality urban environments for generations to come.

- The FDS must consider the supply of 'affordable housing' when assessing plan-enabled capacity and development capacity and include mechanisms to ensure the supply of affordable housing does not grow at a rate lower than 4.5 per cent.

- Auckland Council hold a specific hearing process for the FDS submissions (not just invite submitters to speak at an upcoming Council meeting), given the importance of the FDS/submissions. To reiterate, Fortland wishes to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.

Yours sincerely



Burnette O'Connor
The Planning Collective Limited
Email: burnette@thepc.co.nz
[redacted]

End of Letter

Future Development Plan 2023 #8304

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Your feedback

Focusing growth

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

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

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

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

Tell us why

Infill is not likely to achieve the amount of housing the Council has assessed. There is a high level of uncertainty regarding Plan Change 78 and related plan changes and there are significant infrastructure problems that need to be resolved to provide for further growth in existing urban areas. These factors need to be balanced against the costs and relative efficiencies of developing greenfields land.
Structure Planning has not been undertaken for the existing urban areas to determine how best additional growth could be accommodated. Are there enough parks, community facilities, schools etc. The direction of a primary focus on infill will not achieve well-functioning urban environments.

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
This is a primary requirement for any robust planning process. It is an outcome of good design and solid assessment.

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
Natural hazards should be avoided but there are also opportunities to avoid or mitigate existing hazards through design and the detailed assessment of the structure planning and plan change process.

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
This is a sound and basic premise for quality urban outcomes and well-functioning urban environments.

Other feedback

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

Appleby Road Limited seeks the draft FDS be withdrawn and a new FDS prepared once the HBA that Council is currently working on is completed. Any new FDS should be based on reliable factual robust data.

Appleby Road Limited seeks the FDS is amended from the draft to remove the indicative Proposed Area for Removal. The land should be retained as Future Urban. There has not been detailed analysis undertaken to evaluate all relevant factors that warrant removal of the zone. The land is required for the future urban growth of Auckland.

Appleby Road Limited wishes to speak in support of their submission and seeks that hearings in front of independent hearing commissioners be held given the strategic importance of the FDS to current and future planning processes.

26 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

This Feedback responds to the provisions of the FDS in generic and specific ways including addressing the matters that Auckland Council has invited specific feedback on the Have Your Say webpage.

Submitter Details

This feedback is provided on behalf of:	Appleby Road Limited, the owners of [redacted]
Property or Interest Affected by the FDS:	Future Urban zoned land at Drury, and specifically [redacted]

Address for Service

Name: The Planning Collective
Attention: Burnette O'Connor

Email Address: Burnette@thepc.co.nz

Phone: [redacted]

Spatial Context and Background

The submitter has a particular interest in the land at [redacted]. The property is held in one fee simple title with the legal description of Lot 2 DP 477267 and has an area of approximately 3.7524 hectares.

Zoning and Location:
The land is zoned Future Urban in the Operative Part Auckland Unitary Plan ("AUPOP"), as shown in Figure 1. The identified Future Urban zone in the Unitary Plan was intended to identify the land required

for urban growth over a 30-year timeframe – 2010 through to 2040. The Future Urban zone was to provide certainty to developers, landowners, Council Controlled Organisations and other infrastructure providers. The Zone description in Chapter H18 states:

> *The Future Urban Zone is applied to greenfield land that has been identified as suitable for urbanisation.*

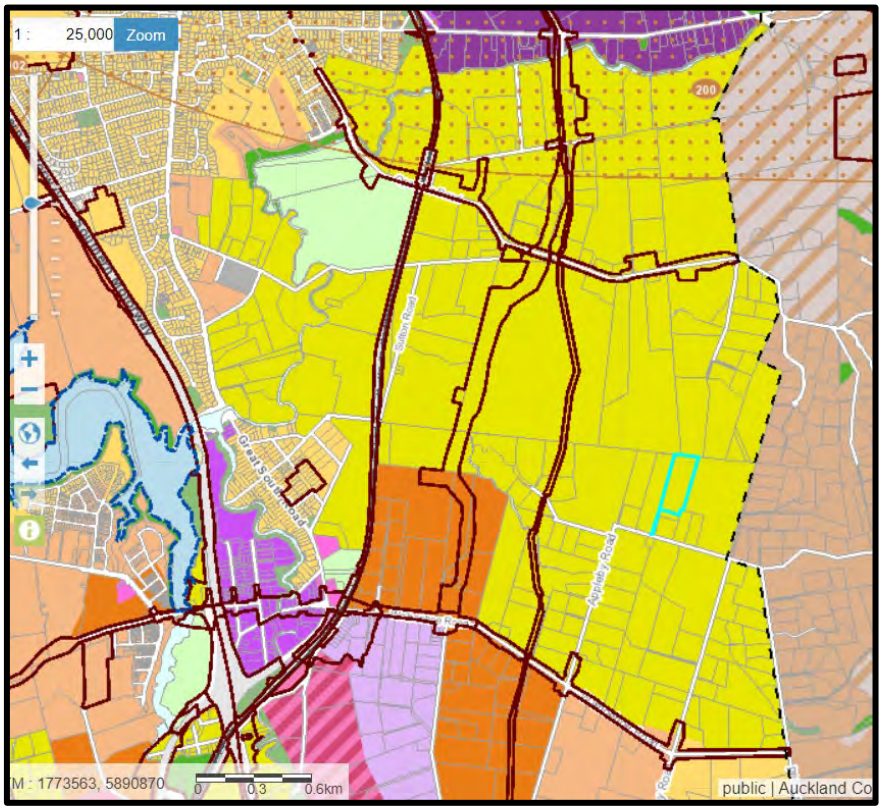


Figure 1 – Zoning and Designations (Source: AUP-OP, 25/07/23)



Figure 2 – Aerial image of subject site (Source: Auckland Council GeoMaps, 21/07/23)

Future Urban Land Supply Strategy 2017:

The Future Urban Land Supply Strategy 2017 identifies the site and surrounding area as being *Development Ready* in the first half of decade 2 – between 2028 and 2032- refer Figure 3 below.

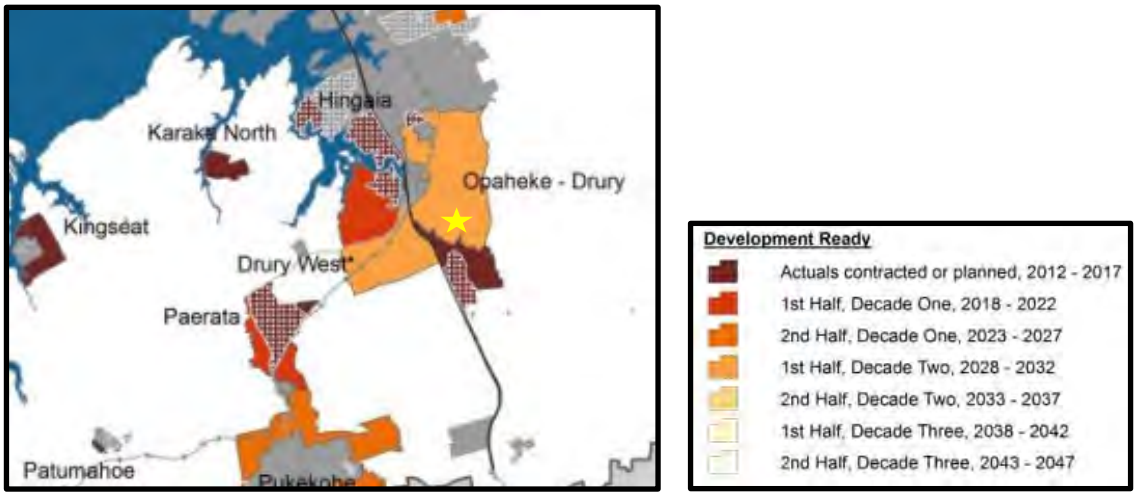


Figure 3 – Zoning of Drury under the Future Urban Land Supply Strategy and associated legend (Source: Auckland Future Urban Land Supply Strategy 2023-2053, July 2017)

The draft Future Development Strategy ("FDS") identifies the site and surrounding area Proposed Area for Removal (indicative) - refer Figure 6 below. The FDS states that areas identified as Proposed Area for Removal will be subject to future plan changes that will seek to zone the land Rural rather than the current Future Urban zone.

Auckland Council Adopted Drury – Opaheke Structure Plan – August 2019:

The land is incorporated in the Auckland Council Drury - Opāheke Structure Plan 2019 as shown in the snip on the following page:

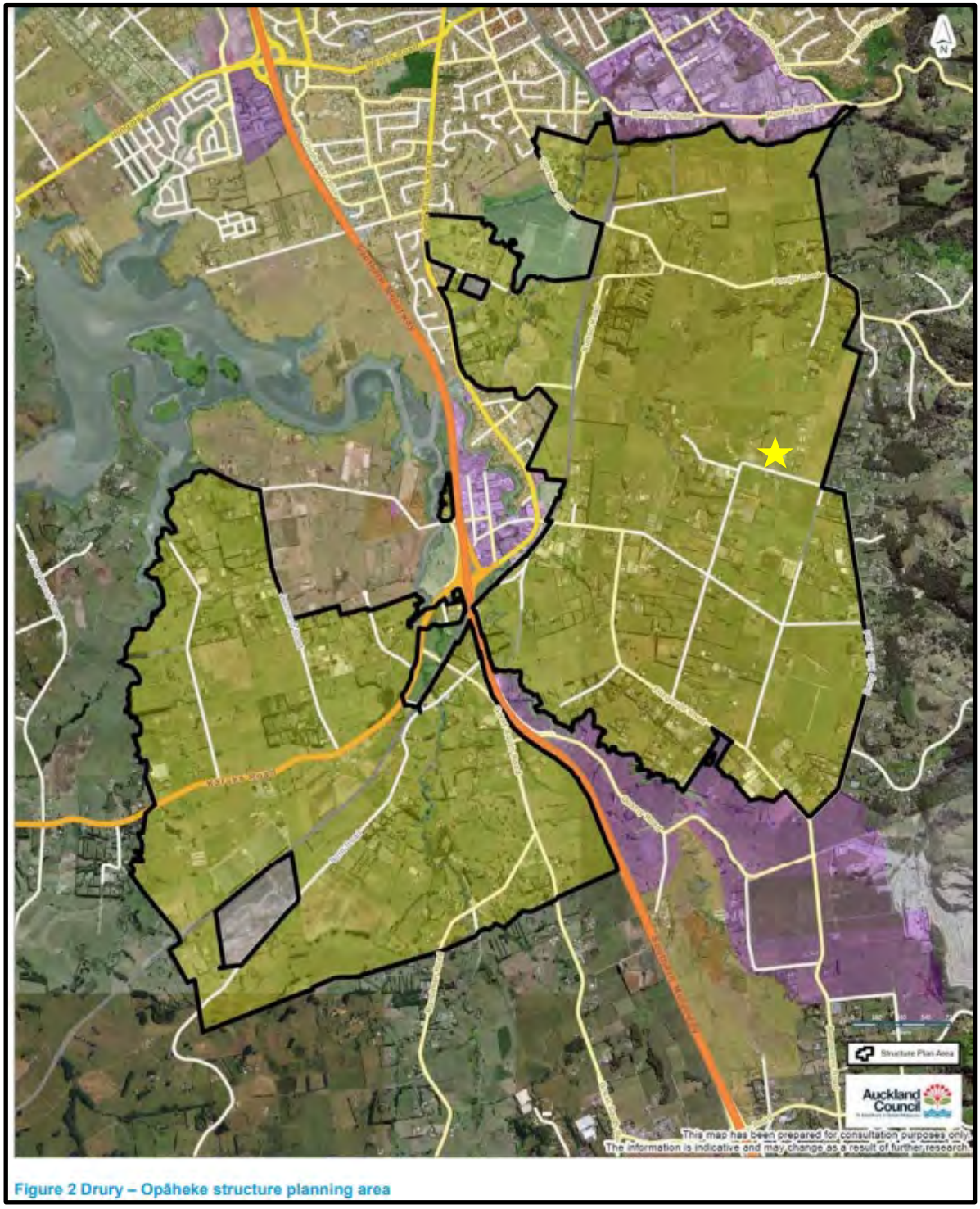


Figure 4 – Drury – Opāheke Structure Plan Area (Source: Auckland Council, August 2019)

The Drury – Opāheke Structure Plan Adopted by Auckland Council in August 2019, identifies the subject site as within the Opāheke portion of the Structure Plan area.

The Land Use pattern in the Adopted Structure Plan identifies the subject land as Residential – Mixed Housing – Suburban – refer Structure Plan Land Use Map Figure 5 below:

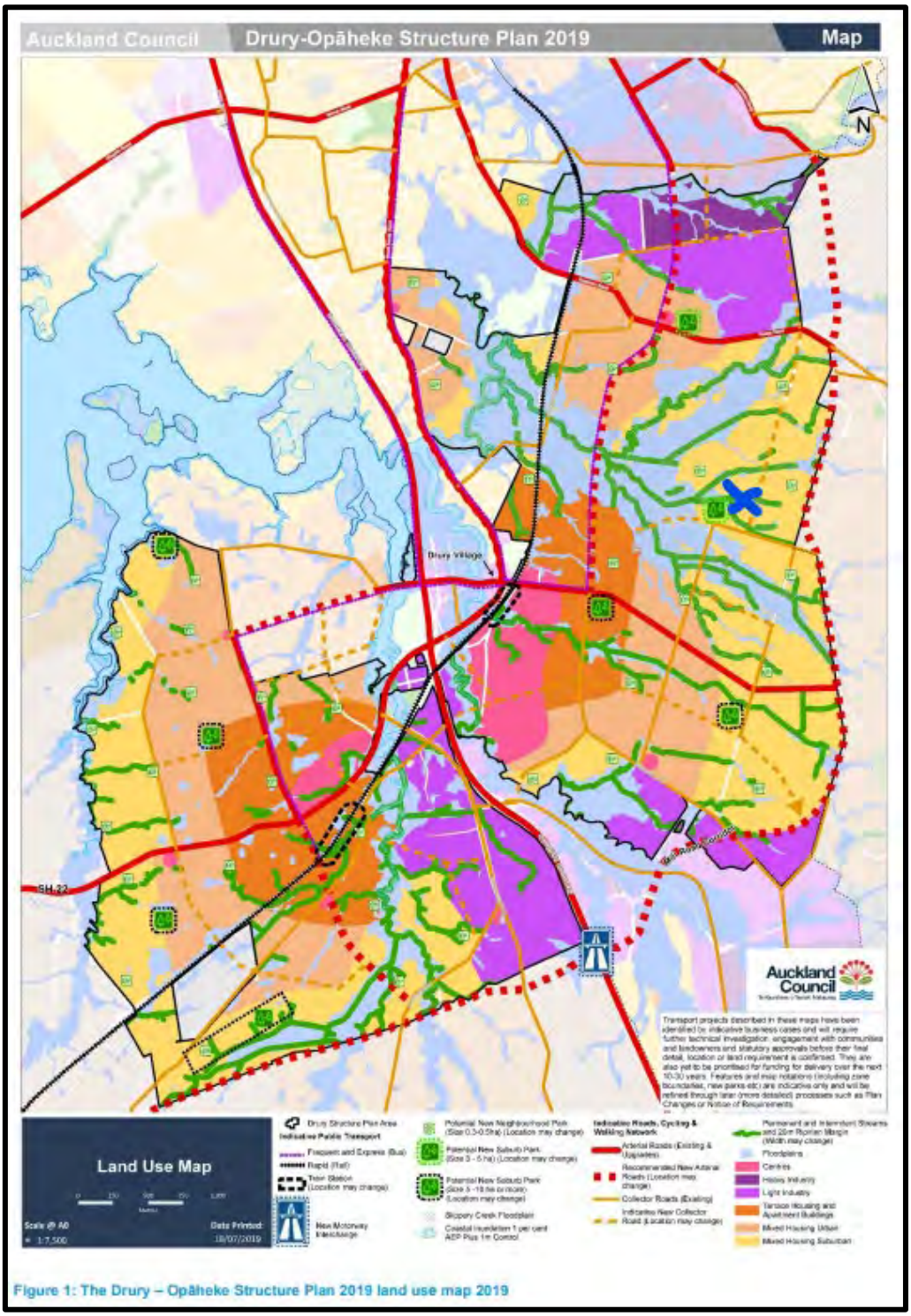


Figure 5 – Drury – Opāheke Structure Plan Adopted Land Use Map (Source: Auckland Council, August 2019)

The Structure Plan states the *development of the Future Urban Zone in Drury – Opāheke is part of the solution for addressing the growth challenge.* The Opaheke area is within the Slippery Creek catchment and the greatest risk has been identified as flood hazard. However, given the structure planning that has occurred, and the detailed stormwater modelling and Stormwater Management Plans prepared for the structure plan exercise and plan changes, there is sufficient land identified to enable urban development and avoid, or suitably mitigate flood hazards. Correctly at Section 3.10.1 of the Structure Plan it states, *Land use zoning within floodplain areas will need to be reviewed as part of future plan change processes.*

The land is north of recent plan changes 48 and 49 that have been approved in the Drury area – see Figure 6 below:

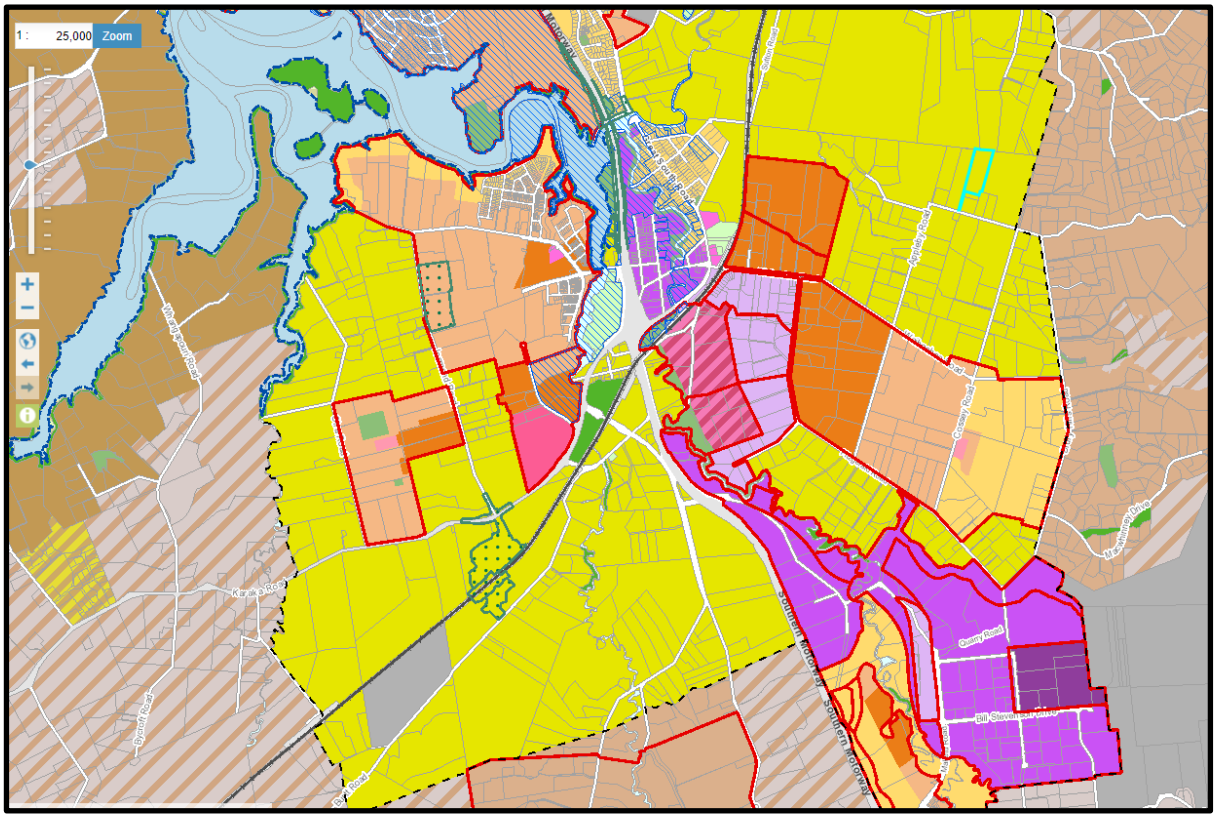


Figure 6 – Zoning of 218 Appleby Road, Drury within the wider area including recent rezoning via Drury plan Changes 48 and 49 (Source: Auckland Unitary Plan Maps, 21/07/23)

Draft FDS 2023:

The draft FDS identifies the land and surrounding area as *Proposed Area for Removal (indicative).*

> *Ōpaheke-Drury*
> *Ōpaheke-Drury is recommended for partial removal (of the area associated with the Slippery Creek flood plain and some land to east adjacent to the floodplain). The remaining parts of the FUA are to be renamed Ōpaheke (north of Slippery Creek) and Drury East (for land not live zoned). The reasons for this partial removal are:*
> - *Significant hazard constraints, including approximately 38% of the FUA covered by the 1% AEP flood plain. Flood plains in the area are wide in extent and deep, posing significant risks to development. There are also isolated pockets of areas subject to high risk slope instability and possible liquefaction damage. The Drury fault line also runs along the eastern boundary of the FUA. Recent studies demonstrate that this fault may be active.*
> - *A portion of the FUA to east of the Slippery Creek floodplain has been included to be removed. Although this area is not subject to the same level of natural hazard constraint, retaining it for development while removing areas of land within Slippery Creek to the north, south and west could result in poor urban form outcomes, result in reverse sensitivity effects, and a reduced ability to service the area with infrastructure.*

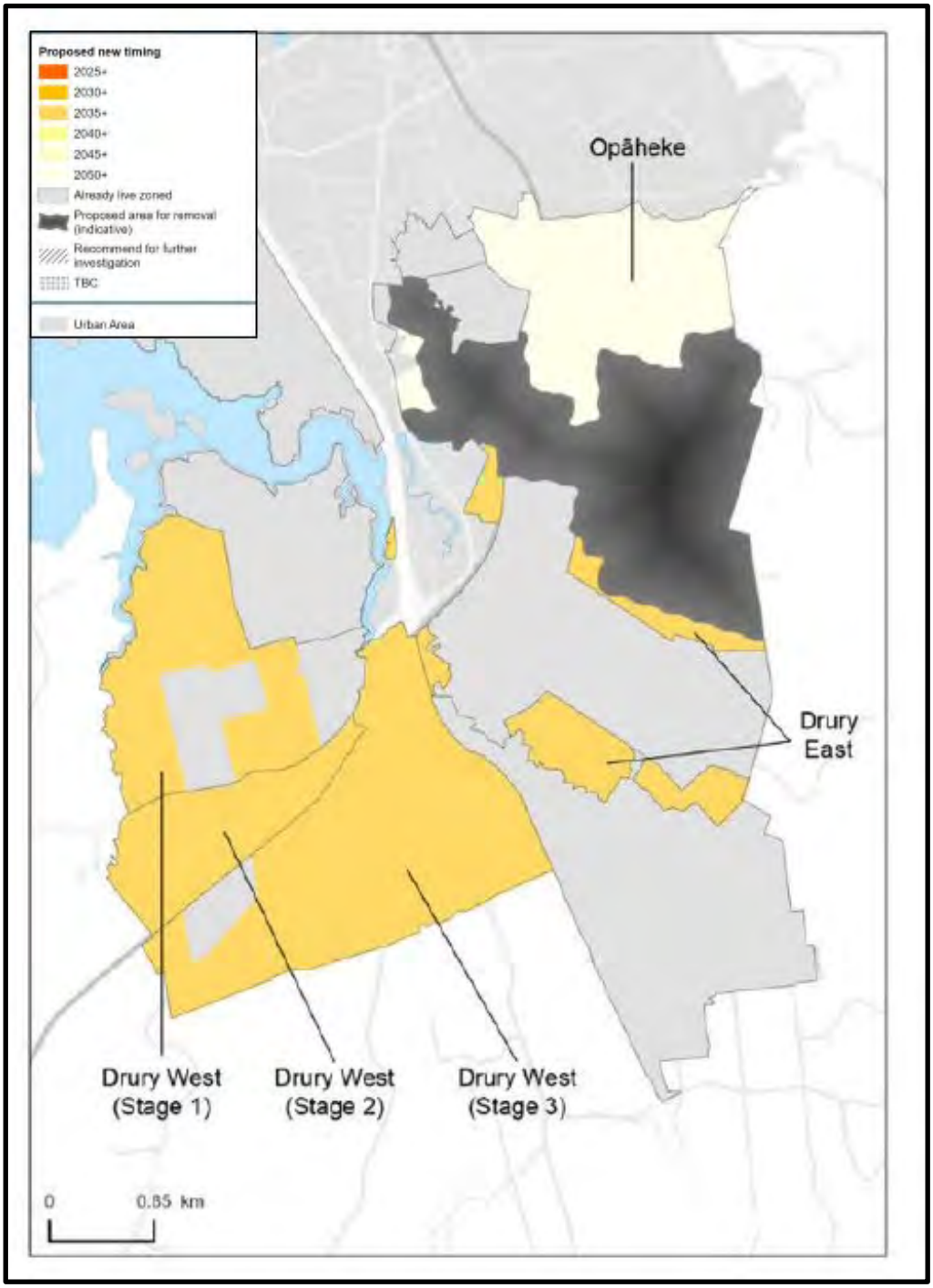


Figure 7 – Proposed timing of Drury under the proposed Future Development Strategy and associated legend (Source: Overview Document Auckland Future Development Strategy 2023-2053, June 2023)

Appleby Road Limited submits that the area of land identified to be removed in the draft FDS will achieve the outcomes stated above that the Council is seeking to avoid, namely *poor urban form outcomes, reverse sensitivity effects, and a reduced ability to service the area with infrastructure.* Appleby Road Limited seeks Auckland Council retain the area as Future Urban to enable certainty and to also enable the resolution of natural hazard risk avoidance and the creation of well-functioning urban environments that can be addressed in a detailed plan change process.

It is acknowledged that any future plan change will need to address natural hazard risk and the effects of climate change. Retaining a larger land area in the Future Urban zone provides greater opportunity for solutions to be realized.

Proposing to remove Future Urban zoning from the land creates a significant degree of uncertainty which is the exact situation the identification of the zone in the first place was seeking to avoid.

The Unitary Plan and the Structure Plan process undertaken by Auckland Council have the framework to address the full range of constraints on urban land development and the tools are available to ensure risks are appropriately managed. There are provisions in the resource Management Act to ensure land subject to significant natural hazards is not developed unless there are suitable conditions / mitigations in place.

Proposing to remove the area of Future urban zoned land at Opāheke is not in keeping with the purpose of the Future Urban zone as stated in s32 reports and analysis for the Unitary Plan, or in fact the Zone description. The FDS should be amended to retain the indications of the land for urban development and the timeframes for this should align with growth demand and infrastructure as required by the National Policy Statement Urban Development 2020 (updated May 2022) ("NPS UD").

Generic Feedback

The NPS UD requires every Tier 1 and 2 Local Authority to prepare a Future Development Strategy ("FDS"). Subpart 4 of the NPS-UD states that an FDS must be prepared and made publicly available *…every 6 years and in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority.*

The FDS must apply, as a minimum, to the urban environments of Tier 1 and 2 Local Authorities and can apply to a wider area. Auckland is a Tier 1 Local Authority.

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:
- *(a) to promote long-term strategic planning by setting out how a local authority intends to:*
  - *(i) achieve well-functioning urban environments in its existing and future urban areas; and*
  - *(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and*
- *(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.*

(2) *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.*

(3) *Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.*

Clause 3.14 states the FDS must be informed by:

(a) *the most recent and applicable Housing and Business Development Capacity Assessment ("HBA"),*
(b) *a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS*
(c) *the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans*
(d) *Māori, and in particular tangata whenua, values and aspirations for urban development*
(e) *feedback received through the consultation and engagement required by clause 3.15*
(f) *every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement*
(g) *any other relevant national policy required by, or issued under, legislation.*

Clause 3.27 states that the effect of the FDS requires every local authority to have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

The FDS is thus a document of primary importance to the future planning for the urban growth of Auckland. It sets the framework for urban growth over the next 30-years and is the benchmark for how Auckland intends to create well-functioning urban environments. The FDS must provide capacity for the anticipated urban growth and set out how this will be achieved in a manner that fulfills Objective 1 and Policy 1 of the National Policy Statement Urban Development ("NPS UD").

If the identified land was required for the growth model that the Unitary Plan relied on, then it must also be required now. There is inherently uncertainty with respect to Plan change 78 and the ability for growth to be accommodated in the existing urban areas. The outcomes of the NPS UD will not be achieved by restricting and constraining the land areas identified as available for urban growth.

It is likely that growth will be delivered by private entities, not Council. This is demonstrated by the fact Auckland Council has prepared one plan change (Plan Change 5) in the time since the Unitary plan became Operative in Part. All other plan changes have been promulgated and delivered by private entities and development on the ground in terms of land development and housing is occurring. The Council plan change was withdrawn, and nothing has occurred.

Consultation and Engagement:

Clause 3.15 (2) and Clause 3.16 of the FDS states that when prepare the draft using the Special Consultative Procedure in s83 of the Local Government Act 2002, or when undertaking a review of the FDS the local authority must engage with the development sector to identify significant future development opportunities and infrastructure requirements. The requirements for a review of the FDS, Clause 3.16 (2) requires that the review must also include engagement with landowners.

