Future Development Strategy

Organisations

WRITTEN FEEDBACK
Volume 3

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

Future Development Plan 2023 #4944

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?

See attached

#4944

SUBMISSION TO AUCKLAND COUNCIL ON THE DRAFT FUTURE DEVELOPMENT STRATEGY (FDS)

Name: Te Henga Family Trust ( ) c/- R.H. Pickmere ( )
Address: [redacted]
Email: [redacted]
Phone: [redacted]

Date: 30 June 2023

The Trust is the Owner of Future Urban Zoned land at [redacted]. I make the following submission in response to the invitation to comment on the FDS.

The Trust strongly opposes AC's approach and intentions in the FDS for a number of reasons, including:

1. The FDS is ultra vires any statutory authority in any empowering legislation which, if enacted in such failure, will entitle parties to seek redress against AC which may include injunctive rights, judicial review and recovery of costs and damages.

2. It is for AC to take its own legal advice (at more cost to the ratepayers) but some of the background as to what AC should be doing is covered in a number of legislative requirements.

3. There is a National Policy Statement on Urban Development ( ) which was a result of wide consultation which sets out a framework to ensure a well-functioning urban environment. The NPS:UD provides clear and direct objectives and policies to ensure cities are well functioning urban environments and have sufficient development capacity to allow growth up and out in locations that have good access to existing services public transport and networks. The Supreme Court has ruled that, in accordance with the requirements in the RMA, a Council is required to give effect to a National Policy Statement: The Court has ruled that "give effect" means "implement".

4. The Enabling House Supply and Other Matters Amendment Act 2021 (affecting the RMA) addressed the intensification streamlined planning process that promulgates a programme *"that aims to remove barriers to the supply of land to make room for cities to grow up and out"*. A key Government initiative to seek to address the huge undersupply of houses.

5. The Future Urban Zones ( ) were the result of the Unitary Plan ( ) for Auckland.

6. As we all know, the UP was broad based and the culmination of some 5 years' work including consultations, Hearings, Appeals to Environment Court and High Court – the adoption then ending in a staged operative process. A huge amount of work and cost was incurred by AC and parties, but the outcome at least gave a framework that Auckland could work with and giving a degree of certainty of what we wanted Auckland to look like in the future.

7. Considerable work went into how and what growth would look like and where.

8. This also identified FUZ which took into account urban boundaries to protect national productive soils, natural features, rural interface, hapu and iwi values and so on..

9. AC should review submissions made (including its own) to ensure the UP allowed for acceptable outcomes: they are extensive, detailed, and inclusive of a wide range of views.

10. Parties have acted in reliance of the UP and FUZ and made significant decisions in accordance with the same.

11. The FDS does a number of things that breach AC's statutory requirements.

12. This includes:

    - removal of some FUZs;

    - by refusing to allow development in FUZ until future dates which are so far out that it negates any ability to bring such land into availability and use for the prescribed purpose of urban use.

13. There is no statutory basis for the FDS to be used for such purposes which effectively, subverts to UP.

14. The matters which AC seems to advance are the same issues that were considered in the UP process: if AC wants to have a "second bite" at that outcome, the FDS process is not the place to do this and it should take advice as to what would be a permitted process and timeframes. Whatever the process is, AC is highly likely to fall foul of its NPS:UD obligations.

15. The UP took some 6 years to properly work its way through: the FD gives 4 weeks to fundamentally change the UP. In no sense can that be reasonable to allow for a proper planning process and give confidence in the same (a key platform of the RMA), let alone allow time to engage with any external consultants and incur substantial cost and to respond to any Submissions..

16. In terms of specifics, I note the suggestion to defer UD in Drury West. The reasons in the FDS paper are not sustainable or factually correct. We would suggest AC and its consultants have a look at what is actually happening in Drury that support planned urban growth and infrastructure. These include:

    - AC announcing the expansion of Drury to "the size of Napier" (its words) and allowing another 50,000 people.

    - Kiwi Development is putting in a "Sylvia Park" retail development at Drury.

    - NZ Rail is installing 3 Stations as part of the $2.39 billion of transport improvements in South Auckland. This investment is on the basis of an extra 120,000 people expected to live in the area with 40,000 new houses and 38,000 new jobs. Presumably AC worked with Government on such projections and agreed with them. Is AC now saying that basis is not accurate and, if so, will it tell KiwiRail? If not, where did AC anticipate such growth would go? Presumably in FUZ which AC is now deferring to the point of negating FUZ for their intended purpose in any foreseeable future to meet known imminent needs.

    - Drury West is certainly one that will be serviced by major transport networks with very little added capital required from AC: most of that has or will come from Government. This clearly meets one of the key UD requirements.

    - At huge cost, the electrification of Rail to Pukekohe is being completed (but just for the moment ignore the inconvenient fact that the Pukekohe Station will not be ready until 2025, so I am not sure how that is going to practically work for commuters).

    - Fisher & Paykel have announced and is proceeding with its development in Drury West which will spend another $450m in its 2024 financial year for a site that is proposed to hold 15,000 to 20,000 employees.

    - The demographics in Drury have changed: it cannot be described as "greenfields" in the sense of sweeping sveltes of grassland/rural agribusinesses. AC is aware of the continued urban large development from Drury to Pukekohe, including Auranga (Charles Ma), Drury South, Lomai Properties, Blackridge Road, Paerata, and so on. Some of those have been the subject of Private Plan Changes which are very robust processes where the developers have provided and funded much of the required infrastructure and complied with environmental requirements addressed the very aspects now raised in the FDS. AC have agreed with and consented to all of

those: some post Environment Court processes but that is all part of good planning processes. And yet now says its decisions in FUZ does not apply to anyone else. That is extraordinary.

17. The FDS states the preference is to focus any increased development *"within Auckland's existing urban area on achieving more quality, higher density and mixed use development"* (FDS wording). The arrogance and supposed logic of that is breath-taking and unsustainable:

- It should not be an "either/or" and it smacks of the Franklin area being somewhere in the hinterland and not really part of Auckland (ie contrary to what the Supercity is supposed to be achieving).

- At any level or criteria, the current urban Auckland environs cannot cope now on infrastructure issues without overloading it more (for example, ask for actual reports of wastewater discharge into harbours, which is appalling) or provide full details of the basis on which AC is relying to make such statement to give confidence (as part of a planning process) that such a decision is reasonably sustainable to only look to pursue such option and remove any "out" growth.

- The underlying premise for the FDS seems to be lack of capital and funds. That is not unique to AC and is relevant to all urban developments / cities in the world to become a quality place for us all. None of us is expecting "instant" available funding / capital but there are many funding structures for infrastructure assets that recognise longer term returns and addressing intergenerational spread. To simply "turn off the tap" for people that currently want to live, work and contribute to Auckland will have long term negative consequences.

18. At a time when Auckland and New Zealand needs clear guidance and support to be the best we can to build a sustainable future for everyone, the FDS is a very shallow and regressive step that will result in lack of confidence for all: including anyone seeking to invest and make Auckland their home.

Te Henga Family Trust

by:

[redacted]_____

R H Pickmere
Trustee

Future Development Plan 2023 #4946

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Your feedback

Focusing growth

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

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

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

Disagree

Tell us why

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

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

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

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

1. To date there has been a lot of consultation in Dairy Flat that has gone nowhere, at a cost of time and money.

2. The further intensification of already developed areas is going to put more pressure on existing infrastructure. Poor maintenance of current infrastructure has not coped with weather patterns, so how is additional intensification of housing/development going to be managed without overload ? Infrastructure needs to be improved to meet current loads before imposing more.

2. We would like to see planning of developments using the model of Hobsonville Point where there is a variety of housing and follows a big picture plan rather than continual botching..

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

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

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

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

Tell us why

Resilient infrastructure

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?

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

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

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

#4946

SUBMISSION

AUCKLAND COUNCIL FUTURE DEVELOPMENT STRATEGY JUNE 2023

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

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

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

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

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

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

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

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

Regards

…

Dairy Flat

Future Development Plan 2023 #4990

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Your feedback

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

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

Disagree

Tell us why
Refer to attachment.

Accessible local centres

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

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

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

Disagree

Tell us why
Refer to attachment.

Avoiding hazards

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

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

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

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

Disagree

Tell us why
Refer to attachment.

Resilient infrastructure

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

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

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

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

Disagree

Tell us why
Refer to attachment.

Other feedback

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

Refer to attachment.

Future Development Plan 2023 #4991

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Your feedback

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

Agree

Tell us why
It makes sense.

Accessible local centres

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

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

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

Agree

Tell us why
It is logical.

Avoiding hazards

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

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

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

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

Agree

Tell us why
We should not increase our potential for future disasters.

Resilient infrastructure

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

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

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

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

Agree

Tell us why
We should work with nature, not against it.

Other feedback

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

Future Development Plan 2023 #5034

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Your feedback

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

Disagree

Tell us why

Auckland's existing infrastructure is already overtaxed and will need significant investment to support intensified housing.

Auckland needs new developments like Paerata Rise, with modem environmental design and integrated transport infrastructure to accommodate future growth.

-Paerata Rise has a new train station planned for 2025 with an integrated transport hub including busses, bikes and a park and ride.

West Paerata is scheduled in the Pukekohe Paerata Structure plan for development in 2008 - 2022.

Your proposal suggests delaying that until 2040.

There is no sense in this given the transport infrastructure is there from 2025.
We ask that you allow the development of West Paerata in 2025 in line with the train station and Pukekohe / Paerata Structure Plan

Accessible local centres

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

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

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

Disagree

Tell us why

New centers like Paerata Rise are needed on greenfields sites to accommodate Auckland's growth in an attractive and environmentally friendly manner.
They leverage trains to avoid transport issues while creating well planned communities for new families.

Avoiding hazards

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

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

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

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

Agree

Tell us why
This is sensible in areas with genuine, demonstrated and significant risk.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Modern, greenfields developments are designed around these principles and Paerata Rise is a good example.

Seeking to delay surrounding development in West Paerata, against the well thought through Pukekohe/Paerata structure plane manes no sense.
With an environmentally friendly transport hub planned for 2025, West Paerata should be developed in line with this timetable.

Other feedback

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

Well planned greenfields developments are the best way for Auckland to grow. Paerata Rise is a great example of this.

We ask that you let West Paerata develop in 2025 as the new train station and transport hub are opened up. It is a financially prudent and environmentally friendly wat to grow.

Future Development Plan 2023 #5071

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

Agree

Tell us why

It is very cowed in Auckland. I think to extend the edge of Auckland city might have good for living conditions and house coummary.

Accessible local centres

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

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

Agree

Tell us why

Avoiding hazards

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Agree

Tell us why

Resilient infrastructure

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

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

Agree

Tell us why

Other feedback

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

Future Development Plan 2023 #5211

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

Agree

Tell us why

Accessible local centres

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

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

Agree

Tell us why

Avoiding hazards

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

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

Agree

Tell us why

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Other feedback

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

Future Development Plan 2023 #5711

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

Other

Tell us why

This is dependent upon adequate protections of greenspaces and biodiversity.

Accessible local centres

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

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

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

I don't know

Tell us why

Avoiding hazards

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

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

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

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

Agree

Tell us why

Current policies do not do enough

Resilient infrastructure

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

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

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

Agree

Tell us why

Other feedback

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

Please see our TEPS submission

#5711

Tāmaki Estuary Protection Society (TEPS) Submission on Auckland's Future Development Strategy

Chairperson: [redacted]
Email: [redacted]
[redacted]
[redacted]
Physical Address: [redacted]
[redacted]

Thank you for this opportunity to submit to Auckland's Future Development Strategy.

The Tāmaki Estuary Protection Society (TEPS) is an Incorporated Society whose members are committed to protecting and improving water quality of the Tāmaki Estuary's waterways and enhancing the habitat for native local wildlife. Improved waterways and healthy, natural biosystems provide positive health benefits for all Tāmaki Makaurau.

TEPS participates in and supports the **Tāmaki Estuary Environmental Forum** (TEEF), which has the support of five local boards surrounding the Tāmaki Estuary.

The Tāmaki Estuary has been an undervalued natural and community asset. For many years the Estuary has been detrimentally affected by under investment in pollution control, stormwater management and treatment, and ecological restoration.

TEPS focus includes:

- Improvement in water quality and the ecological health of the Tāmaki Estuary and its waterways.
- Community connection and engagement with the environment of the Tāmaki Estuary and its kaitiakitanga.
- Catchment-wide ecological restoration and thriving biodiversity.

Tāmaki Estuary Protection Society

Executive Summary

This Tāmaki Estuary Protection Society (TEPS) submission requests that Auckland Council include into its Future Development Strategy awareness of and funding options for strategies and actions (current and potential) to address the following:

- **Environmental damage due to cumulative impacts of intensification.**
- **Habitat destruction and biodiversity loss.**
- **Historical failure to remediate impacts.**

Submission

1. **Recognition and remediation of environmental damage due to cumulative impact of intensification.**

   The strategy proposes that most of Auckland's future growth is focussed in our existing urban areas, where most people choose to live, and closer to town centres. This gives people easier access to their daily needs (work, services, and shops) by walking, cycling, and using public transport.

   TEPS acknowledges this is critical for tackling congestion and lowering emissions, and for reducing household transport costs and travel times.

   TEPS requests the negative local environmental consequences of this strategy be fully recognised in the Future Strategy, and remediation actively included in land use planning and fiscal decision making.

   TEPS requests Auckland Council's Future Development Strategy incorporates improved monitoring of, and pro-active remediation for the cumulative environmental damage resulting from increasing population, urban density, and intensified land use.

   This includes measured increases in:

   a) Plastic pollution in local waterways – pre and postproduction plastics.

b) Heavy metal pollution within waterways and on shorelines.
c) Intermittent chemical pollution of waterways feeding into the estuary.
d) Light pollution (see figure one).
e) General rubbish and illegal dumping.
f) Wave action erosion from boat traffic on the Tāmaki Estuary
g) Wastewater / faecal / chemical contamination of waterways (see figure two).
h) Pest animal and plant incursions.
i) Rainwater impacts (scouring, erosion and accumulated mud) from increased impermeable surfaces (see figure three).

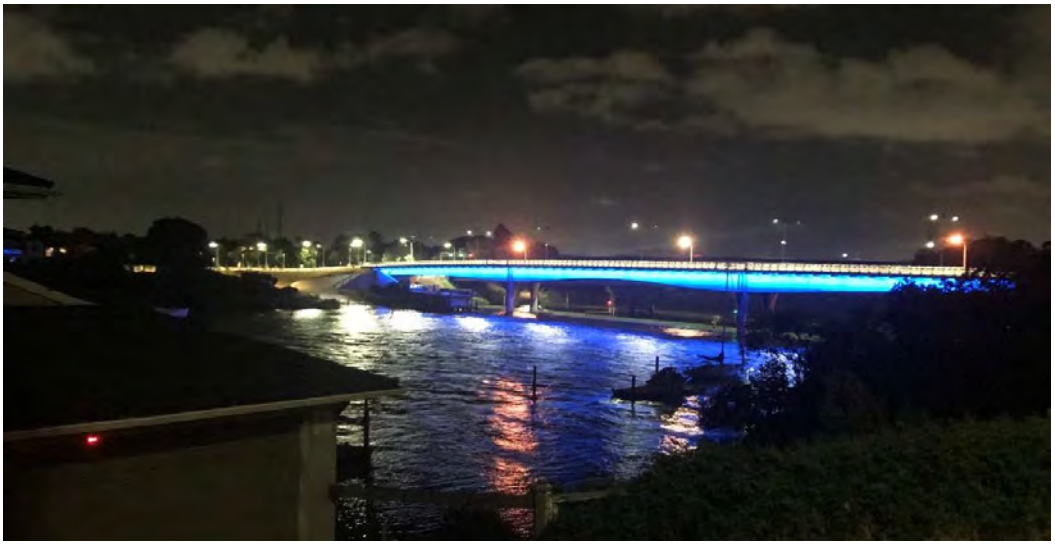


***Figure one**: Light pollution from bridge lighting installed by Auckland Transport for decorative effect.*

2. **Action to address local habitat destruction and biodiversity loss:** Strategies and actions to address and remediate increasing loss of natural species and their habitats. This includes the loss of native forest and shorebird habitats, including roosting, nesting, and feeding areas. This also includes the loss of freshwater and estuarine fish and marine species, from over-harvesting, pollution with toxic contaminants, and habitat destruction.



Figure Two: *Unknown contaminants flow down Omaru Creek.*

3. **Recognition of historic failures to remediate impacts. TEPS requests strategies be developed, and funding opportunities identified to address these failures.** This includes the failure of previous administrations to recognise environmental damage caused by the dumping of waste products in coastal areas and waterways, turning streams into drains, intensification, overfishing, etc. This also includes the negative impact incurred by the failure of previous administrations to complete projects or identify future problems that might arise from their activities.

   Issues of note for the Tāmaki Estuary include:

   a) Failure of the legacy Auckland council to complete a final 500 meters of coastal protection wall at Wai-o-Taiki Bay, leading to the closure of the Reserve pathway, extensive erosion, and resulting in significant sediment pollution (see figure three).
   b) Extensive concrete channelling and undergrounding of natural waterways, heating stream water, destroying habitats and reducing biodiversity.
   c) Historic contamination of Otara Lake.

#5711

Tāmaki Estuary Protection Society

d) Location of historical refuse tips on coastal areas, such as under Glendowie Reserve, Roberton Road Reserve, and Dunkirk Road Reserve. These areas are vulnerable to coastal erosion.
e) Failure to recognise boat traffic wave action on sandy beaches, for example wave action has removed sand from Bucklands Beach.
f) Historical over-fishing – leading to collapse of local species populations.
g) Location of roads in areas geologically vulnerable to erosion and subsidence (Bucklands Beach, Glendowie Road).
h) Local extinctions of shorebird populations.

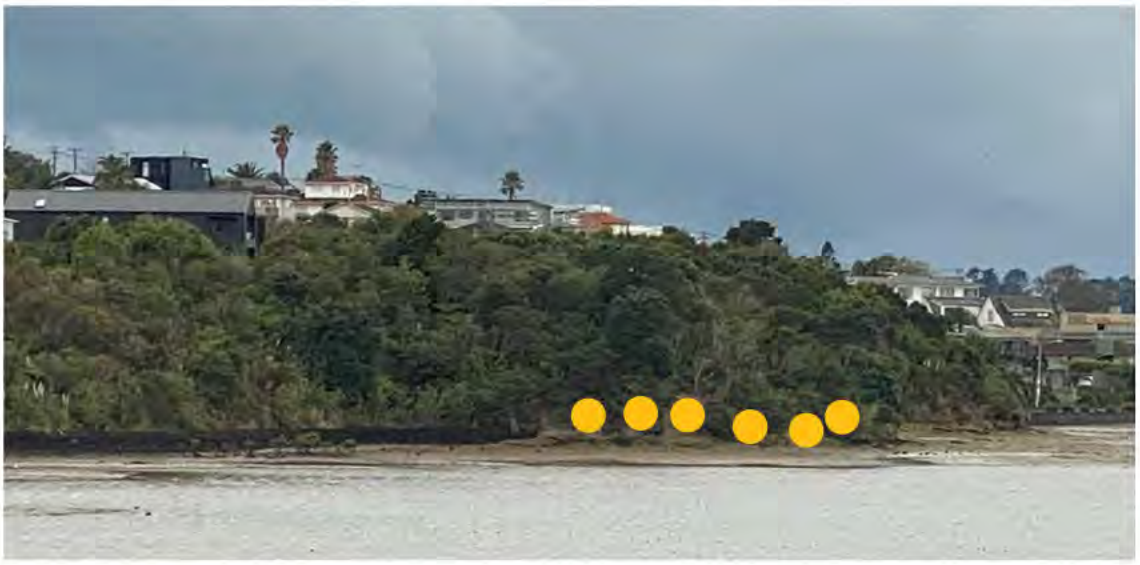


Figure three: *Yellow dots highlight the absence of 500 meters of protective sea wall at Wai-O-Taiki Bay Nature Reserve. The sea wall was left only partially completed by the legacy Auckland Council when Auckland's Councils amalgamated. The unprotected coast has been eroding deep layers of mud sediment into the Bay and leaving the public walkway unusable.*

END

Future Development Plan 2023 #5748

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Refer to the attached written Submission on behalf of Bunleng Chhun regarding the FUZ land at 290 Victoria Street, Pukekohe.

Accessible local centres

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

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

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

Agree

Tell us why

Shortening distances to commercial services and facilities makes sense, but this should not be at the expense of reasonable residential development with good access in reasonable proximity to services or public transport, and should not be limited to walking catchments only for zones such

as the Mixed Housing Suburban Zone and Mixed Housing Urban Zone. Refer to the attached Submission for Bunleng Chhun for more details.

Avoiding hazards

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

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

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

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

Agree

Tell us why

It makes sense to investigate potential natural hazards in relation to development, however, this should relate to locations where there is clear and significant threat, not to all locations that may have an overland flow path or isolated flood prone areas that can be mitigated through appropriate site design and/or engineering solutions. Refer to the attached Submission for Bunleng Chhun with regard to 290 Victoria Street West, Pukekohe.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

This is often easer to achieve for greenfield areas rather than the Council's proposed brownfield restricted locations. In greenfield locations currently identified as the Future Urban Zone, the provision of such infrastructure as raingardens, swales, and detention basins can be better designed as part of comprehensive larger scale development of larger sites, rather than smaller

already existing residential zoned land. The intent of significantly delaying or completely removing Future Urban Zoned land that could deliver tis comprehensive design approach seems at odds with this "Resilient Infrastructure" outcome sought.

Other feedback

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

Refer to the attached Submission on behalf of Bunleng Chhun of MJ Kainga Ltd who wishes to pursue a plan change to live zone land at 290 Victoria Street West, Pukekohe from Future Urban Zone to Residential Mixed Housing Urban Zone, noting the current Future Urban Land Supply Strategy 2017 identifies this as development ready from 2023 to 2027, but the draft Future Development Strategy seeks to push this out to 2035+ (with the "+" being unclear as to whether that may actually be potentially longer but unspecified).

Future Development Plan 2023 #5756

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Your feedback

Focusing growth

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

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

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

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

Tell us why
Please see attachment

Accessible local centres

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

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

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

Tell us why
Please see attachment

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
Please see attachment

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
Please see attachment

Other feedback

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

Please see attachment

planning focus

5 July 2023

Auckland Council
PO Box 92300
Victoria Street West
Auckland 1142

Attn: Future Development Strategy

To Whom it May Concern,

RE: Future Development Strategy Feedback - Oruarangi 2 (Ellett Entities)

On behalf of the Ellett Entities, we provide the following feedback on the draft Future Development Strategy (DFDS) as it relates to Oruarangi 2, the bulk of which comprises the Ellett Entities landholding (see **Annexure A**).

The Ellett Entities own the land as follows:

1. [redacted] are owned by Scoria Sales Limited of which The T.R. Ellett Agricultural Research Trust, which is a registered charity, is the majority shareholder.
2. [redacted] are owned by the [redacted], of which the remaining beneficiaries are two registered charities, Starship Foundation and The T.R. Ellett Agricultural Research Trust.
3. [redacted] is owned by Ernest Ellett/Rye Grass Trust of which the remaining beneficiary is The T.R. Ellett Agricultural Research Trust.

Overview

Under the existing Future Urban Land Supply Strategy (FULSS) Oruarangi 2 was included in the first tranche of proposed plan changes, which were to occur between 2018 and 2022. The FULSS stated: *"The area has sufficient water and wastewater bulk capacity. Structure planning will need to take cultural heritage and landscape values into account, consistent with the Mangere Gateway Precinct."* We are not aware of any structure planning process initiated by Council in relation to this area.

The DFDS identifies Oruarangi 2 being within the first tranche of plan changes in the period 2025-2030, whilst also indicating the area is 'recommended for further investigation'.

The DFDS states the matters identified for further investigation include:

- *Infrastructure (Transport): There are no bulk transport infrastructure projects planned to support this area which will be car-dependent so further development will likely increase emissions.*

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Facsimile 0-9-379 5021
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PO Box 911-361
Auckland 1142
New Zealand

- *Urban form: Further consideration is needed to understand the relationship between Oruarangi 2 and the surrounding environment. … Any development will need to respond to the high cultural values of the area;*
- *Emissions: Potential for higher emissions/private car reliance due to distance from high quality existing or planned public transport, a wide range of jobs, education and other services;*
- *Natural Hazards: Moderate hazard constraints, including approximately 30% of the FUA exposed to the 1% AEP flood plain; risk of coastal inundation and coastal erosion; high-risk slope instability (associated with Maungataketake quarry in the southern half of the FUA), and isolated areas where liquefaction damage is possible.*

We have also reviewed the DFDS Evidence Report that provides further discussion with respect to the potential constraints identified above, and which highlights various areas of natural, cultural, and historic heritage significance within the boundary of (or proximate to) this site. The report concludes that any future work including investigations must be done in collaboration with mana whenua.

Appendix 12 of the DFDS (Implementation Actions) records Oruarangi 2 under the section 'Changes to the Auckland Unitary Plan', noting investigation is required to determine the *"…appropriateness of future urban areas at … Oruarangi 2 for future growth and what the most suitable management response could be (e.g. re-zoning)…*". It is unclear from the DFDS or supporting Evidence Reports what zones Council are referring to in this context.

Sequencing Feedback:

The Ellett Entities support the proposed sequencing of the site within the DFDS (being 2025-2030) and would welcome the opportunity to initiate the structure planning process with Council, mana whenua, and stakeholders.

Further Investigation Feedback:

Commentary within the DFDS and supporting documents identify various matters that require further investigation as part of the rezoning process. The Ellett Entities are minded that these issues can be resolved through a collaborative structure planning process including:

- Engagement with relevant stakeholders (mana whenua, in particular) to ensure that the form of development responds appropriately to the cultural values of the area, natural features/landscape values, and historic heritage.
- Investigation of infrastructure capacity and constraints, to understand implications for land use planning.
- Consideration of the full spectrum of urban land use outcomes to ensure that future urban land use activities complement the function of the wider area, are cognisant of the geographical and environmental context, and make efficient use of existing and planned infrastructure.

#5756

Conclusion

In summary, the Ellett Entities support the DFDS sequencing of Oruarangi 2 and welcome the opportunity to commence a structure planning process with Council, mana whenua, and stakeholders. While the Ellett Entities accept that the subject site has characteristics that require further investigation, they are minded that these can be resolved through the structure planning process to enable an appropriate urban development outcome for the area.

If you require any further clarification, please contact the undersigned.

Yours sincerely



Planning Focus Limited.

Annexure A: Ellett Entities

[redacted]	Legal Description	Area
	Lot 1 Deposited Plan 62092	6.5926
	Lot 1 Deposited Plan 387540	24.5765
	Lot 2 Deposited Plan 416192	14.2427
	Lot 1 Deposited Plan 416192	0.4517
	Lot 3 Deposited Plan 387540	30.3
	Part Allotment 170 Parish of Manurewa	5.61
Total		**81.7735**

Table 1: Ellett Entities land parcels

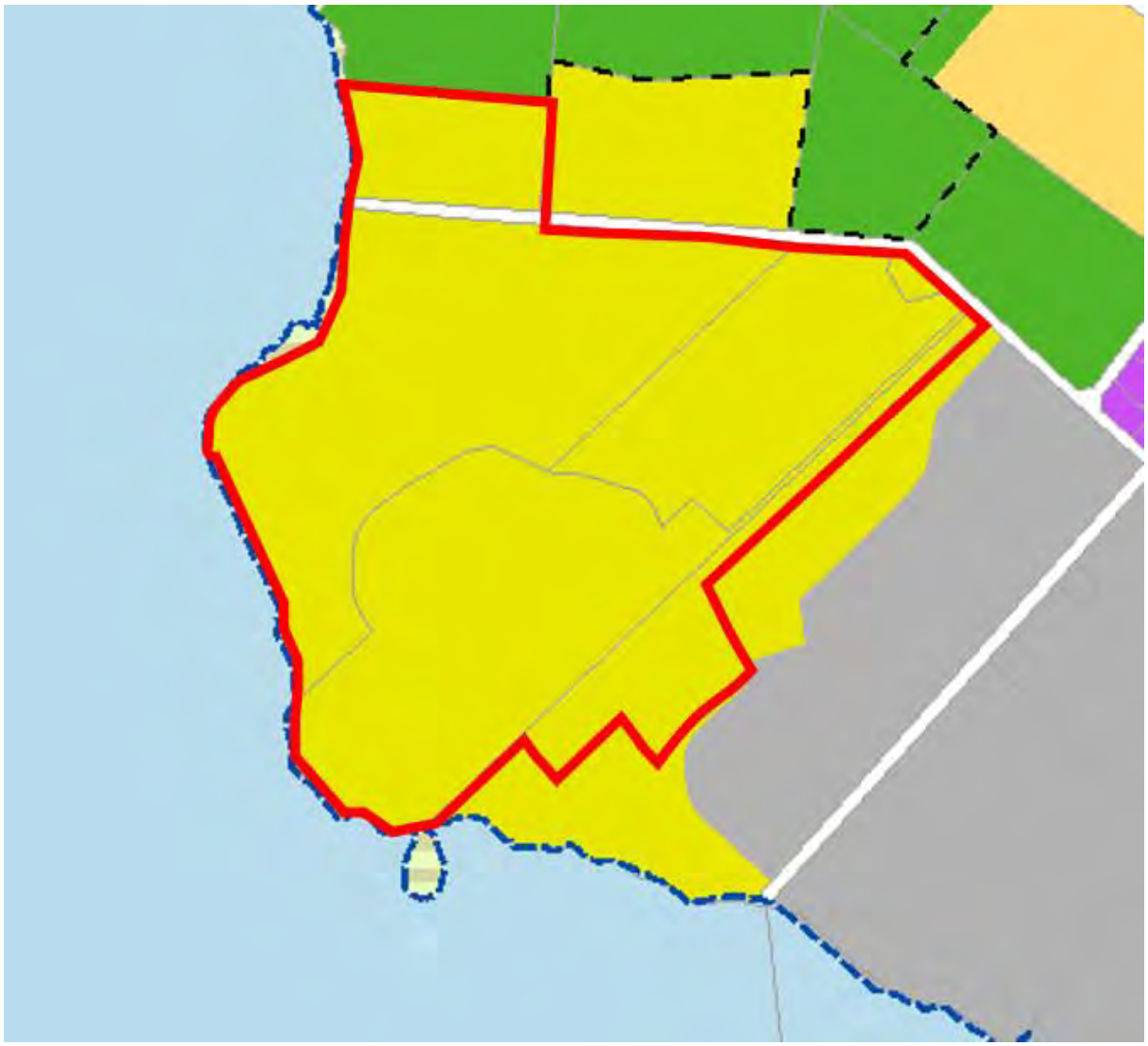


Figure 1: Ellett Entities, AUPOP Planning Maps

Future Development Plan 2023 #5832

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Your feedback

Focusing growth

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

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

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

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?

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

Future Development Plan 2023 #5847

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

Other

Tell us why
Refer to attached letter

Accessible local centres

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Other

Tell us why
Refer to attached letter

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Other

Tell us why
Refer to attached letter

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

Other

Tell us why
Refer to attached letter

Other feedback

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

Future Development Plan 2023 #7207

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Your feedback

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Agree

Tell us why
Limits impact on nature

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Tell us why
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Agree

Tell us why
Please move development away from the coast

Resilient infrastructure

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

Agree

Tell us why
Please include restoring biogenic habitat in the ocean to build resilience to storm surges.

Other feedback

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

I have detailed feedback on shorebird impacts, attached and uploaded here https://blog.shaunlee.co.nz/feedback-on-auckland-future-development-strategy-2023-2053/

Future Development Plan 2023 #7239

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Tell us why
Please see attached

Other feedback

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

Please see attached

FUTURE DEVELOPMENT STRATEGY

SUBMISSION BY THRIVING DEVELOPMENTS LTD: PAERATA

19 July 2023

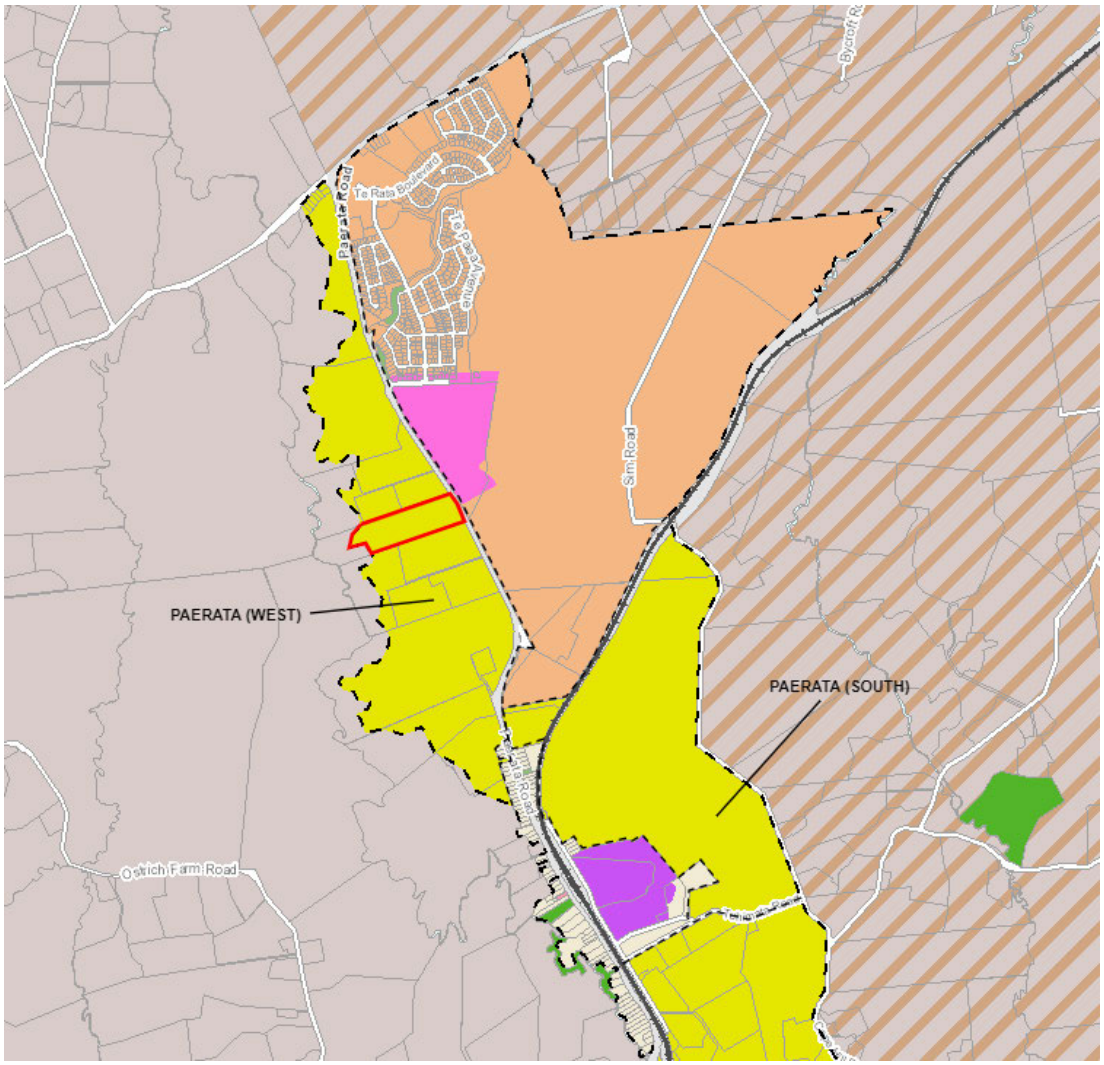
1. Submission

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

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

The map below shows the land holdings of the landowner.

Diagram 1: Land Ownership



2. Summary of Submission

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

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

b. Takes an overly cautious approach to potential natural hazards that does not allow for projects to demonstrate they can avoid, remedy or mitigate the risks from natural hazards;

c. Substantially over-estimates the capacity of Auckland's existing urban areas on the basis of an incomplete and inaccurate evidence base, thereby underestimating the need for greenfield development to meet Auckland's projected population over the next 30 years; and

d. Has not been prepared on the basis of an adequate and complete Housing and Business Development Capacity Assessment (HBA) as required by the National Policy Statement for Urban Development 2020 (NPSUD).

The Paerata area is zoned Future Urban in the Auckland Unitary Plan (AUP) and has long been identified as a key strategic growth area for Auckland. The submitter has significantly invested in the future development of this land on the basis of Council's planning documents including the Auckland Plan, the AUP, the Future Urban Land Supply Strategy 2017 (FULSS) which directs Paerata to be 'development ready' by 2018-2022, and the Pukekohe - Paerata Structure Plan 2019.

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

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

The structure of this submission is as follows:

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

e. Requested decision.

A PAERATA

3. Paerata

Paerata is zoned Future Urban in the AUP.

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

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

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

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

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

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

B GENERAL SUBMISSIONS

4. Proposed Future Development Strategy

The FDS sets out a proposed framework for urban development of Auckland. This reflects a fundamental change in the direction initially chartered through the Auckland Plan and subsequently reinforced through the Auckland Unitary Plan (AUP), the FULSS and the Pukekohe- Paerata Structure Plan.

The effect of the FDS is to fundamentally slow down, defer or remove future greenfields development in some manner suggesting that, at least until the 2030s, Auckland's growth can be successfully managed solely within the existing urban area.

This strategy stems from a series of assumptions which the submitters think are based on a flawed and incomplete evidence base, as detailed later in this submission. For example, the FDS assumes that:

- there is sufficient capacity for Auckland's projected population growth within the existing metropolitan area and the two rural towns of Pukekohe and Warkworth, including through proposed Plan Change 78;
- the future expansion of the rural urban boundary (RUB) should only be managed by the Council through a public plan change process;

- there are overwhelming natural hazard concerns, particularly flooding, which drive the abandonment of some future growth areas or at least the re-examination of greenfield areas;
- the Council's predicament on budgetary constraints and infrastructure funding; and
- the view that core infrastructure necessary to enable land development can only be funded through Council and other public processes; and therefore any new greenfield developments should be deferred given the current financial predicament.

In addition, the FDS is not based on an adequate and up-to-date Housing and Business Development Capacity Assessment (HBA). It has drawn on a 2021 HBA however this document does not include any assessment of business land capacity, and contains different capacity assumptions to those used in the FDS. This is in contrast to the requirements of the National Policy Statement on Urban Development 2020 (NPSUD).

5. **General Comments on the FDS**

(a) The NPSUD requires the Council to prepare an FDS that provides "at least" sufficient development capacity over the next 30 years to meet expected demand. This is to provide for both residential growth and business growth.

(b) The Council, since 2011, has been promoting a balanced growth strategy for Auckland targeting both residential growth and employment/business land supply through urban consolidation, targeted greenfields expansion, and growth of Townships including Paerata.

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

(d) The Council has not implemented any public plan changes to give effect to the structure plans. The private sector, through private plan changes, has funded and provided for these developments.

(e) The submitter supports the review and updating of the FULSS. The legislative imperatives require, and sound practises demand, a well-considered, thought out, tested 'future development strategy'.

(f) The primary concern with the draft FDS is that this is being rushed through seemingly due to the combined factors of infrastructural funding constraint, flooding and geotechnical issues, and the requirement to update the Long Term Plan in 2024. The impact of what is proposed in the FDS is too critical to be treated in this rushed manner.

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

- Further constraining residential and employment land supply.
- Significantly and negatively impacting housing affordability through land supply constraint.

- Having a demonstrable negative impact on the economic development of Auckland and the development sector.

(h) It is accepted that the Council has financial constraints which are negatively impacting infrastructure provision. However, the solution is not to somehow try and stop greenfields development for a decade. If the problem is funding infrastructure, then the solution is to use alternative ways to fund infrastructure such as developer funding and the use of the Infrastructure Financing and Funding Act 2020.

(i) It seems Council is working off a scenario that only the Council can fund infrastructure, rather than using other mechanisms to assist in the sustainable funding and delivery of infrastructure.

(j) In terms of capacity assumptions, the draft FDS is based on extreme, theoretical and unrealistic scenarios for growth potential within the existing urban area. This is assessed using 'plan-enabled' and 'feasible' capacity but fails to assess whether this capacity is reasonably expected to be realised (3.25(c) of the NPSUD). This is a fundamental oversight and completely undermines the FDS's capacity assumptions. While theoretical models can be created to imply a decade's worth of growth within the existing urban area, the reality is that this is not available, and history has proven that this level of growth has not occurred. The asserted development potential to a large extent (but accepting proposed Plan Change 78 may free up more development) has been in place for the last ten years. Urban consolidation is a significant contributor to Auckland's growth. However, it is not the complete answer. It simply does not produce enough housing; because not everybody wants to maximise the development potential of their own property. Nor does it provide the NPS UD required competitiveness margins of 20% excess capacity in the short and medium term and 15% in the long term.

(k) In addition, the draft FDS is based on assumptions that there will be a large uplift in capacity in urban areas from PC78. However, PC78 has been paused to allow time for Council to complete flooding and natural hazard assessments. These assessments will inevitably lead to a reduction in capacity provided for through PC78 in the existing urban area. As a result, there will be implications for the capacity required in greenfield areas to meet forecasted demand. When PC78 implies an approximately 2.345 million dwellings as a theoretical potential, it is based on assumptions that are way beyond reality.

(l) Past experience has shown that when flawed data is relied on, but the market does not deliver to those levels, it constrains housing supply which escalates price, which, for a significant portion of the community, make housing simply unaffordable. This is exactly what the NPS UD is trying to avoid. It seeks to ensure an oversupply of land so the cost of land and housing reduces.

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

(n) The draft FDS is based on a medium growth scenario. It should be stress tested against a high growth scenario and should be tested against actual development including brownfields and greenfields development.

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

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

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

(q) What this shows is that:

(i) Since 2011, there has been a long-established strategic policy direction on the growth for Auckland based on urban consolidation and some greenfields expansion where that is well-thought out and appropriate.

(ii) This has been embraced by the community including the development community.

(iii) Very substantial investment decisions have been made based on this Council commitment.

(iv) The implementation of this strategy has solely relied on the private sector through the development community to rezone FUZ land through private plan changes.

(v) This has delivered additional growth for Auckland.

(vi) The private sector community has funded the necessary infrastructure to service these greenfield areas. It is recognised that the Council does face future funding constraints, this is addressed below.

6. **Plan Change 78**

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

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

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

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

(d) Already the Council has slowed down this plan change process by one year. It is poor public policy practise to place so much reliance on managing such a critical factor as Auckland's growth on an untested plan change.

7. **Constraining land supply directly impacts housing affordability**

(a) The key lesson of the 2000s and mid-2010s is that constraining land supply raises land value expectations in the current owners, which in turn raise the price developers need to pay for the land, which, when passed on to the end resident, significantly raises house cost. Under supply of land distorts normal market operations.

