Future Development Strategy

Local Board Not Supplied

WRITTEN FEEDBACK
Volume 5

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

Future Development Plan 2023 #8576

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 see attached submission

Brittany Vari

From: [redacted]
Sent: Sunday, 30 July 2023 12:22 pm
To: Future Development Strategy
Subject: Submission to the proposed Future Development Strategy

To whom it may concern,
This is a private submission in objection to the proposed FDS by [redacted], being the owners of [redacted] Our objections relate primarily to the Opaheke "de-zoning" area in which our property is located. We are also supporters of the Drury and Opaheke Residents Group Submission.

Background

We have lived on our 1ha lifestyle block for over 25 years. During this time we have seen the zoning change from Rural to Future Urban (FUZ) which at the time seemed to be the inevitability of future urban growth. The FUZ rezoning process (which we supported) was properly notified and included a high degree of community involvement. The FUZ rezoning also changed the future outlook for our lifestyle block and it was apparent that our house and property would likely be bulldozed within the next 10 to 20 years. On this basis we decided that our land would become the most valuable commodity and not the house or improvements. We therefore made the deliberate decision not to spend our savings on upgrading and improving our property and instead cut back on work and took early semi-retirements and are now both fully retired. We can also no longer afford to make the improvements that we would have done. Should our land now be de-zoned back to Rural, as proposed by the FDS, we will have been denied, and continue to be denied, the better quality of life that was owing.

Objections

1. The proposed FDS has not been notified for community submissions, input or feedback which creates an air of suspicion as to its origins and purpose.
2. The FUZ zoning was properly and correctly implemented and is not flawed as suggested by the FDS.
3. Attempting to undo or reverse urban growth is futile.
4. The small pocket of rural land that the Opaheke de-zoning area will create will be unsustainable within the surrounding unban and rural-residential environment. I am thinking particularly of cattle trucks, milk tankers and other rural support vehicles having to travel to and fro though suburbia to service the land. Odours, sprays and noise will also be issues.
5. The de-zoning will deprive the landowners of the development opportunities for which they were previously entitled.
6. The affected land owners should be entitled to a rates refund should property values fall.
7. Planning for infrastructure growth was well underway with the Opaheke Road upgrade, land-take, plans already having been notified.
8. There are no flooding, land instability, or infrastructure issues that cannot be properly resolved, as previous determined by the FUZ.

Conclusion

The objectives of the FDS are seriously flawed and it should therefore be withdrawn in its entirety, or at least the Opaheke de-zoning area.

[redacted]

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Future Development Plan 2023 #8578

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#8578

Auckland Future Development Strategy 2023 - 2053

Submission from the Retirement Villages Association of New Zealand

31 July 2023

AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023-2053

RETIREMENT VILLAGES ASSOCIATION OF NEW ZEALAND INCORPORATED

To: Auckland City Council (*Council*)

INTRODUCTION

1 This is a submission on the Council's Draft Future Development Strategy 2023-2053 (*Draft Strategy*). The Retirement Villages Association of New Zealand Incorporated (*RVA*) welcomes the opportunity to provide feedback on the Draft Strategy.

2 The RVA and its members have a significant interest in how the Draft Strategy will impact on, and support, the provision of retirement villages in Auckland. There is currently a severe lack of appropriate housing and care for the ageing population. This situation is predicted to worsen as this population demographic is expected to grow substantially. The City will also experience increased growth and intensification as a result of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 and the National Policy Statement for Urban Development 2020 (*NPSUD*). As a result, the provision of additional retirement villages in Auckland is necessary and expected in the short to medium term.

3 The RVA has considerable concerns that the Draft Strategy will result in insufficient development capacity in Auckland. It has the potential to significantly impede the development of retirement villages (and other important housing). Specifically, the RVA is concerned with:

3.1 The Draft Strategy's failure to comply with the NPSUD;

3.2 The Draft Strategy's failure to adequately consider the ageing population and supply of retirement village accommodation;

3.3 Council's proposal to delay or stop live zoning of Future Urban Zones. This proposal would prevent urban development in specific greenfield areas that have previously been identified for future urban development, which will, in turn, restrict areas of potential development for retirement villages; and

3.4 The Draft Strategy's failure to recognise that retirement village and aged care developments have specific size and location requirements. Sites in existing urban areas which are appropriate for these developments are extremely rare. Council's proposal to delay or stop living zone of Future Urban Zones will significantly impact availability of sites for retirement village operators, and homes for retirees.

4 We set out in this submission further background to the retirement village industry and the main reasons for our requests.

5 The RVA notes it supports the relief sought by Summerset Group Holdings Limited (*Summerset*).

SUBMISSION CONTENT

6 This submission covers:

6.1 An introduction to the RVA;

6.2 An overview of the importance of retirement villages in addressing the housing crisis;

6.3 The RVA's key concerns with the Draft Strategy;

6.4 The RVA's main requests for the Draft Strategy; and

6.5 Conclusions.

THE RVA

7 Today, the RVA has 412 member villages throughout New Zealand, with approximately 41,500 units that are home to around 50,200 older New Zealanders. This figure is 96% of the registered retirement village units in New Zealand.[1]

8 The RVA's members include all five publicly-listed companies (Ryman Healthcare, Summerset Group, Arvida Group, Oceania Healthcare, and Radius Residential Care Ltd), other corporate groups (such as Metlifecare and Bupa Healthcare), independent operators, and not-for profit operators (such as community trusts, and religious and welfare organisations).

IMPORTANCE OF RETIREMENT VILLAGES IN ADDRESSING THE HOUSING CRISIS

Summary

- New Zealand and Auckland are facing a housing crisis, including a retirement living and aged care crisis. As acknowledged by the Council, population growth and its implications is a key challenge in Auckland.[2]
- The ageing population is increasing exponentially. This increase is reflected in Auckland's demographics.
- Demand for retirement housing and aged care is rapidly increasing and outstripping supply. Additional retirement villages in Auckland will be needed to meet the increasing demand.
- The retirement sector plays a key part in housing and caring for older people. The sector also helps ease demand on the housing market and produces broader benefits, such as employment and significant contributions to New Zealand's GDP.
- Deliverability of the retirement village pipeline and affordability is materially impacted by availability of suitable sites and planning controls.

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[1] There are also more than 6,100 occupation right agreements for care suites as part of the aged care system.

[2] Auckland Future Development Strategy 2023-2053: Consultation Draft (June 2023), page 12.

It is critical to ensure that sufficient land that is available and suitable for retirement villages is able to be accessed in order to prevent delaying the necessary supply of retirement villages.

9 New Zealand, including Auckland, is facing a housing crisis, including a retirement living and aged care crisis. There is a severe lack of appropriate housing and care for our growing ageing population. This problem is immediate and projected to worsen in the coming decades as older age groups continue to grow.

10 In 2021, the Government recognised the ageing population as one of the key housing and urban development challenges facing New Zealand in its overarching direction for housing and urban development - the Government Policy Statement on Housing and Urban Development (GPS-HUD).[3] The GPS-HUD records that "*[s]ecure, functional housing choices for older people will be increasingly fundamental to wellbeing*."[4]

11 A key connecting government strategy, *Better Later Life – He Oranga Kaumatua 2019 to 2034*, outlines what is required to have the right policies in place for our ageing population, including creating diverse housing choices and options.[5] The strategy notes that "*[m]any people want to age in the communities they already live in, while others wish to move closer to family and whānau, or to move to retirement villages or locations that offer the lifestyle and security they want*."[6]

12 Further, the strategy notes "*Local government also has a key role in making sure communities cater for the needs of their older populations. Urban planning and public transport, design of public spaces and provision of local facilities all affect older people's ability to stay in the community, to stay connected and physically active, and to feel safe*".[7]

New Zealand's ageing population

13 The proportion of older people in our communities compared to the rest of the population in New Zealand, and Auckland, is increasing greatly. Soon, there will be more people aged 65+ than children aged under 14 years.[8] By 2034, it is expected that New Zealand will be home to around 1.2 million people aged 65 and over, just over a fifth of the total population.[9]

14 The ageing population of New Zealand reflects the combined impact of:

14.1 Lower fertility;

14.2 Increasing longevity (due to advances in medical technology and increased survival rates from life-threatening diseases); and

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[3] The GPS-HUD was issued in September 2021 (available online).

[4] GPS-HUD, page 10.

[5] *Better Later Life – He Oranga Kaumatua 2019 to 2034* (available online).

[6] Ibid, page 32.

[7] Ibid, page 52.

[8] Ibid, page 6.

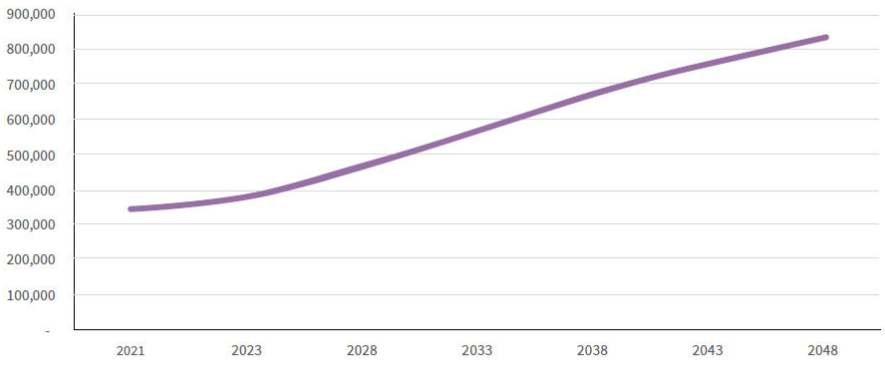
[9] Ibid.

14.3 The movement of the large number of people born during the 1950s to early 1970s into the older age groups.

15 The largest increases in the 65+ age group will occur in the 2020s and 2030s, when the large birth cohorts of the 1950s and 1960s (the "baby boomers") move into this age group.

16 The growth in the 75+ age bracket is also increasing exponentially (as illustrated by the graph below). It is estimated that 364,100 people in New Zealand were aged over 75 in 2022. By 2048, the population aged 75+ is forecasted to more than double to 804,600 people nationally.[10]

Figure 2 Total NZ 75+ population 2021-2048



Source: JLL Research; Statistics New Zealand

17 Older people aged 85+ comprise the most rapidly increasing age group in the country, with the numbers projected to almost triple from 93,500 in 2022 to 227,600 in 2048. Given around 45% of this age group require aged care beds, this growth will create a need for a minimum of an additional 84,700 aged care beds to be provided by 2048.

Auckland City context

18 The growth in the 75+ age bracket in the City is similar to that of the national average. Statistics New Zealand estimate that in 2023, 102,320 people are aged over 75. By 2048, this number is forecast to more than double to 245,980.[11]

19 The growth in the 85+ age bracket in the City is even more significant. Statistics New Zealand estimates that in 2023, 26,650 people are aged over 85.[12] By 2048, this number is forecast to more than triple to 85,500.[13]

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10 Statistics New Zealand, National Population Projections, by age and sex, 2022 (base) – 2073 <https://nzdotstat.stats.govt.nz/wbos/index.aspx#>.

11 Statistics New Zealand, Population Projections <https://nzdotstat.stats.govt.nz/wbos/index.aspx#>.

12 Ibid.

13 Ibid.

The retirement housing and care crisis

20 The under-provision of retirement living and aged care in New Zealand is at crisis point, with the growing ageing population facing a significant shortage in appropriate accommodation and care options.

21 The demand for quality living options is significantly higher than the current supply. The supply is decreasing due to closures of older style small and poor quality aged care homes, which are usually conversions of old houses. These homes usually do not offer living standards that residents expect and deserve.

22 At the same time, demand for retirement housing and care is rapidly increasing. This is due to the ageing population and longer life expectancy, coupled with a trend towards people wishing to live in retirement villages that provide purpose-built accommodation. This trend is creating a severe and growing shortage of retirement villages, as supply cannot match demand. Presently, 15.0% of the 75+ population live in retirement villages, a market share that has risen from around 9.0% of the 75+ population at the end of 2012.[14] It is likely that this rate will continue to increase over time.

23 The increasing demand for retirement villages is reflected in the development pipeline.[15] In 2021, there was a total of 216 villages in the development pipeline.[16] This development pipeline, if realised, will help ease the short-term anticipated shortfall in supply of quality retirement living and aged care options in New Zealand. However, further development of new villages, beyond the current pipeline, is needed to meet the longer-term predicted shortfall. It is anticipated that at least 10 new large scale villages each year are going to be required across New Zealand, just to keep up with demand over the next 20 years.