Given the above Auckland Council must take into account feedback provided by land developers and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS.

The draft FDS feedback must be taken into account in development of the final FDS. Because this is such a strategic document, submitters should be provided the opportunity to speak in support of their submissions and to attend a hearing in front of independent commissioners.

The Purpose of the FDS is set out above namely to achieve well-functioning urban environments in existing and future urban areas now and over the long-term.

Well-Functioning Urban Environment:

Well-functioning urban environment has the meaning set out in Policy 1 of the NPS-UD:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and
(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

The areas identified as Future Urban in the unitary plan were identified on the basis of constraints knowledge and the framework for structure plans and plan changes in the Unitary Plan require detailed assessment of natural hazard risks and the impacts of climate change. It is not rational, or well thought out, to remove areas currently identified as Future Urban without further detailed analysis being undertaken.

Specific Feedback in Response to Have Your Say

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.

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

Infill is not likely to achieve the amount of housing the Council has assessed. There is a high level of uncertainty regarding Plan Change 78 and related plan changes and there are significant infrastructure problems that need to be resolved to provide for further growth in existing urban areas. These factors need to be balanced against the costs and relative efficiencies of developing greenfields land.

Structure Planning has not been undertaken for the existing urban areas to determine how best additional growth could be accommodated. Are there enough parks, community facilities, schools etc. The direction of a primary focus on infill will not achieve well-functioning urban environments.

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.

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

This is a primary requirement for any robust planning process. It is an outcome of good design and solid assessment.

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.

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

Natural hazards should be avoided but there are also opportunities to avoid or mitigate existing hazards through design and the detailed assessment of the structure planning and plan change process.

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.

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

This is a sound and basic premise for quality urban outcomes and well-functioning urban environments.

Conclusions and Outcomes Sought

Appleby Road Limited seeks the draft FDS be withdrawn and a new FDS prepared once the HBA that Council is currently working on is completed. Any new FDS should be based on reliable factual robust data.

Appleby Road Limited seeks the FDS is amended from the draft to remove the indicative Proposed Area for Removal. The land should be retained as Future Urban. There has not been detailed analysis undertaken to evaluate all relevant factors that warrant removal of the zone. The land is required for the future urban growth of Auckland.

Appleby Road Limited wishes to speak in support of their submission and seeks that hearings in front of independent hearing commissioners be held given the strategic importance of the FDS to current and future planning processes.

Yours sincerely



Burnette O'Connor
The Planning Collective Limited
Email: burnette@thepc.co.nz
[redacted]

Future Development Plan 2023 #8312

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?

Future Development Plan 2023 #8317

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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?

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?

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 #8454

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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?

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?

Future Development Plan 2023 #8465

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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

I live in an urban area (Drury). It is kinda troublesome to have to travel for like 20+ mins just to buy groceries or like milk etc, Honestly it's also a waste of patrol to have to travel for so long just to buy like one item. Plus there should be more places for g. emergency as by the time i travel to the nearest hospital the victim would be long gone.

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

I agree and disagree. I feel like if the housing are near business development area everywhere in Auckland would be crowded. Majority of the people I know ten to like to live in a quieter place. There should be more 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.

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

Because of the cyclone a lot of the people I know has experience a almost near death experience.

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?

Should find a different way to ask for feedback.

Future Development Plan 2023 #8477

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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

Auckland is already packed and so building in the rural areas would allow less congestion in Auckland and more homes in other spaces.

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

As a student, if I lived close by to a library it would encourage me to make more use and study there as it is only a short walk. I would also spend less money on public transport as it is a short walking distance.

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

The floods that occurred earlier this year is a perfect example on why you should not build anywhere where land is available, but also places that are fit to be built on. Inspecting areas would save home owners money.

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 #8530

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

I support the need for a focused intensification in carefully controlled brownfield areas. However, the infrastructure triggered development required to adopt the more intensive scenarios in the FDS will force development to slow down, and Auckland will continue to fall short of its housing needs.

Controlling growth via Infrastructure dependence is a reactive process, and a recipe for pushing a blanket-upzoned Auckland to breaking point. This would destroy many dimensions of liveability for existing residents, and work against council's stated objectives and outcomes.

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 submission

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

- The proposal to mitigate environmental risks by reassessing future development in vulnerable areas is commendable. Nonetheless, focusing solely on avoiding risk areas might be overlooking opportunities for enhancing our environment's resilience, particularly against flooding. With this intensity of rainfall, flooding and slips are a widespread risk for Auckland, with sheeting of water resulting in flooding even when not at the bottom of hills and subject to “rising water”.
- A significant factor contributing to recent flooding events in Kumeu is inadequate planning, maintenance, and upkeep of flood defences and waterways
- the newly developed housing areas proved resilient, showing that the newest water management initiatives are working to protect new housing

Resilient infrastructure

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

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

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

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

Other

Tell us why

Please see attached submission

Other feedback

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

Please see attached submission

#8530

Focusing growth

Auckland's proposed FDS is a regressive step compared to the outgoing Unitary Plan, delivering poor quality outcomes for new and existing residents

[redacted] 27/7/2023

#8530

Summary of position

Despite the oversupply of land available for intensification under NPS-UD and MDRS, Council and Stats NZ data shows that under current infrastructure constraints, it is not feasible for the city to deliver *intensification in a quality compact form.* Infrastructure constraints within the brownfield will prevent new dwellings keeping up with demand.

To take time moving the city toward a Quality Compact form and continue to satisfy demand, infrastructure for the release of future urban areas is needed. I present data and research-based arguments that such infrastructure will actually be cheaper, less disruptive and more demonstrably feasible than a corresponding brownfield-only intensification.

The Auckland Unitary Plan was a less constrained process, and came to a hybrid approach. Data from 2018 and 2019 shows that this plan was delivering objectively better quality intensification outcomes as compared to what is happening in 2021-23

In the case of Kumeu, focusing solely on avoiding flooding risk is overlooking opportunities for enhancing our environment's resilience. It must be recognised that a significant contributing factor in recent Kumeu flooding events was inadequate local maintenance and upkeep of waterways. With planning and initiative there are obvious opportunities to mitigate the issue cost effectively, whist causing little local disruption.

The challenge of water management in Kumeu (and downstream) is much more realistic to mitigate than an unproven retrofitting of nature-based infrastructure in brownfield areas.

The National party has withdrawn support for much of the legislation underpinning the FDS. An election is coming up in October. The lack of local and industry consultation for the FDS has resulted in a rushed, unrealistic and unfeasible plan. The assessment of the benefits of greenfield vs brownfield were decided behind closed doors, and the outcomes biased.

Council has the opportunity to work with the next government to redefine the planning and legislative framework, delivering better outcomes for council, developers, and local communities. This high priority issue requires engagement at the highest level between Auckland council and the next central government

It is prudent for council to delay making final decisions about Auckland’s future development strategy until after the election, when longer term central government budgets and changes to the development regulatory framework should become clearer.

Focusing growth

Issues identified and chain of logic, by category

Intended city form

Inaccurate Infrastructure assumptions

Planning issues, RMA, and council's need for better control

The Future for Kumeu

#8530

Issues Identified – City form & future growth

More detailed analysis and data justifying each point can be found from slide 8 - 11

- When unconstrained by statutory requirements from central government, Auckland planned a hybrid growth scenario (Auckland Unitary Plan), which better achieved the council's stated objectives around quality compact form compared to the currently proposed FDS

- The statutory requirement to adopt NPS-UD and MDRS fails to incentivise a quality compact urban form. Brownfield development based on the application of this zoning is proceeding in a scattergun way, not a Quality Compact form. The presented Growth Scenarios are based on dogma about the city developing in a compact way around infrastructure, but council has no real-world tools to impose this dogma. The development form is not heading toward any of the Growth Scenarios presented, and the evaluations of such forms are therefore irrelevant. The FDS does not introduce any proactive tool for restriction of development in the brownfield. This is a very high priority issue that must be resolved.

- I support the need for a focused intensification in carefully controlled brownfield areas. However, the *infrastructure triggered development* required to adopt the more intensive scenarios in the FDS will force development to slow down, and Auckland will continue to fall short of its housing needs

- Plan change 78 is already on hold due to the recent flooding events, also restricting new supply and likely exacerbating affordability issues from 2025 onward

#8530

Issues identified – Infrastructure Assumptions

More detailed analysis and data justifying each point can be found from slide 12 - 15

- Controlling growth via Infrastructure dependence is a reactive process, and a recipe for pushing a blanket-upzoned Auckland to breaking point. This would destroy many dimensions of liveability for existing residents, and work against council's stated objectives and outcomes.

- No proactive method to halt development within the current zoning framework or legislation exists. Other than profit, the only incentive driving development location is that developers won't sell if infrastructure is over capacity. This forces local infrastructure to fail before the incentive is reached. MDRS must therefore be over-turned

- Key infrastructure deliverables for the more focused brownfield intensification scenarios are uncosted, unmodelled, unproven, and potentially unfeasible. It's unclear who is paying for them, doing the work, or organising purchase of private land where required. Such plans - assuming they are feasible - are likely to net out as substantially more expensive than a corresponding greenfield development, where developers can be partnered with to deliver much of the required local infrastructure

- The study that council used to state as fact that brownfield infrastructure is more affordable than city fringe greenfield is not applicable to Auckland. The authors of this scientific paper would not support the conclusion without substantial further work on Auckland's specific context.

- Focused, high quality brownfield intensification will be slower to deliver than the current scattergun townhouses, because of council's need to improve local infrastructure – especially nature-based water infrastructure. Therefore (assuming MDRS is overturned due to the negative outcomes), to prevent a slow down in delivery of new housing, Future Urban land will need to be released. Provision of arterial infrastructure for Future Urban areas will be needed, and this appears less risky to budget for and deliver than the plans for nature-based water infrastructure within the brownfield.

#8530

Issues Identified – Better greenfield planning

More detailed analysis and justification of each point can be found on slide 16, and the appendix

- The current process of Private Plan Changes and SHAs in greenfield areas - especially those outside the Rural Urban Boundary - is acknowledged to create sub-optimal outcomes for new town design. Solutions that meet the needs of council, developers and the local community are possible though closer collaboration. But such solutions are not appear covered or advocated for in these documents. The needs of Auckland – especially with respect to changes to the RMA – need to be worked out now. Auckland has a unique opportunity to advocate for change to whatever central government regime comes in October. Auckland MUST drive this process forward urgently

- The council's vision for Quality Compact urban design can be delivered in new greenfield developments, planned and delivered at a medium density. Increased greenfield density would serve as an incentive for developers to work within an overall town structure plan and assisting by delivering integrated water infrastructure and a higher % of green spaces.

- The evaluations of the benefits and drawbacks of brownfield intensification vs greenfield development in your Growth Scenario Evaluations appear biased toward favouring brownfield. There are many instances (outlined in the appendix to this document, slide 21 onward) where the exact opposite assessment appears better justified.

- Given the appearance of bias, a lack of debate, little concrete supporting evidence, and an outcome that was forced by central government legislation, Growth Scenario Evaluation scores should be viewed as unproven assumptions. These require open debate, rather than being decided by experts behind closed doors

- There is also the need to acknowledge that the Growth Scenarios themselves are unproven models, and a 5th Scenario better mimicking current scattergun development form should be evaluated (see slide 10)

#8530

Issues identified – Investigation into Kumeu

Designing a satellite town ground-up for 21st century Auckland. See slides 17-19

- On the review of Kumeu specifically, focusing solely on avoiding flooding risk is overlooking opportunities for enhancing our environment's resilience. It must be recognised that – as confirmed by Greg Sayers - a significant contributing factor in recent Kumeu flooding was inadequate local maintenance and upkeep of waterways to the standard previously followed. With planning and initiative, these issues are feasible to mitigate whilst causing little disruption.

- Whilst avoiding building directly on floodplains appears an easy win, Kumeu's easy contour and network of gulleys with narrow flood paths presents the opportunity to build resilience within our community without moving much earth.

- Starting with a blank slate and putting nature-based water infrastructure at the heart of our community offers planners the opportunity to build a community that matches Auckland council's aspirations for urban design and planning outcomes.

- In our shared vision for Kumeu, walking and cycling paths could cross the community separated from roads, integrating linear open spaces along natural infrastructure into the community. These paths can bring active modes of transport along these routes to civic amenities such as childcare, schools, cafes, small parks, bbq areas, the vineyards, and ending in a pedestrian friendly town center that would offer something different to more car-centric shopping districts.

- NW Auckland around Kumeu has many natural amenities. The traffic here is terrible at the weekend! Bringing Kumeu closer to both Aucklanders and tourists would offer a new and unique perspective on true Auckland life to many more people. A destination that could rival Matakana and Waiheke for attractiveness - accessible to everyone

- In this vision, planners have the opportunity to realise a thriving, walkable and mixed-use community. One that delivers positive tax revenue via a refreshed and unique business district. A development building upon Kumeu's existing reputation as a destination for weekenders seeking outdoor entertainment. As such, Kumeu can become a beacon for Auckland living, designed for a 21st century kiwi lifestyle

In depth analysis

Comments & data supporting my conclusions on the failures of FDS

In some cases, more work or data is required to reach a conclusion – suggestions for a process is outlined

#8530

Land for development is over supplied, but…

Little of currently consented development has access to sufficient infrastructure. Council's spatial models assume restriction of much of the current development, thus slowing delivery of new housing

- Auckland's planning free-for all has resulted in dwelling consents progressing at a record pace in 2021 and especially 2022
- However, According to Auckland Council Research and Accounting (ACRA), **in May 2023** **only 28% of new dwellings consented were within 1500m walking catchments of the rapid transit network.**
    - This is the only spatial analysis of infrastructure availability that I can find reported on by Auckland Council
    - This metric went substantially backward in 2020 and 2021, and on average was higher in 2018 and 2019 than it was over the last 12 months.
    - The absolute number of dwellings consented within 500m peaked at about double where we are today in May 2019 (~1000 vs ~550 from eyeballing chart). As a %, it was more like 2.6 times as many dwellings within 500m walk of rapid transit when the Unitary Plan (AUP) was the only operative zoning - demonstrating the superiority of the AUP against the objectives
        - % of total dwellings within 500m is not reported by ACRA, but total dwellings consented in 2019 is reported by stats NZ may 2023 as 13,754, and in 2023 20,029.
        - Based on eyeballing the ACRA chart, and using stats NZ may 2023 dwelling consents:
            - % total dwellings within 500m in 12 months to May 2019 peaked at ~7.3% (~1000/13754)
            - % total dwellings within 500m 12 months to May 2023 ~2.8% (~550/20029)

- A more focused city development around improved infrastructure necessitates a restriction in scattergun MDRS development patterns
- If infrastructure undersupply is going to be used as a way to restrict development, then this would likely cause a fall in the amount of dwellings delivered, since 72% of new development is currently happening in locations less supplied with the best quality transport infrastructure
- In order to deliver a "Quality Compact" form, council requires brownfield development to be shifted to be delivery in tightly controlled development corridors, triggered for development by local infrastructure improvements (especially storm water, but also sewer, schools, probably power, medical, etc etc).
- Since such infrastructure will be costly, time consuming and in the case of nature-based storm water subject to purchase of private land - necessitating consultation
- Immigration has now returned to record rates, so a drop in the rate of building will further harm Auckland's global competitiveness and local living standard metrics
- The necessary slow-down in brownfield development requires a hybrid approach, opening up of more greenfield land to prevent restriction of supply of new homes.
    - This is what was planned via the Unitary Plan, when a better researched and consulted planning process was followed

“Quality Compact” spatial form?

#8530

Under current and proposed planning framework, are we achieving any of the 4 presented spatial forms, or something else?

- Council’s presents 4 spatial models for the evaluatation of Auckland’s potential future “Quality Compact” urban forms.
  - **These spatial models are not based on the results of the planner’s models running freely with only the legal planning framework influencing their outcome**.
  - Various **dogma/assumptions** (listed FDS section 3.1.1) are incorporated. Manual interventions are applied to the model to force it to fit the dogma, creating the 4 idealised urban forms that are presented.
  - It is clear that the assumptions built into the model are **not incentivised within the planned zoning**, based on NPS-UD and MDRS. In fact, I believe these concepts for a **quality compact urban form are disincentivised and undermined** by the statutory requirement to adopt these zoning rules.
  - As mentioned, Auckland Council Research and Accounting, **in May 2023 - only 28% of new dwellings consented were within 1500m walking catchments of the rapid transit network**.
  - Therefore, the assumptions built into the presented spatial models do not represent the real-world planning framework enabled by NPS-UD or MDRS, or any *proactive* power that the council currently has to control the city’s development.
  - **Controling development through the failure to upgrade infrastructure is the worst possible solution, creating negative outcomes for all residents** and should be avoided at all costs. See slide 16 for more comment

- Council should provide and evaluate **a 5th scenario**, which shows the output of the planner’s model as a result only of the **model running unimpeded** with the proposed planning rules and market conditions in place post plan change 78 and NPS-UD/MDRS based zoning.
  - No adjusting the real-world development capacities for each type of dwelling
  - No interventions because of a dogma that housing will develop close to transport.
    - Developers will develop where profit is available. Transport, walking catchment or other amenity is not a primary driver of developer’s decision of where to build – only that the house built is possible to sell at a profit
  - No manual interventions due to asssumptions about local infrastructure constraints being reached
    - Let’s see what outcome the planning settings actually drive, without needing to cope with the negatives of allowing infrastructure to become overloaded in order to force development out of that location
  - No manual interventions to the model’s natural outcome, outside of powers that exist within the currently proposed planning framework

- In the case of the already presented models, **list the manual interventions required to force the model to adopt the urban forms presented** in an appendix.
  - The planners can then state against each intervention or adjustment how such a market intervention or forced adjustment is expected to work in practise.
  - What legal or planning incentive structure would they require to be added to existing regulations to *force* such an outcome?
  - What is their suggested timeline and feasibility for the introduction of this requirement/incentive – ie is that really going to happen or not?
  - Where do planners forsee that certain infrastructure will become so over capacity that a decision for no further development in that area will be forced?

The information gathered from this process would form a more **critical assessment of the process needed to actually achieve the idealised Spatial Forms** presented. Auckland Council can then more **reliably assess the risk that Auckland fails to develop to the desired “Quality Compact” urban form, and achieve the expected benefits**

A scattergun, blanket intensification?

#8530

NPS-UD and MDRS do not incentivise “Quality Compact” urban form. Data for development patterns since NPS-UD and MDRS suggests low quality, blanket intensification.

- **MDRS appears to over-supply land** available for low-level intensification (3 storey).
  - Much of the cheapest land available for development is **not within walkable catchments,** and so the MDRS runs directly in opposition to your objectives for a more active and public-transport-using city.

- MDRS came into force August 2022. An **analysis of the location of new developments** since that time in the newly released land should provide an indication of the way that Auckland is likely to continue to develop under this zoning.
  - Auckland Council Research and Evaluation unit, July 2023 update, p10, shows **the distribution of new dwelling consents in May 2023 appears scattergun**, with only moderate skew toward the 1500m rapid transport walking catchments, and no skew toward 500m catchments.

- It is likely that over-supply of land for terraces will **reduce the demand for higher density developments**.
  - Stats NZ 30th may 2023 building consents issued table 4.
    - 12 months to May 2019. Apartments were 21 5% of new dwelling consents. 12 months to May 2023, apartments were 14.4% of new dwelling consents
    - A flat absolute number, as a lower % of larger base across the period shows that development of apartments is at the current maximum development capacity of the city

- **NPS-UD also appears to over-zone land** available for development of apartment buildings.
  - Stats NZ building consents issued April 2023 shows no increase in apartment dwellings between 2019 and 2023.
  - All the increase is in “townhouses, flats and units” category, (which is a little too aggregated)
  - Given Auckland developers’ limited ability to deliver apartments, has the increase in land value for land upzoned to apartment buildings due to NPS-UD meant that **the best land is now too expensive for (more deliverable) townhouses, and these are being pushed out**?
  - The over-supply of land for high intensity development could paradoxically reduce the development of the most desirable locations, because it’s now too valuable for developers to put low rise town houses/units on.
  - This hypothetical process, born out by the data on decreasing % of development within 500m of rapid transit, represents a reversal of many of the stated benefits of brownfield intensification

The most recent **data from Auckland Council Research and Evaluation unit shows that the development at present is primarily scattergun**. Development was a little more focused in 2019 than currently, and became more scattergun particularly upon the adoption of NPS-UD

Overall**,** a full analysis of new building starts or completions by type, overlaid on a map of AKL since these changes were implemented should confirm that **we are not currently heading toward a quality compact form**

Infrastructure affordability

#8530

Council's statement that brownfield development is more affordable than greenfield is an unproven assumption. The scientific paper cited is mis-used. Being so key to the decision, this error *must* be flagged to all decision makers voting on the FDS

- FDS, page 19, I quote:
  - "At a regional scale, infrastructure servicing urban intensification varies in cost depending on its location. Development in existing urban areas typically costs less when compared with development in future urban areas. **Adding additional growth at the fringes of our existing networks is the least cost-effective investment in infrastructure to support growth. The best return on investment is closer to the centre**."

- This is stated as a known/proven point, but inadequate work has been done on the Auckland context
  - You cite a single, improperly used source.
  - The infrastructure costs section (p4) of this paper states - I quote:

    "The challenge in interpreting the assessments is that **infrastructure costs are so heavily dependent on area-specific factors**. For instance, road costs among different prospective development areas may vary based on the necessity for major arterial roads, **costs for sewerage and water infrastructure could vary immensely depending on terrain and trenching conditions**, and many infrastructure components will differ depending on the level and degree of excess capacity"
  - The FDS and supporting reports make no effort to do any other true accounting for the area specific factors within Auckland's brownfield or greenfield intensification plans. The use of the cited paper, given the quote above, is misleading. It draws a conclusion that the paper's authors did not intend, and the assumption is discredited.
  - **Your statement on infrastructure costs, and the assumption of relative cost differences should be discarded. This should also be flagged to key decision makers voting on the FDS, as such an important point being unproven and potentially incorrect is central to the decision**

- Points to note on the research paper your team used as a source
  - The paper from 2007 was based on analysis of single Australian city, Perth, and drew on studies from 1972 – 2000 - before climate change was a planning concern.
  - This is not a city with the same water management challenges, or any similar nature-based water infrastructure requirements in either brownfield or greenfield developments.
  - It is a city built on a grid, with multiple river crossings and relatively few traffic problems compared to Auckland's highly restrictive layout and dependency on just a few arterial roads.
  - The infrastructure challenges of Perth 30-60 years ago are only marginally relevant to Auckland in 2023.
    - More work on the Auckland context, as well as more relevant case studies should be sought

- You can download the paper here (PDF) Assessing the Costs of Alternative Development Paths in Australian Cities (researchgate.net)

Infrastructure affordability

#8530

How can we move toward a more credible analysis of the costs of nature based water infrastructure in a brownfield setting?

The FDS paper and supporting materials talks a lot **about nature based infrastructure**. Parks as wetlands, Swales, ponds, tree pits, roadside drainage gulleys, etc. Scenario A narrative, page 67 of the Growth Scenarios Evidence report states: "Floodplains in existing urban areas are redeveloped (to allow for adaption and mitigation)". But your consultation materials contain no hydrological models that show this will work, there's no draft layout for infrastructure applied to the real world city plan, and **no feasibility study or accounting for the real world changes required (including purchase of private land and buildings) to adequately mitigate the problem**.

As it stands, with no feasibility study conducted **nature based infrastructure in the brownfield is a fine aspiration, but nothing more**. In contrast, the concept is already being delivered in new greenfields developments such as Hobsonville or the Kumeu SHA. The council needs to do **more work to demonstrate that brownfield flooding and coastal pollution from stormwater will actually be mitigated** – where, how, by who, at what cost, and on what timeline?

- There should be major concern for a **blow out of Auckland's budget on brownfield intensification, and/or the project's failure to adequately resolve water management**
    - Retro-fitting large scale nature based flood mitigation into the existing city plan is an extremely complicated and potentially expensive set of projects. Designing it into new greenfield areas and requiring developers to bear the cost intuitively seems much simpler and more realistic to deliver. Indeed, it is already happening.
    - I would argue that once fully loaded costs of brownfield infrastructure changes are considered, additional arterial roads and public transit would be much cheaper than the level of brownfield remodelling required to execute on your nature based water infrastructure plans
    - Also remember you are likely making incorrect assumptions about a very focused urban development area. A more scattergun development pattern (MDRS) will require short-term, city-wide water management improvements.

- what specifically needs to be done to cost out the nature based infrastructure plans?
    - A proper set of **drainage basin hydrological models** that demonstrate how the problem will be solved in practice for each basin
        - Or, at least do this work for a single drainage basin so you can model it and cost it?
    - How much more water will be produced by new terraces covering existing gardens in the suburbs?
    - How much excess water will these wetlands handle? Where will all the gulleys and swales leading to them be placed **and fit into the existing city structure**?
        - (don't forget to also leave space for new cycle lanes, bus lanes, maybe a tram route?!)?
    - **feasibility study** for the brownfield transformation in terms of timeline, contractor availability, traffic disruptions, likely cost of works?
    - Most important: **Account for acquisition of private land**. Estimate the timeline in terms of public consultation, appeals process, etc, before work can start

I know this is a chunky, difficult project. But only once this foundational issue within your plan has been looked at in detail can **a more credible assessment of the relative costs of brownfield vs greenfield may be made**.

It's worth noting the risk that the difficulty of delivering such projects on either side (greenfield, brownfield) may result in restrictions to housing availability and affordability, especially if there are further flooding events or the pause to plan change 78 continues. Delays and subsequent affordability issues could impact Auckland's competitiveness and future tax revenues

#8530

Infrastructure affordability

Scattergun population increase would result in blanket stress on public services

- As argued previously, **MDRS detracts from a quality compact urban form when compared to the Unitary Plan** because it spreads available development land out too much, and so it has reduced the % of high density housing delivered in the best locations
- True Quality compact intensification a-la Unitary Plan directs planners to provide new services in specific areas, focusing infrastructure spend in an efficient way. But **MDRS puts uniform pressure on all existing council services.** This is the opposite of creating efficiency, and represents a disastrous outcome for Auckland

If brownfield intensification continues in a scattergun form, additional infrastructure costs need to be factored

- New houses everywhere will mean **every school needs to admit more students**.
- How well will the **electricity grid stand up to increased car charging demand**, as well as blanket and scattergun intensification?
- How about the **sewer system**? Developers of new terraces only need to ensure the pipe to the street is able to cope. If the development is scattergun, you need to upgrade almost every sewer system simultaneously?
- Where do you put new **community medical services**, if the population increase happens everywhere?
- If the population increase is spread out rather than focused along key routes, the actual local density change is not that noticeable. So **where do you increase bus service frequency, or make new routes**?
- What actually happens to the traffic model and patterns, if the development doesn't happen as much in walkable catchments as your models predict. The % using car for their journey stays the same or even rises, and your assumption that existing traffic patterns are able to cope could **tip the already fragile and struggling road system into true gridlock**

#8530

Infrastructure triggers control development

NPS-UD and MDRS leave Auckland up shit creek

- NPS-UD and MDRS zone far, far too much land for development in the brownfield, and leaves council's planners with no proactive tools to control where it happens
- The only incentive for location I see within Council's power is that the development will be controlled by areas reaching and passing the limits of the local infrastructure capacity. **Can planners outline any power that they have to restrict development right now?**

To boil this incentive structure down

- Developers can build terraces/townhouses in the brownfield where-ever they like.
- The only incentive that will stop them building is that the place will become so broken that nobody chooses to build there anymore
- **Townhouses and units will go in all over the place until either the toilets back, the local roads gridlock, or there are no places available in local schools**.
- Then, developers will have no choice but to build on the expensive land where we have made some infrastructure improvements

This incentive structure works directly against the objective to deliver "improvements to the environment, the economy, and people's wellbeing"

It is shocking that this legislation has been brought into force, and it seems certain this is not planner's preferred method for controlling the development of the city form. Should this point not be made more clearly, front and center, within these documents? I know there's a hope that this will go away after the election, but **what if Labour gets re-elected and the city actually has to follow this plan?**

Were Auckland's **town planners consulted in the drafting of this legislation**, and given the voice for their expertise?

Could Auckland's local interests be voiced more loudly as an election issue, or influenced with whatever incoming government, before a new FDS is adpoted?

Can **planners become more involved with revision of the RMA and the definition of a more workable legislative framework for Auckland going forwards**? It seems like the kind of issue Auckland currently has the right mayor to work on this right now, and may not in future

The problems of private plan changes

#8530

Private plan changes and SHAs are listed in your evaluation as a key challenge. I find no initiative within the FDS documents that suggests solutions. Now is the time for blue-sky thinking on this topic.