(b) It is not the developer who is making the significant value uplift. Developer margins have been reasonably constant. It is the distortion in the market that raises hope value amongst existing rural and urban landowners, because there is a critical land supply shortage. A healthy over zoning is an important method to ensure these distortions do not occur.

(c) One of the key unintended consequences of the FDS is that it will significantly constrain land supply, which will have a further negative impact on housing affordability.

(d) This is completely at odds with direction from central government through the NPSUD which directs Councils to provide "at least" sufficient capacity and aims to improve housing affordability.

8. **A better way to solve infrastructure**

(a) The FDS effectively identifies the significant budget constraints the Council is facing and their inability to solve infrastructure. The reaction to this is to offer up only one technique which is to slow down or stop growth until the Council's financial position catches up and infrastructure can be funded. Only then does the draft FDS contemplate the release of land for growth.

(b) The fundamental flaw in this draft approach; is that the population does not stop growing and the need for employment land and housing land does not cease until the Council's financial position rectifies itself.

(c) If the problem is the provision of infrastructure, then the FDS should focus on the problem and find alternative ways of working with the private sector to solve infrastructure.

(d) Managing the pace of growth is but one tool available. It is a tool that distorts the market and undermines housing affordability, as proven over the last decade. There are other examples where private sector funding have delivered necessary infrastructure to facilitate growth.

(e) Infrastructure is fundamentally a cost to the government (and its related agencies), the Council (and its CCOs), the private development sector, and the private investment sector.

(f) Rather than constrain the entire Auckland greenfields and satellite township land release programme, a better solution is to analyse on an area by area basis and find innovative ways of funding the infrastructure to enable the release of some or all of that land.

(g) The Council needs to explore options including:

(i) private sector funding of key infrastructure to enable at least early stages of growth (Silverdale West is a strong example of where this can and should happen);

(ii) the option of partnership arrangements between private and public sector to fund infrastructure over time;

(iii) infrastructure funding agreements and the opportunity to up front pay development contributions and build in mechanisms to fund that work as others benefit from the early infrastructure investment;

(iv) Exploring how it can utilise the tools in the Infrastructure Funding and Financing Act 2020.

The FDS seems to assume none of these are applicable or workable. Equal energy should be put into identifying innovative proposals that could work on targeted growth areas.

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

(a) There is no debate that land developed for housing or business needs to either avoid or successfully mitigate the effects of natural hazards including flooding and land stability. However, the solution is not to remove future urban zoning completely where there is "possible" hazard risk. The solution is to ensure that before a development proceeds, it has been robustly tested for vulnerability to natural hazards, and can demonstrate that any identified natural hazard risks can be avoided, remedied or mitigated.

(b) In this regard, the RMA, RPS and Auckland-wide provisions in the AUP including the approach of 'Future Urban' zoning (which requires a plan change before an area can be development) and assessment criteria that apply to any subdivision or development consent, already give the Council full ability to prevent development occurring in high risk natural hazard areas where risk cannot be successfully avoided or mitigated.

(c) There is no urgency to hurry through a rushed FDS. The existing legislative regime and AUP provisions provide all the safeguards needed. There is no need to rush anything through to plug some perceived existing gap.

(d) The existing controls are working well. The vast majority of issues that occurred in the January/February weather events occurred in areas that had been developed a substantial time ago and in existing urban and suburban areas. Those areas developed under the current AUP controls were relatively unimpacted by the storm events.

(e) In terms of flood management, there are multiple engineering solutions that work well and have proved successful on land that can be flood prone if not managed. As long as new development is accompanied by appropriately designed and tested engineering solutions paid for by the developer, then it is not necessary, nor is it appropriate, to constrain development based on a perception of a flood risk or geotechnical risk. The right approach is to ensure the natural hazard risk is successfully managed or removed through robust engineering design and investment.

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

(a) The submitter accepts that a FDS is required under the NPSUD, but do not support the Council's proposed draft and consider that it is based on an inadequate and insufficient evidence base.

(b) Having a blueprint for how Auckland will grow and where and how growth will be managed is an essential informant of the market. Done right, it will direct the market to locate housing and industry in the locations that work best from a social, environmental and economic perspective.

(c) The FULSS has worked reasonably well in informing and directing the location of growth, albeit that the strategy has not been responsive enough to the pace of growth and Council has not had the resources to fully implement it.

(d) Before the FULSS is updated in the form of an FDS, a comprehensive and robust assessment of business and residential capacity and demand is needed (in the form of an HBA) which meets the requirements of the NPSUD. This means assessing business land capacity (which has not been done) and realistic residential capacity including likelihood that plan enabled capacity will be taken up. Capacity figures need to include competitiveness margins. This work will need to incorporate the findings of the Council's natural hazard and flooding work and the outcomes of PC78.

C. SUBMISSIONS SPECIFIC TO PAERATA

11. **Paerata transport infrastructure**

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

- Paerata Arterial
- SH22 Safety Improvements

- SH22 Revocation
- Paerata Transmission Wastewater Pumpstation

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

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

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

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

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

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

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

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

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

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

12. **Paerata infrastructure**

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

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

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

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

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

13. **Managing stormwater in Paerata**

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

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

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

Stormwater can be successfully managed through the Paerata area.

14. **Climate change**

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

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

This recognised, among other things:

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

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

It is too simplistic and incorrect to characterise this area as a commuter suburb for Auckland metropolitan area. It is a social and economic community in its own right. There will be some interchanges and connections back to metropolitan Auckland but there will also be a substantial amount of activity which warrants the opportunity for both expanded residential and employment land. Residents will also include retirees and workers who predominantly or exclusively work from home.

D. WIDER IMPLICATIONS OF FDS

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

The role and expansion of Pukekohe - Paerata as a provincial centre within the region has been signalled and reinforced through the Auckland Plan, AUP, FULSS and the Pukekohe - Paerata Structure Plan. These are highly important strategic documents for Auckland and have been subject to significant public consultation and in the case of the AUP, substantial amounts of expert evidence and hearings before an Independent Hearing Panel before it was confirmed.

Significant investment has been made by multiple landowners, including the submitters, based on a consistent, repeated, reinforced Council growth strategy reflected in these documents. To be blunt, such a stark departure from a long-standing Council policy severally shakes confidence in all of the Council's long term strategy and planning documents. Aucklanders, including business owners, developers and not for profits cannot be sure which of the strategies are here to stay and should be followed, and which are merely temporary (despite stating they are long term). This has huge implications for the future development of Auckland, which relies of private developers to meet housing demand.

In the case of Paerata , the FDS substantially defers that long standing Council commitment. This is done notwithstanding the significant investment in transport infrastructure upgrades to in part service this new population.

These aspects are clearly contrary to the Council's stated commitment to consultation and contrary to the requirements imposed on the Council under the Local Government Act for good faith consultation on policy changes of material significance. It also appears to be contrary to the requirement under the NPSUD that the Council engage with the development sector to "identify significant future development opportunities and infrastructure requirements" when preparing the draft FDS i.e. prior to the Special Consultative Process (Clause 3.15.2(f) of the NPSUD).

The FDS will set in place a 30-year growth strategy for the Auckland region. This proposed FDS involves a fundamental change from the long-established growth pattern that has been in existence since 2011. This major change to existing long-established policy is being done

with very limited public consultation prior to the proposal being published. Despite the Council's extension of the consultation timeframe, this process is of questionable legality as outlined in the attached opinion and certainly contrary to democratic processes of consultation.

16. Understanding the timeframes to get land development ready

In identifying the timing for land to be development ready, the Council needs to take a realistic understanding of the timeframes involved. Even on optimistic timeframes, it is a five year process between commencement of the work to create the employment opportunity, and business premises becoming operational and jobs created. Often this can extend out to closer to eight – ten years.

The process typically includes:

(a) Development consultation and adoption of a structure plan – 1 year. The five structure plans the Council have done each took on average 2 years .

(b) Taking this structure plan, preparing, notifying, processing, hearing and determining a plan change – 2 years. The Council plan change on Whenuapai, which was ultimately withdrawn, took 4 years and 8 months. The private plan change on Warkworth North took 2.5 years and on Drury took 2 years.

(c) Preparing, lodging and obtaining the necessary resource consents and engineering plan approval – 1 year.

(d) The physical land development works involving procurement, establishment, bulk earthworks, infrastructure, subdivision and titling; is typically an 18 month process, even for a relatively confined stage. That does then achieve development ready sites.

(e) The actual design, construction and commissioning of plants can be a further 18 month to 2 year process.

These are realistic, if slightly optimistic, timeframes. Very few projects would hit good timeframes at <u>every</u> stage.

The key point is that if the Council is to achieve the '*development ready*' timeframes it seeks, then the commencement of structure planning work and other aspects needs to start a minimum of five years prior and more likely eight years. This signals two issues:

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

The infrastructure cost when services are actually required will come at occupation of the business land. There is an inherent extended timeframe, i.e. a commitment to a certain area now does not equate to when the infrastructure rolls out. The operational demand for infrastructure is at least five years later.

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

17. **Changes to the Rural Urban Boundary (RUB) should remain a district plan level control (as opposed to a regional control as proposed within the FDS)**

(a) The suggestion that the RUB should be a *regional* rule and therefore only able to be modified effectively by the Council through a public plan change, is demonstrably a retrograde step.

(b) This approach was tested through the Auckland Unitary Plan process. That process found that a plan change to the RUB should remain a *district* matter and that it was inconsistent with the RMA to do otherwise:[1]

> *"While the desire of the Council to achieve planning certainty about growth over the next 30 years is understandable, the Panel does not consider that it promotes the purpose of sustainable management to lock in land supply and infrastructure decisions over such a long period when the environment and the needs of people are constantly changing. Resource management planning needs to be responsive to the dynamic processes of urban growth. While providing certainty can promote efficiency by reducing future process requirements, overly or unnecessarily rigid application of rules can be a hurdle or barrier to efficiency by creating additional costs.*
>
> *The Panel considers that methods aimed at sustainably providing for housing in an efficient manner should be designed to discourage undesirable behaviours, such as land banking, and encourage desirable outcomes, such as creating alternative and competitive development opportunities to meet the needs of people. A Rural Urban Boundary that is permanent for the next 30 years, subject only to the unilateral power of the Council (or a Minister) to move it, would not provide sufficient planning flexibility to adapt to changing circumstances. "*
>
> *"For these reasons the Panel recommends that the Rural Urban Boundary should remain as a method in the Unitary Plan but should be moved from the regional policy statement to the district plan. While the policy for its location should remain in the regional policy statement to maintain its strategic direction over a longer term, the location of the boundary itself should be able to be changed by a plan change at the district plan level, which can be the subject of an application by any person."*

(c) The reasons why the Council's suggestion of a regional rule were rejected in 2016, are equally valid today. No modification is justified. As noted by the Panel in its Recommendation Report to the Council on the Auckland Unitary Plan

(d) The Council's track record in implementing greenfields development through plan changes under the FULSS is very limited. The only public plan change that the Council promoted giving effect to the FULSS was Whenuapai. Even then, the Council ended up withdrawing that plan change. No public plan changes have been promoted that would

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

give effect to the current growth strategy. Every greenfields development has relied on a private sector initiative and a private plan change.

(e) Being able to deliver these critical plan changes to provide for growth, is essential. Since 2017, the Council has relied on the private sector to do this. In a time where the Council is signalling severe financial constraints, what confidence can the community or the sector have that the Council can and will deliver on these changes.

E. REQUESTED DECISION

18. The submitters request:

(a) the Council pause the current programme on the FDS;

(b) there be meaningful consultation with the community including the development sector;

(c) some key principles be agreed including:

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

(ii) this will continue the combination of urban consolidation, greenfields development, and the expansion of satellite townships;

(iii) growth needs to be serviced by adequate infrastructure;

(iv) that infrastructure can be supplied through a broad range of options including innovative methods and participation by the private sector (investment and development);

(v) stormwater and flood plain management are important factors and need to be considered in the release of land, but recognising different appropriate methods to manage such land.

(i) apply those principles on an area by area basis to identify the release of land;

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

(e) enable the private sector to deliver the range and quality of urban growth that is good for the community and which the NPSUD and RPS aspire to;

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

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

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

Future Development Plan 2023 #7265

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

Your feedback

Focusing growth

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

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

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

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

I don't know

Tell us why

Accessible local centres

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

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

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

I don't know

Tell us why

Avoiding hazards

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

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

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

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

I don't know

Tell us why

Resilient infrastructure

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

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

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

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

I don't know

Tell us why

Other feedback

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

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

#7265

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21 July 2023

Auckland Council
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Comments on Proposed Future Development Strategy

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

About us

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

Fulton Hogan undertakes numerous activities including:

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

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

Importance of aggregates to New Zealand

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

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

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

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

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

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

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

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

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

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

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

[1] Pages 9 and 10

Yours sincerely



Helen Caley
National Resource Consents Planner

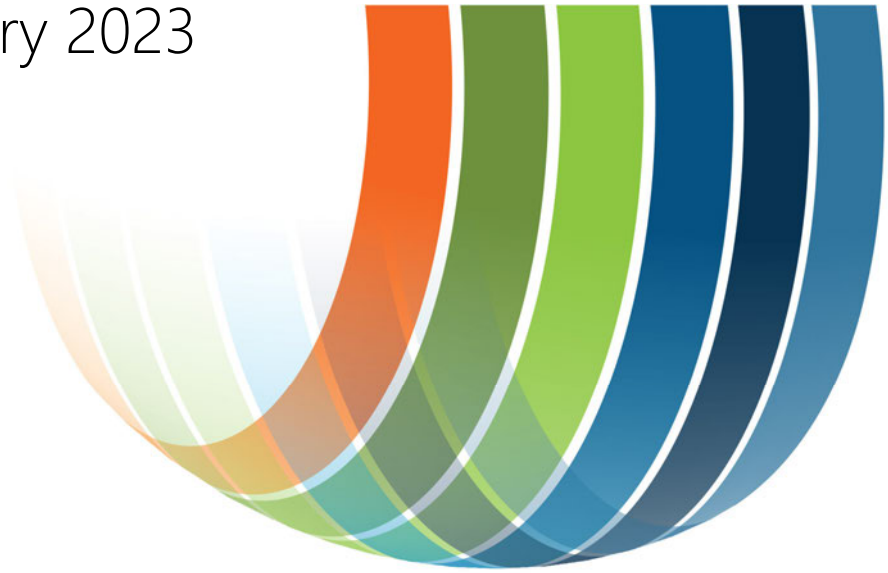
Attachments:
Examining aggregates trends in New Zealand

#7265

Examining aggregates trends in New Zealand

for Fulton Hogan

January 2023



Infometrics

Economics put simply

Authorship

This report has been prepared by Principal Economist Brad Olsen.

Email:

[redacted]

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Executive Summary

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

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

Examining aggregates volumes

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

Examining aggregates' contribution to building costs

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

Examining the cost of transporting aggregates

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

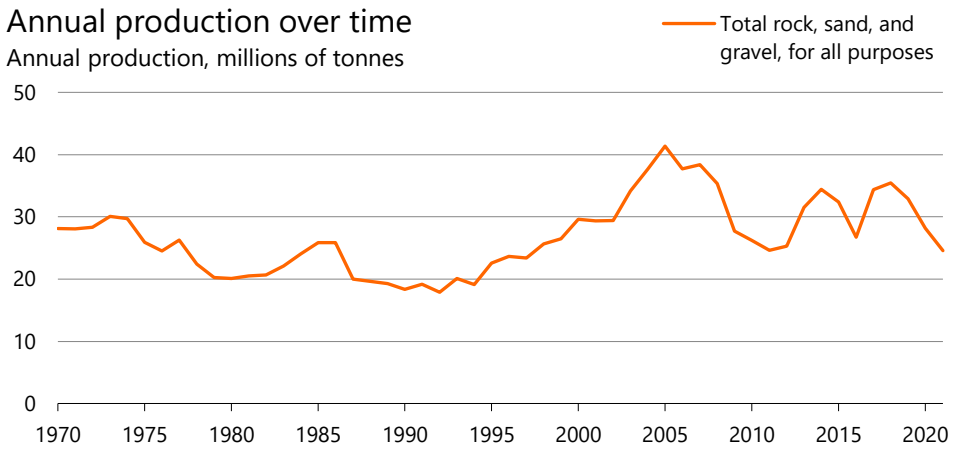
Examining aggregates volumes

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

Substantial and sustained aggregates needs

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

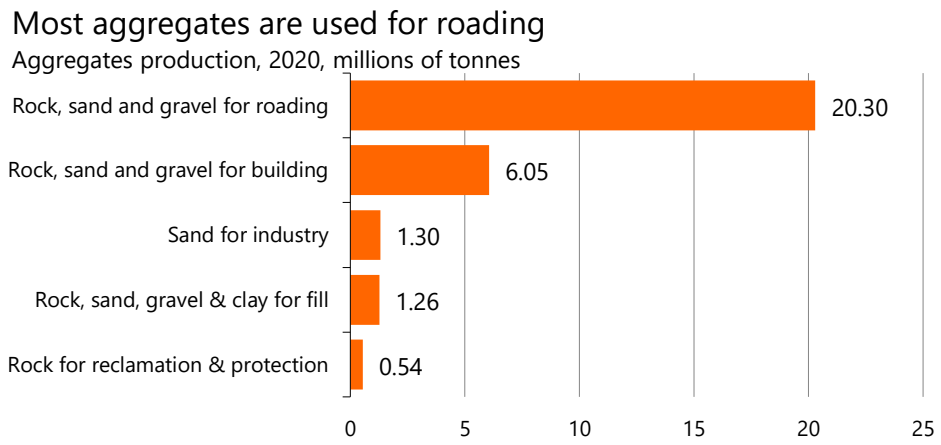
Graph 1



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

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

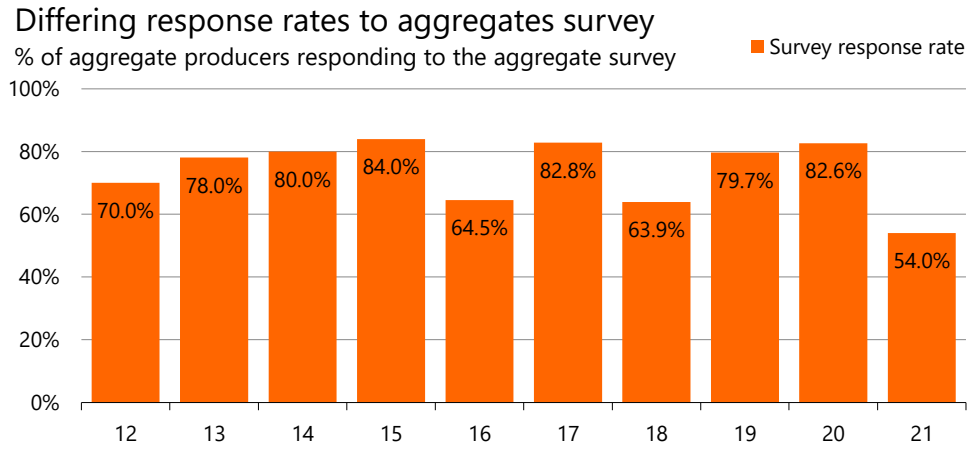
Graph 2



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

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

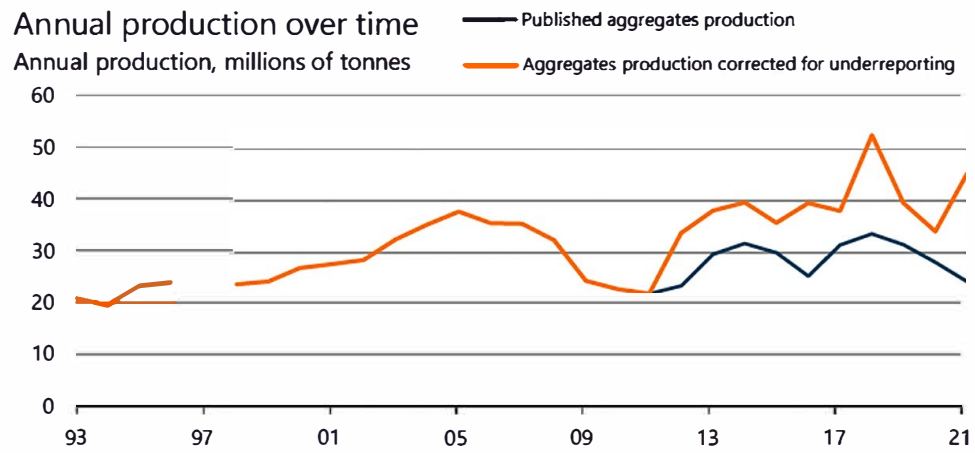
Graph 3



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

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

Graph 4



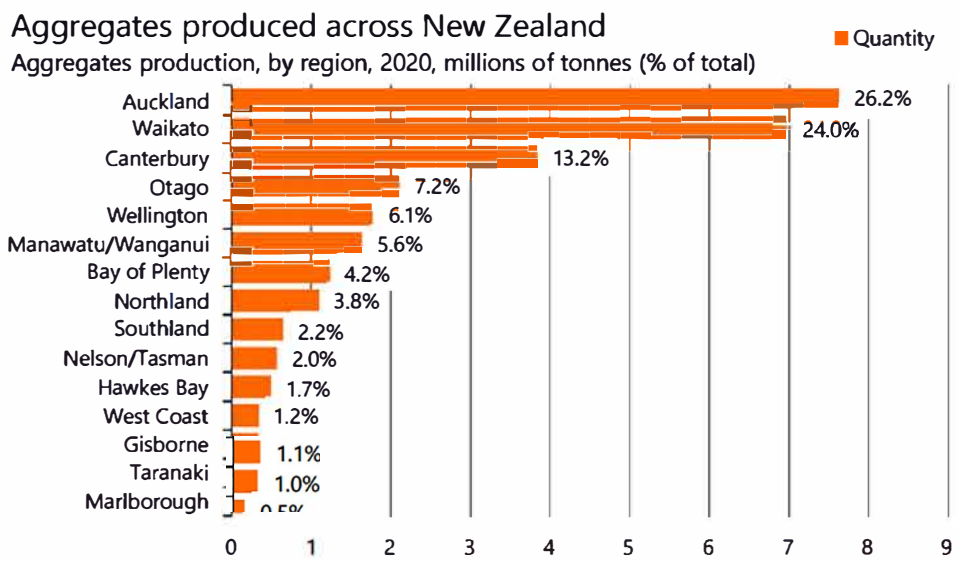
No data was produced in 1997.

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

Aggregates required across all of New Zealand

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

Graph 5



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

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

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

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

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

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

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

---

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

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

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

Examining aggregates' contribution to building costs

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

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

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

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

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

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

Table 1

Heavy and civil engineering construction, input costs

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

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

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

Aggregates also required for housing

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

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

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

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

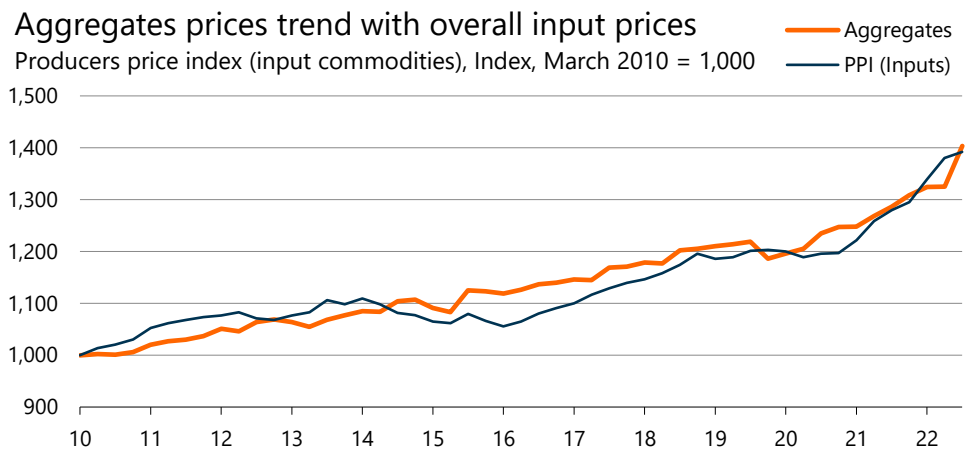
Aggregates have been getting more expensive

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

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

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

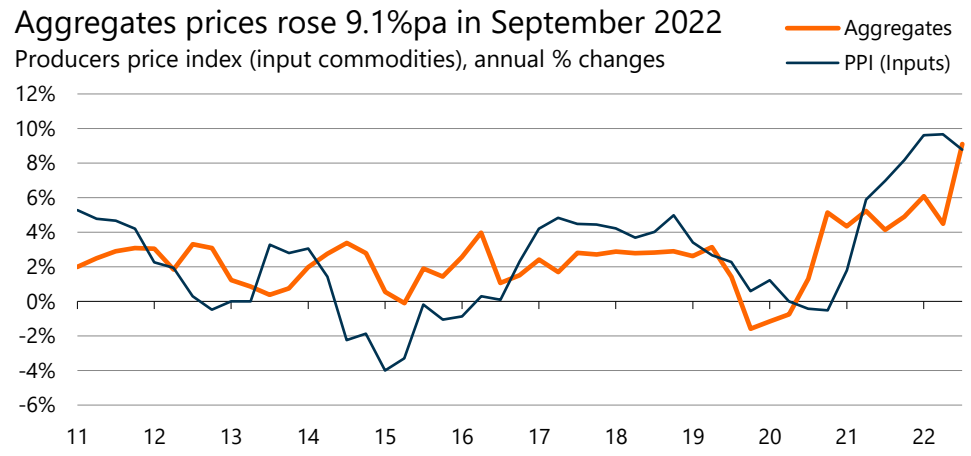
Graph 6



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

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

Graph 7



Examining the cost of transporting aggregates

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

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

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

Most aggregates moved by road

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

The 2014 National Freight Demand Study noted that aggregates are a

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

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

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

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

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

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

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

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

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

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

Graph 8

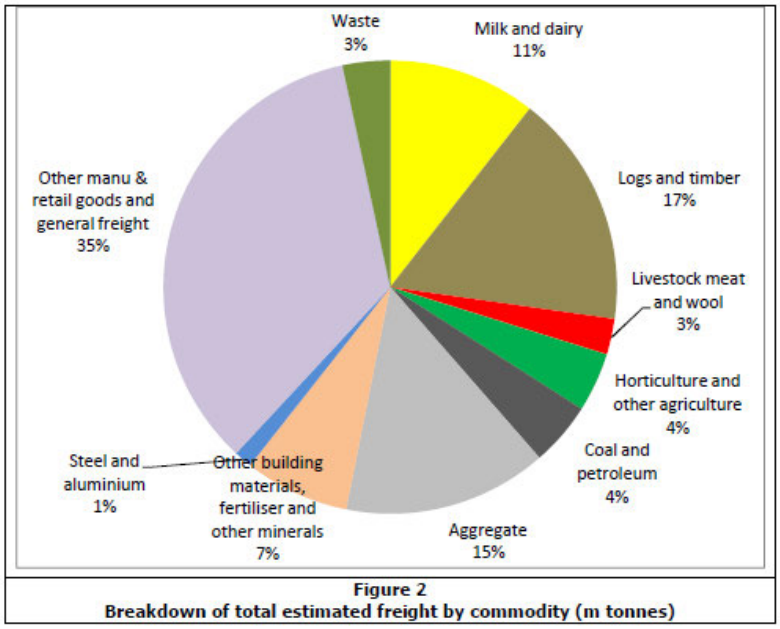


Figure 2
Breakdown of total estimated freight by commodity (m tonnes)

Source: National Freight Demand Study 2017/18

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

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

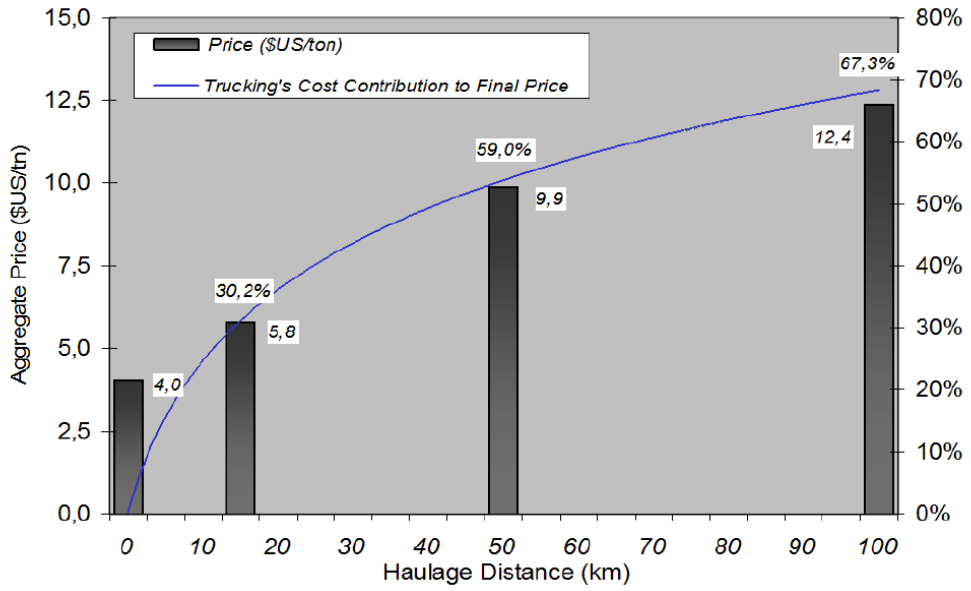
[12] Deloitte, Richard Paling Consulting, Murray King & Francis Small Consulting, and Cooper Associates. (2014). *National Freight Demand Study 2014*. Ministry of Transport. Retrieved from https://www.transport.govt.nz/assets/Uploads/Report/National-Freight-Demand-Study-Mar-2014.pdf (accessed 20 January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

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

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

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

Figure 1



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

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

Stylised scenario costs

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

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

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

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

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

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

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

Table 2

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

Scenario analysis

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

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

Inter-regional aggregates movement cost-prohibitive

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

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

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

[15] Richard Paling Consulting, IPC & Associates, John Bolland Consulting Ltd, Murray King & Francis Small, and Ascari Partners. (2008). *National Freight Demands Study 2008*. Ministry of Transport. Retrieved from https://www.transport.govt.nz/assets/Uploads/Report/FreightStudyComplete.pdf (accessed 20 January 2023).
[16] Deloitte, Richard Paling Consulting, Murray King & Francis Small Consulting, and Cooper Associates. (2014). *National Freight Demand Study 2014*. Ministry of Transport. Retrieved from https://www.transport.govt.nz/assets/Uploads/Report/National-Freight-Demand-Study-Mar-2014.pdf (accessed 20 January 2023).

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

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

Table 3

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

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

Source: National Freight Demand Study 2017/18

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

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

Future Development Plan 2023 #7266

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

I believe this is a very narrowly focused approach that negatively alters Aucklanders' choice in terms of housing style or location, to terraced housing and apartment living. The people of Auckland are not a one size fits all community. Given that some of the areas council are suggesting to rezone from Future Urban currently lay on the urban boundary, and close to several townships and public transport, such as Alfriston. Alfriston should in fact be a natural choice for urbanisation based on its location and ability to connect to current urban infrastructure.

Accessible local centres

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

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

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

Other

Tell us why

Alfriston has close access to Takanini and Manurewa. It is also very close to the motorway and public transport such as Trains and Bus Services. It currently serves as the major arterial to Manukau, Ormiston, East Tamaki and Botany. Based on this evidence and the need in South Auckland for the Mill Road development (which will be implemented when there is a change of Government) I would have to say that proposing that Alfriston be removed from the Future Urban Zoning is a bit hasty given that the current 30-year Unitary Plan has it designated to go LIVE in 2038-2047.

By leaving it within the zone of future urban the council will then have the flexibility for it to become LIVE Future Urban when and if it is needed, rather than having to redo a process every 6 years on a 30 year plan, which is costly for ratepayers, uses valuable council budget that could be used for infrastructure, and effects peoples livelihoods based on what they have invested into their properties.
The council is in fact setting a precedence that shows the land owners of Auckland, that a downgrade in zoning can happen at any time the council chooses, after spending ratepayers money, conducting investigations on the land, presenting and applying a 30 year Unitary plan, how on earth will anybody have the confidence to buy anything other than a terraced house in Auckland in the future?

Avoiding hazards

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

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

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

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

Other

Tell us why

I agree in theory, however, I believe this whole process is a knee-jerk reaction to the recent weather events that affected some areas, as well as a lack of infrastructure budget. I understand there was loss of life and my heart truly goes out to those affected. I am however glad to say that Alfriston was not affected by these weather events, and having lived here for 38 years and many seasons, am happy to say that we have never been flooded. Natural Weather events and disasters can strike anywhere at any time - a city's growth should not be decided upon based on what might happen when these events are in fact anomalies. Gosh, I could decide not to leave my house each day as I could be hit by a truck! This is probably more likely to happen as we have the hazard of 1000 truck movements a day in Alfriston, who are doing their job supporting the infrastructure to the rest of Auckland. Very Frustrating! We also suffer loss of life due to lack of infrastructure in

roading in this area and the toll on mental health because of the roading issues is also greatly tested. All of these hazards would be alleviated through funding for MIll Road.

From a ratepayers perspective, we do not receive any services from Council - the berms and drains are overgrown and unattended and the corner of Ranfurly and Alfriston Road is a mess. I literally have to contact the council on a weekly basis regarding the dumping on a layby in front of my house, which really does not need to be there, as it only serves for dumpers. After years of discussion about integrating rubbish collection into rates, we are still buying tags for our weekly bin collection.

The most frustrating misconception of all is that council recognizes Alfriston as Takanini, and throws our area into the peat pot. This is not the case. I agree that building houses on a Kauri Swamp -such as Addison, Kauri Flats area - is not a great idea and should never have happened. Our soil in Alfriston is solid, we do not flood, and let's face it, we already have a 3-stage development on Ranfurly Road of terrace houses and apartments of which the council passed in a private plan, and consented to the 3rd stage based on the assumption that waste and water services would be integrated into in the area within a 10 year period. The other factor that should be seriously taken into account is that Kianga Ora has also purchased 27 hectares within the Alfriston block which must also lead to Future Development based on the country's need for housing. I cannot envision that this will not happen before 2050, based on the lack of housing for our most vulnerable, and population growth in that area.

Resilient infrastructure

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

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

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

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

Other

Tell us why

Again I agree in theory, and when you develop an area such as Alfriston, as a council you would have the ability to ensure that these elements are included. It must be a lot more difficult to ensure intensification is resilient, which I believe was what created some of the hazards with recent weather events.

Other feedback

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

Finally from a long-term residents perspective, we are not just blocks of land, we are people with lives, who pay larger rates that serve the wider community, and we have families and expenses also (often larger expenses than residential owners).

From a personal perspective, you need to know that there are real live situations at play here for the people too. For instance, my unwell mother who is on Alfriston Road, next to our own property recently put her property on the market, after my father passed away 18mths ago. The council's FDS proposal became more public (note very few residents even knew about this until they were notified by Bayleys Real Estate) the day before her auction, which of course passed in due to the uncertainty this proposal has created for buyers. She has still not had a reasonable offer and it seems her property is now 1.5m less than what it is valued at. As this FDS is not a fast process, she is unlikely to be able to move on now and enjoy her final year(s), unless she gives the property away. This is heartbreaking after seeing them work to the bone for 38 years.

We also have other long-term residents who have sold but are awaiting settlements, which often with land are longer than residential settlements. It is likely that this news will affect those settlements and may completely break them.

Mr Newman mentioned in a meeting I attended in the Papakura Council rooms ..."Future Urban does not mean Future Urban unless it is LIVE", and that people who invested had been incorrectly directed by Real Estate agents to inflate the price they paid for Future Urban Land. I found this very confusing and I must say it is the first time since the unitary plan was launched in 2018, that I have heard it explained this way, particularly as the unitary plan has dates alongside the given areas that indicate when the urbanization process is likely to start.

From a Real Estate Agent perspective, I would like to offer some transparency to this situation. Real Estate agents are not land specialists, and should always direct a buyer to do their own due diligence with the council in terms of future development potential. If Mr Newmans statement is correct, then this should be transparent to a potential buyer when they speak to council. I am aware there are a number of land bankers and development owners in our area, however, these people are still NZ Rate Payers who have invested in their futures and probably have families to feed and support as well.

And in closing.... Why is it ok that these future urban owners should essentially foot the bill for weather events that did not affect our area and cannot be controlled? Why are we also footing the bill for infrastructure needs of wider Auckland, when there never seems to be an allocation in the council budget to our South Auckland area? Our forgotten South Auckland area is in dire need of infrastructure funding and road funding to mitigate the hazards that the council choose not to see in this area.

Future Development Plan 2023 #7380

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Have you gone full retard trying to make a more congested and busier and more denser City can you please listen to what the people want what the rate payers want and needs

Accessible local centres

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

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

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

Disagree

Tell us why

You have no common sense. Build the housing Which creates the congestion then you spend all the time fixing the roads and cutting it up which creates more problems please put the infrastructure in front of the new housing. Stop creating these rubbish little subdivisions with tiny roads that there is no parking offstreet parking which creates a congested road side and there

for only one person can drive down the road at a time little and try and pack a trailer boat out of your driveway

Avoiding hazards

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

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

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

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

Disagree

Tell us why
Please read the comments above

Resilient infrastructure

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

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

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

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

Disagree

Tell us why
Please read the comments above

Other feedback

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

Future Development Plan 2023 #7463

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why
Sevices won't cope

Accessible local centres

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

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

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

Disagree

Tell us why
People need space

Avoiding hazards

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

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

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

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

Agree

Tell us why
Common sense

Resilient infrastructure

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

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

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

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

Agree

Tell us why
Only, we need to realise that climate change is a natural cycle that has occurred repeatedly over the centuries.

Other feedback

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

Don't be afraid of spreading out, but do as London did and have a fully functional and efficient public transport system to support the growth. Plan this FIRST. I remember some 24 years ago when Sydney offered to build a harbour tunnel for Auckland after they finished their Sydney one. The only proviso was a toll would apply for a finite period. Auckland turned it down. Please don't continue making such dumb decisions!

Future Development Plan 2023 #7478

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Are you going to discriminate urban area and rural area about development plan? Does Auckland Council do not care for people in rural area?

Who suggested such STUPID and RIDICULUOUS idea?

There were 'existing development plan' for my living area in 2011. The plan did not proceed well. It is already delayed enough.
And what? 30 years? Are you mad? How old are you? "Your land will be developed after 30 years". GO TO HELL.

Accessible local centres

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

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

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

Disagree

Tell us why
All regions have equal rights to develop. People do not tolerate discrimination of any kind.

Avoiding hazards

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

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

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

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

Agree

Tell us why

Resilient infrastructure

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

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

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

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

Disagree

Tell us why

I doubt the council just say FANCY words to the public.
What is exactly meaning for "decentralised, nature-based, regenerative and mauri-enhancing"?
Too much ambiguous words.

Other feedback

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

Do not make a new plan. SIMPLY COMPLETE EXISTING PLAN. ACT and TRY NOT CHANGE IT.

Future Development Plan 2023 #7539

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

This submission was prepared by Hiltrud Grüger (spokesperson). I hold an MSc in Geography that included cartography.

Springleigh RA opposes FDS in its' entirety.

1. Focusing Growth

Introduction:

SRA opposes the question on 'Focusing Growth' for the following reasons, but not limited to:

1.1 Re-litigation of Auckland Unitary Plan (AUPOIP)

- FDS re-litigates the AUPOIP, RMA91, proposed environmental legislation such as Natural and Build Environment Bill, Water Services Entities Bill. Springleigh RA has been a submitter on the two bills and AUPOIP.

- FDS does not comply with central government legislation: RMA91, LGA and proposed environmental legislation

- the extent of plan changes required to AUPOIP as a result of FDS is major. Cumulative, the plan changes constitute re-litigation of AUPOIP. FDS consultation does not fairly represent the extent of required plan changes.

- AUPOIP already sets out the nature of urban growth in Auckland with zoning for 'Open Space', 'Infrastructure', 'Residential', towncentres and business zoning etc. The need to re-litigate AUPOIP has not been demonstrated by FDS evidence report.

- FDS evidence report does not address the negative environmental and social effects of FDS

- Department of Conservation has not addressed the effects of FDS on the 'Pollen Island Marine Reserve'

Request: - legislation relevant to FDS and the extent of re-litigation must be notified to ensure consultation under the LGA,

- the cumulative effects of plan changes and the full range of affected zones of AUPOIP must be notified

- FDS evidence report must assess FDS fully as per LGA, all evidence must be notified

1.2 FDS evidence report is based mainly on anecdotal assumptions.

- FDS is largely anecdotal, lacks clear definitions of terms, especially where they are contrary to AUPOIP and RMA91, evidence does not address environmental and social effects

- 'Quality of Design' for private development is anecdotal, and cannot be enforced through existing or proposed environmental legislation, or LGA

- 'Aligning growth with infrastructure provision' is anecdotal and means in the context of FDS that public 'Open Space' is used for private development, ratepayers are required to finance 'infrastructure provisions' for private developments. This is contrary to the Local Government Act

- 'focus on aligning land use and infrastructure' is anecdotal and cannot be enforced. They are part of AUPOIP which must not be re-litigated by FDS.

Request: - FDS evidence report and consultation must include an Assessment of Environmental Effects, a Social Impact Statement to be understood for LGA purposes and proceedings

- FDS evidence report is not sufficient to inform future AUPOIP plan changes and AC policies

1.3 Re-litigation of Te Auaunga/Oakley Creek, surrounding 'Open Space', and Wairaka Precinct

- The affected areas of TeAuaunga/Oakley Creek and surrounding 'Open Space', and the Wairaka Precinct have been part of substantial RMA91 proceedings that had raised major public interest. SH20 Waterview connection was a matter of national significance, the first call-in under RMA and a substantial environment court case at which Springleigh RA had been a submitter attending a substantial hearings process, mediation etc.

- FDS must not re-litigate or rezone the 'Ecological Significant Area Te Auaunga/Oakley Creek' and must not re-litigate the Environment Court decision on SH20 Waterview connection, as well as other relevant decisions

- FDS must not re-litigate or rezone the Wairaka Precinct. FDS does not make changes to infrastructure on the Wairaka Precinct. Zoning of the Wairaka Precinct as part of the Unitary Plan was the result of evidence exchange, a mediation process, directions by the hearings panel and a hearing with recommendation. Springleigh RA submitted substantial evidence regarding housing densities, stormwater, ecological effects on the Oakley Creek, social effects etc. Changes to the Wairaka Precinct must be made through a notified plan change or resource consent.

Request: - An Assessment of Environmental Effects and Social Impact Assessment on Te Auaunga/ Oakley Creek and its' surrounding 'Open Space' in several suburbs as well as the Wairaka Precinct must be included in FDS evidence report and FDS consultation draft.