24 The COVID-19 pandemic has exacerbated the demands for retirement living options. Overall, retirement villages performed remarkably well in protecting the most vulnerable by providing safe communities and companionship during the tough periods of lockdown. This performance has resulted in an even stronger demand to access retirement villages and further limited the stock available.[17]

Addressing the retirement housing and care crisis

25 Retirement villages provide appropriate accommodation and care for the most vulnerable sector of our community. They allow older people to continue living in their established community, while down-sizing to a more manageable property (i.e. without stairs or large gardens). Retirement village living provides security, companionship and peace of mind for residents.[18] Residents will also, in most cases, have easy access to care and other support services.

26 Retirement villages already play a significant part in housing and caring for older people in New Zealand.

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[14] Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, July 2022, page 17.

[15] The 'development pipeline' refers to the development of new villages (both actual and planned).

[16] Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, June 2022, page 18.

[17] Ibid, pages 3 and 23.

[18] PWC 'Retirement village contribution to housing, employment, and GDP in New Zealand' (March 2018). Brown, N.J., "*Does Living Environment Affect Older Adults Physical Activity Levels*?". Grant, Bevan C. (2007) 'Retirement Villages', *Activities, Adaptation and Aging*, 31:2, 37-55.

27 Currently, the RVA's members have 412 villages across the country, including in Auckland, providing homes for around 50,200 residents. Over the next 5 to 10 years, that is anticipated to grow significantly with 152 new villages, 19 villages redeveloping and 71 expansions to existing villages, providing homes for approximately 30,470 additional residents. Retirement villages therefore will play a growing role in addressing the retirement housing and care crisis in New Zealand and in Auckland.

28 In Auckland, 15.0% of the 75+ age group population already live in a retirement village,[19] which demonstrates the high interest in retirement village living of older persons in the City. This interest, combined with the City's overall projected 75+ population growth, suggests there will be a significant increase in demand for retirement villages in the City.

29 There are currently 128 retirement villages in Auckland. Those retirement villages are home to around 15,400 residents. There are 42 new villages in development, with a further 13 villages expanding and 9 in redevelopment that will add an additional 8,017 retirement units. These villages will be home for around 10,400 residents. Despite this, a number of additional villages will be needed to meet the demands of the ageing population and high penetration rate in the City.

30 The RVA's members have established reputations for building high quality villages to address the needs of residents and employing professional and caring staff. Through this experience, retirement village operators have developed in depth and specialist knowledge and expertise in the development of purpose built retirement villages. Importantly, retirement village operators are not developers, and have a long term interest in their villages and residents.

31 Retirement villages also cater to a wide range of residents with differing levels of health and independence, offering a range of housing options and care to meet the specific needs of the residents. These are features that distinguish retirement village operators from typical residential developers, who generally do not deliver purpose built environments for the ageing population.

32 Retirement villages also help to ease demand on the residential housing market and assist with the housing supply shortage in New Zealand. That is because growth in retirement village units is faster than growth in the general housing stock. And, the majority of new villages are located in major urban centres. The retirement village sector therefore also contributes significantly to the development of New Zealand's urban areas, and in addressing the particular challenges urban areas face.

33 Build data from Statistics NZ shows that retirement village developments provided between 5% and 8% of all new residential developments between July 2016 and July 2021.

34 The retirement village sector also allows older New Zealanders to free up their often large and age-inappropriate family homes and move to comfortable and secure homes in a retirement village. The RVA estimates that around 5,500 family homes are released back into the housing market annually through new retirement village builds. This represents a significant contribution to easing the chronic housing

[19] Statistics NZ estimate 102,320 people aged +75 live in Auckland in 2023; with a resident population of 15,400, this equals a market share of 15.0%.

shortage. A large scale village, for example, releases approximately 300 houses back onto the market to be more efficiently used by families desperate for homes.

35 Retirement village operators are therefore well placed to help to address the retirement housing and care crisis. To do so, it is critical that suitable and available sites provide for retirement village development, particularly those located on urban fringes, as those sites are often ideal for the needs of retirement villages.

THE RVA'S COMMENTS ON THE DRAFT STRATEGY

Summary

The RVA's key concerns with the Draft Strategy include:

- **The Draft Strategy's failure to comply with the NPSUD:** the NPSUD provides the legal basis for preparing the Draft Strategy and sets out sources of information that must be considered in informing the Draft Strategy. The Draft Strategy does not comply with the NPSUD. The RVA seeks that the Council delay the adoption of the Draft Strategy in order to undertake more comprehensive consultation and further investigation into areas appropriate for intensification. The RVA also considers that Council did not adequately engage with the development sector when preparing its Draft Strategy, as is required by the NPSUD.

- **The Draft Strategy's failure to adequately consider the ageing population and supply of retirement village accommodation:** the NPSUD requires the Draft Strategy to consider Council's Housing and Business Development Capacity Assessment, which comments on the ageing population and housing challenges of older persons. The RVA seeks that the Draft Strategy adequately considers the ageing population and limited supply of retirement village accommodation. In doing so, the Draft Strategy should provide for suitable land to be made available for retirement village developments, not further restrict suitable land.

- **Council's proposal to delay or stop live zoning of Future Urban Zones:** this proposal would prevent urban development in specific greenfield areas that have previously been identified for future urban development, which will, in turn, restrict areas of potential development for retirement villages. The RVA seeks that appropriate greenfield development capacity is enabled under the Draft Strategy, particularly for retirement village operators. The RVA also seeks that the existing Future Urban Zones and timings for live-zoning of Future Urban Zones are retained.

The Draft Strategy does not comply with the NPSUD

36 The Draft Strategy fails to comply with the requirements of the NPSUD as it:

36.1 Does not provide for sufficient development capacity, and places too much reliance on intensification anticipated to be enabled through Plan Change 78 (*PC78*) (a process which is yet to be concluded);

36.2 Does not provide for well-functioning urban environments by failing to adequately consider the infrastructure constraints within existing urban areas, and the opportunities that greenfield development provide;

36.3 Does not give adequate consideration to available funding mechanisms for new greenfield development; and

36.4 Applies overly blunt principles to development in areas subject to natural hazard risks.

37 These matters are discussed in further detail in Summerset's submission. The RVA provides some additional comments below in relation to infrastructure constraints and restrictions in areas subject to constraints or natural hazard risks.

PC78 and infrastructure constraints

38 As mentioned, the Draft Strategy places too much reliance on PC78. PC78 is on hold while Council undertakes flood risk management assessments. This process may prove that further areas in Auckland are subject to flood constraints, meaning there is even less land available to develop. It is also noted that intensification enabled by planning provisions does not necessarily match what is practicably feasible. Many areas subject to rules permitting further intensification in Auckland are on land that has already been developed.

39 It is inappropriate for Council to rely on PC78 as a mechanism to ensure there is enough housing capacity in Auckland City given these uncertainties.

40 Delaying the adoption of the Draft Strategy until after PC78 comes into effect will allow Council to undertake an accurate assessment of development capacity and needs to inform decisions on the City's future growth.

Restrictions in areas with infrastructure constraints or areas subject to natural hazard risks

41 Retirement village operators are regular developers of complex sites involving a variety of constraints. Urban brownfield sites often have a variety of different challenges. Because of that experience, operators are well-equipped in finding solutions to complicated infrastructure and natural hazard issues. The scale of their sites and developments enable options which would not be available to smaller site developments. For example, retirement village developments often involve onsite management systems rather than relying on the public network.

42 Natural hazard issues can often be addressed through major stormwater detention and retaining other engineering tools, which again are available because of the scale of sites. It is important that the Draft Strategy does not unnecessarily constrain development on these more complex sites, including those subject to natural hazard risks.

The Draft Strategy must consider the ageing population and supply of retirement village accommodation

43 The NPSUD requires the Draft Strategy to consider the most recent applicable Housing and Business Development Capacity Assessment in informing the Draft Strategy.[20] Auckland Council's Housing and Business Development Capacity Assessment 2021 (*Assessment*) acknowledges that Auckland's population is ageing.[21] The Assessment recognises:[22]

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[20] NPSUD, cl 3.14.

[21] Housing Assessment for the Auckland Region (dated July 2021), at [3.6.4].

[22] Ibid.

> Over the next 30 years, a larger number of people will be aged 65 years and over. There can be challenges for older people to find suitable and affordable housing…

44 Despite this recognition in the Assessment, the Draft Strategy does not contemplate the ageing population in any detail, nor does it consider the limited supply of retirement village accommodation. This lack of recognition constitutes an additional failure to comply with the NPSUD.

45 The NPSUD also requires Council to engage with the development sector when preparing its Draft Strategy.[23] The RVA's understanding is that Council has only engaged with the development sector through a limited survey, and consultation with the Property Council. The RVA considers the extent of this engagement to be inadequate to meet Council's obligations under the NPSUD. Further consultation with the development sector is required in order for Council to have a sound understanding of development feasibility and land requirements. The RVA notes that the retirement sector has particular feasibility and land requirements, which differ from typical housing.

Council's proposal to delay or stop live zoning of Future Urban Zones

46 Sites in existing urban areas which are appropriate for retirement village and aged care developments are extremely rare, due to size and location requirements. As such, sites on urban fringes that provide good amenity and access to services (e.g. health facilities, restaurants and cafes, etc.) are often ideal for retirement villages.

47 The Draft Strategy seeks to remove or delay the live zoning of certain Future Urban Zones for development and increase the reliance on infill developments. The Future Urban Zones that the Draft Strategy seeks to remove or delay[24] are at the urban fringes of Auckland.[25] Removing or delaying the live zoning of these Future Urban Zones will restrict the already limited number of sites for potential development of retirement villages.

Importance of enabling development in urban and urban fringe areas

Size requirements

48 Sites of the required size for retirement villages are highly unique and valuable resources in our larger cities, including Auckland. They need to be efficiently used if the housing needs of the ageing population are to be met.

49 RVA member sites are typically large, sometimes several hectares for larger villages. Sites of the necessary size in existing urban areas are particularly difficult to find. Where operators are able to find sites in existing areas within cities, the value of the land is higher. The cost of sites will be worsened if supply is further constrained through stopping or delaying Future Urban Zones. As a result, operators will have to build higher in order to make efficient use of these sites. Higher buildings result in greater complexity through the consenting and construction phases. Such developments will also result in an increase in costs, which eventually drive up costs

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[23] Clause 3.15(2)(f), NPSUD.

[24] Kumeū-Huapai, Takaanini, Drury-Ōpaheke (Slippery Creek), Hatfields Beach, Warkworth North-east and Warkworth South, Dairy Flat, Wainui East, Upper Ōrewa, Kumeū-Huapai, Riverhead, Albany Village 2 and Oruarangi 2.

[25] The Auckland Future Development Strategy 2023-2053: Consultation Draft (June 2023), page 39. The Draft Strategy, page 6, also defines 'Future urban areas' as new greenfield areas to be established on the fringe of the existing urban area, and in rural and coastal settlements.

for residents. This impact on housing affordability as a result of the Draft Strategy's further constraints is contrary to Objective 2 of the NPSUD.

50 Council's Housing and Business Development Capacity Assessment 2017 recognises that the economics and space requirements of the retirement sector differ significantly from most private sector housing.[26] Density of retirement villages (dwellings per hectare) is typically considerably higher than for private dwellings, so that land requirements for this sub-sector cannot be directly equated with that for standard private dwellings.[27]

51 The Draft Strategy recognises that large format retail activities may struggle to find suitable locations in intensified areas due to their size.[28] It states that protection of existing and planned business zoned land for business purposes, in addition to provision of new development areas, is intended in order to address this shortfall in the medium to long-term.[29]

52 As set out above, RVA operators similarly struggle to find appropriate sites for development due to size requirements. This challenge should likewise be recognised and provided for within the Draft Strategy.

Location requirements and ageing in place

53 The RVA's members' experience is that older people want to stay in the communities in which they currently live, and have lived for many years, during their retirement. This is called 'ageing in place'. It allows residents to remain close to their families, friends, familiar amenities and other support networks. It promotes activities that improve residents' wellbeing, including physical activity, social engagement and intergenerational activity, due to the easily accessible surrounding destinations in a familiar neighbourhood. It provides access to public transport to facilitate these activities as independent driving ability declines and climate change impacts increase. It also allows residents to continue to play an integral part in the communities that they have helped establish.