- It seems the only solution the council currently has is to block development.
- An open collaboration between council, developers and the local community can come to solutions that enable development where all parties get their objectives met. The lack of consultation around the FDS has not enabled this to happen.
- Council's city planning objectives should be applied to Greenfield developments, not just brownfield. Indeed, in greenfield there is more potential to develop quality, planned outcomes via satellite towns
- Auckland's **new greenfield developments should be delivered more intensively than is currently being done, to further encourage walking, cycling and a thriving and a pedestrian focused town centre** where pedestrians choose to dwell, spend leisure time and generate business tax revenue.
- Key deliverables are walkability via linear parks along water infrastructure, cycling routes, quality open space and a degree of mixed use zoning (such as placing new primary schools, childcare, cafes or other amenities within the walking fabric of the neighbourhood). Therefore, **town structure needs to be planned before development starts to dictate road layout. New towns must be designed around people, not just cars.**
- **In order for that to happen, private plan changes, SHAs and land release should only follow completion of local structure planning.**
- **Developers can be compensated for providing infrastructure such as storm water management and increased greenspace by allowing for a higher overall development intensity.**
- Current Greenfield development zoning appears to restrict density in towns with lower than 5000 population. If it was made clear to residents of these areas that this restriction was a consideration in restricting the development of new infrastructure to serve the area, there would likely be more local support for increased development intensity
- Private plan changes **outside of the Rural Urban Boundary prevent efficient provision of public transport**. Given the amount of undeveloped land within the RUB, planners and council should work with incoming government to have this specific problem halted legislatively

- Can the next government be lobbied to make necessary legislative changes to resolve these issues by **changes to the resource management act**?
    - Perhaps a council discussion/debate process working between council, planners, and local community to recommend a productive route forwards?
    - Idea: What about bringing forward structure planning, so that it's done years ahead of land's scheduled release and before any Private plan changes or SHAs can happen?
    - Land release could still be based on infrastructure triggers (particularly roading) as a necessary deliverable
    - Could the mayor take on responsibility for being more vocal about the need for central government action to resolve the current imbalance of power between council and developers?

Someone in a prominent position needs to stand up for the needs of the city. Localism/council is the most more incentivised to do right by the future inhabitants. **Wayne Brown appears the type of no-nonsense technocrat who may be able to push the right changes through with central government**. Key technocrats within council must take this moment to influence Mayor Brown to take action on influencing this further.

If key people at council behind the scenes want to see change, the time is now. **We have an independent minded, technocratic mayor. If it doesn't happen now, it's not going to**

Future Urban Areas in need of review – flooding response

#8530

- Kumeu specifically has suffered several flooding events recently
- The proposal to mitigate environmental risks by reassessing future development in vulnerable areas is commendable. Nonetheless, focusing solely on avoiding risk areas might be **overlooking opportunities for enhancing our environment's resilience**, particularly against flooding. With this intensity of rainfall, flooding and slips are a widespread risk for Auckland, with sheeting of water resulting in flooding even when not at the bottom of hills and subject to “rising water”.
- A significant factor contributing to recent flooding events in Kumeu is inadequate planning, maintenance, and upkeep of flood defences and waterways
- the newly developed housing areas proved resilient, showing that the newest water management initiatives are working to protect new housing
- Kumeu river flooded in areas of old development
- As confirmed by Councillor Greg Sayers, the Kumeu and Kaipara rivers used to have weeds sprayed by helicopter, and the course was dredged by tractor all the way from Kumeu river down to Parakai in years gone by. This has not been done for an extended period, and a simple inspection of the river shows that the flow is obstructed by weeds and debris, including large trees
- The river is at 23m elevation in Kumeu. The river joins the Kaipara and enjoys a significant gradient down to the natural floodplain from Woodhill to Helensville and Parakai. Water should be able to flow out of Kumeu, as the river drops over 10m by the other side of Waimauku (~5km). The floodplain itself around woodhill through to parakai and helensville is well-suited for controlled water dispersal. Land there is cheap, and huge areas are already a marsh that’s used only for grazing and baling silage.
- I see no evidence of higher value cropping on this floodplain, despite a LUC of 2. Either the land is already too marshy in winter for higher value crops to be grown, or there’s just no market for a whatever produce a higher value land use may theoretically yield?
- Exploring additional flood overflow connections, like one between Kumeu river and Brigham Creek, could serve as an additional solution to protect downstream areas such as Parakai and Helensville to the west of Kumeu from the largest events. The creek is only about 1.5km from kumeu river, over which the water drops nearly 20m. The creek has a local termination at the harbour, and an undeveloped shoreline.
- The feasibility of such a connection is clear. It would cross a greenfields area (still zoned Rural) and thus not cause significant local disruptions compared to the kind of nature based water infrastructure plans mooted for brownfield areas, which appear to require extensive earth work and urban remodelling within already populated areas

Bringing everyone closer to natural amenities #8530

NW Auckland around Kumeu is already a weekend destination for many (by car)

- Muriwai - The most accessible of the western beaches
  - Popular surf spot, a different amenity to any of the eastern beaches
  - Fishing in the tasman rather than the gulf, which seems to be under intense pressure
  - Off road vehicles from Muriwai up to the kaipara
- Riverhead and woodhill forests – the most accessible forest tracks in Auckland for both walkers, casual cyclists, and mountain bikers
- Walking, tramping routes in the unique setting of Auckland's extinct supervolcano, the Waitakere ranges
- The gannet colony
- Vineyards – substantial tourism to Waiheke could be replicated in the Kumeu vineyards.
- Farmers markets in Kumeu and Coatesville, as well as popular farm shops that serve as destinations - such as Boric market
  - The potential to offer more retail of locally sourced food to a growing local population
- Sports clubs, such as northwest united and cricket teams based out of huapai domain, the rugby clubs at Riverhead, and world class golf courses at Huapai and Muriwai
- Plentiful, underused public greenspace already protected from development - Huapai Domain and the Kumeu showgrounds
- Shooting, paintball, horse riding, windsurfing, kite boarding, motocross locally accessible
- Popular wedding venues - with no hotels serving them
- The ability to provide hotel space for all these amenities in Riverhead-Kumeu, raising more taxation compared to residential

Creating a unique business district that supports the tax base

#8530

- Business districts tend to be the primary source of tax revenue for a city, not residential areas.
  - Research (link) shows that modern, walkable, mixed use business districts that integrate with pedestrians tend to generate strong positive tax revenues for the city
  - In contrast, out of town mall type developments in the USA (mimicked in Auckland) are really struggling - particularly because of how much land is wasted by carparks

- Auckland's existing out of town business districts are car dominated, big-box store designs that discourage walking, dilute potential tax revenue by devoting too much space to parking, and only really incentivise fast casual dining rather than fostering a day/night economy
  - Albany, Silvia park, Westgate/North West
    - Accepting that the pedestrian area around Te Manawak library in Northwest is a small success that could be built on

- Transforming legacy areas such as those noted into more pedestrian friendly spaces poses challenges
  - Restructuring costs
  - Resistance from existing businesses
  - Traffic management

- It seems comparatively easier to design new Greenfield satellite towns around active transport, medium density, mixed use business/commercial/residential, and high public transport interconnectedness to the rest of the city, compared to forcing this change in an aready defined road layout
  - Hobsonville serves as a case study of some medium density with some well used mixed use buildings along key roads
  - The lack of a few traditional town centre stores around Catalina bay seems a missed opportunity
  - Kumeu appears a unique opportunity to create a unique destination town for "weekend warriors", creating more local employment
    - With the right planning it could be a Matakana style destination for al-fresco cafes, vineyards, boutique shops, and on to the outdoor pursuits
    - Increasing the public transport to Kumeu seems a good way to bring all of central, west Auckland and even parts of the north shore closer to the unique and truly quality outdoors pursuits that this area offers

Your process for public feedback

#8530

Leading questions make it hard to know whether to answer agree or disagree. The quantitative element of survey responses are likely biased toward agree and should be discarded.

- The research process for the consultation asks incredibly leading questions, that contain inbuilt assumptions about issues that are the central subject for debate.
- I understand that not every respondent will have read the documents and so you felt a need to include what you want the person to respond to within the question, but still this makes for biased and unreliable research outcomes
- I would suggest that responses are more valuable when coming from people who read your planning documents, so it's disappointing that to resolve the problem of different level of engagement, the whole pool of agree/disagree is probably made unreliable. I imagine you would find it difficult to group the qualitative responses based on those who agree vs disagree. It's almost impossible to select disagree, because of inbuilt assumptions in the question.
- Eg, if you read question 1, and you accept the first sentence as truthful, you would have to be insane to disagree with it. This is essentially gas-lighting the research participants.
- The same issue can be seen throughout the 4 questions you posed for public feedback.

Appendix

Identifying bias in Growth Scenarios assessments

Alternative chains of logic demonstrate that more debate is required

Supporting greenhouse gas emissions reduction via transport

#8530

Principle 1 of the quality compact urban environment

- There is an understandable assumption that development of future urban areas will result in more greenhouse gas emissions, due to distance from the city
- The assumption should be extremely under-weighted compared to the other principles, because it is **a problem that will largely resolve itself** between now and 2030, and technology adoption probably means 95% resolved by 2040 at latest.
- Already, year to date **2023, 15.99% of vehicles sold in NZ were fully electric, or plug in hybrid**.
    - https://www.mia.org.nz/Sales-Data/Vehicle-Sales#hybrid
- The UK currently states that new petrol and diesel cars will not be on sale from 2030. New Zealand appears to have made the same commitment with a 2035 target date. Manufacturers and consumers will increasingly choose EVs & plug in hybrids (as well as potentially other new EV technologies) ahead of and in anticipation of these final deadlines. Nobody wants to buy a vehicle that is not future proof
- This means vehicle sales by type by year should follow an adoption curve from 2023 to either 2030 or 2035 reaching close to 100% adoption of 0 emissions vehicles at that point.
- The phase out of existing vehicles will take longer, but the replacement cycle for cars is fairly short
- **New Zealand has one of the cleanest/greenest electricity networks in the world. The adoption of electric and plug in hybrid cars is naturally resolving this objective.**
- The key to achieving this objective is more about making sure the network is resilient enough to cope with everyone charging their vehicles, which can and should be designed as a requirement for developers in new greenfield locations
- There's an **assumption in your analysis that working patterns will remain the largely the same**, resulting in a lot of work travel. I would argue the assumptions on work from home are already a lot too low, and that **increasingly people will want to have co-working in out of town areas, enabling them to live closer to Auckland's natural amenities,** commuting to a central office only once or twice a week. I can't find good data on this travel pattern in New Zealand
    - study on **London remote work patterns shows 16% working from home fully, and 28% partially**, from ONS data from sept 2022 to Jan 2023 - **after the pandemic**
        - https://nz.finance.yahoo.com/news/london-highest-levels-working-from-home-123915148.html

- In this sense, bringing Future urban areas into live zoning becomes more desirable as they **bring more of the city in contact with the wonderful outdoors lifestyle that people actually associate with New Zealand**
    - Horse riding, shooting, Strawberry picking, Surfing, 4x4, forest walks, mountain biking, vineyards, fishing, deer hunting, etc
    - These represent quality outdoor spaces to Kiwis far more than improved walking and cycling infrastructure in the city
    - They offer the opportunity for Auckland to become a stop on the tourist route, rather than just an airport people pass through

Supporting carbon emissions reduction – building type by location

#8530

- You make the assumption that buildings in scenarios A-D are built in the same way, and only floor space and attached/detatched style make a difference to carbon emissions via heating and cooling costs.
  - Your analysis is erroneous in focusing primarily on the heating and cooling. This is already done in large majority via a clean electricity network, so can be largely ignored.
  - Building style will clearly vary, with taller buildings being needed in a denser development because of higher land values. Therefore the carbon used in the building process is highly relevant, and much more is used in concrete and steel buildings than wood frame

- Council's analysis ignores the up-front contributor to the emissions footprint – construction - which is also done with entirely unclean energy sources
  - **Concrete and Steel collectively make up up 13.5% of global CO2 emissions. These don't use the electrical network, so wont become clean on any short timeframe**
    - IEA. *Tracking Industry 2020* (International Energy Agency, 2020).
    - https://www.nature.com/articles/d41586-022-00758-4#ref-CR1
  - A more intensive urban form with more tall buildings (scenario B and especially A) will result in much more use of concrete and steel in construction, and also much more extensive foundation work involving heavy machinery
  - These materials also result in more heavy vehicle movements, creating much more CO2 (heavy vehicles are not currently moving away from diesel to any relevant extent, and I'm unaware of any currently active legislation driving this, globally)
  - On other city amenity factors - more air pollution, more traffic disruption due to the traffic control required to deliver such materials, dustier construction sites, more heavy metal pollution, an overall negative impact on the livability of the city for all existing residents during brownfield construction projects which require deep foundations, etc etc

- In contrast, building wood framed buildings involves an amount of removal of CO2 from the carbon cycle, "sequestering" it in the building material. The foundations of the buildings are much less substantial, so the carbon released in building them

Air quality – not a credible set of scores

- The plan which involves large scale construction in the city area is judged to have a highly positive impact on air quality - incredible!
  - By the time this city transformation is done, all vehicles will be 0 emission anyway. The main short term issue is construction and pollution from traffic disruption. In scenario A this will be close to the most existing inhabitants. Scenario A should be negative, and D highly positive.

- Digging deep foundations and heavy machinery to move large amounts of material?
- Concrete dust from construction sites much worse in apartment buildings
- Increased movement of heavy diesel construction vehicles for steel, concrete buildings?
- Increased local traffic jams because of the traffic control required for large scale infrastructure remodelling (nature based infrastructure) within a narrow existing road network?

	Scenario A	Scenario B	Scenario C	Scenario D
Evaluation scores	+3	+2	+1	+1

Infrastructure costs

#8530

the extent to which scenario results in measurable public monetary cost or losses over time

There is no analysis at all of the cost of infrastructure that needs to be added to the existing city to support the growth.

If just 800 houses across the city have to be purchased to create new water channels and ponds, this would be the cost of a highway extension to kumeu

Infrastructure in future urban areas is often paid for by the developers

How will schools be upgraded if you get blanket MDRS fill? What's the cost of that?!

- Scenario A results in the most efficient use of infrastructure and the least monetary cost.
- Scenario B enables higher density and infill likely to generate less traffic and shorter trips, with consequentially more cost-efficient operations and maintenance expenditure.
- Scenario C has good utilisation of existing infrastructure but still requires new infrastructure to support future urban areas and therefore has minor negative impacts.
- Scenario D requires the greatest amount of new infrastructure with the most significant costs (35 per cent higher than Scenario A) and least efficient use of infrastructure because of lower intensification in existing urban areas and expansion into additional future urban areas.

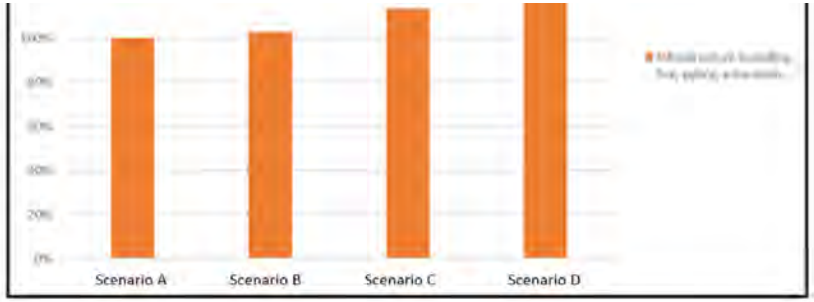


Figure 23 – Relative cost of infrastructure to service expected growth

Efficiency is considered a core element of the scoring assumption. However, the differentiation between the scenarios is not significant. Scenario A utilizes existing infrastructure but there are upgrade costs to provide sufficient capacity although less extension is required.

	Scenario A	Scenario B	Scenario C	Scenario D
Evaluation scores	+2	+1	-1	-3

Costs of development

- This only looks at the challenges the underlying land poses. It ignores issues such as site access in the city. Obviously apartment buildings are so expensive to build that relatively few developers actually do it. They require cranes, concrete, steel. Also road/traffic control and upgrading pre-existing infrastructure rather than placing new
- Surely all this makes scenario A the most difficult/costly in terms of development?

Costs of development

The following criterion was evaluated by subject matter expert based on GIS analysis of land affected by physical constraints that make development more expensive. Physical constraints are identified through GeoMaps and include peat soils, unstable land, and steep slopes and GIS analysis identifies the proportion of each MSM zone are affected by physical constraints.

At the evaluation workshop, the relativity between the scenarios was agreed because Scenario D takes development into more marginal land. However, it was also acknowledged that within existing urban areas there may be additional development costs that are not addressed by the evaluation.

	Scenario A	Scenario B	Scenario C	Scenario D
Evaluation scores	-1	-2	-2	-3

Access to quality open space

#8530

- Sorry, but this scoring is silly and clearly biased
- The plans which involve building on what are currently gardens in the city, is scored close to moderately positive because these people living in an intensely developed city will be walking and cycling more – around a busy city!
- The plan that involves more people living closer to Auckland's much loved countryside and forest areas, and new public transport bringing everyone else closer to it, is scored negatively. That's even though New Zealand is a country of weekend warriors who head out of town for their passtimes…. Daytime traffic in kumeu is worst at the weekend, showing what the travel patterns are

In summary, the evaluation identified the following key differentiating factors considering access to open space:

- Scenario A is assumed to have a higher investment in walking and cycling infrastructure due to higher intensification levels and correspondingly the most improved access to open space.
- Scenario B and C are likely to be similar but with different extents of intensification and less investment in walking and cycling compared to the Scenario A so identified as minor positive.
- Scenario D is identified as a minor negative because although there will be opportunities to access open space, they will be less than other scenarios.

	Scenario A	Scenario B	Scenario C	Scenario D
Evaluation scores	+2	+1	+1	-1

Growth scenarios impact on water quality

#8530

Stormwater from the inner suburbs already regularly discharges raw sewage onto the eastern beaches.

You seem to be saying that building new subdivisions, and more future urban areas is likely to have a much worse impact, even though the whole idea is that new subdivisions can be designed from the ground up to reduce runoff, and to manage runoff more effectively (eg detention tanks). It's a lot more proven that this is possible (maybe provide a Hobsonville case study?) in the greenfield, than it is to concurrently intensify and resolve this issue in the brownfield. I see no hydrological model of the impact of covering gardens in terraces, and then doing planned water management within the existing city structure. Its unproven that you can execute what you plan

The chances are that scenario A and B are deeply negative, and scenario C and especially D are actually positive.

C and D in particular would reduce animal effluent going into rivers from pasture. Pasture also doesn't intercept water effectively. Detention tanks and temporary ponds can be easily designed into new greenfield areas to more effectively slow water movement than pasture does right now

Water quality

The following criterion for water quality was evaluated by subject matter experts by qualitative assessment.

The extent to which options reduce coastal and freshwater quality including the ability to swim safely and to collect shellfish due to beach closure from water pollution

Coastal and freshwater quality is affected by different types and sources of pollutants:

- sedimentation from stream bank erosion or land disturbance during construction;
- heavy metals from building materials and road traffic mobilised through stormwater run-off;
- E. coli and nutrients from rural land use or due to combined sewer overflows or in rural areas serviced by on-site wastewater systems.

In summary, the evaluation identified the following key differentiating factors for water quality:

- Greenfield growth and rural expansion would increase net imperviousness (stream bank erosion), sedimentation and heavy metal hence Scenario D would have a strong negative effect, with Scenario C, then Scenarios A and B having moderate and small negative effects respectively.
- While greenfield growth is better for E. Coli and nutrient pollution due to land use change from rural production to urban reducing sources of those contaminants, Scenario D is still considered to have strong negative effects overall.

At the evaluation workshop, there was general agreement on the draft scores. Key feedback was that all scenarios will need to improve the shading of streams to mitigate temperature increases as a result of climate change as a policy intervention.

	Scenario A	Scenario B	Scenario C	Scenario D
Evaluation scores	-1	-1	-2	-3

Reliable travel times:
“Most of Auckland’s spatial form already exists, and growth has limited influence”

#8530

- The growth scenarios report states that additional growth in the short to medium term is small relative to existing patterns, and has little observable influence over and above the larger weight of current travel patterns
    - This is because their scenarios A and B are forcing the development into walkable/public transit catchments.
    - It’s very important that the implementation of MDRS has no planning policy which forces this to happen, and current data on dwelling consent location doesn’t support the conclusion

- The statement that growth only reinforces existing travel patterns by adding more trips is dismissive of the impact.
    - Gridlock is a thing, and many areas of Auckland get gridlocked already
    - Have they modelled the maximum carrying capacity? Many suburban feeder roads and on-ramps are almost totally unusable at peak.
        - Eg Manukau road, Newmarket -> Gillies avenue onramp. Or Greenlane
        - To say that intensification has a limited impact on a system that’s close to gridlock relies on achieving fewer car journeys. Current placement of new developments is likely to disprove this assunption

- The inability for council to model traffic effectively can also be seen in the failure of the northwest development.
    - There is still a lot of empty land. Actually, % wise, the empty land makes a majority.
    - However the arrival of Costco already causes tailbacks onto state highway 16.
    - I have been stuck in gridlock in the carpark of Northwest mall for 2hours. The entire of the Costco area in northwest park became gridlocked from Gunton drive round. Then the carpark itself alongside countdown became gridlocked.
    - This shows that even with the current demand on the road layout, surges in demand are already able to cause the failure of the system despite only c 50% land-use
    - Given that this area was developed recently and the area remains largely empty lots at this stage, this is a clear data point indicating that the council’s current traffic models are not fit for purpose and that assumptions based upon them should be excluded from planning. If anything, areas of existing traffic problems should be used as evidence that the system is *unable* to cope with an increase in traffic, rather than the opposite

- Their model assumptions states, increased use of active modes.
    - They need to provide a scenario that honestly outlines what happens if terraces continue to be placed scattergun, off of walkable routes, as the data shows is currently happening

Future Development Plan 2023 #8532

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

SUBMISSION

Future Development Strategy Auckland

Submitter: Rayonier Matariki Forests

[redacted]

Consultant

[redacted]

[redacted]

General

1. This submission is made on behalf of Rayonier Matariki Forests (RMF). RMF owns and or manages 120,000 hectares of plantation forests in New Zealand. In the Auckland region it owns Mahurangi Forests and has forestry rights to Woodhill Forest replant, Riverhead Forest, and forests in the Hunuas. RMF also purchases the rights to harvest and sell logs from woodlots in the region. Harvested logs are supplied to local sawmills, to Whangarei Port and in containers to Auckland Port.

2. Forestry operations can be impacted by poor road access and by policies that allow for conflict between forestry operations and adjacent non rural productive land uses such as lifestyle and residential use.

3. The Auckland Rural Productivity Review 2022 notes that Forestry and Logging contribution to the Auckland total GDP was in 2022 just second ($74.2million) to horticulture and Fruit Growing ($83million). In our opinion the Future Development Strategy should ensure that Plantation Forestry along with other rural production land uses are supported and not impeded from continuing to contribute to the GDP of Auckland.

4. The concerns of RMF relate mainly to rural roading access to rural properties and to the potential of reverse sensitivity issues between forestry activities and non-rural production activities.

Specific issues

Rural Roading

Principal 3 (a) (b) and (c)

5. The principle appears to be focused on urban infrastructure. There needs to be specific reference to rural roads and the importance to enabling and supporting rural productive land uses. There are ongoing maintenance issues, such as cleaning out road tables and culverts and repairs from weather events. By not mentioning rural roading infrastructure the

principles are at odds with figure 2 on page 20. The figure is supported especially as the item for “best use of existing system” does not limit the principles to urban infrastructure.

6. Principle 3 (b) should be amended to add the following paragraph:

   “Existing rural roads support the rural productive land uses in l Auckland. Investment in upgrading and maintenance will be prioritised to ensure the efficiency of the existing transport corridors.”

Principle 4 (a)

Tree planting along roading corridors

7. It is not clear if the principle only relates to urban roads. It is not supported for rural roads. Powers lines are invariably located on the “road reserves” of roads. Trees and power lines are not easy partners in sharing of space. The latest consultation document from MIBE for the Review of the Electricity (Hazards from Trees) regulations 2023 advises that the power line works companies are seeking provisions for a fall distance between trees and their power lines. Their reason is based on incidents of power outage caused by falling trees. While urban areas may have more underground power this is not the case in the rural areas.

8. RMF only supports this principle if is limited to urban areas. The principle should be amended to make this clear.

Rural Areas section 4.2.3 limiting rural residential use.

9. RMF supports limiting rural residential growth to those area zoned rural lifestyle. The impact of reverse sensitivity issues, such as agricultural spraying, noise of rural machinery, heavy traffic, can not be underestimated as a negative impact on ongoing rural production land uses. The country lifestyle zones are mapped and known, and rural production land uses no longer must second guess where the threat of ad hoc subdivisions for lifestyle subdivisions may occur.

31 July 2023

Future Development Plan 2023 #8534

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Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Auckland Council
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Agent and Address for Service

Terra Nova Planning Ltd
[redacted]

Important privacy information

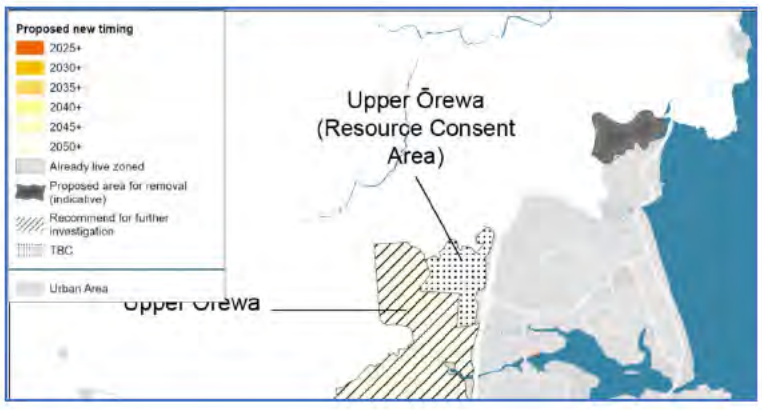
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Your Local Board: Hibiscus and Bays

This submission is for Edward Henderson Family Trust, the owner of a site at [redacted] who has given Terra Nova Planning Ltd the authority to lodge the submission on his behalf.

The site is zoned Future Urban in the Auckland Unitary Plan (AUP) and is 56ha approximately in area.

The Future Development Strategy proposes the site and other sites in the facility as "Proposed area for removal (indicative)". The maps from the strategy are below.

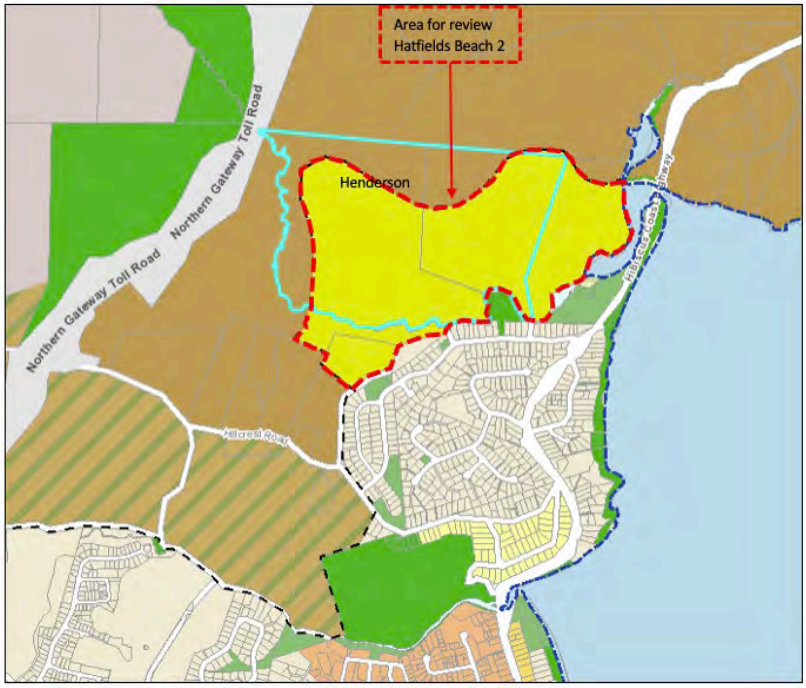




Your feedback

This submission relates to both general statements in the draft development strategy and to the Henderson site specifically (shown outlined in blue below), in addition to the adjoining FUZ sites affected.

The submission responds to the specific matters invited for comment and the summary of principles, way forward and future urban areas set out in the draft strategy.



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 with the objective to an extent, given the advantages in appropriate intensification of existing urban areas.

- However, there are significant issues to be resolved in further adding to the level of intensification already provided for within the AUP, particularly regarding the ability of services and transport infrastructure to support significant additional intensification as opposed to well-planned and located greenfield development.

- **The identification of the Henderson site and other land in the immediate vicinity currently zoned FUZ as a "proposed area for removal (indicative)" is OPPOSED.**

Tell us why.

- The concentration of much of Auckland's current and future population within existing urban areas is sensible from an overall sustainability approach, particularly in regard to the provision of transport and utility infrastructure. However, it is noted that reference to emissions, while currently of some relevance, is almost certainly going to be of much less relevance as alternative cleaner energy sources for both private and public transport evolve.

- The Proposed area for removal (indicative) recommendation for both the Henderson site and the adjoining sites with a FUZ is **opposed** as there is not a sound basis for it.

- The character and location of the Henderson site is entirely consistent with the overall objective of focused growth, accessibility to town centres, and public transport options.

- In relation to the Henderson and adjoining FUZ land, the draft strategy has identified flood plain and coastal inundation, and geotechnical / liquefaction constraints as the basis for removing a FUZ recommended by the IHP after hearing evidence on these matters, and adopted by Council, as part of the AUP process. The draft strategy states that[1]:

  Hatfields Beach 2

  The whole of the Hatfields Beach 2 is recommended for removal due to:

  - Significant hazard constraints, including approximately 30% of the FUA covered by the 1% AEP flood plain, which is wide in extent and will incur significant costs to appropriately mitigate. Approximately 30% of this FUA is also vulnerable to coastal inundation, which will be difficult and costly to appropriately mitigate. Due to the low-lying nature of areas abutting the coast, mean high water springs is likely to extend into the site under a high emissions scenario (2m sea level rise), unless hard defences are implemented.
  - A significant proportion of the FUA consists of alluvium / colluvium geology, where settlement risks may be present. Approximately 50% of the FUA has been identified as vulnerable to liquefaction damage. There is also a small area identified as being high risk of slope instability.

