Future Development Strategy

Organisations

WRITTEN FEEDBACK
Volume 15

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Future Development Plan 2023 #8621

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please refer the attachment

#8621

CIVILPLAN CONSULTANTS

Submission on the Draft Future Development Strategy 2023

To: Auckland Council

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This is a submission on Draft Future Development Strategy 2023 ("the proposal" or "draft FDS").

The submitter, Next Generation Properties Limited ('NGPL'), is the owner of land at [redacted]. They are directly affected by the draft FDS's decisions related to the Pukekohe East future urban area.

1. General Submission

NGPL has a number of general concerns with the draft FDS. This includes:

a) The flawed method by which the draft FDS determines that sufficient development capacity will be enabled and the lack of detail provided as to how this will occur, including whether the requirements under the NPS-UD have been appropriately considered.

b) The overemphasis of 'plan-enabled' development capacity and its interchangeable use with development capacity in general, with limited or no consideration given as to whether that development capacity will also be infrastructure-ready, commercially feasible and reasonably expected to be realised.

c) The apparent lack of consideration given to ensuring that sufficient development capacity is provided in future urban areas to meet demand for housing in new urban areas.

d) The antagonistic view of the FDS towards private plan changes, despite these being solely responsible for delivering that part of the Future Urban Land Supply Strategy that has been implemented.

e) The recommendation for removal or further investigation of various future urban areas without providing sufficient evidence to demonstrate that these areas are not required to provide for sufficient development capacity and disregarding the evidence-based decisions from the Proposed Auckland Unitary Plan process regarding the suitability of the existing Future Urban Zones for future growth.

f) The bias in favour of infrastructure projects that are already funded, with no analysis provided to demonstrate that those infrastructure projects are more efficient at enabling sufficient development capacity than other infrastructure projects that have not been considered.

g) The inappropriate reliance on infrastructure funding decisions, often made by parties external to Auckland Council, to determine urban form outcomes, rather than infrastructure delivery being informed by urban form decisions.

h) The overemphasis on 'uncertainty' and the subsequent unwillingness to extrapolate known, existing data to predict future outcomes (that can then be reviewed as actual outcomes can be measured).

Further detail regarding these matters is outlined in the following sections.

1.1 Sufficient Development Capacity Assessment

The attached report has undertaken a review of whether the draft FDS has sufficiently met the requirements in clause 3.2 of the National Policy Statement for Urban Development 2020 ('NPS-UD') that require Auckland Council to demonstrate that at least sufficient development capacity for housing can be provided in the Auckland Region to meet expected demand. This report identifies a number of shortcomings that does not provide NGPL with confidence that Auckland Council has accurately addressed all of the relevant requirements under the NPS-UD.

For that reason, all conclusions and recommendations of the draft FDS that are reliant on Auckland Council's finding that there is sufficient development capacity within the existing urban area to meet short, medium and long term expected housing demand should be disregarded and not relied upon.

1.2 Sufficient Development Capacity in Demand in Future Urban Areas

Clause 3.2(1)(a) of the NPS-UD requires local authorities to provide at least sufficient development capacity to meet demand for housing in existing and new urban areas.

The draft FDS states that in recent years over 80% of growth has occurred within existing urban areas. Figures from Auckland Council's monthly housing updates specify that around 15% of growth is occurring within future urban areas (within the existing Rural Urban Boundary) and around 5% of growth is occurring within rural zones.

Based on these trends, NGPL would expect that the draft FDS would provide capacity for housing supply equivalent to at least 15% of demand within future urban areas, and that this capacity be commercially feasible and reasonably expected to be realised.

The FDS has not identified to what extent sufficient development capacity is being provided for within future urban areas in comparison to existing urban areas. While Appendix 4 to the draft FDS indicates that 12% of net development capacity is within greenfield areas, this is only 'plan-enabled' capacity and not development capacity that passes all of the tests specified under the NPS-UD (refer to the attached report for more details of these).

The FDS should specify how the identified future urban areas provide development capacity that is infrastructure-ready, commercially feasible and reasonably expected to be realised for approximately 5,000 dwellings in the short term, 12,000 dwellings in the medium term and 30,000 dwellings in the long term (being 15% of the estimated dwelling demand). While these figures may appear to be low and easily achievable, a detailed assessment is expected to find that:

a) In relation to short term capacity, there are few live zoned greenfield development sites that have all development infrastructure already in place that is sufficient to enable development of all of the otherwise available development capacity.

b) In relation to medium term capacity, all development infrastructure for live zoned greenfield development sites is often not funded within the next ten years under a Long Term Plan.

c) The extent to which development capacity is reasonably expected to be realised within the next 30 years will be significantly dependant on the size, shape and ownership of land within the future urban area. For example, large areas of land owned by a proven greenfield developer are significantly more likely to realise available development capacity than smaller or irregularly shaped countryside living lots under disparate ownership.

d) The rate at which development capacity is reasonably expected to be realised in future urban areas will be over a long period of time, reflecting the staged nature of greenfield development. Therefore, the short term 'reasonably expected to be realised' development capacity of a live-zoned and infrastructure-ready greenfield area will be much less than the total plan-enabled, infrastructure-ready development capacity available.

This would then demonstrate how the anticipated demand for housing within greenfield areas can realistically be provided for through future urban areas.

To clarify, NGPL does not seek any relief related to existing urban areas or the delivery of infrastructure to service feasible and reasonably expected to be realised plan-enabled capacity within existing urban areas. That approach will provide for intensification within existing urban areas to the extent that can be supported by market forces.

However, there would still be demand for housing typologies predominantly provided within new urban areas that would not be met by the development capacity provided within existing urban areas. To meet the requirements under clause 3.2 of the NPS-UD, the draft FDS needs to ensure that a wide range of development capacity is provided within the Auckland Region to meet the wide range of demands for housing, including for housing within new urban areas.

1.3 Role of Private Plan Changes

The draft FDS is critical regarding the role of private plan changes since the AUP was made operative with respect to enabling development within future urban areas. In particular, it states "*Rather than the sequenced approach provided for through the FULSS, live zoning has come through private plan changes ahead of time*."

HGL disagrees with the inference in this statement that private plan changes have caused the sequencing provided through the Future Urban Land Supply Strategy 2017 ('FULSS') to not be achieved.

The FULSS set out that between 2018 and 2022, several future urban areas – including Warkworth North, Whenuapai and Drury West – with a cumulative area of 2,060 ha would become development ready. Auckland Council failed to implement that plan. During this timeframe, only a single public plan change was notified – Plan Change 5, covering 360 ha of land at Whenuapai – but that was ultimately withdrawn. At the same time, a series of private plan change requests achieved live zoning of 347 ha (19% of the total cumulative area) prior to 2022. There remains a cumulative area of 1,509 ha of Future Urban Zoned land that has not been live zoned within the timeframe specified in the FULSS.

The FULSS then set out that between 2023 and 2027, additional future urban areas at Pukekohe and Takanini with a cumulative area of 1,144 ha would become development ready. A single private plan change request covering an area of 30 ha has been made operative in this area this year, within the FULSS timeframe.

It is accepted that a number of plan changes have been made for future urban areas set out in the FULSS as being development ready between 2028 and 2032, most notably several plan changes in Drury. A cumulative area of 347 ha has been live zoned approximately 5 years prior to the timeframe anticipated under the FULSS. However, it is important to note that:

a) Three of the six plan changes (PC52, PC 58 and PC72) were for discrete areas (all less than 10 ha and a very small proportion of the relevant future urban area) that directly adjoined the existing urban area, without the need for any significant infrastructure upgrades.

b) The area of 'out-of-sequence' live zoning (347 ha) is significantly smaller than the area of future urban zoning that Council failed to live zone within the FULSS 2018 to 2022 timeframe (1,509 ha).

c) In the case of the Drury plan changes, the live zoned area (339 ha) is still less than the Future Urban Zones in nearby Drury West Stage 1 and Paerata that were meant to have been live zoned between 2018 and 2022 (420 ha).

d) The bulk infrastructure necessary to enable development within all of the live zoned Drury future urban areas is not currently in place and will constrain the extent of development that can occur prior to 2028. However, it is considered highly unlikely that this infrastructure would have been in place between 2028 to 2032, as anticipated by the FULSS, without the private plan requests having been made.

Therefore, HGL seeks that the draft FDS be amended to reflect the role that private plan changes have had to play to implement the FULSS, noting Auckland Council has not made operative any public plan changes for any of the land planned to be development ready prior to 2022, thus private plan change requests are the only reason that there has been any implementation of the FULSS.

1.4 Implications For Future Urban Zoned Land

The draft FDS states the following in relation to future urban areas:

- "[the FDS] does not focus on identifying significant additional plan enabled development capacity" (page 30).
- "there will be less reliance on expansion into future urban areas and what growth there is will be phased over a longer timeframe" (pages 16 and 32)
- "future urban areas will provide for limited urban expansion" (page 39).

The draft FDS subsequently makes the recommendation that a significant proportion of future urban zones under the AUP should be removed, with these areas either specifically referred to or identified for 'future investigation'. This is seemingly on the basis that their removal would not affect the ability for Council to provide for sufficient development capacity.

As outlined above, NGPL considers that Auckland Council has not provided a sufficient evidence base to determine that there is sufficient development capacity in the short term, medium term and long term – including in relation to demand for housing in new urban areas – without the need for growth within all previously-identified future urban areas.

Therefore, NGPL seeks that the draft FDS does not recommend removal of any future urban zones, nor that any future urban zones be subject to further investigation as to whether the future urban zone should be removed. Instead, such areas should be retained as future urban zones given that, as was determined through the Proposed Auckland Unitary Plan process, they are suitable for future urban development when necessary to provide for sufficient development capacity – which, given the points raised above, may be much sooner than Auckland Council is estimating.

NGPL also strongly opposes the approach of the draft FDS to specify that some future urban areas will be "subject to further investigation", rather than undertaking that investigation prior to development of the FDS. This leads to significant uncertainty for affected landowners.

1.5 Offsetting Principle

Page 23 of the draft FDS sets out the following principle:

> "*The approach will be that, where plan-enabled capacity is reduced or constrained, over time forgone capacity will be offset by creating additional capacity in good locations elsewhere, so that overall capacity is broadly maintained.*"

The general sentiment of this principle is supported, although NGPL is concerned regarding how it is currently presented in the draft FDS. In particular:

a) It is unclear how this principle correlates with the position elsewhere in the draft FDS to remove or investigate removal of land currently zoned Future Urban under the AUP. Using the estimations under the FULSS, the removal of these future urban areas would reduce plan-enabled development capacity by approximately 50,000 dwellings (although this is likely greater in light of the MDRS). It is unclear where this development capacity is being offset to accord with this principle.

b) Providing for plan-enabled capacity in one area to offset reductions and constraints in another area does not directly ensure that sufficient development capacity remains provided for. As outlined in the report attached as Attachment 1, whether development capacity is plan-enabled is only one of many tests that must be passed in order for that development capacity to be sufficient. Plan-enabled development capacity that is also infrastructure ready and commercially feasible is not equivalent to plan-enabled development capacity that is not infrastructure ready or commercially feasible. Therefore, any offsetting of development capacity should give regard to these matters as well.

c) With reference to clause 3.2(1)(b) of the NPS-UD, any offsetting should have regard to whether equivalent building typologies are being provided for. For example, development capacity that met demand for detached dwellings should not be offset by development capacity that relies on intensification that delivers attached typologies/apartments.

d) The principle takes a vague approach as to when forgone capacity will be offset, stating this would occur "over time". It is considered necessary for offsetting to occur concurrently to reductions or constraints to capacity, as part of the same decisions. For example:

- A plan change that makes development capacity no longer plan-enabled should include, as part of the same request, an equivalent increase in plan-enabled development capacity that is also infrastructure-ready and commercially feasible in a similar location.
- A Long Term Plan that delays delivery of infrastructure intended to serve development capacity should also bring forward funding for infrastructure that would enable equivalent development capacity elsewhere.

On this basis, NGPL seeks that the draft FDS amend its offsetting principle as follows:

> *The approach will be that, where ~~plan-enabled~~ development capacity is reduced or constrained in a manner that results in it no longer being plan-enabled, infrastructure-ready or commercially feasible, ~~over time~~ the forgone capacity will be concurrently offset by creating ~~additional~~ at least equivalent capacity (including in terms of number, typology and general location) that is plan-enabled, infrastructure-ready or commercially feasible ~~in good locations~~ elsewhere, so that overall capacity is ~~broadly~~ maintained.*

1.6 Infrastructure Integration

The draft FDS states (on page 29) that "*It is important however that as much sufficient feasible development capacity as possible, where it is likely to be taken up, is infrastructure-ready*". Principle 3 (on pages 19 and 20) then outlines that Council will make efficient and equitable infrastructure investments.

Appendix 3 of the draft FDS is titled 'Infrastructure to support development capacity'. This includes a table that is specified to "*show the likely bulk/significant development infrastructure and additional infrastructure required to support or service the development capacity*". The following paragraph then states that "*The projects identified have been either committed and funded or signalled*", with a subsequent note that the tables "*are not exhaustive*". This indicates that there has been inadequate consideration given to the specific infrastructure projects that need to be delivered to enable sufficient development capacity, including whether any additional infrastructure projects are required to be funded.