- FDS must not re-litigate or re-zone relevant decisions and zoning relating to Te Auaunga/Oakley Creek and Wairaka Precinct

Accessible local centres

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

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

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

Disagree

Tell us why

2. Accessible local centres

Springleigh RA opposes the question on 'accessible local centres' for the following reasons, but not limited to:

- the wording of this question is vague and anecdotal, FDS consultation draft and evidence report are vague

- local centres must be defined as it is misleading, 'local centres' is a term not encountered in RMA91 proceedings and are not part of AUPOIP,

- the question and related information in the Consultation Draft cannot be enforced by existing environmental legislation or LGA,

- for example, FDS cannot enforce that private developers provide housing near local centres (whatever this term means) or directly influence the housing choices that residents make

- the same applies to businesses that are pre-dominantly privately owned, and chose their location depending on many factors, not only 'spatial' considerations, some businesses are in overseas ownership,

- transport is a matter of Auckland Transport, a CCO and not the AC

- transport evidence is anecdotal, as working and shopping habits have changed since COVID19 lockdowns, it is common to work several days per week from home and to shop more on the Internet. For example, there is visibly less traffic surrounding the St Lukes shopping centre in Mt Albert, the business activities proposed by AUPOIP for Morningside Dr are not happening.

2.1 Thematic maps as misleading evidence in FDS evidence report and FDS consultation draft

- Springleigh RA has reasons to assume that AC is not disclosing all its' evidence,

- evidence for large-scale housing re-zoning, transport issues, business, 'local centres' is provided as a series of thematic maps. Occasionally, an attempt at sequential numbering is made. Numbering differs between documents.

-There is no indication in the FDS evidence report and FDS consultation draft to what principle or key issue the maps relate to.

- the maps are of a scale that it is almost impossible to identify specific locations (and I have studied Geography)

- the maps include a bare minimum of geographical names making it difficult to find locations

- there is no map that shows existing AUPOIP zoning and the corresponding re-zoning proposed by FDS

Request: - maps included in FDS consultation draft are insufficient for public consultation

- public consultation under LGA must be a fair representation of FDS

2.2 Rosebank Rd surroundings rezoning and missing evidence

- Springleigh RA has reasons to assume that AC is not disclosing all its' evidence regarding Rosebank Rd surroundings as part of this consultation, it indicates that the plan change surrounding Rosebank Rd is in an advanced stage,

- FDS does not disclose the private developers and their proposals for the surroundings of Rosebank RD, FDS does not provide the necessary assessments required for a AUPOIP plan change

- consultation draft proposes that people who work on Rosebank Rd must live in Avondale, this is not enforceable. For financial, personal, life-style reasons people make varied choices.

- Change of Unitary Plan zoning surrounding Rosebank Peninsula relies on anecdotal assumptions in FDS.

- FDS evidence report and consultation draft do not identify the people affected, the vague thematic map does not enable to establish the extent of re-zoning proposed for the surroundings of Rosebank RD

- an assessment is lacking regarding where schools, health and emergency services, community facilities etc are located surrounding Rosebank Rd, as well as an AEE.

Request: - under LGA consultation must provide full evidence for the proposed rezoning of Rosebank Rd surroundings

- AC must provide and notify documents and AEE required for a plan change in the surroundings of Rosebank RD

2.3 Auckland Council not capable of making a decision on FDS

- the second question in the Feedback Form of FDS raises concerns about the state of the Auckland Council and its' ability to make a decision on FDS.

- FDS is confused about the responsibilities of AC, e.g. but not limited to: it directs DOC, Auckland Transport, as well as private business

- the Auckland Council and its' individual councilors, mayor and deputy mayor must have fully understood AUPOIP and be able to explain FDS, including what 'local centres' are, what the maps provided as evidence mean in the RMA91 context and the required Plan change proceedings,

- Auckland Council understands that not all evidence is provided in documents of the FDS statutory process and as part of the consultation

- Auckland Council understands that not all residents comprehend the evidence provided in FDS evidence report and consultation draft

- the consultation draft is not transparent as to how many workshops and meetings AC has attended regarding FDS

Request:

- AC councilors, mayor and deputy mayor must attend workshops and meetings that explain AUPOIP and FDS before the decision on FDS

- AC councilor, mayor and deputy mayor must attend workshops and meetings regarding issues raised during consultation before the decision on FDS

Avoiding hazards

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

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

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

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

Disagree

Tell us why

'3. Avoiding hazards

Springleigh RA opposes the question for the following reasons, but not limited to:

3.1 Question is misleading and does not represent key issues of FDS

- the key issue of 'avoiding hazards' is not fairly represented in the FDS consultation draft as well as the feedback form which is contrary to LGA.

- FDS does not actually include an approach to environmental risk management. It states that it cannot assess hazards in 4.26. of FDS consultation draft.

- FDS refers to natural hazard in 2.4.4. (p11) of consultation draft. It clearly states that Auckland Council does not propose 'infrastructure' as defined by RMA91 and proposed environmental legislation in areas at risk from natural hazards. Instead, it uses vague and plagiarized terms not defined in FDS or environmental legislation and LGA.

Request: - FDS consultation must represent the key issue of 'avoiding hazards' in a manner relevant to the proposed statutory processes

3.2 Feedback form question and FDS consultation are a case of bad plagiarism

-FDS consultation draft and related feedback from question are contrary to the statutory process of FDS proceedings and do not fulfil the requirements of LGA in the section 'avoiding hazards'

- Questions in the feedback form itself are not labeled but we assume that it is the 'third question',

- FDS consultation draft identifies coastal inundation, erosion/slips, flooding, coastal erosion in a figure that is not properly labelled, e.g., has no number, and no proper title. The figure does not include a reference. It is obviously copied from somewhere in a bad case of plagiarism and not permissible in the statutory process and in consultation.

- anecdotal wording, e.g., but not limited to, 'areas …. to be looked at' does not identify an activity under RMA91, 'appropriate actions' are not defined by FDS or RMA91,

- 'adapt' is not defined and can apply to private as well as public property according to the consultation draft, 'adaptation' is used randomly in flow charts in the consultation document. On several occasions 'adapt' and 'adaptation' implies that ratepayers finance private development and private land-owners which is contrary to LGA

- FDS feedback form is different from previous feedback forms, especially but not limited to, the plan that it is replacing

Request: - FDS feedback form does not fulfil the requirements for consultation under LGA

- relevant consultation supported by evidence must be undertaken

3.3 Auckland Council ability to govern

- the 'third question' and relating documents raise doubts about Auckland Council's ability to govern in accordance with the LGA

- Auckland Council understands the feedback form and FDS consultation draft and evidence report in relation to, but not limited to, 'Avoiding hazards'

- it is not transparent from FDS consultation draft whether Auckland Council, including councilors, mayor and deputy mayor have attended workshops and meetings regarding ‘avoiding hazards’, how many members have attended workshops and meetings, and how many members have attended for the full length of meetings and workshops

Request: - the ‘third question’ or section ‘avoiding hazards’ must be removed from FDS feedback form

- a new question, fairly representing ‘avoiding hazards’ and supported by an evidence report is to be inserted into the feedback form

- Auckland Council understands ‘avoiding hazards’, as required by LGA

Resilient infrastructure

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

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

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

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

Disagree

Tell us why

'4. Resilient infrastructure

Springleigh RA opposes the ‘infrastructure’ proposal of FDS for the following reasons, but not limited to:

4.1 ‘Resilient infrastructure’ constitutes misleading consultation under LGA

- the ‘fourth question/survey’ of the feedback form is not a fair representation of FDS under LGA

- ‘infrastructure’ is used in a misleading manner in a statutory document

- feedback form and consultation draft imply that ‘infrastructure’ will be undertaken in the form of infrastructure projects which is false and misleading

- ‘infrastructure’ is defined in p1s2 of the RMA91 and relates to s30 of RMA91, as well as proposed environmental legislation, as well as by Unitary Plan provisions. FDS re-litigates these even in the case of Central Government Legislation.

- Principle 2(b) states that infrastructure, as commonly defined by existing and proposed environmental legislation and Unitary Plan, will not be constructed for economic reasons. The

effects of not building not building ‘infrastructure’ are not addressed by FDS evidence report, consultation draft and feedback form. The consequences can be catastrophic as Cyclone Gabrielle has proven. The environmental and social effects are not addressed by FDS evidence report, consultation draft, feedback form.

- ‘infrastructure investment’ is randomly used by FDS. It is not clear whether it applies to public or private development, and whether it relates to existing legislation

- In addition, ‘rivers, streams, lakes, wetlands, coastal environments, water, water body, environment, amenity’, among others, are defined in p 1 of RMA91. Some of these are matters of national importance in s6(a) of RMA91. They apply to FDS.

- ‘Infrastructure will be viewed as a system …’ is a meaningless paragraph (p18) in terms of existing and proposed environmental legislation and LGA. The paragraph seems to suggest a ‘do-nothing’ approach to infrastructure.

-p. 22, the unlabeled and unnumbered figure needs adequate technical explanations and must state relevant existing and proposed environmental legislation considerations, AUPOIP and LGA requirements.

- FDS believes that ‘swales’, ‘raingardens’, among others, are permitted in ‘parks’. However, according to AUPOIP, Auckland does not have ‘parks’ instead it has got ‘Open Space’ zoning that clearly states the purpose of ‘Open Space’. ‘Road Reserve’ is included in ‘Open Space’ provisions of AUPIOP, in FDS it is separate.

- the use of public ‘Open Space’ for private development is not sufficiently supported. An unlabeled, unnumbered figure is inadequate. The figure is highly unprofessional but appears to illustrate a ‘key issue’.

Request: - the question on ‘Resilient Infrastructure’ to be deleted because both FDS consultation draft and FDS feedback form are misleading and do not fulfil legal requirements

4.2 ‘Resilient Infrastructure’ in FDS a bad example of plagiarism

- ‘nature-based’, ‘regenerative’, ‘green infrastructure’, ‘green area’, ‘swampland’, ‘watercourses’, ‘forest’, ‘bush’, ‘riparian yard’, ‘natural infrastructure’, ‘physical infrastructure’, ‘soft and hard infrastructure’, ‘soft’ approaches’, ‘hard and soft infrastructure investment’, ‘incentivising’ are not defined by FDS and do not relate to existing and proposed environmental legislation instead they reveal a bad plagiarism job. They were obviously obtained from documents not disclosed or referenced by FDS. Their meaning is not clear and does not fulfil the requirements for AUPOIP Plan Changes.

- ‘incentivising’ is outside of LGA, not defined by FDS

- the random use of terms raises questions about the capability of AC including individual councilors, mayor, deputy mayor to govern, e.g., but not limited to, they must be able to explain what all those terms mean in the statutory context

Request: - FDS evidence report, draft consultation document, feedback must be a fair representation of the key issue of ‘resilient infrastructure’

4.3 Re-litigation of ‘Open Space’ of AUPOIP

- FDS constitutes the large-scale re-litigation of ‘Open Space’ provisions as well as SIE, coastal environments, rivers and their margins among other AUPOIP matters. They were a lengthy matter of the independent Unitary Plan proceedings at which Springleigh RA was a submitter and further submitter

-this key issue is not fairly represented in the consultation draft; the feedback form does not provide a survey/question on this issue.

- ‘parks’ are not defined in FDS

- FDS does not provide reasons for a re-zoning of ‘Open Space’ backed by an evidence report

- FDS proposes to rezone ‘Open Space’ for private development in the unnumbered and unlabeled figure on p22 which is outside of LGA provisions

- ‘Open Space’ among other AUPOIP matters along TeAuaunga/Oakley Creek and Pollen Island Marine Reserve is affected

Request: - rezoning of the entire ‘Open Space’ provisions of AUPOIP is not supported by FDS

4.4 Page 22, Water sensitive design (unnumbered and unlabeled figure) considerations

- Springleigh RA is disappointed by the unprofessionalism frequently revealed in FDS but particularly about the one revealed on p.22.

- the FDS feedback form states that the unlabeled, unnumbered, unreferenced figure on p.22 addresses a key issue of the FDS consultation draft

- p. 22 seems to be a design guide for private developments,

-p. 22 proposes that wastewater is discharged into ‘Open Space’ as well as rivers and river margins without addressing the environmental and social effects, among a host of RMA91 requirements

- FDS appears to be a re-litigation attempt of Stormwater Network Discharge Consent where Springleigh RA was a submitter,

-p. 22 gives consent to stormwater works, that are not properly notified and are not provided with an Assessment of Environmental Effects

-p. 22 classifies ‘Open Space’ as ‘Infrastructure’ without providing supporting evidence as required under RMA91

- p. 22 raises questions on how familiar Auckland Council, in particular individual councilors, mayor and deputy mayor, are with relevant environmental and local government legislation

4.5 Effects on Te Auaunga/Oakley Creek, Pollen Island Marine Reserve

- Springleigh RA opposes FDS because it has major negative effects on rivers, marine reserve, coastal environment and ‘Open Space’

Te Auaunga/Oakley Creek

- in particular, but not limited to, it proposes to discharge wastewater (p.22) in TeAuaunga/Oakley Creek and Pollen Island Marine Reserve. TeAuaunga/Oakley Creek is a ‘Ecological Significant Area’ of AUPOIP. Pollen Island Marine Reserve is a national park under central government legislation.

- the environment court decision on SH20 Waterview connection is re-litigated where it affects, but not limited to, Te Auaunga, 'Open Space', Sports fields, wetlands as a matter of national significance under RMA91,

- proposed 'detention basins' take up valuable 'Open Space' in open spaces surrounding Oakley Creek such as Walmsley and Underwood Park in low-income communities. The social and environmental effects of this are not addressed.

Walmsley Park/Mt Roskill

- presently, 'infrastructure' yards occupy an ever-increasing part of Walmsley Park, opposite the Wesley Community Centre, yards occupy areas that are subject to a resource consent which required them to be planted and open to the public. Contractors use the community centre parking lot, often with the engines of their vehicles running for extended periods. Overall, the environmental and social effects due to the loss of 'Open Space', years of disruption of community life, economic effects on the Wesley community market are major.

Pollen Island

- Pollen Island Marine Reserve requires that the Department of Conservations is notified and provided with relevant Assessments of Environmental Effects

Request: - the 'fourth question/survey' be removed from the consultation and feedback form

- sections relating to the 'fourth question/survey' be removed from FDS evidence report and consultation draft

- 'infrastructure' in FDS is assessed in the form of AEE, that fully informs about environmental effects

- consultation on 'infrastructure' as a key issue is conducted through fair representation as required by LGA

Other feedback

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

Other feedback

1. Springleigh RA opposes FDS in its' entirety. Any plan changes to AUPOIP must be publicly notified and ensure proper proceedings.

2. Springleigh RA was a submitter on AUPOIP and supports the existing AUPOIP in relation to FDS

3. Auckland Council fails to provide a fair representation of relevant issues in its executive summary.

For example, but not limited to:

-neither the executive summary nor the FDS consultation draft provide a fair representation of the extent of plan changes to AUPOIP required.

- FDS plan changes affect every chapter of AUPOIP, for example, but not limited to, Chapter E, F, H, are major

- FDS plan changes are major and constitute re-litigation of AUPOIP

4. Neither the executive summary nor the FDS consultation draft provide a fair representation of the costs that ratepayers incur.

5. FDS evidence report and consultation draft differ from similar reports required in similar statutory processes such as, but not limited to, Auckland 2050

6. FDS feedback form is different from feedback forms in several, similar consultation processes that Springleigh RA has participated in on several occasions over many years/decades.

7. FDS consultation is chaotic for a standard statutory process, e.g., needed the extension of consultation duration, additional library consultation etc.

8. FDS does not reveal the payments that AC is required to make for private development.

9. FDS consultation document and feedback form do not provide a fair representation of key issues because major evidence is left out.

10. FDS consultation draft is unprofessional and contains plagiarism

11. The feedback form is not a fair representation of FDS consultation draft.

- it contains four surveys or questions while FDS consists of five principles.

- feedback form does not clarify that FDS is about 'rezoning', 're-litigation'

- wording of the survey questions does not match to sections or principle in FDS consultation draft

- a survey on whether residents approve or disagree with proposed Plan Changes to AUPOIP is not included,

12. FDS consultation draft raises the question whether Auckland Council, such as individual councilors, mayor and deputy mayor are competent and are fulfilling their duty under LGA. FDS requires substantial knowledge of present and proposed environmental legislation, as well as AUPOIP proceedings and content.

13. FDS re-litigates Springhleigh RA's submission on Stormwater Network Discharge Consent, our further submission on the Wairaka Precinct, our submission on AUPOIP, our submission on SH20 Waterview connection, among a host of submissions that Springleigh RA has submitted relevant to FDS.

14. Attached is a document that combines our feedback comments in one document, and that we understand is part of a statutory process.

[redacted]

c/- [redacted]

[redacted]

[redacted]

This submission was prepared by [redacted] (spokesperson). I hold an MSc in Geography that included cartography.

[redacted] opposes FDS in its' entirety.

1. Focusing Growth

Introduction:

SRA opposes the question on 'Focusing Growth' for the following reasons, but not limited to:

***1.1 Re-litigation of Auckland Unitary Plan* (AUPOIP)**

- *FDS* re-litigates the AUPOIP, *RMA91,* proposed environmental legislation such as ***N****atural and Build Environment Bill*, *Water Services Entities Bill*. Springleigh RA has been a submitter on the two bills and AUPOIP.

- *FDS* does not comply with central government legislation: R*MA91*, *LGA* and proposed environmental legislation

- the extent of plan changes required to AUPOIP as a result of *FDS* is major. Cumulative, the plan changes constitute re-litigation of AUPOIP. *FDS* consultation does not fairly represent the extent of required plan changes.

- AUPOIP already sets out the nature of urban growth in Auckland with zoning for 'Open Space', 'Infrastructure', 'Residential', towncentres and business zoning etc. The need to re-litigate AUPOIP has not been demonstrated by *FDS evidence report*.

- *FDS evidence report* does not address the negative environmental and social effects of *FDS*

- *Department of Conservation* has not addressed the effects of *FDS* on the 'Pollen Island Marine Reserve'

Request: - legislation relevant to *FDS* and the extent of re-litigation must be notified to ensure consultation under the LGA,

- the cumulative effects of plan changes and the full range of affected zones of AUPOIP must be notified

- *FDS evidence report must assess FDS* fully as per LGA, all evidence must be notified

1.2 FDS evidence report is based mainly on anecdotal assumptions.

- FDS is largely anecdotal, lacks clear definitions of terms, especially where they are contrary to AUPOIP and *RMA91,* evidence does not address environmental and social effects

- 'Quality of Design' for private development is anecdotal, and cannot be enforced through existing or proposed environmental legislation, or *LGA*

- 'Aligning growth with infrastructure provision' is anecdotal and means in the context of *FDS* that public 'Open Space' is used for private development, ratepayers are required to finance 'infrastructure provisions' for private developments. This is contrary to the *Local Government Act*

- 'focus on aligning land use and infrastructure' is anecdotal and cannot be enforced. They are part of AUPOIP which must not be re-litigated by *FDS*.

Request: - *FDS evidence report* and consultation must include an Assessment of Environmental Effects, a Social Impact Statement to be understood for LGA purposes and proceedings

- *FDS evidence report* is not sufficient to inform future AUPOIP plan changes and AC policies

1.3 Re-litigation of Te Auaunga/Oakley Creek, surrounding 'Open Space', and Wairaka Precinct

- The affected areas of TeAuaunga/Oakley Creek and surrounding 'Open Space', and the Wairaka Precinct have been part of substantial *RMA91 proceedings* that had raised major public interest. *SH20 Waterview connection* was a matter of national significance, the first call-in under *RMA* and a substantial environment court case at which Springleigh RA had been a submitter attending a substantial hearings process, mediation etc.

- *FDS* must not re-litigate or rezone the 'Ecological Significant Area Te Auaunga/Oakley Creek' and must not re-litigate the Environment Court decision on *SH20 Waterview connection*, as well as other relevant decisions

- FDS must not re-litigate or rezone the *Wairaka Precinct.* FDS does not make changes to infrastructure on the *Wairaka Precinct.* Zoning of the Wairaka Precinct as part of the *Unitary Plan* was the result of evidence exchange, a mediation process, directions by the hearings panel and a hearing with recommendation. Springleigh RA submitted substantial evidence regarding housing densities, stormwater, ecological effects on the Oakley Creek, social effects etc. Changes to the *Wairaka Precinct* must be made through a notified plan change or resource consent.

Request: - An Assessment of Environmental Effects and Social Impact Assessment on Te Auaunga/ Oakley Creek and its' surrounding 'Open Space' in several suburbs as well as the Wairaka Precinct must be included in *FDS evidence report* and *FDS consultation draft.*

- FDS must not re-litigate or re-zone relevant decisions and zoning relating to Te Auaunga/Oakley Creek and Wairaka Precinct

[redacted]

c/- [redacted]

[redacted]

[redacted]

2. Accessible local centres

Springleigh RA opposes the question on 'accessible local centres' for the following reasons, but not limited to:

- the wording of this question is vague and anecdotal, *FDS consultation draft and evidence report are* vague

- local centres must be defined as it is misleading, 'local centres' is a term not encountered in *RMA91 proceedings* and are not part of AUPOIP,

- the question and related information in the Consultation Draft cannot be enforced by existing environmental legislation or *LGA*,

- for example, *FDS* cannot enforce that private developers provide housing near local centres (whatever this term means) or directly influence the housing choices that residents make

- the same applies to businesses that are pre-dominantly privately owned, and chose their location depending on many factors, not only 'spatial' considerations, some businesses are in overseas ownership,

- transport is a matter of Auckland Transport, a CCO and not the AC

- transport evidence is anecdotal, as working and shopping habits have changed since COVID19 lockdowns, it is common to work several days per week from home and to shop more on the Internet. For example, there is visibly less traffic surrounding the St Lukes shopping centre in Mt Albert, the business activities proposed by AUPOIP for Morningside Dr are not happening.

2.1 Thematic maps as misleading evidence in FDS evidence report and FDS consultation draft

- Springleigh RA has reasons to assume that AC is not disclosing all its' evidence,

- evidence for large-scale housing re-zoning, transport issues, business, 'local centres' is provided as a series of thematic maps. Occasionally, an attempt at sequential numbering is made. Numbering differs between documents.

-There is no indication in the *FDS evidence report* and *FDS consultation draft* to what principle or key issue the maps relate to.

- the maps are of a scale that it is almost impossible to identify specific locations (and I have studied Geography)

- the maps include a bare minimum of geographical names making it difficult to find locations

- there is no map that shows existing AUPOIP zoning and the corresponding re-zoning proposed by *FDS*

Request: - maps included in *FDS consultation draft* are insufficient for public consultation

- public consultation under *LGA* must be a fair representation of *FDS*

2.2 Rosebank Rd surroundings rezoning and missing evidence

- Springleigh RA has reasons to assume that AC is not disclosing all its' evidence regarding Rosebank Rd surroundings as part of this consultation, it indicates that the plan change surrounding Rosebank Rd is in an advanced stage,

- *FDS* does not disclose the private developers and their proposals for the surroundings of Rosebank RD, *FDS* does not provide the necessary assessments required for a AUPOIP plan change

- consultation draft proposes that people who work on Rosebank Rd must live in Avondale, this is not enforceable. For financial, personal, life-style reasons people make varied choices.

- Change of *Unitary Plan* zoning surrounding Rosebank Peninsula relies on anecdotal assumptions in *FDS*.

- *FDS evidence report and consultation draft* do not identify the people affected, the vague thematic map does not enable to establish the extent of re-zoning proposed for the surroundings of Rosebank RD

- an assessment is lacking regarding where schools, health and emergency services, community facilities etc are located surrounding Rosebank Rd, as well as an AEE.

Request: - under *LGA* consultation **must provide full evidence for the proposed rezoning of Rosebank Rd surroundings**

- AC must provide and notify documents and AEE required for a plan change in the surroundings of Rosebank RD

2.3 Auckland Council not capable of making a decision on FDS

- the second question in the Feedback Form of FDS raises concerns about the state of the Auckland Council and its' ability to make a decision on FDS.

- *FDS* is confused about the responsibilities of AC, e.g. but not limited to: it directs *DOC, Auckland Transport,* as well as private business

- the Auckland Council and its' individual councilors, mayor and deputy mayor must have fully understood AUPOIP and be able to explain FDS, including what 'local centres' are, what the maps provided as evidence mean in the *RMA91* context and the required Plan change proceedings,

- Auckland Council understands that not all evidence is provided in documents of the *FDS* statutory process and as part of the consultation

- Auckland Council understands that not all residents comprehend the evidence provided in *FDS evidence report and consultation draft*

- the *consultation draft* is not transparent as to how many workshops and meetings AC has attended regarding *FDS*

Request:

- AC councilors, mayor and deputy mayor must attend workshops and meetings that explain AUPOIP and *FDS* before the decision on *FDS*

- AC councilor, mayor and deputy mayor must attend workshops and meetings regarding issues raised during consultation before the decision on *FDS*

[redacted]

c/- [redacted]

[redacted]

[redacted]

3. Avoiding hazards

Springleigh RA opposes the question for the following reasons, but not limited to:

3.1 Question is misleading and does not represent key issues of FDS

- the key issue of 'avoiding hazards' is not fairly represented in the *FDS consultation draft* as well as the feedback form which is contrary to *LGA*.

- *FDS* does not actually include an approach to environmental risk management. It states that it cannot assess hazards in 4.26. of *FDS consultation draft*.

- *FDS* refers to natural hazard in 2.4.4. (p11) of consultation draft. It clearly states that Auckland Council does not propose 'infrastructure' as defined by *RMA91* and proposed environmental legislation in areas at risk from natural hazards. Instead, it uses vague and plagiarized terms not defined in *FDS* or environmental legislation and LGA.

Request: - *FDS consultation* must represent the key issue of 'avoiding hazards' in a manner relevant to the proposed statutory processes

3.2 Feedback form question and FDS consultation are a case of bad plagiarism

-*FDS consultation draft and related feedback from question* are contrary to the statutory process of *FDS proceedings* and do not fulfil the requirements of LGA in the section 'avoiding hazards'

- Questions in the feedback form itself are not labeled but we assume that it is the 'third question',

- *FDS* consultation draft identifies coastal inundation, erosion/slips, flooding, coastal erosion in a figure that is not properly labelled, e.g., has no number, and no proper title. The figure does not include a reference. It is obviously copied from somewhere in a bad case of plagiarism and not permissible in the statutory process and in consultation.

- anecdotal wording, e.g., but not limited to, 'areas .... to be looked at' does not identify an activity under *RMA91*, 'appropriate actions' are not defined by *FDS* or *RMA91*,

- 'adapt' is not defined and can apply to private as well as public property according to the consultation draft, 'adaptation' is used randomly in flow charts in the consultation document. On several occasions 'adapt' and 'adaptation' implies that ratepayers finance private development and private land-owners which is contrary to *LGA*

- *FDS feedback form* is different from previous feedback forms, especially but not limited to, the plan that it is replacing

Request: - *FDS feedback form* does not fulfil the requirements for consultation under *LGA*

- relevant consultation supported by evidence must be undertaken

3.3 Auckland Council ability to govern

- the 'third question' and relating documents raise doubts about Auckland Council's ability to govern in accordance with the LGA

- Auckland Council understands the *feedback form* and *FDS consultation draft and evidence report* in relation to, but not limited to, 'Avoiding hazards'

- it is not transparent from *FDS consultation draft* whether Auckland Council, including councilors, mayor and deputy mayor have attended workshops and meetings regarding 'avoiding hazards', how many members have attended workshops and meetings, and how many members have attended for the full length of meetings and workshops

Request: - the 'third question' or section 'avoiding hazards' must be removed from *FDS feedback form*

- a new question, fairly representing 'avoiding hazards' and supported by an evidence report is to be inserted into the feedback form

- Auckland Council understands 'avoiding hazards', as required by LGA

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Springleigh RA opposes the 'infrastructure' proposal of FDS for the following reasons, but not limited to:

4.1 'Resilient infrastructure' constitutes misleading consultation under LGA

- the 'fourth question/survey' of the *feedback* form is not a fair representation of *FDS* under LGA

- 'infrastructure' is used in a misleading manner in a statutory document

- *feedback form* and *consultation draft* imply that 'infrastructure' will be undertaken in the form of infrastructure projects which is false and misleading

- 'infrastructure' is defined in p1s2 of the *RMA91* and relates to s30 of *RMA91*, as well as proposed environmental legislation, as well as by *Unitary Plan* provisions. *FDS* re-litigates these even in the case of Central Government Legislation.

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- 'Infrastructure will be viewed as a system …' is a meaningless paragraph (p18) in terms of existing and proposed environmental legislation and LGA. The paragraph seems to suggest a 'do-nothing' approach to infrastructure.

-p. 22, the unlabeled and unnumbered figure needs adequate technical explanations and must state relevant existing and proposed environmental legislation considerations, AUPOIP and *LGA* requirements.

- *FDS* believes that 'swales', 'raingardens', among others, are permitted in 'parks'. However, according to AUPOIP, Auckland does not have 'parks' instead it has got 'Open Space' zoning that clearly states the purpose of 'Open Space'. 'Road Reserve' is included in 'Open Space' provisions of *AUPIOP*, in FDS it is separate.

- the use of public 'Open Space' for private development is not sufficiently supported. An unlabeled, unnumbered figure is inadequate. The figure is highly unprofessional but appears to illustrate a 'key issue'.

Request: - the question on 'Resilient Infrastructure' to be deleted because both *FDS consultation draft* and *FDS feedback form* are misleading and do not fulfil legal requirements

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- *'incentivising'* is outside of *LGA*, not defined by *FDS*

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-this key issue is not fairly represented in the consultation draft; the feedback form does not provide a survey/question on this issue.

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- FDS proposes to rezone 'Open Space' for private development in the unnumbered and unlabeled figure on p22 which is outside of *LGA provisions*

- 'Open Space' among other *AUPOIP matters* along TeAuaunga/Oakley Creek and Pollen Island Marine Reserve is affected

Request: - rezoning of the entire 'Open Space' provisions of AUPOIP is not supported by *FDS*

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- Springleigh RA is disappointed by the unprofessionalism frequently revealed in *FDS* but particularly about the one revealed on p.22.

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Te Auaunga/Oakley Creek

- in particular, but not limited to, it proposes to discharge wastewater (p.22) in TeAuaunga/Oakley Creek and Pollen Island Marine Reserve. TeAuaunga/Oakley Creek is a 'Ecological Significant Area' of *AUPOIP. Pollen Island Marine Reserve* is a national park under central government legislation.

- the environment court decision on *SH20* Waterview connection is re-litigated where it affects, but not limited to, Te Auaunga, 'Open Space', Sports fields, wetlands as a matter of national significance under *RMA91,*

- proposed 'detention basins' take up valuable 'Open Space' in open spaces surrounding Oakley Creek such as Walmsley and Underwood Park in low-income communities. The social and environmental effects of this are not addressed.

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- presently, 'infrastructure' yards occupy an ever-increasing part of Walmsley Park, opposite the Wesley Community Centre, yards occupy areas that are subject to a resource consent which required them to be planted and open to the public. Contractors use the community centre parking lot, often with the engines of their vehicles running for extended periods. Overall, the environmental and social effects due to the loss of 'Open Space', years of disruption of community life, economic effects on the Wesley community market are major.

Pollen Island

- *Pollen Island Marine Reserve* requires that the Department of Conservations is notified and provided with relevant Assessments of Environmental Effects

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- sections relating to the 'fourth question/survey' be removed from *FDS evidence report and consultation draft*

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[redacted]

[redacted]

[redacted]

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Other feedback

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For example, but not limited to:

-neither the executive summary nor the *FDS consultation draft* provide a fair representation of the extent of plan changes to *AUPOIP* required.

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4. Neither the executive summary nor the FDS consultation draft provide a fair representation of the costs that ratepayers incur.

5. *FDS evidence report and consultation draft* differ from similar reports required in similar statutory processes such as, but not limited to, *Auckland 2050*

6. *FDS feedback form* is different from feedback forms in several, similar consultation processes that Springleigh RA has participated in on several occasions over many years/decades.

7. *FDS consultation* is chaotic for a standard statutory process, e.g., needed the extension of consultation duration, additional library consultation etc.

8. *FDS* does not reveal the payments that AC is required to make for private development.

9. *FDS consultation document and feedback form* do not provide a fair representation of key issues because major evidence is left out.

10. FDS consultation draft is unprofessional and contains plagiarism

11. The feedback form is not a fair representation of *FDS consultation draft*.

- it contains four surveys or questions while *FDS* consists of five principles.

- feedback form does not clarify that *FDS* is about 'rezoning', 're-litigation'

- wording of the survey questions does not match to sections or principle in *FDS consultation draft*

- a survey on whether residents approve or disagree with proposed Plan Changes to *AUPOIP* is not included,

12. *FDS consultation draft* raises the question whether Auckland Council, such as individual councilors, mayor and deputy mayor are competent and are fulfilling their duty under LGA. *FDS* requires substantial knowledge of present and proposed environmental legislation, as well as *AUPOIP* proceedings and content.

13. *FDS* re-litigates Springhleigh RA's submission on *Stormwater Network Discharge Consent*, our further submission on the Wairaka Precinct, our submission on *AUPOIP*, our submission on *SH20 Waterview connection*, among a host of submissions that Springleigh RA has submitted relevant to *FDS.*

14. Attached is a document that combines our feedback comments in one document, and that we understand is part of a statutory process.

Future Development Plan 2023 #7594

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

The are areas that have infrastructure , transport networks, minimal environmental impacts, close work, home, community areas, acessable by bike/walk, close to Auckland City that should be allowed to developable for housing. eg Dairy Flat south and the Penlink Interchage being built.

Accessible local centres

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

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

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

Agree

Tell us why

You have to allow for growth. Let there develope new communities so people do not have to spend large amounts of their time on travel.

Avoiding hazards

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

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

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

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

Agree

Tell us why
Dairy Flat/Redvale/Penlink interchange area does not have major environmental hazards.

Resilient infrastructure

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

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

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

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

Disagree

Tell us why
Dairy Flat is an above average high tech area and should be encouraged to develop.

Other feedback

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

Let the Dairy Flat/Silverdale/Orewa are grow to be come a satellite type area to Auckland City.

#7594

LAKES GOLF COURSE LIMITED

[redacted]

Auckland City Council
Private Bag
Auckland
Via email: akhaveyoursay@aucklandcouncil.govt.nz

Dear Council

RE: Have your say: Future Urban Land Supply
Dairy Flat metropolitan/Town Centre and related areas
Inparticular area east of SH1 and surrounding the Penlink interchange with SH1,
And East Coast Road, Dairy Flat

I consider that the issues are:

1. Inclusion in the development of the city should be based on merits, not on a requirement for more capacity.

2. The land sought to remain in the urban boundary is an area of 274 ha east of SH1 and East Coast Road, Dairy Flat. It includes the former Lakes golf course area of 19 ha which is called Worsnop Valley in the Auckland Council's section 32 report maps dated 20/6/2013 "Landscape Sensitivity & Landscape Capacity for Urban Development". The former Lakes golf course is located in the middle of the valley. The land is closer to Auckland than Silverdale, Millbrook, Milldale area.

3. The boundary of the land is the ridgeline on the eastern side and SH1 on the western side. The area can easily be defined geographically by reference to the ridgeline which forms a defensible boundary.

4. Stormwater, water and wastewater services.

a. Stormwater: All stormwater runs west through Dairy Flat to Lucas Creek Albany, then to the Upper Waitemata. No water flows to the east Okura Marine reserve area. Refer to the attached reports.

b. Water: 2 large diameter water mains are currently located in East Coast Road servicing the Hibiscus Coast area. These could also service the Worsnop Valley area. There has been constructed a major pumping station along East Coast Road to cope with the future demand for the greater area.

c. Wastewater: this is likely to be piped along the PENLINK Route to the Whangaparaoa treatment station. Alternatively it could be connected to Dairy Flat. This can be worked out at the structure plan stage.

d. The Worsnop valley is not constrained by environmental factors.

5. Transport

a. PENLINK is located central to the area of land.

b. The Lakes Golf Course Ltd land provides an ideal location for a new transport hub and associated park and ride facilities to service an extended Northern busway system.

c. The Lakes Golf Course Ltd land is also adjacent to the SH1 proposed interchange (part of PENLINK designation). It makes sense to have development around a future transport hub.

d. East Coast Road is currently served by school bus routes.

e. Silverdale is 5km to the north, Albany Megacentre is 12km to the south. And a new centre is planned for the Dairy Flat Basin

f. Internal roads to the area are proposed and can be built off the existing side roads coming off East Coast Road, (e.g.Worsnop Way and Jackson Way) and the proposed PENLINK.

6. Social Amenities

a. Aucklander's love of the beaches has meant that development has occurred firstly between the coast and the motorway and later on the inland areas. e.g. Mairangi Bay developed before Forrest Hill, Orewa/Whangaparaoa developed prior to Silverdale. The Lakes Golf Course area is likely to be no different because it is closer to the beaches than Dairy Flat. Okura will be the closest beach.

b. Public libraries, public swimming pools, sporting facilities, and a mix of private and public schools exist at both Albany and Silverdale and would service the Lakes Golf Course land including Worsnop Valley. Additional facilities can be developed as part of the structure planning.

c. 30 years ago, my wife and I lived in Greenhithe. Urban development finished at Sunset Road, Glenfield. At that time going north the next township was the Albany Village, then Silverdale Village. 30 years on it is very different and the Albany/Silverdale area is growing at a faster rate than most of Auckland. It makes sense to provide for a larger area for this expansion so a comprehensive structure planning process can be completed. It seems incongruous that land that surrounds key future transport infrastructure to service urban growth is not provided at least the opportunity to form part of the planning exercise.

d. Most people do not want to live adjacent to an airfield. The Lakes Golf Course and Worsnop Valley land is located on the opposite side of the Northern motorway to the airfield which provides separation and a buffer to this activity.

e. Many people like to live on an elevated site with views and not on flat land. The Worsnop Valley provides the opportunity for elevated house sites.

7. Topography

a. Council's own data confirms that the Lakes Golf Course land including the Worsnop Valley can accommodate urban development. Refer Independent Expert Reports attached. The area is flat to mild sloping pastoral land. There is no significant area of native bush.

b. The worst constraints in the area may require moderate additional work. However these constraints do not apply to the total area, and can be resolved at the application stages.

c. Existing houses are scattered over the valley on the already. The soil types on the Lakes Golf Course land are in keeping with the wider Dairy Flat area and generally those over greater Auckland.

d. The ridgeline forming the eastern boundary provides a natural defensible boundary for the city boundary.

e. There is nothing unusual with the soil and the area can be easily defined.

8. North Shore Airfield

a. The airfield is limited in length and therefore capacity.

b. It is reasonable to expect that it will accommodate smaller aircraft for the next 30 years. It is already used for commuter traffic.

c. The North Shore Airfield runway is approx 1.5km in a straight line from the former Lakes golf course property.

d. The main runway alignment is parallel to Worsnop valley. I therefore believe that the airfield is far enough away to not be a problem.

9. Personal Comment

a. My wife and I have owned the former Lakes golf course property for 20 years. We have seen the area develop already and believe the area is well located for future urbanisation because of its strategic location between Albany and Silverdale as Auckland closes in between these two areas.

b. The land is uneconomic for farming. There is only pastoral farming, with scattered pine trees. There is no significant native bush.

c. We therefore believe the Lakes Golf Course land and Worsnop Valley land is well located and has the attributes and merits to be included in the Urbanisation.

10. Te Tupu Ngatahi (part of Waka Kotahi) is planning to build cycle and walkways along East Coast Road, and Penlink so as to intergrate work space with living.

11. Expert Evidence

I have copies of the independent expert evidence for the Unitary Plan Process. The reports are still relevant and cover the following areas. These are available to you. Council has them on file. Let me know if you would like them. All reports have been prepared by independent qualified experts.

The reports cover the areas of :

Ecology Catchment Boundary – shows no constrains and water flows to the upper Waitamata and not the Okura Marine Reserve.

Geotechnical Constraints Assessment – soils are suitable for housing development.

Lakes Golf Course Catchment are is adequate.

Landscape Report – No significate Landscape problems

Planning Evidence for Lakes Golf Course – suitable for subdivisioon

Plannng PAUP

Urban Design Evidence – area fits into existing infrastructure.

Urban Planning Dairy Flat – close proximity to work,

Maps

12. The unqualified decision reports by the Independent Auckland Unitary Plan confirming the suitability of the area for urbanisation. Refer to Page 12, item 2.4.2 Extension at Orewa, Wainui, Pine Valley and Dairy Flat of the Panels decision. The report is called "Report to Auckland Council - Changes to the Rural Urban Boundary, rezoning and precincts" and is available to you.

13. If allowed, I am willing to appear before the committee making their recommendations to Council. Please confirm you have received this email.

Yours faithfully





Future Development Plan 2023 #7627

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Your feedback

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

Other

Tell us why

We generally agree that growth needs to be focused within existing urban areas, and more intensive, but that investment in infrastructure needs to occur to ensure that existing development is adequately supported with appropriate services including road capacity, stormwater and wastewater treatment. While there appears to be adequate capacity available, development may not occur in the order that Council expects it to develop, so opportunities for landowners (where larger areas can be coordinated) need to be allowed the opportunity to investigate the feasibility of development of areas outside those currently zoned for future development.

Accessible local centres

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

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

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

Other

Tell us why
A level of commercial or industrial development needs to be provided near all existing residential areas so that communities can 'work in place', but in reality that is not happening so good connectivity still needs to be provided across the city so that people from other communities can have good access to work opportunities and services in other parts of the city, where they are unable to work near to their homes.

Avoiding hazards

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

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

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

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

Agree

Tell us why
While we agree that mitigating flood hazards through a comprehensive flood mitigation system will provide the best outcomes for Auckland, this has the potential to compromise the existing value of 'Future Urban' zoned land. This land has value that has essentially been created through the FUZ zoning, and is now being removed. Landowners need to be compensated if they are providing Auckland with a much-needed resource - being land that is able to 'hold water' for flood mitigation purposes. For landowners to gain the potential of their land they could offset this through higher density development on the parts of the site that are not within flood plains, but if this does not align with what AC want to achieve (i.e higher density on periphery of the city), landowners are left out of pocket by this rezoning process. Proper investigation is required to ensure the right decisions are being made, rather than assumptions based on initial flood modelling. While we appreciate the need to ensure space is available for future engineering/ wetland solutions for a stormwater mitigation system, it is pre-emptive to remove future development potential at this stage without carrying out thorough geotechnical investigations.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Nature based infrastructure is the current best-practice and will help to meet the wellbeing needs of all Aucklanders. We support the use of this type of infrastructure with appropriate investment and servicing. However, this needs to be located in appropriate locations, and in situations where existing flood plains and their surrounds are to be utilised, current landowners need to be appropriately compensated for the development potential that is removed and the contribution they make towards creating best practice quality infrastructure for Auckland.

Other feedback

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

The Future Development Strategy sets out some logical responses to some of the pressures that Auckland is currently facing, but it does little towards providing a level of certainty for landowners as to how they can help provide good outcomes for Auckland.