- The areas of flooding and coastal inundation affecting the land in general, and the Henderson specifically, are illustrated in the plan below from Auckland Council GIS. For context, the site in reference to the balance of the Orewa area is also shown.



[1] Page 25, Auckland Future Development Strategy 2023-2053. Future urban areas evidence report – for consultation



- Both geotechnical and flooding / coastal inundation issues were clear at the time of the AUP submission hearings and comprehensive engineering reports regarding both were presented to the IHP[2]. The constraints were concluded as being able to be addressed through comprehensive bulk earthworks and stormwater management works, as is outlined in more detail in the natural hazards section below.

- In all other respects, the site is a logical extension to the Hibiscus Coast, with transport and utility infrastructure that is either existing or under construction and capable of accommodating significant future urban growth as currently planned and provided for by the Auckland Plan and the AUP, with zoning to reflect that.

- There are no or few infrastructure limitations on maintaining the FUZ as it currently applies to the Henderson and other sites in the immediate vicinity to cater for the projected future population.

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 in principle; however, the proposed strategy is at odds with the Henderson land and other land that has been recommended for investigation.

[2] Rileys Engineering Assessment.pdf and Rileys Geotechnical constraints assessment .pdf

Tell us why.

- It is appropriate to recognise the importance of existing and future local centres for the reasons set out.

- The Henderson and other FUZ sites are close to the Orewa town centre, which is accessible by vehicles, buses, pedestrians and cycling, which was one of the reasons a FUZ was proposed and accepted by the IHP.

- Orewa Town Centre is 5 minutes by car, 15m by bus (including the walk to the Hibiscus Coast Highway) and 12 minutes by E-bike respectively from the Henderson site, and is 30 minutes by bus and 20 minutes by E-Bike to the Hibiscus Coast Station and Park-and-ride. These are realistic and achievable methods for many people, especially as connections and frequency improve.



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 in principle but consider the proposed approach lacks refinement given the fact that much land in Auckland will be subject to some degree of flooding, sea level rise, erosion in extreme events and geotechnical constraint. Often such effects can be avoided or mitigated with engineering design at development stage.

- **Oppose** the recommendation as it applies to the Henderson site and the other land in proximity being recommended 'Proposed area for removal (indicative)'. This land has already been investigated by the IHP and Council and found generally appropriate for urban development.

Tell us why.

- The Riley Consultants engineering reports submitted to the IHP in support of the Henderson submission to the Auckland Unitary Plan submission process confirm that the land is generally suitable for urban development.

8.0 Geotechnical Hazards and Remedial Measures

The low stability constraints zone is likely to comprise areas at low risk of slope instability, however, relatively small areas at risk may exist and specific geotechnical assessment will be required.

It is envisaged, within the low stability constraints zone, limited earthworks and remedial measures will be required for typical residential type development, although, for large developments requiring significant landform modification, greater geotechnical input and earthworks are likely to be required.

Development in the moderate to high stability constraints zone is likely to require increased remedial earthworks, specific to the site and proposed development. It is considered likely that some building sites could be identified within this zone, requiring little or no earthworks or stability improvement, subject to specific geotechnical assessment.

Key geotechnical hazards within the moderate to high stability constraints hazard zone, include steep slopes, marginally stable land where inappropriate development without remedial earthworks could trigger slope movement, slope failures, and potential for inundation.

It is important to note that earthworks are commonly carried out economically in the Auckland region for the purposes of ensuring slope stability to support residential development. We consider that the remedial earthworks likely to be required for this site should be consistent with those that have been carried out to stabilise sites with similar instability features elsewhere around the Auckland region.

- The IHP confirmed the Future Urban Zoning for this and other parts of Hibiscus Coast included the following statement in its recommendation to Council[3]:

2.4.1. Extensions at Hibiscus Coast

This extension includes land to the west, east and south of the existing urban area in order to provide for the continuation of the growth occurring at Hibiscus Coast and that expected from the improved link to the city from the approved State Highway 1 realignment from Puhoi through to Hibiscus Coast. That realignment will serve to reinforce the extent of the Rural Urban Boundary by providing a defined western and north-western edge defined by the resultant roading pattern.

The land areas forming the extension are readily developable, provide for substantial growth to meet demand and also provide options at Hibiscus Coast regarding where that growth can occur. The areas are contiguous with the existing urban development, thereby supporting the development of a compact urban form, and can be provided with the required infrastructure to support significant extensions to the settlement of Hibiscus Coast.

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[3] Page 12 IHP Report to AC- RUB rezoning and precincts 2016-07-22 https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/history-unitary-plan/ihp-designations-reports-recommendations/Documents/ihp016017080081changestorubrezoningprecincts.pdf

The extensions avoid areas identified as having significant values, those including Māori, natural character and landscape values along with areas affected by natural hazards.

There were submissions seeking additional land to be included within the Rural Urban Boundary but the Panel is of the view that the reasonably foreseeable future needs for urban growth at Hibiscus Coast are provided for in the extended 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?

- Agree with the approach in general terms.

Tell us why

- In some cases, alternative methods may achieve better overall environmental and engineering performance results and may enable development of otherwise appropriate land.
- This is often easier and more cost effective to achieve in greenfield situations than through intensification of existing areas, particularly where those areas are already highly developed and intensified, often with restricted opportunities for upgrading and lack of open space areas to assist in applying nature-based infrastructure solutions. The costs of retrospective resilience works will amount to billions of dollars and take many years, and probably decades to achieve.
- In respect of the Henderson property and other sites in the facility with a FUZ, such nature-based infrastructure can be appropriate, given the characteristics of the landholdings and the ability to plan for and implement such measures in a greenfield situation.

Other feedback

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

- Further comments below relate to the principles, way forward and future urban areas.

Principles for a quality compact approach to growth and change

Support greenhouse gas emission reduction – a compact urban form (greater density, mixed-use, limited urban expansion) reduces car dependency and vehicle kilometres travel by enabling people to live and work locally and choose walking and cycling. It is a critical requirement for low carbon and climate resilient development.

- Agree with this principle. Furthermore, Orewa is a significant centre and the Henderson and other properties immediately adjoining with the FUZ are appropriate and consistent with it.

- While the key focus of growth and intensification is appropriate for Auckland's key urban notes, the linear multi-nodal growth model that includes nodes such as Hibiscus Coast, and other nodes along the main transport route to them, is the most effective and efficient way of proceeding.

- A key factor in the success of this is to have **dedicated** bus (and rail routes), which have already been established and are being rolled out.

- With the use and development of more sustainable transport such as buses and trains and ferries, and non-fossil fuel powered private vehicles, the key routes north and south and to the north-west provide and excellent structure for multimodal development (sometimes described as "pearls on a string").

- Even with alternative fuel private vehicles, it is still important to reduce the number of private vehicle trips in terms of overall road congestion and safety goals, but with the provision of dedicated bus and rail routes and other tools, such as pricing, that objective can also be achieved, but without confusing the objectives and unnecessarily altering the growth pattern. This is particularly important in regard to some of the other matters addressed below.

Adapt to the impacts of climate change – as our climate changes, the frequency and severity of hazards will worsen. Where and how we plan for growth and adapt to these hazards is increasingly important. We will avoid further growth in areas exposed to significant hazards, integrate nature-based infrastructure and develop adaptation responses in areas at higher risk of natural hazards.

- This has been addressed above, noting that appropriate greenfield development can in many instances better apply nature-based infrastructure.

- While further intensification around the main nodes is important (and that is already generally provided for in the AUP - although modifications may well be appropriate), there are also downsides to over-intensification in terms of addressing climate change.

- For example, the provision of more extensive open space green areas and treescape within the main urban nodes to both help in absorbing stormwater and flooding, as well as providing cooling and shade for residents and workers in these areas.

- These factors should be key principles for climate change resilience, and the consequential outcome of this approach is to maintain the multi-modal development form currently being pursued and implicit in the AUP.

Make efficient and equitable infrastructure investments – infrastructure is expensive and takes significant time to plan and implement. We will take a regional view to infrastructure investment, make the best use of existing infrastructure and make investment decisions that deliver on multiple outcomes.

- Support this approach and consider that in many instances it is already been pursued.

- Significant and expensive and long-term upgrades to urban infrastructure within some of the existing urban nodes where it is proposed to further intensify will be required.

- Conversely, the Hibiscus Coast has infrastructure either already upgraded or well advanced and is designed with sufficient capacity to serve the projected longer-term population.

- This has been easier to achieve given the relatively less developed and lower density urban area.

Protect and restore the natural environment – the ecological health of the natural environment is critical to the success of urban spaces in Tāmaki Makaurau. Partnering with mana whenua and drawing from mātauranga Māori will enable greater outcomes. We will integrate, protect and restore the natural and built environment.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

Enable sufficient capacity for growth in the right place at the right time – most growth will occur within existing urban areas. The council must make choices about how it allocates limited funding across Tāmaki Makaurau. We will prioritise areas that deliver the greatest benefits, across multiple outcomes, for growth and investment. The Future Development Strategy provides for sufficient housing and business capacity over the next 30 years.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

Way forward

Strengthen nodes (the city centre, Albany, Westgate, and Manukau) – they play an important role in providing greater sub-regional sustainability. Significant and on-going investments and funding prioritisation are needed, though not necessarily in all nodes at the same time.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

Greater focus on neighbourhood sustainability – focused around strong centres, our neighbourhoods need to become more mixed-use and accessible by walking and cycling.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

- This can be easier to achieve in developing centres like the Hibiscus Coast given the relatively less developed existing urban area or more modern and better planned and engineered developed areas enabling this to be implemented as further growth occurs.

Identify areas more constrained by hazards – there are many locations affected by different types of hazards to various degrees. Locations which are highly constrained by hazards may be reduced in capacity depending on the outcomes of adaptation planning. Over time, forgone capacity will be offset by creating additional capacity in good locations elsewhere, so that overall capacity is broadly maintained.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

- The proposed approach needs to recognise that much land in Auckland will likely be subject to some degree of flooding, sea level rise, erosion and slips in extreme events.

- Rather than apply a blanket restriction approach to sites or land which are affected, it is more appropriate to provide for opportunities for pocket urban intensification within the areas that are free of hazards or can be made so, while leaving areas where houses exist for other uses such as open space, landscaping, and overland flow paths.

- Planning rules and standards (and zones) in areas with larger areas of potential inundation or instability need to be more flexible to permit clustered and higher density nodes rather than the application of blanket minimum site areas.

- It should be recognised that significant events could flood roads preventing thoroughfare for a limited period of time, and in such cases, resilience options should be investigated including alternative roads or at a minimum, walking and cycling opportunities.

- Where access to properties may potentially be restricted for short periods of time due to significant flooding events, that scenario should be included within property information files as a warning to people buying such properties.

Spatial prioritisation – investment needs to be prioritised in areas that will achieve the greatest benefits. Three types of spatial priorities will receive investment in line with their significance: nodes, local areas and communities and joint priorities between council and central government. There is more certainty in the short to medium-term (years 1-10) than in the long-term (years 11-30) where potential major projects offer significant changes and opportunities.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP, including the associated future urban land supply strategies and urban structure plans.
- Hibiscus Coast is an example of where both a future urban land supply strategy and strategic plans have set out the shape and timing of development and appropriate infrastructure.
- Given that there will always be changing circumstances over time, both future urban land supply strategies and the structure plans need to be applied in a practical way provided that the key performance measures are achieved and do not adversely impact on the development of other properties.

Future Urban Areas

Remove four areas for urban development because of hazard risk (in whole or in part) – many future urban areas are constrained by different types of hazards. The most hazard constrained parts will be re-zoned to an appropriate non-urban zoning.

- Oppose this identification regarding the Henderson and other sites in the immediate vicinity with a FUZ on the basis of the points raised above.
- These sites:
  - are close to and well served by public and private transport, which will be further improved as the land is developed and required multimodal transport links enhanced.
  - are close to the Orewa town centre and the other amenities of Orewa.
  - are served by and close to infrastructure services including water and wastewater.
  - have areas subject to varying degrees of potential instability and flooding, but have engineering and design solutions, including nature-based options, which can be implemented to enable the development of several hundred dwellings.

Identify areas for further investigation – areas with moderate exposure to hazards and other factors to consider such as VKT reduction and infrastructure delays will require further investigation to determine the appropriateness of these areas for urban development.

- No comment

Defer timing for development readiness – sequencing and timing of development is adjusted to reflect the realities of infrastructure funding and provision and the significant capacity in the existing urban area. New timings for many future urban areas have been proposed.

- The Henderson land and other land in the north-east sector can be **sequenced and timed for active zones at any time from 2024** given their proximity to the Orewa town centre, existing infrastructure subject to confirmation on wastewater services (which may require some deferment of the active zone being applied).
- These sites are relatively self-contained and can provide additional housing capacity in a relatively short time frame in a desirable location with little additional public expenditure being required. All of the costs of addressing the manageable land development constraints are carried by the developers.

Development timing based on infrastructure triggers – triggers relate to when all the required bulk infrastructure can be provided to ensure that any development is well- coordinated.

- Generally support. This is a logical and more efficient and effective methodology than arbitrary timeframes which may or may not be realistic based on whether infrastructure is actually delivered and what other events occur in the intervening period.

- In respect to the Henderson and other FUZ sites in the vicinity the only likely trigger of relevance will be the upgrading of water services, which at the time of the AUP hearing was identified as a matter requiring attention.

Part of region wide response to planning and infrastructure – urban and future urban priorities need to be considered together. Prioritisation needs to be based on what provides the most benefit for the whole region, rather than considering outcomes in isolation or in separate geographic areas.

- Generally support.

- In respect to the Henderson and other FUZ sites, little if any priority is required given the minimal upgrading of infrastructure needed to enable the land to be developed for residential purposes.

Future Development Plan 2023 #8537

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Auckland Council
Attention: Future Development Strategy
Freepost Authority 190153
Private Bag 92300, Victoria Street West
Auckland,1142

Name: [redacted]

[redacted]

Agent and Address for Service

Terra Nova Planning Ltd
Ref: Shane Hartley
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Important privacy information

The personal information that you provide in this form will be held and protected by Auckland Council in accordance with our privacy policy {available at **aucklandcouncil.govt.nz/privacy** and at our l braries and service centres) and with the Privacy Act 1993. The privacy policy explains how we can use and share your personal information in relation to any interaction you have with the council, and how you can access and correct that information. You should familiarise yourself with this policy before submitting this form.

Your Local Board: Rodney

This submission is for the Stevenson Family Trust, which owns land at Warkworth and has an interest in future growth of the town. The Trust has given Terra Nova Planning Ltd the authority to lodge the submission on its behalf.

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.

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

- Agree with the objective to an extent, given the advantages in appropriate intensification of existing urban areas.

- However, there are significant issues to be resolved in further adding to the level of intensification already provided for within the AUP, particularly regarding the ability of services and transport infrastructure to support significant additional intensification as opposed to well-planned and located greenfield development.

- The Trust **opposes** the identification of land in Warkworth as requiring further investigation.

Tell us why.

- The concentration of much of Auckland's current and future population within existing urban areas is sensible from an overall sustainability approach, particularly in regard to the provision of transport and utility infrastructure. However, it is noted that reference to emissions, while currently of some relevance, is almost certainly going to be of much less relevance as alternative cleaner energy sources for both private and public transport evolve.

- Disagree with the further investigation recommendation land in Warkworth as there is no sound basis for it.

- The character and location of currently zoned FUZ in Warkworth is entirely consistent with the overall objective of focused growth, accessibility to town centres, and public transport options.

- The draft strategy states that[1]:

Infrastructure

Transport infrastructure is not planned to support development in Warkworth North before 2035+, Warkworth West and South Central before 2040+ and Warkworth South Central, South East and North East before 2045+. There is no rapid transit network planned so this area would not contribute to vehicle kilometres travelled (VKT) reduction. Distance from the existing urban area, lack of rapid transit and lower opportunities for mode shift mean strategic outcomes are unlikely to be achieved. Wastewater infrastructure upgrades such as a new pipeline, pump station, wastewater treatment plant, outfall pipe and ancillary works are also required to support future growth.

Natural hazards and natural environment

Warkworth North East FUA has moderate hazard constraints, including approximately 8% of the FUA within the 1% AEP floodplain, and a small section at the southern end of the FUA bordering the Mahurangi River that is at risk of coastal inundation. The whole FUA is in an area of moderate-risk slope instability.

Watercourses in the area tend to be of high natural and ecological value. To the south of the North East FUA, the Mahurangi River is scheduled as a "Natural Stream Management Area" and is bordered on its northern edge by a mixture of kauri, podocarp broadleaf forest and kahikatea forest which are also scheduled as Significant Ecological Areas (SEAs). These SEAs run along the southern border of the FUA and also extend north into the FUA along two of the tributaries of the Mahurangi River. There are also patches of the same forest types (although not scheduled) extending further along the westernmost tributary.

In this respect, Warkworth is an existing urban area, with transport and utility infrastructure that is either existing or under construction and capable of accommodating significant future urban growth for an additional 20,000+ people as currently planned and provided for by the Auckland Plan and the AUP, with zoning to reflect that.

This includes:

- The current upgrading of the **wastewater network and treatment facilities** involving Warkworth and Snells Beach is well advanced and scheduled to be completed by 2025, if not earlier.

- The **water supply system** including its source and network has similarly been designed and constructed to cater for the projected future population.

- The **Puhoi to Warkworth motorway** is open, and there is a new **Park-and-ride transport centre** to the south of the motorway on the old State Highway opposite Hudson Road.

[1] Page 25, Auckland Future Development Strategy 2023-2053. Future urban areas evidence report – for consultation

- Land for employment, retail and commercial services, and education facilities has been identified and zoned for the projected future population. Much of this land has been already developed, is under development or consented.

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 in principle; however, the proposed strategy is at odds with land with a FUZ that has been recommended for investigation.

Tell us why.

- It is sensible to recognise the importance of existing and future local centres for the reasons set out.
- In respect to Warkworth, there is an existing central town centre that is easily accessible for residents using both private and public transport. Public transport serves the town centre, and the provision of parking opportunities for vehicles within the town centre and the surrounding streets is assisted by the historical grid pattern.
- The character of the street system also enables relatively safe movement by both pedestrians, ability scooters and cyclists, particularly cyclists with E bikes.
- The adopted Warkworth Structure Plan also provides for the future development and extension of cycle/pedestrian links between the town centre and surrounding residential areas.
- The developed and planned commercial nodes in other parts of Warkworth are equally as accessible to the same transportation forms. This has been assisted by the recent opening of the **Puhoi to Warkworth motorway, and the Matakana Link Road (MLR)**.
  - The first has removed significant through traffic which allows for slower and safer transport and movement throughout the town.
  - The second has had a similar effect, while also incorporating multi-transport options. Provision of vehicle, cycle and pedestrian lanes, including connections to the significant light industrial and commercial employment and service activities to the north.
- FUZ sites are either very close to or within easy distance of to the Warkworth town centre which is accessible by vehicles, pedestrian and cycling.

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 in principle but consider the proposed approach lacks refinement.
- Oppose FUZ land being recommended 'for investigation'. This land already been investigated by the IHP and Council and found appropriate for urban development.

Tell us why.

- Much land in Auckland will be subject to some degree of flooding, sea level rise, erosion and slips in extreme events, and the proportion of sites so affected will vary. Often such effects can be avoided or mitigated with engineering design at development stage.

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 with the approach in general terms.

Tell us why

- In some cases, alternative methods may achieve better overall environmental and engineering performance results and may enable development of otherwise appropriate land.
- This is often easier and more cost effective to achieve in greenfield situations than through intensification existing areas, particularly where those areas are already highly developed and intensified, often with restricted opportunities for upgrading and lack of open space areas to assist in applying nature-based infrastructure solutions.
- In respect of the FUZ land in Warkworth, such nature-based infrastructure can be appropriate, given the characteristics of the landholdings and the ability to implement such measures in a greenfield situation.

Other feedback

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

- Further comments below relate to the principles, way forward and future urban areas.

Principles for a quality compact approach to growth and change

Support greenhouse gas emission reduction – a compact urban form (greater density, mixed-use, limited urban expansion) reduces car dependency and vehicle kilometres travel by enabling people to live and work locally and choose walking and cycling. It is a critical requirement for low carbon and climate resilient development.

- Agree with this principle. Furthermore, the inclusion of Warkworth as a growth node and the properties with a FUZ are appropriate and consistent with it.

- While the key focus of growth and intensification is appropriate for Auckland's key urban notes, the linear multi-nodal growth model that includes nodes such as Warkworth and Pukekohe, and other nodes along the main transport route to them, is the most effective and efficient way of proceeding.

- A key factor in the success of this is to have **dedicated** bus (and rail routes), which have already been established and are being rolled out.

- With the use and development of more sustainable transport such as buses and trains and ferries, and non-fossil fuel powered private vehicles, the key routes north and south and to the north-west provide and excellent structure for multimodal development (sometimes described as "pearls on a string").

- Even with alternative fuel private vehicles, it is still important to reduce the number of private vehicle trips in terms of overall road congestion and safety goals, but with the provision of dedicated bus and rail routes and other tools, such as pricing, that objective can also be achieved, but without confusing the objectives and unnecessarily altering the growth pattern. This is particularly important in regard to some of the other matters addressed below.

Adapt to the impacts of climate change – as our climate changes, the frequency and severity of hazards will worsen. Where and how we plan for growth and adapt to these hazards is increasingly important. We will avoid further growth in areas exposed to significant hazards, integrate nature-based infrastructure and develop adaptation responses in areas at higher risk of natural hazards.

- This has been addressed above, noting that appropriate greenfield development can in many instances better apply nature-based infrastructure.

- While further intensification around the main nodes is important (and that is already generally provided for in the AUP - although modifications may well be appropriate), there are also downsides to over intensification in terms of addressing climate change.

- For example, the provision of more extensive open space green areas and treescape within the main urban nodes to both help in absorbing stormwater and flooding, as well as providing cooling and shade for residents and workers in these areas.

- These factors should be key principles for climate change resilience, and the consequential outcome of this approach is to maintain the multi-modal development form currently being pursued and implicit in the AUP.

Make efficient and equitable infrastructure investments – infrastructure is expensive and takes significant time to plan and implement. We will take a regional view to infrastructure investment, make the best use of existing infrastructure and make investment decisions that deliver on multiple outcomes.

- Support this approach and consider that in many instances it is already being pursued.

- Significant and expensive and long-term upgrades to urban infrastructure within some of the existing urban nodes where it is proposed to further intensify will be required.

- Conversely, Warkworth has infrastructure either already upgraded or well advanced and is designed for insufficient to serve the projected longer-term population.

- This has been easier to achieve given the relatively less developed and lower density urban area.

Protect and restore the natural environment – the ecological health of the natural environment is critical to the success of urban spaces in Tāmaki Makaurau. Partnering with mana whenua and drawing from mātauranga Māori will enable greater outcomes. We will integrate, protect and restore the natural and built environment.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

Enable sufficient capacity for growth in the right place at the right time – most growth will occur within existing urban areas. The council must make choices about how it allocates limited funding across Tāmaki Makaurau. We will prioritise areas that deliver the greatest benefits, across multiple outcomes, for growth and investment. The Future Development Strategy provides for sufficient housing and business capacity over the next 30 years.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

Way forward

Strengthen nodes (the city centre, Albany, Westgate, and Manukau) – they play an important role in providing greater sub-regional sustainability. Significant and on-going investments and funding prioritisation are needed, though not necessarily in all nodes at the same time.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

Greater focus on neighbourhood sustainability – focused around strong centres, our neighbourhoods need to become more mixed-use and accessible by walking and cycling.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

- This can be easier to achieve in smaller growth nodes like Warkworth given the relatively less developed and lower density urban area enabling this to be implemented as growth occurs.

- The adopted Warkworth structure plan identifies a network of centres and existing or proposed walking and cycling access routes. The development of this network is intrinsic to the projected future growth and population, including the currently FUZs.

Identify areas more constrained by hazards – there are many locations affected by different types of hazards to various degrees. Locations which are highly constrained by hazards may be reduced in capacity depending on the outcomes of adaptation planning. Over time, forgone capacity will be offset by creating additional capacity in good locations elsewhere, so that overall capacity is broadly maintained.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

- The proposed approach needs to recognise that much land in Auckland will likely be subject to some degree of flooding, sea level rise, erosion and slips in extreme events.

- Rather than apply a blanket restriction approach to sites or land which are affected, it is more appropriate to provide for opportunities for pocket urban intensification within the areas that are free of hazards or can be made so, while leaving areas where houses exist for other uses such as open space, landscaping and overland flow paths.

- Planning rules and standards (and zones) in areas with larger areas of potential inundation or instability need to be more flexible to permit clustered and higher density nodes rather than the application of blanket minimum site areas.

- It should be recognised that significant events could flood roads preventing thoroughfare for a limited period of time, and in such cases, resilience options should be investigated including alternative roads or at a minimum, walking and cycling opportunities.

- Where access to properties may potentially be restricted for short periods of time due to significant flooding events, that scenario should be included within property information files as a warning to people buying such properties.

Spatial prioritisation – investment needs to be prioritised in areas that will achieve the greatest benefits. Three types of spatial priorities will receive investment in line with their significance: nodes, local areas and communities and joint priorities between council and central government. There is more certainty in the short to medium-term (years 1-10) than in the long-term (years 11-30) where potential major projects offer significant changes and opportunities.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP, including the associated future urban land supply strategies and urban structure plans.

- Warkworth is an example of where both a future urban land supply strategy and the Warkworth Structure Plan have set out the shape and timing of development and appropriate infrastructure.

- Given that there will always be changing circumstances over time, both future urban land supply strategies and the structure plans need to be applied in a practical way provided that the key performance measures are achieved and do not adversely impact on the development of other properties.

Future Urban Areas

Remove four areas for urban development because of hazard risk (in whole or in part) – many future urban areas are constrained by different types of hazards. The most hazard constrained parts will be re-zoned to an appropriate non-urban zoning.

- No comment

Identify areas for further investigation – areas with moderate exposure to hazards and other factors to consider such as VKT reduction and infrastructure delays will require further investigation to determine the appropriateness of these areas for urban development.

- Oppose this identification in regard to FUZ in Warkworth on the basis of the points raised above.

Defer timing for development readiness – sequencing and timing of development is adjusted to reflect the realities of infrastructure funding and provision and the significant capacity in the existing urban area. New timings for many future urban areas have been proposed.

- Oppose the alteration of the development status of the land in the north-east sector from 2033-2037 to 2045+ as:

  - The basis for this is flawed, being largely based on the finding that transport infrastructure is not planned to support development in Warkworth until 2035 at the earliest and North-East Warkworth before 2045.

  - Warkworth is already a significant sub-regional Centre serving northern Rodney and southern Kaipara District.

- The potential under existing zones for additional commercial and industrial activity has not been adequately recognised. For example, there is more than 60 ha of land in northern Warkworth that has an operative Light Industry Zone and subdivision for light industry sites has been approved.

- Northern Warkworth has a very high standard of transport infrastructure now that the Puhoi to Warkworth motorway and the Matakana Link Road are open.

- More frequent public transport supply can be easily introduced on an 'as required' basis directly related to demand given the capacity of the Puhoi to Warkworth motorway and the unlikely need – other than in the very long-term - for any dedicated bus lane.

- Residential land necessary to support the employment land now provided for under active zonings is necessary, as was fully examined during the AUP process.

- Taking the above into account, even the currently schedule sequences and timings for active zones were overly conservative.

Development timing based on infrastructure triggers – triggers relate to when all the required bulk infrastructure can be provided to ensure that any development is well- coordinated.

- Generally support. This is a logical and more efficient and effective methodology than arbitrary timeframes which may or may not be realistic based on whether infrastructure is actually delivered and what other events occur in the intervening period.

Part of region wide response to planning and infrastructure – urban and future urban priorities need to be considered together. Prioritisation needs to be based on what provides the most benefit for the whole region, rather than considering outcomes in isolation or in separate geographic areas.

- No comment

Future Development Plan 2023 #8538

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Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

See attachment

July 2023

To Auckland Council,

Please find attached DPA's submission on Future Development Strategy

For any further inquiries, please contact:

Chris Ford
Regional Policy Advisor (Local Government)
Acting Kaituitui – Wellington Region
policy@dpa.org.nz

Introducing Disabled Persons Assembly NZ

We work on systemic change for the equity of disabled people

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People's Organisation run by and for disabled people.

We recognise:

- Māori as Tangata Whenua and Te Tiriti o Waitangi as the founding document of Aotearoa New Zealand;
- disabled people as experts on their own lives;
- the Social Model of Disability as the guiding principle for interpreting disability and impairment;
- the United Nations Convention on the Rights of Persons with Disabilities as the basis for disabled people's relationship with the State;
- the New Zealand Disability Strategy as Government agencies' guide on disability issues; and
- the Enabling Good Lives Principles, Whāia Te Ao Mārama: Māori Disability Action Plan, and Faiva Ora: National Pasifika Disability Disability Plan as avenues to disabled people gaining greater choice and control over their lives and supports.

