Future Development Strategy

Late Submissions

WRITTEN FEEDBACK

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

Drury and Opaheke Residents Group Submission on draft FDS proposal

Firstly, we would like to thank you for giving us the opportunity to have our views heard in front of the Council's Governing Body on the 21st July at the Town Hall event. This is our formal written submission.

We are a large group of concerned local residents in the Drury and Opakehe area as we do not support the current FDS proposal to remove future urban zoned areas which had already been finalised after many years of extensive public consultation and hearings (with input from multiple scientific studies and reports).

1. Multiple studies and reports have been completed for this area

The current proposal in this rushed draft FDS is to remove future urban areas due to so called "hazard risk" from stormwater and flood hazards. It is important to note that during the development and approval of the finalised Unitary Plan and the finalised Structure Plan for this area, that these hazards were already well known and studied extensively across multiple reports and these have not changed at all since these reports have been released over the last few years.

The Council's own approved Structure Plan for the Drury and Opaheke area was finalised only in August 2019 which is less than 4 years ago, after multiple studies and public consultations. It is clear that there are areas which are affected by possible flood plains, however, this is the completely unmitigated scenario with no engineered drainage systems or improvements in place and even in this scenario, there are huge areas which are not within these potential flood plains at all.

The council itself has had multiple specialist studies and reports done for this area along. These specialist reports include comprehensive stormwater management plans, geotechnical reports, ecology reports, landscape reports, sustainability reports etc. These studies that have been done for this area are by some of the largest and most respected environmental and engineering consultancies in the country. It is important to recognise that none of these expert reports have recommended the removal of the future urban zoning or have stated that this land cannot be used effectively for urban development.

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

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

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

"The proposed change in land use, from rural to urban, ***offers significant opportunity to reduce existing adverse effects and enhance currently degraded environments****. The Watercourse Assessment Reports (WARs) for the Slippery Creek, Hingaia Stream, Ngakoroa Stream and Oira Creek catchments identified management responses to address*

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existing adverse effects and minimise potential future adverse effects caused by development of the FUZ"

As you can, the Council itself has commissioned this detailed investigation and this is the expert advice received. Similar advice is given across multiple reports from multiple different engineering and environmental consultancies.

The professional advice is that with current engineering solutions, the potential flood hazards can be reduced significantly. In some areas, where it is not feasible to economically mitigate these hazards completely, the mechanisms to prevent building in such areas are already in place through the consenting processes. Therefore, there is already absolutely no risk to the council or to the public that any building will be permitted in areas that will be affected by any unmitigated hazard risks.

2. Practical options available

There are many practical options can be used to address hazards from clever engineering through to good urban design. For example, in some areas where the hazards cannot be fully mitigated or there are additional infrastructure constraints or funding constraints, it is still appropriate to utilise the land in an efficient manner for example with a large lot residential zone. This zoning is specifically catered for locations with more hazard risk and areas with an absence of reticulated services. This just demonstrates that there are cost effective and practical solutions to address these issues. There is no one size fits all approach.

We should instead allow best practice engineering, urban design and the latest environmental science to determine what the actual housing configuration for this area can be. This should be based on detailed scientific analysis rather than pushing out a rushed FDS strategy to rule it out completely and ignoring all the previous expert studies and reports already done (and the ratepayer money that has already been spent to identify and zone these areas as future urban).

It is not rational or appropriate to entirely remove huge chunks of these already approved and zoned future urban areas without any sound scientific basis.

3. Major consequences and uncertainty from this widespread removal of zoning

By rushing through a decision to remove these future urban areas or massively delay other areas, there will be enormous social and economic consequences. This will destroy the livelihoods of thousands and thousands of residents and businesses who have relied on the council's very public finalised Unitary Plan and Structure Plans.

This is completely unfair and unethical for the Council to do this to its own ratepayers and businesses. As a result, this will create severe financial hardship and stress for many residents, families and businesses.

Doing such a flip flop and creating massive uncertainty will certainly destroy the council's reputation and will ruin the public's confidence that the council's will actually adhere to any of their decisions.

As you heard from the many businesses who gave presentations to you on the 21st July, this will certainly deter future investment and development in this city. The credibility and reliability of the council's future decisions will be called into question.

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4. Flawed public survey will lead to biased results

The online submission format is a simple 4 question survey with the only the pros for the proposed plan put in front of each question.

No cons are provided for the public to consider prior to answering the question. This is bias and misleading and encourages the public to simply agree with the question rather than enable an educated public debate about both the pros and cons of the proposed FDS.

By not even providing some basic cons for the public to consider, this is essentially designing the survey to extract as many "agree" answers as possible. It is obvious that this will skew the results. This is of critical importance to get right as this decision will have a massive impact on Auckland's future development and growth.