Landowners would like to retain the right to fully investigate the options to at least rezone the land, if not carry out residential or commercial development.

The FDS appears to primarily focus on flood matters, and identifies current FUZ areas that are 'not suitable' for residential development, but avoids providing direction as to what these areas are suitable for. Land beyond the 1% AEP floodplain (currently zoned Future Urban) has also been identified as 'not suitable for residential development', but the primary justification of this effective rezoning is about flooding – these two distinct areas are not differentiated.

We argue that further investigation is required before the FUZ zoning is lifted, and that land that is not within the 1% AEP flood plain needs to be considered separately to land affected by the floodplain. If land beyond the floodplain is required for comprehensive flood mitigation or nature based flood infrastructure, this needs to be clearly shown, and landowners need to be compensated for their contribution to providing a more resilient city.

While we understand that the next step is a more thorough implementation planning process by the Unitary Plan/ Plan Change team, this process provides direction to that group and will influence their workstream as well as their decision making and funding.

There is a process underway for compensating those individuals whose property has been affected by recent flood events, and we argue that a level of funding is required to be set aside to ensure adequate land is purchased by Auckland Council at a fair rate to ensure appropriate infrastructure is provided in the future. This 'un-zoning' process removes value from large swathes of land that may potentially be used for future infrastructure projects, thereby making the infrastructure projects more affordable. Auckland Council has been collecting rates from landowners who had land values based on future development potential, that is now being removed.

This group of landowners would like the opportunity to be heard, or to meet with Council to ensure landowners views are taken into account in finalising decisions on the Future Development Strategy.

Auckland Council

c/o AKhaveyoursay.aucklandcouncilgovt.nz

I have prepared this submission on behalf of a number of landowners in the northwest of Huapai. This page includes the questions on the consultation form and sets out a coordinated response from four landowners.

Focussing Growth

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

~~Agree/ Disagree~~/ Other/ ~~I don't know~~

We generally agree that growth needs to be focused within existing urban areas, and more intensive, but that investment in infrastructure needs to occur to ensure that existing development is adequately supported with appropriate services including road capacity, stormwater and wastewater treatment. While there appears to be adequate capacity available, development may not occur in the order that Council expects it to develop, so opportunities for landowners (where larger areas can be coordinated) need to be allowed the opportunity to investigate the feasibility of development of areas outside those currently zoned for future development.

Accessible local centres

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

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

~~Agree/ Disagree~~/ Other/ ~~I don't know~~

A level of commercial or industrial development needs to be provided near all existing residential areas so that communities can 'work in place', but in reality that is not happening so good connectivity still needs to be provided across the city so that people from other communities can have good access to work opportunities and services in other parts of the city, where they are unable to work near to their homes.

Avoiding hazards

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

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

Agree/ ~~Disagree/ Other/ I don't know~~

While we agree that mitigating flood hazards through a comprehensive flood mitigation system will provide the best outcomes for Auckland, this has the potential to compromise the existing value of 'Future Urban' zoned land. This land has value that has essentially been created through the FUZ zoning, and is now being removed. Landowners need to be compensated if they are providing Auckland with a much-needed resource - being land that is able to 'hold water' for flood mitigation purposes. For landowners to gain the potential of their land they could offset this through higher density development on the parts of the site that are not within flood plains, but if this does not align with what AC want to achieve (i.e higher density on periphery of the city), landowners are left out of pocket by this rezoning process. Proper investigation is required to ensure the right decisions are being made, rather than assumptions based on initial flood modelling. While we appreciate the need to ensure space is available for future engineering/ wetland solutions for a stormwater mitigation system, it is pre-emptive to remove future development potential at this stage without carrying out thorough geotechnical investigations.

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Agree/ ~~Disagree/ Other/ I don't know~~

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Other feedback

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

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Landowners would like to retain the right to fully investigate the options to at least rezone the land, if not carry out residential or commercial development.

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While we understand that the next step is a more thorough implementation planning process by the Unitary Plan/ Plan Change team, this process provides direction to that group and will influence their workstream as well as their decision making and funding.

There is a process underway for compensating those individuals whose property has been affected by recent flood events, and we argue that a level of funding is required to be set aside to ensure adequate land is purchased by Auckland Council at a fair rate to ensure appropriate infrastructure is provided in the future. This 'un-zoning' process removes value from large swathes of land that may potentially be used for future infrastructure projects, thereby making the infrastructure projects more affordable. Auckland Council has been collecting rates from landowners who had land values based on future development potential, that is now being removed.

This group of landowners would like the opportunity to be heard, or to meet/ workshop with Council to ensure landowners views are taken into account in finalising decisions on the Future Development Strategy, and the next step being an implementation plan.

Future Development Plan 2023 #7640

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Your feedback

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

Agree

Tell us why

Accessible local centres

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

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

Agree

Tell us why

Avoiding hazards

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

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

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

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

Agree

Tell us why

Resilient infrastructure

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

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

Agree

Tell us why

Other feedback

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

Future Development Plan 2023 #7644

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Your feedback

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

Agree

Tell us why

Large urban conurbations require more density. One cannot continue to sprawl and build second rate housing which is what has happened in the auckland area. A maximum of four to five levels is a norm in many European cities and more well built density building is required in Auckland. However quality needs a vast improvement rather than cheap and tacky.

Accessible local centres

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

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

Agree

Tell us why

Obious practical considerations for transport hubs, retail and all the normal paraphenali of urban living

Avoiding hazards

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

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

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

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

Agree

Tell us why

Much better long term planning and much better quality structure plus regular cleaning and maintenance. Do not build on unsuitable land which floods

Resilient infrastructure

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

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

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

Agree

Tell us why

Obvious that that is what is required

Other feedback

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

More Density; higher quality buildings; awareness of light when building such structures; maximum level size; build structures to enhance human interaction rather than isolate; located suitable local retail and other services; regular and cheap transport to link these areas

Future Development Plan 2023 #7657

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

Other

Tell us why

Greater housing density needs to be implemented selectively. Higher density housing should occur close to existing or potential public transport hubs and services, take account of existing infrastructure and upgrade costs, take account of climatic impacts, potential for multi modal transport systems and retention and potential enhancement of community and recreational facilities. Limited greenfield development should not be discounted. In the case of Warkworth and Pukekohe, these centres are natural hubs servicing large areas, all of which are subject to rapid growth. Already significant investment in infrastructure has occurred and Private Planning Changes are already in place for construction of several large housing developments. In Warkworth construction is underway on two developments where 1500 housing units are being built. Another Private Planning Change is being processed for a further 1700 housing units. Investment in completion of infrastructure to support these developments is required within the next 5 years, not in 30-35 years.

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

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

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

Agree

Tell us why

These principles should also be applied to Pukekohe and Warkworth. It is essential to reduce carbon footprint so that industrial and commercial development occurs close to residential areas, schools, health services, retail centres and community and recreational facilities are provided close to residential areas and are also linked by multi modal transport systems such as public transport, and walking and cycle ways. This requires an integrated planning process involving Agencies with the community, and other key stakeholders. This has only occurred in part and there are some very poor planning processes that have occurred such as NOR's issued by Support Growth Alliance which truncate previously designated industrial zones, zones for health facilities and the location of a new school which is in the most inappropriate location it could be in terms of transport connectivity and distance from new residential growth, all carried out without any consultation with Iwi, existing schoold or the community.

Avoiding hazards

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

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

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

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

Agree

Tell us why

Resilient infrastructure

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

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

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

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

Agree

Tell us why

The provision of resilient infrastructure may also be a limiting factor on intensification of existing urban areas. The provision of nature gardens, swales and detention centres are more easily provided on greenfield developments thus making Warkworth and Pukekohe attractive options to provide exemplar models.

Other feedback

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

Draft of Coordinated Submission on Future Development Strategy - Warkworth district

By Warkworth Community Strategy Group

Introduction

This submission has been put together by a group of concerned Warkworth organisations, professional engineers and planners, as well as development representatives. We share concerns about the proposed development strategy and its proposed implementation.

This Group consists of representatives of One Mahurangi Business Association, Warkworth Area Liaison Group (a forum for residents and community groups), and professional engineers and planners from the local community.

We see significant discrepancies with the overall Strategy and the impact this will have on the most appropriate form of development for Warkworth.

"Development of Warkworth must bring jobs and homes closer together as well as multi-modal transport networks that enhance community connectivity."

Current planning and its implementation show no signs of resolving this.

Issues with Past Process

1. **A coordinated planning approach**
    a. It is essential to have a fully coordinated regional planning approach to accommodate growth in both existing urban areas and those to be set aside for future urban growth. This has yet to be undertaken and implemented.

    b. There should be more detailed Local Plans (eg Structure Plans with detailed Plan Changes incorporated) to provide guidance and certainty for developers and the community.

2. **Recognition of Major Economic and Environmental Changes**
    a. There have been very significant changes in economic circumstances over the past few years due to Covid, economic uncertainties created from that and from severe weather events. This has required major shifts in emphasis to be made in the management of urban development and the location and form of any urban growth.

    b. It is highly inappropriate to continue along present paths to meet these changed demands. The new strategy has to be much more resilient both economically and environmentally. It is thus even more important to coordinate the needs for both physical development, be it housing, commercial or industrial, with the practical requirements for

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infrastructure, be it utilities, roading, community and social facilities and amenities.

c. This is particularly necessary for the fast growing Warkworth district, which has been recognised as a future urban growth area in the Rodney region. Land use planning has been guided by the Warkworth Structure Plan as well as the past Development and Infrastructure Strategies.

3. Issues with the current Growth Development Process in Warkworth

a. The Warkworth Structure Plan identified areas for future growth and showed a new roading network to accommodate this. However, it excluded the CBD and existing developed areas. A Warkworth Centre Plan is being independently developed.

b. Council's direction through the new Unitary Plan stated that future growth proposals would be implemented not by Council but by private developers, through a series of Plan Changes that, if appropriate, would be approved for processing by the full Council.

c. The Structure Plan also indicated an indicative time frame for infrastructure development to ensure that new development areas could be adequately serviced. There has been no rational staged release of urban land by Council linked to an infrastructure programme that could actually meet the growing demand for new housing, commercial and industrial areas. Development has thus been occurring by way of Private Plan Changes and were approved in recognition that such infrastructure would be available to meet the demand. However, provision of infrastructure is out of sync with the developments and already there are example of infrastructure not being available to service these new approved developments.

d. The situation is further exacerbated by infrastructure planning being co-ordinated by the rather unwieldy organisation the Supporting Growth Alliance (SGA), a conglomerate of a number of Government and Local Authority Agencies which in turn have delegated a number responsibilities to Consultants who are not empowered to take a big picture approach.

e. Insufficient meaningful consultation with community organisations and developers has led to a number of inappropriate and conflicting proposals.

An example would be the southern section of the Western Link where SGA's proposed route bisects the remaining Glenmore St/Morrison Drive industrial estate making future development practically

impossible. Further this same proposal carves off part of the land designated for the development of new health facilities.

Another example is the locating of a new school on Woodcocks Rd in an area that is dangerous and far away from future catchments. The selection of the site was carried out with no consultation with the local community, local schools or even reference to the Structure Plan.

The Preparation of any development strategy requires a good consultation process with the local communities, key organisations and the experienced local professionals. Consultation has to be genuine and transparent and have majority support of the community as a whole to be successful.

f. There have however been some good examples of collaborative cooperation with various agencies (such as Council and Government) by our local organisations (such as the Mahurangi Transport and Infrastructure Forum) with such projects as the Matakana Link Road, Hill Street and the Watercare waste water main so we would encourage these examples to be used as a model for future community engagement.

Issues with the Proposed Development Strategy

1. **General**

   We have identified texts and diagrams from the document and analysed them (with appropriate page numbers).

2. **Comments on Strategy Details**

   a. Its general objectives are to "*align growth with infrastructure provision to support development and change in existing and new communities, **in the right place and at the right time*** and *to focus investment in locations that will achieve the greatest benefits with a strong focus on aligning land use with infrastructure."*

   The Strategy needs to ensure that these objectives are met, which is not occurring at present.

   b. It also states that wise investment decisions are essential" *as infrastructure is costly in a financially constrained environment. It is therefore essential to ensure developers pay an appropriate share of the investment they contribute to the need for and will benefit from."*

   This is accepted, but there must be stronger coordination between Council and the developers to ensure that the infrastructure will be available for the completion of that development and that the needs of

the community, developer and Council align. This has not always been the case.

c. Some of its Principles for Growth and Change are "*to make efficient and equitable infrastructure investments, to support reduction of greenhouse emissions,* and to *enable sufficient capacity for growth in the right place and at the right time."*

   To do this it states that it needs "*to intensify the existing urban areas and limit further urban expansion*", but also states that it "*must bring jobs and homes closer together*."

d. Intensification of existing urban areas v future growth expansion: the emphasis of this Strategy is now on further intensification of the existing urban areas and limiting growth in the outer future urban zoned areas such as in Warkworth. Council considers that this is the most appropriate response to the changing economic and environmental challenges, as outlined in the Strategy's fundamental principles.

   In Part 4 Spatial Response P33 re Existing Urban Areas: *"communities at different scales, regional, sub-regional and local have different but complementary roles. Nodes at subregional levels will over time lead to greater sustainability or local centres and communities. The model anchors Warkworth (and Pukekohe) as rural nodes."*

   It talks about *"centres at the local scale (not specifically about the rural nodes) being mixed use, integrating non- residential uses compatible with residential activity. This would create strong communities*."

e. This should be applied to growth nodes such as Warkworth! In Fig 12 re existing urban areas it shows Warkworth as one (as a node). We consider that all the factors applying to the existing urban areas should apply to Warkworth, so that it can become a more integrated urban area, with well-designed residential areas and industrial and commercial areas close by. Warkworth also needs to be designed to service the needs of the wider Mahurangi population that is also growing rapidly.

   In para 4.2.2 Future Urban Areas identified "*the Future Urban zoned areas for limited urban expansion."* The 2017 FUL Strategy had a coordinated approach to timing with a sequencing of development over 30 years. Comprehensive planning and integrated planning was needed, to ensure sufficient capacity in the infrastructure systems. Efficient use of FUZ meant higher density housing and employment with appropriate infrastructure and environmental protection.

f. From the analysis of all the triggers to provide the most appropriate form of growth development, there was a major focus on the recognised urban areas and the centres within that. Despite the strong

indication of the role that Warkworth is designed to play as a significant growth node in a rural area, there was little recognition how the same principles could (and should) readily be applied to the demand for growth of the town. It has the real potential to fulfil that role so long as the growth is planned appropriately and further investment made for the necessary infrastructure in the near future. Further growth will be restricted by the lack of such investment.

g. In Appendix 6 Future Urban Infrastructure Triggers (AP p 25) it indicates such triggers for the FUZ areas as such. The key ones are highlighted below:

   Warkworth North: western link; Matakana Road upgrade; northern bus interchange with P&R; more frequent bus services; Wastewater Strategy (new pipelines, pump stations, treatment plant and pipes)

   Warkworth West: SH1 Southern interchange and arterial connection (Woodcocks Rd); wider western link; improved bus services

   Warkworth South Central: western link (southern link); improved bus services.

   Warkworth Southwest: SH1 southern interchange and arterial connection; wider western link; bus services

   Warkworth north east: upgrade facilities on Sandspit Road; Sandspit Road link; bus services

   We consider that priority should be given to:

   1. *Resolution and release of industrial land*
   2. *Bring jobs and homes closer together*
   3. *Local bus services within Warkworth to minimise the need for families to have more than one car.*
   4. *Establish an operational transport network that is in place in a time to service new developments.*
   5. *Establish multi mode transport options (walking and cycling)*
   6. *Develop an environment that maximises leisure and recreation via parks and walkways.*
   7. *Establish new schools close to areas of major new growth to minimise reliance on motorised transport.*
   8. *Housing intensification should be limited to greenfield sites to reduce stress on existing infrastructure.*
   9. *Establish other community services such as health facilities.*

h. We challenge the direction that the Strategy proposes in that it will not achieve all the outcomes that it expects. There are major issues with intensification in existing areas with respect to the capacity of existing infrastructure and roading networks, with natural hazards, and loss of amenity.

It is understood that some future urban growth areas would have environmental impacts (eg loss of useful land, attractive landscapes, etc). However, Warkworth has always been recognised as a growth node in this northern sector and has had significant investments in infrastructure to accommodate future growth. With more detailed analysis of the land's potential, appropriate forms of development can be accommodated in the areas set aside for such growth. We are concerned that some of the proposed patterns of development need to be reviewed in light of changing circumstances. Our Group has already been involved in offering more appropriate solutions but mostly these have been ignored.

i. The Strategy in its Growth Appendices – Appendix 7 (Appendix P 29) and 8 (Appendix P36) and Figure 35 (Appendix P 41) – indicates its approach to the review of future growth areas. These have been re-evaluated against key criteria:
   - *Exposure to natural hazards*
   - *Modelling of increased CO2 emissions*
   - *Infrastructure timing and delays*

   Other ones were (of relevance to Warkworth): "*committed Council infrastructure; urban form and future business land provision; impacts on the natural environment."*

j. With the proposed areas (FUZ) set aside for growth, with good detailed design, there would be limited adverse impacts on the natural environment. The provision of more industrial (and commercial) development would potentially reduce work journeys out of the district. It would however be dependent on improving the overall infrastructure capacity and thus the release of some areas would have to be delayed. Developers would be willing to coordinate with Council to enable the necessary connections can be made before development is finalised. It is essential that further employment opportunities are provided as soon as is practical.

k. We comment on the 4 possible alternative growth scenarios and their explanation (P26). In all of them, they indicate that "*Warkworth is either an important rural growth centre (one indicating significant growth) or even an important rural node*." Only Pukekohe and Warkworth are highlighted in this way, showing how important Warkworth is in accommodating growth in this northern sector.

   With respect to the employment options only Scenario D states that employment growth should match residential growth through mixed uses. All the others indicate that "*employment growth just reinforces past trends in supporting the agglomeration benefits of the city centre and nodes"* (within the existing urban zones).

We would only support a development scenario (like D) that both recognises the importance of Warkworth as a growth centre in a rural catchment but with significant urban potential especially for more employment opportunities. One option for the Western Link Road cuts through the new area set aside for industrial development. This would severely restrict the potential for a good industrial subdivision.

l. Warkworth has always been considered as an urban growth area, with a Structure Plan prepared to guide the form and extent of growth into Future Urban Zones. This contained an approximate staging of development into specific areas, on the basis that there would be further investment in the necessary infrastructure (roads and utilities).

m. Thus, having identified that Warkworth is a growth area, with its role as a "satellite" settlement, it is anomalous to limit growth in the town by delaying the release of land and providing the vital infrastructure. Housing demand is still high in the town but more employment opportunities are required. Having heavily invested in considerable improvements to the roading network and other infrastructure such as water and wastewater in the Warkworth district, it is very short sighted to limit opportunities for further development within the existing urban area.

   It is recognised that in the present tight economic circumstances, it is an easy option to restrain further development here and focus on the desire to increase density in the existing urban areas of Auckland City. This does nothing to reduce traffic movements to and from other major employment areas in the overall city for Warkworth residents who are moving here to attractive housing areas. In order to achieve a more self-sufficient town, Warkworth needs more employment options (commercial, industrial and services). Delaying such options will have an adverse impact on the wellbeing of the town and will contribute to a higher carbon footprint.

n. Appendix 8 (AP p 36) shows the intended change in the timing of releasing the FUD zone areas. As shown there are some significant delays to the present timetable and does not take account of Private Planning Changes already in place and others currently being processed.

Area	2017 Plan	New Plan	Reason
Warkworth North	2018-2022	2035+	Timing delay
Warkworth West	2018 -2022	2040+	Timing Delay

Warkworth South Central Planning	2028-2032	2040+	Further
Warkworth South East Planning	2028-2032	2045+	Further
Warkworth South West Planning	2028-2032	2045+	Further
Warkworth North East Planning	2033-2037	2045+	Further

3. Conclusion

We would like to see the entire Warkworth District reviewed with more detailed investigation and planning to produce a pattern of development that would provide the best outcomes for the community, in line with the overall objectives of the Strategy Document.

Our current preferences would be:

1. Modify the route of the southern section of the Western Collector to enable the Morrison Drive/Glenmore industrial zone to be fully developed and for health facilities to be provided.
2. Make available industrial zoned land in West Warkworth and adjacent to Goatley Rd in Warkworth North.
3. Complete the Western Collector Rd
4. Construct the Sandspit Link Road as a priority to remove major traffic congestion and safety issues from Sharp Rd for commuter traffic to Sandspit, Snells Beach and Algies Bay.
5. Prioritise infrastructure installation to Warkworth North (including the Arvida development) and North West Warkworth (Stubbs Development) to service developments already underway
6. Make available South West Warkworth for development including the construction of the Wider Western Link and a Southern Interchange to the new Motorway.
7. Make available North East Warkworth including upgrades of Matakana Rd and Sandspit Road.
8. Council planners lead the development processes in close collaboration with the local community, developers, land owners and local professionals to create a rational strategy supported by detailed implementation plans

Future Development Plan 2023 #7810

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Auckland is facing a housing affordability crisis and continued greenfield expanasion, particularly within areas already zoned future urban is critical towards efforts towards improving housing affordability, and to provide choice for people who do not wish to (and may not need to) live in established urban areas. For landowners within future urban zones, particuarly those who have purchased in reliance on that zoning status, and who are wishing to develop, there is also the matter of fairness. The district plan zoning (including a future zoning) should be able to be relied on, for people to order their affairs, including business decisions.

Accessible local centres

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

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

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

Disagree

Tell us why

Growth also needs to be focused in or around new or planned future local centres, even if some growth occurs in advance of those local centres establishing (ie until critical mass of population has been reached for such new or planned future local centres to develop).

Avoiding hazards

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

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

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

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

Disagree

Tell us why

This depends on the hazard. Some hazards, such as flooding risk, can be managed and provided for, for example, through design and innovation.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Other feedback

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

The property at Old Pine Road should be included as part of Silverdale West Stage 1, or alternatively, the entireity of the Wainui East area should be identified as intended to be development ready from 2033-2037 (as was originally the case under the Future Urban Land Supply Strategy 2017 (FULSS), rather than deprioritised to 2050+ or put under "further investigation".

Future Development Plan 2023 #7818

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Your feedback

Focusing growth

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

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

Other

Tell us why

Green building could be an alternative to the crisis of global warming. Control fires and mechanisms to extinguish fires immediately with technology and human potential.

Accessible local centres

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

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

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

Other

Tell us why

LIving and working spaces what does that looklike for the next 100 years.

Avoiding hazards

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

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

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

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

Agree

Tell us why

Absolutely

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Other feedback

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

Continue growing local capacity so people can build local capability working in harmony and collaborative peace is succinct and needed.

Future Development Plan 2023 #7832

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Your feedback

Focusing growth

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

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

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

Disagree

Tell us why

Accessible local centres

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

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

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

Other

Tell us why

Avoiding hazards

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

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

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

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

Disagree

Tell us why

Resilient infrastructure

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

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

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

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

Disagree

Tell us why

Other feedback

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

Future Development Plan 2023 #7858

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Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

CCRG are totally supportive of this approach.

New Zealand is currently in a social and environmental whirlpool stirred by decades of poorly designed urban expansion, producing inadequate numbers of unaffordable homes in locations that inevitably produce unsustainable levels of transport emissions. While this is not surprising, given most of this growth relies on the rapid international expansion of private motor vehicle transport, we know that this is the worst of all development options available to us today. Much of the land surrounding the outer edges of our city either have extremely high quality soils needed for food production and/or forest, flood plain or ocean that need permanent protection to support liveable environments.

Accessible local centres

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

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

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

Other

Tell us why

CCRG made submissions on the National Policy Statement Urban Development which we have attached. Our key position is to require that the NPSUD make provision for 6-8 story high quality residential developments in ALL urban areas within five kilometres of an urban/metropolitan centre. By ALL areas, we mean ALL areas other than listed or scheduled heritage – and not the proposed SCAs, which are pretend heritage.
Maximising the use of land by facilitating multi-story housing close to metropolitan and city centres facilitates affordable and reliable public transport options. It also supports the provision of healthy transport options such as cycling, micro-mobility vehicles and walking. Cities across the globe that were developed prior to the introduction of private motor vehicles, already have the housing density that supports a range of public transport and personal mobility options. Auckland does not need to reinvent the wheel – quality housing density already exists in hundreds of older cities so let's just utilise the knowledge they have acquired, find out how they have achieved it and just get on with the job.

Avoiding hazards

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

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

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

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

Other

Tell us why

From the various damaging weather patterns Auckland has experienced this summer, it has become evident that a lot of the urban areas where housing was developed in Auckland are on flood plains and/or vulnerable cliffs. These of course are a natural part of a natural world where nature always comes first, no matter how hard we try

to deny the fact.

CCRG's view is that we should support nature to do the job it does best, which is to look after us. Allowing nature to do its work ensures that our world has healthy forests, flood plains, food, water, wind, sun and sea. To maintain this essential equation, it is us that has to change and the easiest way for this to happen is to ensure that what nature does is respected and protected.

We would suggest that describing the natural world as creating areas 'which are exposed to significant risk of environmental hazards' is inappropriate. They are only hazards if we treat them that way – the reality is that all areas of the globe are made by nature for different purposes. We need to respect those purposes and build in areas that nature has already made safe for us and there is no shortage of these in Aotearoa.

In response to the statement that 'where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions' is a somewhat meaningless statement. CCRG can see no reason why a stronger, clearer and more certain statement would not be more appropriate given the earlier statement that these hazards are increasingly important.
We would suggest that a more appropriate statement would be …….potentially vulnerable areas will be rezoned based on the levels of potential risk….etc, etc. That provides certainty for everyone and further investigation of appropriate actions follows but we would suggest that the rezoning needs to be done first and as quickly as possible.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

CCRG support this approach in its entirety. In reference to our comments on Strategy 3, we can imagine that quite a considerable number of areas currently considered marginal for housing development, could be made suitable with appropriate nature-based infrastructure.
We also believe that this approach provides an excellent opportunity to accommodate 'a wide range of housing types to meet resident needs' and within the natural limitations of the area concerned.

Other feedback

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

Fit for purpose to achieve Auckland's housing needs.

Capable of being operational within the timeframes provided for in the strategy.

Provides opportunities to rapidly increase affordable housing supply.

Delivers on both government and Councils climate change obligations.

Maximises use of existing infrastructure over prohibitively expensive new infrastructure.

Supports affordable public transport over private vehicle use.

Accommodates a wide range of housing types to meet resident needs.

Priorities intensification within existing boundaries rather than property exploitation around perimeter areas.

Supports community development, as opposed to the community isolation of the past fifty years.

Allows easy and safe access for children attending various schools.

SUBMISSION TOPIC: Auckland Future Development Strategy 2023/2053
SUBMISSION FROM: Auckland City Centre Residents' Group
SUBMISSION TO: Auckland Council
CLOSING DATE: 31 July 2023

……..

Overview.

CCRG extend congratulations to all involved in the preparation of this draft strategy. The key points that we note are that it is -

Fit for purpose to achieve Auckland's housing needs.
Capable of being operational within the timeframes provided for in the strategy.
Provides opportunities to rapidly increase affordable housing supply.
Delivers on both government and Councils climate change obligations.
Maximises use of existing infrastructure over prohibitively expensive new infrastructure.
Supports affordable public transport over private vehicle use.
Accommodates a wide range of housing types to meet resident needs.
Priorities intensification within existing boundaries rather than property exploitation around perimeter areas.
Supports community development, as opposed to the community isolation of the past fifty years.
Allows easy and safe access for children attending various schools.

Strategy 1:
Focus on most of Auckland's growth in existing urban areas, rather than growing more at the edges of the city.

CCRG are totally supportive of this approach.
New Zealand is currently in a social and environmental whirlpool stirred by decades of poorly designed urban expansion, producing inadequate numbers of unaffordable homes in locations that inevitably produce unsustainable levels of transport emissions. While this is not surprising, given most of this growth relies on the rapid international expansion of private motor vehicle transport, we know that this is the worst of all development options available to us today.

Much of the land surrounding the outer edges of our city either have extremely high quality soils needed for food production and/or forest, flood plain or ocean that need permanent protection to support liveable environments.

Strategy 2:
Focus development near local centres giving people easier access to work, services, facilities and shops via walking, cycling and public transport.

CCRG made submissions on the National Policy Statement Urban Development which we have attached. Our key position is to require that the NPSUD make provision for 6-8 story high quality residential developments in ALL urban areas within five kilometres of an urban/metropolitan centre. By ALL areas, we mean ALL areas other than listed or scheduled heritage – and not the proposed SCAs, which are pretend heritage.

Maximising the use of land by facilitating multi-story housing close to metropolitan and city centres facilitates affordable and reliable public transport options. It also supports the provision of healthy transport options such as cycling, micro-mobility vehicles and walking. Cities across the globe that were developed prior to the introduction of private motor vehicles, already have the housing density that supports a range of public transport and personal mobility options. Auckland does not need to reinvent the wheel – quality housing density already exists in hundreds of older cities so let's just utilise the knowledge they have acquired, find out how they have achieved it and just get on with the job.

Strategy 3:
Avoid further growth in areas which are exposed to significant risk of environmental hazards.

From the various damaging weather patterns Auckland has experienced this summer, it has become evident that a lot of the urban areas where housing was developed in Auckland are on flood plains and/or vulnerable cliffs. These of course are a natural part of a natural world where nature always comes first, no matter how hard we try to deny the fact.
CCRG's view is that we should support nature to do the job it does best, which is to look after us. Allowing nature to do its work ensures that our world has healthy forests, flood plains, food, water, wind, sun and sea. To maintain this essential equation, it is us that has to change and the easiest way for this to happen is to ensure that what nature does is respected and protected.

We would suggest that describing the natural world as creating areas 'which are exposed to significant risk of environmental hazards' is inappropriate. They are only hazards if we treat them that way – the reality is that all areas of the globe are made by nature for different purposes. We need to respect those purposes and build in areas that nature has already made safe for us and there is no shortage of these in Aotearoa.

In response to the statement that 'where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions' is a somewhat meaningless statement. CCRG can see no reason why a stronger, clearer and more certain statement would not be more appropriate given the earlier statement that these hazards are increasingly important.

We would suggest that a more appropriate statement would be …….potentially vulnerable areas will be rezoned based on the levels of potential risk….etc, etc. That provides certainty for everyone and further investigation of appropriate actions follows but we would suggest that the rezoning needs to be done first and as quickly as possible.

Strategy 4:
Prioritise nature-based infrastructure that responds to the impacts of climate change.

CCRG support this approach in its entirety. In reference to our comments on Strategy 3, we can imagine that quite a considerable number of areas currently considered marginal for housing development, could be made suitable with appropriate nature-based infrastructure.

We also believe that this approach provides an excellent opportunity to accommodate 'a wide range of housing types to meet resident needs' and within the natural limitations of the area concerned.

We would be pleased to have an opportunity to present/discuss our submission further if that was available.

Nga mihi nui,

Adam Parkinson
Deputy Chair
CCRG.org.nz

Auckland City Centre Residents' Group

Submission to the Independent Hearing Panel on Auckland Council's Plan Change 78 to accommodate the National Policy Statement Urban Development

According to the Ministry for the Environment, the purpose of the NPSUD is about -

> ***Ensuring New Zealand's towns and cities are well-functioning urban environments that meet the changing needs of our diverse communities. It removes overly restrictive barriers to development to allow growth 'up' and 'out' in locations that have good access to existing services, public transport networks and infrastructure.***

CCRG's submission will be built around how effectively Auckland Council's decisions on changes to their Unitary Plan deliver what the RMA and the NPSUD were designed to achieve.

To measure this, we will focus our submission on achieving the **Purpose** of the Resource Management Act, the **Purpose** of the Local Government Act 2002 and delivery off the **well-functioning urban environments** defined in Policy 1 of the NPSUD.

Resource Management Act 1991 : Purpose

> *(1) The purpose of this Act is to promote the sustainable management of natural and physical resources.*
>
> *(2) In this Act, **sustainable management** means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—*
>
> *(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
>
> *(b safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
>
> *(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

National Policy Statement : Policy 1

> *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*
>
> *(a) have or enable a variety of homes that:*
>
> *(i) meet the needs, in terms of type, price, and location, of different households; and*
>
> *(ii) enable Māori to express their cultural traditions and norms; and*
>
> *(a) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
>
> *(b) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*

(c) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(d) support reductions in greenhouse gas emissions; and

(e) are resilient to the likely current and future effects of climate change.

Local Government Act 2002 : Purpose

The purpose of this Act is to provide for democratic and effective local government that recognises the diversity of New Zealand communities; and, to that end, this Act—

(a) states the purpose of local government; and

(b) provides a framework and powers for local authorities to decide which activities they undertake and the manner in which they will undertake them; and

(c) promotes the accountability of local authorities to their communities; and

(d) provides for local authorities to play a broad role in promoting the social, economic, environmental and cultural well-being of their communities, taking a sustainable development approach.

As the Auckland city centre is a relatively small space, we will also confine our comments to this area and the surrounding suburbs. We want to start with some scholarly articles about other world cities/ research in order to provide perspective to our submission, and to show that urban densification is not a New Zealand government one-off knee jerk reaction – it is happening all over the world!

The World Bank has this to say about Urban Development –

Globally, over 50% of the population lives in urban areas today. By 2045, the world's urban population will increase vy 1.5 times to 6 billion. City leaders must move quickly to plan for growth and provide the basic services, infrastructure, and affordable housing their expanding populations need. With more than 80% of global GDP generated in cities, urbanization can contribute to sustainable growth if managed well by increasing productivity, allowing innovation and new ideas to emerge. However, the speed and scale of urbanization brings challenges, including meeting accelerated demand for affordable housing, well-connected transport systems, and other infrastructure, basic services, as well as jobs, particularly for the nearly 1 billion urban poor who live in informal settlements to be near opportunities.

From The Building & Cities website - https://journal-buildingscities.org/articles/10.5334/bc.123

*Infill development is promoted by the European Commission through the no-net land take goal adopted in 2011 (**Science for Environment Policy 2016**). In practice, it means all developments on non-previously urbanised land should be offset by returning brownfield sites back to a natural state before 2050. It acknowledges the need to limit the urban encroachment on land to ensure sufficient land is provided for other purposes (*e.g. *agriculture, forestry, ecosystem services, biodiversity,* etc.*). This constitutes an important paradigm shift in the field of urban planning: land is now considered as a non-renewable resource, and therefore needs to be processed in a circular, closed-cycle approach, rather than in a linear, open-cycle one (**Preuß & Ferber 2008**). This no-net land take policy has been gradually adopted by several member states and/or European regions, with different thresholds, time horizons and trajectories. Its implementation will require the densification of existing urban areas to accommodate new households, new economic activities and new infrastructures.*

From the International Journal of Justice and Sustainability : Volume 22 : Issue 22 - https://www.tandfonline.com/doi/full/10.1080/13549839.2022.2034769.

> *In this paper, we will delve into a somewhat unexplored element of urban densification – namely, people's emotional responses to physically and socially densified neighbourhoods. Undoubtedly, there is a vast amount of scholarship on the advantages of dense and compact environments over urban sprawl. While scholars tend to highlight the environmental benefits, few studies scrutinise how people living in areas marked for intense urban development respond emotionally to densification strategies. Interviews with residents from urban neighbourhoods in Oslo demonstrate that densification can evoke emotions like insecurity, fear, anger and sadness over lost homes or altered place identity. This gap in scholarship calls for stronger academic and political engagement with people's feelings about their urban surroundings, also when discussing the social dimension of sustainability*.

A second article from the Buildings and Cities website - https://www.buildingsandcities.org/journal-content/special-issues/urban-densification2.html https://doi.org/10.5334/bc.70
Urban densification and social capital: neighbourhood restructuring in Jinan, China
X. Li & M. Sunikka-Blank- https://doi.org/10.5334/bc.70

> ***Policy relevance:*** *This research reveals the unintended impacts of urban densification on neighbourhood social capital and the division between 'stayers' and 'newcomers', underlying the importance of social sustainability when planning urban restructuring projects in China. Three recommendations are made for policymakers. First, residents' lived experiences and social impacts are vital for planning urban restructuring. The utility of urban spaces can generate social capital, which improves the social sustainability of the project. The courtyard house typology encourages more outdoor activities and social interaction than the high-rise typology. Decisions made at the neighbourhood level and about density will impact the local residents. Second, the categories of 'stayers' and 'newcomers' can be used to better understand the diversity of practices and neighbourhood social capital, instead of limiting to demographic indicators, e.g. income levels. Third, residents' appreciation of the gated communities makes it more difficult to implement the current government policy of opening the gates.*

Walkable Catchments:

Auckland has one of the most favourable climates and landscape for walking. The average midday winter temperature in July is 14c and at night 7c. In summer the average midday temperature is 24c and nights 16c.
This indicates that active transport modes need to be promoted by central government and local authorities for sustainability, health and climate benefits.

To support this, walkable catchments need to be the same distance all over Auckland and be considerably larger than cities like London, whose climate is far less favourable for active transport. Compared to Auckland the average London midday winter temperature in July is 7 degrees and at night 2c. Summer is very similar to Auckland at 23 during the day and 15 at night. As a comparison, for transport purposes the walkable catchments in London is 8 minutes/640 metres walk for buses and for trains 12 minutes and 960 metres.

We note Auckland Councils comment that '*A larger walkable catchment for the city centre is proposed because it has the greatest number of jobs and the greatest concentration of activities and amenities'.* To be as polite as possible, CCRG can only describe this statement as nonsense. The length of a walkable catchment for transport purposes has nothing whatsoever to do with the number of jobs, activities or amenities that exist in a particular area – all citizens capable of walking should be treated in exactly the same manner in terms of the distance they are expected to walk.

For simplicity and consistency, CCRG are of the view that standard Walking Catchment distances should be applied across all of Auckland. Based on the comparison with London's climate, we believe the recommended 1,200m from the city centre zone, 800m from a Metropolitan zone is far too short. In a city of just 1.7m people, there is no justification for three different walkable catchments with three different walkable distances.

CCRG consider that a standard 2,000 metres is a more appropriate walkable catchment length applied across all areas of Auckland. This requires an average walking time of just 20 minutes and, for benefits related to health, the environment and accessibility to public transport we believe this is a more appropriate, and defendable distance, for Auckland.

CCRG recommend to the IHP that walkable catchments be a standard 2,000 metres across all of Auckland including the city centre.

Auckland City Centre Zone – proposed Unitary Plan Changes

From Auckland Councils website, we are advised that the following Unitary Plan changes will be made to the city centre zone to accommodate the NPSUD requirements. For ease of reference, our comments will follow each of the proposed changes.

> • Removal of the Floor Area Ratio (FAR) standards. These standards currently manage site intensity and the scale of development in the city centre. FAR varies throughout the city centre but typically allows for greater development capacity in key areas. Removing the standards will provide developers with more flexibility in building design but still within the constraints of other standards such as tower dimensions and set back controls.

CCRG understand the need for these changes and agree that the FAR's are contrary to the NPSUD objectives so should be removed in their present form. We note, and congratulate Auckland Council, for the constructive manner that the FAR provisions have been implemented in the city centre which has resulted in a very large number of public benefits to residents, visitors and workers who use our city centre streets daily. In particular, the shortcuts between streets, and particularly those of different heights, has made navigating the city centre much easier for pedestrians, and more specifically the young, disabled, parents with prams and the elderly.

CCRG would recommend to the IHP that provisions be made in the Unitary Plan for future developments in the city centre that provide for Resource Consent conditions to include public benefits within, and beyond, the envelope of a particularly building and that this process/methodology be used for negotiation with developers in terms of the type and extent of a particular development.

> • Amendment of the general height control. This will enable:
> ♣ unlimited building heights in the core city centre except where special height controls apply;

♣ heights up to 72.5 metres across the city centre, except where special height controls or other qualifying matters apply.

CCRG are supportive of unlimited height limits in the city centre but we would recommend to the IHP that specific changes are incorporated into the Unitary Plan so as to facilitate Auckland Council having the decision making authority as to the height, dimensions and form of different buildings, in different locations, spread across the city centre space, and including public benefits/space, sustainability and climate change initiatives together with traffic/transport considerations as considered appropriate by Council on a site by site basis.

• Changes to current standards (and some new standards) to ensure that tall buildings are of a form that fits the context of our city.

As with the previous proposed change, CCRG are supportive of this approach BUT we are not convinced that there is any general consensus or understanding of what the 'context of the city' means. These are not descriptions found in any of the key documents referred to at the start of this submission so we would recommend to the IHP that the phrase **'…are of a form that contributes to a well-functioning urban environment as determined on a site by site basis'** is more appropriate phrasing.

• Removal of the FAR bonus standards. These standards allow transfer of additional floor space between sites and buildings. However, all sites will have greater height and/or development capacity and so the transfer of floor space is no longer needed. What is proposed to stay?

Supported.

• The need for all new buildings in the city centre to go through the resource consent process. This process enables good design outcomes to be achieved for city centre buildings.

Totally supported. This provides for Council to give effect to the Purpose of the Local Government Act (d) "*provides for local authorities to play a broad role in promoting the social, economic, environmental, and cultural well-being of their communities, taking a sustainable development approach".* Auckland Council utilising this provision to its maximum extent will ensure that the very best outcomes are achieved for our city centre *as suggested in the previous two comments.* This is also particularly critical in terms of all residential properties having balcony/patio provisions to ensure a very high quality living environment for residents.

• The special height controls. These controls are important for limiting building height where certain things need to be protected. For example, a special height control is in place around Albert Park to ensure sunlight into the park.

CCRG supports this statement on the basis that it provides for special height controls within the entire city centre. We would expect to see for instance, the highest buildings located along the SH1 corridor so as to minimise shading to other city centre and surrounding properties. In addition, podium developments, narrowing as the height increases, also ensures maximum sunlight to all residential homes in the city centre. However, it needs to be Auckland Council who makes these decisions on a site by site basis given that Placemaking is the key means of achieving the Purposes of the Local Government Act 2002.

• Controls that set minimum dwelling size and minimum floor to ceiling ratio. It is important that we maintain these controls to ensure that dwellings are of an acceptable size for residents.

Supported. CCRG are of the view that previous standards for apartments in our city centre are totally inadequate so, to achieve the purpose of the NPSUD Policy 1, we expect that high quality natural ventilation is also provided to all dwellings within the city centre.

• The outlook control, to ensure light, outlook and privacy for dwellings.

Supported. We expect automatically that sunlight is included in these outlook controls as Council has advised it intends to enforce for areas surrounding the city centre. We all know that New Zealand law does not provide for some individuals to have more rights to sunlight, daylight, outlook and privacy than others. City Centre residents expect their council, and governments, to ensure that the same rights apply to every residential area across all of Auckland and that Council will ensure this is respected through adherence to, and application of, Policy 1 of the NPSUD.

• The maximum tower dimension, setbacks from the street, and tower separation distances are being kept and extended.