We drive systemic change through:

- **Leadership:** reflecting the collective voice of disabled people, locally, nationally and internationally.
- **Information and advice:** informing and advising on policies impacting on the lives of disabled people.
- **Advocacy:** supporting disabled people to have a voice, including a collective voice, in society.
- **Monitoring**: monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

UN Convention on the Rights of Persons with Disabilities

DPA was influential in creating the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), a foundational document for disabled people which New Zealand has signed and ratified, confirming that disabled people must have the same human rights as everyone else. All state bodies in New Zealand, including local and regional government, have a responsibility to uphold the principles and articles of this convention. There are a number of UNCRPD articles particularly relevant to this submission, including:

Article 3 – General principles

Article 9 – Accessibility

Article 19 – Living independently and being included in the community

Article 9 refers to the obligation for States parties to identify and eliminate obstacles and barriers to accessibility, including "buildings, roads, transportation and other indoor and outdoor facilities".[1]

Article 30 – Participation in cultural life, recreation, leisure and sport

New Zealand Disability Strategy 2016-2026

Since ratifying the UNCRPD, the New Zealand Government has established a Disability Strategy[2] to guide the work of government agencies on disability issues. The vision is that New Zealand be a non-disabling society, where disabled people have equal opportunity to achieve their goals and aspirations, and that all of New Zealand works together to make this happen. It identifies eight outcome areas contributing to achieving this vision. There are a number of Strategy outcomes particularly relevant to this submission, including:

Outcome 5 – Accessibility

The Submission

DPA welcomes this opportunity to engage on the Auckland Council Future Development Strategy being proposed by Auckland Council.

DPA sees this future strategy (and others around the country) as presenting an opportunity to plan for the growth of our main urban centres, with Tāmaki Makaurau/Auckland facing huge challenges being the largest city in the country and with significant population growth projected to continue.

For disabled people, accessibility is not just seen as an add on but an essential component of planning for Auckland's growth over the next 30 years.

According to the 2013 Statistics New Zealand Disability Survey one in four New Zealanders have a disability or long-term health condition. Māori and Pacific peoples have an even higher-than-average rate of disability. There were approximately 271,000 disabled people residing in Auckland in that year (the latest data available), a number which rises to over 300,000 when accounting for current population increase.[1]

The number of disabled people in Auckland's population is projected to increase (along with the rest of the country) by 2053 due to the high incidence of ageing within the population, amongst other factors.

DPA believes that building an inclusive Auckland where everyone, including disabled people can fully participate in their communities without barriers should be the overriding objective of Auckland Council in terms of this plan.

Our submission and recommendations will cover the following main areas outlined in the consultation survey form:

- Focusing growth
- Accessible local centres
- Avoiding hazards (climate related)
- Resilient infrastructure

[1] Statistics New Zealand. (2013). New Zealand Disability Survey. Retrieved from http://archive.stats.govt.nz/browse_for_stats/health/disabilities/DisabilitySurvey_HOTP2013.aspx#gsc.tab=0 5

DPA Auckland members contributed their views to this submission.

We will briefly background the main challenges facing disabled people in terms of housing, transport, climate change and infrastructure.

1.) Background

a.) Housing

The housing situation for disabled people is currently still dire in Tāmaki Makaurau as much as it is around the country.

For this reason, disabled people are one group who are disproportionately impacted by homelessness. This is due to disabled people being overrepresented amongst low-income earners while also facing higher living costs due to disability. For this reason, disabled people are more likely to be renters; 2018 data from Statistics New Zealand shows that 47% of disabled people rent compared to 35% of non-disabled people.[2]

Disabled people are also at greater risk of homelessness due to the lack of security around ongoing tenancy and this is exacerbated by the low number of accessible houses not only in Auckland but throughout the country.

However, as this Future Development Plan looks out to 2053, we have an expectation that during this period, central government will (at some point) be persuaded to legislate for housing design standards to focus on universal design, meaning that disabled people as well as everyone else will be able to live in homes that are both accessible and usable across their natural lifespans.

As we will elaborate in the body of our submission, the main challenge to housing accessibility arises from orienting spatial planning away from planning for urban sprawl towards the creation of more compact communities instead.

b.) Transport

[2]Statistics New Zealand. (2018). The disability gap 2018. Retrieved from https://www.stats.govt.nz/infographics/the-disability-gap-2018/#:~:text=Home%20life-,Of%20disabled%20New%20Zealanders%20aged%2015%E2%80%9364%20years%20in%202018,percent%20of%20non%2Ddisabled%20people.

Earlier this year we submitted on the Auckland Council's Future Transport Projects plans. In that submission, we outlined how disabled people are highly reliant on public transport given the significant proportion of disabled people who don't drive.

Nevertheless, provision needs to be made as part of the Auckland Future Development Strategy to accommodate the transport needs of all disabled people and this includes for those who transport themselves via different modes including driving, bussing, walking, cycling, using taxis and trains.

In 2022, Waka Kotahi published independently commissioned research (in which DPA collaborated) entitled *Transport experiences of disabled people in Aotearoa New Zealand*. [3]

This research illustrated the ongoing accessibility challenges faced by disabled people when using public transport. Disabled people's main challenges included, for example, issues around using Total Mobility (TM), the inaccessibility of bus services, lack of footpaths and safe crossing points, and feeling excluded from the planning of sustainable city centres, as well as the disablist attitudes of some transport planners.[4]

Disabled people also have ongoing issues with accessing train and ferry services in Auckland and the need for improved transport accessibility and affordability[5], including for disabled people, will be key to ensuring the success of urban planning efforts going forward to 2053.

When undertaking future transport planning activities, Auckland Council should ensure that TM is a key component for disabled people as this gives the disabled community who are eligible for it the ability to access their community.

[3]Doran, B., Crossland, K., Brown, P., & Stafford, L. (2022). Transport experiences of disabled people in Aotearoa New Zealand (Waka Kotahi NZ Transport Agency research report 690). Retrieved from https://www.nzta.govt.nz/resources/research/reports/690

[4] Kelly-Costello, A. (2023, June 30). Putting a blind-friendly transport system on the agenda. Blind Citizens New Zealand. https://abcnz.org.nz/uncategorized/putting-a-blind-friendly-transport-system-on-the-political-agenda/

[5] Affordability is an issue for many disabled people in Auckland given that the current Total Mobility maximum fare cap is $40, which is hardly sufficient for personal travel across great swathes of the region.

DPA also recommends that the existing maximum fare cap needs to be adjusted annually to keep pace with inflation, so that disabled people can access journeys to both existing and newer communities within the Auckland region.

Recommendation 1: that Auckland Council should ensure that TM is viewed as a key transport component for disabled people in all transport planning activities.

Recommendation 2: that Auckland Council adjusts the TM maximum fare cap annually by the rate of inflation.

c.) Climate change

The disabled community are already being severely hit by the impacts of climate change and are expected to be one of the hardest hit population groups going forward, locally, nationally and internationally.[6]

DPA found that after reaching out to our members in Auckland following the recent weather events that while many disabled people were resilient and had withstood the floods well, others had not as we heard stories about the impact that weather-enforced homelessness had on disabled people, especially given the lack of accessible housing.[7]

DPA welcomes the focus on avoiding hazards, especially those which are climate related, as part of this plan. We recognise that it is clear after the recent flooding events that there are areas which will likely be red zoned as not suitable for building due to natural and geological hazards by either Auckland Council and/or central government following the introduction of new planning legislation.

[6]Schulte, C. (2020, March 28). People With Disabilities Needed in Fight Against Climate Change. Retrieved from https://www.hrw.org/news/2020/05/28/people-disabilities-needed-fight-against-climate-change#:~:text=People%20with%20disabilities%20are%20at,said%20in%20a%20recent%20report.

[7] Shivas, O. (2023, February 4). 'Life or death' for disabled people caught in Auckland floods, improvements needed. *Stuff.* https://www.stuff.co.nz/auckland/local-news/131128910/life-or-death-for-disabled-people-caught-in-auckland-floods-improvements-needed

Some red zoning will likely affect areas which have a flat topography that otherwise makes settling in these areas very attractive to disabled people, especially those with mobility impairments. The fact that formerly suitable areas will become out of bounds for house building and settlement activity or even face managed retreat means that disabled people need to be fully involved in discussions about these possibilities, which we will elaborate on further within this submission.

d.) Infrastructure

DPA believes that accessible community infrastructure needs to be put in place across the board.

For disabled people, this includes infrastructure such as footpaths, roads, parks, rail, bus and ferry services, all of which will support both existing and new communities across Auckland.

We will talk further in this submission about the need to have all infrastructure designed and built to universal design standards.

2.) Auckland's Future Development Strategy – a disability perspective

a.) Focusing growth

While DPA welcomes the development of more compact, accessible communities, there are still several issues needing to be resolved for this to happen successfully, especially for disabled people.

Firstly, there is the need for the Building Code and other associated legislation to change to make the growing number of high-rise apartments and dwellings necessitated by this policy fully accessible and the goal of fully accessible communities possible.

Currently, under the Building Code, builder owners/developers are not legally required to have accessibility features, including lifts, installed in private dwellings (i.e., houses and business premises) if they are less than three floors in height.[8]

In the absence of any changes to the Building Code for even part of the timeframe of this plan, Auckland Council will need to incentivise private, government and non-government organisation developers through capital contributions to build apartments and more compact housing to Lifemark Universal Design (UD) standards, especially in the areas being signalled for infrastructural upgrades. The use of capital contributions will also help offset any additional costs involved.

Recommendation 3: that Auckland Council incentivise the building of more compact, accessible to Lifemark UD standards houses and public buildings through capital contributions.

According to one of DPA's members, more of Auckland's disabled people, as well as their families and whānau, have moved to locations which have cheaper rental properties including Waiuku, Pukekohe, Warkworth, Puhoi, and Helensville over the last 10 years.

The member also related that in their view none of the community infrastructural upgrades proposed in this plan are not based in these locations. For this reason, strategic planning and investment needs to flow to the communities where disabled people are increasingly settling as well as to existing communities.

Secondly, this means the need for Auckland Transport to provide fully accessible transport options including rail, ferries, buses and other on-demand transport services for everyone, including disabled people, both to and from wherever they live within the region. If this is done, then disabled people in the abovementioned and

[8] Pringle, T. (2018, December 1). Going up and down. *Build 169*. https://www.buildmagazine.org.nz/index.php/articles/show/going-up-and-down#:~:text=3%20(which%20differs%20from%20D1,required%20to%20a%20reception%20area

other locations around Auckland will be able to easily access the city and its environs in the future.

Recommendation 4: that strategic planning should include investment in improving accessibility everywhere within the Auckland region.

Recommendation 5: that Auckland Transport ensure that accessible transportation options are prioritised enabling the connection of disabled people with the upgraded centres.

b.) Accessible local centres

DPA supports the concept of having accessible, compact local centres (known as 20-minute cities/towns) where people live in communities where their work, essential services, schools, healthcare, recreational opportunities and retail outlets are based within 20 minutes of where they live.

DPA recognises the importance of building more compact, accessible communities which enable the building of greater social connections and cohesion while simultaneously aiming to reduce carbon emissions through more readily available public transport options leading to the reduction of long commutes.

Disabled people would benefit from having more compact communities given that great numbers of us experience social marginalisation, isolation and loneliness within the more sprawled out communities we presently live in.

However, for more compact communities to work for us housing, transport and infrastructure need to be fully accessible.

DPA believes that the best way to ensure that all infrastructure including housing, public buildings, schools, footpaths and transport systems are fully accessible is that Universal Design Standards (at least to level 5) are fully written into the development strategy so that they are understood by all stakeholders including builders, developers, planners and architects, amongst others.

Recommendation 6: that Council fully incorporate Universal Design Standards (at least to level 5) within the Future Development Strategy to ensure accessibility.

All communities in Auckland should be suitable for every disabled person to live in too, and this includes people with mobility impairments, blind and low vision people, neurodiverse people (i.e., Autistic people), people with psychosocial disabilities/mental distress and Deaf/deaf communities.

This can be achieved through having accessible wayfinding signage in public spaces/places, quiet spaces where people can retreat to in busy areas (which are suitable for neurodiverse people and people experiencing mental distress), accessible bus stops, mobility parking and vehicle drop off areas, appropriate seating where people can sit and rest as well as good lighting and security features.

Building infrastructure to UD standards should support the building of accessible, inclusive communities but more detail needs to be included in the final strategy as to how.

Most importantly, building fully accessible, inclusive communities has to be underpinned by the undertaking of extensive barrier free accessibility audits in areas where infrastructural improvements are being mooted under this strategy.

Recommendation 7: that Auckland Council undertake barrier free audits in areas where infrastructure improvements are planned.

c.) Avoiding hazards (climate related)

DPA acknowledges the need to manage development around the threats posed by climate change and significant natural hazards including earthquake faults and dormant volcanoes.

DPA supports the proposition that known areas which present a natural hazard risk due to natural and climatic risks should be re-assessed to see whether future development is viable.

DPA is also supportive of the idea that where development has already been approved in potentially vulnerable areas that investigation be undertaken into appropriate actions to mitigate the risks that present from this.

We say this as we know of disabled people in the Auckland area who have had to leave accessible housing because of the recent weather events. Our concerns have been further compounded by reports that social housing providers, such as Kainga Ora, could be planning housing developments in flood prone areas, some of which will contain much needed accessible housing.

This means that if new, accessible housing is constructed in high-risk areas, there is the potential for any units to be severely damaged or destroyed, rendering them uninhabitable, perhaps only a short time after first being moved into by disabled people; after having undergone (in many cases) a long wait for them.

DPA would like to see these stressful scenarios for disabled people avoided through good, effective involvement in all aspects of development planning by local communities in the Auckland region under this strategy.

DPA believes that it is inappropriate for land which is deemed to be at high risk from natural hazards including flooding and sea level rise to have new buildings or development on them without full consideration about how the risks to local communities and their residents can be managed.

Recommendation 8: that Auckland Council review the appropriateness of allowing new house and commercial building activity in areas deemed at high risk of damaging flooding or sea level rise.

Post any reviews, there should be managed retreat from areas which are assessed as being prone to a high level of climate related risks that cannot be mitigated, and this includes from things such as damaging flooding or other natural hazard hazards.

In these circumstances, many disabled and older people will need to be transitioned away from high-risk areas to (hopefully) less risky but still accessible ones as part of any managed retreat strategies.

In the medium to long-term, this will require Auckland Council and central government to partner with disabled people and disability organisations as part of community co-design efforts to successfully plan these types of transitions.

Recommendation 9: that Auckland Council partner with disabled people, tangata whaikaha/whānau hauā and disability organisations to plan any managed retreat from existing communities that are at high risk from climate related natural hazards.

d.) Resilient infrastructure

DPA supports the creation of resilient, nature-based infrastructure as one means of providing an active defence against the risks of climate change. Ideas such as gardens, swales, and detention basins are just some of the ones that we agree with.

Undertaking this type of natural infrastructure creation might mitigate the need for managed retreat, meaning that as few people as possible will be impacted by this.

It will also mean that the homes, schools, training establishments and businesses of Auckland will be more protected from future climate change produced events.

Future Development Plan 2023 #8540

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Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

#8540

Blind Citizens NZ

31 July 2023

Auckland Branch
2/13 Upland Road
Remuera
Auckland 1050
Phone +64 9 520 4242
Mobile +64 21 983 652
Web www.abcnz.org.nz
Email mary@lansink.co.nz

Auckland Council
Email
futuredevelopmentstrategy@aucklandcouncil.govt.nz

Submission from Auckland Branch Blind Citizens NZ re Auckland Future Development Strategy

Introducing the Auckland Branch of Blind Citizens NZ

1. Founded in 1945, Blind Citizens NZ is the oldest disability consumer advocacy group – disabled people's organisation – in New Zealand. We write on behalf of blind, deafblind and vision impaired members of the Auckland Branch. Our members are proud to be Aucklanders and we accept and enjoy our responsibilities to participate in our community as much as we can.

2. New Zealand signed the United Nations Convention on the Rights of Persons with Disabilities (Disability Convention) in 2007 and ratified it in 2008. The purpose of the Disability Convention is to promote, protect, and ensure universal human rights and fundamental freedoms for disabled people, and promote respect for their dignity. It recognises the right of disabled people to make free and informed decisions about their own lives. It sets out in practical terms how the rights of disabled people can be realised. All rights discussed in the Disability Convention are also established in current New Zealand law. Local government, including Auckland Council and its council-controlled organisations, is bound to honour the Disability Convention.

3. The Disability Convention articles most relevant to our submission are:
- Article 4.3 Involving disabled people and our organisations in decisions that affect us;
- Article 9: Accessibility;
- Article 19: Living independently and being included in the community;
- Article 20: Personal mobility;
- Article 21: Freedom of expression and opinion, and access to information;
- Article 28: Adequate standard of living and social protection;
- Article 30: Participation in cultural life, recreation, leisure and sport.

4. The New Zealand Government policies and strategies which are relevant to this submission include:
• New Zealand Disability Strategy 2016-2026:
Outcome 3 - Health and wellbeing;
Outcome 5 - Accessibility.

The Auckland Branch Submission

5. We appreciate the opportunity to make this brief submission about this 30-year high-level strategy.

6. The Auckland Branch does not comment on potential changes to council revenue. This is because we don't have a clear view from the majority of members. However, we are very aware that most of our members have low incomes and they will be gravely disadvantaged by any service reductions or price hikes in services.

7. We have read and strongly support the detailed submission from Auckland members of Disabled Persons Assembly NZ (DPA).

8. We agree with the aims:
• to focus development near local centres giving people easier access to work, services, facilities and shops by walking, cycling and public transport;
• to avoid further growth in areas which are exposed to significant risk of environmental hazards;
• to prioritise nature-based infrastructure that responds to the impacts of climate change.

9. However, we are very nervous about current and potentially future examples of housing and other infrastructure that do not follow Universal Design standards that meet the needs of everyone.

10. Council can expect the Auckland Branch to continue to argue in favour of good design, implementation and monitoring of infrastructure to meet the needs of all Aucklanders.



Mary Schnackenberg

Hon. Secretary, Auckland Branch
Blind Citizens NZ

Future Development Plan 2023 #8541

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please refer to the attachment

#8541

31 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

This Feedback details the submitter, the land with which they have an interest and responds to the provisions of the FDS in both broad and specific ways including addressing the matters that Auckland Council has invited specific feedback on the Have Your Say webpage.

Submitter Details

This feedback is provided on behalf of:	Red Rhino Consultants Limited and Airport Rent A Car Limited
Property Interest:	[redacted] Glenvar Ridge Road, Long Bay

Address for Service

Name:	The Planning Collective Attention: Diana Bell
Email Address:	[redacted]
Phone:	[redacted]

Property Details

The submitter has a particular interest in the land at [redacted] Glenvar Ridge Road, Long Bay. Refer to the aerial photograph in Figure 1 below.

The land comprises approximately 20-ha of greenfield land. The land is situated on the periphery of the existing Long Bay urban area currently undergoing conversion from low-density to medium density, and in some areas, high density, housing. The land has a southern boundary frontage to Glenvar Ridge Road and is characterised by undulating topography sloping northwards towards Vaughans stream.

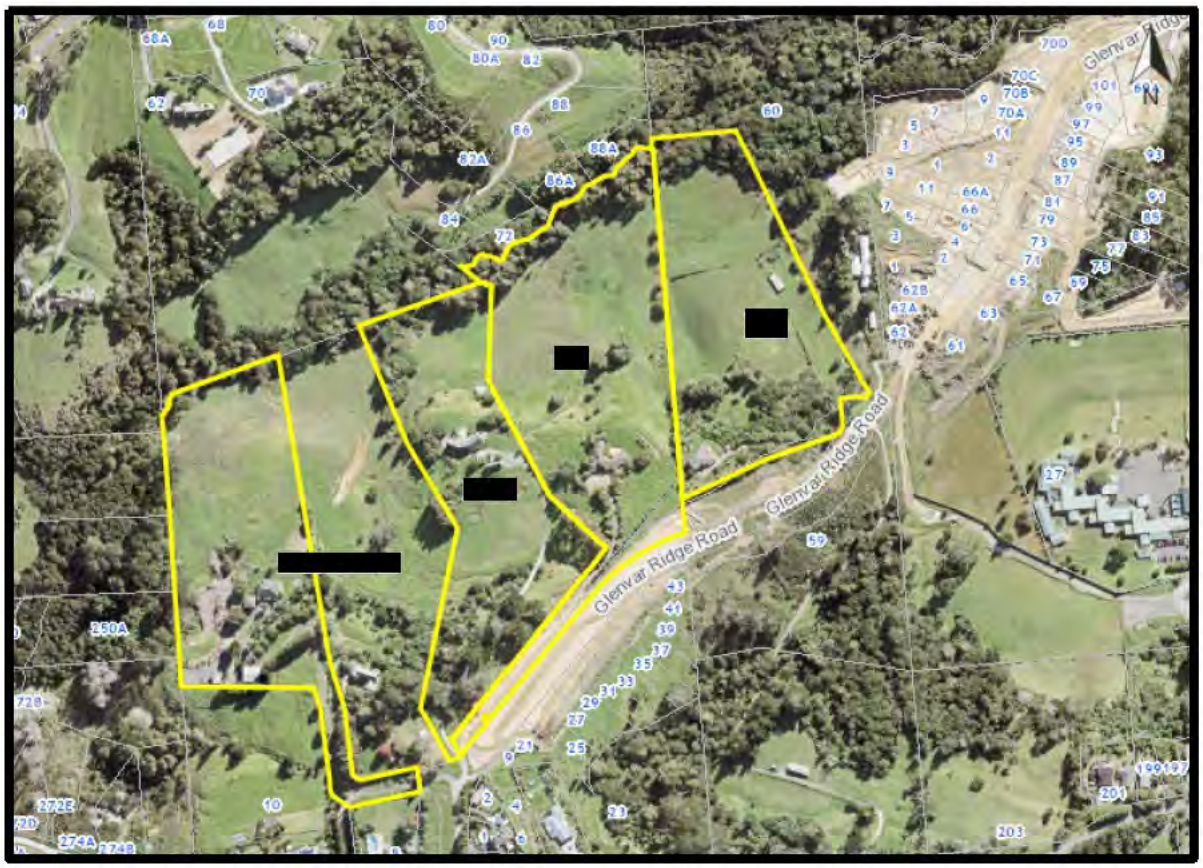


Figure 1 – Aerial image of 14, 20, 32, and 58 Glenvar Ridge Road, Long Bay (Auckland Council GeoMaps, 31/07/23)

There are several precincts applying to Long Bay in the Auckland Unitary Plan- Operative in Part (AUP-OP). The Long Bay Precincts have enabled development of a new community on greenfield land in an integrated and sustainable way that protects and enhances the natural environment – both terrestrial and marine.

Long Bay Sub-Precincts A, B and D apply to the land; Sub-Precincts A and B cover the Residential Large Lot Residential Zone portion of the land while Sub-Precinct D covers the Residential – Single House Zone portion of the land. The land in question is predominately Precincts A and B – Residential Large Lot Residential Zone.

The AUP-OP describes Sub-Precinct A as Large Lot Residential, Sub-Precinct B as Rural Residential and Sub-Precinct D as Suburban neighbouring – north of Vaughans Stream (Steam Protection A Area). Refer to AUP-OP zoning map overleaf.

Sub-Precinct B provides for Rural Residential living. Activity Table I519.4.3 provides for pastoral farming and horticulture as permitted activities within Sub-Precinct A and B. These activities are incompatible with the current use and development of the surrounding land which is predominantly utilised for lifestyle use. This is a completely inefficient use of this land which is ideally located, and physically able, to be developed for more intensive residential purposes.

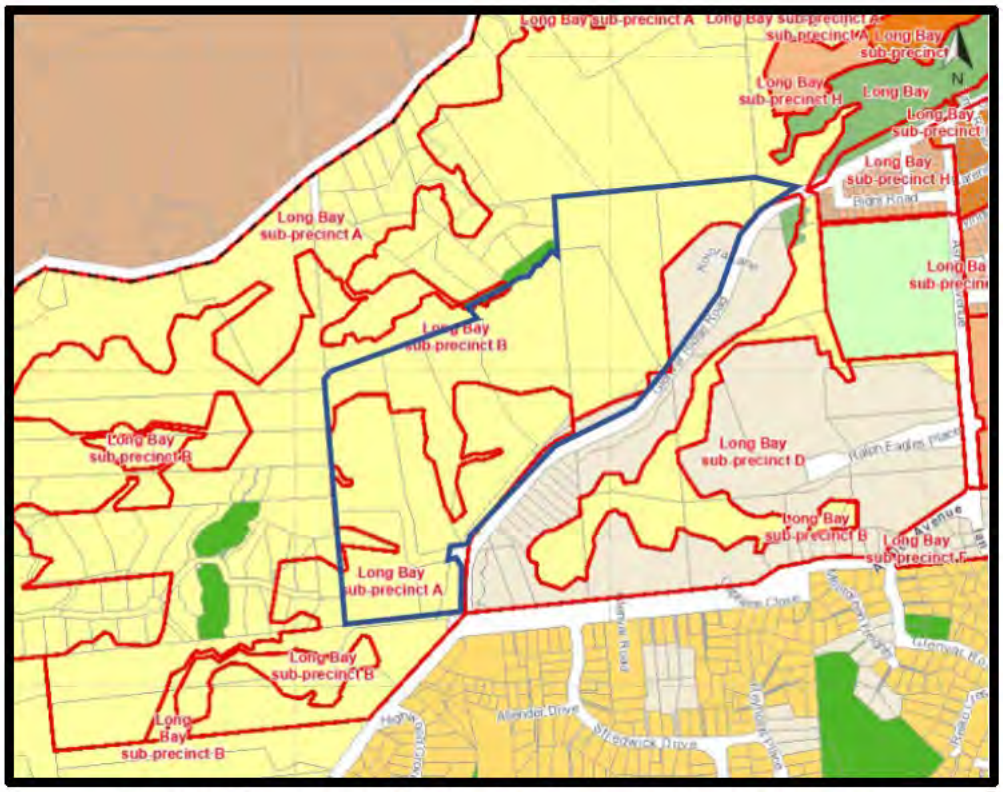


Figure 2 - Map showing AUP-OP zoning of Glenvar Ridge Road, Long Bay (Auckland Council AUP-OP Maps, 31.07.23)

Walkability from the land to Long Bay Local Centre is near ideal. Walking is facilitated by new, wide footpaths that span the length of Glenvar Ridge Road on both sides, three existing pedestrian crossings, flat topography along the urbanised section of the road, and the grass berm and landscaped setback of the footpath from the road that provides for pedestrian safety. Further to this, the area has high amenity value in terms of street landscaping, a variety of built form, coastal views, and ease of access to reserves and open spaces.

For the able-bodied, the land is located within walking distance to the local centre, Long Bay Primary, Long Bay College, the sports fields at Ashley Reserve, Long Bay Medical Centre, New World, Long Bay Regional Park, and Long Bay Beach. Long Bay is a 30-minute drive north of the Auckland CBD, 10km north-east of Albany and 18km north of Takapuna, and within easy reach of the main public transport hubs of the North Shore.

There are also public transport options, and an extensive reserve network at Long Bay in the immediate vicinity.