5. Conclusion

There have also been absolutely zero notification with the residents and homeowners who will be directly affected by this. There has not been even a single letter or email regarding this FDS proposal and the massive changes proposed.

We believe that this FDS proposal to just remove future urban zoning against the recommendations of expert analysis and what can be assumed as the deliberate process decision of not notifying any of the affected homeowners and then attempting a biased public survey is a deeply irresponsible, unethical and unfair approach.

We therefore strongly request that the Council's Governing Body reject this FDS proposal to removal existing future urban zoning.

We would instead welcome the opportunity to work with council and the business and development community to come up with practical and workable solutions instead of this current proposed heavy handed blanket removal approach.

We in fact support some of the proposals the Council has put forward in the draft FDS such as resilient nature-based infrastructure. We believe that this is particularly appropriate in future urban areas where there is undeveloped land and development can occur with a clean slate incorporating nature-based infrastructure in an efficient and cost-effective manner.

This aligns with the professional advice mentioned earlier, that development offers significant opportunities to reduce stormwater issues and actually enhance the local environment. We would fully support this approach.

We believe a collaborative approach between homeowners, council and the business and development community is key to deliver better outcomes for the entire community and drive Auckland's future growth.

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SUBMISSION TO THE AUCKLAND COUNCIL: FUTURE DEVELOPMENT STRATEGY

SUBMISSION BY NGĀTI TAMAOHO

1 AUGUST 2023

1. Introduction

This is a submission by Ngāti Tamaoho to the Draft Future Development Strategy (FDS) of Auckland Council. This submission in particular relates to the Te Auaunga Precinct land (currently called Wairaka Precinct) at Carrington Road, Point Chevalier/Mt Albert.

Ngāti Tamaoho is working collaboratively, as part of Waiohua-Tāmaki rōpū, with the Crown over land development within part of the Te Auaunga Precinct (currently called the Wairaka Precinct). This land was originally part of the Hospital Board lands for the Oakley Hospital. It has progressively owned by Unitec and more recently the Crown. It is part of the Land for Housing programme at which three rōpū, including Ngāti Tamaoho, will develop a portion of this property.

2. General comments about the draft FDS

The Draft FDS has been prepared by the Council under the National Policy Statement on Urban Development and is intended to propose a strategy to provide for and manage Auckland's growth over the next 30 years. It represents a significant change in the current "balanced growth" strategy. The draft FDS:

a) Disproportionately focuses the next 30 years' growth for Auckland being provided for within the existing urban area.
b) Substantially defers the timing for the release of greenfield land for urban development. In some cases this currently identified Future Urban zoned land is set down for 'further investigation' or in some cases removed from future greenfield development.
c) Identifies the significant constraints that Council is operating under in terms of infrastructure.
d) Acknowledges that the targeted approach to existing urban areas will mean that large scale substantial infrastructure and service upgrades and investment will be required.
e) Seeks to prioritise funding to identified significant growth areas, and around key subregional nodes.

The Council expresses a view that the existing urban area already represents significant infrastructure provision, and that it is more efficient to focus investment within these existing areas. The Council relies on a substantial uplift in residential yield across the existing metropolitan area. However the identified areas for growth and associated infrastructure investment are quite limited. If the Council is to place such reliance on brownfield development then infrastructure investment must support this growth.

Ngāti Tamaoho oppose the Draft FDS in its current form. The existing *balanced strategy* which has been in place since 2011 is much preferred.

This submission focuses on the Te Auaunga Precinct and the Carrington Road area.

3. The Opportunity for the Te Auaunga Precinct land to make a significant Contribution to Auckland's Growth

The Te Auaunga Precinct land at approximately 40 ha of vacant or underdeveloped land available for housing, represents the single biggest block of brownfield land on the Auckland isthmus. It should be a key part of the Council's Urban Consolidation growth strategy.

The Draft FDS signals that growth should be focused around town centres and along major public transport corridors. The Te Auaunga Precinct land is ideally located in terms of these characteristics.

- It is within easy walking distance of either the Point Chevalier or Mt Albert town centres.
- It is on the outer link bus service.
- It is in easy walking distance for the major public transport corridors along Great North Road and the Mt Albert rail station.
- It is relatively close to the city centre and with good connections to the CBD.

The Te Auaunga Precinct is subject to a plan change request currently being processed by the Council (in pre-notification stage). That plan change will provide for between 4,000 and 4,500 dwellings within the Precinct. This compares to the 3,500 dwellings provided for within the current Precinct provisions (including student accommodation).

At 4,000-4,500 dwellings, Te Auaunga will make a meaningful contribution to the Council's growth strategy. Even if the plan change is not successful, and development is constrained to the current zoning, this would still make a contribution to growth. That would however represent a material underdevelopment of the land.