54 Operators often seek to develop retirement villages at the fringes of urban areas (such as future development zones). These areas are good locations for retirement villages as they provide for the size requirements of retirement villages in addition to allowing residents to age in place and remain connected to their communities. The impact of delaying or stopping the live zoning of Future Urban Zones will therefore be significant for the retirement village industry.

55 While there are a number of successful brownfield retirement village developments in Auckland, examples of these have been on unusually large brownfield sites. Such sites are extremely rare.

56 To meet the housing needs of the ageing population and allow older people to "age in place", it is important that the Draft Strategy does not remove the ability for operators to develop in Future Urban Zones.

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[26] National Policy Statement on Urban Development Capacity 2016: Housing and business development capacity assessment for Auckland (dated December 2017), at [6.2].

[27] Ibid.

[28] Auckland Future Development Strategy 2023-2053: Consultation Draft (June 2023), page 31.

[29] Ibid.

Relief sought

57 Consistent with the relief sought in Summerset's submission on the Draft Strategy, the RVA seeks that:

57.1 the Draft Strategy'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;

57.2 the Council prepare and release the Draft Strategy's implementation plan for consultation in conjunction with the Draft Strategy for public consideration;

57.3 the Council delay the adoption of the Draft Strategy to be in conjunction with the adoption of the next Long Term Plan and confirmation of PC78;

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

57.5 infrastructure triggers are removed where serviceability is enabled through the use of existing tools;

57.6 a more nuanced and risk-based approach is taken to natural hazards; and

57.7 the existing Future Urban Zones and timings for live-zoning of Future Urban Zones are retained.

CONCLUSION

58 The RVA looks forward to engaging constructively with the Council in relation to the Draft Strategy. The RVA seeks to ensure the Draft Strategy achieves the best outcomes for Auckland through appropriately identifying how and where Auckland should grow over the next 30 years.

59 If there is an opportunity to speak to this submission, the RVA wishes to be heard. If others make a similar submission, the RVA will consider presenting a joint case with them at a hearing.

[redacted]

Executive Director

Contact details:

Retirement Villages Association

[redacted]

Future Development Plan 2023 #8579

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 may be 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.
The FDS should strike a balance between providing for urban consolida on and greenfield development to contribute to housing supply, affordability and choice.

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

There Future Urban land in question is located close near to existing employment areas, educational facilities (schools and early learning centres), open spaces and services within the Huapai and Kumeu town centre areas.
In any event, proximity to workplaces, services, facilities and shops are matters that are typically addressed in detail in plan changes. 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

Significant hazard risks do need to be defined and responded to. Flooding has been and will continue to be an issue for land development. The recent flood events do bring the issue to the forefront of mind. However, there are many good examples of where flood hazards can be effectively managed. The presence of a risk should not render land unsuitable for development. Greenfield development often responds better, and the response is more efficient, in terms of managing potential hazards. The existing policy and legal framework require hazard risk to be fully assessed through any proposed plan change process.

The removal of future urban areas due to the presence of a potential flood risk does not allow for land developers to put forward a sustainable urban development option that is fit for purpose for the site or area in question.
The identification of the need for further investigation and removal of the future urban land for this reason limits the ability to provide for all types of housing and commercial spaces to meet the demands of Auckland growing population.

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

The provision of nature-based infrastructure can be better achieved via greenfield development in which infrastructure provision can be more efficient and responsive to issues such as flooding and the impacts of climate change.

Other feedback

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

The approach taken in the FDS will not achieve the purpose of the FDS, nor is the approach based on accurate and comprehensive research. The FDS should provide opportunities for both urban consolidation and greenfield development of Future Urban areas to facilitate a well-functioning urban environment that provides both housing and business land supply, affordability and choice.

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 submitter seeks that the FDS be amended to:

• Retain all Future Urban land within Kumeu and Huapai, including the submitters land at 314 Matua Road, Huapai.

• That the timing for urbanisation of the future urban areas in Kumeu and Huapai being retained as 2028 - 2032 as set out in the FULSS.

The submitter wishes to be heard in support of their submission and request hearings be held to facilitate this outcome.

28 July 2023

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

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY

This Feedback details the submitter, the affected property and responds to the provisions of the FDS in high-level 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: [redacted]

Property or Interest Affected by the FDS: [redacted]

Address for Service

Name: The Planning Collective
[redacted]

Email Address: [redacted]

Phone: [redacted]

Property Details

The submitter owns the land at [redacted] and comprises of 11.8 hectares. The site is presently utilised for rural lifestyle activities and contains a dwelling, private horse stables and arena. The site is accessed via an access leg from Matua Road and adjoins the Kumeu River to the north. An aerial image of the site is provided in Figure 1 overleaf.

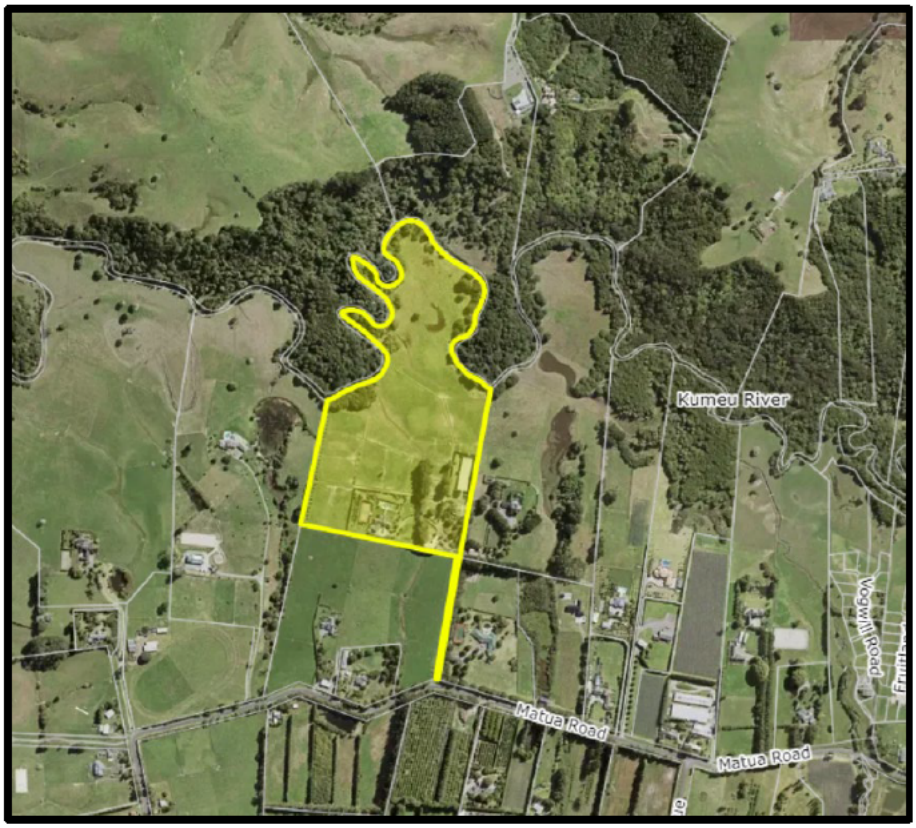


Figure 1 - Aerial image of [redacted] (source: Grip Maps, July 2023)

The site is zoned Future Urban in the the Auckland Unitary Plan (Operative in Part) (**"AUP-OP"**) as shown in Figure 2 below. The northern portion of the site is covered by the Outstanding Natural Landscapes Overlay and the vegetation adjoining the Kumeu River is identified as a Significant Ecological Area.

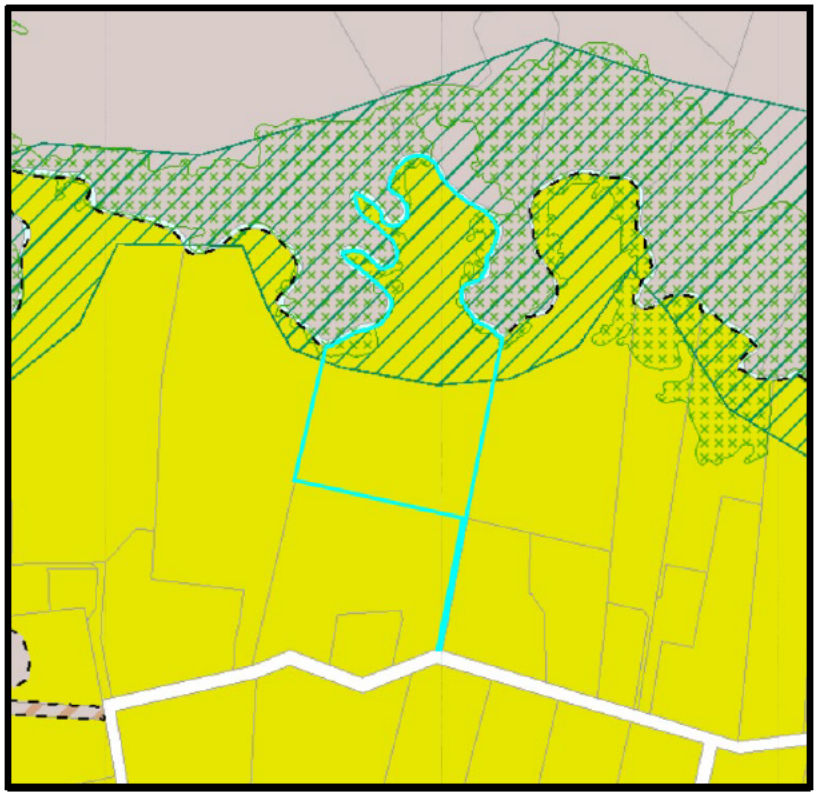


Figure 2 - AUP-OP Maps (source: AUP-OP Maps, July 2023)

Figure 3 below shows the location of the site in terms of the Future Urban land surounding the Kumeu-Huapai Area.

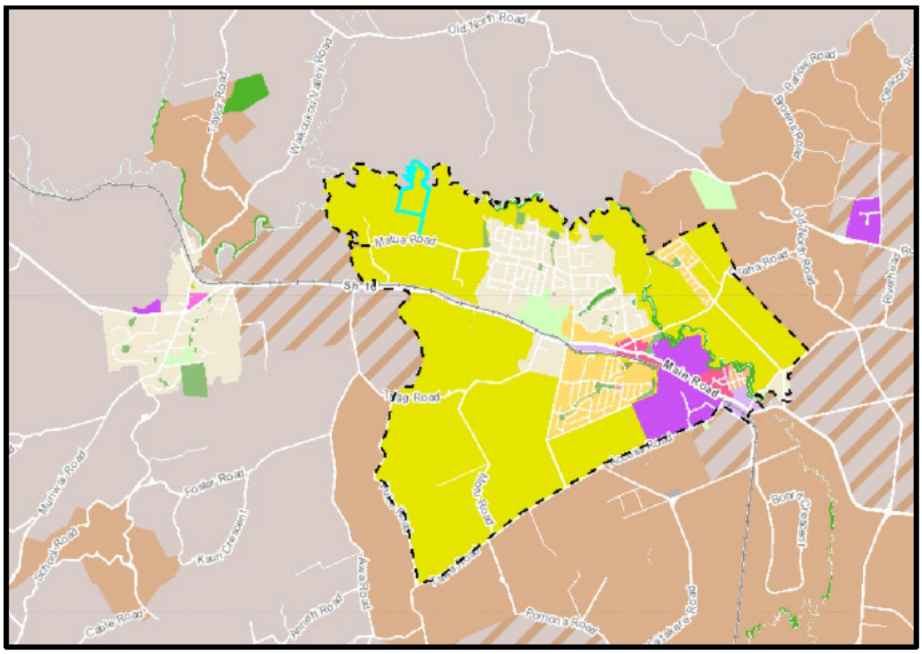


Figure 3 - AUP-OP Maps (source: AUP-OP Maps, July 2023)

The site is identified within the Kumeu-Huapai future urban area in the Auckland Council Future Urban Land Supply Strategy 2017 (**"FULSS"**). The FULSS identifies the land as being '*development ready*' between 2028-2032.[1] Refer to Figure 3 below for further context.