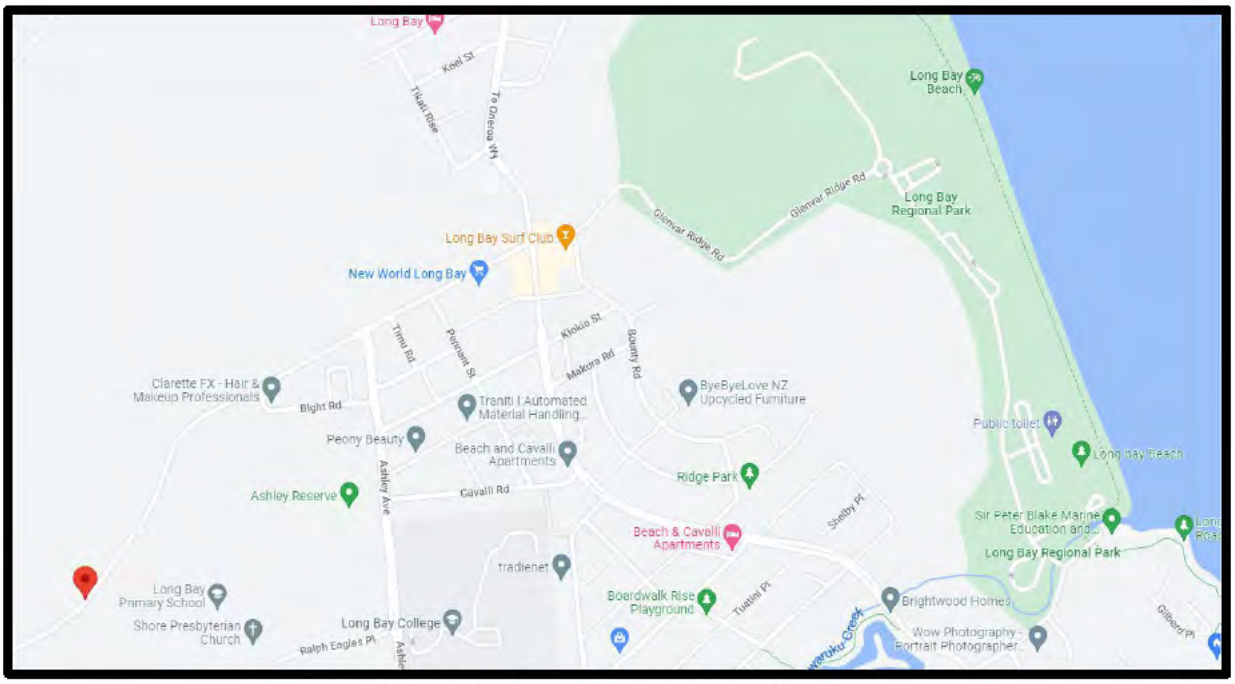


Figure 3: Locational Map (Source: Google Maps)

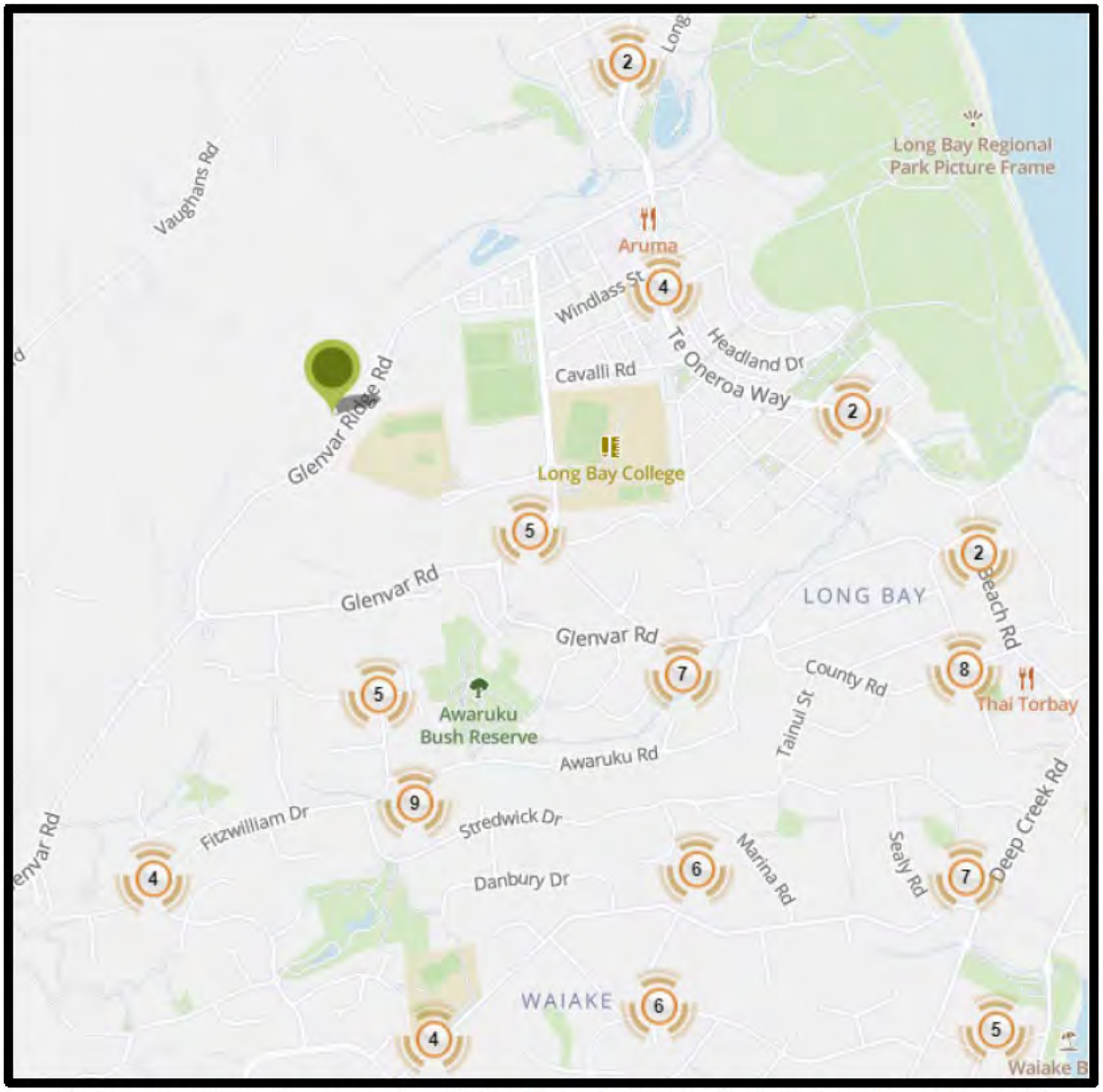


Figure 4: Nearby Bus Stops (number of bus stops at location indicated by number inside circle) (Source: https://at.govt.nz/bus-train-ferry/timetables/find-my-stop-or-station-on-a-map/)

The land to the immediate east of the sites is owned by Templeton Long Bay North Limited. This land is currently under development for more intensive residential forms. The land adjacent to Glenvar Ridge Road provides an opportunity for land to accommodate additional residential density without compromising Rural – Countryside Living zoned land further to the north on the other side of Vaughans Stream.

This land presents a significant opportunity to provide for more homes within the Long Bay catchment that are within walking distance to the local centre. Greater efficiencies are achieved, and a quality compact urban form can be better achieved by enabling urban development on strategically located greenfields land, rather than relying on ad hoc infill to occur to provide for the required housing supply. The land is not subject to flooding or other natural hazards and is able to be connected to existing infrastructure.

Given advice from experts about the ability to physically develop the land, including adjoining parcels of land identified in blue in Figure 2 above, for higher density residential development the submitter is in the process of preparing a private plan change to rezone the land within Figure 2 as Residential – Mixed Housing Urban. Auckland Council are aware of the proposed plan change. A meeting was held with Council officers to discuss the proposal in March 2022.

Auckland Council's Intensification Plan Change 78 has taken a blanket approach to exclude Residential- Large Lot zoned sites from the application of the MDRS. This means that the subject land was excluded by Plan Change 78 with no consideration given to whether is residential development potential should be intensified to assist with the delivery of much-needed housing supply

Given the lands unique split-zoning characteristics, greenfield development potential and proximity to an existing local centre, makes mixed housing urban zoning and related residential development a better, more efficient outcome for the land than the existing zoning pattern. The submitter lodged a submission to Plan Change 78 seeking that the medium density residential standards (delivered via rezoning of land to Residential- Mixed Housing Urban) be applied to the subject land and some adjacent land. A copy of this submission is included within Attachment 1.

The approach taken by Plan Change 78 seems to be in direct conflict with the Future Development Strategy which recommends intensification within existing urban areas, given that the submitters land falls within an existing urban area but is proposed to be retained as Residential- Large Lot

Restricting the development opportunities on this large undeveloped residential land that is within close proximity to the Long Bay Village does not align with the purpose of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 or Policy 3 of the National Policy Statement for Urban Development (NPS-UD). The opportunities should be recognised within the FDS.

Future Development Strategy - Long Bay

The land is identified as 'Already Living Zoned' in the FDS. See Figure 5 below:

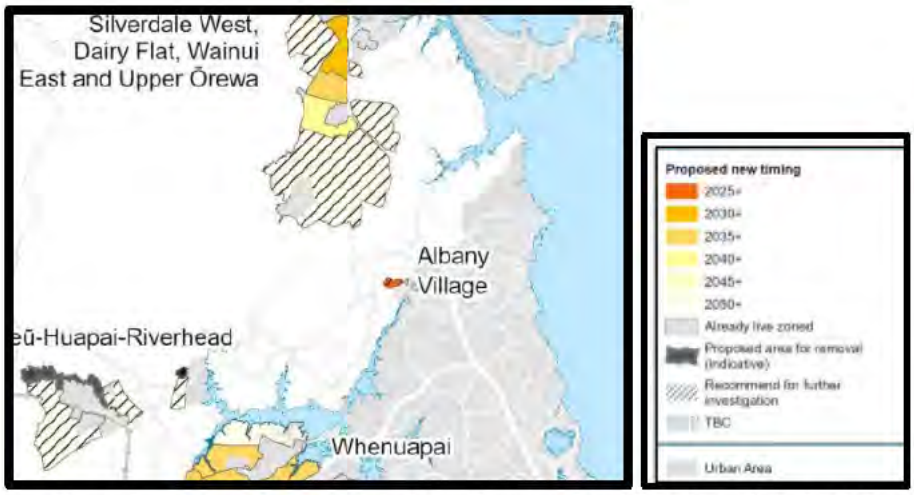


Figure 5 – Proposed new timing of Development (Auckland Council draft FDS)

The FDS does not go as far as to identify any specific existing urban areas which could be intensified; it should. One would presume this matter would have been considered and addressed by Plan Change 78; however in the instance of Long Bay this has been excluded from consideration under Plan Change 78.

Section 2.5 of the FDS sets of the principles for growth and change. These principles are stated as follows:

- *Principle 1: Support greenhouse gas emission reduction*
  - *Principle 1(a): Intensify the existing urban areas and limit further urban expansion*
  - *Principle 1(b): Strengthen accessible, walkable and mixed-use neighbourhoods*
  - *Principle 1(c): Bring jobs and homes closer together*
- *Principle 2: Adapt to the impacts of climate change*
  - *Principle 2(a): Avoid further growth in areas exposed to hazards and promote resilient design solutions*
  - *Principle 2(b): Prioritise integrated, nature-based, regenerative and resilient infrastructure*
  - *Principle 2(c): Support communities to develop appropriate adaptation responses in high-risk areas*
- *Principle 3: Make efficient and equitable infrastructure investments*
  - *Principle 3(a): Take a regional view to infrastructure investment and costs*
  - *Principle 3(b): Make the best use of existing infrastructure*
  - *Principle 3(c): Make investment decisions that deliver on multiple outcomes*
- *Principle 4: Protect and restore the natural environment*
  - *Principle 4(a): Protect ecosystems and integrate the natural and built environment*
  - *Principle 4(b): Restore and connect ecosystems*
- *Principle 5: Enable sufficient capacity for growth in the right place and at the right time*
  - *Principle 5(a): Direction for where and when growth is appropriate*
  - *Principle 5(b): Prioritise areas for growth and investment*
  - *Principle 5(c): Enable enough housing and business capacity to meet future needs*

Intensification of the subject land at Long Bay would meet all of the above principles yet it has been excluded from intensification by PC78. With respect to the above it is noted that:

- The land is close to all local amenities and public transport thus meeting Principle 1.
- The land is not subject to flooding; in any case such matters are appropriately controlled by the existing rules of the AUP-OP thus meeting Principle 2.
- Development of the subject land is able to utilize existing wastewater, water and stormwater infrastructure therefore Principle 3 is met.
- There are significant natural areas on the land which would be vested as an esplanade reserve when the land is developed thus meeting Principle 4.
- Further houses at Long Bay would assist with Principle 5.

Appendix 1 of the FDS contains five maps each showing the extent of the different groups of constraints to development:

- Natural hazards
- Natural Environment
- Natural Heritage
- Highly Productive Land
- Cultural Heritage

The lighter shaded areas represent less constrained areas in the region. The submitters land appears as less constrained on all five constraint maps in Appendix 1.

Broad Feedback

The National Policy Statement – Urban Development 2020 (updated May 2022) ("NPS-UD") requires every Tier 1 and 2 Local Authority to prepare a Future Development Strategy ("FDS"). Subpart 4 of the NPS-UD states that an FDS must be prepared and made publicly available *"…every 6 years and in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority".*

The FDS has to apply, as a minimum to the urban environments of Tier 1 and 2 Local Authorities, and can apply to a wider area.

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

> *(1) The purpose of the FDS is:*
>
> *(a) to promote long-term strategic planning by setting out how a local authority intends to:*
>
> *(i) achieve well-functioning urban environments in its existing and future urban areas; and*

(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) 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.

(3) Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.

Clause 3.14 states the FDS must be informed by:

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

(b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS

(c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans

(d) Māori, and in particular tangata whenua, values and aspirations for urban development

(e) feedback received through the consultation and engagement required by clause 3.15

(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement

(g) any other relevant national policy required by, or issued under, legislation.

Clause 3.17 states that the effect of the FDS requires every local authority to have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

Consultation and Engagement:

Clause 3.15 (2) and Clause 3.16 of the FDS states that when prepare the draft using the Special Consultative Procedure in s83 of the Local Government Act 2002, or when undertaking a review of the FDS the local authority must engage with the development sector to identify significant future development opportunities and infrastructure requirements. The requirements for a review of the FDS, Clause 3.16 (2) requires that the review must also include engagement with landowners.

Given the above Auckland Council must take into account feedback provided by land developers and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS.

The Purpose of the FDS is set out above namely to achieve well-functioning urban environments in existing and future urban areas now and over the long-term.

Well-Functioning Urban Environment:

Well-functioning urban environment has the meaning set out in Policy 1 of the NPS-UD:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and
(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

The intensification of the subject land will contribute to a well-functioning urban environment through the provision of additional housing supply and choice within proximity to the Long Bay centre, open space areas and transport routes.

Specific Feedback in Response to Have Your Say

Focusing Growth:

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.

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

Intensification of the subject land meets all of the above.

Accessible Local Centres:

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.

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

Intensification of the subject land meets all of the above.

Avoiding Hazards:

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.

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

The subject land is not subject to natural hazards that would impede its development.

Resilient Infrastructure:

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.

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

Development of the subject land would be able to meet all of the above.

Conclusions and Outcomes Sought

The submitter seeks that the subject land area is specifically identified as an area for intensification under the FDS and that this is captured within Appendix 12: Implementation Actions, namely changes to the Auckland Unitary Plan.

The submitter seeks Auckland Council hold a specific hearing process for the FDS submissions (not just invite submitters to speak at an upcoming Council meeting), given the importance of the FDS/submissions. To reiterate, Red Rhino Consultants Limited and Airport Rent A Car Limited wishes to be heard in support of its submission.

Yours sincerely



The Planning Collective Limited
Ph: 021 382 000
Email: diana@thepc.co.nz

Attachments:
1 – Submission to Plan Change 78, 79 and 80

Attachment 1:

Submission to Plan Change 78, 79 and 80

THE PLANNING COLLECTIVE

Form 5

Submission on a notified proposal for policy statement or plan changes or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Auckland Council (via email: unitaryplan@aucklandcouncil.govt.nz)

Name of Submitter: Red Rhino Limited and Airport Rent A Car Limited - owners of [redacted] Ridge Road, Long Bay

Red Rhino Limited and Airport Rent A Car Limited could not gain an advantage in trade competition through this submission.

This submission is made on behalf of Red Rhino Limited and Airport Rent A Car Limited to Auckland Council on the Proposed Plan Change 78: Intensification, Proposed Plan Change 79: Transport and Proposed Plan Change 80: to the RPS on Well-functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters.

The specific provisions that this submission relates to are:

Plan Change 78

- The retention of the Residential – Large Lot zone applying to the land. The submission seeks that the Residential – Mixed Housing Urban, with no qualifying matters, be applied to the land identified in Figure 1 overleaf, namely [redacted] Glenvar Ridge Road, Long Bay, (referred to as 'the land' from here on in).
- Any other provisions required to achieve the outcomes sought in the submission.

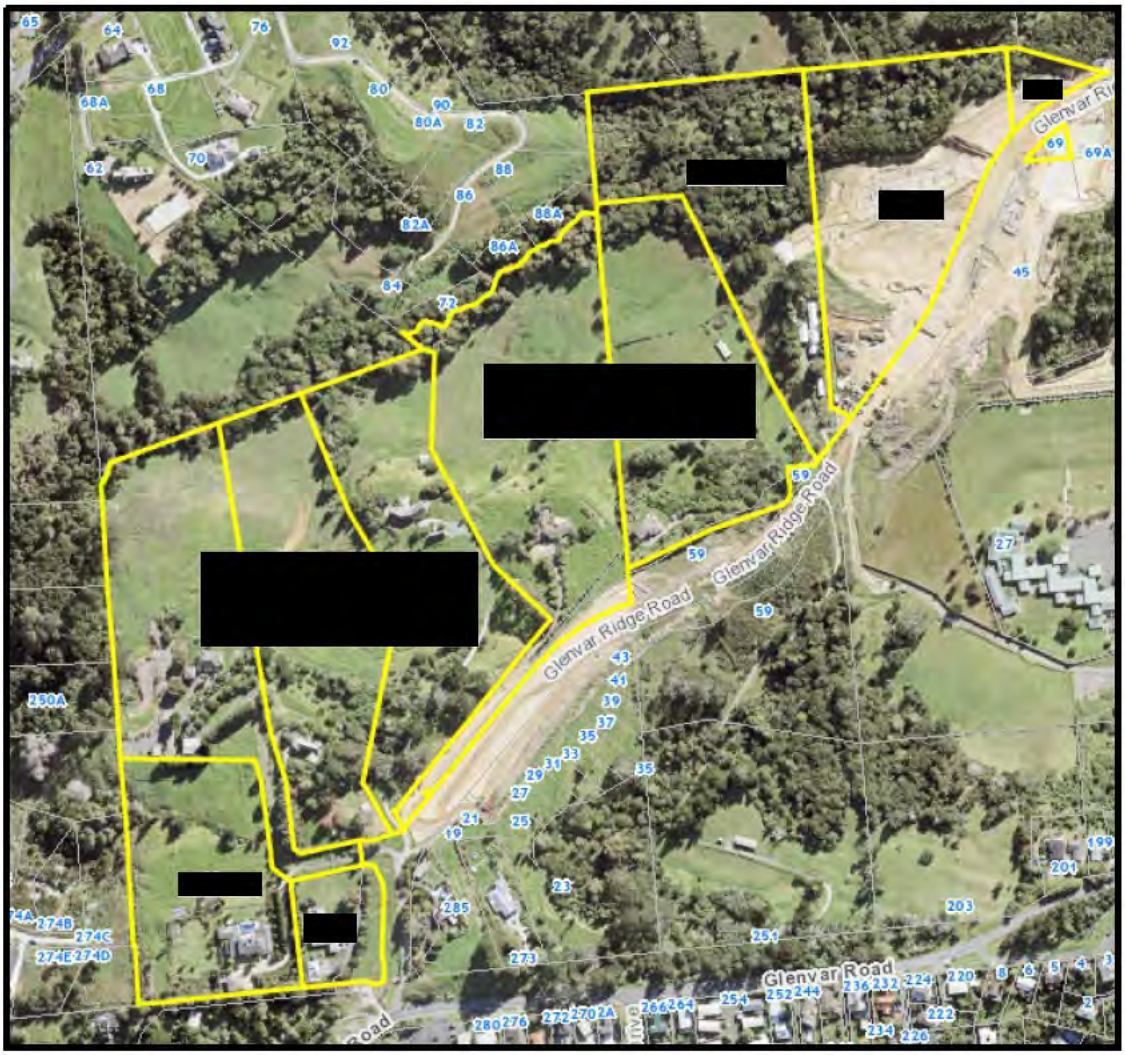


Figure 1: Aerial image of sites suitable for rezoning (Source: Auckland Council GeoMaps)

Plan Change 79

- Provisions relating to pedestrian and cycle access, EV charging and lighting and access to rear sites.

Plan Change 80

- B2.2
- B2.3.1
- B2.3.2 (1) (g) and (h)
- B2.4.1
- B2.4.2 (2), (3), (4) and (5)
- B2.5
- B2.7 – open space and resilience to climate change – many esplanade reserve areas will be subject to the effects of climate change so there needs to be better guidance in the Policy here. i.e., reserves should be vested but then the extent to which they are developed needs to be considered in the context of the effects of climate change.

- B2.9 para 4 – more guidance and detail required in relation well-functioning urban environment and reject references to limiting intensification.
- Any other provisions required to achieve the outcomes sought in the submission.

Scope of the Submission

Section 77F of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 notes that urban environment means:

> *"any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people."*

Section 77G (1) of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 outlines that *every relevant residential zone of a specified territorial authority must have the MDRS incorporated into that Zone.* The definition of Residential Zone within the Act is:

relevant residential zone—

(a) means all residential zones; but

(b) does not include—

(i) a large lot residential zone:

(ii) an area predominantly urban in character that the 2018 census recorded as having a resident population of less than 5,000, unless a local authority intends the area to become part of an urban environment:

(iii) an offshore island:

(iv) to avoid doubt, a settlement zone

The subject sites are zoned Residential – Single House and Residential – Large Lot under the Auckland Unitary Plan – Operative in Part (AUP-OP). Refer to **Attachment 1** for a copy of the AUP-OP planning maps.

PC78 has rezoned the AUP-OP Residential – Single House zone portion of the sites to Medium Density Residential zone; however, it has retained the Residential Large Lot Zone over those portions of the sites (most of the land) which were identified as Residential Large Lot zone under the AUP-OP. While PC78 has rezoned the AUP-OP Residential – Single House zone portions of the sites to Residential – Mixed Housing Urban the precinct qualifying matter reduces this zoning to the new Residential – Low Density Residential zone.

While not required to apply the MDRS provisions under section 77G(1) under section 77G(4), Council may create new residential zones or amend existing residential zones.
The Residential – Large Lot zone is an existing residential zone as per the National Planning Standards. Auckland Council therefore has scope to consider the appropriate residential zone that should be applied to the sites as part of PC78.

Auckland Council has identified that PC 78 applies to the relevant land. This can be seen from the PC78 viewer which shows the land as being subject to zoning under PC 78:

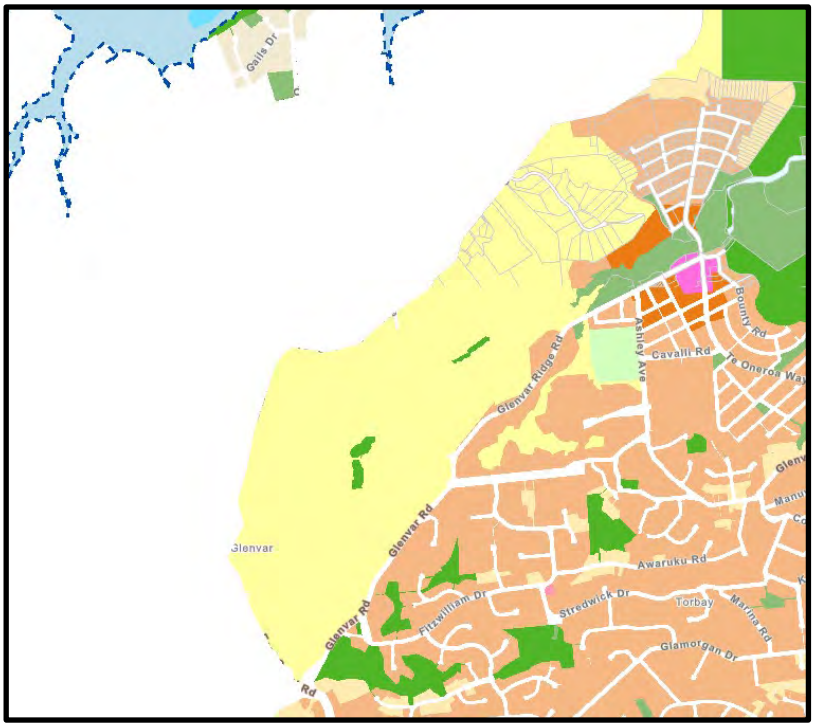


Figure 2: Subject site inclusion in PC78 (Source: PC78 Map Viewer)

By contrast, the viewer clearly shows land that is not within the scope of PC78 as "white". For example, see Scott Point which is excluded from PC 78 and land to the south of the Upper Harbour Motorway which is also excluded from PC 78 because it is outside the Urban Environment.

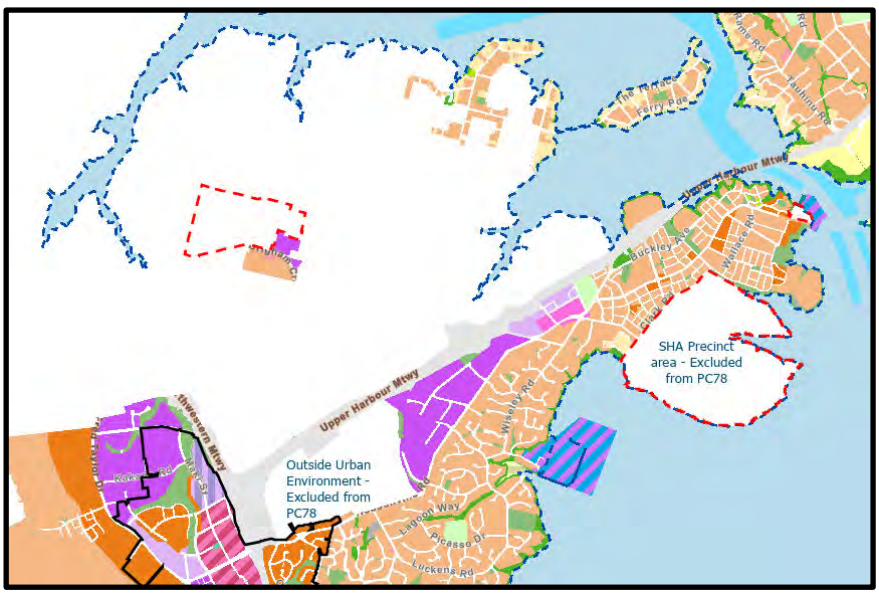


Figure 3: PC78 Maps identifying areas AC consider to be out of scope (Source: PC78 Map Viewer)

Reasons for Submission

Strategic Direction

The NPS provides a clear and strong direction for intensification and maximisation of zoned opportunities in areas where there is high demand for housing.

> **"2.1 Objectives**
>
> Objective 1: New Zealand has well-functioning urban environments that 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.
>
> Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.
>
> Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:
> (a) the area is in or near a centre zone or other area with many employment opportunities
> (b) the area is well-serviced by existing or planned public transport
> (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment."

As is demonstrated by the following analysis and the sale prices for houses in Long Bay – there is extremely high demand for housing in Long Bay.

Site and Surrounding Area

The Long Bay Precinct has enabled development of a new community on greenfield land in an integrated and sustainable way that protects and enhances the natural environment – both terrestrial and marine.

The land comprises approximately 20-ha of greenfield land. The land is situated on the periphery of the existing Long Bay urban area currently undergoing conversion from low-density to medium density, and in some areas, high density, housing. The land has a southern boundary frontage to Glenvar Ridge Road and is characterised by undulating topography sloping northwards towards Vaughans stream.

Walkability from the land to Long Bay Local Centre is near ideal. Walking is facilitated by new, wide footpaths that span the length of Glenvar Ridge Road on both sides, three existing pedestrian crossings, flat topography along the urbanised section of the road, and the grass berm and landscaped setback of the footpath from the road that provides for pedestrian safety. Further to this the area has high amenity value in terms of street landscaping, a variety of built form, coastal views, and ease of access to reserves and open spaces. A series of photographs of the site and surrounding area are included with **Attachment 2.**

For the able-bodied, the land is located within walking distance to the local centre, Long Bay Primary, Long Bay College, the sports fields at Ashley Reserve, Long Bay Medical Centre, New World, Long Bay

Regional Park, and Long Bay Beach. Long Bay is a 30-minute drive north of the Auckland CBD, 10km north-east of Albany and 18km north of Takapuna, and within easy reach of the main public transport hubs of the North Shore.

There are also public transport options, and the extensive reserve network at Long Bay in the immediate vicinity.