The final FDS should recognise the importance of this land and the significant opportunity it offers in terms of providing for Auckland growth on a location which meets the key criteria for growth nodes.

4. Infrastructure

This land is uniquely placed to achieve a high-density development well serviced by infrastructure.

Transport

The land significantly benefits from:

a) The Waterview Tunnel and connections to the North-Western Motorway have substantially reduced traffic volumes in Carrington Road.
b) The southern portion of the precinct is within the walkable catchment of the Mt Albert Rail Station. The central portion is in the walkabout catchment of the Link bus services on Carrington Road, or the high volume bus services along Great North Road accessed by the new pedestrian bridge. The northern portion of the precinct is within easy walkable catchment of the public transport services along Carrington Road (Link service) and the high volume bus services through the Point Chevalier shops.
c) The additional yield of the plan change will mean upgrades are needed in the Carrington Road corridor between Mt Albert and Point Chevalier. This has been funded by the Crown to the value of $113.2 million. This will provide dedicated bus lanes, cycleways and vehicle lanes through this corridor. This will give material improvement in the network connections.
d) The high standard cycleways within the development will link to the north-western cycleway, and the Mt Albert cycleway. It also connects to the Waterview Strait.

Wastewater

The site benefits from the construction of the new *central interceptor*. The current interceptor connecting West Auckland through to Orakei runs through the site. The *central interceptor* will take significant wastewater volume out of this area. That will resolve all but extreme overflows within the combined system, and introduce significant capacity. The *central interceptor* is physically in construction.

Potable water

Potable water is available to the block, but does need an upgrade at Sutherland Road. This is already an identified project within the Watercare Asset Management Plan. With this upgrade already in the budget, there is good potable water supply to the block.

Stormwater

All stormwater matters can be resolved within the broader site. The land benefits from adjoining Oakley Creek and the Waitematā Harbour. The Council's preference is to move stormwater through the precinct as quickly as possible so that in times of peak rain events, stormwater from the land has entered and exited Oakley Creek before the more flood prone waters from upstream arrive and risk impacting flooding to the south. Regardless, this land being close to the mouth of Oakley Creek means that flooding risk is minimal.

None of the stormwater from the land enters the existing Council piped network. All the infrastructure will be upgraded as part of the development.

Overall
This means Te Auaunga Precinct is uniquely placed to address infrastructure to achieve the Council's urban consolidation strategies.

5. Request

a) The Waiohua-Tāmaki rōpū requests that the Te Auaunga Precinct lands should be identified as a key growth node within any FDS.
b) That the required infrastructure funds (noting these are largely funded from the Crown but also the existing Watercare Sutherland potable water supply upgrade) be identified within any FDS.

Late Submission #3

Help us shape Auckland's future growth

Feedback must be received by **Tuesday 4 July 2023.**

Auckland's Future Development Strategy (FDS) sets out the big picture vision for how the city and region should grow over the next 30 years.

Cities can grow in many different ways. We propose that most new housing and business development be in the existing city near town centres, good public transport services and jobs, rather than spread-out across the region.

To protect our environment and ensure new homes are built close to the things that people need – like jobs, education and leisure activities, we propose to reduce greenfield growth. Greenfield growth is development of previously undeveloped land on the edge of Auckland that expands the city.

The draft FDS proposes to improve natural environment outcomes and help to address the impacts of climate change by protecting ecosystems, greening the city, and promoting resilient design solutions.

We want your views on how this "big picture" approach could be improved.

We strongly encourage you to read the proposed approach and accompanying information before answering any of the following questions.

We encourage you to give feedback online at akhaveyoursay.nz/futureauckland, or you can:

Scan and email your completed form to:
futuredevelopmentstrategy@aucklandcouncil.govt.nz

Post your completed form in an envelope to:
Auckland Council
Attention: Future Development Strategy
Freepost Authority 190153
Private Bag 92300, Victoria Street West
Auckland, 1142

Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

First name: _____ Last name: _____

Email address or postal address: _____

Your local board: _____

Is your feedback on behalf of an organisation or business? (If yes, this confirms you have authority to submit on the organisation's behalf)

☐ Yes ☑ No Name of organisation/business: _____

Important privacy information

The personal information that you provide in this form will be held and protected by Auckland Council in accordance with our privacy policy (available at **aucklandcouncil.govt.nz/privacy** and at our libraries and service centres) and with the Privacy Act 1993. The privacy policy explains how we can use and share your personal information in relation to any interaction you have with the council, and how you can access and correct that information. You should familiarise yourself with this policy before submitting this form.

These questions are optional but will help us understand which groups of the community are engaging with us.

What gender are you?