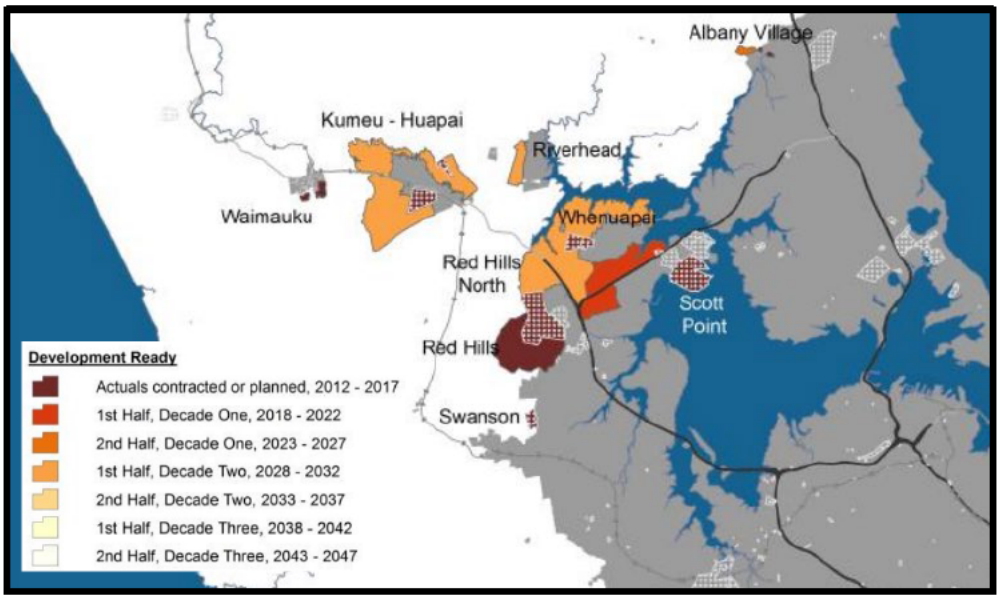


Figure 4 – Future Urban Land Supply Strategy for Kumeu-Huapai area 2017

There is presently no Auckland Council, or other structure plan to guide the future land use or development for this area of Future Urban zoned land, however strategic land use plans to inform transportation planning have been prepared.

[1] Refer to Table 1, page 13 of Auckland Council Future Urban Land Supply Strategy 2017.

The Auckland Council Spatial Land Use Strategy- North West 2021 (**"SLUS"**) was prepared to inform future transport networks for the Kumeu-Huapai, Riverhead and Redhills North future urban areas. The SLUS outlines that there is uncertainty regarding the future land uses for Kumeu-Huapai, particularly given that there has been no structure planning of the future urban area. The SLUS identifies the preferred option for the future land use of the site as 'Future Residential or Other Uses' as shown in Figure 5 below.[2] The land is located within proximity to a future neighbourhood centre along Matua Road.

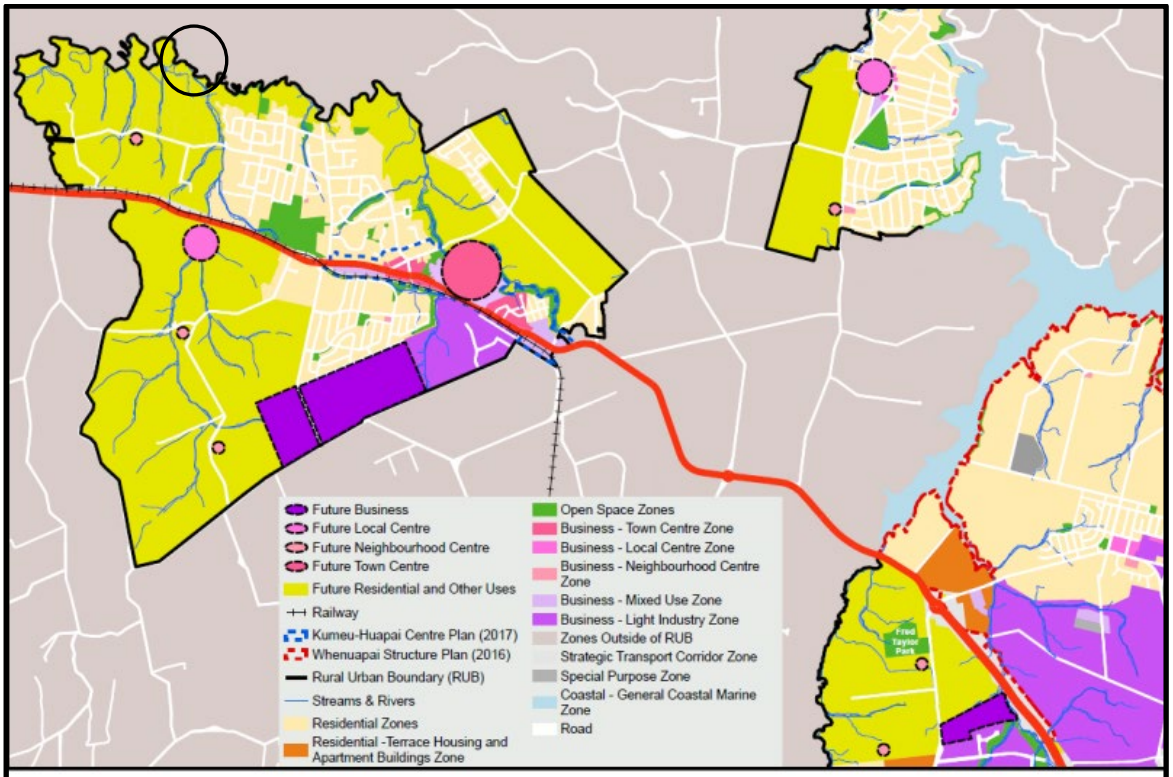


Figure 5 – Spatial Land Use Strategy for North-West Auckland

Auckland Transport have submitted Notice of Requirement applications to designate in the Huapai-Kumeu area for the purpose of upgrades the State Highway 16 Corridor, a rapid transit station in Kumeu and Huapai, and an associated rapid transit corridor. The purpose of these Notice of Requirement applications is to develop a strategic transport network to support Auckland growth areas.

High-Level 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".*

[2] Refer to Figure 1, page 5 of Auckland Council Spatial Land Use Strategy- North West 2021.

The FDS has to apply to the urban environments of Tier 1 Local Authorities i.e., Auckland.

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.

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.

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 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 forms an important statutory document to guide the funding timeframes for infrastructure and projects within the Auckland Region and the upcoming Unitary Plan review process due to commence in 2026. It is vital that a comprehensive and researched approach is taken to drafting the FDS and that this work is undertaken in partnership with public and private sector professionals to ensure that the FDS will deliver a well-functioning urban environment now and over the long-term; this does not presently appear the case.

It is apparent that Council has initiated a kneejerk about-face in respect of 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 Housing and Business Development Capacity Assessment ("HBA") and preference for ad-hoc infill development 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 and infrastructure growth charges.

The submitter requests that the FDS recognises and reinforces the significant role of future urban areas (for Auckland, the "Future Urban Zone") 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.

Consultation and Engagement:

Clause 3.15 (2) and Clause 3.16 of the FDS states that when preparing an FDS, local authorities must prepare the draft using the Special Consultative Procedure in s83 of the Local Government Act 2002, and that the local authority must engage with the development sector to identify significant future development opportunities and infrastructure requirements. Clause 3.16 (2) requires that for a review of the FDS, the review must also include engagement with the development sector and landowners.

When preparing documents such as the FDS, Auckland Council must be guided by the overarching purpose of the local government which is:

> *(a) to enable democratic local decision-making and action by, and on behalf of, communities; and*
>
> *(b) to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future.*[3]

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. This includes decision-makers from land developers in person in relation to their submissions as part of the Special Consultative Procedure. The purpose being (as set out above) to achieve well-functioning urban environments in existing and future urban areas now and over the long term (30 years).

The drafting of the FDS provides a key opportunity for the private and public sector to work together to achieve quality planning outcomes for the current and future anticipated residents of Auckland. The Council have not adequately engaged with the development sector which has resulted in the creation of an FDS which does not achieve the statutory requirements of the NPS-UD and Local Government Act 2002. The outcome is an FDS which is not fit-for-purpose and does not adequately provide for the needs of the current and future Auckland population.

Site Specific Feedback

The FDS recommends that the Future Urban zoned land at Kumeu - Huapai be subject to further investigation and delays the urbanisation of the land to 2050+. The FDS also recommends removal of areas of the Future Urban land which includes the submitters land - refer to Figure 6 below for further information.

[3] *Part 2, Sub-Part 1, Section 10(1) of the Local Government Act 2002 - Purpose of Local Government*

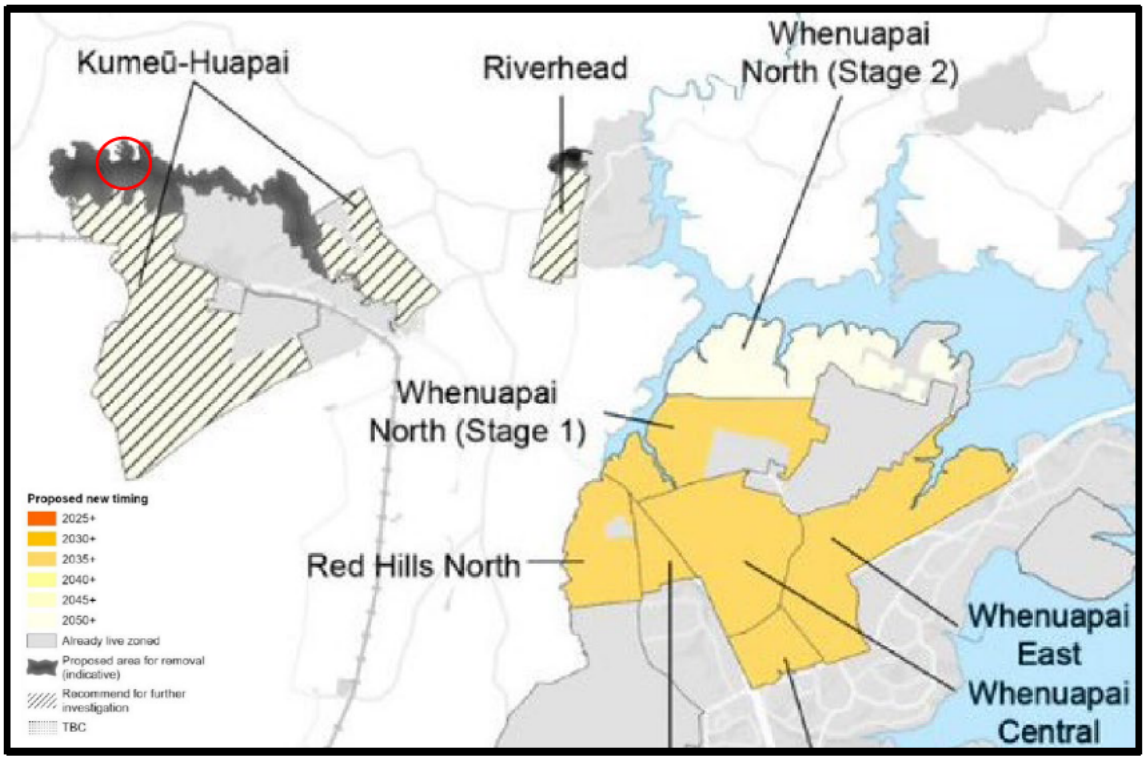


Figure 6 - FDS Proposed timing and approach for Kumeu-Huapai. Red circle identifies location of submitter land at 314 Matua Road, Huapai

The FDS seeks to partially remove the Future Urban zoning at Kumeu-Huapai as it is identified that parts of the future urban area are not suitable for development for the following reasons:

- *Significant hazard constraints, including approximately 30% of FUA covered by a 1% annual exceedance probability (1% AEP) flood plain. Portions of the Kumeū-Huapai-Riverhead FUA proposed for removal are parcels entirely or mostly within this floodplain extent and have few appropriate land uses.*

- *• Potential for higher VKT and CO2 emissions than other FUAs due to Kumeū-Huapai-Riverhead FUA being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs.*

The area of future urban land recommended for removal largely correlates with the land identified as being within a floodplain area.