When read as a whole, the draft FDS appears to take the approach that, as there is (allegedly) abundant development capacity across the Auckland region, uptake of this development will align with committed infrastructure projects, resulting in sufficient development capacity being easily achieved. This effectively results in decisions that have been made by infrastructure providers separate to Auckland Council (Auckland Transport and Watercare, for example) directing decisions on urban form. This is a far-from-ideal method of strategically planning for growth.

Instead, the draft FDS should identify the preferred locations for urban growth, identify what development infrastructure is necessary to make that development capacity infrastructure-ready and then use that analysis to determine funding priorities for development infrastructure. This may include bringing forward the timeframe for a project, identifying the need for funding for an additional project or delaying funding of a project that has limited benefits of enabling sufficient development capacity. This approach is consistent with clause 3.17 of the NPS-UD where local authorities are 'strongly encouraged' to use the FDS to inform long-term plans, infrastructure strategies and regional land transport plans. Decisions on urban form should not be beholden to decisions made by infrastructure providers.

Decisions on the extent of Future Urban Zones made during the Proposed Auckland Unitary Plan process is a good example of where decisions on urban growth and urban form were made in a holistic manner, rather than being dictated by infrastructure funding decisions. It is therefore disappointing to see that the draft FDS intends to relitigate the suitability of those areas for urban growth, partly on the basis of there being no commitment to delivering development infrastructure to those areas.

To address this matter, NGPL seeks that the draft FDS specifically identify the extent to which the 'committed' infrastructure projects support development capacity, by identifying the areas benefitted and the increase in sufficient development capacity that is directly enabled by the infrastructure (i.e. the extent of plan-enabled, feasible and reasonably expected to be realised development capacity that is only made infrastructure-ready as a result of the investment). These results should then be used as a method to prioritise development infrastructure, to then inform funding decisions.

1.7 Infrastructure Funding

The FDS appears to be taking the stance that the budget envelope for infrastructure is fixed and that, once committed projects are accounted for, there is minimal funding available to provide for any additional development infrastructure.

While setting a limited budget for development infrastructure may be politically advantageous, the NPS-UD requires an FDS to identify what development infrastructure is required to provide for sufficient development capacity and then the decision on how that is to be funded is to be determined. A FDS is not expected to only identify development infrastructure that fits within existing budgets.

Once a FDS has identified what development infrastructure is necessary to provide for sufficient development capacity, the long-term plan should then determine how that infrastructure will be funded. Auckland Council has multiple mechanisms available to it, including targeted rates, special levies (under the Infrastructure Funding and Financing Act 2020), development contributions and general taxation.

1.8 The Impact of Uncertainty

As it reads, the draft FDS has been prepared under a cloud of 'uncertainty'. The second paragraph of the executive summary and most paragraphs in section 1.1 refer to it being 'a time of uncertainty', setting this scene early in the document.

This theme of uncertainty and constant change is carried through the document, including the following statements:

- "There are ongoing changes to the workforce, economy, interest rates, inflation, and project viability. There is also ongoing behaviour change such as increases in working from home and online retail and a greater awareness of the environmental impacts our lifestyles have." (page 12)
- "There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years." (page 13)
- "The future is uncertain. There will be many changes in the global and local political, environmental, social, economic and cultural landscapes that will influence how we grow and will impact on the success of Tāmaki Makaurau." (page 25)
- "The feasibility of plan enabled development also changes over time, as preferences change, new amenities are created, and accessibility though transport investment improves." (pages 29 to 30)
- "Most growth is expected in sectors that prefer to locate in commercial areas. However, the exact nature of economic changes and related business land needs are uncertain." (page 46)
- "There is particular uncertainty around the timing and delivery of medium and long-term projects due to the constrained financial environment and current planning underway." (Appendix page 10)

It is accepted that change is inevitable and that this change is often uncertain. However, on review of the provisions of the NPS-UD that the draft FDS is prepared under, it is considered that a FDS need not concern itself with predicting the future but rather focus on the facts of what is currently known and reasonably expected. This could be extrapolated across the next 30 years, including to determine the expected demand for housing and business development capacity.

Instead, the FDS does not provide a clear calculation of sufficient development capacity, simply referring to "much of" the available development capacity being commercially feasible and stating that infrastructure-readiness will simply occur 'as is necessary'.

It is accepted that the FDS will not be perfect and will need to be amended to address on-going uncertainty – but this is what the review requirements under clause 3.16 of the NPS-UD are designed to address.

2. Site-Specific Submission

This submission specifically relates to the site located at 50 Pukekohe East Road, Pukekohe, which is henceforth referred to as 'the NGPL land'.

The NPGL land was identified in the Future Urban Land Supply ('FULSS') as part of the "Pukekohe" area, to be development ready between 2023 and 2027. Under the draft FDS, the NPGL land has been identified as part of the "Pukekohe East" area, which is not planned to support development prior to 2035+.

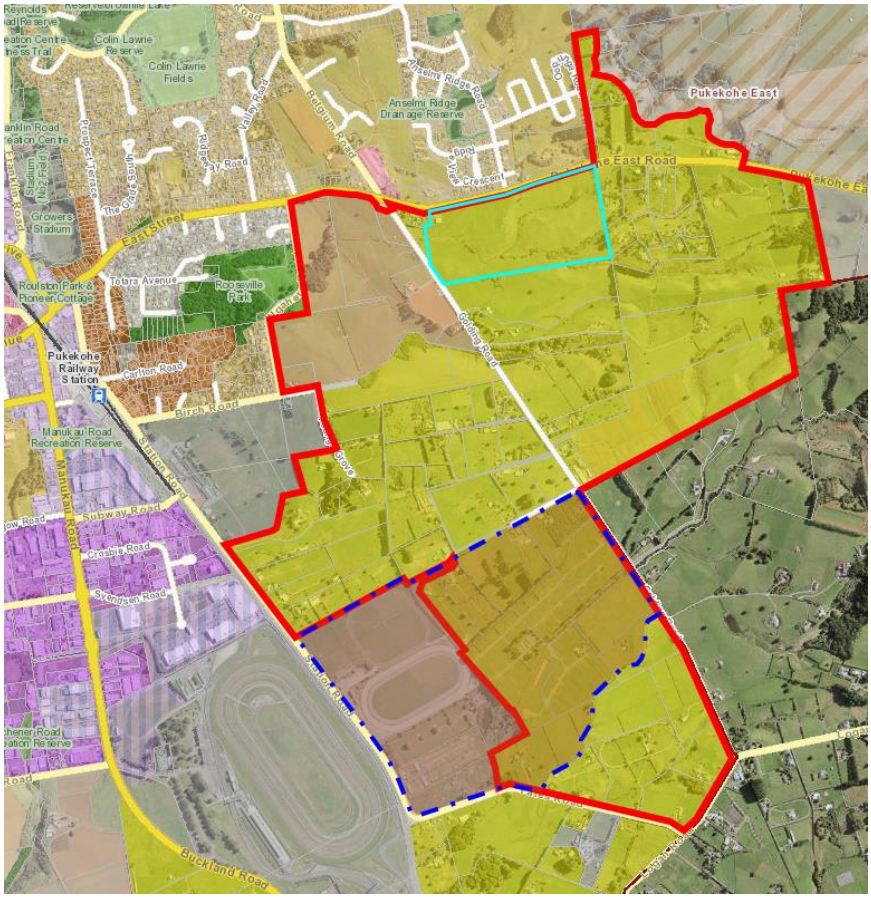


Figure 1: Location and Extent of the Pukekohe East Area (Outlined in Red) the NGPL Land (Outlined in Solid Light Blue) and Land Subject to Plan Change 74 (Brown and Outlined in Dashed Blue)

The Pukekohe East future urban area is shown on Figure 1, above. This area primarily consists of Future Urban zoned land, although part of this in the north-western corner has recently been lived zoned as a result of Plan Change 76 being made operative earlier this month, and decisions on Plan Change 74 made in March this year will soon see most of the southern part of the Pukekohe East future urban area live zoned as well. It is also noted that a private plan change request has been made for the live zoning of the NGPL land (although not by NGPL). These private plan changes are all consistent with the development timeframe for this area specified in the FULSS.

These private plan change requests demonstrate that it is commercially feasible to provide for housing within Pukekohe East and indicate that this is reasonably expected to be realised. However, both Plan Changes 74 and 76 included infrastructure triggers that mean that this development capacity will not be infrastructure-ready.

The draft FDS does not provide any details regarding the quantity of development capacity that is anticipated within the Pukekohe East future urban area and the extent to which infrastructure investment will allow for that development capacity to be realised.

The draft FDS (on Appendix Page 28) identifies Pukekohe Arterials, Mill Road (Bombay) Upgrade and Papakura to Pukekohe Rail Electrification as key infrastructure projects to support development at Pukekohe East. The latter of these is a Decade One project that is expected to be completed by 2025 (before any development at Pukekohe East is expected to be completed). The draft FDS does not identify a timeframe for the other listed projects. In addition, none of these infrastructure projects are directly identified as infrastructure triggers for development under Plan Changes 74 and 76.

Therefore, the draft FDS does not provide any clear rationale for delaying the timeframe for development of the Pukekohe East future urban area from 2023-2027 (as per the FULSS) to 2035+.

NPGL considers that a timeframe of 2025+ would be more appropriate given that:

- This aligns with expectations of development timeframes previously shared under the FULSS.
- Decisions Plan Changes 74 and 76 have already determined the appropriateness for land in this future urban area to be subject to a live zone now (in 2023).
- Decisions on Plan Changes 74 and 76 have identified that the arterial road transport projects identified on Appendix Page 28 of the draft FDS are not necessary in order to commence urban development.
- Although it is accepted that arterial road transport projects identified on Appendix Page 28 of the draft FDS may be necessary to support full development of the Pukekohe East future urban area, full development is likely to take at least a decade, meaning that the delivery of these projects does not need to align with live zoning of the land.

Regardless of whether the timeframe is brought forward or retained as 2035+, the draft FDS should identify all development infrastructure that is necessary to support realisation of the development capacity within the Pukekohe East future urban area. This should then be identified as short or medium term priorities, with funding to be provided as necessary through the 2024 Long Term Plan (with the funding mechanisms to achieve this determined when preparing that LTP).

3. Relief Sought

As outlined in the sections above, NGPL requests the following relief:

- That Auckland Council releases an updated FDS or Housing and Business Development Capacity Assessment that includes significantly greater detail as to how sufficient development capacity for housing can be provided, including an assessment of how the development capacity is reasonably expected to be realised and how the decisions in the draft FDS (such as to remove or significantly delay roll out of future urban areas) does not prevent sufficient development capacity from being achieved in the short term, medium term and long term.

- That Auckland Council undertakes a full assessment of all infrastructure needs for various development areas – both brownfield and greenfield – to meet demand for housing that is otherwise reasonably expected to be realised. Where the lack of infrastructure is the only obstacle to realising development capacity in that area, the FDS should identify the provision of that infrastructure as a priority.

- That the FDS does not recommend removal of any future urban areas, or investigations into doing so.

- That the FDS does not ignore the evidence-based decision making through the Proposed Auckland Unitary Plan process that determined existing Future Urban Zoned areas were appropriate for urban growth.

- That the FDS be amended to delete "*Private plan changes severely undermine coordination*" as a key consideration (on page 39) and alter the assessment, conclusions and recommendations subsequently made in the draft FDS as necessary, on the basis that private plan change requests are the only reason that there has been any implementation of the FULSS to date.

- That the offsetting principle in the draft FDS be amended as follows, with offsetting of development capacity required as part of plan changes and Long Term Plans that directly impact achievement of sufficient development capacity:

> *The approach will be that, where ~~plan-enabled~~ development capacity is reduced or constrained in a manner that results in it no longer being plan-enabled, infrastructure-ready or commercially feasible, ~~over time~~ the forgone capacity will be concurrently offset by creating ~~additional~~ at least equivalent capacity (including in terms of number, typology and general location) that is plan-enabled, infrastructure-ready or commercially feasible ~~in good locations~~ elsewhere, so that overall capacity is ~~broadly~~ maintained.*

- That the FDS specifically identifies the extent to which the 'committed' infrastructure projects support development capacity to inform prioritisation of these projects (including in relation other infrastructure projects not identified in the draft FDS). This will ensure that existing and planned infrastructure decisions do not determine the form and timing of urban growth in Auckland.

- That the identification of infrastructure projects that are necessary to enable sufficient development capacity in the FDS is not influenced by existing budgets, noting that there are a variety of alternative funding opportunities that are being underutilised by Council, including targeted rates and special levies under Infrastructure Funding and Financing Act 2020.

- That the FDS be prepared on the basis of extrapolating known, existing data rather than avoiding providing detail on the basis of expected uncertainty. The mandated review process allows for necessary amendments to be made where actual outcomes do not match those anticipated by the FDS.