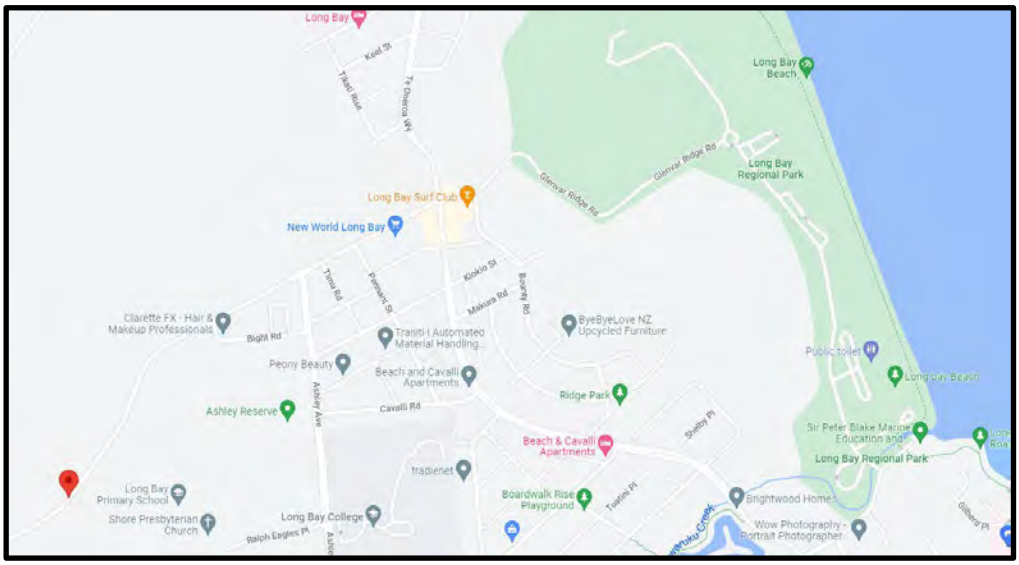


Figure 4: Locational Map (Source: Google Maps)

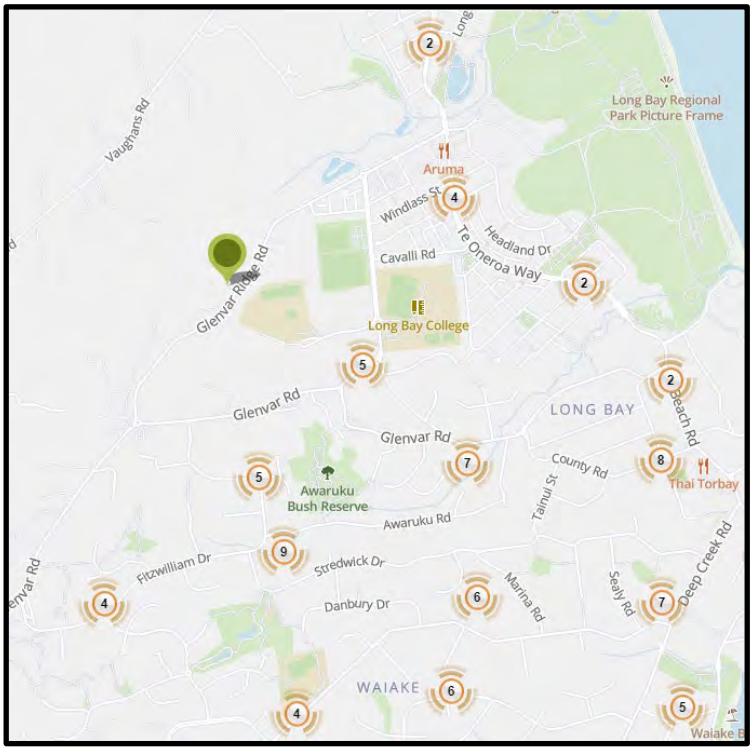


Figure 5: Nearby Bus Stops (number of bus stops at location indicated by number inside circle) (Source: https://at.govt.nz/bus-train-ferry/timetables/find-my-stop-or-station-on-a-map/)

The land to the immediate east of the sites is owned by Templeton Long Bay North Limited. This land is currently under development for more intensive residential forms. The land adjacent to Glenvar Ridge Road provides an opportunity for land to accommodate additional residential density without compromising Rural – Countryside Living zoned land further to the north on the other side of Vaughans Stream.

Current Zoning

There are several precincts applying to Long Bay in the AUP-OP. Sub-Precincts A, B and D apply to the land; Sub-Precincts A and B covers the Residential Large Lot Residential Zone portion of the land while Sub-Precinct D covers the Residential – Single House Zone portion of the land. The AUP-OP describes Sub-Precinct A as Large Lot Residential, Sub-Precinct B as Rural Residential and Sub-Precinct D as Suburban neighbouring – north of Vaughans Stream (Steam Protection A Area). Refer to AUP-OP zoning map below:

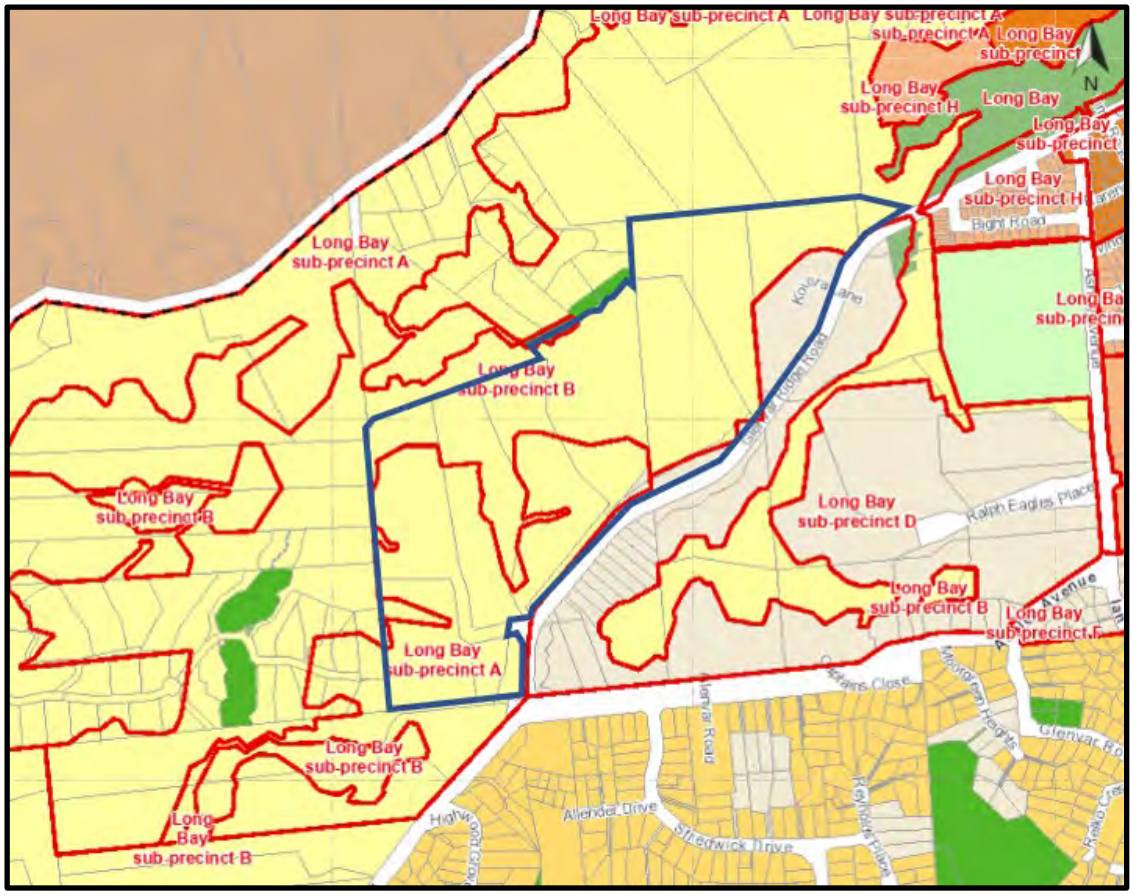


Figure 6: Zoning under the AUP-OP. The sites are outlined in purple.

Sub-Precinct B provides for Rural Residential living. Activity Table I519.4.3 provides for pastoral farming and horticulture as permitted activities within Sub-Precinct A and B. These activities are incompatible with the surrounding development. Instead, the sites are likely to be subdivided like those on the other side of Vaughans Stream and used for large lifestyle lots; this is a completely inefficient use of this land which is ideally located, and physically able, to be developed for residential purposes.

Planned Development

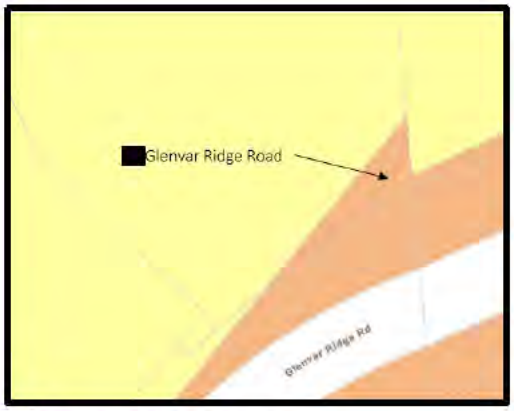
Given advice from experts about the ability to physically develop the land for high density residential development, while managing environment effects, the submitter, our client, is in the process of preparing a private plan change to rezone the land subject to this submission to enable a greater density of residential development on the land. Auckland Council are aware of the proposed plan change. A meeting was held with Council officers to discuss the proposal in March 2022. They will then seek to apply for subdivision and land use consents to develop the land. The Plan Change and resource consents are due to be submitted early 2023.

Plan Change 78: Intensification

Rather than undertake an analysis of whether the Residential – Large Lot zoned land in question should be subject to the MDRS provisions the s32 analysis simply states that the MDRS requirements do not apply to the Residential – Large Lot zone.

Plan Change 78 zones the land as follows:

- Residential – Large Lot Zone [redacted] Glenvar Ridge Road)
- Very small portions of [redacted] Glenvar Ridge Road are zoned as Residential – Mixed Housing Zone (See figures below) however this is limited to the new Residential – Low Density Residential zone due to the Long Bay Precinct being a Qualifying Matter. Larger portions of land are zoned as Residential – Mixed Housing Zone on [redacted] Glenvar Ridge Road.



[redacted] Glenvar Ridge Road



[redacted] Glenvar Ridge Road

It also identifies the following qualifying matters being present across the land:

- Flood Plains ([redacted] Glenvar Ridge Road)
- Significant Ecological. Areas – Terrestrial ([redacted] Glenvar Ridge Road)
- Precinct [redacted] Glenvar Ridge Road)
- Water and/or Wastewater Constraints Control ([redacted] Glenvar Ridge Road)
- Designation ([redacted] Glenvar Ridge Road)
- Historic Heritage Place Overlay [redacted] Glenvar Ridge Road)

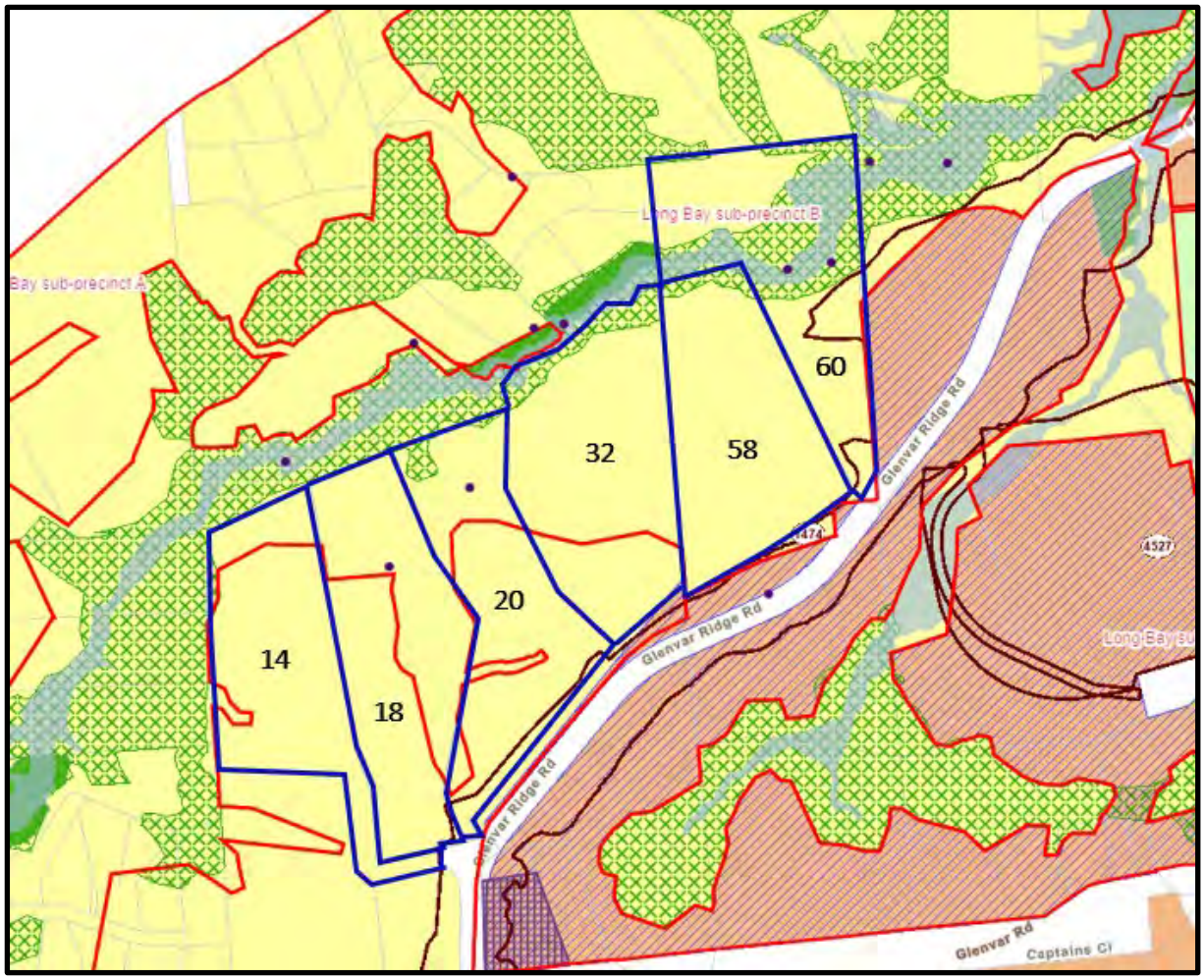


Figure 7: PC78 Zoning and Qualifying Matter Map (site boundaries indicative)

The s32 report for Long Bay states:

> *This evaluation report will continue to be refined in response to any consultation feedback provided to the council, and in response to any new information received. No specific pre-notification consultation has been undertaken.*

The dates of the figures etc. within the s32 report are dated June 2022. It appears that despite feedback given on the draft MDRS provisions that no further evaluation has been undertaken. Our client presented feedback on the draft MDRS provisions (a copy of which is included within **Attachment 3**) and Auckland Council policy planners were aware of the proposed private plan change.

As set out above, the MDRS provisions do give scope to change residential zonings. PC78 has replicated the zoning patterns applying to the site under the AUP-OP. No consideration has been given to whether any rezoning should occur as a part of PC78 with respect to the subject site. This is particularly so with the plan changes also required to implement the National Policy Statement – Urban Development ("**NPS – UD**") in relation to walkable catchments and building height and with well-functioning urban environments being of national importance.

The sub-precent evaluation for Sub-Precinct D within the s32 report is as follows:

Integrated evaluation for sec 77K (a) to (i) qualifying matters for Sub-precinct D

Sub-precinct D provides for lower density residential lots in the Stream Protection A area (high quality stream). 600m² site area applies. Significant Ecological Areas that follow stream corridors are identified as Long Bay Sub-precinct B.

Qualifying matters in section 77I/O(a) to (i)	Significant Ecological Areas (SEA) overlay responding to Section 6(c) of the RMA and Policy 11 of the NZCPS	Stream Protection A area responding to Policy 22 of the NZCPS (Sedimentation) and sec 8, Hauraki Marine Park Act
Relevant precinct provisions supporting QMs	Residential – Single House Zone • Table I519.1.1 • I519.2 Objective (12) • I519.3 Policies (6)(c), (45), (46), (54) • I519.4.1 Activity Table (A2), (A5), (A6), (A7), (A8), (A9), (A14), (A15), (A18). • I519.4.6 Activity Table • I519.6.2 Building height (1), and (2) • I519.6.3 Yards (1), (7), (8) • I519.6.4 Building coverage (1) • I519.6.20 Subdivision (1)	Residential – Single House Zone • Table I519.1.1 • I519.2 Objective (12) • I519.3 Policies (6)(c), (45), (46), (54) • I519.4.1 Activity Table (A2), (A5), (A6), (A7), (A8), (A9), (A14), (A15), (A18). • I519.4.6 Activity Table • I519.6.2 Building height (1), and (2) • I519.6.3 Yards (1), (7), (8) • I519.6.4 Building coverage (1) • I519.6.20 Subdivision (1)
Effects managed	Effects on indigenous vegetation and fauna	Effects on steam health and receiving environment
Applies to residential / non-residential zone in relation to Policy 3 and / or MDRS	Residential – Single House Zone is a relevant residential zone	
How qualifying matter changes level of development enabled by Policy 3 and / or MDRS	Important aspects of the Sub-precinct are the larger lots sizes (600m²), 35% building coverage and limited impervious area coverage (50%). Larger site size and modest building coverage helps reduce pressure to remove SEA vegetation in stream valley to accommodate expected development, and/ or install large retaining structures that may modify ground water flows.	Larger site size, lower building coverage along with impervious area limit helps manage stormwater impacts using on-site techniques. Note: MDRS does not control impervious area Larger lot size also assists with limiting earthworks (and as a result sediment generation)
Conclusion	Amend zoning to Residential – Low Density Residential	Amend zoning to Residential – Low Density Residential

Therefore, the single house zone portions of Sub-Precinct D applying to the site which have been zoned Residential Medium Intensity Residential on the PC78 maps are in fact limited to Residential – Low Density Residential by the precinct provisions.

Supporting Information

The National Policy Statement on Urban Development 2020 (NPS-UD) recognises the national significance of:

- having well-functioning urban environments that 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
- providing sufficient development capacity to meet the different needs of people and communities.

The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act passed into law on 20 December 2021. This Act amends the Resource Management Act 1991 (RMA) by bringing forward and strengthening the NPS-UD.

As demonstrated through the information above and attached, the land is ideally located, and physically able to be developed for more intensive residential development than provided for within the zones applied under the AUP-OP and now PC78.

The changes proposed through Plan Change 78 seek to zone the AUP-OP Residential – Single House Zone land Residential- Low Density Residential. This outcome is only enabled where there are Qualifying Matters that would be incompatible with the level of development enabled by the MDRS; or where the Qualifying Matters makes the level of development promoted by the Amendment Act in appropriate in light of the national significance of urban development and the objectives of the National Policy Statement – Urban Development ("NPS-UD").

Application of Qualifying Matters

The Proposed Plan Change 78- Intensification to the Auckland Unitary Plan (Operative in Part) Residential and Business Zones Section 32 Evaluation Report[1] highlights that the proposed Low Density Residential zone is applied to urban residential areas where:

- *"where relevant qualifying matters require and result in a lower intensity of development, limiting the levels of development.*
- *MDRS are enabled as a permitted activity in the zone to a limited extent to ensure that it does not detract from the identified qualifying matters that exist in these zones. For instance, the height in relation to boundary, landscaped area, outlook, outdoor living area and windows to street standards have all been aligned to MDRS.*
- *The permitted activity density standards of the MDRS relating to the number of dwellings per site, height, front yards and building coverage are less enabling than MDRS. This is to provide for a reasonable level of development whilst ensuring that development responds to qualifying matters that relate to the site and delivering quality built environment outcomes as directed under the RPS."*

It is understood that the Auckland Council has identified this land as not being suitable for Medium Density zoning i.e. Residential- Mixed Housing Urban given the Qualifying Matters on the Site. Clause 77L of the legislation states:

[1] The Proposed Plan Change 78- Intensification to the Auckland Unitary Plan (Operative in Part) Residential and Business Zones Section 32 Evaluation Report, Prepared by Auckland Council.

77L Further requirement about application of section 77I(j)

A matter is not a qualifying matter under section 77I(j) in relation to an area unless the evaluation report referred to in section 32 also—

(a) identifies the specific characteristic that makes the level of development provided by the MDRS (as specified in Schedule 3A or as provided for by policy 3) inappropriate in the area; and

(b) justifies why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD; and

(c) includes a site-specific analysis that—

(i) identifies the site to which the matter relates; and

(ii) evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter; and

(iii) evaluates an appropriate range of options to achieve the greatest heights and densities permitted by the MDRS (as specified in Schedule 3A) or as provided for by policy 3 while managing the specific characteristics.

Plan Change 78 has not demonstrated that the requirements of clauses 77J or 77L have been met. 77J states:

77J Requirements in relation to evaluation report

(1) This section applies if a territorial authority is amending its district plan (as provided for in section 77G).

(2) The evaluation report from the specified territorial authority referred to in section 32 must, in addition to the matters in that section, consider the matters in subsections (3) and (4).

(3) The evaluation report must, in relation to the proposed amendment to accommodate a qualifying matter,—

(a) demonstrate why the territorial authority considers—

(i) that the area is subject to a qualifying matter; and

(ii) that the qualifying matter is incompatible with the level of development permitted by the MDRS (as specified in Schedule 3A) or as provided for by policy 3 for that area; and

(b) assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and

(c) assess the costs and broader impacts of imposing those limits.

(4) The evaluation report must include, in relation to the provisions implementing the MDRS,—

(a) a description of how the provisions of the district plan allow the same or a greater level of development than the MDRS:

(b) a description of how modifications to the MDRS as applied to the relevant residential zones are limited to only those modifications necessary to accommodate qualifying matters and, in particular, how they apply to any spatial layers relating to overlays, precincts, specific controls, and development areas, including—

(i) any operative district plan spatial layers; and

(ii) any new spatial layers proposed for the district plan.

(5) The requirements set out in subsection (3)(a) apply only in the area for which the territorial authority is proposing to make an allowance for a qualifying matter.

(6) The evaluation report may for the purposes of subsection (4) describe any modifications to the requirements of section 32 necessary to achieve the development objectives of the MDRS.

The s32 Report **does not**:

- Demonstrate why the council considers the qualifying matter is incompatible with the level of development permitted by the MDRS.
- Assess the impact that limiting development capacity will have on the provision of development capacity; or assess the costs and broader impacts or proposing those limits.

And in relation to 77L -

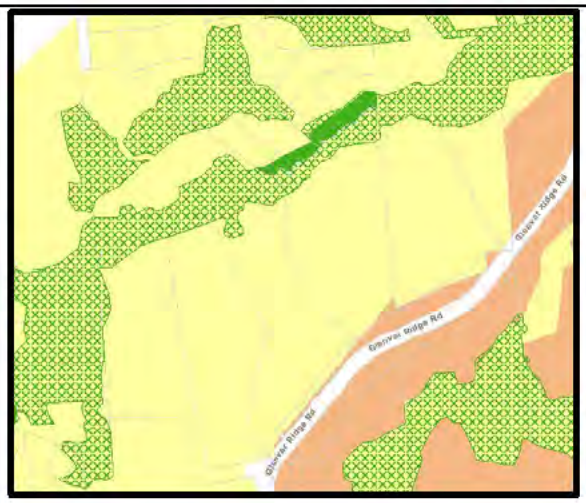
- Does not justify why the characteristic (qualifying matter) makes the level of development promoted by the Amendment Act inappropriate in light of the national significance of urban development and the objectives of the NPS-UD.

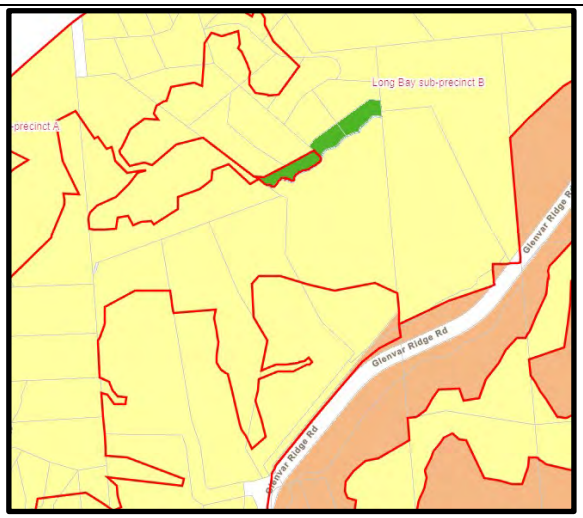
Restricting the application of the Residential- Mixed Housing Urban Zone is not justified for this land. The Qualifying Matters that are relevant to the land are controlled by other operative rules within Chapter E the AUP-OP.

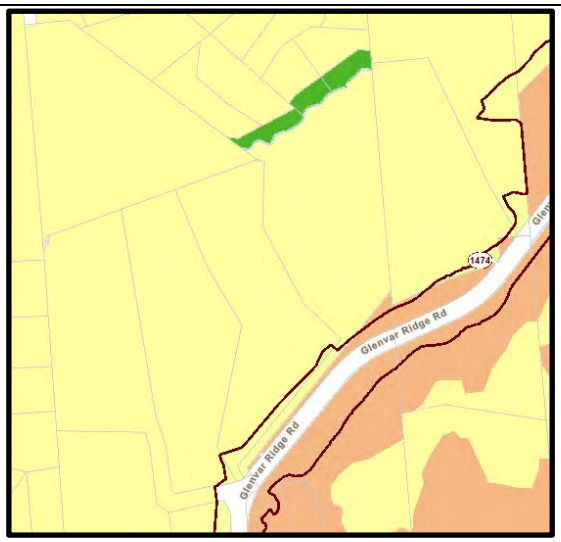
Restricting the development opportunities on this large site, close proximity to the Long Bay Village is not in accordance with the purpose of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 or Policy 3 of the NPS-UD.

This land presents a significant opportunity to provide for more homes within the Long Bay catchment that are within walking distance to the local centre. Greater efficiencies are achieved, and a quality compact urban form can be better achieved, by enabling urban development on strategically located greenfields land, rather than relying on ad hoc infill to occur to provide for the required housing supply.

An assessment of each Qualifying Matter is provided in the table below:

Qualifying Matter	Map	Comment
Flood Plains ([redacted] Glenvar Ridge Road)		The flood areas are protected via rules within AUP-OP. The flood overlay should not be a qualifying matter; flooding matters are able to be managed through careful design and there are rules within the AUP-OP to manage flooding effects. Much, if not all, of the land subject to this qualifying matter will be vested as esplanade reserve at the time of subdivision. In any event the mapped flood overlay does not necessarily depict the actual impact and therefore is not a tested Qualifying Matter that can be applied to the Land.
Significant Ecological. Areas – Terrestrial [redacted] Glenvar Ridge Road)		The SEA areas are protected via rules within Chapter E15 of the AUP-OP. The land in question is no different than the land to the east (64 Glenvar Ridge Road) which is part zoned as Medium Density Residential zone under PC78. The SEA overlay should not be a qualifying matter in this circumstance. Much, if not all, of the land subject to this qualifying matter will be vested as esplanade reserve at the time of subdivision.

Precinct [redacted] Glenvar Ridge Road)		Council have identified the presence of the Long Bay Precinct as a Qualifying Matter to restrict development. In seeking all the land to be zoned as Residential – Mixed Housing Urban we are seeking that the precinct provisions do not include any limitations to prevent development in accordance with the Residential – Mixed Housing Urban rules.
Water and/or Wastewater Constraints Control [redacted] Glenvar Ridge Road)		The s32 report notes that there are existing capacity issues in the East Coast Bays branch and the Torbay Branch Sewer and that solution optioneering is underway. The Long Bay catchment which would cover the land connects to the Long Bay Pump Station which pumps into the main trunk sewer to Browns Bay and then pumps through to the main trunk sewer to Mairangi Bay pump Station which is currently being upgrade. We do not consider there is a wastewater constraint for the Long Bay Catchment area. With respect to water, the Glenvar Reservoir would likely require a storage upgrade to allow for the increase in population as a result of the application of PC78 across the Long Bay area and other water catchments that it serves. This upgrade could be made as a result of funding by WLS/developer agreements to ensure that sufficient water

		supply can be provided without resulting in low of service levels to existing customers. The s32 report recognises that a significantly large private development proposal could fund the required work and the constraint may be removed. It is sought that this qualifying matter is removed from the land.
Designation ([redacted] Glenvar Ridge Road)		This should not be a qualifying matter – the designation has been given effect too and the road is operational.
Historic Heritage Place Overlay [redacted] Glenvar Ridge Road)		The Historic Heritage sites in question are middens on [redacted] and [redacted] Glenvar Ridge Road and middens & terraces as well as a ditch and bank on [redacted] Glenvar Ridge Road. These features are protected via the Historic Heritage Overlay in the AUP-OP and do not need to be a qualifying matter that limits residential development on the sites.

As demonstrated in the table above, the identified Qualifying Matters are not significant enough to limit the application of the Residential-Mixed Housing Urban Zone to the land. The rules within Chapter E of the AUP-OP will adequately manage the development outcome for the land.

Given the locational characteristics of the land, the development that has occurred, and is still

occurring, since the Long Bay Structure Plan was last considered; it is essential to consider whether the zoning over the land is appropriate in light of the new legislation. As the land is greenfields this is even more important as greenfields land generally enables higher residential density to be provided in a more efficient way while ensuring environment effects are recognized, managed, and protected, where appropriate, through design.

To achieve the outcomes stated in the NPS: UD and the Enabling Housing Supply and other matters Act, as well as to ensure the most efficient use of land, this submission seeks that all the land is zoned Medium Density Residential Zone.

Whilst it is acknowledged that the Council has taken a blanket approach to exclude Residential - Large Lot zoned sites from the application of the MDRS, the sites unique split-zoning characteristics, greenfield development potential and proximity to an existing local centre, makes mixed housing urban zoning and related residential development a better, more efficient outcome for the land than the existing zoning pattern. The zoning sought is more in keeping with the new legislation.

It is our submission that the land is entirely suitable for inclusion within PC78 as Medium Density Residential zone and that this is one of the circumstances where Council should exercise their discretion to include other zones as Medium Density.

Summary

The scope of PC78 includes the sites and the strategic direction of the NPS-UD requires a re-assessment of development opportunities for the land.

While the Council might consider that Residential Large Lot zone is not under consideration as a part of the blanket approach taken to applying the Residential - Mixed Urban Zone, it is necessary and appropriate to look at these sites in the context of the surrounding zoning.

The application of the Residential- Large Lot Zone in this location is no longer suitable for this site, when considering the adjoining zones, land uses and current development, the definition of the Residential - Large Lot Zone in the National Planning Standards and when considered in the context of the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The existing zoning, and the legislation has changed significantly since the zone was applied, and even since the Unitary Plan process.

Rezoning sought, i.e. Residential – Mixed Housing Urban with no qualifying matters, provides a significant positive opportunity to enable a comprehensive approach to residential development on this land.

Plan Change 79 – Transport

The Submitter's support the new provisions proposed in PC 79 – Chapter E27 accessible parking, safe and direct site access for pedestrians in residential zones, equipment to facilitate use of electric vehicles, bicycle parking standards.