Additionally, the FDS seeks that the Future Urban land in Kumeu-Huapai be subject to further investigation for the following reasons:

Infrastructure

- *Transport infrastructure is not planned to support development before 2050+. Rapid transit, frequent transit routes, key arterials and upgrades and provision of active modes are required to support development and achieve strategic outcomes.*

Natural hazards

- *In addition to the 30% of the FUA covered by a 1% AEP flood plain, due to the FUA's location in the upper section of the Kaipara-Kumeū flood plain, an increase in impervious area associated with future development could also impact flooding downstream of the FUA from the existing Kumeū-Huapai township all the way through to Parakai. Some geohazards are also present (possible liquefaction damage and high risk of slope instability in the northern portion of the FUA) and softer soils with risks of settlement relating to the Puketoka geological formation. Further work is required to model the extent of flooding effects downstream if the wider Kumeū-Huapai FUA is developed.*

Emissions/VKT reduction

- *Potential for higher VKT and CO2 emissions than other FUAs due to Kumeū-Huapai being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs.*

This submission demonstrates that these reasons are insufficient and flawed for the Future Urban land at Kumeu-Huapai, and specifically for the submitters land, for the following reasons:

Significant Natural Hazard Constraints:

- The Kumeu-Huapai Future Urban Zone area is subject to watercourses, overland flowpaths, rivers and areas of flooding, largely due to the Kumeu River which runs along the northern fringe of the future urban area and through the centre of Kumeu as shown in Figure 7 below.

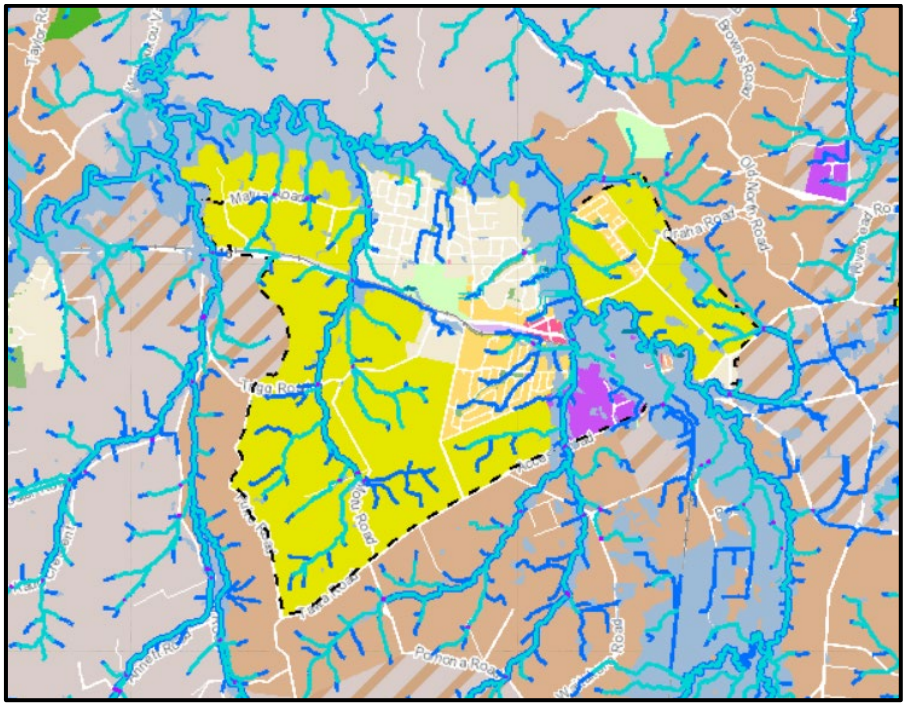


Figure 7 - AUP-OP Maps with Catchment and Hydrology layer overlaid (source: Grip Maps, July 2023)

- It is not appropriate for the Council to take a haphazard approach to removing Future Urban land subject to natural hazards. The recent flood events highlight the need to plan for natural hazards, however there are many good examples of where flood hazards can be effectively

managed. The presence of a risk should not render future urban land as unsuitable for development. Greenfield development often responds better, and the response is more efficient, in terms of managing potential hazard risk.

- A structure planning and plan change process is a more appropriate pathway to assess the options and detail associated with issues such as natural hazards. It is at this stage that a location-specific assessment of natural hazard risk can be undertaken and tested via the structure planning or private plan change process, and the most appropriate use of the land can be determined.

- I understand that the Council's latest flood modelling date is based on 3.8m° increase in temperature to account for climate change and has been prepared on the assumption that all available land will be developed. This modelling contradicts the Auckland Council's Code of Practice which requires 2.1m° increase in temperature to account for climate change and is based on false pretenses - it is idealistic that all land available for development will in fact be developed. This demonstrates that the FDS is not based on correct or realistic information.

Infrastructure:

- The delivery of the Notice of Requirement applications should not hinder the urbanisation of land. It is more appropriate to align the structure planning and live-zoning of urban areas with the provision of transport infrastructure upgrades. Infrastructure is a key consideration during the plan change process and

- The FDS notes the Council has financial constraints which are negatively impacting infrastructure provision. However, the solution is not to somehow try and stop greenfield development for a decade. If the problem is funding infrastructure, then the solution is to find innovative ways to fund infrastructure. That infrastructure is not solely supporting development, it is also supporting the wider economy and community which contributes to a well- functioning city.

- Experience tells us that Council can't do this alone. Implementation of the current FULSS is not being fully realised, but what is being delivered is largely because of the initiative and investment by the private sector. Since the FULSS, there has only been one Council led public plan change. Council instigated the Whenuapai plan change but that was withdrawn. Left to Council, areas identified as suitable for growth will not be realised any time soon. The development sector as a whole is the single biggest contributor of housing into Auckland by a substantial margin. The same is true for business land.

- It is important that the private and public sectors work together and achieve the combination of urban consolidation, greenfields development, and the expansion of satellite townships needed. The only way to solve housing and infrastructure capacity issues is through partnership with the private sector. A more agile rather than restrictive strategy is called for.

Emissions/VKT reduction:

- The rationale that Kumeu and Huapai are distant from high quality existing and planned public transport networks, wide range of jobs, education and other services is incorrect.

- As outlined above, Auckland Transport have applied for Notice of Requirements to designate land within the Kumeu and Huapai area to facilitate upgrades to State Highway 16, provision of a rapid transit network and rapid transit stations within both Huapai and Kumeu.

- The Future Urban land in question is located close to existing employment areas, educational facilities (schools and early learning centres), open spaces and services within the Huapai and Kumeu town centre. The land is also located near to Riverhead to the east and developing areas to the south such as Whenuapai and the Westgate/Massey area. The planned future transport routes will facilitate greater alternative means of transport from Huapai and Kumeu to the wider Auckland region.

- Separate to the above, the FDS has taken an inconsistent approach to applying emissions/VKT reduction as a rationale for investigating or potentially removing areas of Future Urban land in Auckland. Specifically, the future urban areas within Clarks Beach and Glenbrook Beach have not been identified as being ready for urbanisation in 2030+. These areas of Future Urban land are relatively isolated, heavily rely on private vehicles for travel to areas of employment.

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?

The above assumptions are not based on factual evidence. Evidence indicates that greenfield land may be 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.

The FDS should strike a balance between providing for urban consolidation and greenfield development to contribute to housing supply, affordability and choice.

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?

There Future Urban land in question is located close near to existing employment areas, educational facilities (schools and early learning centres), open spaces and services within the Huapai and Kumeu town centre areas.

In any event, proximity to workplaces, services, facilities and shops are matters that are typically addressed in detail in plan changes. 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:

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?

Significant hazard risks do need to be defined and responded to. Flooding has been and will continue to be an issue for land development. The recent flood events do bring the issue to the forefront of mind. However, there are many good examples of where flood hazards can be effectively managed. The presence of a risk should not render land unsuitable for development. Greenfield development often responds better, and the response is more efficient, in terms of managing potential hazards. The existing policy and legal framework require hazard risk to be fully assessed through any proposed plan change process.

The removal of future urban areas due to the presence of a potential flood risk does not allow for land developers to put forward a sustainable urban development option that is fit for purpose for the site or area in question.
The identification of the need for further investigation and removal of the future urban land for this reason limits the ability to provide for all types of housing and commercial spaces to meet the demands of Auckland growing population.

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?

The provision of nature-based infrastructure can be better achieved via greenfield development in which infrastructure provision can be more efficient and responsive to issues such as flooding and the impacts of climate change.

Conclusions and Outcomes Sought

The approach taken in the FDS will not achieve the purpose of the FDS, nor is the approach based on accurate and comprehensive research. The FDS should provide opportunities for both urban consolidation and greenfield development of Future Urban areas to facilitate a well-functioning urban environment that provides both housing and business land supply, affordability and choice.

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 submitter seeks that the FDS be amended to:

- Retain all Future Urban land within Kumeu and Huapai, including the submitters land at 314 Matua Road, Huapai.
- That the timing for urbanisation of the future urban areas in Kumeu and Huapai being retained as 2028 - 2032 as set out in the FULSS.

The submitter wishes to be heard in support of their submission and request hearings be held to facilitate this outcome.

Yours sincerely



End of Report

Future Development Plan 2023 #8580

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

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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?

Tell us why

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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.

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Tell us why

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

Tell us why

Other feedback

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

#8580

Barker & Associates
Auckland

PO Box 1986, Shortland Street, Auckland 1140
Level 4, Old South British Building, 3-13 Shortland Street, Auckland

B&A
Urban & Environmental

31 July 2023

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

Submission on the Draft Future Development Strategy

Introduction

This is a submission on the draft Future Development Strategy (**FDS**) on behalf of Ardmore Airport Ltd (**Ardmore**). The FDS was notified for submissions on the 6th June 2023.

Background to Ardmore Airport

Ardmore has owned a 155ha landholding in Ardmore since 1995 (refer **Figure 1**). This land is occupied by the Ardmore Airport, which comprises two runways and was established on the site in the 1940's during World War II. Since the 1950's the airfield has been used for general aviation purposes (no scheduled flights depart from Ardmore Airport) and approximately 20-years ago the east-west running runway was decommissioned.

Ardmore Airport has grown to become the country's premier facility for general aviation and flight training and is currently the fourth busiest airport in New Zealand. The airport is currently operating at less than half of the consented airspace capacity so there is room for more growth. There are over 105 airport tenants currently on the airfield, which employs over 650 people.

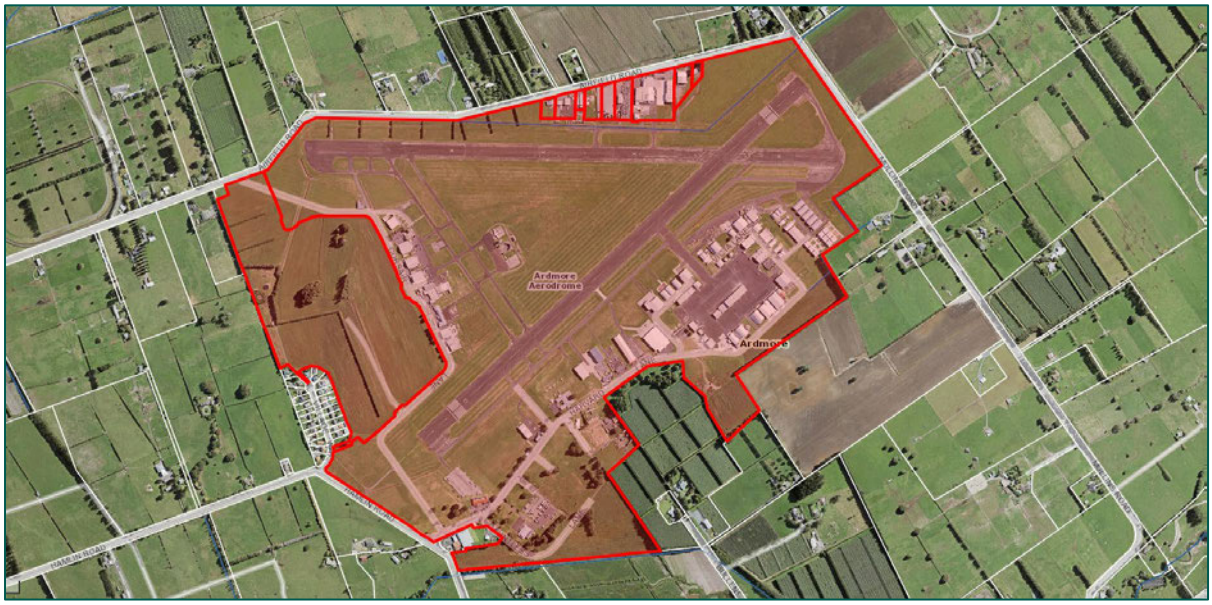


Figure 1: Ardmore Airport Ltd landholding.