- That the Pukekohe East future urban area be identified as short or medium term development capacity (2025+, to be consistent with the FULSS and Plan Change 74 and 76 decisions).

- That the draft FDS identifies Pukekohe Arterials and Mill Road (Bombay) Upgrade arterial road transport projects as priorities to support medium to long term development capacity in the Pukekohe East future urban area (and other future urban areas).

Signature: .....

[redacted] – Associate, CivilPlan Consultants Ltd
on behalf of Next Generation Properties Limited

Date: 31 July 2023

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CIVILPLAN CONSULTANTS

SUFFICIENT DEVELOPMENT CAPACITY IN AUCKLAND

Project Name:	Auckland FDS 2023 Submissions
Client:	Various Clients
CP Project No:	2418
CP Document No:	PR01v1
Date of Issue:	20 July 2023
Originator:	[redacted] – Senior Planner
Reviewer:	[redacted] – CivilPlan Associate

1. Introduction

This report provides a review of whether the Draft Future Development Strategy 2023 ('draft FDS') released by Auckland Council on 6 June 2023 has sufficiently met the requirements under the National Policy Statement for Urban Development 2020 ('NPS-UD') related to demonstrating that at least sufficient development capacity for housing can be provided in the Auckland Region.

2. Requirements for Providing Sufficient Development Capacity

Clause 3.13 of the NPS-UD specifies the purpose and content of an FDS. This includes:

- Under clause 3.13(1)(a)(ii), that an FDS must set out how a local authority intends to provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand.
- Under clause 3.13(2)(a), that every FDS must spatially identify 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.

These provisions clearly identify a link between the contents of an FDS and the requirements under clauses 3.2 and 3.3 of the NPS-UD. Those clauses relate to providing sufficient development capacity for housing and business land, respectively. The following assessment relates only to development capacity for housing, although there will be some correlation with the development capacity for business land requirements of the NPS-UD.

Clause 3.2 of the NPS-UD identifies a number of requirements to be met in order to demonstrate that sufficient development capacity for housing is being provided. This includes:

- That the following types of demand be considered:
  - Demand both within existing urban areas and for new urban areas (clause 3.2(1)(a)); and
  - Demand for both standalone dwellings and attached dwellings (clause 3.2(1)(b)).
- That sufficiency be demonstrated for the short term, medium term and long term (clause 3.2(1)(c)).
- The following tests to determine the development capacity of land:
  - That the capacity is plan-enabled (clause 3.2(2)(a)); and
  - That the capacity is infrastructure-ready (clause 3.2(2)(b)); and
  - That the capacity is feasible (part of clause 3.2(2)(c)); and
  - That the capacity is reasonably expected to be realised (part of clause 3.2(2)(c)).
- That a competitiveness margin be applied above expected demand (clause 3.2(2)(d).

The below assessment will be limited as to whether the capacity indicated by the draft FDS meets each of the tests listed under clause 3.2(2) of the NPS-UD in relation to each of the terms specified in clause 3.2(1)(c) of the NPS-UD.

While the draft FDS addresses a few of these matters, the level of detail in analysis provided, including with the supporting analysis reports and referenced documents, is considered to be lacking (as covered in the subsequent sections). In addition, the draft FDS is seemingly silent on a number of these matters.

3. Plan-enabled Capacity

Clause 3.4(1) of the NPS-UD identifies how development capacity for housing is plan-enabled in relation to the short term, medium term and long term. The term 'zoned' (used in that clause) is then defined in clause 3.4(2). For the short and medium term, this consists of permitted, controlled or restricted discretionary activities within an operative and proposed plan, respectively.

The majority of urban zones under the AUP provide no limit on the number of dwellings that can be provided as a permitted, controlled or restricted discretionary activity. In such zones, establishing any number of dwellings is a restricted discretionary activity and infringement to building standards (which would otherwise control density) is a restricted discretionary activity. Therefore, the plan-enabled development capacity for housing in the short term (and subsequently in the medium and long terms as well) is theoretically unlimited. It is however noted that in some locations, such as the Single House zone, plan-enabled development capacity remains limited by plan provisions.

In comparison, the draft FDS states that the estimated total plan-enabled dwelling capacity in Auckland is 2,345,500. A detailed methodology as to how this figure has been determined is not provided in the draft FDS or other material referenced by the draft FDS (including the PC78 section 32 reports). The draft FDS does not identify whether this figure relates to the short term, medium term or long term.

Therefore, the approach taken by the draft FDS to determine plan-enabled development capacity for housing is not considered to be consistent with the requirements of the NPS-UD.

4. Infrastructure-Ready Capacity

Clause 3.4(3) of the NPS-UD identifies how development capacity for housing is infrastructure-ready in relation to the short term, medium term and long term. The term 'development capacity' is defined in clause 1.4(1). In summary:

- Short term infrastructure-ready capacity is where there is adequate existing network infrastructure for water supply, wastewater disposal and stormwater management and sufficient existing land transport infrastructure to support the development of the land, without any further infrastructure works or upgrades being necessary.
- Medium term infrastructure-ready capacity also includes where the above-mentioned infrastructure necessary to enable development is funded in a long term plan.
- Long term infrastructure-ready capacity also includes where the above-mentioned infrastructure necessary to enable development is identified in an Infrastructure Strategy.

Given the definition of 'development capacity' under the NPS-UD, this single test of 'infrastructure-ready' actually consists of four separate assessments, each related to the four types of infrastructure (water supply, wastewater disposal, stormwater management and land transport).

The draft FDS uses the term 'infrastructure-ready' a total of two times, both within the same paragraph on page 29. These mentions specify that not all plan-enabled and feasible capacity needs to be infrastructure-ready, but that as much capacity as possible should be. While both of these are accurate statements, no further information is provided as to the estimated development capacity that is and will be infrastructure-ready, and the locations of these. Appendix 3 of the FDS lists various infrastructure projects planned within the next three decades, but it does not directly link any of these projects to quantified increases in development capacity as a result of their delivery.

Therefore, the approach taken by the draft FDS to determine infrastructure-ready development capacity for housing is not considered to be consistent with the requirements of the NPS-UD.

In order to determine infrastructure-ready development capacity, it would have been expected that the FDS identify the capacity of infrastructure networks (wastewater, water supply, stormwater and roading) on a catchment basis, in order to identify what additional capacity is available without any upgrades and as a result of planned upgrades.

The Housing Development Capacity Assessment ('HCA') prepared by Auckland Council in 2021 included an assessment of the water supply and wastewater networks across Auckland and identified that that, of the net-plan enabled capacity identified in that document, only 57% was serviced in the short term, 77% in the medium term and 99% in the long term. However, more specific data, including the geographical distribution of this, was not provided. That HDCA also stated that it did not consider land transport capacity at all. This is despite the capacity of the roading network and the availability (and reliability) of public transport and active transport infrastructure in Auckland often struggling to cater for existing development, let alone additional development capacity.

Taking the above into account, significantly more information and assessment should have been undertaken by Auckland Council in order to determine in infrastructure-ready development capacity for housing in the short term, medium and long term. This should have necessitated assessments of the capacity of each of the four infrastructure types and then overlap those layers to carry forward the lowest development capacity. This exercise would also be crucial to identify any significant 'gaps' in infrastructure servicing that could be resolved through reallocating funding in the Long Term Plan (i.e. allowing for an increase in medium term development capacity).

5. Feasible Capacity

'Feasible' is defined in clause 1.4(1) of the NPS-UD to mean commercially viable to a developer based on the current relationship between costs and revenue, with reasonable adjustments enabled for the long term. Clause 3.26 specifies that any reasonable method can be used to determine this, but that the method, inputs and assumptions used must be outlined and justified.

The draft FDS states, on page 29, "*much of this* [plan] *enabled capacity is or will be commercially feasible*", without providing any further quantification. However, the overall evidence report for the draft FDS specifies that these conclusions result from the 2021 Housing Capacity Assessment ('HCA') that was prepared in accordance with the requirements in Subpart 5 of the NPS-UD. That HCA identified the method, inputs and assumptions used, being a feasibility model.

The HCA identified that, on an Auckland-wide basis, 840,000 dwellings would be commercially feasible in the short term. This is only 36% of the 2,345,500 dwellings that the draft FDS specifies "*much of*" would be commercially feasible. There is also no clarity as to which geographic areas this feasible development capacity occurs within.

Therefore, the draft FDS is considered to not comply with the requirements of the NPS-UD on the basis that it:

- Does not directly quantify the extent to which development capacity is commercially feasible;
- Does not sufficiently justify its conclusion that "*much of*" the stated 2,345,500 dwelling plan enabled capacity is commercially feasible; and
- Does not specify in what areas of the region commercially feasible development capacity would be provided.

6. Capacity That is Reasonably Expected to be Realised

On review of the draft FDS, Auckland Council appears to have ignored the relevance of whether development capacity is "*reasonably expected to be realised*". That term does not appear in any part of the draft FDS, with the closest references being the sentence "*Ongoing take-up of these opportunities is reasonable expected wherever they are provided*" on page 30, without any justification.

It is assumed that Auckland Council has treated commercially feasible development capacity to be the same as development capacity that is reasonably expected to be realised. However, despite being part of the same clauses (e.g. clause 3.2(2)(c) and clause 3.22), these are presented by the NPS-UD as separate and very different tests. In this regard, it is noted that each of the example methods in clause 3.26(2) outline a two-step process as demonstrated below:

- Clause 3.26(2)(a): The method asks for the following to be estimated separately:
    - "*the number of feasible dwellings (using a feasibility model)*"; and
    - "*the number of dwellings that can reasonably be expected to be realised (using building consents data on the number of sites and extent of allowed capacity that has been previously developed)*".
- Clause 3.26(2)(b): The method specified the following steps:
    - "*estimate the number of feasible dwellings or sites*"; and then
    - "*assess the proportion of these that can reasonably be expected to be developed*"
- Clause 3.26(2)(c): The method refers to integrating information from past trends and future landowner/developer intensions into a feasibility model, inferring that the feasibility model would first be created first.

The feasibility model included in the HDCA prepared by Auckland Council in 2021 does not appear to have integrated information about past development trends and future landowner and developer intentions into the feasibility model.

Therefore, a second step needs to be taken in the draft FDS to estimate the extent to which development capacity is reasonably expected to be realised. This is considered to be a key aspect of determining whether sufficient development capacity is provided.

Without specifically considering the extent to which development capacity is reasonably expected to be realised, the draft FDS appears to be inferring that it is reasonably expected that almost or over two million additional dwellings would be constructed in Auckland within the next 30 years, requiring redevelopment of almost all sites and near-maximisation of development potential (relying predominantly on apartment typologies). This is considered to be highly fanciful.

Auckland Council could have undertaken a review of resource consent and building consent data in relation to each existing the AUP zones to demonstrate the extent of uptake of intensification and urban expansion across existing zones and in different localities, including the rate of uptake (to allow alignment with the short term, medium term and long term timeframes) and the extent to which the actual number of dwellings delivered compared to the maximum feasible development capacity. This would be consistent with the example methods in clause 3.26(2).

In addition, regard would need to be given to the extent to which:

- Existing developed properties are unlikely to be redeveloped due to owners' preferences or non-RMA legal restrictions, such as private covenants on property titles.
- The extent to which developers choose to provide a lower number of dwellings than the maximum capacity available – such as constructing two storey terraced houses are constructed in the THAB zone.
- The extent to which developable land is owned by known developers who have a proven record of realising development capacity when this is achievable.

On this last point, Auckland Council could have directly consulted with owners and developers of large-scale brownfield sites and live zoned greenfield sites to understand their development aspirations and timeframes, to have a solid estimate of what development capacity is reasonably expected to be realised in those areas across the short term, medium term and long term. Development of larger greenfield sites often occurs many years and potentially decades after the land is first live zoned and so it should not be assumed that all available development capacity will be realised in the short term.

It is recognised that the overall evidence report for the draft FDS identifies that a survey was sent to "*property developers on the council's database*". CivilPlan has asked a number of its property developer clients whether they received such a survey, including developers with significant land holdings in live zoned greenfield areas, and found none that were aware of such a survey being conducted by Council. In this regard, it is considered that Council has not satisfactorily undertaken consultation with the development sector prior to preparation of the FDS, as is required by clause 3.15(1)(f) of the NPS-UD.

The final FDS should therefore be updated to ensure that thorough consideration has been given as to whether development capacity is reasonably expected to be realised, including consideration of:

- The likely uptake of development capacity where this is plan-enabled, feasible and infrastructure-ready by giving regard to historic trends, including within the short term, medium term and long term – both in terms of whether any development of a site is likely to occur and the extent to which development maximises (or otherwise) available capacity.
- The planned rollout of development for large-scale brownfield and greenfield properties by established property developers.

6.1 Case Study – Pakuranga THAB

To illustrate a more appropriate approach to determining what would be "*reasonably expected to be realised*", development patterns in an area zoned Terrace Housing and Apartment Buildings near Pakuranga Town Centre have been considered further. This area has been chosen as it is known to exhibit a relatively high uptake of development opportunities in recent years, due to opportunities under the AUP and its close proximity to a variety of community, commercial and transport facilities. The sites included in this area are shown in Figure 1, below.