Supported subject to comments provided above in terms of ensuring a quality living environment for city centre residents.

• City centre precincts will continue to be managed with area specific outcomes, including height and development capacity.

Supported subject to earlier comments.

Special Character Areas : https://charactercoalition.org.nz

CCRG are aware of, and concerned with, the enormous amounts of time, effort and ratepayer funds that have been allocated by Council for the purpose of protecting what is essentially a Unitary Plan myth – Special Character Areas. We all know that some of these would, and probably should, have qualified for listed heritage protection had the properties been in a heritage state. Instead, the vast majority of them have been heavily modified and no longer bear any resemblance to something that qualifies for heritage protection.

In a similar vein, there is ample research across the globe to prove that a reliable and affordable public transport system is heavily dependent on the density of population in the suburbs surrounding a city centre. This is exactly the same spaces that Auckland Council suggests we should be protecting from development, and, where development is proposed, it be limited to terrace housing. Surely these are also the areas where we need to incorporate mixed-use developments into the catchments, i.e. allowing light commercial developments like shops and cafes underneath new apartment developments.

Auckland does not need 1,400 hectares of land surrounding our city centre closed off as some sort of reservation – it is an anathema to good planning and is contrary to the Purpose of the Resource Management Act 1996, the Local Government Act 2010, Objective 1 and Policy 1 of the NPSUD and Council's own Transport Emissions Reduction Plan (TERP) document - https://ourauckland.aucklandcouncil.govt.nz/news/2022/09/terp-auckland-s-drive-to-drive-less.

As the Auckland Character Coalition website advises –

> *It is clear that many more homes need to be built for our people but it is the how and where that is crucial. There are three things that make Auckland a unique city – the Waitemata harbour, the volcanic cones, and the old kauri suburbs. These give the city its identity, they make it different from every other city in the world.*

While CCRG respect the rights of all citizens to hold differing views, and to be engaged with decisions councils and governments make, we have very rarely seen comments referring to Auckland's *identity and uniqueness* without reference to Tangata Whenua. This suggests either historical ignorance or a very high level of interest associated with asset protection rather than any concern over genuine heritage protection.

We also bring to the IHP's attention, that Policy 1 of the NPSUD makes specific reference to the standards quoted as being MINIMUM REQUIREMENTS. What Auckland Council are proposing in Plan Change 78 related to the protection of SCA's, are not MINIMUM REQUIREMENTS by any measurement – they are, from every perspective, in breach of most Objectives and Policies of the NPSUD. This is particularly concerning given that SCA's are not a requirement of any urban planning or heritage legislationThey are instead the epitomy of NIMBYism – a well-known phobia that is largely responsible for the current lack of proper, quality housing for all New Zealand citizens. Every New Zealand property owners, include the above, has the option of selling or retaining their property. If a group of property owners on one street decide that they want to keep their street like it is, they are free to do so. Nobody needs a special area created for those decisions – New Zealand law already provides this freedom of choice.

It needs to be noted that there are some 85,000 villas in New Zealand and a vast number of bungalows. Very few of the houses within the SCA's are unique, they are common all over Auckland and New Zealand. In addition to the somewhat abbreviated history of Auckland in the above quote from the Character Coalition, reflection also needs to be made in terms of where the land came from for these SCA homes to be built in the first place in terms of Objective 5 of the NPSUD. We also want to make it clear that we are totally supportive of genuine heritage protection as outlined in the Heritage New Zealand Pouhere Taonga Act 2014 and implemented by Heritage NZ – www.heritagenz.org.nz

Our recommendation to the IHP is that Auckland Council be required to accommodate maximum MDRS and mixed use developments in all of the surrounding suburbs of our city centre and that, for the purposes of giving effect to the NPSUD Objectives, Special Character Areas are not a Qualifying Matter under clause 3.32 or 3.33 of the NPSUD.

Qualifying Matters

Auckland Councils work to accommodate the NPSUD requirements, along with amendments to its Unitary Plan, are been heavily influenced by the 'out' clauses contained in various sections e.g. 3.32 (h) of the Qualifying Matters references in the NPSUD. CCRG have been informed, unofficially, that these clauses were purposefully incorporated into the NPSUD legislative changes to accommodate the 'protection' of Special Character interests.

Be that as it may, clause (33.2 (1) (h) in particular has created a constant New Zealand wide battle field between governments statutory intentions and councils willingness to accommodate them. Non-

specific, open ended legislation is not helpful to anyone and, in this case, mitigates against achieving the outcomes and intent of the NPSUD.

CCRG would recommend to the IHP that Auckland Council relying on Section 3.32 (h) as a means of preventing developments in SCA's is in breach of both the objectives and intention of the NPSUD i.e. ***Council has failed to remove overly restrictive barriers to development to allow growth 'up' and 'out' in locations that have good access to existing services, public transport networks and infrastructure.***

All current SCA's have access to existing services, public transport networks and infrastructure so exactly the right conditions exist for various MDRS options depending on location. CCRG accept, and understand, that at any given time there may be limitations placed on where/when development takes place, in terms of the timing of various infrastructure limitations/upgrades. However, this is never a reason to not build houses, it is only a reason to plan for when housing development takes place.

Auckland Light Rail Corridor

CCRG are surprised and disappointed that Auckland Council have chosen to not incorporate the proposed ALR area into their deliberations and decisions required under the NPSUD. CCRG are of the view that this is a serious omission on behalf of Auckland Council and needs to be rectified. Irrespective of whether/what/where/when/if this project proceeds, Council still has an absolute duty to include all land within their boundary in their current NPSUD response decisions.

CCRG recommend to the IHP that Auckland Council be required to incorporate the land in Map 1 showing the Auckland Light Rail corridor (white area) into their current NPSUD so that decisions related to progress on the ALR corridor are supported by appropriate area maps showing intensification, zoning, walkable catchments and the required level of intensification around city, metropolitan and local centres. We accept that the ALR project may change some of these but that is the case with all land – very few things remain unchanged consequent to urban developments.

……

[redacted]
Chair CCRG
www.ccrg.org.nz
[redacted]

Future Development Plan 2023 #7859

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

Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

Please see attached submission

Accessible local centres

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

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

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

Tell us why

As per our attached submission

- The Council should support a planned approach to the location, scale and pace of residential intensification in existing urban areas. In addition to targeting more intense residential housing developments to locations in close proximity to transport hubs, the Council should

mandate through the FDS and PC78 a deliberate, locally planned, consultative and staged approach to development in areas where the MDRS applies.

- Planning of intensification around transport hubs should encompass not only transport infrastructure, but also stormwater and wastewater. In addition, such planning should not be limited to transport hubs, but should also be used in respect of town centres and suburban neighbourhoods to ensure adequate infrastructure, and community engagement in local planning. If such infrastructure is not planned for, or is not able to be funded, then the area concerned should not be zoned for intensification.

Avoiding hazards

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

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

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

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

Agree

Tell us why

Please see our attached submission

Resilient infrastructure

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

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

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

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

Other

Tell us why

We agree, but this local focus should not be at the expense of larger scale responses to climate change

Other feedback

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

Please see our attached submission

#7859

Auckland Future Development Strategy 2023-2053:

Submission by the South Epsom Planning Group (Inc) on the consultation draft

26 July 2023

Introduction

The South Epsom Planning Group ('SEPG') has been involved in Auckland planning since 1972, particularly with regard to matters relating to Epsom, Mt Eden and Three Kings. We have been extensively involved in various proceedings associated with the preparation of Precinct, District and Regional plans, and with the Auckland Unitary Plan. We have also contributed a local perspective to national policy and legislation, and most recently Select Committee consultation on what is now the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 ('the Act'), and the associated National Policy Statement on Urban Development ('NPS-UD') and Medium Density Residential Standards ('MDRS'). Together these provide the legislative framework for current work by Auckland Council on Plan Change: Intensification ('PC78'), and now on its Future Development Strategy ('FDS') and Long Term Plan ('LTP').

This submission from SEPG on the draft FDS focuses on urban residential intensification, and on matters directly or indirectly impacting on our communities of particular interest (Epsom, Mt Eden and Three Kings). Our recommendations are presented in each section, and also consolidated in the Appendix.

SEPG wishes to be heard in support of our submission.

1. Strategic planning in a dynamic environment

Strategic planning must consider and respond to uncertainty, particularly when the planning horizon is very long – 30 years in the case of the FDS. The draft FDS notes the many uncertainties and significant challenges in the Council's operating environment. These include the following pressures, which will have both short- and longer-term impacts:

- Population change – rapidly changing inward and outward migration patterns following opening of New Zealand's borders that were closed during the COVID-19 pandemic, and Government policy responses to workforce shortages
- Climate change impacts and risks – the Council's assessment and recovery work is still underway in response to the floods and land slips linked with the extreme weather events of Auckland Anniversary and Cyclone Gabrielle, and the subsequent high rainfall events
- Financial – the Council's communities are struggling with cost inflation, interest rate increases, property rate increases, and property price fluctuations. The Council as an organisation faces particular challenges in respect of the affordability of climate change remediation measures, budget deficits, and high debt levels

- Government policy – including climate change commitments, resource management reform, and 'affordable water' (formerly '3 waters') reforms
- The upcoming election – significant policy differences between the two main party groupings in areas that will have a major impact on Council priorities and planning, including the above policy areas, together with transport matters such as light rail, location of the port, and wider transport planning.

We note also the scenario planning approach used by the Council in the draft FDS. We have reviewed this in detail in the FDS Evidence Documents. In our view, the draft FDS does not clearly explain:

- The differences between the scenarios, and the assumptions that underpin the scenarios (some consistent across all scenarios, and some variable)
- Why a preferred scenario was not selected for the FDS and how the set of planning principles emerged instead
- How these principles were then reflected in the draft FDS. (We also question description of these as 'principles' – they read more as goals, strategic imperatives or design features.)

SEPG recommends that:

- The draft FDS should be much more explicit about the risks for the Council and its communities arising from the key operating environment uncertainties, and the planning assumptions and mitigations that underpin the draft FDS.
- A sensitivity analysis should be undertaken to allow greater understanding of the impact that such risks and assumptions could have on the viability of the FDS, and the degree of flexibility that will be available to the Council to respond to changing circumstances.
- The description and analysis of scenarios should be clarified to explain better their use in shaping the FDS.

2. Quantifying future housing demand and supply

Enabling spatial capacity to meet growing demand for residential housing is a key imperative for the Council's FDS. We note the useful distinction drawn in the draft FDS between 'plan-enabled' and 'commercially feasible' supply of land for residential development.

The Growth Evidence Documents explain that the Council has based its population forecasts on a mid-point between Statistics NZ's medium and high growth projections. However, this choice is not made clear in the draft FDS; nor is the rationale for it; and nor is the methodology for quantifying future demand and supply clearly described. Recent governmental changes to immigration settings have indicated how quickly immigration numbers can surge. The draft FDS would be improved by indicating better how Council will respond to such rapid changes in population growth.

SEPG welcomes the Council's affirmation that the current AUP enables far more residential dwellings than will be required during the next 30 years. However, we believe that inclusion in the FDS of a summary of the methodology and key findings from the analysis of future housing demand and supply is warranted by its fundamental importance for the relevance, credibility and viability of the FDS and the emerging PC78 and LTP.

SEPG recommends that:

- The FDS should include a commentary on why a tailored population projection has been adopted as the basis for Council capacity planning, and the key factors and assumptions which underpin that projection.
- The FDS should explain how the Council has translated the forecast demographic changes (such as migration, ageing, and ethnic diversification) into housing demand and supply requirements, while also factoring in capacity constraints related to (for example) climate change, natural hazards, volcanic view shafts, highly productive land, natural and built heritage, and adoption of special character as a qualifying matter. This is discussed in the Evidence Documents, but is glossed over in the draft FDS.

3. Well planned residential intensification, and containment of peripheral urban spread

Auckland is a growing city that requires additional housing stock of a variety of types and sizes to meet the diverse needs of residents. This will require some form of urban intensification, given the undesirability of excessive urban sprawl.

In previous decades, controls on the urban sprawl of Auckland established by the Auckland Regional Council (the 'Metropolitan Urban Limit') were loosened under pressure from Government, and replaced by the somewhat more permissive and flexible Rural Urban Boundary (RUB) of the current AUP. However, this approach was based on the incorrect assumption that the Auckland housing shortage was a result of insufficient supply of residentially zoned ('Greenfields') land. As is now better understood (and described in the draft FDS), the housing shortage is a result of a more complex array of demand and supply factors.

The Act shows a lack of insight into unique aspects of the Auckland situation and the reasons for delayed intensification. The planning of liveable, sustainable cities, and development of their infrastructure, requires an informed perspective that spans generations. In our view, the thinking underpinning the Act is flawed and reactive, and exemplifies a 'one size fits all' nationwide approach that is far removed from the realities of Auckland's situation. Constrained infrastructure, together with shortages of building materials and labour, have collectively conspired to slow, prevent or limit urban development. As a consequence of Government misdiagnosis and lack of insight, the features that make Auckland a liveable city (now and for future generations) are potentially at risk of being destroyed. The density provisions imposed by Government through the Act are now flowing through into both PC78 and the FDS. If that process continues these factors will over-ride elements of Auckland which have already been identified in the AUP as being worthy of protection.

SEPG broadly agrees with the Council's approach to intensification as described in the draft FDS – that most growth should be within the existing city boundaries and near the town centres, and that some restricted growth should be allowed at the city edges where this supports the overall Strategy and its goals.

However, SEPG is dismayed that Auckland Council's elected representatives voted to support the provisions of the Act, which now underpin the proposed PC78 and the draft FDS. This was despite strong evidence from Auckland Council's own analysis in 2021 that showed such legislation was not required – the AUP had already enabled approximately 900,000 new residential sites that were yet to be built on.

But instead of responding to the Act by explaining how it is inappropriate and unnecessary for Auckland, the Council has chosen to revise the AUP and draft the FDS in accord with the legislation. The Council has thereby accepted the flawed basis of the legislation and associated regulatory framework. In adopting this approach, Council is creating a new AUP that fails to recognise and respect the unique features of Auckland.

Aucklanders are increasingly anxious about the implications of residential intensification. Revision of the AUP in line with the Act and MDRS weakens the overlays which were developed very carefully by the Council in conjunction with the city's communities. These overlays responded to Auckland's special geological, environmental and historical features, while at the same allowing a level of residential intensification that would meet Auckland's future needs. The overlays also reflected Council's understanding of Auckland's infrastructure constraints.

Auckland residents' concerns are intensifying as we become more aware of the provisions of the new legislation and MDRS, and their flow-through into PC78 (and now the draft FDS). We find that we are losing our right to be notified of, and provide feedback on, proposed property development in our immediate neighbourhoods, particularly those provisions providing for three 12-metre buildings located close to our homes' boundaries. Auckland residents are also rightly highly concerned about the potential adverse impact of the predominant MDRS on the sunlight and privacy which we enjoy as part of a liveable and sustainable city.

Such concerns of Auckland residents have grown to the point that urban intensification is now a significant issue in this year's Election, and the two political groupings have opposing policy positions.

SEPG recommends that:

- The FDS should make it clear that while the FDS is based on the MDRS (as is legally required), this is not the Council's preferred approach. The Council and its communities continue to favour the existing AUP as the foundation for future development of Auckland. Being explicit about this matter is important given the political uncertainty of the current environment which surrounds the forthcoming parliamentary Election.
- Included within such an endorsement of the existing AUP should be maintenance of the special character areas as defined within the AUP, rather than the abbreviated and flawed form now proposed by the Council in the draft PC78.

4. Rushed planning processes are leading to flawed outcomes

In SEPG's submission to the Select Committee considering the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill, we expressed our concern at the undue haste of the Government's policy, drafting and consultation processes, and the increased risk this poses for poor legislative outcomes. This undue haste in turn flowed through to the Council's PC78 process, with constrained engagement on the proposed AUP changes over a period of only 3 weeks in April-May and 4 weeks in August–September 2022.

SEPG is pleased that the Auckland Anniversary Weekend weather event and Cyclone Gabrielle have led the responsible Minister to grant Auckland Council's request for a 12-month extension of deadline to 30 June 2024 for its response to the Act. As a result, the Council has extended the timeframe for development of PC78.

This extension is intended to now allow time for the Council to undertake further work to better understand natural hazard risks and impacts, refine the analytical foundation for planning, and identify the changes to current land use that are required. These enhancements can be included in the final FDS and supporting plans (such as PC78). For this reason, we encourage the Council to not rush the current FDS development process, ensure it is developed in a rational planning sequence, and ensure it reflects the new understandings of natural hazards and their impact on both current and future land uses. Remediation of current climate change and natural hazard impacts will have significant direct and indirect implications for the Council's financial and intensification planning. However, the draft FDS includes little discussion of this important matter, but instead focuses largely on constraining new housing development because of such immediate hazards as flood plains, soil instability, fault lines, and liquefaction.

SEPG recommends that:

- The Council uses the 12-month extension granted by Government to move its planning into a rational sequence. As we understand it, the Council's current sequence is zoning changes (via PC78), then preparation of the FDS, and then drafting of the Long Term Plan ('LTP') and associated budget. We suggest that the FDS and LTP should be developed in tandem, enabling alignment of strategic planning and long-term budgeting. Without such alignment, the Council risks 'cart before horse', with the FDS likely to remain aspirational and disconnected from resource allocation. Without this change, the Council's LTP process will struggle with funding for long-term infrastructure. Instead, the LTP's issues and constraints should be considered before or concurrent with development of the FDS, and zoning changes should follow.
- The Council should ensure its planning processes (including for the FDS and PC78) retain the flexibility to respond to nationally-led policy initiatives during the remainder of 2023/24, including any new policies that may emerge as a result of the forthcoming Election.

5. A planned approach should be taken to intensification of both new and existing urban areas

In developing the proposed PC78 and draft FDS, Council officers have sought some improvements within the Government's legislative and regulatory framework in order to respond to Auckland's unique circumstances, and to mitigate the adverse impacts of the nationwide Tier 1 approach. These improvements include the draft FDS's identification of areas that, while already zoned for intensification, are not suitable for this because of constrained water, wastewater or sewage capacity, or natural hazards.

Furthermore, considerable effort has gone into developing, applying and refining a methodology for identifying and assessing residential areas to be covered by the special character qualifying matter provisions of the Act. The Council intends that this ensures their protection through inclusion in a new low density residential zone. SEPG has been actively involved in this work, both directly with Council officers and through the Character Coalition. As noted earlier in our submission, we consider that the Council's FDS should differentiate between special character qualifying matters that respond to Government legislation, and its preferred special character demarcation as presented in the AUP.

In addition, we note that through the draft FDS the Council is advocating for a planned, staged and integrated approach to new housing development to ensure best use of affordable infrastructure investment. Such an Auckland-wide, Council-led approach to <u>new</u> residential (and business) spatial capacity growth is intended to avoid poorly coordinated private plan changes and developments,

and ensure that infrastructure design, investment and construction is better integrated and better matches housing demand.

SEPG considers that this same rationale should also be applied to development in existing urban areas. Planning of intensification rollout would support the Council's wider aspirations for 'quality compact' integrated development and climate change adaptation and mitigation, and avoid the ad hoc, unplanned pepper-potting of inappropriate small scale MDRS intensification that will otherwise occur.

For example, in SEPG's area of interest, the elevated areas of the Epsom neighbourhood were settled in the period 1880 to 1920. Much of this housing is of character and worthy of preservation under the proposed special character provisions. Yet the overlay coverage is patchy and fails to recognise the impacts which intensification will generate 'downstream' through the additional stormwater runoff. This aspect of intensification should be analysed carefully in setting the boundaries of the special character area through PC78; where appropriate, the overlay boundaries should be extended, ideally to match the existing AUP.

SEPG recommends that:

- The Council should support a planned approach to the location, scale and pace of residential intensification in existing urban areas. In addition to targeting more intense residential housing developments to locations in close proximity to transport hubs, the Council should mandate through the FDS and PC78 a deliberate, locally planned, consultative and staged approach to development in areas where the MDRS applies.
- Planning of intensification around transport hubs should encompass not only transport infrastructure, but also stormwater and wastewater. In addition, such planning should not be limited to transport hubs, but should also be used in respect of town centres and suburban neighbourhoods to ensure adequate infrastructure, and community engagement in local planning. If such infrastructure is not planned for, or is not able to be funded, then the area concerned should not be zoned for intensification.
- In the Epsom area, any proposed intensification should be analysed carefully in setting the boundaries of the special character area; where appropriate, the proposed overlay boundaries should be extended.

6. An overly permissive urban residential development process will have significant adverse impacts on Auckland's trees

An explicit aim of the Act and the consequent PC78 is to make most urban property development a permitted activity and thereby minimise the need for resource consenting. This means that the majority of property developments will not require any resource consenting process whatsoever and will need to comply only with the MDRS provisions. Amongst other consequences, there will be no safeguards for existing trees (other than the very small proportion that are scheduled as 'notable'), and no requirements for significant deep soil and tree canopy unless the developer wishes to exceed the zone specifications and decides to apply for a resource consent. This overly permissive environment then goes even further in PC78's requirement for the large majority of resource consents to be non-notified, and hence exclude neighbours and other community stakeholders from being able to submit on an intended property development.

The inadequacy of Auckland Council's protection of its current and future large trees is acknowledged in significant discussion in the draft FDS Evidence Documents (pages 27-29). This is in

turn reflected in a recommendation in the draft FDS that the AUP be revised to "strengthen protection of existing vegetation and encourage or require new planting and ecological connections". However, the draft FDS includes almost no other discussion or recognition of the critical role that the tree canopy and urban ngahere will play in Auckland's future sustainability.

SEPG recommends that:

- The FDS is strengthened to better recognise the Evidence Documents through greater focus on how "greening of the city" will be achieved through protecting and sustaining Auckland's unique urban ngahere, including greater protection for existing large trees, and stronger requirements for planting and maintaining new trees that will in time also become large. Enhancing support for trees would encompass those planted (currently, and through new planting) in parks and reserves, on road-side berms, and where residential and business properties are being intensified.
- Qualifying matters should include all current legal tree protection elements in the AUP so that these trees continue to require consent for removal / pruning.
- The Council commission urgent expert opinion on whether the MDRS and associated residential intensification zones have planning rules that ensure the viability of protection for canopy tree planting and growth, and protection of established large, mature trees, with the scope of this to include both landscaping specifications, and resource consent and notification requirements, including whether such trees should have the added protection of an enduring consent requirement and associated enforcement regime.
- In light of the increasing importance of large, mature street trees in mitigating the adverse impacts of urban intensification and climate change, the Council should take stronger action to:
    - Plant, protect and maintain such trees on street berms, in association with Auckland Transport
    - Require Vector to accelerate undergrounding of power lines in established urban streets (in addition to new subdivisions) to allow large trees to grow unimpeded into their natural form.
- The Council should make any other or further changes to PC78 and the FDS which are required to give effect to these changes.

The Society wishes to be heard in support of our submission.

Christopher Mules MNZM
President
South Epsom Planning Group (Inc)
[redacted]

Email: [redacted]
Mobile: [redacted]

Appendix: Consolidated recommendations from SEPG

Strategic planning in a dynamic environment

- The draft FDS should be much more explicit about the risks arising from the key operating environment uncertainties, and the planning assumptions and mitigations that underpin the draft FDS.
- A sensitivity analysis should be undertaken to allow greater understanding of the impact that such risks and assumptions could have on the viability of the FDS, and the degree of flexibility that will be available to the Council to respond to changing circumstances.
- The description and analysis of scenarios should be clarified to explain better their use in shaping the FDS.

Quantifying future housing demand and supply

- The FDS should include a commentary on why a tailored population projection has been adopted as the basis for Council capacity planning, and the key factors and assumptions which underpin that projection.
- The FDS should explain how the Council has translated the forecast demographic changes (such as migration, ageing, and ethnic diversification) into housing demand and supply requirements, while also factoring in capacity constraints related to (for example) climate change, natural hazards, volcanic view shafts, highly productive land, natural and built heritage, and adoption of special character as a qualifying matter. This is discussed in the Evidence Documents, but is glossed over in the draft FDS.

Well planned residential intensification, and containment of peripheral urban spread

- The FDS should make it clear that while the FDS is based on the MDRS (as is legally required), this is not the Council's preferred approach. The Council and its communities continue to favour the existing AUP as the foundation for future development of Auckland. Being explicit about this matter is important given the political uncertainty which surrounds the forthcoming parliamentary Election.
- Included within such an endorsement of the existing AUP should be maintenance of the special character areas as defined within the AUP, rather than the abbreviated form now proposed by the Council in draft PC78.

Rushed planning processes are leading to flawed outcomes

- The Council uses the 12-month extension granted by Government to move its planning into a rational sequence. As we understand it, the Council's current sequence is zoning changes (via PC78), then preparation of the FDS, and then drafting of the LTP and associated budget. We suggest that the FDS and LTP should be developed in tandem, enabling alignment of strategic planning and long-term budgeting. Without such alignment, the Council risks 'cart before horse', with the FDS likely to remain aspirational only, and disconnected from resource allocation. Without this change, the Council's LTP process will struggle with funding for long-term infrastructure. Instead, the LTP's issues and constraints should be considered before or concurrent with development of the FDS, and zoning changes should follow.

- The Council should ensure its planning processes (including for the FDS and PC78) retain the flexibility to respond to nationally-led policy initiatives during the remainder of 2023/24, including any new policies that may emerge as a result of the forthcoming Election.

A planned approach should be taken to intensification of both new and existing urban areas

- The Council should support a planned approach to the location, scale and pace of residential intensification in existing urban areas. In addition to targeting more intense residential housing developments to locations in close proximity to transport hubs, the Council should mandate through the FDS and PC78 a deliberate, locally planned, consultative and staged approach to development in areas where the MDRS applies.
- Planning of intensification around transport hubs should encompass not only transport infrastructure, but also stormwater and wastewater. In addition, such planning should not be limited to transport hubs, but should also be used in respect of town centres and suburban neighbourhoods to ensure adequate infrastructure, and community engagement in local planning. If such infrastructure is not planned for, or is not able to be funded, then the area concerned should not be zoned for intensification.
- In the Epsom area, any proposed intensification should be analysed carefully in setting the boundaries of the special character area; where appropriate, the overlay boundaries should be extended.

An overly permissive urban residential development process will have significant adverse impacts on Auckland's trees

- The FDS is strengthened to better reflect the Evidence Documents through greater focus on how "greening of the city" will be achieved through protecting and sustaining Auckland's unique urban ngahere, including greater protection for existing large trees, and stronger requirements for planting and maintaining new trees that will in time also become large. Enhancing support for trees would encompass those planted (currently, and through new planting) in parks and reserves, on road-side berms, and where residential and business properties are being intensified.
- Qualifying matters should include all current legal tree protection elements in the AUP so that these trees continue to require consent for removal / pruning.
- The Council commission urgent expert opinion on whether the MDRS and associated residential intensification zones have planning rules that ensure the viability of protection for canopy tree planting and growth, and protection of established large, mature trees, with the scope of this to include both landscaping specifications, and resource consent and notification requirements, including whether such trees should have the added protection of an enduring consent requirement and associated enforcement regime.
- In light of the increasing importance of large, mature street trees in mitigating the adverse impacts of urban intensification and climate change, the Council should take stronger action to:
    - Plant, protect and maintain such trees on street berms, in association with Auckland Transport
    - Require Vector to accelerate undergrounding of power lines in established urban streets (in addition to new subdivisions) to allow large trees to grow unimpeded.
- The Council should make any other or further changes to PC78 and the FDS which are required to give effect to these changes.

Future Development Plan 2023 #7875

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Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

It is common sense. Some of the infrastructure is already in place fr such growth.

Accessible local centres

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

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

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

Agree

Tell us why

It just makes sense, to reduce long travel distances, if possible.

Avoiding hazards

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

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

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

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

Agree

Tell us why

Too much of existing growth has taken place in areas where there are significant environmental risks. This type of development should cease.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

This makes sense, but none of the rain gardens, swales, and detention basins drawn in your pretty pictures are on a scale to cope with changing frequency and intensity of rainfall.

Other feedback

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

Stop all further immigration until you sort out the infrastructure to cope with the immigration numbers. All current infrastructure appears overloaded. Trying to fix worn-out infrastructure, and trying to construct additional infrastructure is a tax burden and rate burden on the current population who already have an excessive rate and tax bill.

FEEDBACK ON FUTURE DEVELOPMENT STRATEGY

1. Introduction

1.1 This document is part of the Submission from Future-Kumeu Incorporated (F-K Inc) to Auckland Council on the Future Development Strategy (FDS). The FDS identifies where long-term development should occur.

1.2 F-K Inc was established in November 2022 by a steering group of like-minded Kumeu property owners, who proposed that a new and improved future plan be adopted by Auckland Council and the Supporting Growth Alliance.

1.3 Future-Kumeu Inc promotes the notion that future development, be it raised road-beds or raised rail-beds, along with further residential development, has no place on a low-lying floodplain **which is trapped between a heavy rail-bed and a flooding river.**

1.4 The mission of F-K Inc is to advocate that all future development be undertaken out of the floodplain.

2. Submissions to Current NZTA NoRs

2.1 In its submissions F-K Inc described its purposes thus:

a. to protect and promote the property and business interests of all Association members, to research and appraise all government policy decisions, NZTA decisions, and Auckland Transport decisions, as to the effect those decisions have on the North West area from Brighams Creek to Waimauku

b. to examine, specifically, but not limited to, the destructive effect of the proposed route for the proposed Rapid Transit Corridor, and promote alternative routes;

c. to research, explain and promote to the wider population the effect the Kaipara River/Kumeu River catchment has on the Kumeu township floodplain;

d. to promote and advocate to the wider community the consequences of any proposed government or local government planning proposals;

e. to advocate to central and local government that any future planning goals must not be to the detriment of the quality of life of the current residents;

f. to work with central and local government organisations to solve current problems, including but not limited to congestion;

g. to object to Auckland Council's Kumeu-Huapai Town Centre Plan, and to advocate for the creation of a new town centre which is not flood prone.

3. Future-Kumeu Inc endorses the Future Development Strategy

3.1 F-K Inc endorses the FDS insofar as it pertains to Kumeu and Huapai.

3.2 We support the removal of some parts of Kumeu, Huapai and Riverhead from future urban areas due to these areas not being suitable for development, for the these reasons:

i) · Significant hazard constraints, including approximately 30% of the future urban areas lying within a 1% annual exceedance probability (1% AEP) floodplain,

ii) Potential for higher vehicle kilometres travelled (VKT) and transport-related emissions compared to other future urban areas, due to distance from high quality existing public transport and services / employment.

3.3 Future-Kumeu Inc agrees and endorses that future urban areas within floodplains should be rezoned to non-residential uses. In the past 18 months, the Kumeu-Huapai and Riverhead areas have experienced three significant flood events that have resulted in extensive damage to homes and businesses. Avoiding further residential development in these areas in the future is prudent, in light of more frequent and impactful weather events occurring as a result of climate change.

3.4 F-K Inc also supports the removal of future urban areas within Kumeu and Huapai on the basis of insufficient infrastructure and services to support this growth. The Kumeu-Huapai area is experiencing significant congestion currently, as a result of already-consented residential development occurring without sufficient infrastructure. F-K Inc agrees that allowing development to occur within the future urban areas in the Kumeu-Huapai and Riverhead areas will result in higher VKT and transport related emissions.

3.5 Because of the above, Future-Kumeu Inc supports the plan changes to remove Kumeu-Huapai (in part) from future urban areas.

4. Conclusion

F-K Inc supports the removal (in part) of future urban areas in Kumeu-Huapai and Riverhead for the reasons stated above.

The Future Development Strategy aligns with many of the goals of Future-Kumeu Inc.

The Secretary,

Future-Kumeu Incorporated.

http://www.futurekumeu.nz/

Future Development Plan 2023 #7896

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Universal Homes has been building/developing on greenfields since 1959. Avondale was a greenfield. It simply provides for more affordable housing. You need to make use of the motorway network now in place and get on with enabling Future Urban land, so land prices do not rise during the next boom out of control. The RUB creates artificially high land prices which in turn makes housing more expensive.

Accessible local centres

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

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

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

Disagree

Tell us why

Up and out. Don' t cull one for the other. The market is stronger than what ideologists try and force consumers to do

Avoiding hazards

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

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

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

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

Disagree

Tell us why

Anything can be engineered out. Developers should be allowed to show you how they can mitigate or eliminate the risks. Plus you are predicting climate change (that is impossible, you cnat even predict the weather next week), and putting horrendous sea level rises assumptions in, with no legit evidence for it. A blanket approach is too simplistic.

Resilient infrastructure

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

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

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

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

Disagree

Tell us why

It depends. If you are saying everythign non nature based is out, then you are wrong. Nature based where cost-efficient and available. Non nature based if its required. Don;t let your ideology get in the way of a suitable practical solution. Plus, things are always changing, Nothing new is changing. Also fix the existing pipes, culverts and rainways.

Other feedback

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

Plenty.

Future Development Plan 2023 #7898

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

Tell us why

Accessible local centres

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?

Future Development Plan 2023 #7899

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

Disagree

Tell us why
See attached

Accessible local centres

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

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

Agree

Tell us why
Agree as part of a wider strategy

Avoiding hazards

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

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

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

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

Agree

Tell us why

Resilient infrastructure

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

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

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

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

Disagree

Tell us why

Nature based infrastucture is surely more achievable in Greenfields ares

Other feedback

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

See attached

#7899

Future Development Strategy Submission from Dines Group

31 July 2023

Dines Group opposes the plan to restrict further Greenfields development until up to or beyond 2050.

Introduction:

Dines Group entities and personnel have been involved in the development and construction of major projects within the greater Auckland area for over 50 years.

Background:

- Auckland Council went through a robust process in evaluating and implementing the Unitary plan. This document provided a balanced approach to future development in Auckland.
- What is now proposed severely restricts Greenfields development particularly given this restriction is based on a theoretical assessment of possible infill development that is simply not realistic.

Future Development:

A) Greenfields

- Limiting Greenfields development will inevitably cause an increase in housing costs.
- New development areas are better engineered to meet climate change requirements whereas major infrastructure upgrades are required to allow the level of intensification needed to meet housing growth targets. Replacing infrastructure in existing urban areas is many times more expensive than installing new infrastructure in greenfield locations.
- No Greenfields developments flooded in the Anniversary weekend floods, only inner city and potential Brownfields developments.
- Greenfields development allows through careful planning the zoning of industrial and business land to provide employment in adjoining areas.

- This enables community hubs to develop reducing transport requirements and associated emissions.
- This approach creates new and vibrant local communities.
- The infrastructure for Greenfields development is either paid for by developers who install it or it's funded through development contributions.

B) Brownfields

- Brownfields development creates a more intensive living environment which contributes to social and health issues. The spread of Covid has been shown to be greater in intensive residential areas.
- Doesn't address the shortage of zoned industrial and business land resulting in increased prices. This means doing business is more expensive and increases inflation and inequality.
- The infrastructure required for Brownfields development is far more difficult to assess and has led to major downstream effects. The Watercare Asset Management Plan 2021-2041 (page 102) acknowledges this where it identifies that infrastructure upgrades for brownfield locations are partly funded by Watercare whereas in greenfield locations this is not the case.

Other Effects

- Restricting Greenfields development will result in job losses and business closures in the land development industry. An entirely different set of skills is required for Brownfields development.
- Restricting Greenfields development appears to be just another way to reintroduce the old M.U.L. This will have the effect of driving up land prices causing even more social issues and inequalities.

Summary

We believe this Future Development Strategy is irresponsible and ideologically driven. It will result in poorer outcomes for Auckland including higher house and rental prices, unemployment, inflation, and business closures, while solving none of the issues it claims it will.

At very least the current proposal will create an unbalanced approach to planning Auckland's future growth and seems to have scant regard for good planning, housing growth targets and housing options.

This is disappointing as it appears to be driven largely by Auckland Council's current financial constraints.

The Unitary plan was a document that went through a vigorous and lengthy consultation process. This proposed change allowed one month, extended to two months for consultation!

This is simply outrageous so we strongly recommend the proposal be subjected to a robust hearing process.

Future Development Plan 2023 #7901

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Dear: Sir/Madam,

How are you?

We're writing to express our opinion in regarding the council's proposed updates to the FULSS (Future Urban Land Supply Strategy).

We would like to state that Auckland city's population is growing and expanding, therefore, there will be a need to have more dwellings to be built in the future.

It's important for Auckland council to take Kumeu for consideration for Future Urban in the next step, since Waka Kotahi NZTA is implementing solid infrastructures for example: light rail, and improvement like road widening on State Highway 16, Kumeu areas.

Most of the people we know enjoy living the Kumeu area and would like to have their friends living close by. But now there is not enough houses for rent or new housing developments for people to choose from.

We believe Auckland city is a super city that's world class and attracts people all over the world to immigrate to. In order to accommodate more people, Auckland city will need more land to build new housing developments. It's an inevitable progress and growing trend of Auckland City.

Accessible local centres

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

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

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

Disagree

Tell us why

Dear: Sir/ Madam,

How are you?

We believe that it's important to have more focus development and local centres in Kumeu to ensure the communities are more spread out. Kumeu has been a popular and long established area for people to work and to reside.

It's crucial not to only to focus development in or near CBD areas, because, these areas' space /land are limited and some of the infrastructures need to be upgraded. But, also focusing to putting Kumeu into the FULSS (Future Urban Land Supply Strategy), where there is land and space available for forward developments.
Thank you.

Avoiding hazards

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

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

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

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

Disagree

Tell us why

Dear: Sir/ Madam,

How are you?

Although we agree wit you that some of the areas like Waimauku is prone to flooding and sea-level rise. On the other hand, Kumeu is not the same case, therefore, Kumeu should be consider for the FULSS (Future Urban Land Supply Strategy).
Yours Sincerely,

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Other feedback

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

Future Development Plan 2023 #7903

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Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

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

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

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

Accessible local centres

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

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

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

Agree

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

Avoiding hazards

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

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

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

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

Agree

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

Resilient infrastructure

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

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

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

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

Agree

Tell us why

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

Other feedback

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

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

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

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

#7903

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

EVERY WETLAND COUNTS

HE PUIPUIAKI IA ROHE KŌREPOREPO

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

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


Wetland drainage canals, Te Puke. © Rob Suisted


Matuku-hūrepo bittern. © Neil Robert Hutton

#7903


Salt marsh, Marlborough. © Rob Suisted

WHAT'S HAPPENING TO OUR WETLANDS?

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

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

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

HEALTHY WETLANDS HEALTHY NATURE

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

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

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

HEALTHY WETLANDS HEALTHY CLIMATE

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

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

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

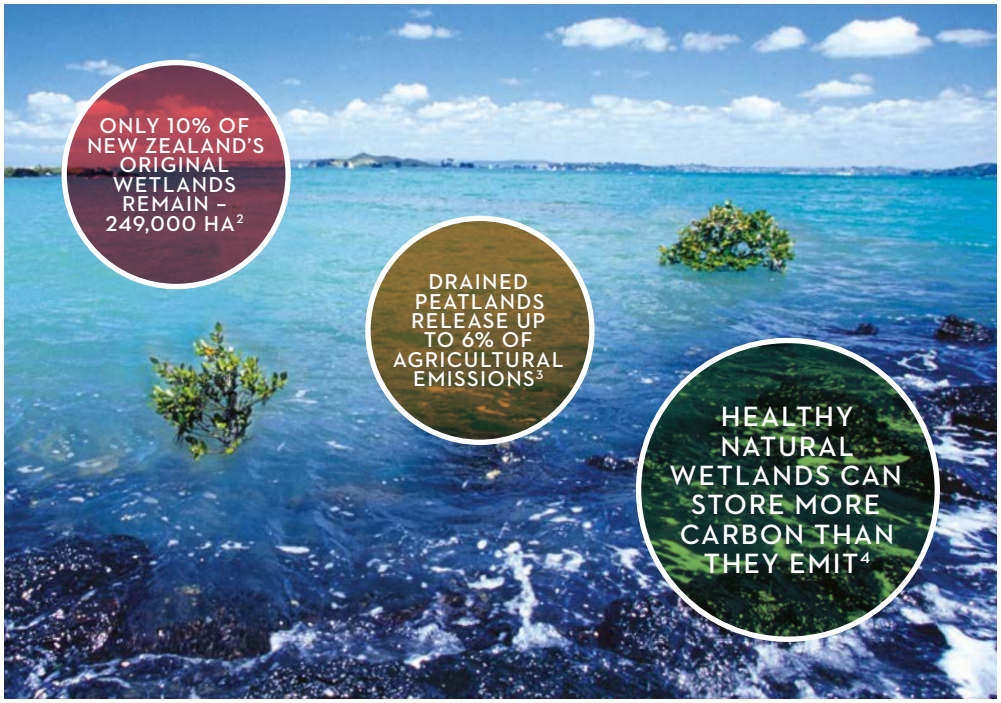
Coastal wetlands sequester carbon up to 57 times faster than a tropical forest.[9]

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

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

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

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



Mangroves, Hauraki Gulf. © Rob Suisted



Kahikatea swamp, Lake Brunner. © Steve Reekie

HEALTHY WETLANDS
HEALTHY COMMUNITY

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

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

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



Īnanga. © Rod Morris

SAVE OUR WETLANDS

#7903

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

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

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



Forest & Bird wetland planting project, Wainuiomata.

#7903

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



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

Every Wetland Counts © Published by Forest & Bird

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

Waituna Lagoon, Southland. © Shellie Evans

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

CHOOSE CLEAN WATER

Fish & Game NEW ZEALAND

NEW ZEALAND GAME BIRD HABITAT TRUST

Generation Zero

GREENPEACE

WETLAND TRUST

OraTaiao NZ Climate & Health Council

Public Health Association of New Zealand Kāhui Hauora Tūmatanui

Whitewater NZ

WWF

Future Development Plan 2023 #7909

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Your feedback

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

Tell us why

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.