[illegible]

You can also visit AK Have Your Say at akhaveyoursay.nz to find out about, or register to receive regular updates on, consultation activities happening across Auckland

Your feedback (all questions are optional)

Focusing growth

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

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

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

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

- [ ] Agree
- [x] Disagree
- [x] Other
- [ ] I don't know

Tell us why

I don't think we should build on good horticulture land in Pukekohe and Rama Rama / Drury With such good land should be kept for growing onions, fresh green vegetables and potatoes

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?

- [x] Agree
- [ ] Disagree
- [ ] Other
- [ ] I don't know

Tell us why

It is good to be able to walk to shops, parks etc and to build up apartments

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?

- [x] Agree
- [ ] Disagree
- [x] Other
- [ ] I don't know

Tell us why

With climate change houses shouldn't be built on cliffs and swampy land. Edmund Hillary Retirement village was built on boggy land; it was a golf course

Resilient infrastructure

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

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

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

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

- [ ] Agree
- [x] Disagree
- [ ] Other
- [ ] I don't know

Tell us why

Need more improvement

Other feedback

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

Need more room? You can attach extra pages.

Late Submission #4

Submission to Auckland Council on the Draft Future Development Strategy 2023 ("FDS")

As an owner of Future Urban Zone ("Future Urban") land in Auckland, I make the following submission in response to an invitation to comment on the Auckland Council Draft Future Development Strategy 2023 ("FDS").

I **strongly oppose** the Council's approach to the FDS for the following reasons:

1. Removing the future urban zones and concentrating developments on brownfields will completely break the already tipping balance and is highly likely to create significant adverse societal impacts. To have developments focussed on brownfields will also turn Auckland streets into a huge construction site for many years to come – streets that are already densely populated. This would result in a terrible environment for the residents and also increases hazards due to these construction works for Aucklanders.

   The existing Unitary Plan has already considered the varying characteristics of each suburb and has the building density set to a maximum level, where housing supply and environmental impact is balanced. Current high-density areas are already experiencing significant/unresolved issues; little space between neighbours, single garage or no parking causing roadside parking to increase which causes traffic jams, no safe space for kids to play on the property, dangerous road conditions for pedestrians and drivers alike. All these issues are only becoming worse with the amount of tall, high-density terrace/town houses being permitted for construction in these areas.

2. Existing public service facilities in current urban areas, including but not limited to public medical centres, libraries, swimming and fitness centres, public green places, will bear pressure beyond the scope of the proposed FDS regulations, and the possibility of expansion under existing urban conditions (land size, traffic conditions etc) is extremely low. This will cause a lot of inconvenience for existing users and even a shutdown for an extended period of time.

   From the cost and convenience point of view, the construction and development of new public facilities in new urban areas will allow for even distribution of the pressure on existing urban areas. It is a more cost-effective and more feasible way to use taxpayers' money as these newly developed areas will be better constructed and more aesthetically designed to provide quality-of-life improvements for Aucklanders including better irrigation systems, public infrastructures, and public facilities.

3. From an investor's perspective, funds put towards areas with a future are much more attractive. With businesses and investment, the government will also receive more tax funding, this can further be put into support of better infrastructure such as new underground power lines instead of the dangerous overhanging power pylons. This deferral or restriction to the current Future Urban development will not only cost investors time and money, but will also cost the council money as well as confidence from the investors.

Due to the increased CV after these regions were zoned as Future Urban land under the Unitary Plan commencing 15 November 2016, the housing price in these areas also rose sharply. Some individuals have already purchased property and land in these Future Urban land at high prices. The housing market prices are greatly affected by CV; therefore the government must compensate the existing landowners in the Future Urban land under the current Unitary Plan for the loss caused by the fall in house prices as a result of removing these areas as Future Urban land.

10. Restrictions to greenfield growth is absolutely going to cause already high-density areas to increase in price. As Auckland does not have plans to become a skyscraper city, the expansion can only go outwards, and it should as this is the quality of life that people who visit or reside in Auckland want for experience. New Zealand is known for its natural environment which attracts people around the world. People from other countries come here to enjoy a low-density high-quality life, and along with them come the money to support business opportunities. If all of Auckland's growth is focussed on brownfields, it will ruin the character of Auckland city.

    For many Aucklanders, living in a suburb is where they and their family can enjoy space and nature, and commuting to work in an urban centre is already part of the "kiwi culture". The FDS plans to overdevelop the brownfield zones which would only destroy this culture. If Auckland becomes no different from other overpopulated cities with a high cost of living, unaffordable property prices, and tiny living spaces, this will not attract anyone. No people, no business, no future.

Name

Phone

Address

Email

Signed

Dated

Late Submission #5

Submission to Auckland Council on the Draft Future Development Strategy 2023 ("FDS")

As an owner of Future Urban Zone ("Future Urban") land in Auckland, I make the following submission in response to an invitation to comment on the Auckland Council Draft Future Development Strategy 2023 ("FDS").