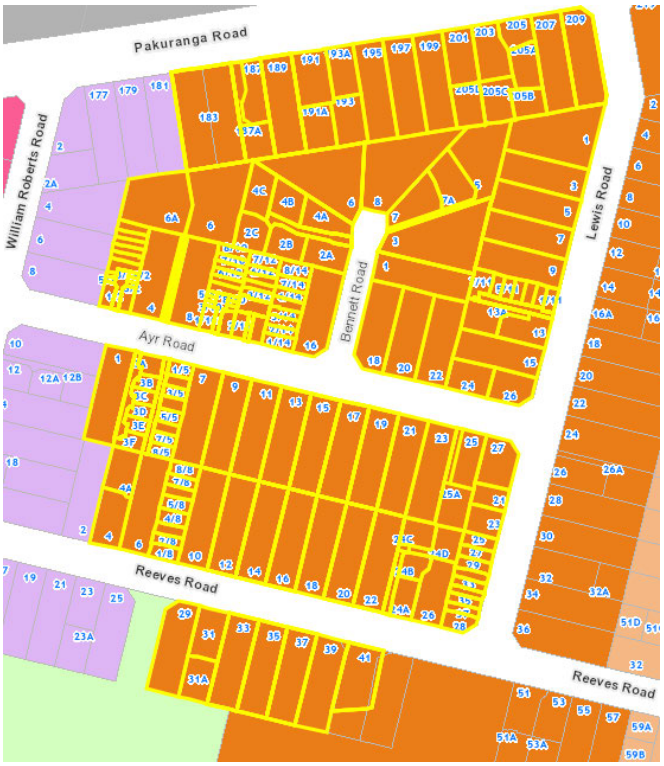


Figure 1: Pakuranga THAB Case Study Area

While this case study assessment relates only to a small area, it is expected that Auckland Council would have sufficient information in their database in order to undertake a similar assessment at scale, including considering different attributes such as across different zones and within brownfield and greenfield settings.

All sites within this case study area have been listed in Table 2, attached, and have been categorised as follows:

- Sites containing dwellings built prior to 2000 (using the Record of Title date as a proxy).
- Sites containing dwellings built between 2000 and 2020. It is assumed that none of these sites would be redeveloped in the next thirty years based on the assumptions of a 50-year timeframe for buildings (meaning it is unlikely that they would be demolished) and a general inability to provide for infill development (due to the historic building and lot patterns).
- Sites containing dwellings built between June 2020 and June 2023. In this case, there are a total of nine developments, each of which related to a single site and dwelling.

The maximum number of dwellings for each of these sites has been calculated using the following assumptions:

- A floor area per storey of 50% of the net site area.
- A building height of four storeys.
- A floor area per dwelling of 120 m^2.
- All results for each site rounded down.

It is considered that these assumptions are roughly similar to those used by Council to determine 'plan-enabled capacity'. For sites with Record of Titles between 2020 and 2023, maximum capacity has been determined in relation to the sites as they were in June 2020 sites (the sum of the resultant allotments and any access lot).

Using this method, it has determined that the above sites (as of 1 June 2020) had a theoretical maximum capacity of 1,158 dwellings. It has then also determined that at that date there were a total of 118 dwellings on those sites, resulting in a net capacity of 1,040.

However, the 30 sites which contain dwellings built between 2000 and 2020 contributed a gross capacity of 190 dwellings and a net capacity of 160 dwellings. Due to the age of the existing dwellings on these sites, it is considered to be unlikely that any of this capacity would be realised within the next 30 years. Reasonably available development capacity then drops to 880 dwellings.

Similarly, regard needs to be given to the extent to which development does not maximise available capacity. To determine this, Table 1, below, details the number of actual dwellings provided in comparison to the maximum capacity (as per the assumptions above) for each of the developments that have been completed between June 2020 and June 2023. This indicates that only 49.17% of net development capacity (59 of 120 dwellings) was realised, with the rest unrealised.

Table 1: Actual Development Compared to Maximum Capacity

Development	Number of Dwellings	Maximum Capacity	Unrealised Capacity
28 Reeves Road and 25-37 Lewis Road	8	15	7
3A to 3F Ayr Road	6	15	9
1-7/11 Lewis Road	7	13	6
1/8 to 8/8 Reeves Road	8	15	7
1-7/12 Ayr Road	7	14	7
1-8/10 Ayr Road	8	14	6
1-8/2 Ayr Road	8	14	6
1-8/5 Ayr Road	8	15	7
1-8/14 Ayr Road	8	14	6
Total	68	129	61

The assessment of those nine developments between June 2020 and 2023 has also indicated that within a three-year period (equivalent to the short term), only 6.7% of the reasonably available capacity has been realised (59 of 880).

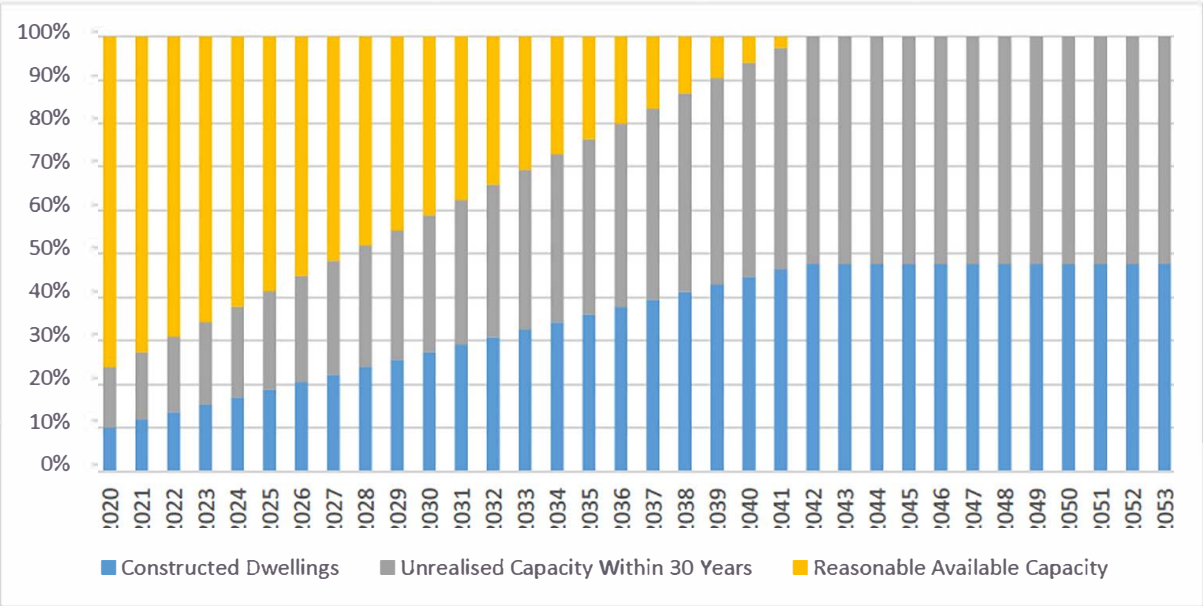
Assuming that a constant uptake of development capacity occurs in the future, a net increase of 20 dwellings per year within this case study area can be confirmed. However, a net increase in the number of dwellings would coincide with an increase in capacity that would be unrealised within the next 30 years, at the ratio of 59:61, matching the findings above. This would mean that for every net increase of 20 dwellings, there would be an increase in unrealised capacity of either 20 or 21 dwellings.

Table 3, attached, has extrapolated this data and shows that:

- Approximately half (52%) of gross development capacity would be unrealised within the next 30 years due to recent and future development not maximising the development capacity of each site.
- Reasonably available capacity would reduce rapidly in the short term and medium term – halving by 2031, before being exhausted by 2041, leaving no reasonably available capacity for a period of at least 12 years.

This is illustrated on Chart 1, below.

Chart 1: Reasonably Realised Dwellings Within the Pakuranga THAB Case Study Area



This all indicates that the draft FDS's position that "*much of*" the plan-enabled capacity will be realised within the next 30 years is likely to be inaccurate. This is likely to be less than half, with most of the stated capacity being 'locked up' due to existing recent development patterns or development capacity not being maximised when redevelopment occurs.

Auckland Council should be required to review this matter and undertake its own analysis of recent development up-take in order to estimate the development capacity that is reasonably expected to be realised.

7. Conclusion

Determining that sufficient development capacity has been provided in accordance with clause 3.2 of the NPS-UD should have required Auckland Council to identify restrictions under each of the following layers (distributed pro-rata when determined on a catchment basis) and then identify the maximum development capacity enabled for each site or neighbourhood that is unrestricted by each layer. This would need to be undertaken three times, in accordance with the short term, medium term and long term.

- For 'plan-enabled' capacity, any restrictions related to zoning –noting that most zones provide for unlimited dwellings as a restricted discretionary activity.
- For 'infrastructure-ready' capacity:
  - Any restrictions to providing for water supply – such as the maximum capacity of bulk pipelines.
  - Any restrictions to providing for wastewater disposal in each catchment – such as the maximum capacity of a pump station.
  - Any restrictions to providing for stormwater disposal in each catchment – although given this relates to impervious areas rather than the number of dwellings, it is expected that this would not be a critical constraint.
  - Any restrictions related to the capacity of the transport network, such as identifying capacity issues with key intersections if additional dwellings are enabled in certain areas.
- For 'feasible' capacity, the results from Council's feasibility model (for each area).
- For 'reasonably expected to be realised' capacity, the number of dwellings indicated to be delivered by developers of large brownfield and greenfield sites within the relevant timeframes or an assumed realisation based on historic trends (similar to the Pakuranga THAB area case study above).

While Auckland Council appears to have considered most these matters to various degrees (but not to the extent anticipated), the draft FDS and its supporting material does not provide any confidence to the submitter that all of the above considerations have been appropriately made as required by the NPS-UD.

By failing to do so, the conclusions reached in the draft FDS regarding (and resulting from) the availability of sufficient development capacity are considered to be insufficiently justified and should not be relied upon.

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Table 2:
Sites within the Pakuranga THAB Case Study Area