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Tell us why

Avoiding hazards

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

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

Tell us why

Resilient infrastructure

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

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

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

Tell us why

Other feedback

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

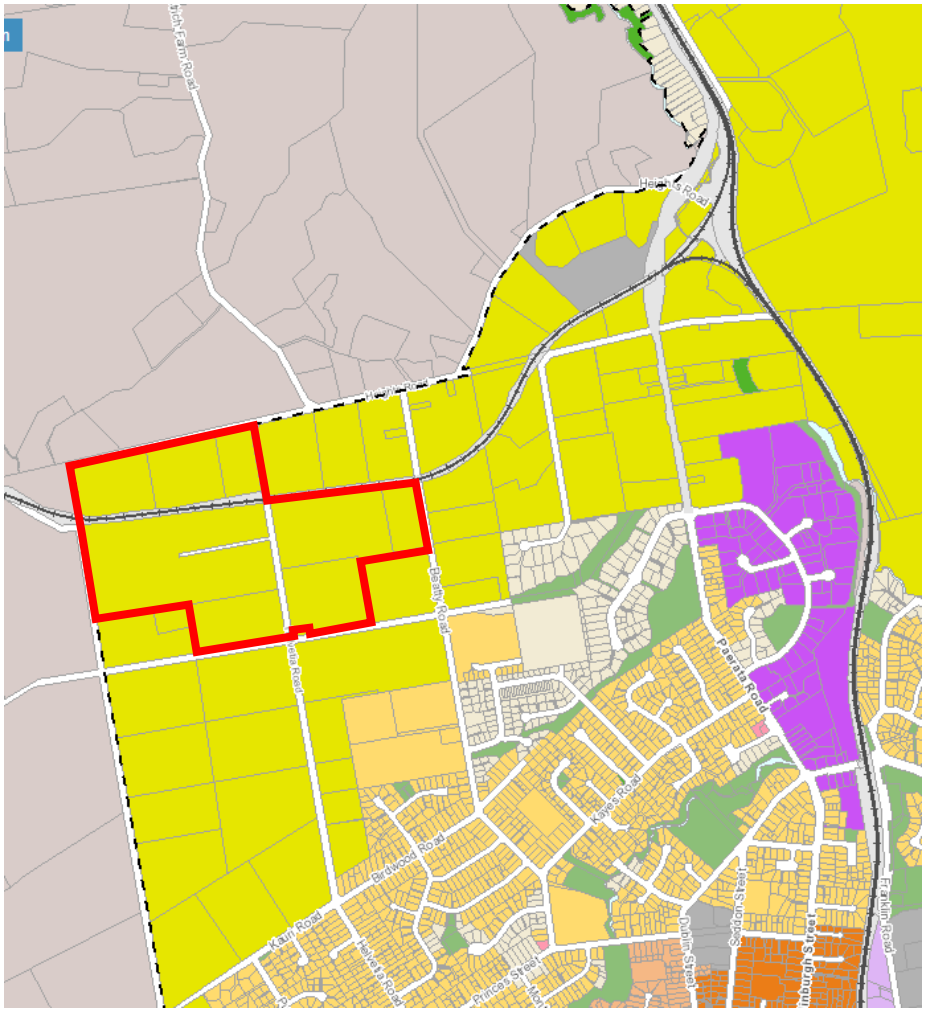
Submission on Auckland Future Development Strategy 2023-2053 (Consultation Draft: July 2023)

BALLE BROS FRESH PRODUCE LTD

HEIGHTS ROAD, PUKEKOHE

Balle Bros Fresh Produce Limited, own the following land parcels located in Pukekohe north-west

Legal Description	Record of Titles	Area
Lot 1 Deposited Plan 446622	562843	14.7566ha
Allotment 114 PSH of Pukekohe	NA56/49	4.0469ha
Lot 1 Deposited Plan 441202	549068	4.6660ha
Lot 2 Deposited Plan 201025	NZ129D/154	6.7368ha
Lot 1 Deposited Plan 201025	NA129D/153	2.0ha
Lot 2 Deposited Plan 446622	562844	3.7519
Pt Allotment 150 PSH of Pukekohe SBSC 2	NA756/211	4.0393ha
Pt Allotment 151 PSH of Pukekohe SBSC 2	NA2D/322	2.1221ha
		42.1196 hectares **total**



BALLE BROS HEIGHTS ROAD

1. The Pukekohe based Balle Group of companies specialise in growing, packing, processing and marketing high-quality fresh vegetables. We have been growing vegetables for four generations. In terms of production, we are geographically spread throughout the two main islands, growing a mix of vegetables including potatoes, onions, carrots, parsnips, cabbage, cauliflower, lettuce and broccoli not only for domestic but also export markets. We employ 300 staff on a full-time basis in addition to approximately 170 seasonal employees. Our headquarters is situated at Heights Road in Pukekohe alongside our main vegetable washing, packing and processing facilities. We own the parcels of Future Urban zoned land referred to in the table below. We welcome and value the opportunity to provide feedback and trust it will be given due consideration.

AUCKLAND UNITARY PLAN

2. The land has a Future Urban (FUZ) zoning in the Auckland Unitary Plan and is within the Rural Urban Boundary (RUB). The FUZ is applied to land that has been identified as being suitable for urbanisation through a range of methods including structure planning, spatial plan growth assessments and future infrastructure planning assessments.

3. Currently the land provides for a mix of rural support activities (although not isolated to) cool-stores, pack housing and ancillary ambient storage, transport and workshop facilities and large hardstand areas enabling the safe storage (to minimize fire risk) of empty field bins and machinery. It is contemplated that subsequent to live zoning that other complementary industries will gravitate to the site enabling critical mass and symbiotic activity supporting the surrounding community while providing employment opportunities close to where people live.

4. We have made land use decisions for this land based on the fact it is FUZ and within the RUB as proposed in the Auckland Unitary Plan 2013 and confirmed as operative in part Auckland Unitary Plan in November 2016. It has attracted market value based on that situation and we have been careful to manage investment into the land on the knowledge that the regional expectation is that it would support urban development.

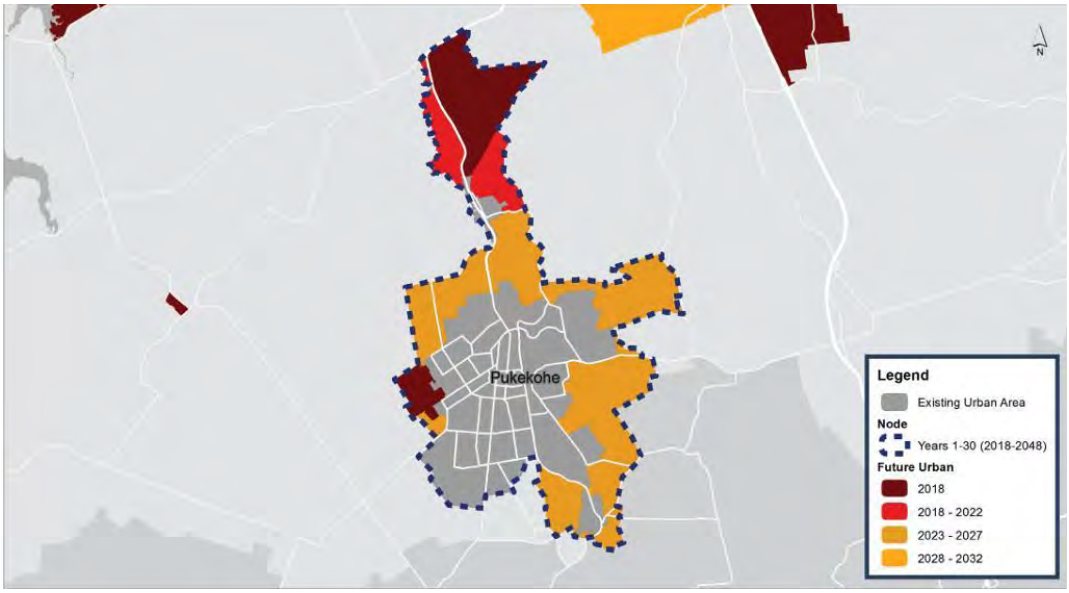
AUCKLAND PLAN 2050

5. The **Auckland Plan 2050** (a spatial plan) identifies Pukekohe as a "rural node" and a "satellite town" with the potential to accommodate up to 14,000 additional dwellings within approximately 1,700 hectares of future land around Pukekohe, including 790 hectares in Paerata. As a satellite town, the Auckland Plan expects that Pukekohe will: *function semi independently from the main urban area of Auckland*.

6. The Auckland Plan vision for Pukekohe will be implemented through the structure plan for Pukekohe and Paerata which refines the staging and timing of development and will identify the mix and location of housing, employment, retail, commercial and community facilities required.

AUCKLAND FUTURE URBAN LAND SUPPLY STRATEGY

7. The **Auckland Future Urban Land Supply Strategy July 2017 (FULSS)** identifies the site to be 'development ready' between **2023-2027.**



8. The FULSS states:

   Pukekohe is sequenced in the second half of decade one (2023 – 2027), excluding most of Belmont (Pukekohe) which is already live zoned. The early sequencing of Pukekohe will allow for the development of a comprehensive structure plan for the entire future urban area. A structure plan for the whole of Pukekohe will enable efficient and integrated land use and infrastructure solutions to be found.

9. Land is considered "development ready" once the following four steps are complete:
   1) Future urban zoned land in the Unitary Plan Planning phase;
   2) Structure planning completed;
   3) Land rezoned for urban uses; and
   4) Bulk infrastructure provided.

10. As discussed below the first two steps have been taken and progress is being made towards the urbanisation of northwest Pukekohe. The submitter has supported those steps and collaboratively worked with Auckland Council over a significant period of time, following the guidance of Council staff. The live urban zoning of our land sooner rather than later is the most efficient and effective way of achieving the growth management objectives of Pukekohe. Particularly in the regard to accommodating more employment opportunities closer to homes, reducing commuter travel.

PUKEKOHE AND PAERATA STRUCTURE PLAN

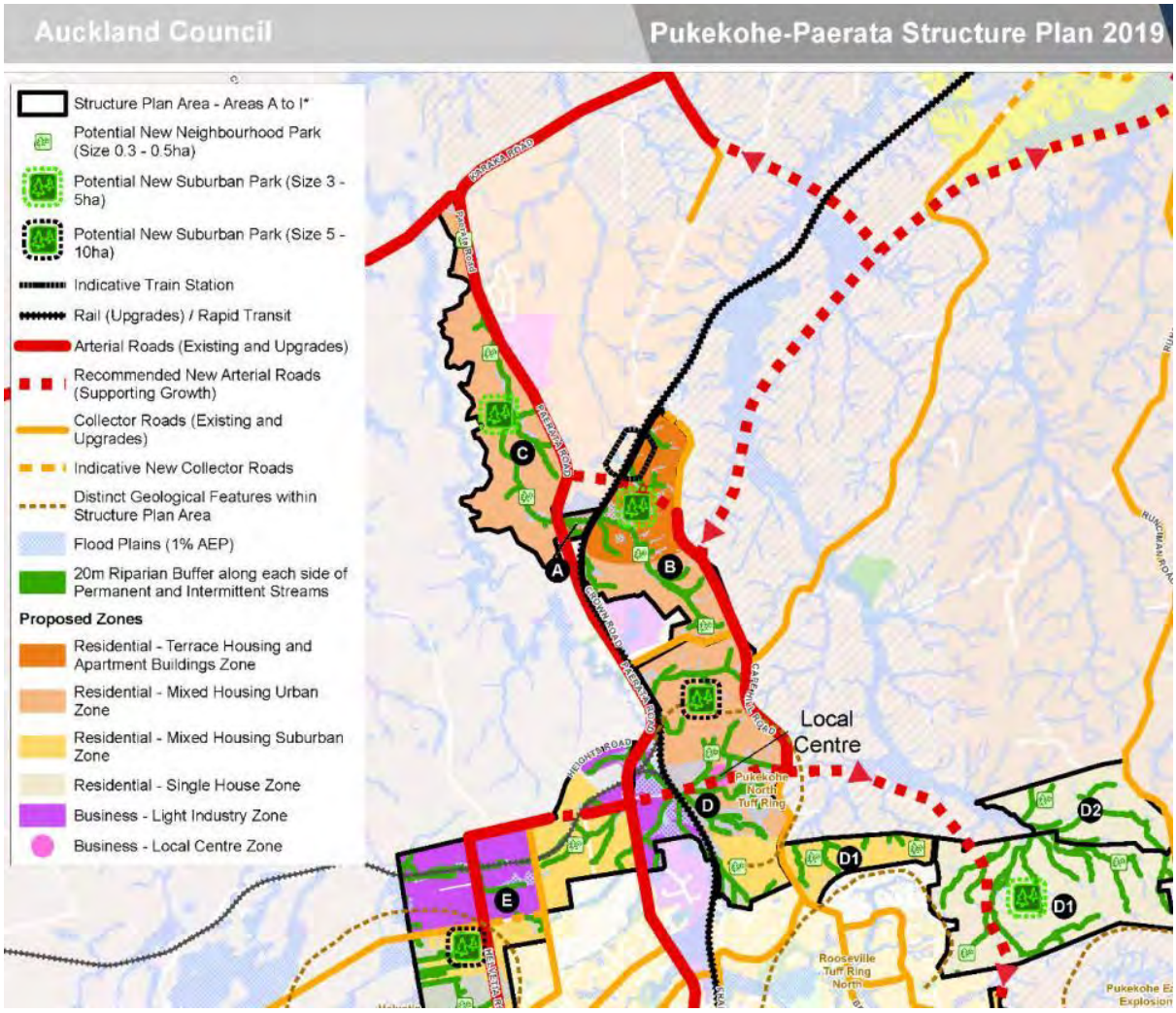
11. Auckland Council adopted the **Pukekohe and Paerata Structure Plan** on 6 August 2019. The Pukekohe-Paerata Structure Plan 2019 (Structure Plan) is intended to implement the strategic vision for the Pukekohe and Paerata area in the Auckland Plan 2050.

12. The Structure Plan has the broad goal of:

    New growth areas will enhance Pukekohe as a focal point and place to further support the surrounding rural economy. These areas will offer a range of housing choice and employment opportunities for people at all stages of life. It will be well connected to the wider Auckland and Waikato regions, while protecting and enhancing the natural, physical and cultural values that contribute to Pukekohe's unique character and identity.

13. The proposed Structure Plan Map identifies the submitters land as being within Area E – Pukekohe north-west, indicating proposed business land (Business - Light Industrial). The Structure Plan has indicated that Area E be rezoned for business land use on the following grounds:

- *The north-western and north-eastern corners of Area E are proposed to be zoned Business – Light Industry. This reflects the existing rural business operations in this area and the area's proximity to the railway line and northern road corridor in and out of Pukekohe*



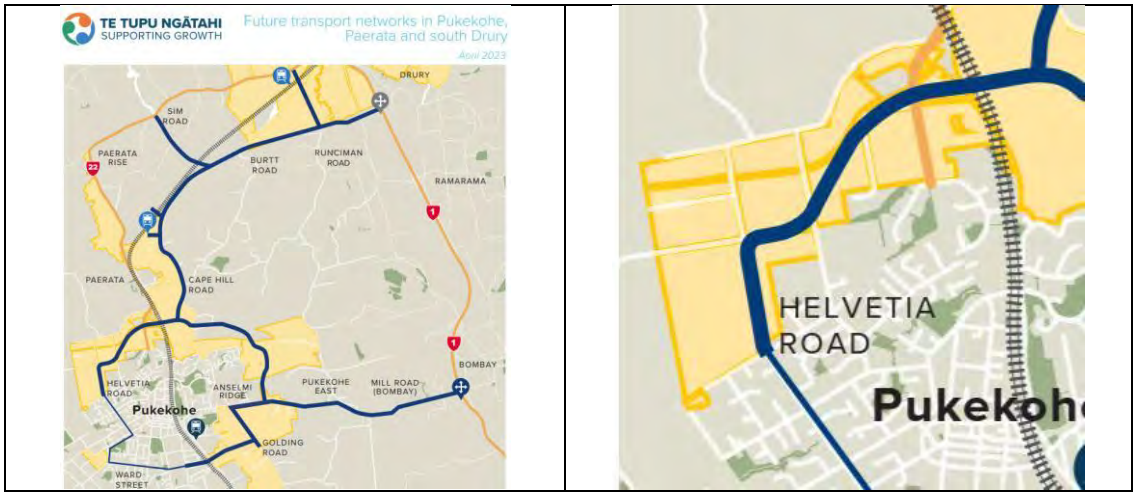
GIVING EFFECT TO THE FUTURE URBAN ZONE

14. **Private Plan Changes** have been submitted to rezone land within the Pukekohe Future Urban Areas.

15. Furthermore, the wheels are in motion to provide the required bulk infrastructure to support the growth of Pukekohe.

16. **Te Tupu Ngātahi | Supporting Growth (Supporting Growth Alliance**) are planning for the following transportation projects:
    - Rail upgrades and new train stations at Pukekohe Drury Central, Drury West and Paerata are currently under construction.
    - A new connection to improve safety and support the future movement of people and goods between the proposed Mill Road Corridor, State Highway 1 and Pukekohe town centre by providing an alternative route to State Highway 22; and
    - New urban arterials around Pukekohe scheduled for Notice of Requirements in late 2023.

17. As illustrated below the indicative location for the north-western arterial is adjacent to the Balle Bros Heights Road property. The western ring route is to reduce pressure on the existing networks in the centre, primarily for freight associated with horticultural activities located within the west, such as the Balle operations. Balle Bros have provided feedback during community consultation to ensure that proposed routes would be suitable for associated freight and heavy vehicle traffic.



18. The linkage further supports the need to give effect to growth outcomes and timings landowners and the community have knowingly planned for. Irrespective of the public nature of this infrastructural element, the private sector should retain the ability to deliver private plan changes in order to achieve the desired growth management outcomes. It is imperative that this aspect should not be left to Auckland Council alone.

19. As informed by other approved plan changes in the Pukekohe Area, the following required infrastructure has planned and/or progressing:
    - Construction of water reservoir.
    - Upgrades to the Pukekohe wastewater treatment plant, pump stations and expanded wastewater networks.

20. The Plan Changes have also been approved on the basis of the precincts including specific transport infrastructure triggers.

PROPOSED CHANGES

21. The confirmed zoning to FUZ of the submitters land under the AUP 2016, declared to the market a promise of urban development within a specific timeframe. People have made decisions and investments based on the FUZ zoning and while land values have reflected that zoning this has also notably been accompanied by significant rate increases. The proposed changes would have significant economic effects on landowners and undermine reasonable use and forward planning for their land.

22. The draft FDS which seeks to push the sequencing of growth for the submitters land to 2040+ (from 2023-2027), which undermines those previous commitments by Council and prevents certainty of the timely implementation of live zoning.

23. The proposed FDS, if adopted arguably will prove short sighted in the fullness of time by severely restricting all further greenfield development. This will have significant ramifications for Pukekohe, Paerata and hinterlands. Rather than infill brownfield being preferred over greenfield development, it is paramount that both options should remain in order to enable a coherent 30-year land release that provides certainty for developers. By limiting options and therefore market tension, land values would be set to increase to a level which would severely undermine affordability and choice. Master planned larger greenfield industrial development enables coherent development, with functional lot sizes and shapes, required integrated infrastructure and quality urban design outcomes.

24. The submitter questions whether sufficient analysis has been completed to determine if there is enough feasible development capacity, particularly in terms of industrial zoned land for Pukekohe which currently is in short supply. It is widely acknowledged that economic specialists often allude to the difficulty of estimating what actual future development capacity is, which is reliant on a myriad of interrelated changing inputs and assumptions (refer recent evidence for Plan Change 73-Private: O'Hara Waiuku). There is no debate that judicious access to Greenfield land has the ability provide significant development potential expeditiously. The capacity assessments informing the FDS should be broken down into subsets to reflect the separate urban environments rather than at regional scale or even sub-regional scale. This is particularly pertinent given the potential for Pukekohe to be semi-independent of the main centres. Therefore, a precautionary approach should be taken by the FDS to ensure sufficient development capacity is available on tap sooner rather than later to meet the expected demand.

25. Given the long lead times associated with development and coordinating infrastructure provision it is essential to provide in parallel for both greenfield and brownfield growth without delay. Funding and financing options to enable growth alone should not necessitate a protracted release of FUZ land. Furthermore, given already the commitment of infrastructure proposed for Pukekohe, a delayed timeframe for the live zoning of the FUZ on the periphery of Pukekohe on the basis of infrastructure provision, is therefore unjustified.

FDS PROCESS, IMPLEMENTATION AND INCORRECT ASSUMPTIONS

26. The FDS implementation approach signals a significant change to the long-embedded growth strategy landowners and agencies have worked towards giving effect to, which would inappropriately predetermine the outcome of future plan changes processes. The process to adopt the FDS is less formal and contestable than the RMA plan change process and is not supported by a robust, publicly available evidence base meeting the requirements of s32 of the RMA and able to be tested by affected landowners and other interested parties. At the very least there should be the ability for submitters to present at the Planning, Environment and Parks Committee prior to the adoption of the Strategy.

27. The FDS Identifies that 19% of the 91 plan changes to the AUP advanced since 2016 have been lodged within the Future Urban Zone, half of which were within locations out of sequence in

terms of the development readiness anticipated under the current FULSS. The FDS evidence report concludes that the past pattern of decision-making shows that the policy frameworks in the Regional Policy Statement of the AUP is not strong enough[1]. The FDS implementation consequently suggests the need to strengthen matters for assessing plan changes and that the "*sequencing strategy is embedded into the Regional Policy Statement. This will provide greater decision-making weight to the sequencing strategy on plan change applications*[2]*"*.

28. The submitter strongly opposes the suggested implementation that the FDS sequencing strategy be embedded into the Regional Policy statement and changes to the RPS which would prevent private plan changes in the FUZ or outside the RUB. The lack of contestability will seriously undermine the ability to achieve fair and just planning outcomes. Such changes would also be contrary to Policy 8 of the NPS:UD:

> *"Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:*
> *(a) unanticipated by RMA planning documents; or*
> *(b) out-of-sequence with planned land release."*

29. Such a suggested change would constrain growth similar to the Metropolitan Urban Limit being embedded in the Auckland Regional Policy Statement preventing private interests or the then district councils being able to give effect to the Auckland Regional Growth Strategy or Sector Growth Agreement. Sequencing is important but the ability for the private sector to advance private plan changes and question/change sequencing should not be prevented.

30. In 2016, the Auckland Unitary Plan Independent Hearings Panel (IHP) warned that the Future Development Strategy shouldn't be a method for controlling urbanisation process *as it would inhibit or even prevent meritorious proposals for greenfield development without a full assessment of those merits*[3]. We concur with the IHP that "*it is important that methods for providing land for urban development should be contestable to enable choices and reassure people and communities that restrictions on urbanisation will not result in an undersupply of land for urban purposes*[4]*".*

31. The draft strategy also makes the following statement:

> *1. Private plan changes severely undermine coordination:*
>
> *Future urban areas have come under increasing development pressure. Rather than the sequenced approach provided for through the FULSS, live zoning has come through private plan changes ahead of time. Up until the end of March 2023 10 private plan changes were fully operative in the future urban area. A number of other private plan changes are being*

[1] Appendix 1: Legislative, statutory and policy context of the overall evidence report
[2] Paragraph 49 Planning, Environment and Parks Committee 04 May 2023 Agenda Item 9
[3] Pages 9 and 10 IHP Report to AC Topic 028 Future Urban Zone 2016-07-22
[4] 5.1 Statement of Issue, Contestable methods of managing growth Page 8 IHP Report to AC Topic 028 Future Urban Zone 2016-07-22

processed with more expected. In effect, private plan changes are driving the strategy. This has removed any degree of certainty in sequencing and timing of growth and has forced the council group to become more reactive to ever changing priorities – both in the timing of development and the number and spread of areas being live zoned.

32. The statement is misleading. Rather than undermining coordination of growth, approved private plan changes on future urban zoned land, have consistently been determined to be the most appropriate means to achieving well-functioning urban environments which effectively is at the heart of the RMA. Such private plan changes facilitate a timely stream of development capacity and are a large part of the solution rather than the root of the problem. Ironically Auckland Council in fact relies on the private sector to pursue the live zoning of FUZ land as it does not have the resources and capacity to fund such plan changes. We reiterate the comment of the IHP that it is important that methods for providing for urban development remain contestable.

CONCLUSION

33. An exhaustive AUP process ensured that the submitters land was zoned FUZ. As such it was deemed suitable for urbanisation. A cohesive plan change proposal has been completed. Progress has been made to ensure that the land is "development ready" well within this decade. Delaying urbanisation to 2040+ would have significant implications on Pukekohe's ability to provide for reasonably expected development capacity, particularly in terms of the provision of light industrial zone land. The delayed release of greenfield land will impair the competitiveness of land and development markets. It is imperative that funding constraints in isolation should not necessitate the delayed release of FUZ land as there is a range of options to deal with that one impediment.

34. We are alarmed and concerned about the potential for FDS adoption process and strongly advise that its implementation will severely restrict the supply of land for urban purposes and prevent meritorious proposals for greenfield development without the benefits of a full and comprehensive assessment. We therefore seek that the FDS continues to support both greenfield and brownfield development to accommodate and not unnecessarily impede a sensible growth strategy.

Future Development Plan 2023 #7918

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

Your feedback

Focusing growth

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

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

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

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

Other

Tell us why
Refer attached submission.

Accessible local centres

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

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

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

Other

Tell us why
Refer attached submission.

Avoiding hazards

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

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

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

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

Other

Tell us why
Refer attached submission.

Resilient infrastructure

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

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

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

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

Other

Tell us why
Refer attached submission.

Other feedback

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

Refer attached submission.

#7918

SUBMISSION BY DAVID WELSH FROM DRICON (A FLETCHER CONCRETE AND INFRASTRUCTURE BUSINESS) ON THE DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY

1. This submission is made to Auckland Council on behalf of David Welsh from Dricon (a Fletcher Concrete and Infrastructure Ltd Business) on the draft Future Development Strategy ("Draft FDS").

2. Dricon is a pre-mixed dry concrete business that supplies bagged concrete, mortars and sands to the building products market for use in construction and DIY projects. We are based in Tuakau with a blending and bagging facilitating and with the population growth are a growing business with need for expansion in the Auckland area. Our products are important for enabling home improvements, building of all kinds, landscaping, and enhancing municipal areas.

3. In Auckland, our business operations rely on appropriately zoned land (light and/or heavy industry) that meet our requirements. From a location perspective, this includes proximity to our supply chain, our employees and importantly our customers. Our activities also require land that offer certain features, such as large footprint size, good traffic access and provision of utilities with sufficient capacity and also land that allows our permitted activities to be carried out without reverse sensitivities issues arising. We currently operate from one location across Auckland, including both leased land and freehold sites. With little appropriately zoned land available and historically low vacancy rates across existing industrial property, we have experienced significant challenges in meeting our property requirements in Auckland.

4. David Welsh from Dricon (a Fletcher Concrete and Infrastructure Ltd Business) does not support the draft FDS in its current form and considers the key areas of concern to be:

   (a) The focus on intensification across existing urban areas in the draft FDS fails to take adequate account of the diverse needs of business land users. This includes land size (ranging from <100m^2 premises to large multi-hectare footprint buildings) and proximity to employees in residential growth areas. It also does not consider the impact of the size and frequency of vehicle movements that business land use can generate. Providing sufficient development ready industrial land, that addresses a broad range of requirements, is essential to enable businesses to meet the service, production, and distribution needs of the Auckland community, which in turn, stimulates economic development and generates employment opportunities.

   (b) While the draft FDS acknowledges the need for business land in future urban areas "particularly in the north, north-west and south", the proposed new timing for release of business land in these areas is significantly deferred from the current Council proposed timing (in many cases in excess of 10 years). This will constrain economic opportunity in locations already experiencing growth in residential development and will compound the need for people to travel extended distances to work.

   (c) Constraining land supply through a reduction of business land area and also deferring its release, will severely constrain economic opportunity, escalate land price, and add to land affordability problems which will impact businesses' future growth plans.

(d) The draft FDS inappropriately relies solely on urban consolidation to provide all new business land through until 2030/35. The historically low industrial vacancy rates[1] across the existing urban areas of Auckland demonstrate there are limited new additional growth opportunities for industrial land. This is particularly acute for business activities that have real or perceived reverse sensitivity issues with adjacent land users, such as manufacturing activities typically undertaken in heavy industrial zone areas and business activities requiring large footprints.

(e) Since the Unitary Plan became operative, Council has relied on the private sector to advance plan changes to live zone Future Urban zoned land. There have been no public plan changes completed by Council (PC5 in Whenuapai was promoted but subsequently withdrawn). All major rezonings have relied on the private sector. Given this precedent and as the draft FDS removes the ability for private plan changes, the private sector is very concerned that Council will not ever meet the deferred proposed timing for release of land.

5. Accordingly, David Welsh from Dricon (a Fletcher Concrete and Infrastructure Ltd Business) requests that the draft FDS is withdrawn and is postponed until consultation has been undertaken with the development and business community to better understand capacity in the existing urban area and the land supply needs of Auckland.

Yours faithfully,



David Welsh
General Manager – Commercial
Fletcher Concrete

[1] Colliers New Zealand, Auckland Industrial Colliers Essential 1H 2023, P.1.

Future Development Plan 2023 #7920

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

Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why
No infastucture or roading or flood plane consideration

Accessible local centres

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

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

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

Disagree

Tell us why
Roading first

Avoiding hazards

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

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

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

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

Agree

Tell us why

Absolutely agree we are affected by flooding

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Other feedback

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

Future Development Plan 2023 #7935

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Accessible local centres

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

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

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

Agree

Tell us why

Avoiding hazards

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

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

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

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

Disagree

Tell us why

Resilient infrastructure

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

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

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

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

Disagree

Tell us why

Other feedback

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

#7935

Fletcher Steel™

BUILDING ON TRUST

28 July 2023

SUBMISSION BY FLETCHER STEEL ON THE DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY

1. This submission is made to Auckland Council on behalf of FLETCHER STEEL on the draft Future Development Strategy ("Draft FDS").

2. Fletcher Steel is a large Manufacturer and Distributor of Steel products who are embarking on a major investment strategy for its key Brands. Fletcher Steel are investing in new manufacturing facilities to continue providing Steel products to the industry and providing future employment across the board. Fletcher Steel are investing in building green field sites that comprises of new purpose-built facilities, comprising each of our sub brands within the Steel portfolio.

3. In Auckland, our business operations rely on appropriately zoned land (light and/or heavy industry) that meet our requirements. From a location perspective, this includes proximity to our supply chain, our employees and importantly our customers. Our activities also require land that offer certain features, such as large footprint size, good traffic access and provision of utilities with sufficient capacity and land that allows our permitted activities to be carried out without reverse sensitivities issues arising. We currently operate from Eight (8) locations across Auckland, including both leased land and freehold sites. With little appropriately zoned land available and historically low vacancy rates across existing industrial property, we have experienced significant challenges in meeting our property requirements in Auckland.

4. **FLETCHER STEEL** does not support the draft FDS in its current form and considers the key areas of concern to be

   (a) The focus on intensification across existing urban areas in the draft FDS fails to take adequate account of the diverse needs of business land users. This includes land size (ranging from <100m^2 premises to large multi-hectare footprint buildings) and proximity to employees in residential growth areas. It also does not consider the impact of the size and frequency of vehicle movements that business land use can generate. Providing sufficient development ready industrial land, that addresses a broad range of requirements, is essential to enable businesses to meet the service, production, and distribution needs of the Auckland community, which in turn, stimulates economic development and generates employment opportunities.

   (b) While the draft FDS acknowledges the need for business land in future urban areas "particularly in the north, north-west and south", the proposed new timing for release of business land in these areas is significantly deferred from the current Council proposed timing (in many cases in excess of 10 years). This will constrain economic opportunity in locations already experiencing growth in residential development and will compound the need for people to travel extended distances to work.

Fletcher Steel™

BUILDING ON TRUST

(c) Constraining land supply through a reduction of business land area and also deferring its release, will severely constrain economic opportunity, escalate land price, and add to land affordability problems which will impact businesses' future growth plans.

(d) The draft FDS inappropriately relies solely on urban consolidation to provide all new business land through until 2030/35. The historically low industrial vacancy rates[1] across the existing urban areas of Auckland demonstrate there are limited new additional growth opportunities for industrial land. This is particularly acute for business activities that have real or perceived reverse sensitivity issues with adjacent land users, such as manufacturing activities typically undertaken in heavy industrial zone areas and business activities requiring large footprints.

(e) Since the Unitary Plan became operative, Council has relied on the private sector to advance plan changes to live zone Future Urban zoned land. There have been no public plan changes completed by Council (PC5 in Whenuapai was promoted but subsequently withdrawn). All major rezonings have relied on the private sector. Given this precedent and as the draft FDS removes the ability for private plan changes, the private sector is very concerned that Council will not ever meet the deferred proposed timing for release of land.

5. Accordingly, **FLETCHER STEEL** requests that the draft FDS is withdrawn and is postponed until consultation has been undertaken with the development and business community to better understand capacity in the existing urban area and the land supply needs of Auckland.

Yours faithfully,

[redacted]

Head of Operations – Fletcher Steel

[redacted]

[1] Colliers New Zealand, Auckland Industrial Colliers Essential 1H 2023, P.1.

Future Development Plan 2023 #7936

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why
Please refer to submission document.

Accessible local centres

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

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

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

Other

Tell us why
Please refer to submission document.

Avoiding hazards

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

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

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

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

Disagree

Tell us why
Please refer to submission document.

Resilient infrastructure

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

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

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

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

Other

Tell us why
Please refer to submission document.

Other feedback

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

Please refer to submission document.

#7936

SUBMISSION ON DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY

TO: Auckland Council ("**Council**")

SUBMITTER: Bunnings Limited ("**Bunnings**")

SUBMISSION ON: Draft Auckland Future Development Strategy ("**Draft FDS**")

Summary

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

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

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

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

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

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

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

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

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

6. Bunnings seeks that:

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

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

Key Statutory Requirements

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

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

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

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

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

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

(d) the feedback received from this consultation;

(e) every National Policy Statement; and

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

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

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

Well-functioning urban environments

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

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

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

4 NPS-UD, clause 3.17.

Infrastructure funding constraints

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

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

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

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

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

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

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

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

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

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

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

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

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

Providing for sufficient development capacity

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

Plan Change 78

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

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

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

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

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

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

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

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

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

Management of natural hazard risks

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

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

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

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

Procedural issues

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

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

7 NZCPS, Policy 25.

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

Relief sought

33. Bunnings seeks that Council:

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

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

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

Next steps

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

Bryce Hutchison
Head of Property - NZ
Bunnings Limited

Future Development Plan 2023 #7946

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Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Attached submission from Waiuku Business & Development Association

Submission on Auckland Future Development Strategy 2023-2053

Submitter: Waiuku Business & Development Association

Waiuku

1. The Draft FDS effectively ignores the needs of the people living in Waiuku and the vitality and viability of its urban environment. Capping Waiuku's greenfield growth will not achieve a well-functioning urban environment. Waiuku should be allowed to naturally grow so that the town can meet the social, economic and cultural needs of its people. This includes the housing and employment needs of the mana whenua of the district, Ngati te Ata, and the specialist retirement living housing needs of older persons. To deny Waiuku any greenfield residential expansion will not meet the demand for housing from local employment, including the proposed Glenbrook Steel Mill site development, and the horticultural industry. Affordable housing is needed to attract and retain staff for local businesses and will achieve a stronger "place based" community where residents are invested in their "neighbourhoods" and can "live, work, and play" locally.

2. Waiuku is a well-established medium-sized service town situated on the Waiuku River at the southern end of Manukau Harbour. It was formally marked out as a town in 1851[1]. Waiuku's 20,000 serviced population catchment, it's distinct coastal influenced natural environment and remote location out to the side means it has a different character and function to other rural towns and settlements. Waiuku is more self-sufficient than it's neighbours and it's residents see themselves as independent to Auckland. The population of Waiuku itself cites over half the work destinations being within or very close to Waiuku. The economic base of the area includes primary production, heavy engineering/manufacturing, forestry and tourism.

3. Waiuku has historically experienced low rates of growth due to not having greenfield areas available for development unlike most other settlements in the region. This is despite the land being identified as being suitable for urban development over 10 years ago by the legacy Franklin District Council. The 2012 Auckland Plan nominated the rural town of Waiuku for moderate change.

4. Waiuku is currently experiencing high demand for housing and commercial and retail space. With current and projected industrial growth, such as the Fernleigh Industrial Development, this demand will continue to increase. If private and urban development is stifled, and the town is not allowed to grow to meet the current and future needs indicated, we risk losing businesses and services to other towns such as Pukekohe. This would increase the need for locals to travel to obtain services. One of Auckland Council's goals is to reduce emissions, which includes the ability for people to work locally rather than commuting to work. Allowing for urban growth in Waiuku aligns with this goal.

5. We are aware of the shortage of retirement living options available in Waiuku for our aging residents. Without more housing and facilities, these residents may be forced to move away from their home town, families and support networks. There are no large sites that are suitable for a

[1] Section 2.4 Common Ground Urban Design Report for O'Hara Waiuku Plan Change dated March 2022.

retirement village in the current residential zoned land, and now the main option is Pukekohe. Moving to another town that is approximately 20 km away breaks the relationships older people have with their friends, family, and community, at a time when they are most vulnerable.

6. The settlement of Waiuku is not subject to a Rural Urban Boundary (RUB). At the time of the AUP the IHP did not recommend that the RUB be placed around rural and coastal towns and villages suggesting that a better approach to managing growth is by a combination of the restrictions on the intensity of rural subdivision and that any change for a rural to urban zoned would involve a plan change process that needs to the meet the relevant statutory tests including alignment with the AUP regional policy statement. The most relevant provisions being within B2.6.1 and B2.6.2 of the Regional Policy Statement. Despite the urban expansion of Waiuku not specifically anticipated in the Auckland Plan 2050 and the AUP, growth of rural towns is anticipated, and specifically provided for and enabled (if the assessment criteria are met).

Submission Auckland Future Development Strategy 2023-2053

92 Constable Road, Waiuku

Auckland Unitary Plan (AUP) and Private Plan Change 73: O'Hara, Waiuku

7. The Waiuku Business and Development Association are in support of PC 73: O'Hara which seeks to rezone approximately 32.5 hectares of land from Rural-Mixed Rural to Residential- Mixed Housing Urban and to introduce a new precinct within the Auckland Unitary Plan (Operative in Part). This land is located to the west of Waiuku and adjoining Waiuku College. The site's location supports low carbon mobility, being walkable to the town centre and within proximity to Open Space zoned land. The land is currently zoned Rural- Mixed Rural. The Council's decision to decline the Plan Change is currently subject to three appeals.

8. PC73 rezoning is intended to maintain the ratio of houses to jobs within Waiuku over the next 10 years and reduce commuter travel. The Fernleigh industrial development, east of Waiuku, would provide a significant increase to the local employment base, of between 1,400-3,000 jobs. It is understood that further employment growth is expected within Waiuku and immediate surrounds. The plan change if approved would enable approximately 700 dwellings to be built. This would positively contribute to Waiuku being a well-functioning urban environment.

9. As confirmed by the Plan Change 73 decision, the site can be adequately serviced with three waters infrastructure. While some public works need to be undertaken before physical connections can be provided, those works are planned and funded. Watercare has recently secured a site for the treatment plant for the Southwest upgrade, and the private development contributions from PC73 could contribute to the funding of that project. The provision of infrastructure is not a barrier to the urban growth of this greenfield land.

Proposed Changes- Rural Settlements

10. The Future Development Strategy (FDS) is largely silent on the future form and function of urban environments, like Waiuku. The FDS identifies Waiuku as a *Rural Settlements* (undefined) and does not anticipate a focus of residential growth. In Figure 3 on page 33 of the Draft FDS there are 4 growth scenarios proposed. Scenario D proposes no growth in rural towns and villages, and Scenario A limits growth to the existing capacity, and it is requested that both options are rejected by the Planning Committee. Scenario C is a bit unclear as to what "market attractive" means, but it does refer to "expansion", so is supported if it does actually provide for the growth of Waiuku. Scenario B is the clearest and provides for limited growth in rural towns and villages. This option is also supported providing that "limited" is not too restrictive and that the growth includes greenfield growth for both employment and housing opportunities.

11. We disagree that Waiuku is a rural settlement, and it is a well-established rural service town with a strong history with a population of approximately 10,000. It services a wider catchment of over 20,000 people including the Awhitu peninsula. The Draft FDS has failed to understand Waiuku as a place, it's community, and its projected growth. Statistics New Zealand currently defines rural areas as "rural settlements" of 200 to 1000 residents with at least one community or public building[2]. Waiuku because of its size, history, significant rural catchment, available services, infrastructure and amenities, planned employment node and infrastructure investment, needs to be elevated above the status of 'rural settlement' and provision needs to be made to feasibly accommodate growth and potential expansion within this town.

12. After Pukekohe, Waiuku is the second biggest town in the Region and is twice the size of Warkworth. While Warkworth is planned to quadruple in size as a "satellite", and has significant new areas of greenfield land, the Draft FDS proposes little if any growth in Waiuku. The needs of the people of Waiuku to have some managed greenfield growth, appear to have been overlooked in the drafting of the FDS. The housing needs of Waiuku cannot be supplied in urban areas that are approximately 20 km away, and it is not logical for workers to commute from the main urban area and Pukekohe, to Waiuku and nearby businesses for employment, when staff could live locally.

13. We question whether specific analysis has been given to determine the feasible, reasonably expected to be realised development capacity, particularly for towns like Waiuku. We understand that economic specialists often comment on how difficult the process of estimating future capacity is, which is reliant on dozens of interrelated changing inputs and assumptions (refer recent evidence and mediation for Plan Change 73-Private: O'Hara Waiuku). The development capacity has relied on erroneous assumptions regarding the ability of redevelopment/intensification to meet housing demand. While there may be "plan enabled" capacity through the MDRS the reality is that reasonably expected number of dwellings is insufficient to meet demand within Waiuku over the next 10 years.

14. The proposed short sighted FDS will severely restrict all further greenfield development, which will have significant implications on the competitive operation of land and development markets

[2] Ministry of Primary Industries, Rural Proofing Guide for policy development and service delivery planning.

within Waiuku. Rather than infill brownfield being preferred over greenfield development to accommodate growth within towns, both options should remain to enable the 30-year land release needed to increase competition. By limiting options, land value increases undermining housing affordability and choice. Master planned larger development, such as that proposed by O'Hara enables more diverse housing stock and quality urban design to meet the demand and contribute to well-functioning urban environments. The FDS should consider the option to urbanise greenfield land through a plan change process.

15. The FDS signals a clear policy direction on the part of the Council, and in relation to Waiuku inadequate provision has been made to support growth. There is insufficient information available to properly consider the significance of the FDS on Waiuku. To ensure Waiuku is a well-functioning urban environment with reduced vehicle kilometres travelled, greenfield growth for Waiuku needs to be accommodated within the FDS.

FDS Process, Implementation and Incorrect Assumptions

16. The FDS implementation approach signals a significant change to the long-embedded growth strategy landowners and agencies have worked towards giving effect to, which would inappropriately predetermine the outcome of future plan changes processes. The process to adopt the FDS is less formal and contestable than the RMA plan change process and as highlighted above is not supported by a robust, publicly available evidence base meeting the requirements of s32 of the RMA and able to be tested by affected landowners and other interested parties. At the very least there should be the ability for submitters to present at the Planning, Environment and Parks Committee prior to the adoption of the Strategy.

17. The FDS evidence report concludes that the past pattern of decision-making shows that the policy frameworks in the Regional Policy Statement of the AUP is not strong enough[3]. The FDS implementation consequently suggests the need to strengthen matters for assessing plan changes and that the "*sequencing strategy is embedded into the Regional Policy Statement. This will provide greater decision-making weight to the sequencing strategy on plan change applications*[4]"

18. We strongly oppose any direction to change to the regional policy statement to prevent private plan changes outside the RUB. The lack of contestability will seriously undermine the ability to achieve fair and just planning outcomes. Such suggested implementation change is reminiscent of the Metropolitan Urban Limit being embedded in the Auckland Regional Policy Statement preventing private interests and district councils being able to give effect to the Auckland Regional Growth Strategy or Sector Growth Agreement. The FDS should not result in a similar undersupply of urban land.