I **strongly oppose** the Council's approach to the FDS for the following reasons:

1. Removing the future urban zones and concentrating developments on brownfields will completely break the already tipping balance and is highly likely to create significant adverse societal impacts. To have developments focussed on brownfields will also turn Auckland streets into a huge construction site for many years to come – streets that are already densely populated. This would result in a terrible environment for the residents and also increases hazards due to these construction works for Aucklanders.

   The existing Unitary Plan has already considered the varying characteristics of each suburb and has the building density set to a maximum level, where housing supply and environmental impact is balanced. Current high-density areas are already experiencing significant/unresolved issues; little space between neighbours, single garage or no parking causing roadside parking to increase which causes traffic jams, no safe space for kids to play on the property, dangerous road conditions for pedestrians and drivers alike. All these issues are only becoming worse with the amount of tall, high-density terrace/town houses being permitted for construction in these areas.

2. Existing public service facilities in current urban areas, including but not limited to public medical centres, libraries, swimming and fitness centres, public green places, will bear pressure beyond the scope of the proposed FDS regulations, and the possibility of expansion under existing urban conditions (land size, traffic conditions etc) is extremely low. This will cause a lot of inconvenience for existing users and even a shutdown for an extended period of time.

   From the cost and convenience point of view, the construction and development of new public facilities in new urban areas will allow for even distribution of the pressure on existing urban areas. It is a more cost-effective and more feasible way to use taxpayers' money as these newly developed areas will be better constructed and more aesthetically designed to provide quality-of-life improvements for Aucklanders including better irrigation systems, public infrastructures, and public facilities.

3. From an investor's perspective, funds put towards areas with a future are much more attractive. With businesses and investment, the government will also receive more tax funding, this can further be put into support of better infrastructure such as new underground power lines instead of the dangerous overhanging power pylons. This deferral or restriction to the current Future Urban development will not only cost investors time and money, but will also cost the council money as well as confidence from the investors.

Due to the increased CV after these regions were zoned as Future Urban land under the Unitary Plan commencing 15 November 2016, the housing price in these areas also rose sharply. Some individuals have already purchased property and land in these Future Urban land at high prices. The housing market prices are greatly affected by CV; therefore the government must compensate the existing landowners in the Future Urban land under the current Unitary Plan for the loss caused by the fall in house prices as a result of removing these areas as Future Urban land.

10. Restrictions to greenfield growth is absolutely going to cause already high-density areas to increase in price. As Auckland does not have plans to become a skyscraper city, the expansion can only go outwards, and it should as this is the quality of life that people who visit or reside in Auckland want for experience. New Zealand is known for its natural environment which attracts people around the world. People from other countries come here to enjoy a low-density high-quality life, and along with them come the money to support business opportunities. If all of Auckland's growth is focussed on brownfields, it will ruin the character of Auckland city.

    For many Aucklanders, living in a suburb is where they and their family can enjoy space and nature, and commuting to work in an urban centre is already part of the "kiwi culture". The FDS plans to overdevelop the brownfield zones which would only destroy this culture. If Auckland becomes no different from other overpopulated cities with a high cost of living, unaffordable property prices, and tiny living spaces, this will not attract anyone. No people, no business, no future.

Name

Phone

Address

Email

Signed

Dated

Late Submission #6

Submission to Auckland Council on the Draft Future Development Strategy (FDS)

Date

My name is —

Email

Address —

Phone _____

As Auckland resident / Owner of Future Urban Zoned land in Auckland (delete one) I make the following submission in response to an invitation to comment on the Auckland Council Draft Future Development Strategy 2023 (FDS).

I strongly oppose the Council's approach to the FDS which focusses almost all of Auckland's growth in existing areas of Auckland for the following reasons:

1. Brownfields feasible residential capacity of 2.3m houses is highly over-estimated with much of the plan enabled capacity economically unfeasible, and not able to be developed due to limited infrastructure, private restrictive covenants (preventing further subdivision or development), high value existing dwellings, high construction costs (especially for apartments), and lack of market demand for the product.

2. The use of brownfields demolition and redevelopment as the predominant source of land supply is a highly risky strategy that does not provide a resilient supply and limits housing choice by type and location.

3. Infrastructure is already at capacity in brownfield areas including schools, early childhood centres, recreation reserves, hospitals, medical centres, roading, storm water, water, wastewater, and other services and cannot continue to be utilised for 30 years of projected population growth. Costs to upgrade this have not been compared with the same costs complained about in greenfield areas. This will be a budget blow out just like the CRL.