Dwelling Count 2020	Dwelling Count 2023	Site Address	Title Identifier	Title Type	Title Age	Site Area	Maximum Capacity*
Pre-2000 Titles							
1	1	1 Ayr Road Pakuranga Auckland 2010	NA1176/44	Freehold	Pre-2000	916 m²	15 dwellings
2	2	4 Ayr Road Pakuranga Auckland 2010	NA2D/1057	Freehold	Pre-2000	883 m²	14 dwellings
3	3	6 Ayr Road Pakuranga Auckland 2010	NA19C/1021	Freehold	Pre-2000	1,378 m²	22 dwellings
4	4	6A Ayr Road Pakuranga Auckland 2010	NA19C/1022	Freehold	Pre-2000	1,184 m²	19 dwellings
5	5	7 Ayr Road Pakuranga Auckland 2010	NA1171/96	Freehold	Pre-2000	913 m²	15 dwellings
6	6	8 Ayr Road Pakuranga Auckland 2010	NA1324/53	Freehold	Pre-2000	883 m²	14 dwellings
		9 Ayr Road Pakuranga 2010				913 m²	15 dwellings
7	7	1/9 Ayr Road Pakuranga Auckland 2010	NA75D/292	Cross-lease	Pre-2000		
8	8	2/9 Ayr Road Pakuranga Auckland 2010	NA79D/44	Cross-lease	Pre-2000		
9	9	11 Ayr Road Pakuranga Auckland 2010	NA1171/94	Freehold	Pre-2000	916 m²	15 dwellings
		13 Ayr Road Pakuranga 2010				916 m²	15 dwellings
10	10	1/13 Ayr Road Pakuranga Auckland 2010	NA70C/707	Cross-lease	Pre-2000		
11	11	2/13 Ayr Road Pakuranga Auckland 2010	NA72B/591	Cross-lease	Pre-2000		
		15 Ayr Road Pakuranga 2010				918 m²	15 dwellings
12	12	1/15 Ayr Road Pakuranga Auckland 2010	NA86C/662	Cross-lease	Pre-2000		
13	13	2/15 Ayr Road Pakuranga Auckland 2010	NA89B/984	Cross-lease	Pre-2000		
		17 Ayr Road Pakuranga 2010				918 m²	15 dwellings
14	14	1/17 Ayr Road Pakuranga Auckland 2010	NA57C/851	Cross-lease	Pre-2000		
15	15	17B Ayr Road Pakuranga Auckland 2010	NA57C/852	Cross-lease	Pre-2000		
16	16	16 Ayr Road Pakuranga Auckland 2010	NA1191/61	Freehold	Pre-2000	883 m²	14 dwellings
17	17	18 Ayr Road Pakuranga Auckland 2010	NA1333/96	Freehold	Pre-2000	883 m²	14 dwellings
		19 Ayr Road Pakuranga 2010				921 m²	15 dwellings
18	18	1/19 Ayr Road Pakuranga Auckland 2010	NA70C/307	Cross-lease	Pre-2000		
19	19	2/19 Ayr Road Pakuranga Auckland 2010	NA88A/793	Cross-lease	Pre-2000		
20	20	20 Ayr Road Pakuranga Auckland 2010	NA1198/57	Freehold	Pre-2000	883 m²	14 dwellings
21	21	21 Ayr Road Pakuranga Auckland 2010	NA26A/1320	Freehold	Pre-2000	923 m²	15 dwellings
22	22	22 Ayr Road Pakuranga Auckland 2010	NA1171/93	Freehold	Pre-2000	893 m²	14 dwellings
23	23	23 Ayr Road Pakuranga Auckland 2010	NA1832/4	Freehold	Pre-2000	923 m²	15 dwellings
24	24	1 Bennett Road Pakuranga Auckland 2010	NA1331/67	Freehold	Pre-2000	878 m²	14 dwellings
		3 Bennett Road Pakuranga 2010				1,492 m²	24 dwellings
25	25	3 Bennett Road Pakuranga Auckland 2010	NA70C/564	Cross-lease	Pre-2000		
26	26	3A Bennett Road Pakuranga Auckland 2010	NA74B/189	Cross-lease	Pre-2000		
27	27	5 Bennett Road Pakuranga Auckland 2010	NA14B/416	Freehold	Pre-2000	1,012 m²	16 dwellings
		6 Bennett Road Pakuranga 2010				1,439 m²	23 dwellings
28	28	1/6 Bennett Road Pakuranga Auckland 2010	NA63A/117	Cross-lease	Pre-2000		
29	29	2/6 Bennett Road Pakuranga Auckland 2010	NA63A/118	Cross-lease	Pre-2000		
30	30	8 Bennett Road Pakuranga Auckland 2010	NA1186/36	Freehold	Pre-2000	1,472 m²	24 dwellings
31	31	1 Lewis Road Pakuranga Heights Auckland 2010	NA1170/15	Freehold	Pre-2000	1,340 m²	22 dwellings
32	32	3 Lewis Road Pakuranga Heights Auckland 2010	NA26A/196	Freehold	Pre-2000	827 m²	13 dwellings
33	33	5 Lewis Road Pakuranga Heights Auckland 2010	NA1176/48	Freehold	Pre-2000	827 m²	13 dwellings
34	34	9 Lewis Road Pakuranga Heights Auckland 2010	NA1315/72	Freehold	Pre-2000	827 m²	13 dwellings
35	35	7 Lewis Road Pakuranga Heights Auckland 2010	NA1186/38	Freehold	Pre-2000	827 m²	13 dwellings
36	36	15 Lewis Road Pakuranga Heights Auckland 2010	NA1317/68	Freehold	Pre-2000	827 m²	13 dwellings
		183 Pakuranga Road Pakuranga 2010				1,846 m²	30 dwellings
37	37	1/183 Pakuranga Road Pakuranga Auckland 2010	NA63D/964	Cross-lease	Pre-2000		
38	38	3/183 Pakuranga Road Pakuranga Auckland 2010	NA122A/389	Cross-lease	Pre-2000		
39	39	4/183 Pakuranga Road Pakuranga Auckland 2010	NA122A/390	Cross-lease	Pre-2000		
40	40	185 Pakuranga Road Pakuranga Auckland 2010	32786	Cross-lease	Pre-2000**		
41	41	187 Pakuranga Road Pakuranga Auckland 2010	NA128B/922	Freehold	Pre-2000	429 m²	7 dwellings
42	42	187A Pakuranga Road Pakuranga Auckland 2010	NA128B/923	Freehold	Pre-2000	330 m²	5 dwellings
		189 Pakuranga Road Pakuranga 2010				961 m²	16 dwellings
43	43	1/189 Pakuranga Road Pakuranga Auckland 2010	NA25A/40	Cross-lease	Pre-2000		
44	44	2/189 Pakuranga Road Pakuranga Auckland 2010	NA25A/41	Cross-lease	Pre-2000		
45	45	3/189 Pakuranga Road Pakuranga Auckland 2010	NA56A/611	Cross-lease	Pre-2000		
46	46	195 Pakuranga Road Pakuranga Auckland 2010	NA1093/264	Freehold	Pre-2000	923 m²	15 dwellings
47	47	197 Pakuranga Road Pakuranga Auckland 2010	NA1083/84	Freehold	Pre-2000	923 m²	15 dwellings
48	48	199 Pakuranga Road Pakuranga Auckland 2010	NA1087/49	Freehold	Pre-2000	923 m²	15 dwellings
49	49	207 Pakuranga Road Pakuranga Auckland 2010	NA1138/122	Freehold	Pre-2000	923 m²	15 dwellings
		209 Pakuranga Road Pakuranga 2010				954 m²	15 dwellings
50	50	1/209 Pakuranga Road Pakuranga Auckland 2010	NA79D/932	Cross-lease	Pre-2000		
51	51	2/209 Pakuranga Road Pakuranga Auckland 2010	NA81C/821	Cross-lease	Pre-2000		

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Dwelling Count 2020	2023	Site Address	Title Identifier	Type	Age	Site Area	Maximum Capacity*
52	52	6 Reeves Road Pakuranga Heights Auckland 2010	NA28A/1036	Freehold	Pre-2000	928 m²	15 dwellings
53	53	10 Reeves Road Pakuranga Heights Auckland 2010	NA1325/47	Freehold	Pre-2000	928 m²	15 dwellings
		12 Reeves Road Pakuranga Heights 2010				928 m²	15 dwellings
54	54	1/12 Reeves Road Pakuranga Heights Auckland 2010	NA61B/118	Cross-lease	Pre-2000		
55	55	2/12 Reeves Road Pakuranga Heights Auckland 2010	NA61B/119	Cross-lease	Pre-2000		
		14 Reeves Road Pakuranga Heights 2010				928 m²	15 dwellings
56	56	1/14 Reeves Road Pakuranga Heights Auckland 2010	NA76A/160	Cross-lease	Pre-2000		
57	57	14A Reeves Road Pakuranga Heights Auckland 2010	NA86A/108	Cross-lease	Pre-2000		
		16 Reeves Road Pakuranga Heights 2010				928 m²	15 dwellings
58	58	1/16 Reeves Road Pakuranga Heights Auckland 2010	NA64C/573	Cross-lease	Pre-2000		
59	59	2/16 Reeves Road Pakuranga Heights Auckland 2010	NA64C/574	Cross-lease	Pre-2000		
60	60	18 Reeves Road Pakuranga Heights Auckland 2010	NA1570/33	Freehold	Pre-2000	928 m²	15 dwellings
		20 Reeves Road Pakuranga Heights 2010				928 m²	15 dwellings
61	61	1/20 Reeves Road Pakuranga Heights Auckland 2010	NA84C/738	Cross-lease	Pre-2000		
62	62	2/20 Reeves Road Pakuranga Heights Auckland 2010	NA87C/864	Cross-lease	Pre-2000		
		22 Reeves Road Pakuranga Heights 2010				928 m²	15 dwellings
63	63	1/22 Reeves Road Pakuranga Heights Auckland 2010	NA57D/205	Cross-lease	Pre-2000		
64	64	2/22 Reeves Road Pakuranga Heights Auckland 2010	NA61B/1138	Cross-lease	Pre-2000		
65	65	24A Reeves Road Pakuranga Heights Auckland 2010	NA129C/912	Freehold	Pre-2000	293 m²	4 dwellings
66	66	24B Reeves Road Pakuranga Heights Auckland 2010	NA129C/913	Freehold	Pre-2000	210 m²	3 dwellings
67	67	24C Reeves Road Pakuranga Heights Auckland 2010	NA133A/899	Freehold	Pre-2000	275 m²	4 dwellings
68	68	24D Reeves Road Pakuranga Heights Auckland 2010	NA133A/900	Freehold	Pre-2000	324 m²	5 dwellings
69	69	26 Reeves Road Pakuranga Heights Auckland 2010	NA120C/63	Freehold	Pre-2000	594 m²	9 dwellings
70	70	29 Reeves Road Pakuranga Heights Auckland 2010	NA13C/872	Freehold	Pre-2000	931 m²	15 dwellings
71	71	31 Reeves Road PAKURANGA HEIGHTS 2010	896095	Freehold	Pre-2000**	466 m²	7 dwellings
72	72	31A Reeves Road PAKURANGA HEIGHTS 2010	896096	Freehold	Pre-2000**	404 m²	6 dwellings
		33 Reeves Road Pakuranga Heights 2010				870 m²	14 dwellings
71	71	1/33 Reeves Road Pakuranga Heights Auckland 2010	NA79B/948	Cross-lease	Pre-2000		
72	72	2/33 Reeves Road Pakuranga Heights Auckland 2010	NA79B/949	Cross-lease	Pre-2000		
		35 Reeves Road Pakuranga Heights 2010				870 m²	14 dwellings
73	73	1/35 Reeves Road Pakuranga Heights Auckland 2010	NA62D/451	Cross-lease	Pre-2000		
74	74	2/35 Reeves Road Pakuranga Heights Auckland 2010	NA62D/452	Cross-lease	Pre-2000		
		37 Reeves Road Pakuranga Heights 2010				870 m²	14 dwellings
75	75	1/37 Reeves Road Pakuranga Heights Auckland 2010	NA90B/269	Cross-lease	Pre-2000		
76	76	2/37 Reeves Road Pakuranga Heights Auckland 2010	NA90B/270	Cross-lease	Pre-2000		
77	77	39 Reeves Road Pakuranga Heights Auckland 2010	NA12B/1366	Freehold	Pre-2000	949 m²	15 dwellings
		41 Reeves Road Pakuranga Heights 2010				789 m²	13 dwellings
78	78	1/41 Reeves Road Pakuranga Heights Auckland 2010	NA56D/329	Cross-lease	Pre-2000		
79	79	41B Reeves Road Pakuranga Heights Auckland 2010	NA56D/330	Cross-lease	Pre-2000		
						Total Dwellings on Pre-2000 Titles:	79
						Total Max Capacity of Pre-2000 Titles:	839
							760
		2000-2020 Titles					
80	80	25 Ayr Road Pakuranga Auckland 2010	57086	Freehold	18/12/2002	431 m²	7 dwellings
81	81	25A Ayr Road Pakuranga Auckland 2010	57087	Freehold	18/12/2002	400 m²	6 dwellings
82	82	201 Pakuranga Road Pakuranga Auckland 2010	401752	Freehold	27/03/2008	523 m²	8 dwellings
83	83	191 Pakuranga Road Pakuranga Auckland 2010	425498	Freehold	14/07/2009	596 m²	9 dwellings
84	84	193A Pakuranga Road Pakuranga Auckland 2010	425499	Freehold	14/07/2009	428 m²	7 dwellings
85	85	193 Pakuranga Road Pakuranga Auckland 2010	425565	Freehold	14/07/2009	469 m²	7 dwellings
86	86	191A Pakuranga Road Pakuranga Auckland 2010	425566	Freehold	14/07/2009	439 m²	7 dwellings
87	87	203 Pakuranga Road Pakuranga Auckland 2010	489993	Freehold	17/09/2009	538 m²	8 dwellings
88	88	205A Pakuranga Road Pakuranga Auckland 2010	500390	Freehold	14/10/2009	373 m²	6 dwellings
89	89	4 Reeves Road Pakuranga Heights Auckland 2010	490431	Freehold	27/10/2010	520 m²	8 dwellings
90	90	4A Reeves Road Pakuranga Heights Auckland 2010	490432	Freehold	27/10/2010	408 m²	6 dwellings
91	91	205 Pakuranga Road Pakuranga Auckland 2010	534906	Freehold	6/10/2010	275 m²	4 dwellings
92	92	205B Pakuranga Road Pakuranga Auckland 2010	576040	Freehold	17/05/2012	292 m²	4 dwellings
93	93	205C Pakuranga Road Pakuranga Auckland 2010	576041	Freehold	17/05/2012	417 m²	6 dwellings
94	94	205D Pakuranga Road Pakuranga Auckland 2010	576042	Freehold	17/05/2012	389 m²	6 dwellings
95	95	24 Ayr Road Pakuranga Auckland 2010	583142	Freehold	17/09/2012	416 m²	6 dwellings
96	96	26 Ayr Road Pakuranga Auckland 1706	583143	Freehold	17/09/2012	401 m²	6 dwellings
97	97	13 Lewis Road Pakuranga Heights Auckland 2010	614175	Freehold	9/04/2014	421 m²	7 dwellings
98	98	13A Lewis Road Pakuranga Heights Auckland 2010	614176	Freehold	9/04/2014	405 m²	6 dwellings
99	99	27 Ayr Road Pakuranga Auckland 2010	654744	Freehold	4/02/2016	519 m²	8 dwellings
100	100	21 Lewis Road Pakuranga Heights Auckland 2010	654743	Freehold	4/02/2016	238 m²	3 dwellings
101	101	23 Lewis Road Pakuranga Heights Auckland 2010	654742	Freehold	4/02/2016	303 m²	5 dwellings