Over the last few years, Ardmore has begun developing their landholding for industrial and non-aviation activities in the northern part of the site, to make efficient use of the land where the decommissioned second runway is located. This is to provide supplementary income for the airport which will support its ongoing operation.

Summary of Submission

Ardmore notes that the Council is required to prepare an FDS in accordance with subpart 4 of Part 3 of the National Policy Statement on Urban development (NPSUD). Ardmore is supportive of the response to growth within Auckland being led by a robust FDS. This is the first planning step in providing for growth and ensuring it is integrated with the provision of infrastructure at a strategic level.

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. 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. Not doing this, risks the Council zoning land and/or providing infrastructure in less efficient locations – that outcome would be more expensive overall.

The importance of getting it right is brought into sharp focus in Auckland, where the stakes are high. Auckland contributes 40% to the GDP of New Zealand, and ensuring that there is sufficient land supply for business and housing is an important plank in the economic development of the city and the prosperity of its people. Providing enough land supply enables opportunities for high-value businesses to grow and employ more people, and supports the delivery of a greater range of housing choices by the market. If the strategy is not right – this may constrain the economic development of the region with negative consequences for the New Zealand economy as a whole.

In the case of the draft Auckland FDS, there has been very limited engagement with the development sector, extending only to an email survey of parties which have been issued a building consent within the last six months. This is a significant flaw in the process, and has meant that the Council team has not had the opportunity to consider latest information on development plans being progressed, which would provide a more complete picture of the strategic drivers of growth and market attractive areas for business and residential development. We provide further detail on Ardmore's plans for developing part of the airport land for business below.

In addition to these over-arching matters, Ardmore 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.

In particular:

- Ardmore is concerned that more transparency/rigour is needed around the capacity analysis that underpins the draft FDS to ensure this has been based on feasible and realisable development capacity and not just plan enabled capacity.

- Ardmore 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/rigour is needed in relation to the analysis that has informed the location and sufficiency of business land.
- Ardmore considers that more detailed spatial analysis is required that builds on the work undertaken for the strategic growth scenarios to ensure this is sufficiently robust and meets the requirements of the NPSUD.
- Ardmore is concerned that there has been limited engagement with the development sector to develop the FDS. Furthermore, adopting the FDS by September 2023 provides limited ability to make meaningful changes in response to feedback received.
- In respect of Ardmore Airport, Ardmore requests that Ardmore Airport is identified as a business area on the Business Map (Figure 16) as it forms part of the industrial development happening in the south.
- Ardmore requests that the draft FDS is updated to clarify the timing for the Ardmore water treatment plant upgrades which are shown as decade 3 but also within Year 1-10 on the plan.

The submission below elaborates on these matters.

Demand and Capacity Analysis

Ardmore note that despite 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 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 basis used to inform this assessment, and it is not clear how the FDS meets the requirements set out in Section 3.2 and 3.3 in relation to feasible and realisable capacity and the appropriate competitive margin.

The evidence basis for determining demand needs to be robust and this is not currently the case. Section 3.3 of the FDS identifies that additional 520,800 people and 200,000 households over 30 years is required based on Stats NZ medium growth projections however, this is inconsistent with the HBA which identifies 384,000 households over 30 years. Furthermore, the FDS should in Ardmore's view, include a stress test against a high growth scenario to be sufficiently robust and to cater for uncertainty in Govt immigration settings.

The FDS concludes that there is plan enabled capacity of 2,345,500 dwellings and this is several times greater than expected demand. In Ardmore's view the amount of development capacity is overstated with no consideration of the economic feasibility of development or no factoring of a competitiveness margin. Instead broad assumptions are made that much of the plan enabled capacity will be commercially feasible based on the existing take up under the Auckland Unitary Plan is no assessment to support this assumption. The lack of evidence and reliance on broad assumptions is a reflection of the lack of involvement of the development sector in the capacity assessment. The Council has confirmed that the infrastructure ready development capacity figures until late-July 2023. This does not provide the opportunity to analyse this information and understand how it has been applied in the draft FDS.

In relation to business demand and capacity the FDS is based on initial results from the Council's Business Capacity Assessment which is still in draft form. The 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 we understand 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 FDS. The Council has confirmed that the updated Business Demand and Capacity Assessment will not be available until August 2023, after the close of submissions. This does not provide the opportunity to analyse this information and understand how it has been applied in the draft FDS.

Given that one of the key purposes of an FDS is to promote long term strategic planning which sets out how a local authority intends to provide at least sufficient development capacity over the next 30 years to meet expected demand, Ardmore submit that much more transparency/rigour is needed around the capacity analysis.

Growth Scenarios for Development

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." Kiwi note 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 Ardmore's view this analysis needs to be developed further with more detailed spatial analysis that evaluates the 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, particularly in south Auckland, which will in turn inform locations for supporting and proximate residential growth. We comment on this further below in relation to Ardmore.

Process Issues

Ardmore is highly concerned that there has been limited engagement with the development sector to develop the FDS. Engagement with the development sector is fundamental in obtaining empirical real-world evidence on feasibility that can sit alongside more theoretical development capacity and feasibility analysis. Input from the development sector would assist the Council.

The process for public engagement and decision making on the draft FDS only provides limited opportunity for public input when compared to the process followed by other cities. For instance, in Christchurch there has been significantly more opportunities for public input with a more robust and fair process for considering submissions. In particular:

- The public was asked to complete an online survey on how they thought the Greater Christchurch partnership should tackle important issues such as building greater resilience to a changing environment, meeting our emissions reduction targets, preserving and enhancing our cultural and natural environments, creating liveable and healthy urban areas, and supporting the delivery of housing to improve affordability. More than 7,000 people responded to the survey and this informed the development of the draft Greater Christchurch Spatial Plan;
- Public submissions on the draft Spatial Plan will be considered by an independent hearings panel to ensure a more open, transparent and fair process; and

- 4-6 months have been set aside from the close of submissions to adoption of a final plan to enable meaningful consideration of public submissions. In Auckland only two months has been set aside.

The NPSUD requires that the FDS is completed in time to inform the 2024 Long Term Plan. This does place a constraint on the Council for completing the draft FDS, however, given the concerns expressed above, there are a range of options that the Council could implement that would provide sufficient time to complete a legally compliant and robust FDS for Auckland that meets the Council's other obligations. These options include:

- Progressing the 2024 Long Term Plan on the basis of the current Auckland Development Strategy and 2017 Future Urban Land Supply Strategy; and
- Once the FDS is adopted, progressing any updates to the Long Term Plan via the Annual Plan process for minor changes, or via a Long Term Plan amendment if the changes are more significant; or
- Requesting that the Government grant an extension to the Long Term Plan timeframes for adoption, which has been done previously in other New Zealand cities.

Ardmore Airport Business Area

The FDS includes a map of business areas (Figure 16 of the draft). This map does not include Ardmore Airport which is currently zoned Special Purpose under the Auckland Unitary Plan and provides for industrial activities.

Ardmore is currently underway with a large scale development of the land formerly occupied by the second runway. When complete the development will accommodate an industrial precinct with a mix of aviation and non-aviation activities of about 50 hectares across five stages. Refer to Figure 2 for a plan showing the extent of the masterplan area. This is broadly consistent with what is allowed in the Ardmore Precinct under the Auckland Unitary Plan and reflects that the land around Ardmore Airport is well suited to industrial development given it is strategically located with excellent connections to the strategic freight network, the other industrial areas in south Auckland, as well as the Auckland Airport.

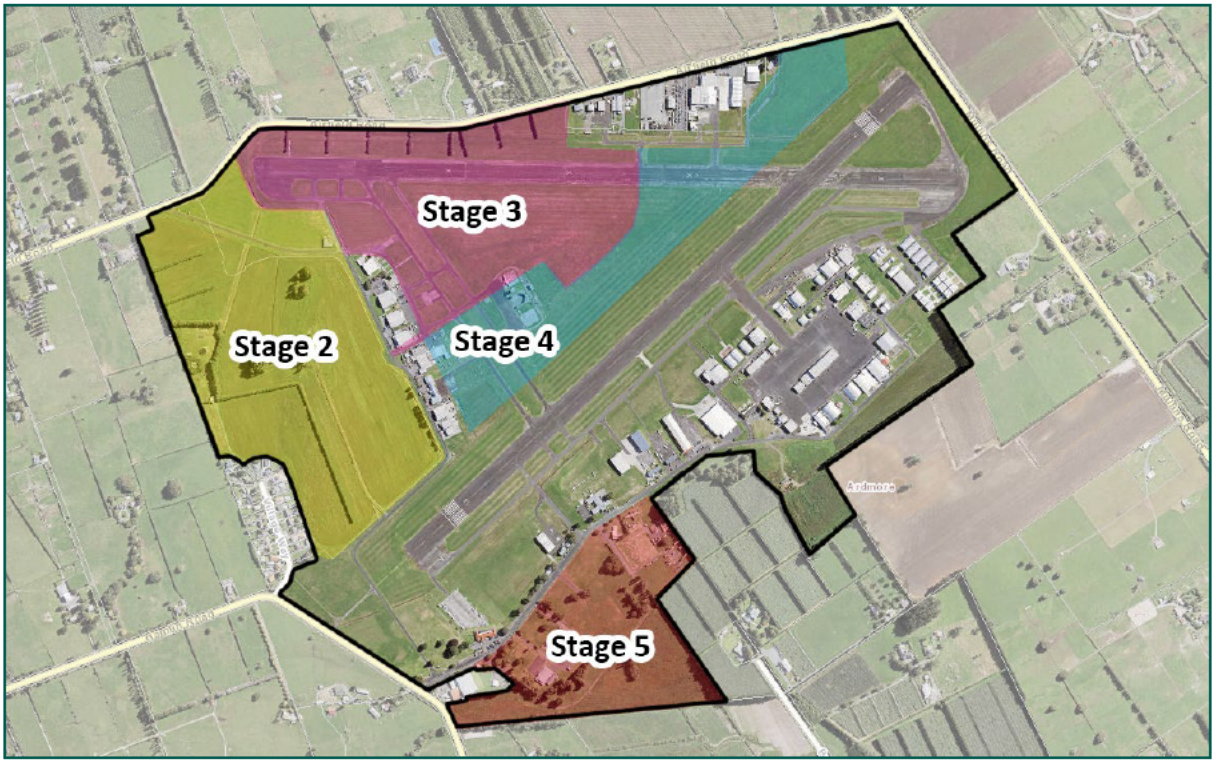


Figure 2: Indicative master plan for future development at Ardmore Airport.

In addition, it is noted that the Ardmore Airport is recognised as a piece of key infrastructure within Auckland and that there is a need for further industrial development to support the existing aviation activities which are extensive and growing.

Ardmore has a current resource consent to enable a 15ha non-aviation development at 99 Corsair Lane (Lot 2 DP578804), which is intended to be developed for industrial activities. Ardmore are underway with the next stage of consenting. In particular, the following resource consents were obtained:

Application number	Date granted	Overview
LUC60369623	24 June 2021	Bulk earthworks consent to facilitate the Stage 2 development and excavate stormwater management basins.
DIS60378995	24 June 2021	Discharge permit to enable the removal and remediation of contaminated soil.
LUC60382398	24 February 2022	Land use consent to enable the relocation of a vehicle crossing along Airfield Road to serve the Stage 2 development.
SUB60387768	20 July 2022	Subdivision consent to able the Stage 2 development area to be held on a separate Record of Title.

On this basis, Ardmore request that the Business Area Map is updated as set out in Figure 3 below to include Ardmore Airport as a business area. This reflects that this area is transforming to a significant industrial area which forms part of the industrial development area in the south. It will contribute significant industrial capacity towards meeting industrial demand. It is unclear if the Business Capacity Assessment has accounted for this.