4. Intensification is already taking place in outlying areas of Auckland no closer to the CBD and employment hubs than many current Future Urban locations. Increased density will generate traffic adding further congestion.

5. The FDS ignores the unsatisfied demand for employment zoned land especially land for large footprint buildings. No business capacity study has been published yet no new business sites can be created in brownfields areas. As a result, the price of such land will continue to skyrocket while the FDS completely misses an opportunity to create sustainable residential communities close to new employment areas.

6. The FDS presumes there is no opportunity in ANY FUZ area where development could occur. This shotgun approach wastes expenditure already incurred on infrastructure upgrades. These assets will not be fully utilised if the greenfield land which they service is left undeveloped.

7. Perceived funding constraints should not be a reason to limit greenfield development.

8. Infrastructure triggers to be met before greenfield development are overly conservative and based on the assumption that the entire area is being developed. There is no allowance for smaller scale incremental development.

9. Greenfield developments coped well with the recent rain events in the Auckland region and provided for resilient communities compared with many of the existing brownfield areas. **Hobsonville Point** has been cited as a good example. Many brownfield areas earmarked for growth cannot cope with additional intensification.

10. The FDS deferral of zoning creates severe financial hardship for FUZ landowners who purchased in reliance on the 2017 FULSS. The U-turn signalled by the draft FDS will significantly damage investment confidence for years to come, sending developers to more development friendly cities.

11. It is unconstitutional to embed the FDS in the Regional Policy statement and through that mechanism remove the ability of landowners to apply for and achieve private plan changes.

12. It is most likely illegal for this policy to be introduced without extensive consultation and public hearings.

The outcome I would like to see from my submission is:

- Future urban area development should be allowed for in all FUZ zones where piped services capacity exists or can be provided by developers, especially where nearby business land is included to enable people to live near work and have housing choice.
- Defer the FDS by at least two years until Plan Change 78 is resolved and an accurate assessment of **feasible** brownfield capacity is completed including business land.
- A capacity study is done on infrastructure (particularly three waters) in brownfields areas to ensure it can handle future residential growth and the costs are in fact less than the per unit cost in greenfield areas.
- Initiate alternative funding models to fund infrastructure and allow incremental development to occur in FUZ areas where the infrastructure can be upgraded to allow for it.
- Assess current greenfield development opportunities on a much finer grained basis enabling at least some land to be developed immediately under a revised FDS.

Signed

Dated

Late Submission #7

Submission to Auckland Council on the Draft Future Development Strategy (FDS)

My name is _____ Date _____

Address _____ Email _____

_____ Phone _____

As Auckland resident / Owner of Future Urban Zoned land in Auckland (delete one) I make the following submission in response to an invitation to comment on the Auckland Council Draft Future Development Strategy 2023 (FDS).

I strongly oppose the Council's approach to the FDS which focusses almost all of Auckland's growth in existing areas of Auckland for the following reasons:

1. Brownfields feasible residential capacity of 2.3m houses is highly over-estimated with much of the plan enabled capacity economically unfeasible, and not able to be developed due to limited infrastructure, private restrictive covenants (preventing further subdivision or development), high value existing dwellings, high construction costs (especially for apartments), and lack of market demand for the product.

2. The use of brownfields demolition and redevelopment as the predominant source of land supply is a highly risky strategy that does not provide a resilient supply and limits housing choice by type and location.

3. Infrastructure is already at capacity in brownfield areas including schools, early childhood centres, recreation reserves, hospitals, medical centres, roading, storm water, water, wastewater, and other services and cannot continue to be utilised for 30 years of projected population growth. Costs to upgrade this have not been compared with the same costs complained about in greenfield areas. This will be a budget blow out just like the CRL.

4. Intensification is already taking place in outlying areas of Auckland no closer to the CBD and employment hubs than many current Future Urban locations. Increased density will generate traffic adding further congestion.

5. The FDS ignores the unsatisfied demand for employment zoned land especially land for large footprint buildings. No business capacity study has been published yet no new business sites can be created in brownfields areas. As a result, the price of such land will continue to skyrocket while the FDS completely misses an opportunity to create sustainable residential communities close to new employment areas.

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7. Perceived funding constraints should not be a reason to limit greenfield development.

8. Infrastructure triggers to be met before greenfield development are overly conservative and based on the assumption that the entire area is being developed. There is no allowance for smaller scale incremental development.

9. Greenfield developments coped well with the recent rain events in the Auckland region and provided for resilient communities compared with many of the existing brownfield areas. **Hobsonville Point** has been cited as a good example. Many brownfield areas earmarked for growth cannot cope with additional intensification.

10. The FDS deferral of zoning creates severe financial hardship for FUZ landowners who purchased in reliance on the 2017 FULSS. The U-turn signalled by the draft FDS will significantly damage investment confidence for years to come, sending developers to more development friendly cities.