Dwelling Count 2020	Dwelling Count 2023	Site Address	Title Identifier	Title Type	Title Age	Site Area	Maximum Capacity*
102	102	7 Bennett Road Pakuranga Auckland 2010	728814	Freehold	18/05/2016	507 m²	8 dwellings
103	103	7A Bennett Road Pakuranga Auckland 2010	728815	Freehold	18/05/2016	496 m²	8 dwellings
104	104	4A Bennett Road PAKURANGA 2010	810292	Freehold	16/05/2018	374 m²	6 dwellings
105	105	4B Bennett Road PAKURANGA 2010	810293	Freehold	16/05/2018	367 m²	6 dwellings
106	106	4C Bennett Road PAKURANGA 2010	810294	Freehold	16/05/2018	401 m²	6 dwellings
107	107	2A Bennett Road PAKURANGA 2010	810297	Freehold	16/05/2018	389 m²	6 dwellings
108	108	2B Bennett Road PAKURANGA 2010	810296	Freehold	16/05/2018	352 m²	5 dwellings
109	109	2C Bennett Road PAKURANGA 2010	810295	Freehold	16/05/2018	354 m²	5 dwellings
					Total Dwellings on 2000-2020 Titles:		30
							160
		2020-2023 Development Sites					
110		28 Reeves Road and 25-37 Lewis Road				959 m²	15 dwellings
	110	28 Reeves Road PAKURANGA HEIGHTS 2010	933948	Freehold	30/07/2020		
	111	37 Lewis Road PAKURANGA HEIGHTS 2010	933949	Freehold	30/07/2020		
	112	35 Lewis Road PAKURANGA HEIGHTS 2010	933950	Freehold	30/07/2020		
	113	33 Lewis Road PAKURANGA HEIGHTS 2010	933951	Freehold	30/07/2020		
	114	31 Lewis Road PAKURANGA HEIGHTS 2010	933952	Freehold	30/07/2020		
	115	29 Lewis Road PAKURANGA HEIGHTS 2010	933953	Freehold	30/07/2020		
	116	27 Lewis Road PAKURANGA HEIGHTS 2010	933954	Freehold	30/07/2020		
	117	25 Lewis Road PAKURANGA HEIGHTS 2010	933955	Freehold	30/07/2020		
111		3A to 3F Ayr Road				911 m²	15 dwellings
	118	3A Ayr Road PAKURANGA 2010	962329	Freehold	27/04/2021		
	119	3B Ayr Road PAKURANGA 2010	962330	Freehold	27/04/2021		
	120	3C Ayr Road PAKURANGA 2010	962331	Freehold	27/04/2021		
	121	3D Ayr Road PAKURANGA 2010	962332	Freehold	27/04/2021		
	122	3E Ayr Road PAKURANGA 2010	962333	Freehold	27/04/2021		
	123	3F Ayr Road PAKURANGA 2010	962334	Freehold	27/04/2021		
112		1/11 to 7/11 Lewis Road				822 m²	13 dwellings
	124	1/11 Lewis Road PAKURANGA HEIGHTS 2010	986211	Freehold	9/06/2021		
	125	2/11 Lewis Road PAKURANGA HEIGHTS 2010	986212	Freehold	9/06/2021		
	126	3/11 Lewis Road PAKURANGA HEIGHTS 2010	986213	Freehold	9/06/2021		
	127	4/11 Lewis Road PAKURANGA HEIGHTS 2010	986214	Freehold	9/06/2021		
	128	5/11 Lewis Road PAKURANGA HEIGHTS 2010	986215	Freehold	9/06/2021		
	129	6/11 Lewis Road PAKURANGA HEIGHTS 2010	986216	Freehold	9/06/2021		
	130	7/11 Lewis Road PAKURANGA HEIGHTS 2010	986217	Freehold	9/06/2021		
113		1/8 to 8/8 Reeves Road				924 m²	15 dwellings
	131	1/8 Reeves Road PAKURANGA HEIGHTS 2010	960582	Freehold	20/06/2021		
	132	2/8 Reeves Road PAKURANGA HEIGHTS 2010	960583	Freehold	20/06/2021		
	133	3/8 Reeves Road PAKURANGA HEIGHTS 2010	960584	Freehold	20/06/2021		
	134	4/8 Reeves Road PAKURANGA HEIGHTS 2010	960585	Freehold	20/06/2021		
	135	5/8 Reeves Road PAKURANGA HEIGHTS 2010	960586	Freehold	20/06/2021		
	136	6/8 Reeves Road PAKURANGA HEIGHTS 2010	960587	Freehold	20/06/2021		
	137	7/8 Reeves Road PAKURANGA HEIGHTS 2010	960588	Freehold	20/06/2021		
	138	8/8 Reeves Road PAKURANGA HEIGHTS 2010	960589	Freehold	20/06/2021		
114		1/12 to 7/12 Ayr Road				881 m²	14 dwellings
	139	1/12 Ayr Road PAKURANGA 2010	964087	Freehold	18/07/2021		
	140	2/12 Ayr Road PAKURANGA 2010	964088	Freehold	18/07/2021		
	141	3/12 Ayr Road PAKURANGA 2010	964089	Freehold	18/07/2021		
	142	4/12 Ayr Road PAKURANGA 2010	964090	Freehold	18/07/2021		
	143	5/12 Ayr Road PAKURANGA 2010	964091	Freehold	18/07/2021		
	144	6/12 Ayr Road PAKURANGA 2010	964092	Freehold	18/07/2021		
	145	7/12 Ayr Road PAKURANGA 2010	964093	Freehold	18/07/2021		
115		1/10 to 8/10 Ayr Road				882 m²	14 dwellings
	146	1/10 Ayr Road PAKURANGA 2010	1001496	Freehold	14/10/2021		
	147	2/10 Ayr Road PAKURANGA 2010	1001497	Freehold	14/10/2021		
	148	3/10 Ayr Road PAKURANGA 2010	1001498	Freehold	14/10/2021		
	149	4/10 Ayr Road PAKURANGA 2010	1001499	Freehold	14/10/2021		
	150	5/10 Ayr Road PAKURANGA 2010	1001500	Freehold	14/10/2021		
	151	6/10 Ayr Road PAKURANGA 2010	1001501	Freehold	14/10/2021		
	152	7/10 Ayr Road PAKURANGA 2010	1001502	Freehold	14/10/2021		
	153	8/10 Ayr Road PAKURANGA 2010	1001503	Freehold	14/10/2021		

Dwelling Count 2020	Dwelling Count 2023	Site Address	Title Identifier	Title Type	Title Age	Site Area	Maximum Capacity*
116		1/2 to 8/2 Ayr Road				880 m²	14 dwellings
	154	1/2 Ayr Road PAKURANGA 2010	1028539	Freehold	11/05/2022		
	155	2/2 Ayr Road PAKURANGA 2010	1028540	Freehold	11/05/2022		
	156	3/2 Ayr Road PAKURANGA 2010	1028541	Freehold	11/05/2022		
	157	4/2 Ayr Road PAKURANGA 2010	1028542	Freehold	11/05/2022		
	158	5/2 Ayr Road PAKURANGA 2010	1028543	Freehold	11/05/2022		
	159	6/2 Ayr Road PAKURANGA 2010	1028544	Freehold	11/05/2022		
	160	7/2 Ayr Road PAKURANGA 2010	1028545	Freehold	11/05/2022		
	161	8/2 Ayr Road PAKURANGA 2010	1028546	Freehold	11/05/2022		
117		1/5 to 8/5 Ayr Road				910 m²	15 dwellings
	162	1/5 Ayr Road PAKURANGA 2010	1065638	Freehold	10/03/2023		
	163	2/5 Ayr Road PAKURANGA 2010	1065639	Freehold	10/03/2023		
	164	3/5 Ayr Road PAKURANGA 2010	1065640	Freehold	10/03/2023		
	165	4/5 Ayr Road PAKURANGA 2010	1065641	Freehold	10/03/2023		
	166	5/5 Ayr Road PAKURANGA 2010	1065642	Freehold	10/03/2023		
	167	6/5 Ayr Road PAKURANGA 2010	1065643	Freehold	10/03/2023		
	168	7/5 Ayr Road PAKURANGA 2010	1065644	Freehold	10/03/2023		
	169	8/5 Ayr Road PAKURANGA 2010	1065645	Freehold	10/03/2023		
118		1/14 to 8/14 Ayr Road				881 m²	14 dwellings
	170	8/14 Ayr Road PAKURANGA 2010	1011015	Freehold	10/05/2023		
	171	7/14 Ayr Road PAKURANGA 2010	1011016	Freehold	10/05/2023		
	172	6/14 Ayr Road PAKURANGA 2010	1011017	Freehold	10/05/2023		
	173	5/14 Ayr Road PAKURANGA 2010	1011018	Freehold	10/05/2023		
	174	4/14 Ayr Road PAKURANGA 2010	1011019	Freehold	10/05/2023		
	175	3/14 Ayr Road PAKURANGA 2010	1011020	Freehold	10/05/2023		
	176	2/14 Ayr Road PAKURANGA 2010	1011021	Freehold	10/05/2023		
	177	1/14 Ayr Road PAKURANGA 2010	1011022	Freehold	10/05/2023		
					Total Max Capacity of 2020-2023 Development Sites:		129
					Total Net Capacity of 2020-2023 Development Sites:		120
					Realised Gross Capacity of 2020-2023 Development Sites:		68
					Realised Net Capacity of 2020-2023 Development Sites:		59
					Unrealised Capacity of 2020-2023 Development Sites:		61
					All Sites		
					Total Max Capacity of all Sites:		1158

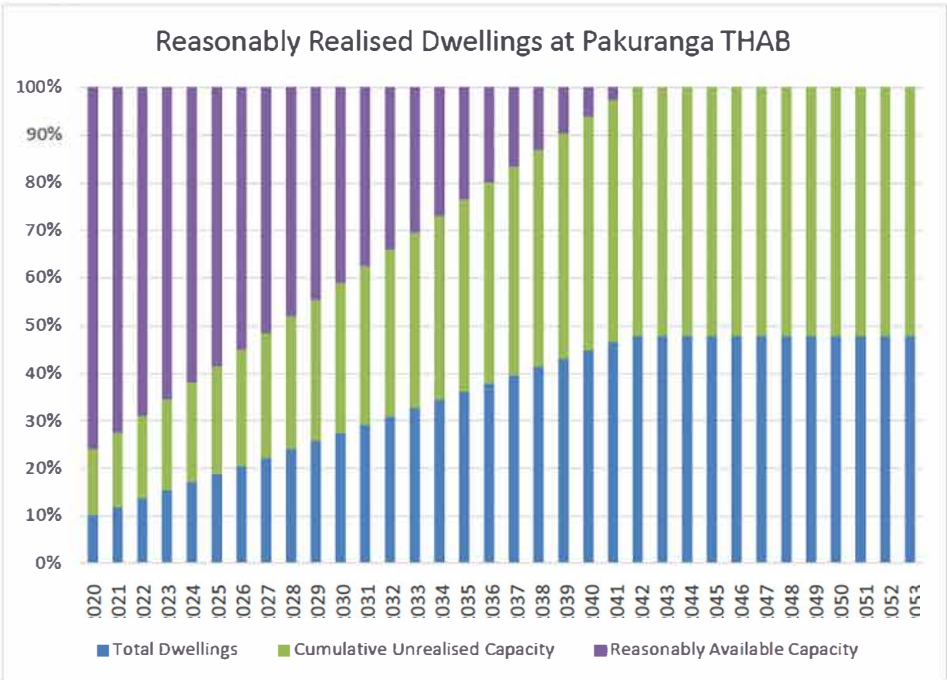
* Maximum Capacity Calculation: Site area times 50% building coverage times 4 storeys, all divided by 120 m² area per dwelling, rounded down to nearest whole number

$$\frac{S \times 50\% \times 4}{120}$$

** While these sites have Records of Titles that were issued after 2000, these Titles created sites around existing dwellings constructed prior to 2000

Table 3:
Extrapolation of Capacity Over Time within the Pakuranga THAB Case Study Area

Year	Additional Dwellings (Net)	Additional Unrealised Capacity	Total Dwellings	Cumulative Unrealised Capacity	Reasonably Available Capacity
2020			118 (10%)	160 (14%)	880 (76%)
2021	20	20	138 (12%)	180 (16%)	840 (73%)
2022	20	21	158 (14%)	201 (17%)	799 (69%)
2023	20	20	178 (15%)	221 (19%)	759 (66%)
2024	20	21	198 (17%)	242 (21%)	718 (62%)
2025	20	20	218 (19%)	262 (23%)	678 (59%)
2026	20	21	238 (21%)	283 (24%)	637 (55%)
2027	20	20	258 (22%)	303 (26%)	597 (52%)
2028	20	21	278 (24%)	324 (28%)	556 (48%)
2029	20	20	298 (26%)	344 (30%)	516 (45%)
2030	20	21	318 (27%)	365 (32%)	475 (41%)
2031	20	20	338 (29%)	385 (33%)	435 (38%)
2032	20	21	358 (31%)	406 (35%)	394 (34%)
2033	20	20	378 (33%)	426 (37%)	354 (31%)
2034	20	21	398 (34%)	447 (39%)	313 (27%)
2035	20	20	418 (36%)	467 (40%)	273 (24%)
2036	20	21	438 (38%)	488 (42%)	232 (20%)
2037	20	20	458 (40%)	508 (44%)	192 (17%)
2038	20	21	478 (41%)	529 (46%)	151 (13%)
2039	20	20	498 (43%)	549 (47%)	111 (10%)
2040	20	21	518 (45%)	570 (49%)	70 (6%)
2041	20	20	538 (46%)	590 (51%)	30 (3%)
2042	15	15	553 (48%)	605 (52%)	0 (0%)
2043	0	0	553 (48%)	605 (52%)	0 (0%)
2044	0	0	553 (48%)	605 (52%)	0 (0%)
2045	0	0	553 (48%)	605 (52%)	0 (0%)
2046	0	0	553 (48%)	605 (52%)	0 (0%)
2047	0	0	553 (48%)	605 (52%)	0 (0%)
2048	0	0	553 (48%)	605 (52%)	0 (0%)
2049	0	0	553 (48%)	605 (52%)	0 (0%)
2050	0	0	553 (48%)	605 (52%)	0 (0%)
2051	0	0	553 (48%)	605 (52%)	0 (0%)
2052	0	0	553 (48%)	605 (52%)	0 (0%)
2053	0	0	553 (48%)	605 (52%)	0 (0%)



Future Development Plan 2023 #8622

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please refer to the attachment

SUBMISSION

TELEPHONE 0800 327 646 I **WEBSITE** WWW.FEDFARM.ORG.NZ

FEDERATED FARMERS OF NEW ZEALAND

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

Date: 31 July 2023

Submission on: **Draft Future Development Strategy**

Submission by: Auckland Federated Farmers of New Zealand

[redacted]

Address for service: [redacted]

1. INTRODUCTION

1.1 Auckland Federated Farmers appreciates this opportunity to submit on Auckland Council's (**AC** or **Council**) Draft Future Development Strategy 2023 (**FDS**).