19. In 2016, the Auckland Unitary Plan Independent Hearings Panel (IHP) warned that the Future Development Strategy shouldn't be a method for controlling the urbanisation process, *as it would inhibit or even prevent meritorious proposals for greenfield development without a full assessment of those merits*[5]. We concur with the IHP that "*it is important that methods for*

[3] Appendix 1: Legislative, statutory and policy context of the overall evidence report
[4] Paragraph 49 Planning, Environment and Parks Committee 04 May 2023 Agenda Item 9
[5] Pages 9 and 10 IHP Report to AC Topic 028 Future Urban Zone 2016-07-22

providing land for urban development should be contestable to enable choices and reassure people and communities that restrictions on urbanisation will not result in an undersupply of land for urban purposes[6]".

20. Such suggested changes to the RPS would also be contrary to Policy 8 of the NPS:UD:

> *"Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:*
>
> *a) unanticipated by RMA planning documents; or*
>
> *b) out-of-sequence with planned land release."*

21. In support of this suggested implementation approach the draft strategy makes the following statement:

> *"Private plan changes severely undermine coordination: …*
>
> *a. Future urban areas have come under increasing development pressure. Rather than the sequenced approach provided for through the FULSS, live zoning has come through private plan changes ahead of time. Up until the end of March 2023, 10 private plan changes were fully operative in the future urban area. A number of other private plan changes are being processed with more expected. In effect, private plan changes are driving the strategy. This has removed any degree of certainty in sequencing and timing of growth and has forced the council group to become more reactive to ever changing priorities – both in the timing of development and the number and spread of areas being live zoned."*

22. The statement is misleading. Rather than undermining coordination of growth, approved private plan changes have consistently been determined to be the most appropriate means to achieving well-functioning urban environments and the purpose of the RMA. Such private plan changes facilitate the required development capacity and are part of the solution rather than the problem. Auckland Council has failed to effectively deliver a growth management program, particularly for towns like Waiuku. It does not have the resources to fund the required plan changes and is reliant on the private sector to advance private plan changes. We reiterate the comment of the IHP that it is important that methods for providing for urban development remain contestable especially for the overlooked town of Waiuku. The ability for the private sector to advance private plan changes should be retained rather than removed.

Conclusion

23. The future role and function of the unique service town of Waiuku should be recognised within the FDS. We seek that the FDS supports both greenfield and brownfield to accommodate growth, enable competitive land and development market and to enable Waiuku to be a well-functioning urban environment.

[6] 5.1 Statement of Issue, Contestable methods of managing growth Page 8 IHP Report to AC Topic 028 Future Urban Zone 2016-07-22

24. The FDS recommended implementation approach signals a significant change to the supply of land for urban purposes and would prevent meritorious proposals for greenfield development without full assessment. Given the significant implication of the FDS, we are concerned about the unjust lack of contestability in the FDS adoption process, which relies upon incorrect and inappropriate assumptions.

25. If the Council is to adopt one of the Scenarios in Figure 3, it is requested that Scenarios A & D be rejected. Scenarios B and C are supported to the extent that it is made clear in the final FDS that managed greenfield expansion of Waiuku is allowed, for employment and residential activities, and not just growth from infill. The rigorous assessment process for expansion would still apply.

26. Waiuku is its own unique locality with a strong identity, and providing for growth is necessary to meet the social, cultural and economic needs of its people. If Waiuku is effectively "capped" and not allowed to grow organically, it will struggle as a town, and be "hollowed out" of essential businesses and services by competing centres such as Drury and Pukekohe. This will increase travel demand and will not be a well-functioning urban environment. Managed growth is what the RPS and NPS-UD provide for, what mana whenua are seeking as kaitiaki, and what the people and community of Waiuku need for their wellbeing.

Waiuku Business and Development Association

28 July 2023

Future Development Plan 2023 #7948

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

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

Accessible local centres

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

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

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

Disagree

Tell us why

See attached supporting evidence, specifically paragraphs 3.5 - 3.9

Avoiding hazards

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

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

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

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

Disagree

Tell us why

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

Resilient infrastructure

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

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

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

Founders agrees investment in infrastructure is required, however Council should consider and encourage alternative funding propositions to deliver this infrastructure.
Founders considers a more flexible approach is required to enable developers to directly contribute to masterplanned infrastructure in order to unlock areas of growth in line with local growth nodes.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Founders suggests the draft FDS is premature and should await the outcome of PC78 and associated implementation of medium density residential standards and intensification policies that implicate urban growth and servicing priorities.

Founders opposes the strong bias set out in the draft FDS against greenfield development as a general starting point for accommodating future urban growth.

Founders generally supports the principles for guiding growth so long as fair recognition is given to the potential for greenfield opportunities to sustainably deliver growth in accordance with those principles.

Founders strongly opposes the suggestion that the draft FDS and any future versions would be enshrined as the only sequence of growth for Auckland.

Founders is concerned that the FDS provides inadequate reference to the WSP, a comprehensively prepared structure plan that should be relied on to expedite growth in Whenuapai coincident with the Westgate Metropolitan Centre, an FDS priority area.

Founders strongly opposes the suggestion that Whenuapai North (Stage 1) future urban area should be delayed at all, and especially not until after 2035 as currently proposed by the draft FDS. The Kennedys Road peninsula within Whenuapai North (Stage 1) can be serviced independently of the balance of Whenuapai with costs being met by developers and therefore should be bought forward to enable growth by 2027 or at least within the first tranche of development within Years 1-11.

FEEDBACK ON AUCKLAND COUNCIL'S

DRAFT FUTURE DEVELOPMENT STRATEGY 2023-2053

To: Auckland Council

Private Bag 92300, Victoria St West, Auckland 1142

Feedback on: Draft Auckland Future Development Strategy 2023-2035

Name: Founders Development Limited

1. Introduction

1.1. Founders Development Limited (**Founders**) was established with a focus on residential land development. It was a break away from Wilshire Group, who was established in 2014 for the purpose of undertaking residential development activities at scale, Founders specialises in greenfield subdivision and residential development in Auckland. Founders is committed to contributing to the response to critical housing demand through provision of additional serviced lots and/or dwellings for residential development to the private market, thus facilitating housing supply and enabling growth within Auckland.

1.2. Founders and its predecessor Wilshire Group has successfully undertaken the subdivision and development of several large land parcels in the region (including in Westgate and Mt Wellington) and has a proven track record in the delivery of quality residential outcomes.

1.3. Founders has an interest in land on Kennedys Road, in Whenuapai.

2. Background

2.1. The Whenuapai Structure Plan (**WSP**) prepared by Auckland Council dated September 2016 anticipated the land to the south of the NZDF Airbase (Areas 1A-E) within Stage 1 together with a pocket to the west at Kennedys Road (including Founders' site in Area 1F), with the balance of land to the west and north of the NZDF Airbase within Stage 2.

2.2. Stage 1 identified areas of residential and business land that could be development ready within 2-10 years' (2018-2026) by relying on existing infrastructure or where limited improvement was required. Stage 2 identified areas where future investment in new infrastructure was not anticipated until after 2027.

2.3. Consistent with the WSP, the Future Urban Land Supply Strategy (**FULSS**) prepared by Auckland Council dated July 2017 anticipated Whenuapai Stage 1 would be 'live zoned' between 2018-2022. Following this, Whenuapai Stage 2 was anticipated to be 'live zoned' between 2028-2032.

2.4. Accordingly, in 2017 Auckland Council progressed with preparing and notifying a plan change application to rezone Whenuapai Stages 1A-E (referred as Plan Change 5 (**PC5**)) from Future Urban zone to a combination of residential and light industry zones. Despite proceeding to hearings, and informal notification of a variation to PC5, after delay for various reasons, including to enable further aircraft noise testing and to further consider mechanisms for the funding and financing of arterial road upgrades, Auckland Council withdrew PC5 in June 2022.

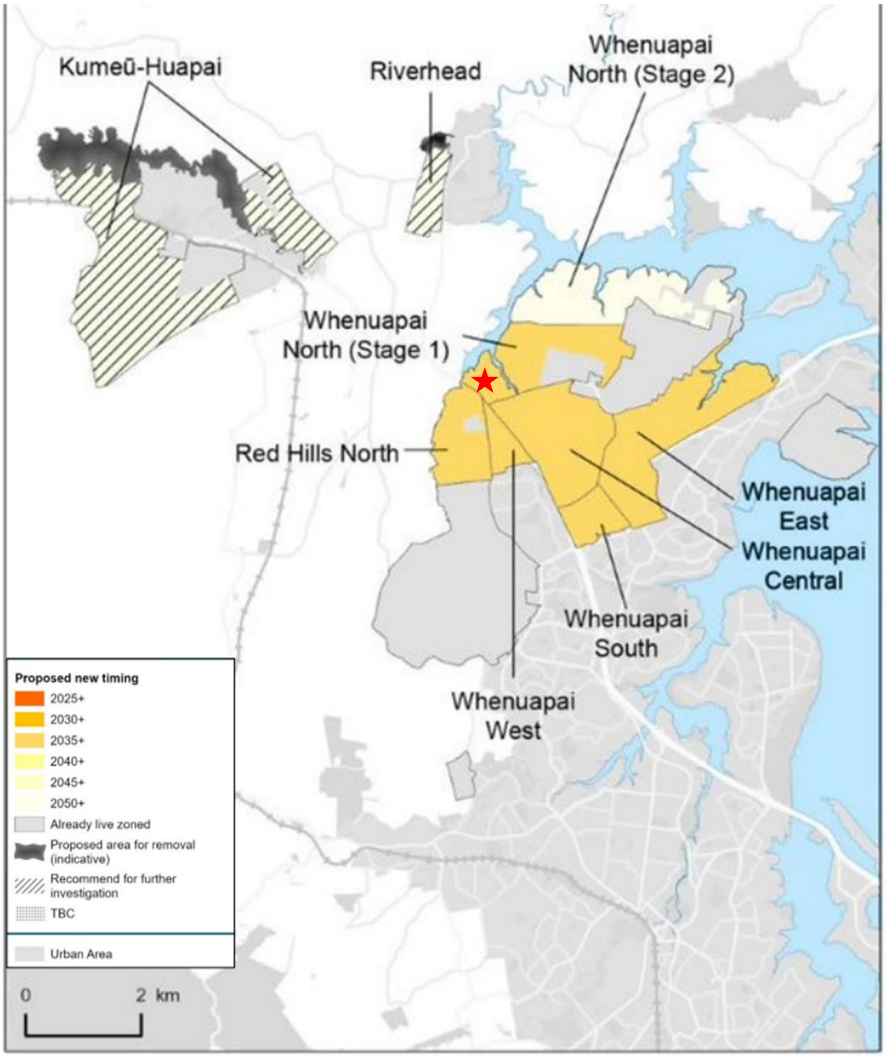
2.5. The Auckland Future Development Strategy 2023-2053 (**FDS**) provides a 30-year outlook for growth in the Auckland region, forecasting development across two spatial priority areas/tranches: Years 1-10 and Years 11-30.

2.6. Auckland Housing Programme areas including Mt Roskill, Mangere, Tamaki, the City Centre, and the Metropolitan Centres of Westgate and Drury-Opaheke are identified within Years 1-10. Future Urban zoned areas are identified within the later bracket.

2.7. Founders' landholding at Kennedys Road is zoned Future Urban in the AUP and is located within the 'Whenuapai North (Stage 1)' area in the FDS (Figure 1), pushing development ready status out from 2018-2022 under the FULSS to 2035+ under the FDS. The site is anticipated for low-medium residential activity under the WSP.

Figure 1 – Excerpt from FDS

(Figure 42 - Proposed timing and approach for Kumeū-Huapai, Riverhead, Whenuapai and Redhills future urban areas)



3. Feedback on Draft FDS

3.1. The draft FDS identifies that the advent of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act and the implementation of medium density residential zoning, alongside mandatory intensification of specific urban areas has required a "rethink" of how the Council plans for and services growth.

3.2. The draft FDS identifies five principles for guiding growth and development. Founders makes the following comments in respect of these principles insofar as they relate to Whenuapai North (Stage 1) in particular. At the outset, Founders records its disagreement with the draft FDS' heavily weighted favouring of brownfield or existing

urban areas for the focus of growth, on the basis of what are broad and in some instances inaccurate generalisations regarding the potential benefits of greenfield growth.

3.3. Further, Founders suggests that if the impetus for revisiting the city's growth strategy arises from the implementation of medium density residential standards and the other intensification policies set out in Plan Change 78 (and others) to the Auckland Unitary Plan (AUP), that it might be more appropriate to await the outcome of that process, rather than leapfrog it as the draft FDS has now done. PC78 has stalled and its future uncertain, as are its outcomes. To that end, it would appear the draft FDS is shadowboxing as regards the statutory context in which growth must be accommodated.

3.4. Notwithstanding, the following comments are made.

Principle 1 – Support greenhouse gas emissions

3.5. Principle 1(a) makes a broad assumption that greenfield development will result in a high 'vehicle kilometres travelled' (**VKT**), as compared to brownfield intensification. Principle 1(b) seeks to strengthen accessible, walkable and mixed-use neighbourhoods. Principle 1(c) seeks to bring jobs and people together, to reduce the VKT.

3.6. The Westgate Metropolitan Centre is identified as a key employment hub, and as being suitable for further development within Years 1-10 of the FDS. It follows therefore, based on the principles summarised above, that the land surrounding this hub would be programmed similarly, within Years 1-10 to deliver residential development at the same time as growth occurs within the Centre, providing a local catchment of employees and customers with a low VKT to travel between the residential catchment and the Centre.

3.7. At Appendix Page 27, the FDS states *"Westgate is linked with the Whenuapai future urban area which is expected to provide a range of employment opportunities. The delivery of infrastructure for Whenuapai future urban area supports unlocking business land much needed in the north-west to help address the shortage of employment land. Prioritising funding for delivery of a range of infrastructure projects in the short to medium term will ensure Westgate, including the Whenuapai area is well-prepared to take up the benefit of rapid transit. Projects needed to unlock this area include several local road and State Highway upgrades, pump station upgrades, wastewater projects and a water main project. In particular, the delivery of infrastructure for Whenuapai future urban area will support unlocking business land that is much needed in the north-west.*"

3.8. Founders agrees that the Whenuapai future urban area will support unlocking the Westgate business land, however the FDS does not appear to align residential growth and business growth simultaneously. Residential activity within Whenuapai will not come on-line until the decade following Westgate, and once 'live zoned' between Years 11-30 will take several years to consent, construct and handover residential dwellings to future

local employees and customers of the Westgate Metropolitan Centre. In the meantime, employees and customers will require greater VKT to service and access the Westgate Metropolitan Centre.

3.9. Founders considers therefore that, as a minimum, the forecasted residential areas of Whenuapai should be bought forward to the Year 1-10 tranche, hand-in-hand with local business growth in order for the FDS to deliver on Principle 1.

Principle 2 – Adapt to the impacts of climate change

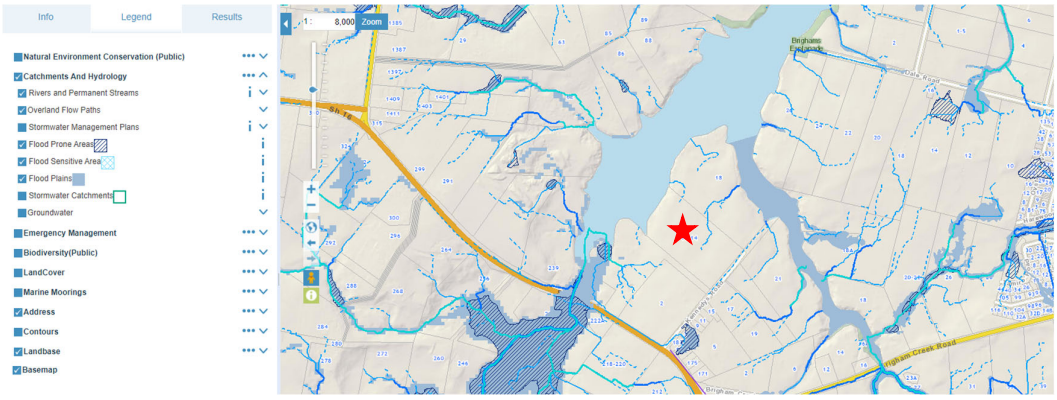
3.10. Principle 2(a) seeks to avoid further growth in hazard areas, and states that "growth will not be enabled in known hazard areas where people, property or infrastructure would be exposed to significant risk".

3.11. While Founders' supports this intent, it considers that larger development sites, often in greenfield areas, have greater ability to incorporate a low-impact environment-led management response to flood hazards. The appropriateness and cost of engineered solutions should be assessed on a case-by-case basis, rather than adopting a 'no development' blanket approach to managing hazard effects in greenfield development, as doing so risks leaving otherwise suitable land undeveloped.

3.12. The corollary of discouraging residential development in flood hazard areas is that development should be encouraged in Future Urban areas that are not subject to flood hazards, facilitating residential development capacity in appropriate locations. For example, Whenuapai North is not subject to widespread flooding or inundation. Such hazards are limited to isolated locations which can be readily managed and are located outside of Founders' landholding as shown in Figure 2.

Figure 2 – Whenuapai North flood hazard map

(Founders' landholding as shown in red)



Principle 3 – Make efficient and equitable infrastructure investments

3.13. Principle 3(a) seeks to take a regional view to infrastructure investment and costs, Principle 3(b) seeks to make the best use of existing infrastructure, and Principle 3(c) seeks to make investment decisions that deliver on multiple outcomes.

3.14. Firstly, these principles assume that private development must be reliant on public investment to deliver the infrastructure that is required to facilitate growth and development. This does not recognise the role that private developers can play in funding and delivering infrastructure to service their own development, and in some cases to also facilitate, provide for or futureproof infrastructure capacity for the wider existing or future community, alleviating Council of this capital cost outlay.

3.15. Developers are often forthcoming to deliver the infrastructure that is required to enable development and welcome the opportunity to work with Council's infrastructure teams and CCO's to do so. Equally, developers acknowledge the requirement to pay Development Contributions to wider upgrades and would be eager to enter into an Infrastructure Funding Agreement with Council if it expedited the delivery of shared infrastructure to unlock a growth area.

3.16. These alternative funding propositions are not welcomed or encouraged by the FDS as, broadly speaking, Council considers this will result in the ad-hoc delivery of infrastructure. This is not the case in areas where extensive masterplanning, analysis and consultation have occurred, such as that undertaken by Council when preparing the WSP.

3.17. Secondly, the significant delays proposed in the FDS stem from Council's position that all infrastructure is required to be operational before the 'first cab can leave the rank'. As evidenced by the FDS, this approach will result in significant delays, holding up all development in the respective area while Council firstly funds, and then consents and

constructs, up front infrastructure in advance of development. As we have seen region-wide, this approach results in construction costs growing over time becoming more difficult for Council to fund as time progresses to the point where no upgrades occur as a result.

3.18. This does not factor in a staged approach that can remain integrated in respect of delivering smaller pieces of a wider infrastructure masterplan to be delivered in line with iterative growth over time, and/or better utilising IFA opportunities to fund infrastructure.

3.19. Instead, Appendix Page 27 provides a list of costly infrastructure, all of which is required to be in place before the FDS considers the area suitable for the 'full build out' of growth, including:

Whenuapai North (Stage 1)

- SH16 to SH18 Connections
- Brigham Creek Road upgrade
- SH16 -18 Upgrades
- North-west Rapid Transit
- Upper Harbour (SH18) Rapid Transit
- Trig Road Water Reservoir, North Harbour No. 2 Watermain Project
- Brigham Creek Pump Station Whenuapai Redhill Package 1
- Northern Redhills to Brigham Creek Wastewater Project
- Whenuapai and Redhills Wastewater Scheme

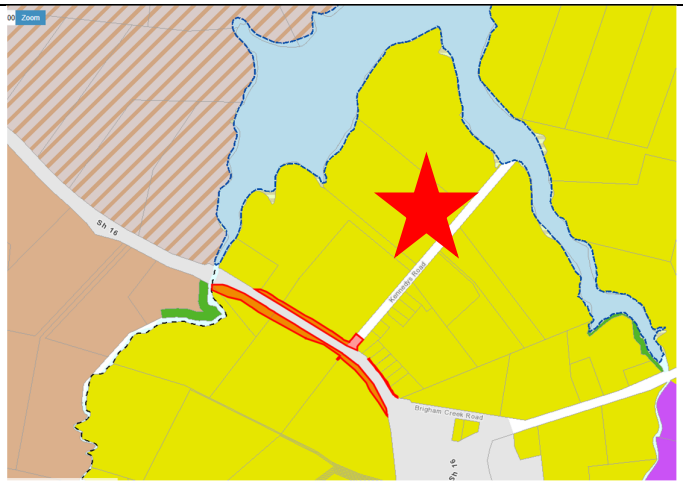
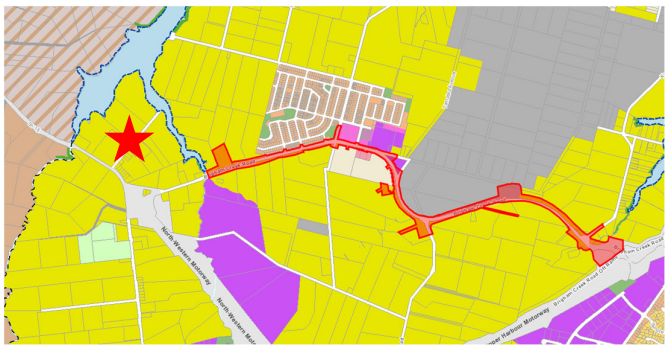
3.20. Each of the listed infrastructure projects are significant individually, both in terms of time and cost, but it is virtually impossible to expect Council to fund, consent and construct all of the above in a timely manner, based on previous track record. For example, the SH16 Brigham Creek-Waimauku upgrades have been funded since the 2021 RLTP, however the southern part of this NOR (relating to Whenuapai) is yet to be notified some two years' later, demonstrating the significant lead-in time, even when funding is secured.

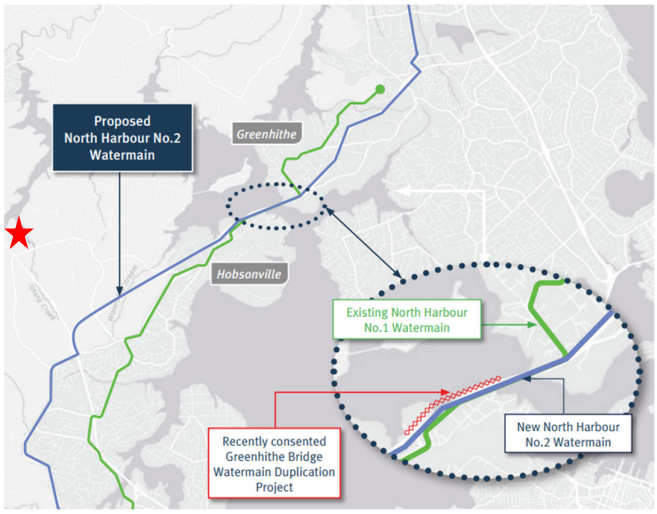
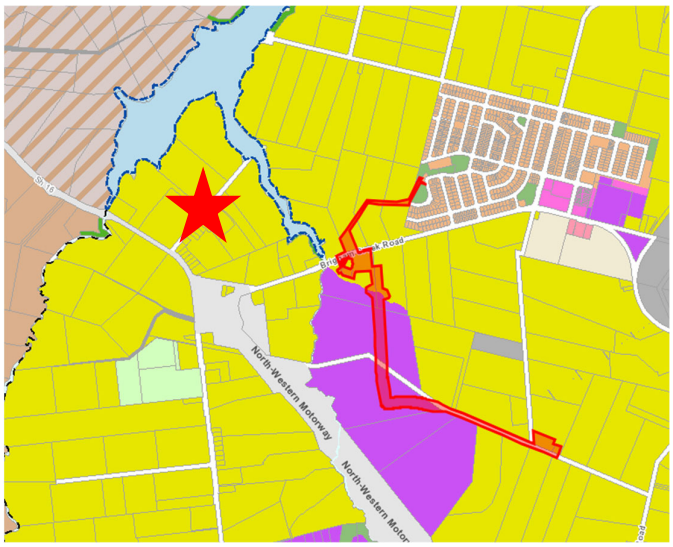
3.21. The FDS provides an opportunity to encourage developers and Council to achieve a coordinated funding and financing approach via an IFA to facilitate private contributions to expedite infrastructure provision. This would also facilitate a staged development approach to both infrastructure delivery and growth enabling short-term growth to occur in advance of the full build-out of all listed infrastructure, provided development is consistent with a wider structure plan.

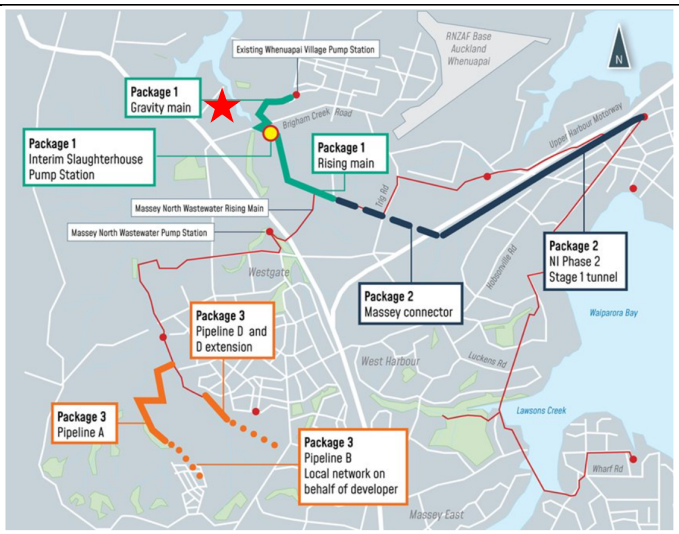
3.22. In the case of Whenuapai North (Stage 1), the western peninsula within this stage stands alone and is largely bound by SH16 and the estuary. As identified in the WSP, the largest constraint in this location is wastewater infrastructure, and provided this is delivered by a private developer, there is no need to delay growth. Preliminary transport engineering input confirms minor transport upgrades can be provided by a developer to mitigate traffic effects on SH16 until the wider upgrades occur. This enables iterative residential growth to support Auckland's housing supply, without jeopardising Council's wider delivery of infrastructure.

3.23. More specifically, the following comments are made in respect of the above-listed infrastructure relative to the development-readiness of Whenuapai North (Stage 1):

Infrastructure	**Comment**
SH16 to SH18 Connections	The draft FDS does not acknowledge the recent steps taken by Auckland Transport to support future integration of urbanisation and transport networks, specifically in the form of multi-modal arterial routes with active mode facilities and public transport priority in the recently lodged Notices of Requirement. We understand that the Supporting Growth Alliance has lodged an NOR application with Auckland Council to upgrade and widen SH16 between the northern end of Fred Taylor Drive (at the intersection with Brigham Creek Road) and Ngongetapara Stream, being the SH16 frontage of the Kennedy's Road peninsula, however the application is yet to be notified. The Regional Land Transport Plan 2021-2031 confirms these works are funded by Waka Kotahi ($137m) as part of the SH16 Brigham Creek-Waimauku upgrade, and construction is anticipated to be completed by 2027. It is anticipated the NOR will provide for active modes and improved connectivity between Whenuapai North (Stage 1) and Westgate to the south.

	
Brigham Creek Road upgrade	The Brigham Creek Road upgrade works do not adjoin the Kennedy's Road peninsula and are not required to enable development in this area accordingly. 
SH16 -18 Upgrades	The scope of these works is unclear; regardless the intersection of SH16 and SH18 is located some 2.5km to the south of the site and preliminary transport advice indicates that no upgrades of the intersection are required to facilitate development within the Kennedy's Road peninsula.
North-west Rapid Transit	Preliminary transport advice indicates these works are not required to facilitate development within the Kennedy's Road peninsula nor will it improve connectivity with the Westgate transport hub (but will facilitate public transport from Westgate to the CBD in the long-term).
Upper Harbour (SH18) Rapid Transit	Preliminary transport advice indicates these works are not required to facilitate development within the Kennedy's Road peninsula nor will it improve connectivity with the Westgate transport hub.

Trig Road Water Reservoir, North Harbour No. 2 Watermain Project	Currently under construction. 
Brigham Creek Pump Station Whenuapai Redhill Package 1	Watercare has lodged the NOR application for Package 1, however the application is yet to be notified, as shown in red below. Package 1 works relate to the northern end of the Whenuapai and Redhills Wastewater Scheme, being the location closest to the Kennedy's Road peninsula as shown in green below. Construction of Package 1 is due to be completed by the end **2025**. This provides wastewater capacity within the vicinity of the Kennedys Road precinct for private developers to connect to. 

	
Northern Redhills to Brigham Creek Wastewater Project	Refer Package 3 shown in orange above. These works are not relevant to future development in Kennedy's Road nor Whenuapai North (Stage 1) and should be removed from the list at Appendix 6 of the FDS.
Whenuapai and Redhills Wastewater Scheme	Duplication of above – delete this line item from Appendix 6 of the FDS.

3.24. As such, Whenuapai North (Stage 1), at least within the Kennedys Road peninsula, will be **development ready by 2027,** assuming Founders will connect the site to the Brigham Wastewater Pump Station. There is no need to hold back development until 2035+.

3.25. In summary, Founders considers a more flexible approach is required to enable developers to directly contribute to masterplanned infrastructure in order to unlock areas of growth in line with local growth nodes.

Principle 4 – Protect and restore the natural environment

3.26. Principle 4 seeks to protect, restore and connect ecosystems and to integrate the natural and built environment.

3.27. Comprehensive structure planning such as that undertaken in respect of the WSP can achieve these outcomes as greenfield developments often have land area to accommodate water sensitive design and to enhance the quality of wetlands. The outcomes sought to be achieved by Principle 4 are embedded in the National Policy Statement for Freshwater Management 2020 (which development must give effect to), and the regulations contained within the National Environmental Standards for

Freshwater 2020 ensuring that greenfield development will achieve Principle 4. Ecological assessments are widely acknowledged as being required as part of any greenfield development or subdivision with conditions of consent requiring management plans to protect and enhance ecosystems and habitats common practice. As such, the aspirations of Principle 4 can be readily achieved through specialist input at the structure planning and consenting stage of greenfield development. This is not therefore another reason to delay growth in future urban areas.

Principle 5 – Enable sufficient capacity for growth in the right place at the right time

3.28. Principle 5 seeks to discourage growth in areas not already prioritised by Council, despite the National Policy Statement for Urban Development 2020 (**NPS-UD**) clearly directing local authorities to be more responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is unanticipated by RMA planning documents or is out-of-sequence with planned land release (Policy 8).

3.29. The FDS is intended to determine the sequencing and timing for when a future urban area will be ready for development to commence, with structure planning providing the next level of detail to effectively integrate land uses with infrastructure provision. Section 1.4.7 of the Future Urban Areas Evidence Report (June 2023) (**FUA Evidence Report**) acknowledges that structure plans are required by the AUP to establish the appropriate pattern of land use and infrastructure, opportunities and constraints, the effects of urbanisation on (and connectivity with) neighbouring areas.

3.30. Neither the FDS nor FUA Evidence Report suitably acknowledge the WSP, an existing structure plan for Whenuapai Stages 1 and 2. While the land remains Future Urban in zone, there is a clear expectation of urban growth such that development in this area is not entirely unanticipated or out-of-sequence. Council undertook years of work and extensive public consultation to prepare and produce this structure plan. The FUA Evidence Report criticises private plan changes for the isolated view often taken relative to structure planning the subject piece of land. This is not the case for the WSP, which was Council-led and takes a wholly integrated and comprehensive view across the wider Whenuapai area, including its relationship to and connectivity with neighbouring communities including Westgate and Hobsonville.

3.31. The FDS states *"…future urban areas will be sequenced, with this sequencing linked to triggers dependent on when <u>all</u> the required bulk infrastructure can be provided."* The bulk infrastructure that is listed as being required in Whenuapai North (Stage 1) is extensive and as discussed above, not all of which is required to be implemented before development can commence in some areas. Specific to Founders, Whenuapai North

(Stage 1) can be serviced independently of the balance of Whenuapai and will development ready by 2027 with costs being met by developers, and is ~1km from the Westgate Metropolitan Centre and spatial growth area. There is no need to delay residential growth in Whenuapai North (Stage 1) to 2035+ therefore.

3.32. The NPS-UD does not require the respective local authority to fund infrastructure that is necessary to delivery out-of-sequence development. Plainly, the onus falls on the applicant/developer to deliver infrastructure that is required to service the development, as well as to provide/contribute to infrastructure that is identified as being required by a relevant structure plan or precinct plan. For example, the WSP identifies wastewater upgrades are required to unlock the Kennedys Road peninsular; Founders is willing to deliver and/or fund the northern end of this network accordingly.

3.33. To appropriately deliver the intended outcomes of Principle 5, the FDS should build on the work undertaken to date as part of the WSP to enable 'self-serviced' development to progress in line with growth local growth within the adjacent Westgate priority area.

Other matters

3.34. Finally, section 1.3.7 of the FUA Evidence Report states that highly productive land 'is a factor to be considered in terms of context for this report but is not a determining factor'. Clause 3.4 of the National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**) clearly excludes Future Urban zoned land from the NPS-HPL, which states *"despite anything else in this clause, land that, at the commencement date, is identified for future urban development must not be mapped as highly productive land."* Future Urban zoned land is clearly excluded from the NPS-HPL, and therefore should indeed be a determining factor when considering whether or not to facilitate growth.

4. Key concerns

4.1. Founders suggests the draft FDS is premature and should await the outcome of PC78 and associated implementation of medium density residential standards and intensification policies that implicate urban growth and servicing priorities.

4.2. Founders opposes the strong bias set out in the draft FDS against greenfield development as a general starting point for accommodating future urban growth.

4.3. Founders generally supports the principles for guiding growth so long as fair recognition is given to the potential for greenfield opportunities to sustainably deliver growth in accordance with those principles.

4.4. Founders strongly opposes the suggestion that the draft FDS and any future versions would be enshrined as the only sequence of growth for Auckland.

4.5. Founders is concerned that the FDS provides inadequate reference to the WSP, a comprehensively prepared structure plan that should be relied on to expedite growth in Whenuapai coincident with the Westgate Metropolitan Centre, an FDS priority area.

4.6. Founders strongly opposes the suggestion that Whenuapai North (Stage 1) future urban area should be delayed at all, and especially not until after 2035 as currently proposed by the draft FDS. The Kennedys Road peninsula within Whenuapai North (Stage 1) can be serviced independently of the balance of Whenuapai with costs being met by developers and therefore should be bought forward to enable growth by 2027 or at least within the first tranche of development within Years 1-11.

Signature



Simone Horrobin

General Manager – Property Development

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Future Development Plan 2023 #7953

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Disagree

Tell us why

I disagree with this policy there have to be some exceptions to the rule. Waiuku has no areas for development and provision needs to be made to feasibly accommodate growth and potential expansion within this town which mean's expanding into green areas. We need more accommodation for our aging population to stay in Waiuku where their friends and family are at this time they need family around them. Plus with the industrial developments happening in the area, eg Steel mill more affordable accommodation is needed for the people coming to work in these industrial developments.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Agree

Tell us why

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Waiuku is its own unique locality with a strong identity, and providing for growth is necessary to meet the social, cultural, and economic needs of its people. If Waiuku is effectively "capped" and not allowed to grow organically, it will struggle as a town, and be "hollowed out" of essential businesses and services by competing centres such as Drury and Pukekohe.

Future Development Plan 2023 #7954

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1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Other

Tell us why

If growth is going to be more intensive, then it will be necessary to better plan and invest in infrastructure. Particularly travel infrastructure and green/ blue infrastructure.
The form of intensification will also need revisiting, moving away from infilling practices which is leading to greater impervious areas (with more runoff) and loss of urban trees.

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?

Agree

Tell us why

We agree with the caveat that considering "resilient infrastructure", it may be possible to mitigate some of the risks mentioned here. This could mean that, the areas that appear "risky" under current urban paradigms might not be if we designed things differently.

Consideration of more subtle changes that make Auckland more susceptible to climate change also require addressing. Urban development onto high class soils is a key area. While these areas may not be vulnerable to flooding, etc., their loss does make our food supplies less resilient to the impacts of climate change.
Areas that are more ‘hazard vulnerable’ could be used for other purposes such as urban gardens or green spaces. While some damage may still occur, ecosystem-based uses may also improve the resilience of these areas to the effects of climate change.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

We agree with the approach however it is critical that the integration of nature-based infrastructure is grounded on solid scientific evidence. There is a lot of uncertainty about the

impacts of nature-based infrastructure. It is not clear whether evidence and recommendations that were mainly developed in the US, Europe, and China are applicable to Aotearoa New Zealand. Furthermore, there is a risk of "greenwashing" in this area, particularly as developers will increasingly use the terminology but may not understand or properly implement the principles. With these caveats in place, we do have skills and knowledge (and research findings) for the Auckland and New Zealand context that can be effectively and more widely deployed. The deployment of some of these practices are likely to require some institutional changes and coordination within Auckland Council.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Future Development Plan 2023 #7963

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Other

Tell us why
please refer to our submission.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why
Please refer to our submission

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Disagree

Tell us why

Doesnt provide for Iwi Orders to provide for our people.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Other

Tell us why

Great concept too hard to implement please refer to our submission

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Please find our submission for the Future Development Strategy from Ngati Tamaoho

#7963

NGĀTI TAMAOHO TRUST

Auckland Council Draft Future Development Strategy Ngati Tamaoho Submission:26th July 202

"Kaua te tau e pōkea,

Kaua te tau e rewanatia,

Koia hoki te tūturutanga i heke iho nei i ō tātou tūpuna"

"Let the land remain whole as handed down by our ancestors"

To: Auckland Council.

Ref: Submission Draft Future Development Strategy

Ko Taupiri me Maungarongo nga Maunga,

Ko Waikato te Awa,

Ko Te Mānukanuka o Hoturoa te Moana,

Ko Tainui te Waka,

Ko Mangatangi, ko Whātapaka, ko Ngā Hau E Whā ngā Marae

Ko Ngati Tamaoho Matou.

Paetawhiti: Long Term Aspirations.

1. Restoration of damaged ecological systems
2. Restoration of ecological harmony
3. Ensuring that resources and their usefulness increases
4. Reducing risk to present and future generations
5. Providing for the needs of present and future generations



The goal of Ngāti Tamaoho is to ensure that the needs of the present and the future generations are provided for in a manner that goes beyond sustainability and enhances/restores the environment. An 'enhancement' approach requires the consideration

not only of individual resource use, and activities, but also a holistic approach to the whole environment. It aims for positive ecological and social outcomes where the resource use and activities affecting the environment become a conduit for producing resources and energy, improving physical and psychological health, remedying past pollution, and transforming and filtering waste into new resources.

The impact of the FDS will be disproportionate.

Ngati Tamaoho believe that achieving a resilient, equitable and liveable Tamaki Makaurau / Auckland is a laudable goal.

We have seen significant change occur over the last 200 years and especially in the last 40 years. However, we wish to remind Auckland Council that Ngati Tamaoho has been here for hundreds of years – the impact of change to fellow Aucklanders does not equate to the impact that it has had on mana whenua of Tamaki Makaurau.

Whilst we have mana whenua status over Auckland, we have a strong interest is in the Southern Area.

General comment

Whilst the National Policy Statement on Urban Development from the Crown / Government has accelerated this work, it was always the view of Ngati Tamaoho that the Unitary Plan was going to have disadvantages in addition to the advantages of spatial planning and urban growth. Our Iwi currently works and has worked with developers. We believe that the development / construction community – and in the turn the marketplace – has always sought to fulfil the promise made by the Unitary Plan (2016). So, we do not begrudge them for that. The draft FDS does not identify any significant new areas for growth and that is inconsistent to the unprecedented growth from development that is occurring in the Papakura, Drury to Pukekura area, the Paerata and Drury, Karaka Areas.

Some preliminary comments

We provide the following broad comments based on our review of the relevant draft Future Development Strategy however we believe that specific deeper engagement with Ngati Tamaoho would be appropriate. These comments therefore should be seen as only preliminary.

1. **Spatial arguments**

33% of 15,000 HA which was seen as Future Urban by the Unitary Plan is either live zoned or under a plan change process. The argument between urban sprawl or intensification is no longer current. The argument is about how to do both well. From our perspective, how to do both in line with supporting the interests and enabling mana whenua wellbeing and broader Māori who reside in the Auckland region. Ngati Tamaoho believes the draft FDS is in general terms appropriate to obtain that balance, but we understand that there is still more work to be done on the operational level for implementation.

2. **Environment focus is very important**

The FDS draws strongly on the need for greater environmental protection. However, we reaffirm the need to acknowledge and understand the role of mana whenua as Kaitiaki. Over the next 30 years under this FDS, our role will become more important. Intensification can bring both environmental advantages and disadvantages. Differentiating between the two will require relevant expertise

including those offered by mana whenua, particularly through a Te Ao Māori perspective. Ngati Tamaoho supports the focus on environment balanced with urban growth however the Kaitiaki role of mana whenua should be further enhanced and strengthened.

3. Process / Consultation-light

Area specific plans or strategies have had more time for consultation. For example, the Drury-Opaheke Infrastructure Plan (2018) was two years of challenge and agreement by Council and Crown with 10 Iwi Authorities. This is a six-week consultation process in the middle of Winter. Ngati Tamaoho believes that direct engagement with the Iwi should be undertaken before the public consultation period. The move towards having a committee or working committees with only a few members designated to have decision making powers on behalf of Ngati Tamaoho is not conducive to us.

4. Cultural Acknowledgement.

Acknowledgement of the cultural landscape through regulatory and infrastructure projects is lacking and Mana Whenua engagement input has been requiring more time and capacity to fulfil the gap in understanding and knowledge. In large scale infrastructure the requirements for a process for heritage is not taken into account and this is another aspect that needs to be understood.

5. Preliminary comments on specific examples

(a) **Drury-Opaheke:** Several private plan changes were accepted by Council in December 2022. Some of those developments would be affected by the proposed FDS. Ngati Tamaoho does not have a view on any of those proposed designations in Drury-Opaheke. However, we are of the understanding the infrastructure promised by Government and Council remains intact – this includes the NZ Upgrade Programme package of initiatives the problem is the intensity scope and scale of all the infrastructure going on at once our capacity has been compromised. We would like the Council to designate no go areas on the flood plains.