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12. It is most likely illegal for this policy to be introduced without extensive consultation and public hearings.

The outcome I would like to see from my submission is:

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- Initiate alternative funding models to fund infrastructure and allow incremental development to occur in FUZ areas where the infrastructure can be upgraded to allow for it.
- Assess current greenfield development opportunities on a much finer grained basis enabling at least some land to be developed immediately under a revised FDS.

Signed

Dated

Late Submission #8

Submission to Auckland Council on the Draft Future Development Strategy (FDS)

My name is

Date

Address

Email

Phone

~~As Auckland resident~~ / Owner of Future Urban Zoned land in Auckland (delete one) I make the following submission in response to an invitation to comment on the Auckland Council Draft Future Development Strategy 2023 (FDS).

I strongly oppose the Council's approach to the FDS which focusses almost all of Auckland's growth in existing areas of Auckland for the following reasons:

1. Brownfields feasible residential capacity of 2.3m houses is highly over-estimated with much of the plan enabled capacity economically unfeasible, and not able to be developed due to limited infrastructure, private restrictive covenants (preventing further subdivision or development), high value existing dwellings, high construction costs (especially for apartments), and lack of market demand for the product.

2. The use of brownfields demolition and redevelopment as the predominant source of land supply is a highly risky strategy that does not provide a resilient supply and limits housing choice by type and location.

3. Infrastructure is already at capacity in brownfield areas including schools, early childhood centres, recreation reserves, hospitals, medical centres, roading, storm water, water, wastewater, and other services and cannot continue to be utilised for 30 years of projected population growth. Costs to upgrade this have not been compared with the same costs complained about in greenfield areas. This will be a budget blow out just like the CRL.

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Signed

Dated

Late Submission #9

Submission to Auckland Council on the Draft Future Development Strategy (FDS)

My name is _ Date

Address _ Email

_ Phone

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Signed

Dated

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Submission to Auckland Council on the Draft Future Development Strategy (FDS)

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Address _____ Email _____

Phone _____

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Signed

Dated

Late Submission #11

Submission to Auckland Council on the Draft Future Development Strategy (FDS)

My name is _____ Date _____

Address _____ Email _____

Phone _____

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Signed

Dated

Late Submission #12

Submission to Auckland Council on the Draft Future Development Strategy (FDS)

My name is

Address

Date

Email (

Phone _____

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Signed

Dated

Late Submission #13

Submission to Auckland Council on the Draft Future Development Strategy (FDS)

My name is _ _ Date

Address _ _ Email

_ _ Phone

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Signed

Dated

Late Submission #14

Submission to Auckland Council on the Draft Future Development Strategy (FDS)

My name is

Address

Date

Emai

Phon

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Signed

Dated

Late Submission #15

SUBMISSION TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

This submission is in response to the provisions of the FDS including highlighting issues that Auckland Council has asked for specific feedback on via the Have Your Say webpage (https://akhaveyoursay.aucklandcouncil.govt.nz/future-development-strategy/survey_tools/help-us-shape-auckland-s-future-growth).

Submitter Details

This feedback is provided on behalf of Myland Partners (NZ) Limited

Address for Service

Name: Myland Partners

Attention: Director John Cilliers

Email Address: john@mylandpartners.com

Introduction and Executive Summary

Auckland Future Development Strategy (FDS) 2023-2053

We welcome this opportunity to provide feedback on the future direction and development strategy for Tāmaki Makaurau especially to ensure we will have the capacity for a well-functioning urban built environment and the supporting infrastructure.

Tāmaki Makaurau continues to grow, and recent immigration statistics only help to reinforce the unmet housing need that the region has and thus the importance of the FDS to support future urban areas and associated infrastructure from transport and wastewater networks to community amenities and facilities.

The FDS must encourage an aspirational vision for Auckland as a world class city of quality urban communities that match or exceed international benchmarks – this will drive a long-term growth

strategy that attracts the best innovation, talent, and design into our built environment as opposed to the alternative approach of minimising costs which only leads to cheap and short-term outcomes.

Myland Partners continues to provide a range of urban developments including more affordable housing, many of which have only been made possible through the provision of greenfield developments. Thus, we only support a FDS that includes the supply of more affordable housing as part of the region's overall development capacity if a minimum rate of growth to meet Auckland's population growth also is inclusive of this through some greenfield development.

We are disappointed however that rather than be ambitious, Auckland Councils approach is restrictive and self-limiting by an overly cautious adherence to a 'financially constrained environment'. This negative rationale is being used as an excuse to defer the uptake of development capacity (much of which is only achievable through greenfield development) which has only created uncertainty and confusion in the building and construction sector. Unfortunately, this approach is far from ideal given this is a once in every 6-year opportunity to review the FDS and create an exciting future pathway.