1.2 We acknowledge any submissions from individual members of Federated Farmers.

1.3 Federated Farmers does not wish to speak to its submission.

1.4 The Auckland province of Federated Farmers has approximately 425 active members, who are also your rural ratepayers.

1.5 Federated Farmers is conscious that there may be significant 'consultation fatigue' out in the community, following the annual plan consultation process and 18 months' worth of significant central government proposals.

1.6 Our members do not want their busy silence to be misconstrued as disinterest in the proposed changes. Given the challenging regulatory and economic environment we are currently in, we acknowledge this may result in a low response rate from the farming community to the consultation process.

1.7 Our members are interested in the sustainable and equitable development of the Auckland Region. We believe a well-balanced FDS is one that provides for the needs and concerns of the agriculture sector in recognition of its significant contribution to the Auckland economy.

1.8 Federated Farmers has an interest in the FDS to ensure that it:

a. Protects highly productive soils from inappropriate use or development as directed by the National Policy Statement for Highly Productive Land (**NPS-HPL)** for regional and national food security.
b. Prevents further urban encroachment on and fragmentation of productive land.
c. Protects farmland from reverse sensitivity effects of urban development to ensure routine work on farms can continue unimpeded.
d. Ensures public infrastructure can cope with further urban development pressures.
e. Recover costs of any new infrastructure fairly and equitably based on who uses and benefits from those services, and;
f. Accommodates growth with higher density housing to create vibrant towns and lower carbon and physical footprints.

1.9 Our submission provides general comments and focuses on key aspects of the FDS including infrastructure, use and development of natural resources, transport, and reverse sensitivity, from the perspective of our farming members.

2. GENERAL COMMENTS

2.1 Given recent weather events, climate change, COVID-19 and a changing legislative context, Federated Farmers congratulates Council on producing a comprehensive FDS for consultation.

2.2 We understand that Council is anticipating significant population growth over the next 30 years of around 520,000 people, and that this will require around 200,000 additional homes. Council's FDS is therefore an important tool to direct growth while balancing economic and environmental considerations.

2.3 Federated Farmers generally supports the spatial framework proposed in the FDS, particularly the principles for a "quality compact growth" approach. Federated Farmers supports identifying spatial priorities to focus investments on a limited number of locations to achieve the greatest benefits of intensification. This approach should ensure that future

growth in new areas is in the right place at the right time, while prioritising growth in existing urban areas.

2.4 Federated Farmers is aware that Local Authorities must have regard to the FDS when preparing or changing a regional policy statement, a regional plan, or a district plan. Council is also strongly encouraged to use the FDS to inform Auckland's Long-Term Plan (particularly its infrastructure strategy) and Regional Land Transport Plans. As such, it is important to make sure the FDS is fit for purpose.

2.5 We generally support the future urban areas proposed for removal (either partially or entirely). The reason for many of these areas being removed is because of the significant hazard constraints including flood plains. It is a sensible to remove these areas from future urban development to reduce the risk to life, and to avoid loss of infrastructure.

3. RURAL AREA CONSIDERATIONS

3.1 The overview document for the FDS highlights key considerations and ways forward for rural areas. Federated Farmers supports these considerations, and thanks Council for acknowledging the value of the rural area as part of the FDS.

3.2 In the past, development has resulted in re-zoning of rural land which has had a big impact on the operation and rateable value of rural land. Federated Farmers reminds Council of the importance of appropriate zoning and maintaining urban boundaries. Council should ensure that it has up to date data on rural settlements, environment, and productivity to inform the future approach to rural areas. We also encourage Council to consult with rural landowners in or near future urban areas as to potential transitional consequences of future development.

3.3 In terms of the ways forward, while we support limiting rural residential growth to protect the natural and productive environments (by focusing growth mainly on the nodes of Warkworth and Pukekohe), it is also important to acknowledge that some small-scale housing (i.e., dwellings on farms) and rural settlements (that support rural production and processing) is required in rural areas. This provides accommodation for those that work in the rural sector (and ensures proximity to these workplaces).

Recommendations:

- Council appropriately zones rural land.
- Council ensure it is informed by up to date data on rural areas, environment, and productivity to inform the future approach to existing rural areas.
- Ensure that landowners in or near future urban areas are consulted as to potential transitional consequences.

- Council provide for some small-scale housing and rural settlements to support operation of primary production businesses.

4. INFRASTRUCTURE

4.1 Federated Farmers supports intensification to increase housing availability as it reduces emissions, protects productive land from fragmentation, and prevents urban sprawl.

4.2 Federated Farmers is aware that intensification, if not managed correctly, can have serious economic and environmental consequences. We are aware that intensification can limit housing choices, may not fit with the market attitude, and may put pressure on existing resources and infrastructure.

4.3 Federated Farmers is also mindful that while urban intensification needs to happen, infrastructure such as the three waters and management of overland flow paths needs to keep pace with this development. Intensification requires parallel improvement of basic urban infrastructure to avoid environmental degradation and redress to sprawling cities.

4.4 Federated Farmers supports investment to accommodate intensification however investments should be financed based on who uses and benefits from those services.

4.5 Federated Farmers supports the continued use and increase of development contributions. We support the use of a development contribution policy where the infrastructure costs of development are recovered by Council from those who are creating the need for that capital investment. This reduces the burden on ratepayers and achieves intergenerational equity.

4.6 Federated Farmers would like to see in the Long-Term Plan (which will be reviewed in 2024) consideration of the FDS and how such a 'user pays' approach to urban intensification will be incorporated to ensure equity for ratepayers.

Recommendations:

- Infrastructure investments should be financed using a 'user pays' approach to reduce burden on ratepayers and achieve intergenerational equity.
- Council considers such an approach when drafting their Long-Term Plan.

5. USE AND DEVELOPMENT OF NATURAL RESOURCES

5.1 It is well known (and evident for the wider Auckland region) that growing cities puts pressure on natural resources. Federated Farmers wishes to reinforce (and it is no surprise) that natural resources are limited, and that intensification impacts the availability of these resources. Freshwater quality and quantity is of particular importance and interest to the farming community and wider food and fibre sector.

5.2 To ensure that rural production can continue and develop, resources that underpin the rural economy including water supply and quality need to be prioritised for food producers. Urban development puts pressure on water and aquifers jeopardizing water quality and recharge for agriculture and communities. Integrated water management, green infrastructure and smart urban planning can mitigate impacts on aquifers.

5.3 Territorial Authorities are limited by resource consent they hold for resources such as water takes and discharges. Intensification could support future applications to, for example, increase water takes for municipal purposes, increase wastewater discharges etc. This could lessen water availability for food production affecting the operation of agricultural business and regional and national food security.

5.4 Federated Farmers are concerned of the potential flow on effects of the availability of resources because of intensification. This is particularly concerning for highly productive land that relies on resources such as water to be operate to its full productive capacity.

5.5 While we are yet to see the NPS-HPL implemented in regional planning documents, it is evident that the directive to protect highly productive land will set the scene for development moving forward. The absence of considered decision-making in regards to productive land in the past has resulted in uncoordinated urban expansion over, and fragmentation of, highly productive land when less productive land is both usually available and better suited for urban use. We are yet to see what the flow on effects of this has been.

5.6 Federated Farmers would like to better understand how the FDS will link the requirements of the NPS-HPL in protecting the productive capacity of highly productive land.

Recommendations:

- Prioritise availability and quality of natural resources such as water and land for primary production.
- Information for Federated Farmers to better understand how the FDS will link the requirements of the NPS-HPL in protecting the productive capacity of highly productive land.

6. TRANSPORT

6.1 Federated Farmers supports the logic that housing needs to be located close to shops and public transport to reduce emissions. It will also mean less traffic congestion which is currently a significant cost for farmers and other businesses who rely on the roading network.

6.2 Federated Farmers agrees that it is efficient to focus development in existing urban areas that already have access to key infrastructure such as public transport, wastewater infrastructure and other services. This approach limits urban sprawl, lowers infrastructure costs, and reduces greenhouse gas emissions.

6.3 Federated Farmers supports Council in their recognition of the remoteness of rural communities and the implications of this in terms of reducing emissions. We agree that rural issues need rural solutions to help rural communities adapt to reduced emissions. We encourage Council to keep in mind rural issues when making decisions to incentivise lower emissions.

6.4 It is also important to highlight that rural transport and nodes are very different to urban nodes. Local roads are very important part of the roading network and are a lifeline for primary producers to get inputs to their businesses, and outputs (e.g., livestock, milk, crops, timber, etc.) to the processor. Rural nodes cover a much wider catchment and play a very different role in terms of providing resources to the rural population.

6.5 Federated Farmers would like to see the implementation strategy for the FDS consider the importance of both rural transport and rural nodes and the vital link they provide for the wider rural community. Federated Farmers would like to see sufficient upgrades of rural nodes and roading network to address the cumulative effects of growth in or near rural areas.

Recommendations:

- Council engages with rural communities to develop practical solutions for rural communities to reduce emissions.
- Implementation strategy to consider how rural transport and nodes will be managed within the FDS.
- Sufficient upgrades of rural nodes and roading network to address the cumulative effects of growth in or near the rural areas.

7. REVERSE SENSITIVITY

7.1 While Federated Farmers supports limiting housing growth in rural areas, growth that does occur may be incompatible with existing land use activities, effects, and perceptions of the natural character of the rural area.

7.2 This incompatibility in or near a rural area is a concern for Federated Farmers as existing land uses for primary production are vulnerable to complaint from newly established and more sensitive activities resulting in negative consequences for the existing land use.

7.3 Minimising the potential for reverse sensitivity effects is essential. This is affirmed in the NPS-HPL. Council has the ability to restrict land use change in rural areas without appropriate controls and ensure that existing land used for primary production can continue to operate without restriction.

7.4 Federated Farmers supports Council in their recognition that growth near or in rural areas is subject to reverse sensitivities and that this needs to be minimised so that rural production can continue and develop. Rural areas contribute significantly to the Auckland's natural environment, character, economy and food supply and it is therefore important that existing land uses for primary production can operate to their full potential.

Federated Farmers thanks Auckland Council for considering our submission.

About Federated Farmers Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents the majority of farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers.

The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

This submission is representative of member views and reflect the fact that local government rating and spending policies impact on our member's daily lives as farmers and members of local communities.

FEDERATED FARMERS OF NEW ZEALAND

Future Development Plan 2023 #8623

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please refer to the attachment

FEEDBACK ON CONSULTATION DRAFT AUCKLAND FUTURE DEVELOMPENT STRATEGY 2023-2053 (FDS)

To Auckland City Council

Name of submitter: Golden Bay, a division of Fletcher Concrete & Infrastructure Ltd (**GB**)

1 This feedback relates to the FDS, in particular:

a. The Ports of Auckland being identified as a "transformation opportunity".