(b) **Takaanini:** We support the proposed designation of Takaanini and parts of Opaheke as hazard or flood prone areas. This is not new to Council or relevant experts or mana whenua. Ngati Tamaoho wishes to advise that such designations were in place previously by Council and yet relinquished during private plan change processes.

(c) **Drury West:** We do not have a view on the designations proposed by the draft FDS for this area. However, we do reaffirm the need for Council and Government to keep its infrastructure promises. Much effort and time was utilised by mana whenua to engage with developers and landowners in this area to have it diminished by a step-back from the Council and Government on its infrastructure commitments. Ngati Tamaoho is committed to the proposal that any developments to occur West of Oira Road will be challenging. The green belt created between the two live urban zone areas of Paerata Rise and Drury West will go some way in supporting the rejuvenation of the streams and waterways that run through and in between those two live zone areas.

(d) **Pukekohe / Paerata**: The draft FDS will have a significant impact on projects around Pukekohe. The town ship is seen by Council as a metropolitan township to support the surrounding areas. This is appropriate. However, Pukekohe is also the rohe of Ngaati Tamaoho. Any urban intensification in this town must ensure authentic and strong mana

whenua engagement. Any promised Council and Government infrastructure resources should remain. Pukekohe is well known in New Zealand history as a town that once practised ethnic segregation; any future growth must see mana whenua and Māori outcomes be integrated in all plans and initiatives. Growth in Pukekohe also means growth of Ngaati Tamaoho aspirations. We are seeking to have buffer areas around the Pukekohekohe Maunga of which we want to retain the viewshafts to our Maunga and retain the site lines from our marae Nga Hau E Wha.

(e) **Waiuku / Glenbrook / Clarks Beach / Kingseat:** Ngati Tamaoho does not have a view on proposed FDS impact on these areas. However, we are of a strong view that any development within these towns must be well planned and consider the mana of the Iwi over Manukau Harbour. Ngati Tamaoho would prefer to have single story zoning around new train stations established in greenfield areas. That walkways and trails are established respectfully or not with the help of the mana whenua.

(f) **Patumāhoe:** Ngati Tamaoho believes this area and those mentioned at (d) and (e) above are part of the vegetable bowl of the country. We therefore support any proposed changes that stops the sprawl into these areas. This has been the view of Ngati Tamaoho since the implementation of the Unitary Plan, so we remain consistent on this point.

(g) **Central Isthmus:** Ngati Tamaoho does not have a view on specific areas in the Central Isthmus. We work collaboratively with other Iwi, Council entities, Crown agencies, and the private sector. Following the development and finalisation of the FDS, the Iwi will continue this collaborative kaupapa as Kaitiaki across the Auckland region.

We look forward to further engagement on the draft Future Development Strategy.

Naku Noa, Na,

[redacted]

NGĀTI TAMAOHO TRUST

Future Development Plan 2023 #7984

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Your feedback

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1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Agree

Tell us why

However the development and support of RUral Areas also needs to occur. It cannot be excluded

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Agree

Tell us why

The PLan also has to cater for the smaller centres and how these will be developed

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

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We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

NOte also that rural and tourism based communties also need resilient infrastructure

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

PLease also find attached the Waiheke Winegrowers feedback

Waiheke Winegrowers Submission – Auckland Future Development Strategy 2023 – 2053

July 2023

[redacted] - President Waiheke Winegrowers Association

1. Overview

The development strategy identifies the challenges facing our community, to quote "The Hauraki Gulf Islands are a distinctive feature of Tāmaki Makaurau, significantly contributing to local economies through tourism while providing unique and often ecologically significant landscapes. The island communities face different challenges to rural communities on the mainland, especially employment, housing and infrastructure. "

Not one part of the development strategy deals with these issues. Surely this is a fundamental failure in this strategy document. I can only imagine that other similar communities through the Auckland region are feeling similarly abandoned. Piha, Clevedon and Kawakawa to name a few.

To give context to our issues;

- The housing issue has become so acute that well-paid qualified tradesmen are having to leave the island
- Housing of farm labourers and hospitality workers has become a must do part of a Winegrower's responsibility. This is a serious burden some Winegrowers cannot afford as well as putting the employee in a difficult position should they wish to change jobs.
- It's common to see workers living in cars. Ad hoc caravan parks have been created on other properties as rental accommodation.

Imagine the situation where the there are no plumbers or electricians resident on an island of 10,000 residents. Imagine the impact on the environment if overflows from sewerage systems must await an off island visit? Think of the cost of three hours travel time and a car ferry ticket?

We are slowly but surely moving to a hopeless situation.

We need some hope for the coming 30 years.

We need Auckland Council to recognise that there are long term development goals for Waiheke that need support

2. The Winegrowers

The Waiheke Winegrowers Association has 23 member vineyards representing 97% of all vineyard land on Waiheke Island and Ponui Island. Waiheke Island is internationally recognised as producing some of the finest and most sought after wines in the world. The average bottle price for these wines is higher than any other wine region in New Zealand. Our Wine region has received at least 7 international trophies and 20 of our member vineyards consistently rate 5 stars (the highest rating). That's over 80% with a 5-star rating compared to the national average of just over 10% (reference Michael Cooper's NZ Wine Guide).

3. Our most Urgent and pressing Feedback

Therefore we are proposing the following updates to the strategy.

1. Urgently review the Hauraki and Gulf islands district plan to
    a. Allow the construction of workers accommodation under rules equivalent to visitor accommodation
    b. Allow for green fields development of rental and rent-to-own housing
    c. Enable streamlined and cost-efficient processes for tiny homes (say max $2,000 for all compliance costs for each unit)

2. Commit to new rules to balance the provision of tourist accommodation/AirBnB with permanent rental accommodation. These rules should not include new taxation as this will inevitably drive up all prices. Some of Australia's tourist regions are doing looking at options we need to consider.

3. Ensure that a balance is created between tourism and the provision of the appropriate infrastructure to support it. In the light of data that 70% of tourism spend on Waiheke Island is by Auckland residents (see the Royal Commissions enquiry into the separation of Waiheke from Auckland Council for the original data), then inevitably the city's citizens must fund the majority of Infrastructure investment.

4. Ensure our transport services are affordable for all. Cutting Waiheke off from the majority of Auckland's population is not what we want to achieve. We believe that effectively making Waiheke a giant gated community is contrary to the culture and values of Aucklanders' and New Zealanders'. We believe a varied and multi-cultural society is best for all.

5. Remediate Processes that don't work for Waiheke

Waiheke residents have longed complained about the rules of Auckland not being appropriate for our situation. I believe other semi-rural and rural regions of Auckland have the same feedback. Rather than making statements in general we would like to concentrate on tangible current issues that need long-term solutions

1. Roading needs to improved and appropriate for the change in use occurring. Electric cycles are becoming more common, as are larger vehicles. No allowance has been made for this change in use.

2. Improve the resilience of energy infrastructure. Waiheke is an ideal place to improve the provision of energy through renewables, batteries and wider electrification. Distances are short. Surely this should be part of a 30 year Development Plan if we are to meet our climate goals.

3. The application of alcohol licensing rules and plan provisions are at odds with one another. Planning provisions are based on the concept of existing use and yet Auckland council refuses to apply some of the provisions of the Sale and Supply of Alcohol Act 2012 that we see support this. Unfortunately this is likely to proceed to court as the costs involved for remediation can easily exceed $100,000 per site. Both parties seem to agree that no actual reduction of alcohol harm will take place, and the interpretation is at odds with every other

New Zealand Council. There are however situations where both the Licensing team and the proprietor agree that changes will help prevent alcohol harm but run into planning restrictions. We propose that all changes to licensed premises become automatically permitted when agreed with the Auckland Council Licensing team.

4. Update the Outstanding Natural Landscapes section of the Unitary plan
   The Outstanding Natural landscape (ONL) provisions have been applied to 4 vineyards on Waiheke. Our understanding of the Man'O War appeal to the provisions was that activities commensurate with operating a vineyard would be permitted, yet no update of the rules has occurred. Of the 4 vineyards in question, 4 have wineries, 4 have cellar doors and 3 have restaurants. Keeping the current provisions is effectively a long-term death sentence for these businesses. They will either have to go to court to get changes approved or go under. Technology in the wine industry is moving on and the Council is currently limiting these businesses' ability to adapt with the rest of the industry to meet Customer needs. Alternatively excluding the vineyards from the ONL areas might be easiest.

   Some examples of relevant activities are;

   a. Construction of farm buildings

   b. New vineyard infrastructure

   c. New Wineries and additions or alterations to wineries

   d. On-site renewable energy provision

   e. Improvements to guest facilities

   f. New Restaurants and additions or alterations

   g. New Cellar doors and additions or alterations

   h. Implementation of Automation that may require infrastructure

   i. Improvements to Waste management and other Organic-related Infrastructure

6. Recognise and protect the Quality of Waiheke's Winegrowing soils

Defining Highly Productive Land

WWA does not agree with the LUC classification system being used as a stand alone for defining highly productive land. The historic nature of this classification system and its advantages and disadvantages are well described in the ministry's discussion document. However, like the Gimlet Gravels regions of the Hawke's Bay, Waiheke Island vineyard soils would not be classified as LUC 1,2, or 3 and so the classification system does not recognise the unique considerations of quality soils when related to wine grape production. Throughout the wine world, the highest quality wine grapes are always found on LUC 4,5, or 6 soils. Although this might seem counter-intuitive, the reason is well known. High quality wine grapes are small and have a very high skin to pulp ratio; all of the flavour is found in the skins. LUC 1 and 2 soils produce large fleshy grapes which make weak dilute

flavoured wines. LUC 4,5, and 6 soils cause the vine to struggle and this reduces grape berry size and increases flavour intensity. On Waiheke Island the soils that produce the best wines are therefore characterised by low fertility and high mineral content. This allows the production of small intensely flavoured grapes suitable for premium wine grape production

- The values and benefits of protecting highly productive land for grape-growing on Waiheke Island are self-evident
- The creating of 700+ jobs directly in the Waiheke wine industry
- The creation of a large amount of additional prosperity in associated support industries
- The payment of large amounts of tax by workers and owners
- The spin off effects for tourism by brand recognition internationally
- The saving on import receipts by not having to import an equivalent product

The prestige that accrues to New Zealand as a whole but producing some of the best wines in the world

Does the Current RMA Framework Adequately Protect Vineyard land on Waiheke Island?

The unequivocal answer to this is No. Urban sprawl continues apace and the pressures at the urban rural interface on Waiheke Island intensify year on year. There is a clear financial incentive under RMA rules for councils to allow subdivision of rural land. The income generated to councils is much greater from intensive housing estates than from rural land. It is imperative that the rules be changed to prevent councils from allowing rural lifestyle blocks and urbanisation to occur. Currently the values and wider benefits of Waiheke Island vineyard land are not being considered at all and we have recently lost one major premium vineyard property to subdivision. More will follow if action is not taken.

Rural Lifestyle Development

Unlike some other forms of farming, in the world of vineyards there is nothing intrinsically wrong with small blocks of land. Throughout the old world small vineyards are owned by families and lot sizes are small. Wine grape production is extremely labour intensive and this is especially true on Waiheke Island which is steep land. However, restrictions need to be placed on the types of farming that rural lifestyle block owners engage in. All too often these blocks have a few horses for the pleasure of the owner and thus remove prime vineyard land from production.

Reverse Sensitivity Issues

The current approach where newcomers to an agriculture area can complain about farming activities and have their complaints actioned by restrictions being placed on existing farming activities is intolerable. New Zealand urgently needs “right to farm” legislation similar to that passed in other similar countries. Urban dwellers who move to properties adjacent to vineyards should have no rights to complain over legal farming activities. Local authorities should be incentivised to protect the right to farm and to not incur costs to farmers in the investigation of this type of complaint.

How Should Highly Productive Land be Identified and by Whom

Farmers, especially wine grape growers, must be consulted. Traditional soil analysis is not capable of identifying soils that are highly productive for wine grape production. Only experienced wine grape farmers can identify such soils. In Auckland we have a council which has a very low level of expertise in farming knowledge and experience. Waiheke Winegrowers should be consulted about this and all matters relating to farming on Waiheke Island

Actions Relating to Land

We wish the following actions to be included in the development plan

1. Recognise that Waiheke's winegrowing soils, in combination with it's climate, gives the Auckland region a unique ability to produce quality wine
2. Implement measures to protect current and future winegrowing sites from development
3. Ensure planning rules allow reasonable existing use to continue

Future Development Plan 2023 #8003

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Your feedback

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1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Agree

Tell us why

The Equal Justice Project (EJP) supports this approach as the transport system is recognised as a key factor in New Zealand reaching its emission reduction targets. Domestic transport is responsible for 47% of CO2 emissions and 19.7% of total greenhouse gas (GHG) emissions (Te Manatū Waka Ministry of Transport, 2021). Focusing growth within existing urban areas could help to prevent congestion and reduce emissions by bringing people closer to jobs and services. People would have easier access to their daily needs by walking, cycling, and public transport. Reducing the extent of greenfield growth over the next 30 years could also allow time for critical infrastructure such as good public transport networks to be provided to ensure safe, sustainable communities in the future.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Agree

Tell us why

Transport accounts for 43.6% of the Auckland region's greenhouse gas emissions, with 86% of these emissions arising from road transport. An important mitigation response to this issue is achieving modal shift from private motor vehicle use to increases in both public and transport modes' patronage. In addition, reliance on private vehicles for transport has been identified as having a negative effect on physical and mental health and wellbeing (Rees, Masari, & Appleton-Dyer, 2020).
As a student charity, the EJP is concerned for the wellbeing and convenience for students and youth. As the cost of living crisis continues, students face increasing difficulty to own and operate a private vehicle. Having local centres easily accessible via a more robust public transport network (with less cancellations and delays), walking or cycling could reduce reliance on private transport, the associated negative impacts on physical and mental health, as well as GHG emissions. It could also waive the cost to operate a private vehicle and make life more convenient for young people overall. With daily life being more convenient and transport costs reduced, Auckland is likely to become more attractive to young people from across the country and the world in the future. The EJP therefore supports this approach.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why

The EJP agrees with this approach as the effects of climate change are clear, severe, and would likely worsen in the future. The flooding events and Cyclone Gabrielle earlier this year caused huge damages to Aucklanders' lives, wellbeing and properties. To avoid these tragedies, future developments should place safety as its priority as we prepare to face more severe climate events. Landslides were a common cause of damage in the severe events earlier this year. A range of factors could influence where and how strongly landslides occur such as local geology, the properties of the slope material (soil and/or rock), slope geometry and angle, surface vegetation cover, drainage, and any buildings which can add load to a slope (Brook, 2023). Consulting with scientists and identifying unstable land is crucial for future developments. Technology could also

be of great assistance. For example, the Interferometric Synthetic Aperture Radar (InSAR) uses space-borne radar to measure ground surface movement at a scale of millimetres per year and has been successfully used for Gisborne's planning (Brook, 2023).

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

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We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

Over the next 30 years, 520,800 more people are expected to live in Auckland, taking our population to 2 million. We will need 282,600 more jobs and space for around 200,000 new homes. The EJP agrees that new infrastructures need to be resilient to the huge increase in population and more severe climate change impacts. We agree that Nature-based infrastructure such as rain gardens, swales, and detention basins would be good solutions. However, a more resilient drainage system and stronger piping network could still be needed as we saw the fast accumulation of excess rainwater in the extreme weather events earlier this year.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Future for Electric Vehicles:

The expected rapid uptake of electric vehicles, and the potential capability to connect batteries with a battery network in the near future reminds us of the problem of how to properly recycle lithium batteries. The current method of simply shredding and trying to purify a complex mixture results in expensive processes with low value products. It costs more to recycle them than to mine more lithium to build new ones. With large-scale, cheaper ways to recycle these batteries still lagging behind, only about 5% of Li batteries are recycled globally, meaning the majority are going to waste (Abott, 2022). The EJP hopes that recycling of Li batteries receives much more attention in the city's development.

Future Development Plan 2023 #8014

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1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Disagree

Tell us why

1. Greenfield developments allow planned integration of services and transport so deliver a better result than random development in constrained suburban areas.

There are many good examples of greenfield developments over the recent years including Stonefields centrally, Hobsonville Point in the west, Addison The Avenues (Takanini) in the south and Millwater in the north. These developments were able to be well planned with new infrastructure including schools, parks, commercial/retail areas and transport options appropriate for the population density planned. In a post-build study of Addison completed for Council in 2019 a key discussion point was the importance of integrated land use and infrastructure planning. The two post-build failings cited in the review were that the planned train station and the planned commercial development were not completed.

The greenfield approach looks to take away from the congestion that plagues our central city suburbs and create new planned communities with local services, transport hubs, excellent electric train and/or fast electric bus routes and local business and commercial zones creating local jobs, so we see it as a good future planning strategy, if delivered as planned.

2. Allowing intensification across all city suburbs results in scattered intensification causing severely compromised infrastructure and negative property and infrastructure impacts.

Adopting a scattered approach to density housing (as currently suggested with Plan Change 78 which zones most of Auckland suburban areas MHU) makes it cost prohibitive and logistically impossible to deliver the supporting infrastructure and services needed for the safe, healthy and climate change proof growth of Auckland.

Scattered intensification eliminates the option for integrated planning and will result in reactionary infrastructure projects to mitigate the issues caused by intensification in older built out areas. It would be strategically better to plan development into more tightly defined areas where an integrated plan can deliver expanded commercial, transport and infrastructure services to support the intensification.

3. Higher costs for infrastructure projects in built up areas than in greenfield areas

We need look no further than at the current state of our existing dated water pipes in our older suburbs for infrastructure that is not coping with recent levels of infill housing. There is significantly higher cost in laying new pipes in built up areas than in greenfield areas. Intensifying built out suburbs requires more schools, parks, transport and commercial developments to service the increased population. Failure to provide these will result in greater emissions and traffic congestion. It is so much more difficult to implement this new infrastructure where the land is already built out. It would take significant land purchases at ratepayer cost to provide the additional schools and parks which would be required to result in improvements to the environment, the economy, and people's wellbeing in existing built-up areas.

4. An Auckland for all

Denser city living is not for all Aucklanders. While we see it as appropriate to create some well-planned areas of much greater intensification, where existing infrastructure and available land allows, it is equally important to maintain lower density areas to provide variety and options to meet all Aucklander's needs.

5. Auckland's topography and isthmus makes it prone to climate threats, supporting targeted and researched areas designated for growth, both within current urban and greenfield sites.

With the abundance of flood plains, natural streams, and land prone to coastal inundation, targeted and researched areas that will withstand climate change should become the growth areas of our city. Not all will be able to be accommodated in the current city's boundary. Future proofing of our critical infrastructure and transport links is vital to ensure a well-functioning infrastructure system within the parameters of the projected climate change impacts.

6. Highrise and higher density zoning, with supporting community and commercial services, to be expanded along railway routes and rapid bus lanes.

The Climate Change Commission states, "Transport makes up an increasingly large share of our overall emissions and is the single highest contributor in Auckland". Intensification along arterial roads will increase traffic congestion. Zoned intensification must be integrated with well-planned electric public transport options. Immediate and medium-term intensification should be targeted to current and future designated railway routes and rapid transit lane enabled neighbourhoods, where higher density developed areas are serviced with the vital transport infrastructure to support the population increase, without driving up emissions.

Identification and acquisition of land corridors required for future electric rail and bus networks needs to be planned and budgeted for now. Auckland Council's growth strategy needs to be closely integrated with a future strategic plan for Auckland Transport.

Accessible local centres

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We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why

1. Yes to town centres, but local centres only by exception.

We agree with regards to town centres but local centres need a detailed review. Local centres are often small and provide a limited variety of services. Topography of the land may deem them not particularly walkable for many people. Surrounding areas may be constrained by lack of public transport options and narrow roads, particularly in older inner suburbs.

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2. Business development in Local Centres must proceed in tandem with housing intensification

It is important to ensure that business development proceeds in tandem with housing development. There is a lot of land zoned for business or local centres that contains housing. In our area, recent requests for development of local centre/business zoned land has largely been to focus on housing and to actually reduce the existing commercial offering. Planning and controls will be required to get the balance right and ensure business development happens in tandem with housing intensification. Public transport, roading infrastructure, and parking also needs to be developed to service the growth in business areas.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why

1. Kohimarama and Mission Bay are amphitheatres sitting above flood plains, and hence are constrained by a natural hazard risk. Current zoning of predominantly Mixed Housing Suburban (MHS) and Single House (SH) must be maintained to protect against significant devastating flood damage.

Ongoing damage to homes and infrastructure has caused significant impact to people's lives and wellbeing. In our area, flood damage, significant slips and roading damage has impacted most residents in Kohimarama and Mission Bay. This initiative is critical to stop any future intensification development that exacerbates the problems. Implementation of controls on the steep slopes of our bay areas can't happen soon enough.

Our areas of Mission Bay and Kohimarama are both geographical amphitheatres with water flowing from steep slopes on three sides down to flat areas. Our flat areas are both flood zones and coastal inundation zones and regularly suffer both flood waters and coastal inundation from storms.

The new MDRS standards being reviewed under Plan change 78 seek to decrease the required landscaped permeable area from 40% to 20% for the zones that dominate the hill sides in our suburbs. This is a recipe for flooding disaster and risks threatening life and property across the area.

The slopes of Mission Bay and Kohimarama must be, as a minimum, maintained with their current zoning of MHS and SH, to ensure that development does not increase the significant impact of this natural hazard risk. There is a need to also review areas where the risk is exacerbated, that greater controls should be introduced to lessen the devastating impact from flooding that can occur.

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Mission Bay in particular has little permeable reserve area within the flood plains, which has already been zoned for further intensification. Greater impermeable site coverage for uphill developments is increasing the flooding downhill. Allowing increased impermeable coverage in

flood zones for new developments is like sinking a brick in the bath - raising the flood level for existing older structures which were not built with living areas raised.

Development in our area needs to be focused where the topography can accommodate the development safely, and the natural hazard zones should be excluded from greater intensification, without significant resilient infrastructure being delivered in the flood zones.

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?

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Tell us why

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Kohimarama and Mission Bay still retain a portion of its green landscape due to current predominant zoning of MHS and SH. However, we need to move quickly and assertively to introduce protections to green scape via zoning and protections to ensure that existing green scape is kept. New resilient initiatives should become part of any further development.

While existing green scape alone is unlikely to prevent the full impacts of intense rainfall, if it was coupled with nature-based infrastructure solutions and water-sensitive design, it could reduce the magnitude of flood impacts and have numerous other benefits.

A first key step is to retain all SH zoned land, particularly that which has Special Character overlay along with our MHS zone. Much of the SH zone was removed during the Unitary Plan process so it is critical to retain all that is remaining. The sites with this zoning have established trees and large permeable surfaces which assist with natural soakage for climate related events and tend to contain our urban forest. These two zones go some way to fulfil the goal of protecting the natural environment.

Plan Change 78 was proposing to remove practically all of our remaining SH and MHS zoned sites and this should be stopped in support of this approach. Retaining these two zones in appropriate areas, like Mission Bay and Kohimarama, and keeping controls within them for high percentage permeable land is a zero-cost solution to reducing climate change flooding.

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Resilient infrastructure principals are in theory a great approach that will assist with stormwater management as well as enhancing the environment. Our concern is that rain gardens will be easily implemented into green fields developments but far more difficult to implement in existing built out suburbs. Where does the land come from in inner city suburbs to build such nature-based infrastructure? Is there enough Council owned land where these can be implemented in our flood zoned inner city areas?

The first step to being able to implement this strategy is to stop any sale of existing Council owned parks and implement a control to ask first if the land is in an area requiring flood mitigation and if the land can be used for nature-based infrastructure.

Particular to our area would be to maintain Tagalad Reserve, which is within the flood plain in Mission Bay, as a park with good potential for nature-based infrastructure. Also, to complete the purchase of Kohimarama Forest which is private land with potential to be sold for development which currently serves multiple vital purposes. It is a green “soakage pit” for the valley’s rainwater, a haven for native birds and plants, and the streams purify stormwater naturally before discharging it into the bay.

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We have seen the fantastic result from the building of rocky outcrops and subsequent re-sanding of the beaches from St Heliers through to Mission Bay and Orakei. The protection to the beaches and the investment to the landscape, roads, cycle ways, bus lanes and footpaths has been immensely appreciated in these leisure areas enjoyed by all of Auckland city. Ongoing investment, improvements and additions to this initiative will ensure protection to the eastern bays for the generations to come.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

1. Protect crop growing soils on the outer rim of the city.

With Auckland looking to have a population of two million people in the next decade, food sourcing will remain a key priority. These soils are irreplaceable, and once gone to housing cannot be recreated somewhere else, resulting in increased reliance on imported natural food. Shifting food growing areas further out from the city will result in lower yield crops, increased transport times and costs, and a significant increase in emissions. Locally grown food is a major asset, and this unique highly fertile land should be preserved as a priority. If the strategy of green field developments along efficient rail corridors is adopted, precious fertile soil areas, like Pukekohe and Waiuku/Riverhead could provide the green belt in between new green field cities.

2. Reduce heat impacts within the city with clever use of green spaces and building materials, and shade and light planning principals.

E.g. Consider large developments having to provide a greenbelt and lighter coloured building materials being prescribed.

3. Utilise Auckland's location on and near harbour water ways as important transport corridors.

There is an opportunity to provide a comprehensive inner city water transport network around many areas of Auckland. A fleet of electric water taxis could be introduced to provide a regular service around the suburbs that border the Waitemata. Integrating water taxis into the transport plan to regularly move people around the city would in turn reduce emissions, reduce road congestion, reduce the need for parking, and provides an efficient user-friendly commuter service. This mode of transport should be included in a long-term transport strategy for the city as the population grows.

What the Future Development Strategy will address

The Future Development Strategy sets out the big picture vision for how and where we should grow over the next 30 years to achieve the best outcomes for Tāmaki Makaurau.

A changing environment

There has been a lot of change recently. Central government introduced legislation for more housing intensification across the city.

The effects of climate change are being felt more frequently, as seen by the Auckland Anniversary floods and Cyclone Gabrielle.

Addressing climate change

We also have a commitment to halve our greenhouse gas emissions by 2030 and reach net zero emissions by 2050 as part of Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan 2020(External link).
The way we grow and develop should improve the environment, avoid hazards and help address the impacts of climate change.

Focusing growth

This changing context means we need to update our strategy for how the city grows in the future.

There are many ways cities can grow. 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.

Focusing growth in our existing urban areas, rather than more growth on the edges, results in improvements to the environment, the economy, and people's wellbeing.

We will continue to invest in greenfield land currently under development to ensure they are successful and well-functioning.

We are proposing a small reduction in growth at the edge of the city for areas where we have identified significant natural hazard risks.

In some other areas on the city's edge we are proposing to delay development until we can afford to provide the large-scale infrastructure needed to connect these areas to the wider network.

Some areas are proposed for further investigation to better understand hazard risks, the relationship between existing and future land uses and the likely levels of vehicle trips and CO2 emissions that would be generated.

What we want your feedback on

We want your feedback on our approach to how and where Auckland should grow and change.

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

What do you think of our approach to focus most of Auckland's growth in existing urban areas?

1. ○ Agree
2. ◉ Disagree
3. ○ Other
4. ○ I don't know

Tell us why :

1. Greenfield developments allow planned integration of services and transport so deliver a better result than random development in constrained suburban areas.

There are many good examples of greenfield developments over the recent years including Stonefields centrally, Hobsonville Point in the west, Addison The Avenues (Takanini) in the south and Millwater in the north. These developments were able to be well planned with new infrastructure including schools, parks, commercial/retail areas and transport options appropriate for the population density planned. In a post-build study of Addison completed for Council in 2019 a key discussion point was the importance of integrated land use and infrastructure planning. The two post-build failings cited in the review were that the planned train station and the planned commercial development were not completed.

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What do you think of our approach to focus development near local centres?

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2. ○ Disagree
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Upload any supporting information you have

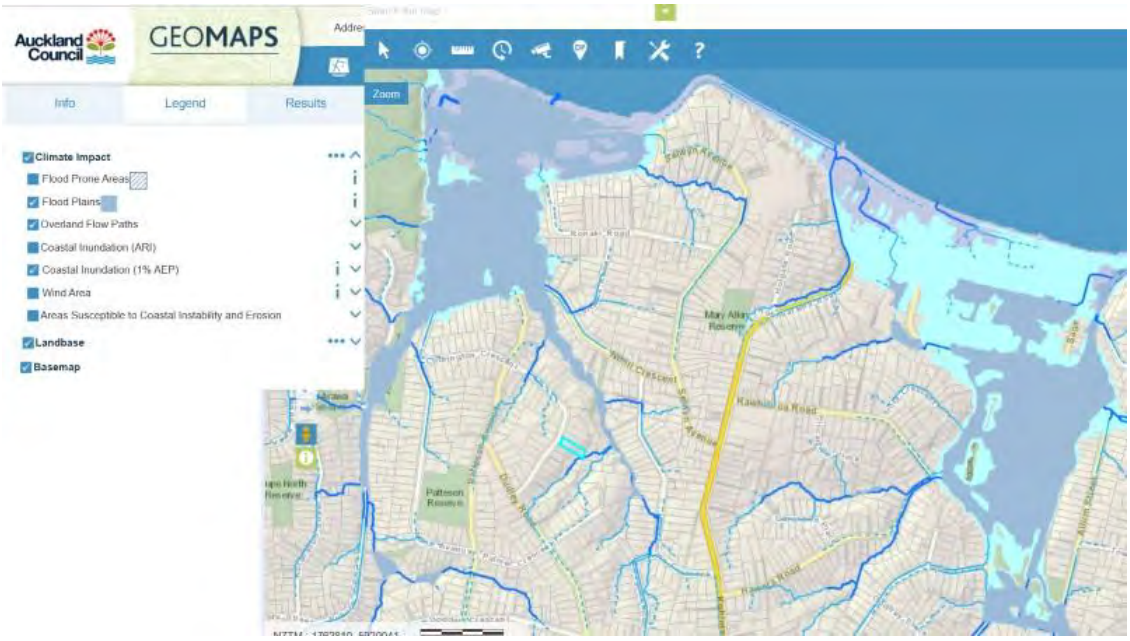
Our 2 suburbs are amphitheatres - with steep slopes side & back

30m

40m



Flood plains show 180° flows from ridges



December 2005

Flash floods hit Mission Bay

30 Dec, 2005 12:27am 2 minutes to read



Flooding at the corner of Tamaki Drive and Patteson Ave. Pictures / Michael Portman

By: Claire Trevett, Claire Trevett

For a brief time, there was no need to go down to the sea to ride a boogie board when flash floods hit Mission Bay.

The area was hit with heavy rain on Wednesday night that pooled on the streets to knee height, forcing some people to abandon their cars and shop owners to keep mops at the ready as the water flowed over the kerbs.

Local man Michael Portman said he heard the rain just before 8pm and when he looked out his window he saw two children on their boogie boards in the middle of the road behind his apartment.

"At that stage it was about knee deep in Marau Cres."

He said the park on the Mission Bay water frontage area was underwater and it went righ back across the road to the shop frontages.

"The storm water outlet that empties on to Mission Bay was just chundering out water. A the traffic lights in Mission Bay there were a couple of cars abandoned, that's how quickly the water came up. It all happened in about half an hour."



2014 Cyclone Ita – Mission Bay Selwyn Reserve



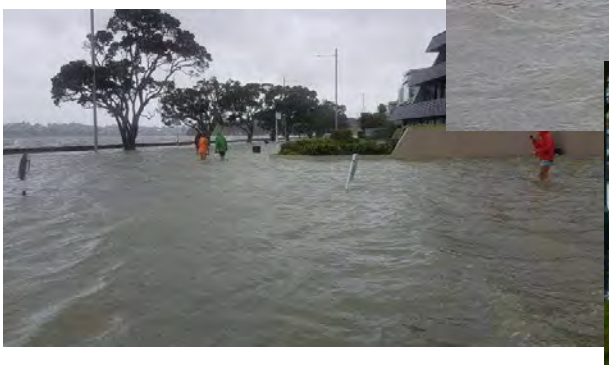
& Cnr Tamaki Drv / Patteson Ave



APRIL Ex Cyclone Debbie – Slip behind Kohi

Jan 2018 – Kohimarama and Mission Bay flooding





March 2022 Mission Bay

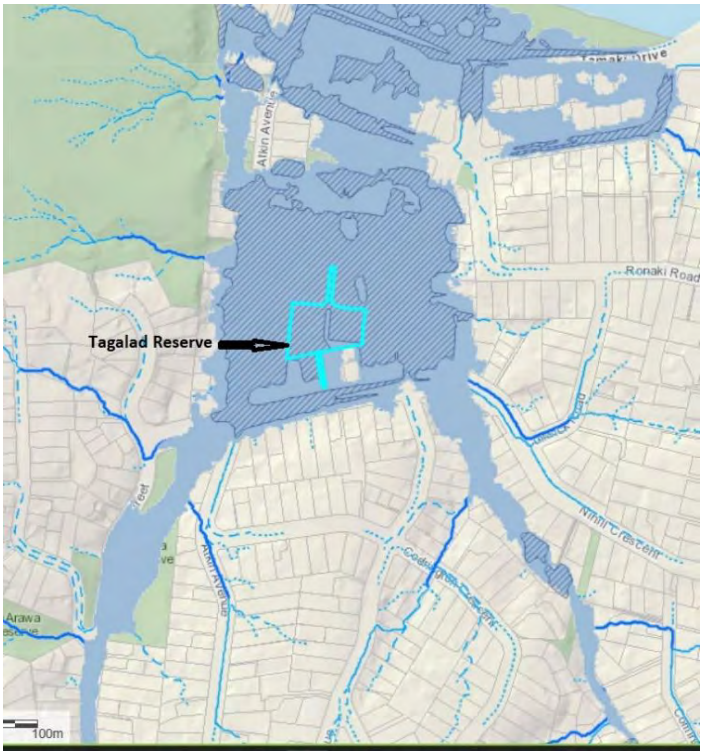


2 events Jan & Feb 2023 -

Slips on Tamaki Drive, Ngapipi Rd and Kepa Rd
Road closures for weeks
Trees down across Kepa Road
Trees down in Madills Farm seriously injuring child
Black Flagged beaches unsafe to swim for weeks



#8014





Perfect spot for nature infrastructure – Tagalad reserve







Mission Bay Urban Forest SH and MHS zone



Kohimarama Forest

Future Development Plan 2023 #8016

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

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Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Disagree

Tell us why

We need both brownfield and greenfield development to keep housing affordable and sustainable, more consultation with the private sector who will design, deliver and live in this housing, massive acceleration of public transport infrastructure.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Agree

Tell us why

Then build this infrastructure. I never owned a car until I lived in Auckland because the public transport is so poor. How are you helping developers deliver high density?

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why

New subdivisions didn't flood, just old ones where infrastructure was inadequate because of historic under funding.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

New subdivisions already do this, look at the freshwater policy.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

More consultation with stakeholders required.

Future Development Plan 2023 #8023

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Disagree

Tell us why

I do not agree with the way the developers are now dividing up land without the infrastructure put in place first , like developments were done 30 years ago , Roading , Sewer Water and Gas were all installed before lots were sold Roads are too narrow , are not straight enough to accommodate large traffic volumes in terms of extra lanes , that would be a result of many of these subdivisions proceeding and become a very large impost onto the ACC and therefore ratepayers . Even if ACC could borrow the money it has to be paid back . This cost should become part of what the developers pay for before they even release sections for sale . This would stop them picking areas that are off the beaten track far from services . Developers do not seem to be accountable , they simply pick the cheapest farmland and present a future 5 year plan to ACC and leave everyone else to deal with the financial mess they leave behind

Arable Land

Developers and land owners should not be allowed to cut farm and food growing land up , removing and selling the topsoil , and turning these productive farms as some proposals put forward for the Franklin / Karaka Area . Cutting up food growing land in Pukekohe will come back to haunt the people of Auckland into the future in many ways .

Green Space and Section sizes .

Auckland is lacking in Green Space so families can bring up their children in a healthy way . Proposed Sections sizes are far too small so families have the area they need to grow some of their own food and have areas for their children to run around in . The current parks in many areas are sometimes unsafe and parents are not happy allowing their kids to go to these places like it was 30-40 years ago . Everyone knows the neighbours business the houses are so close to each other

Proposals for Karaka .

We estimate that there is proposals in for up to 30,000 extra houses from the Papakura to Kingseat . This is doing everything backwards , Roads need to be 4 laned , curves removed , Bridges built Land acquired by ACC before any subdivision is built . Theres no internet , no sewerage , no water . Even the Drury Rd will have a dire effect of Karaka as cars will cross over from Drury Rd up Charles and Blackbridge roads . It takes 2 hrs to drive 6km to the motorway sometimes from Glassons Bridge and there is 5 huge subdivisions underway now as I pen this with no water , sewerage , Fiber , and the winding roads are challenging to say the least from Glassons to Papakura turnoff .
The end result of the above is that developers will expect the Govt and ACC therefore the ratepayers to front up to pay for this infrastructure which I estimate will cost $300m without Land acquisitions under the Public Works Act .

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Disagree

Tell us why
I dont agree that a Local Center is Karaka Village

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why

Because of the anguish that this gives property owners , costs that it incurs to Council and the Govt and the anticipated effects of Climate change to 2025

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

Infrastructure needs to be built first , properties subdivided , property sizes increased and developers need to contribute substantially or pay completely for these costs , this will stop developers choosing cheap farmland far away from infrastructure to clip the ticket , leaving the mess the Ratepayers and ACC to take on further debt to rectify .

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Future Development Plan 2023 #8027

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Agree

Tell us why

Existing urban centres can be intensified more provided the infrastructure is improved to support it. Keep existing rural areas as rural as the costs to intensify them is much greater and Auckland needs numerous pockets of green areas in order to keep its character.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Agree

Tell us why

This approach makes logical sense.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why

This makes logical sense.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

Fine provided it is still cost effective and can be built efficiently and quickly.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

There has been insufficient budget to maintain existing infrastructure which is now similar to that found in undeveloped countries. You must prioritise this.

Comments on the Draft Auckland Future Development Strategy – 2023

Context

No commentary about performance against the development targets in the 2017 FDS v actual land releases. Based on this, does Auckland have sufficient capacity for growth currently? This is critical context.

FDS Strategic Spatial Framework (page 15)

The over-arching challenge should be clear, maintain an adequate supply of developable residential and commercial land. It also needs to be clarified that infrastructure investment does not need to come from Council alone. So, for "Over-arching challenges":

Amend point 1: *"~~Spatial planning~~ Maintaining an adequate supply of development ready land in an uncertain and changing environment"*

Amend point 4 as follows: *"~~Investing in~~ Provision of infrastructure in a financially constrained environment"*

For "Spatial outcomes":

Add an initial dot point: "*Tamaki Makaurau has an adequate supply of development ready land*."

Section 2.3.1 – Spatial planning in an uncertain and changing environment

The uncertainty that we faced in 2017 is not dissimilar to the uncertainty we face now. The focus of this section needs to change to supply of development ready land, and acknowledgement that there is already a significant shortfall due to infrastructure constraints.

Section 2.3.4 – Investing in Infrastructure in a financially constrained environment

Agree with the statement: *"There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years."* This being the case, Council should be open to out-of-sequence development where there are solutions to infrastructure provision.

Page 23 – Principle 5: Enable sufficient capacity for growth in the right place at the right time

Principle 5(a): Acknowledges that it is difficult to estimate where and when growth is likely to occur given the NPSUD requirement for Councils to be responsive to out-of-sequence development. This reinforces the need for Council to be less rigid with sequencing. The following statements should be revised:

- *"Unanticipated or out-of-sequence development create[s] major funding challenges for the Council, where funding of the necessary infrastructure has not been provided by other parties or means."*
- *Consideration of the trade-offs and costs that might occur when development occurs out-of-sequence, ahead of existing priorities, will be applied. For example, Council will support out-of-sequence development where funding for infrastructure can be secured via alternative means."*

Principle 5(b): Add final sentence: *"<u>However, Council could support development outside of urban areas where, for example, the natural environment is protected and a compact urban form can be achieved</u>."*

Principle 5(c): What is the basis for the statement below?

"The future development strategy identifies there is sufficient residential and business development capacity across Tamaki Makaurau".

Section 4.2.2 Future urban areas

Background – It would be helpful if this section set out the number of homes and jobs that have been established within the FUZ since Future Urban Land Supply Strategy 2017 (FULSS) was adopted, and how that compared with the FULSS sequencing.

Key considerations

Funding and financing pressures have increased – How much of the infrastructure required to support the approved private plan changes within the FUZ were funded via Council infrastructure budgets? If out-of-sequence private plan change requests do not use Council infrastructure budgets for infrastructure, then how are they affecting Council priorities? This section needs more clarification.

Way forward

Sequencing, timing and triggers for development – More discussion is requested about the revised timing and why. As a whole everything has pushed back. Figure 13 identifies parts of the FUZ that have either been removed or are under investigation. This requires, as a minimum, some high-level commentary and explanation. For example, what proportion of the land that has been removed was allocated for housing, and what proportion was allocated for jobs?

Focussing council's investment – Private/public infrastructure agreements and targeted rates are a good solution to ensuring that Council's infrastructure budgets aren't impacted by out-of-sequence development. This needs to be acknowledged here.

Figure 13 – Westgate and Drury-Opaheke should be shown as development ready by 2025+, in accordance with Section 4.2.5 (Prioritising areas for development).

Section 4.2.3 Rural areas

Given the uncertainty and planned shrinkage of the FUZ, Council should be open to future plan change applications within the Rural Zone that:

- Can be designed to avoid risk from natural hazards;
- Protect/maintain the natural environment;
- Protect/maintain highly productive land;
- Minimise adverse effects on rural character; and
- Are either:
    - adjacent to existing FUZ/urban areas and/or key transport routes (see note below re Drury/Ramarama), or
    - of a scale that can support commercial activities and a rapid transport system (more than 500 people).

Section 4.2.4 Business areas

Greater access to employment – notes that 46% of jobs are located in and around South Auckland. It should be acknowledged that this is a function of the location of the Airport and because Auckland is north of a large population to the south (Hamilton etc). Therefore, these areas will continue to attract more demand for business than other parts of Auckland.

Figure 16 – Given the growth in the Drury/Ramarama area, it makes sense to extend the "Future Business Area" south of the existing extent that is bound by SH 1 to the east and Great South Road to the west. While this land is currently zoned Rural-Mixed Use, it accommodates smaller titles and a range of uses that are generally not in productive farmland. The location and excellent transport links make it better suited for commercial/industrial development.

Section 4.2.5 Prioritising areas for development

Way forward, Short to medium term priorities (years 1-10) – Westgate and Drury-Opaheke are identified as short-medium term priorities. However, this is not reflected in Figure 13. Timing of release in these in these areas is identified as 2035+. Figure 13 needs to be corrected accordingly.

Figure 18 – Recommend that the FUZ land bound by SH 1 to the east and Great South Road to the west are included in the Spatial Priority for investment (Years 1-10) given the market demand, current activity in the area and good links to transport infrastructure.