It is much more desirable that the planning for the FDS should be underpinned by an exciting development vision for building Auckland's future urban communities as resilient, vibrant, and prosperous. At the same time, growth of our built environment (including greenfield development) will also ensure in parallel that natural ecosystems are protected and enhanced with alternative transport networks (both public and private) playing a part in the reduction of emissions.

We wish therefore to focus most of our submission on the first part of FDS which proposes reducing or eliminating greenfield's development which we believe is fundamentally flawed and will not deliver the rates of future growth that Auckland's communities will demand.

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

In terms of the National Policy Statement – Urban Development 2020 (NPS-UD) we believe that Council's attempt to reduce greenfield developments and pull back on future demographic growth is a knee jerk reaction to the recent austerity and financial constraints as well as reverting to the preference for piecemeal approach to intensification / infill developments which is a narrow, short-term solution. It is devoid of a holistic approach to infrastructure and so Auckland will continue to lack amenities that support urban development and ensure the growth of the city is "future proofed".

Auckland Councils (Council) suggestion to severely limit greenfield developments and restrict the current urban form and growth pattern as the status quo seems illogical and a knee-jerk political response based on short-term thinking. We would like to understand what information and analysis was used by Council to arrive at this decision? It seems to run contrary to data the building and housing industry is seeing and so can only be based on a very subjective interpretation by Council of its own biases toward infill developments, financial constraints, and capacity (or lack of)

infrastructure delivery. Not surprisingly infrastructure delivery (and its ability to support urban development) for the Auckland region is consistently late or delayed and so never in a position to confidently support long-term growth. We believe Council's inability and lack of confidence in addressing Auckland's infrastructure deficit is being used as an excuse to restrict Greenfields development.

In our view Council's premise in the FDS to cancel or limit the Future Urban Zones in the Unitary Plan and end greenfields development is fundamentally wrong as it is based on a false premise that intensification is a better solution for growth. Apart from the fact that intensification is not supported or desirable for all residential homeowners, the real issue that makes this premise incorrect is that Council's proposed intensification is not supported by infrastructure. Council proposal is an attempt to shoehorn an idea of intensification that ignores the choice that most homeowners value in where they live, the price point that is affordable for their individual budget, and the type of dwelling they want to call home.

Moreover, most of the resource in growing Auckland (and Aotearoa) through the delivery of quality healthy homes has always been made possible by property development companies, group home builders, construction companies and the many small tradespeople that make up our building sector. The demand and growth of new housing under the Unitary Plan to meet the increase in Auckland's population has been delivered through the capacity, risk and investment of property developers and builders, not Council. The reality is that this will never change and is consistent with the delivery of residential housing throughout New Zealand.

It is property developers and builders who will deliver and create prosperous and vibrant communities, critical infrastructure and technology and other mechanisms to reduce greenhouse gas emission. Importantly we should not forget the significant proportion of infrastructure, ecosystem enhancement and emissions reduction planning that has been paid for by property developers and construction companies via development contributions (DC) and infrastructure growth charges (IGC) amounting to hundreds of millions of dollars each year. New roads, parks and other community amenities are often only made possible by property developers and construction companies (in addition to ratepayers' contributions) paying the costs for these services and networks.

Council should instead be looking at more ambitious and innovative financial instruments it can use in addition to the funds provided by DCs, IGCs and ratepayers to support long-term infrastructure strategy that creates future growth for a vibrant and liveable region. Only a proportion of greenfield development can meet Auckland's need for supply of 'more affordable housing' and so if the FDS prevents this then Auckland's housing crisis will only get worse.

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

We don't agree that this myopic focus on limiting development to local centres is feasible. This again is based on an incorrect and false premise that for the FDS to succeed it needs intensification as the way to reduce the dependency and kilometres travelled by cars. This is not supported by valid data and is more an echo of green policy agendas which will only serve to restrict the demand for urban expansion. The consequences of this false assumption underpinning intensification would be a stagnation of growth and a vast series of unforeseen consequences. Rather there is a cogent need for greenfield development that is innovative and inclusive of transport network alternatives which provide homeowners with multi-modal choices to get about other than using private cars.

Council's proposal also ignores the fact that the infrastructure currently supporting local centres and communities is already well past its use by date and in some cases in need of constant repair – for example the 7,000km of pipes that form Auckland's water and wastewater network. The recent sinkhole on College Hill in Auckland's Ponsonby was caused by a leaking wastewater pipe that was over 100 years old. To try and manage growth by a focus on intensification in these local centres across Auckland will simply overwhelm already exhausted infrastructure and not achieve the best outcomes for future communities in a liveable city.

Yours sincerely

Director
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