2 GB could not gain an advantage in trade competition through this submission.

3 The specific matters of the FDS that GB's feedback relates to, and the reasons are set out in **Appendix A** below.

7 GB seeks the reference to the Ports of Auckland being a "transformation opportunity" removed from the FDS.

Signed for and on behalf of **Golden Bay Cement, a division of Fletcher Concrete & Infrastructure Ltd** by its Resource Management Consultants and authorised agents Resource Management Group Ltd



_____

[redacted]

26 July 2023

Address for service of submitter:
Golden Bay, a division of Fletcher Concrete & Infrastructure Ltd
[redacted]

Appendix A

INTRODUCTION

1 GB welcomes the opportunity to provide feedback on Auckland City Council's Draft Future Development Strategy 2023-2053

2 The feedback is broadly organised as follows:

- **Summary of GB's feedback;**
- **Statement of Interest and Background;**
- **General feedback;**
- **Summary of relief sought**
- **Conclusion**
- **Detailed relief sought (contained in Appendix B)**

SUMMARY

Draft Future Development Strategy 2023-2053

3 GB generally supports the Council's overall vision for Auckland, Tāmaki Makaurau growth over the next 30 years set out in the Draft Future Development Strategy (**FDS**).

4 GB also supports that Auckland Council has acknowledged that the protection of existing and planned business zones land for business purposes is an ongoing challenge.

5 However, GB's key concern that the **FDS** identifies the Ports of Auckland as a *"potential major transformation opportunity"* which GB considers contradicts the intention to protect businesses that have a specific functional need to be located at the Port.

6 GB seeks that reference to the Ports of Auckland as a "*potential major transformation opportunity"* be removed from the FDS.

STATEMENT OF INTEREST AND BACKGROUND

7 GB is New Zealand's longest standing cement manufacturer. GB is committed to sustainable products and product transparency which is central to their strategy, vision and values. This includes how they operate, with their New Zealand made cement being independently assessed to demonstrate a 27% lower carbon emissions per tonne of cement than ISC 2020 Baseline.

8 GB has multiple locations throughout New Zealand, with its Service Centre site being located at Eastport, adjacent to the Port of Auckland. Cement is delivered to the Eastport site by sea and is then discharged via pipeline at Bledisloe wharf, stored on-site before being subsequently distributed to customers by road transport.

9 GB's site and the surrounding area is located within the Business – City Centre Zone, the Port Precinct, the Coastal Hazards Overlay and the Auckland War Memorial Viewshaft Overlay. It is also located within a 'walkable catchment' area (refer **Figure 1** below).

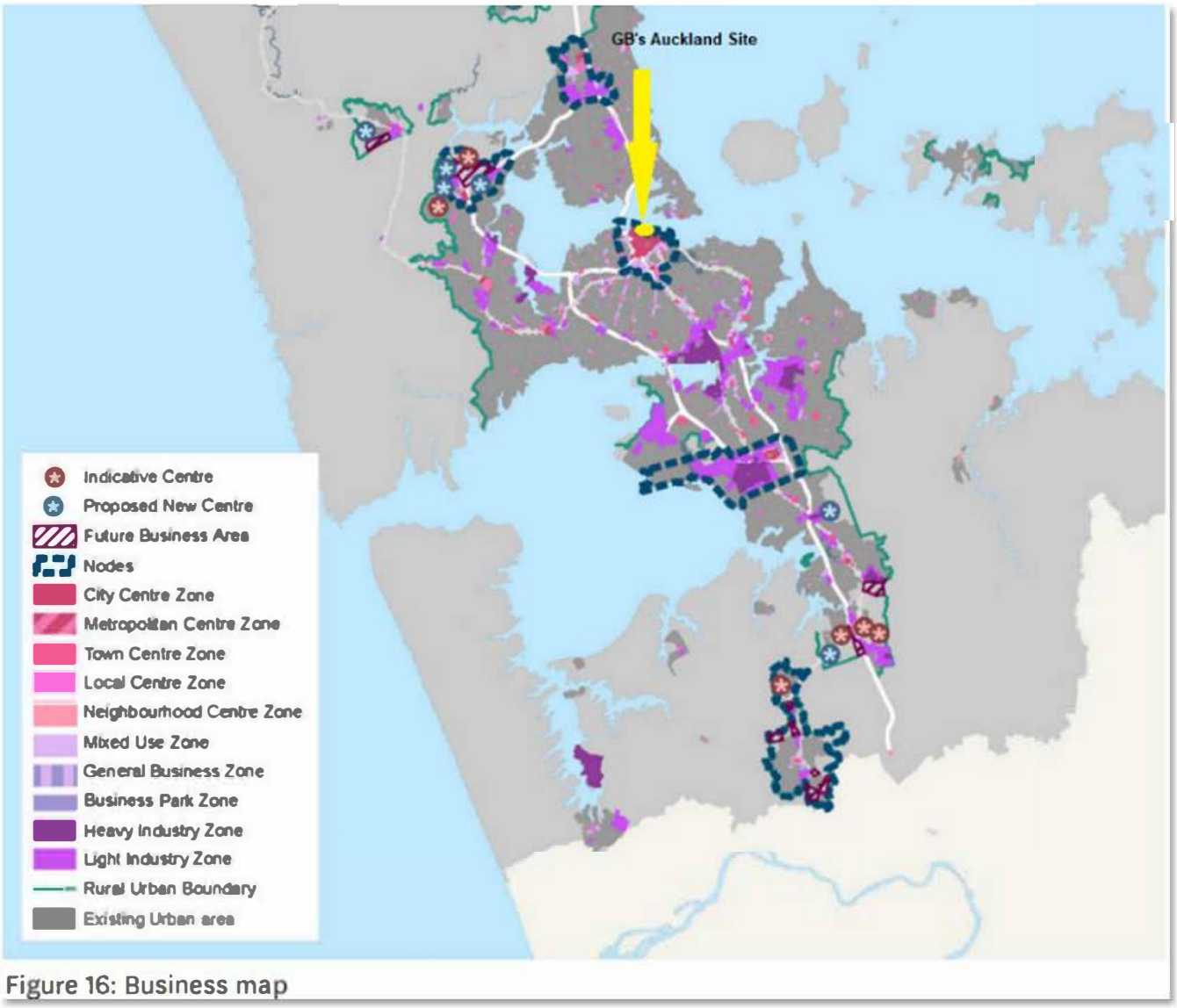


Figure 1: FDS Business Map
Source: FDS, annotated by RMG, June 2023

GENERAL FEEDBACK

Key aims of the feedback

10 Given the housing crisis in New Zealand, the continued supply of building materials is of utmost relevance and importance to GB. As New Zealand's longest standing cement manufacturer, the continued supply of cement products to the residential building industry is a crucial component of ensuring residential intensification can be delivered.

11 The principal aim of this feedback is therefore to ensure the continued operation of the GB Auckland site and the subsequent continued supply of cement products to support residential intensification by establishing the most appropriate provisions to achieve that goal and assist the Council in implementing relevant direction from higher order statutory instruments – particularly the National Policy Statement on Urban Development 2020.

12 Under **Section 3.3 'Development Capacity'** of the FDS, it states:

> *"The protection of existing and planned business zoned land for business purposes is also an ongoing challenge, particularly for industries with specific locational requirements, that are displaced or precluded by activities that are deemed sensitive, and have a much wider range of locational options and relocate. A potential relocation (in part or all) of the Ports of Auckland adds to this uncertainty (see Appendix 9: Information on Major projects). The council's current letter of expectation to the Ports of Auckland signals that planning should start in anticipation of a future relocation."*[1]

13 GB supports the recognition that protecting business land is challenging.

14 However, this message is somewhat diluted or conflicted by the FDS statement that *"the amount of uncertainty means that the Ports of Auckland relocation has been registered as a potential major transformation opportunity*"[2]. GB considers this statement is potentially biased towards redevelopment of this area and should be removed from the document until such time that greater certainty of the Port's future is known.

15 The key concern for GB is that by identifying the Ports of Auckland as a 'transformation opportunity' is sending conflicting messaging regarding the priorities to protect business and industrial land. It also potentially signals that there are urban growth opportunities for the area where there is still a high level of uncertainty.

16 It is contradictory to earmark the Port as a "*transformation opportunity"* when the FDS also states that *"Existing business land, particularly important industrial areas, needs to be safeguarded. Once lost to other uses, such as housing, it is difficult to replace."*[3] It potentially undermines the need to protect industrial uses that have specific locational requirements at the existing Ports of Auckland, particularly from sensitive activities that see the identification of "*transformation opportunity"* as a signal for step change.

17 GB considers it is premature to identify the Ports of Auckland as a "*transformation opportunity"* when it is immediately followed by *"Future Development Strategies will*

[1] Auckland Draft FDS 2023-2053, Page 31

[2] Auckland Draft FDS 2023-2053, Page 52

[3] Auckland Draft FDS 2023-2053, Page 48

provide more detail on the potential regional land use and employment impacts as future decisions are made."[4]

18 GB seeks amendments to draft FDS to ensure that the messaging of the FDS does not conflict its overall intention to protect business and industrial land.

19 The specific details of the amendments sought by GB are set out in **Appendix B**.

SPECIFIC FEEBACK IN RELATION TO THE REGULATORY CONTEXT

National Policy Statement on Urban Development

20 The National Policy Statement on Urban Development (NPS UD) directs that local authority decisions on urban development are to be integrated with infrastructure planning decisions,[5] and that planning decisions contribute to well-functioning urban environments.[6]

21 As part of the NPS UD, Councils are required to prepare a FDS to promote integrated, long-term strategic planning to help the Council set the high-level vision for accommodating urban growth over the long term and identify strategic priorities to inform other development-related decisions. It aims to:

- achieve well-functioning urban environments
- ensure there is sufficient development capacity
- Integrate planning and infrastructure planning and funding

22 A well-functioning urban environment is one which will:

> "*enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future*"[7]

23 GB's operation provides cement products for the building industry to ensure that people and communities can construct residential dwellings now and, in the future, and therefore their continued operation contributes to a well-functioning urban environment and subsequently assists in implementing Objective 1 of the NPS UD.

SUMMARY OF RELIEF SOUGHT

24 In summary, GB seeks that the FDS strengthens the protection of existing business zoned land for business purposes by removing the references to the Ports of Auckland being identified as a "transformation opportunity" by the following amendments:

i. **Insert** additional wording to strengthen the protection of existing business land under section 3.3 Development Capacity as set out in **Appendix B**.

ii. **Amend** Appendix 9: Information on Major Projects as set out in **Appendix B.**

[4] Auckland Draft FDS 2023-2053, Page 52

[5] Objective 6 NPS UD
[6] Policy 1 NPS UD
[7] Objective 1 NPS UD

CONCLUSION

29. For reasons set out in this feedback above, GB considers that amendments to FDS wording to strengthen the overall intention to protect existing business zoned land to ensure that the FDS contributes to a well-functioning urban environment and subsequently assists in implementing Objective 1 of the NPS UD.

APPENDIX B

Draft Future Development Strategy 2023-2053– Detailed Relief

Feedback Name: Golden Bay, a division of Fletcher Concrete & Infrastructure Ltd

FDS Section	Specific section/Page	Position	Reason for Feedback	Relief sought
Section 3.3 Development Capacity	Last paragraph on page 31	Neutral	GB considers that additional wording should be inserted to strengthen the protection of existing business land.	Insert the following words: The protection of existing and planned business zoned land for business purposes is also an ongoing challenge, particularly for industries with specific locational requirements, that ~~are~~ might be displaced or precluded by activities that are deemed sensitive, and which have a much wider range of locational options and relocate. A potential relocation (in part or all) of the Ports of Auckland adds to this uncertainty (see Appendix 9: Information on Major projects). Until more certainty is known about the future of the Ports of Auckland, business zoned land should be protected to ensure businesses continue to be provided for and not undermined by surrounding sensitive development.
Appendix 9: Information on Major Projects	Ports of Auckland, page 51-52			Amend the following 'Ports of Auckland' section as follows: **Ports of Auckland**

FDS Section	Specific section/Page	Position	Reason for Feedback	Relief sought
				The Ports of Auckland currently occupies 77 hectares of land on the city centre waterfront. Several studies have examined the future of the Ports of Auckland in its current location and the impacts of relocating some, or all, of the Port to elsewhere in the region or outside the Tāmaki Makaurau region. The council's current letter of expectation to the Ports of Auckland signals that planning should start in anticipation of a future relocation. Eke Panuku has also started work to consider what such a move could mean for the city centre and the wider Tāmaki Makaurau region. The potential transport implications of a relocation of the Ports of Auckland are currently also being analysed as part of the development of the joint council/central government Auckland Integrated Transport Plan. Therefore, the relocation of the Ports of Auckland, both in terms of the likely timing and its future location, is currently uncertain. Future decisions on the nature and timing of the relocation of the Ports of Auckland will impact on subsequent land use decisions. These decisions could have a significant impact on the city centre, its sub-regional nodes and the future supply of industrial land. **Until such time that more certainty is**

FDS Section	Specific section/Page	Position	Reason for Feedback	Relief sought
				known, industrial land should be continually protected. The relocation of Ports of Auckland would also have significant infrastructure implications, especially for transport. It is too early in the current review processes to forecast these requirements with any certainty. ~~In terms of planning for this Future Development Strategy, the amount of uncertainty means that the Ports of Auckland relocation has been registered as a potential major transformation opportunity.~~ Future Development Strategies will provide more detail on the potential regional land use and employment impacts as future decisions are made.