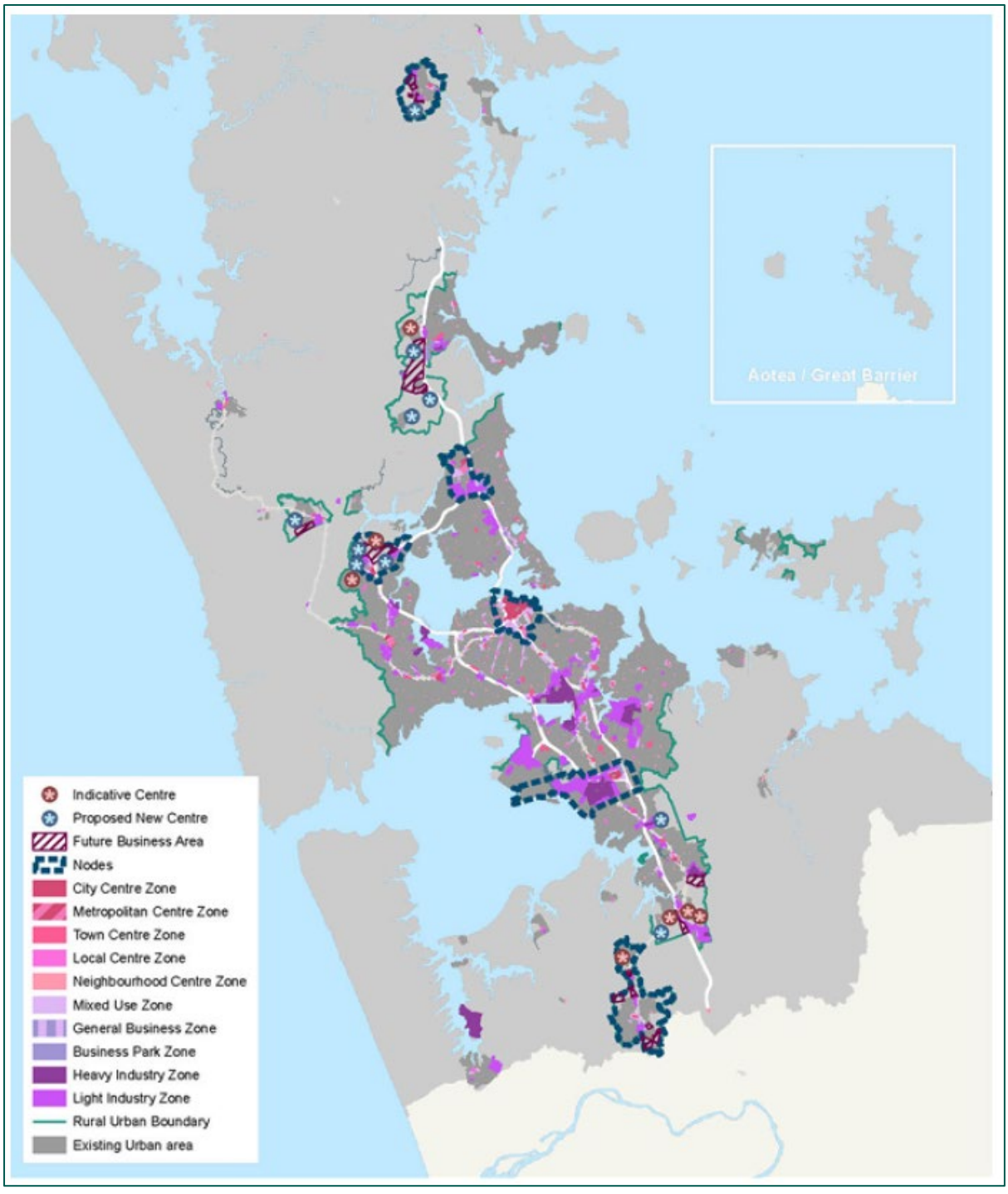


Figure 3: Ardmore proposed update to Business Map

Ardmore Airport Surrounding Development

Ardmore Airport is significant infrastructure and forms an important part of the aviation industry in Auckland. Activities within the Airport generate high levels of noise, particularly associated with the take off and landing of aircraft. To ensure that the Airport can continue to operate efficiently in this location, it is important that activities sensitive to noise are not located in close proximity to the Airport in the future, and at the least, are located outside of noise contours identified within the AUP shown in **Figure 4** below. We note that no residential development is identified within the noise contours or close to them and Ardmore Airport supports this outcome.

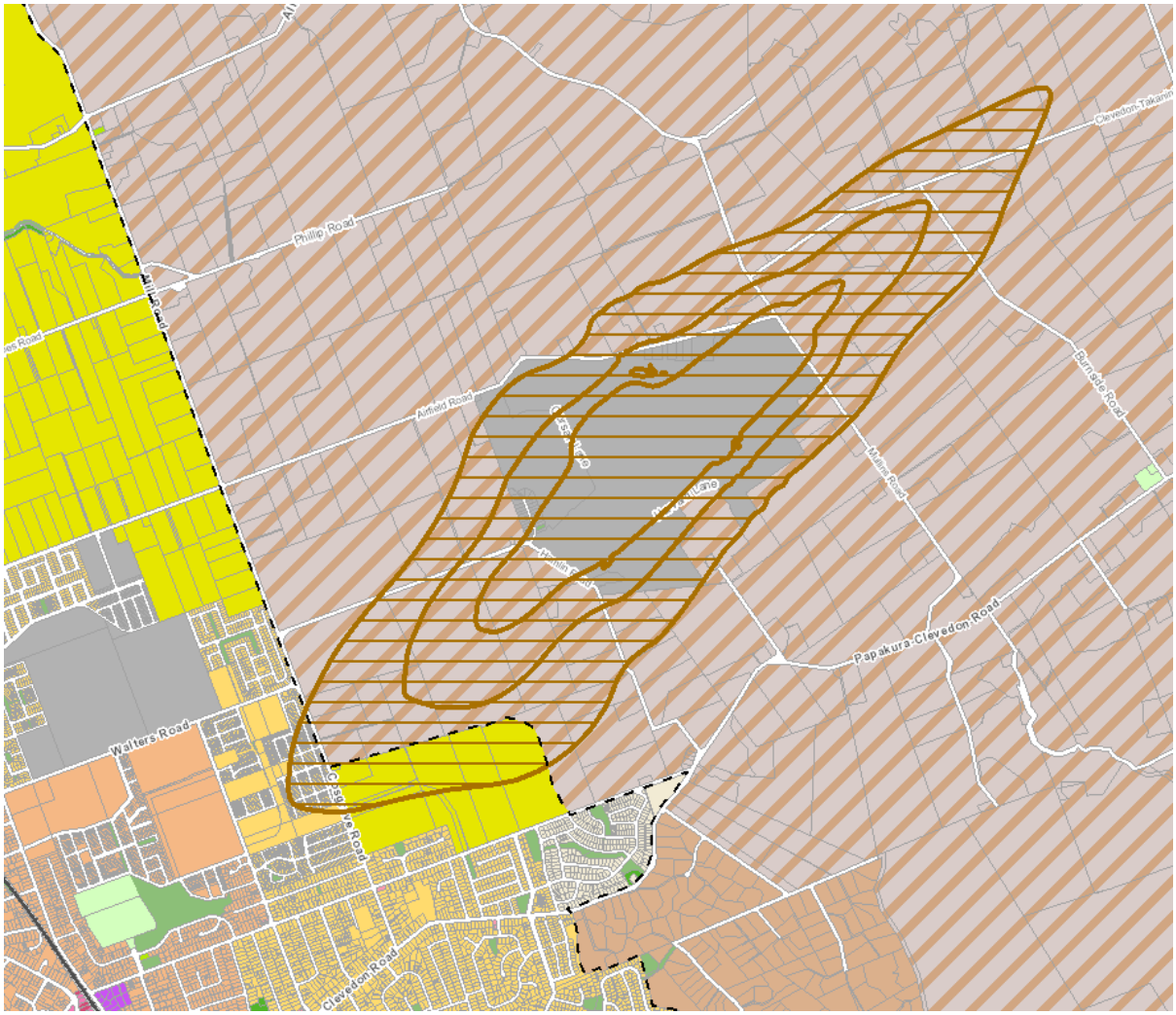


Figure 4: Showing the Aircraft Noise Overlay surrounding Ardmore Airport.

Ardmore Water Treatment Plant Upgrades

Appendix 3 of the draft FDS identifies timing of infrastructure to support development capacity. Appendix 3 identifies the timing for the Ardmore water treatment plant upgrades as decade 3. This upgrade however, has also been included on the 1-10 year plan within Appendix 3. We understand from the Council that this

notation is not correct, with improvements to individual process units and systems planned in the medium term, and capacity upgrades in the longer term.

Ardmore seeks that the timing and scope of these upgrades is clarified in the final FDS.

Reasons for Relief Sought

The amendments sought are to ensure that the FDS achieves a well-functioning urban environment and provides for sufficient development capacity are:

a) Specify how the FDS achieves sufficient development capacity as set out in Section 3.2 and 3.3 of the NPSUD;

b) Provide further analysis of feasible and realisable development capacity on a sub-regional basis to inform the adopted growth scenario;

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

d) Delay the adoption of the FDS to enable meaningful engagement with the community and development sector;

e) Identify Ardmore Airport as a business area on the Business Map (Figure 16); and

f) Clarify the timing of the Ardmore water treatment plant upgrades.

Decision Sought and Hearing

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

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

[redacted]

Date: 31 July 2023

(Person authorised to sign on behalf of submitter)

Address for Service

Ardmore Airport
C/ - Barker and Associates Ltd

PO Box 1986,
Shortland Street, Auckland 1140
[redacted]

[redacted]

Future Development Plan 2023 #8581

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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
Please see attached submission

Accessible local centres

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

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

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

Other

Tell us why

Please see attached submission

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

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

Other

Tell us why

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

#8581

Future Development Strategy

Focusing Growth: Agree

Auckland Council has, for the most part, got the planning & zoning correct so far. There needs to be areas where business/commerical, etc. can be set up locally to permit people to work locally.

However, there also needs to be proection for existing areas in Auckland City where there are architectural bungalows concentrated. These areas need to have sunlight, transport, etc. Bungalows in Auckland are the most valued example of this type of architecture in the world. People travel to Auckland to seek out these areas for architectual study.
High-rise, even a three to four level building is not appropriate in these architectual areas.

The Future Urban Areas (FUA) proposed for the northern area of Auckland are all that is required. The exception to this is, if those FUA's are located on a potential hazard area. Then further study is required, or that particular area needs to be withdrawn from the proposed zoned area.

The same FUA proposed for the south is all that is necessary. There is suffcient FUA zoned land for urban development in the south.

There needs to be a "greenbelt" around the entirety of Auckland City in order to provide an offset for the urban area. This greenbelt needs to include all the land from Wellsford to the FUA areas as propsed. This land is capable of producing excellent horticulture (grapes, blueberries, etc.) and is used extensively for agriculture – dairying & beef. All food producing land.

Again in the south of the city, the area from State Highway 22 to the West Coast should be protected for agriculture, and from State Highway 22 to the North, i.e. to the Manukau Harbour, needs to be protected.

Accessible Local Centres: Agree

This proposal encourages local work, school & leisure and will build communities. Strongly support this aspect.

2.
Avoiding Hazards: Agree

Whilst the land itself can support houses, etc. the land may be located in a future hazardous area. Past inspections have focused solely on the quality of the land, e.g. housing at Piha, but the actual location may be subject to future environmental hazards. These areas should be avoided at all costs. By building, or permitting growth on these ares it will lead to further issues with housing, etc. as has been witnessed recently. There needs to be areas where stormwater run-off can be contained, and/or dispersed without detrimental damage. Built-up areas have significantly more non-permeable surfaces which will require off-set. This off-set needs to be included in future planning.

Resilient Infrastructure: Disagree

As there is no translation of "mauri-enhancing" no agreement with that aspect can be lodged.
Information of this importance should be communicated on one language in entirety. Auckland Council has done this successfully for other cultures, e.g. Chinese, etc. but not in English. This is not a satisfactory way to communicate with people.
There is a need for areas to be set aside for rainfall offset to enable dispersal in a safe manner, particularly in and/or near infrastructure.