With respect to the requirements to provide charging equipment for electric vehicles this is supported subject to Auckland Council ensuring there is sufficient electricity infrastructure available to provide the required power supply for these services without adversely affecting existing businesses and dwellings in Long Bay.

The Submitter's oppose the changes to the subdivision standards for Access to rear sites. If the changes are to be made the provisions require further clarification that Council and Auckland Transport will assess the effects of individual proposals via a resource consent for a Restricted Discretionary activity where the standard is exceeded. It is often more efficient to service more than 10 sites from a Jointly Owned Access Lot (JOAL) or Right of Way. Providing a clearer consenting pathway with supporting Matters of discretion and assessment criteria can enable better environmental outcomes to be achieved.

Rule E38.4.2 (A30) should be amended to change the activity status to RD – Restricted Discretionary from D – Discretionary.

Rule E38.4.2 (A31) should be amended to change the activity status to RD – Restricted Discretionary from D – Discretionary.

E38.12 Assessment restricted discretionary activities and E38.12.1 should be amended to provide for infringements to the Access to rear sites rules. The provisions will need to be amended to include matters of discretion and related assessment criteria.

<u>Plan Change 80 - RPS on Well-functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters</u>

Plan Change 80 seeks to incorporate additional text into the Regional Policy Statement ('RPS'). The text in general is supported but the submission seeks that the Objectives and Policies are further amended to provide direction as to what needs to occur to improve resilience to the effects of climate change and what reflects a well-functioning urban environment and to remove direction to limit intensification

The additional policy wording is generic and does not provide any guidance for assessing whether any proposal achieves the outcomes sought. For example, Policy 1 of the NPS-UD states:

> *Well-functioning urban environments, which are urban environments, that as a minimum:*
> *(a) have or enable a variety of homes that:*
> *(ii) meet the needs, in terms of type, price, and location, of different households; and*
> *(ii) enable Māori to express their cultural traditions and norms; and*
> *(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
> *(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
> *(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*

(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

The submission seeks that more specific guidance should be provided in the RPS Policies (consistent with Policy 1 of the NPS-UD) to direct what climate change resilience and well-functioning urban environments mean in the context to places in Auckland. For example, well-functioning urban environments in Auckland:

- contain well connected paths and trails for pedestrians and cyclists;
- have good quality and accessible public open spaces to support a wide range of recreational pursuits; including sport, active and passive recreation;
- have access to a range of quality community facilities including libraries, civic spaces and entertainment venues; and
- ensure the natural environment is protected and enhanced.

The submission seeks that the provisions to be included in the RPS relating to well-functioning urban environments and climate change resilience are expanded to provide specific policy guidance as to what these terms mean in the context of Auckland.

Without greater specificity the policies will not provide sufficient guidance as to how the objectives should be achieved in the context of Auckland.

The submitter notes the s32 report states that the RPS already adequately addresses more of the matters identified in the NPS-UD that are considered to contribute to a well-functioning urban environment and covered off specifically more[2]. The RPS needs to create the connection, or be explicit that achieving these outcomes i.e., a well-functioning urban environment is to be achieved with reference to all relevant provisions in the RPS, or clearly set out what represents a well-functioning urban environment.

The option to make minor amendments to the RPS Is understood but the Submitter notes that without some further guidance the costs of the changes proposed may be greater as there is less guidance on how the Plan seeks the outcomes be achieved and therefore there is greater scope of inconsistent decision making, appeals and inconsistent environmental outcomes.

In relation to Auckland – all of urban Auckland (i.e. excluding rural and coastal townships) falls within category (c) of Objective 3 of the NPS-UD, particularly Long Bay.

As a result it is necessary for all of urban Auckland to have the maximum zoned intensity possible. Further the demand for housing and the changes to desirable housing typology means that applications for resource consent should be considered on their merits and within the context of the most appropriate zoning and the relevant overlay / precinct provisions. Reducing zoned opportunity to the smallest possible extent reduces the opportunity to design sensible and careful developments that respond to the specific values of a site rather than just minimizing any kind of development.
The proposed changes to the RPS seek to give effect to Objective 3 and 4 of the RPS.

The proposed changes to the RPS are the most appropriate outcome to give effect to the NPS-UD and is required by s61(1)(da) of the RMA.

[2] Plan Change 80, s32 Report, page 15, paragraph 1

Decision Sought

Red Rhino Limited and Airport Rent A Car Limited seek the following decision by Auckland Council: that PC78, PC79 and PC80 be approved in part subject to the matters raised within this submission, namely:

Proposed Plan Change 78

- The rezoning of the land at [redacted] Glenvar Ridge Road, Long Bay to the Residential – Mixed Housing Urban with no qualifying matters applying (because the existing overlay provisions address the relevant matters in any event).
- The rezoning of all of the land identified in **Figure 1**, above.
- Any other relief required to achieve the outcomes sought in the submission.

Proposed Plan Change 79

- Amend Rule E38.4.2 (A30) to change the activity status to RD – Restricted Discretionary from D – Discretionary.
- Amend Rule E38.4.2 (A31) to change the activity status to RD – Restricted Discretionary from D – Discretionary
- Add matters of discretion and assessment criteria to E38.12 and E38.12.1 to provide for infringements to the Access to rear sites rules. The provisions will need to be amended to include matters of discretion and related assessment criteria.
- Any other relief required to achieve the outcomes sought in the submission.

Proposed Plan Change 80

- Clarify what a 'well-functioning urban environment' means in the context of Auckland. For example, they:
    - Contain well connected paths and trails for pedestrians and cyclists.
    - Have good quality and accessible public open spaces to support a wide range of recreational pursuits, including sport, active and passive recreation.
    - Have access to a range of quality community facilities including libraries, civic spaces, and entertainment venues; and
    - Ensure the natural environment is protected and enhanced.
- Express what climate change resilience will entail with respect to urban growth and form, natural resources, coastal environment, and environmental risk.
- Amend Objective 2.3.1 (1) by adding a new "a" and renumbering accordingly:
  enabling as many people to live in, and as many businesses and community services to be located in, areas of an urban environment as is reasonably practical and recognizing that this objective has the highest priority.
- Amend Policy 2.3.2(1) by adding a new "a" and renumbering accordingly:
  maximises the enabled intensification of all urban zoned sites and allows resource consent applications to address the interface between the zoning and any applicable overlay or precinct provisions through the resource consent process.
- Reject the proposed changes to Objective B2.4.1(1A).
- Reject the proposed changes to Policy B2.4.2, except in relation to climate change and natural

hazards.

- Reject references to limiting intensification in Para 4 of B2.9.
- Any other relief required to achieve the outcomes sought in the submission.

Hearing of Submission

Red Rhino Limited and Airport Rent A Car Limited do wish to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.



Manager/Planner
The Planning Collective Limited
(person authorised to sign on behalf of submitter)

Date 29 September 2022

Address for Service:

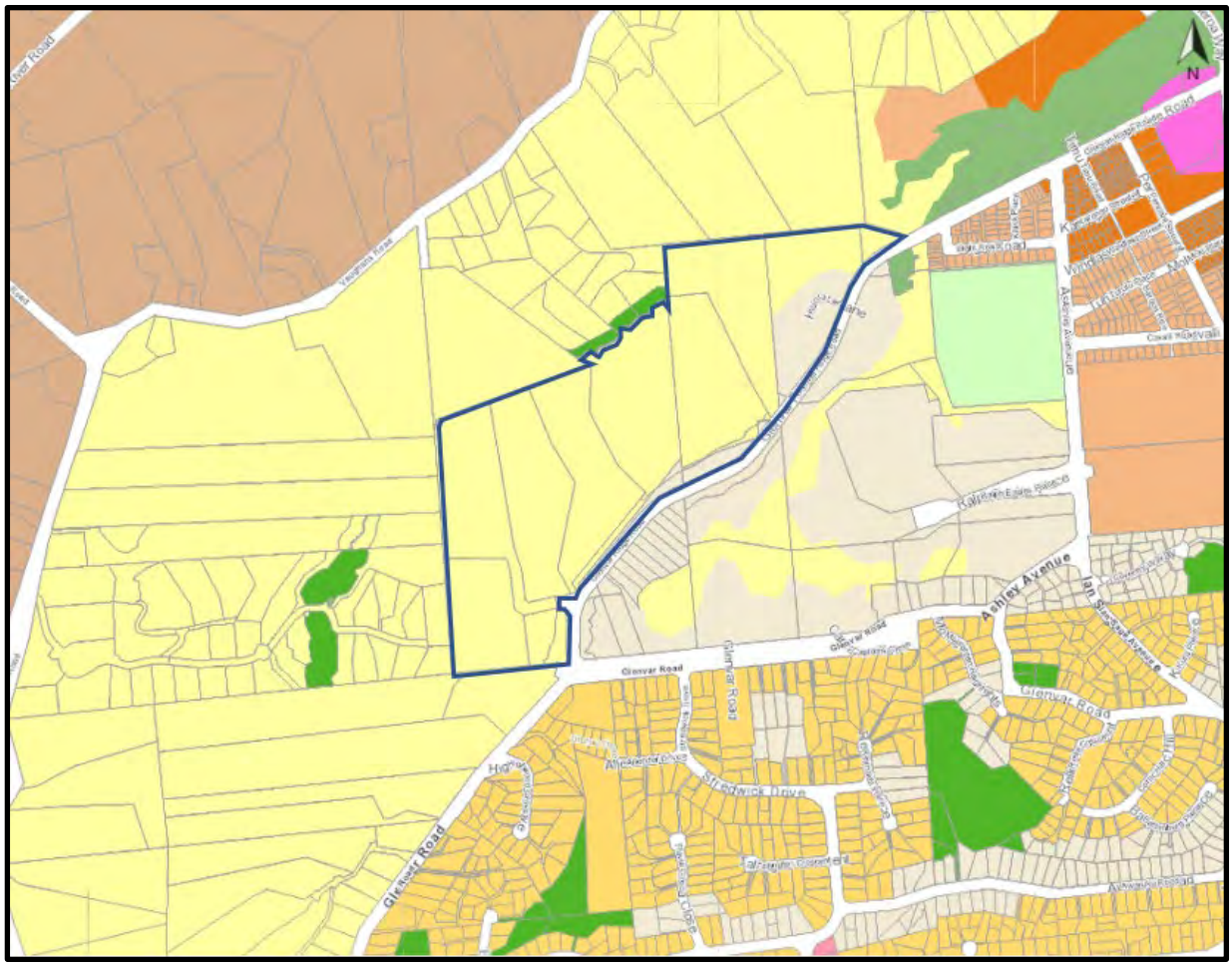
Red Rhino Limited and Airport Rent A Car Limited The Planning Collective Limited
PO Box 591
Warkworth, 0941
Attn: [redacted]
[redacted]
[redacted]

Attachments:

1: AUP – OP Zoning Map
2: Photographs of subject sites and surrounding area (Captured 28/09/22)
3: Feedback Comments on the Draft Implementation of the Resource Management (Enabling Housing Supply and Other Matters Act 2021).

Attachment 1:

AUP-OP Zoning Map



Attachment 2:

Photographs of subject sites and surrounding area (Captured 28/09/22)














PRIVATE
PROPERTY







Attachment 3:

Feedback Comments on the Draft Implementation of the Resource Management (Enabling Housing Supply and Other Matters Act 2021).

#8541

9 May 2022

Auckland Council
unitaryplan@aucklandcouncil.govt.nz

Attention: Senior Policy Planner- Plans and Places Auckland Council.

Dear Sir/Madam,

[redacted] Glenvar Ridge Road, Long Bay – Feedback Comments on the Auckland Council Draft Implementation of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

Auckland Council has released a draft of how the Council intends to respond to the two Government led policy directions being the National Policy Statement on Urban Development and the Medium Density Residential Standards that are a part of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

Red Rhino Limited and Airport Rent A Car Limited are clients of The Planning Collective who are the land owners of [redacted] Glenvar Ridge Road in Long Bay. The sites are currently zoned Residential – Large Lot. A small portion of the land at [redacted] Glenvar Ridge Road being zoned Residential Single House. The sites are within both Long Bay Precinct A and Long Bay Precinct B. The draft Planning Maps do not propose to rezone the land. The subject sites and wider area are identified as *'Area Under Investigation'*.

The purpose of this letter is to provide feedback relating to the identified sites and the wider area.

In particular, the Consultation document notes that you are seeking feedback on the:

- *size of areas around our suburban town and local centres where additional height and housing density can occur and what the building heights and density limits are.*
- *The distances of walkable catchments where buildings of six or more storeys are required*

- *Other additional qualifying matters that should apply in Auckland*[1]

Description of the site

The subject sites at Long Bay are zoned Residential – Large Lot and Residential – Single House as identified above and collectively comprise approximately 20-ha of greenfield land. The sites are situated on the periphery of the existing urban area currently undergoing conversion from low-density to medium density housing. The sites have southern boundary frontage to Glenvar Ridge Road and are characterised by undulating topography sloping northwards towards Vaughans stream.

For the able-bodied, the sites are located within walking distance to the local centre, Long Bay Primary, Long Bay College, the football fields at Ashley Reserve, Long Bay Regional Park and Long Bay Beach.

A corridor of Significant Ecological Area traverses the northern portion of the sites. Across three of the five sites are Historic Heritage and Special Character overlays relating to Historic Heritage Places identified. These include Midden R10_990, Midden R10_989, Midden and Terraces R10_985, and Ditch and Bank, Pit R10-986. Also applying to the sites are Long Bay sub-precincts A, B and a very small area of sub-precinct D.

The Unitary Plan describes the Sub-precincts A and B as predominantly large lot residential land. Rural Residential Land is provided for in Sub-precinct B. Sub-precinct D provides for single housing, with some higher intensity integrated housing fronting the main roads and reserves. The land to the immediate east of the sites is owned by Templeton Long Bay North Limited and this land is currently under development for more intensive residential forms.

[1] Consultation Document: Government's new housing rules: What is means for Auckland.

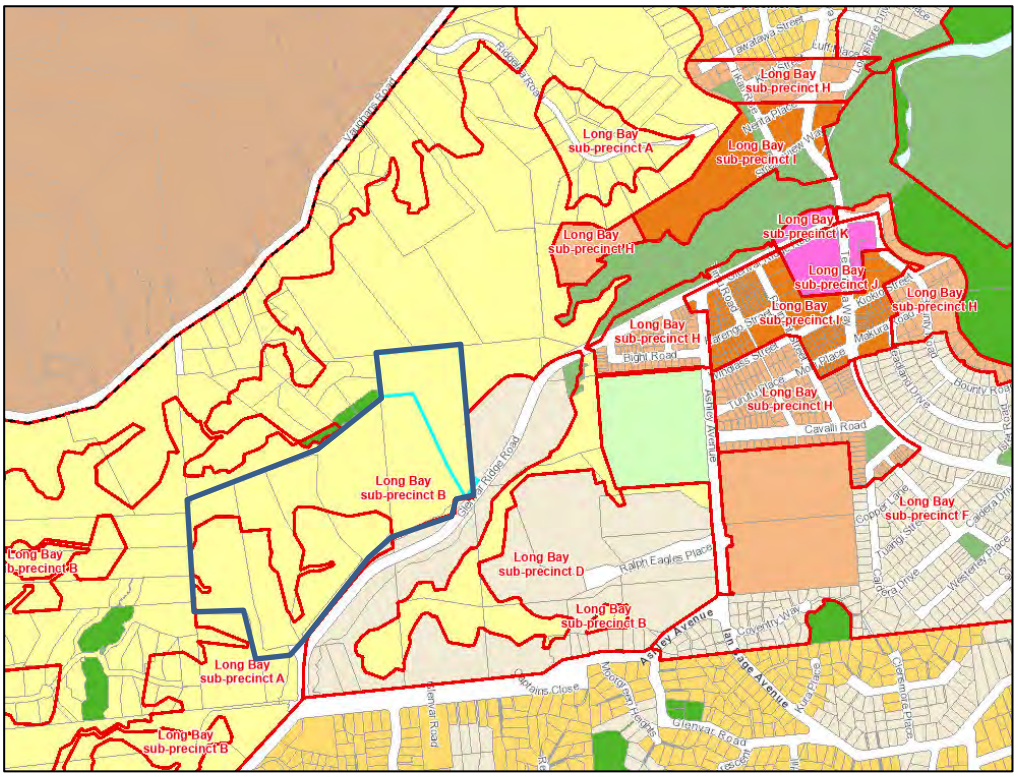


Figure 1- Zoning under the AUP-OP. The site is outlined in purple. (Source: AUP-OP GeoMaps 6/05/2022)

Walkable Catchments

Higher density residential development is proposed for sites within the catchment of small town centres or large local centres with high accessibility. These sites must be within a 3-minute walk or less; or located within a distance of 200m from the centre. The subject sites are located approximately 1km from the local Long Bay centre. A walk time to the centre will take the average person less than 10 minutes.

Auckland Council, in *The National Policy Statement on Urban Development and Medium Density Residential Standards, Auckland Council's Preliminary Response*, defines the environmental factors that contribute to the walkability of a catchment in the below points:

- Topography
- Street crossings
- Block size
- Land use mix
- Traffic volumes
- Perceived safety

Affects how far people can walk

Affects how far people want to walk

Walkability from the subject sites to Long Bay Local Centre is considered to be near ideal. Walking is facilitated by new, wide footpaths that span the length of Glenvar Ridge Road on both sides, three existing pedestrian crossings, flat topography along the urbanised section of the road, and the grass berm and landscaped setback of the footpath from the road that provides for pedestrian safety. Further

to this the area has high amenity value in terms of street landscaping, a variety of built form, coastal views and ease of access to reserves and open spaces.

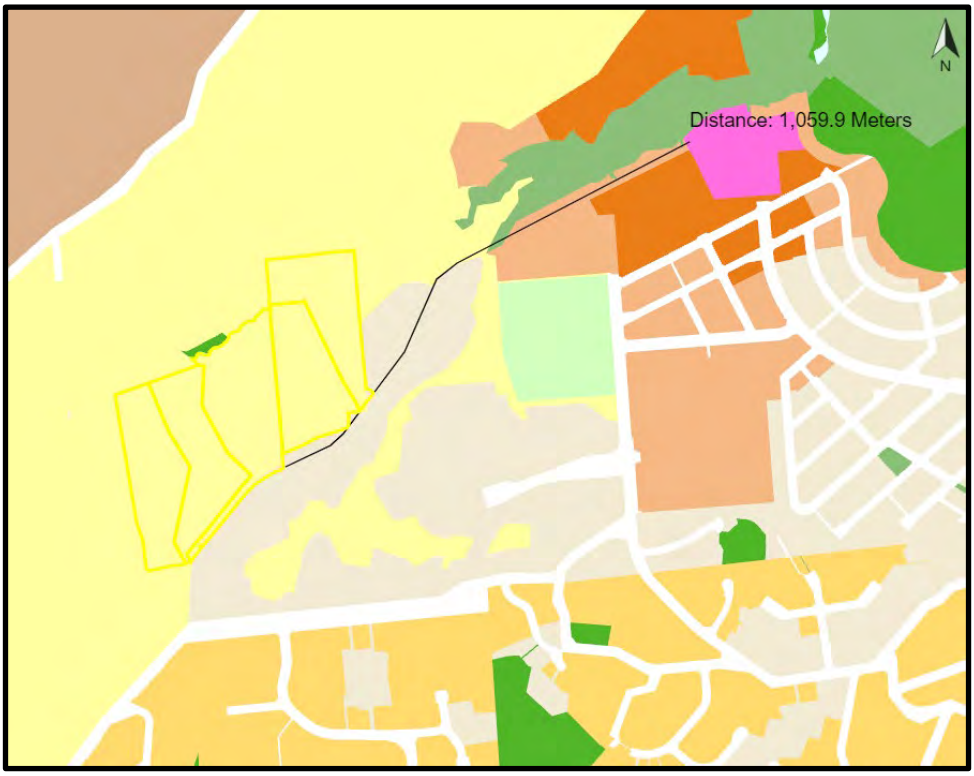


Figure 1: Distance from subject sites to Long Bay Local Centre (Source: Auckland Council GeoMaps).

Proposed Development

Our client are applying for a plan change to rezone the sites to enable a greater density of residential development on the land. They will then seek to apply for subdivision and landuse consents to develop the land. An indicative scheme plan for the proposed development is shown in Figure 3. The Plan Change and resource consents are due to be submitted later in 2022.

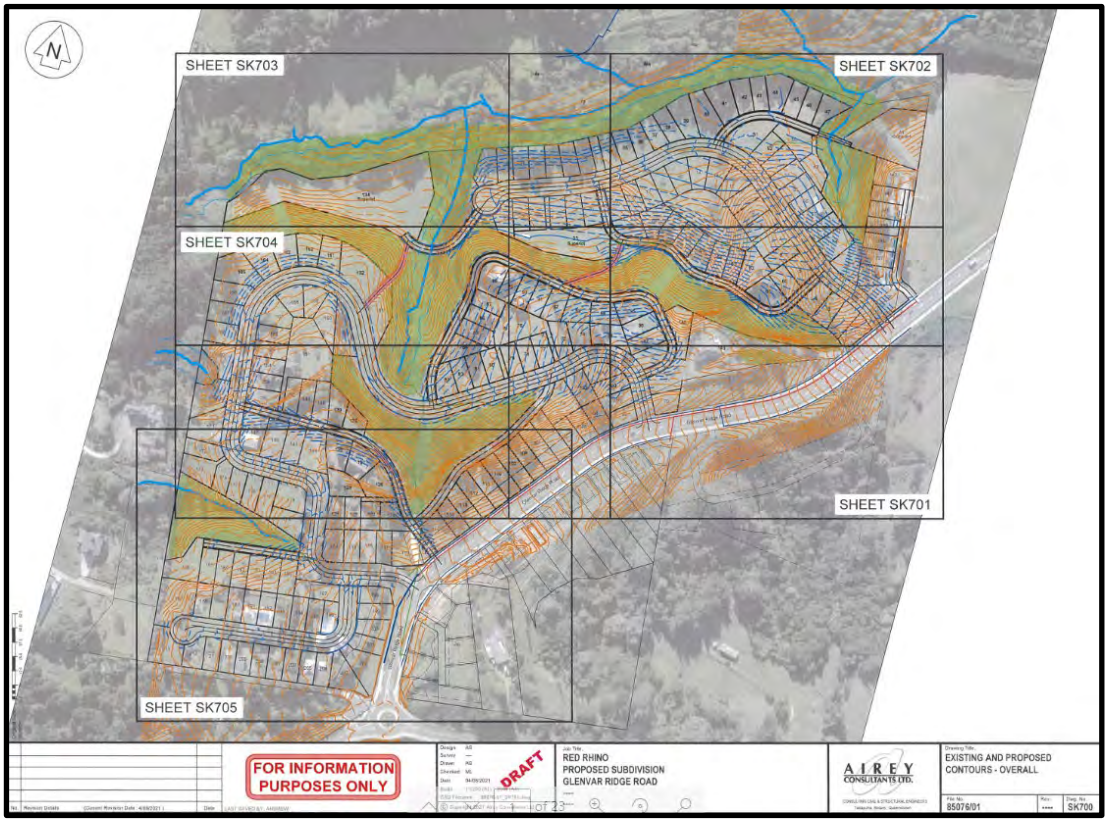


Figure 2: Preliminary plans (Source: Aireys Consultants Ltd)

Implications of the proposed draft zoning

Proposed Zoning

Auckland Council's *Preliminary response viewer for NPS-UD and MDRS* does not propose to rezone the sites. It is noted that the sites lie within an Area of Investigation as shown in Figure 3 below.

The qualifying matters applicable to the sites are the overlays and precincts stated in the description:

- Historic Heritage Place Overlay
- Significant Ecological Areas – Terrestrial
- Precinct Under Investigation
- Designation

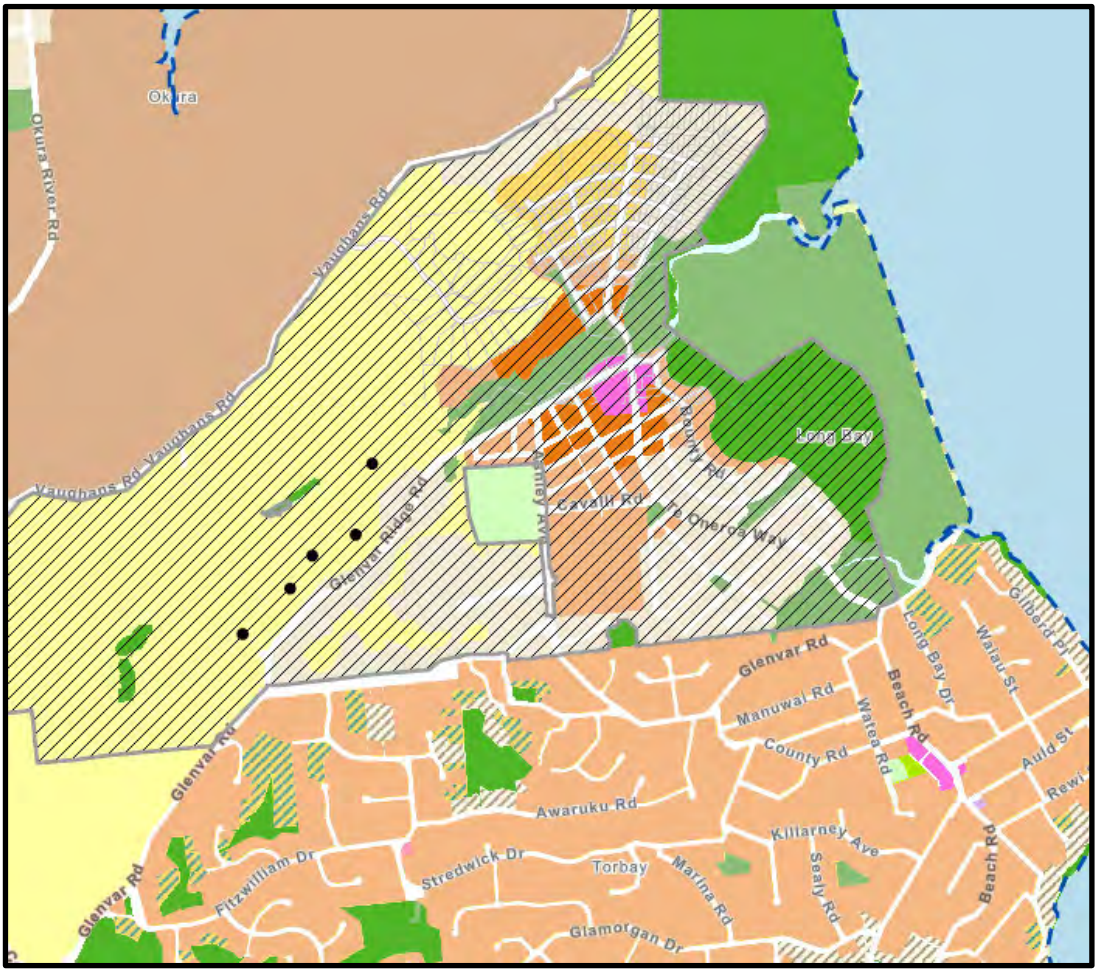


Figure 3: Draft Planning Maps. Sites identified by approximate black markers within Area of Investigation. (Source: Preliminary response viewer for NPS-UD and MDRS).

Implications

As shown on the draft Planning Maps above, the sites are situated within a precinct under investigation. This notation is supported and the submitter's wish to assist Auckland Council in any way to demonstrate that the land is in fact suitable for more intensive residential development to achieve the outcomes stated in the NPS: UD and the Enabling Housing Supply and other matters Act.

The Long Bay Precinct has enabled development of a new community on greenfield land in an integrated and sustainable way that protects and enhances the natural environment. Glenvar Ridge Road provides an opportunity for land to accommodate additional residential density without compromising Rural – Countryside Living zoned land further to the north.

The sites [redacted] Glenvar Ridge Road are located within approximately 1km walking distance, an approximate 10 minutes' walk of Long Bay Local Centre. There is also Public Transport options and the extensive reserve network at Long Bay in the immediate vicinity. Infrastructure can be upgraded to provide capacity to accommodate additional development. There are no known water supply or other constraints.

Whilst it is acknowledged that the Council has taken a blanket approach to exclude Residential - Large Lot zoned sites from the application of the MDRS, the sites unique split-zoning characteristics, greenfield development potential and proximity to existing local centres makes mixed housing urban zoning and related residential development a better, more efficient outcome for the land than the existing zoning pattern.

Summary

While Residential Large Lot zone is not under consideration as a part of the blanket approach taken to applying the Residential - Mixed Urban Zone, it is appropriate to look at these sites in the context of the surrounding zoning. The application of the Residential- Large Lot Zone in this location is no longer suitable for this site, when taking into account the adjoining zones, land uses and current development, the definition of the Residential - Large Lot Zone in the National Planning Standards and when considered in the context of the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. Rezoning provides a significant positive opportunity to enable a comprehensive approach to residential development on this land.

On behalf of the landowner/developer, we seek that the Auckland Council Policy Team up-zone the sites at [redacted] Glenvar Ridge Road, Long Bay. We can provide a more detailed zone markup area prior to notification of the Intensification Plan Changes in August this year. We can also provide s32 Analysis to support revised zoning patterns in this location. Please let us know if this would be of assistance to Auckland Council. Alternatively, an onsite meeting could be valuable. Please let us know.

Yours sincerely

[redacted]
The Planning Collective 2021 Limited
[redacted]

End of Report

End of Report