Other Feedback:

Auckland Council has not taken into account the National Policy Statement (NPS) on retaining areas with good quality soil for future agricultural and horticultural production. This needs to be addressed before any further zoning/development by private plan change or any other means, takes place. The Pukekohe/Karaka area produces 48% (Vegetable Growers Association study) of all the vegetables for the whole of New Zealand, plus exports considerable produce, which adds to the nation's GDP. It would be seriously detrimental to the future of this country, as well as future generations, if this land is not retained for food production. The location of this substantial area is in close proximity to existing, functioning infrastructure, e.g. the port of Auckland and the International Airport, both vital to the ongoing export trade.

There is nothing relating to this aspect (the NPS) in any of the planning so far. This is a serious lack. The area surrounded by the Manukau Harbour, through to State Highway 22 and the West Coast needs to be fully protected from any further urban expansion.
There is already provision/zoning for some future development in semi-village areas, e.g. Patumahoe, Waiuku, Kingseat, etc. This is sufficient.

3.

Whilst the NPS does not, at the moment, include water supply, there is unallocated water available to the Karaka/ Waiuku/Glenbrook areas. This adds considerable value to this area for future agricultural/horticultural production.

As stated previously, Auckland City needs a complete greenbelt around the major urban area in order to off-set the intensification of proposed high-rise living, etc.

The area from the northern boundary of Auckland City, right through and including all land therein, needs to be protected as a "greenbelt". Particularly the area around Pakiri, which needs to be retained as a natural undeveloped beach area in much the same way as "New Chums Beach". The land around Matakana, Tomarata, Wellsford & Warkworth is fully capable of producing excellent vineyards, horticulture, dairying & beef. This area should also provide an established greenbelt with no further development or subdivision.

There is sufficient proposed zoning for FUA in the northern area already.

Agricultural land needs protection now. Any further encroachment will lead to a future loss of production and severly impact future generations. Future water storage will mean that agricultural land will be even more desired than now.

Future Development Plan 2023 #8582

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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?

#8582

Campaign For Better Transport

31 July 2023

Auckland Council
AUCKLAND

Sent via e-mail: futuredevelopmentstrategy@aucklandcouncil.govt.nz

Dear Sir/Madam

FUTURE DEVELOPMENT STRATEGY

The Campaign for Better Transport Incorporated (**CBT**) welcomes the opportunity to comment on the draft Future Development Strategy. As a group focussed on lobbying for the transport needs of New Zealanders, our comments will primarily focus on the transport related elements of the plan.

Progress to Date

The CBT notes that the 1999 Auckland Regional Growth Strategy proposed a number of public transport corridors, some of which have had little to no progress in the years since. Key examples where no work has commenced are the Upper Harbour corridor and Avondale to Southdown, while Dominion Road and Manukau to Botany are still at a very preliminary stage and we do not envisage much progress being made on either corridor in the near future.

Setting aside this issue, a significant concern of ours has also been the general failure to preserve corridors which has resulted in a ballooning of costs as land values have skyrocketed. While not public transport specifically, an example of this has been the Mill Road corridor which was indefinitely shelved because of rising land costs. We fear the same could occur to public transport projects in the future if planned corridors are not saved. Even setting this fear aside, the delays effectively mean that any land value gains are baked in long before any physical work takes place.

We urge the Council to ensure that any corridors that are planned as part of the Future Development Strategy are preserved within a timely manner to ensure that they can be developed in a cost-effective manner.

Trains to Huapai

The CBT notes the Council's proposal to reduce the future urban zone area around the Huapai and Kumeu areas. While some of this has been brought about due to increased flooding risk, we consider the remainder to be dubious. We quote from the Final Consultation Document:

"Potential for higher VKT and CO2 emissions than other FUAs due to Kumeū-Huapai-Riverhead FUA being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs."

The CBT considers the transport related negative outcomes are easily avoided in the short, medium, and long term. In the short term, a train service could be extended to Huapai using the existing DMU rolling stock owned by Auckland Transport and which has been laid up for the last year. Such a service could start within a year or two and could at the very least provide a short-term solution. In

the longer term, the CBT is in favour of having a Northwest rapid transit corridor following the route of the Northwestern Motorway all the way through to Kumeu and Huapai and notes that such a longer-term solution could complement use of the heavy rail corridor.

Light Rail for the Isthmus

Auckland Council agreed to the Transport Emissions Pathway in last year, which has an extremely ambitious goal of 550 million public transport patrons by the end of the decade.

Reaching such levels of patronage will almost certainly revive concerns around bus congestion in the Auckland Central Business District which had been allayed by the bus network changes of 2016 through 2018 and the introduction of double decker buses. Even if the government's light rail proposals come to fruition in their current form, it is likely that more drastic action will be required to ensure Auckland core's public transport services do not encounter gridlock.

Given the potential impact on land use planning, the CBT considers that the 2015 light rail proposal of several isthmus surface light rail corridors should be revived, and we would be in favour of any reasonable upzoning which might be a consequence of such a move.

The following corridors should be considered, in order of importance:

- Mount Eden Road
- Great North Road
- Manukau Road
- Inner Link route
- Remuera Road
- Great South Road and Ellerslie-Panmure Highway
- Sandringham Road
- Tamaki Link route

For completeness, Dominion Road is only excluded from this list due to the current light rail proposals of the government. Should government policy in this regard change, then the CBT would consider Dominion Road to be top priority given its geographical location, the current land zoning and the level of public transport demand along that corridor.

The CBT's view on this issue is that it does not necessarily replace the government's light rail proposals and could complement these proposals should the government wish to proceed on its current course.

In saying this, we are not in favour of the government's current light rail proposals and remain in favour of a surface light rail option for Dominion Road and a heavy rail option for Onehunga to Auckland Airport to Puhinui, as this would be more economic, allow additional resources to be available to solve other transport problems and would more effectively achieve other objectives.

Considerations Beyond Auckland and Future Proofing

Given that Auckland is one part of the "Golden Triangle" transport corridor, the CBT hopes that Auckland Council considers the needs of those outside Auckland where they might have an impact on transport within Auckland.

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A key component of this is the need for track amplification, that is the construction of third and fourth mains as needed, to ensure that freight and longer distance passenger trains can always co-exist in the Auckland network along with Auckland suburban trains. Auckland needs to prevent going down the Sydney path of needing a freight train curfew due to a lack of railway infrastructure, which could cause havoc with logistics throughout New Zealand.

There are some other corridors where the needs of non-Aucklanders should be considered – an example of this is the Puhinui to Auckland Airport corridor, given the use of Auckland International Airport by not only people from Auckland, but indeed from the Waikato.

The CBT also emphasises that there needs to be adequate future proofing for as part of the Future Development Strategy. Beyond our comments about saving brand new corridors, the CBT also considers that large buildings should not be built immediately abutting the railway corridor, but that some space should be left to ensure future expansion of those corridors as needed. Examples of where large buildings have been built immediately abutting the railway corridor have been in Newmarket and Glen Eden with sub-optimal results. The former meant that Newmarket station has become cramped and cannot be expanded further to allow for use by longer distance trains such as Te Huia. The latter has meant that grade separation of an immediately adjacent level crossing is likely to be extremely difficult.

If the Council have any further queries, please contact us at committee@bettertransport.org.nz. We will be pleased to comment further if requested.

Yours faithfully
The Campaign for Better Transport Incorporated



Jodi Johnston (Mr.)
Convenor

Future Development Strategy

Campaign For Better Transport

Overall view

- The Future Development Strategy is predictable

- Public transport proposals are consistent with historic plans going back several decades

Slow Progress on Public Transport

- Several corridors identified in 1999 are as yet undeveloped
    - Upper Harbour
    - Manukau to Botany
    - Dominion Road
    - Avondale to Southdown

- General failure to preserve corridors – this has resulted in ballooning costs as land values skyrocket

Trains to Huapai

- From page 93 of the Final Consultation Document

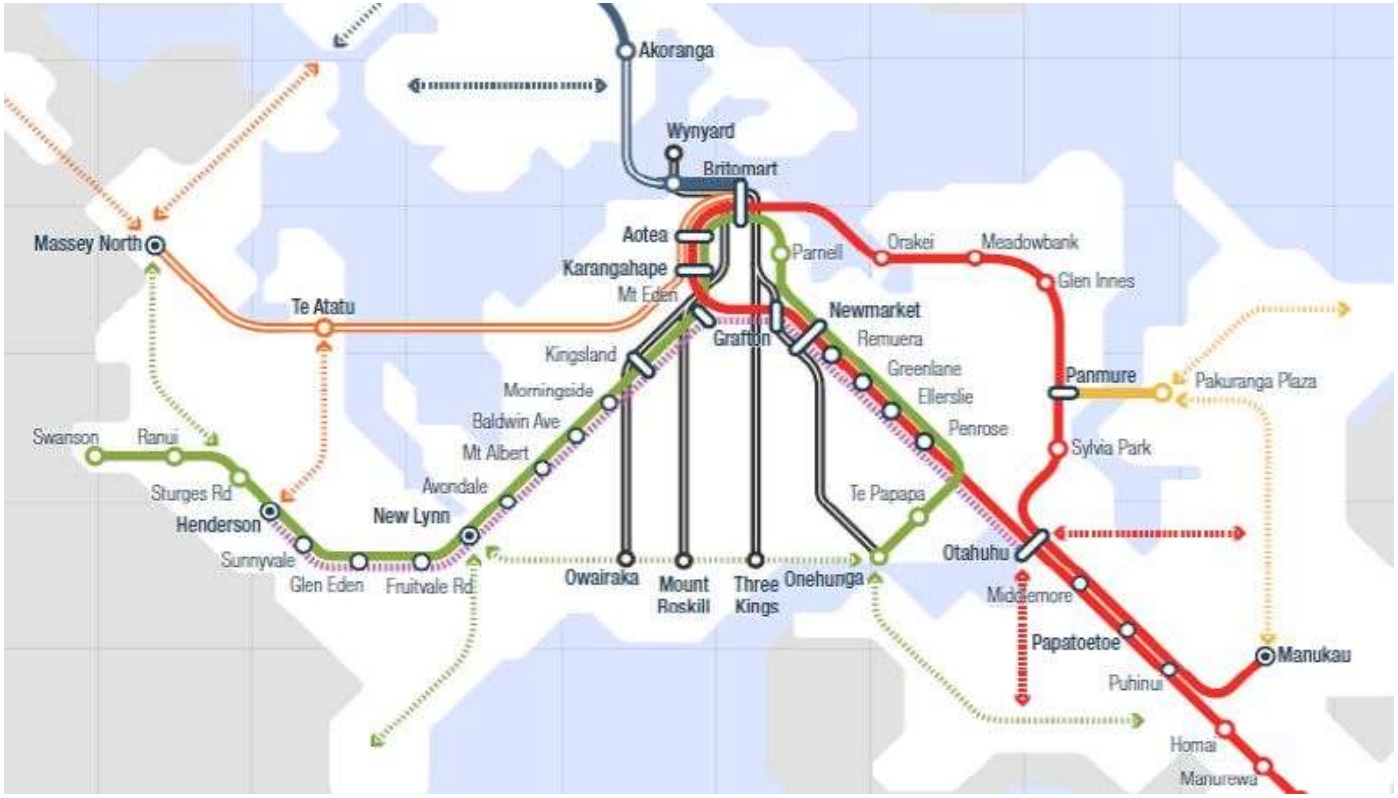
  "Potential for higher VKT and CO2 emissions than other FUAs due to Kumeū-Huapai-Riverhead FUA being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs."

- Trains to Huapai solves this problem by providing high quality public transport to the Kumeu-Huapai-Riverhead area

Light Rail for the Isthmus

- Transport Emissions Reduction Pathway – goal of 550 million public transport patrons
- Reaching such patronage levels will revive CBD public transport capacity concerns
- Double decker buses have delayed those problems – but have come at a speed cost
- 2015 light rail proposal needs to be revived

Light Rail for the Isthmus



Considerations Beyond Auckland

- The Golden Triangle is a key transport hub in New Zealand
- The Future Development Strategy needs to remember the flow on impacts to Auckland of the transport needs of the rest of the Golden Triangle
- This is particularly important for current rail corridors, but also is important for other corridors – e.g. Puhinui to Auckland Airport

Future Proofing

- Space needs to be set aside along existing rail corridors to allow for future track amplification
- Auckland has a history of building right up against the rail corridor with sub-optimal results – Newmarket is a good example of this
- Failure to do this could make future public transport projects extremely expensive

Get on and do it

- Best time to build infrastructure was yesterday
- Second best time to build infrastructure is today

Campaign For Better Transport

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