Future Development Strategy

Organisations

WRITTEN FEEDBACK
Volume 20

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

Future Development Plan 2023 #8635

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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



AUCKLAND'S FUTURE DEVELOPMENT STRATEGY CONSULTATION FEEDBACK

WHEELER PROPERTY HOLDINGS LTD | JULY 2023

OPĀHEKE



The National Policy Statement on Urban Development (2020) requires Councils to ensure there is at least sufficient housing and business capacity over the next 30 years. Opāheke can provide such capacity.

- Opāheke is an **ideal location for urban development due to its close proximity to key transport links** such as the Papakura and Drury motorway interchanges and train stations
- Opāheke is close to the Papakura Industrial zone (Hunua Road Industrial Estate) and an **ideal location to provide local employment opportunities** to support residential development
- **There is high demand for business land use in this area** evidenced by the number of businesses that are already established; including house building enterprises, self storage yard, house moving and transport businesses, steel fabrication, truck building, car sales and the Veolia Water & Wastewater premises.
- It is close to schools, leisure activities and jobs
- It is growing

OPĀHEKE IS AN IDEAL LOCATION FOR BUSINESS LAND DEVELOPMENT

#8635




VEOLIA


OUT OF SPACE
STORAGE
OUT OF SPACE
STORAGE
STORAGE


TRANS
BUILD
TRANS BUILD
BUILDERS NEEDED
0800 460 307
Birch

LIGHT INDUSTRIAL & COMMERCIAL DEVELOPMENT



Currently there is no spare light industrial or commercial development land in this zone. **Opāheke provides the perfect solution to this shortage**.

Opāheke sits directly adjacent to the current urban boundary providing a logical extension

It presents low-cost infrastructure compared to other areas

Multiple agencies have already invested in significant infrastructure to enable the area to be urbanised

It provides a place for people to live and work, particularly due to high rates of migrant arrivals (161,900 March 2022 – 23 Stats NZ) and identified shortfalls in the sub-regions for business land (Auckland Council, Consultation Draft FDS pg. 31)

These issues are compounded by the fact in the last 10 years previously earmarked light and heavy industrial areas have been reduced.

EXAMPLE:
2013 Drury South Industrial precinct was to provide a substantial area of industrial land (375ha) – this has been reduced by 175ha; the majority of which was rezoned to residential.

OPĀHEKE FULFILLS A VERY REAL NEED AS A PLACE FOR PEOPLE TO LIVE AND WORK

INVESTMENT IN OPĀHEKE HAS ALREADY BEEN MADE





The Opāheke Drury Structure Plan 2019 and Future Urban Land Supply Strategy 2017 identified Opāheke as being development ready in 2028 – 2032.

Many have invested in the area based on this assumption.

01.

Rezoning the area will see business and landowners wait a further 27 years before realising the potential of their land

02.

Given the current environment (economic recession, Covid-19, interest rate increases and increased cost of living) this is untenable

03.

Current central and local government has invested in infrastructure such as the:

- New Zealand Upgrade Transport programme
- Electrification to Pukekohe
- SH1 Papakura to Drury Improvements
- Drury Railway station

This investment has been made on the understanding the area will grow. **Without this growth, such infrastructure will be inefficient.**

A ZONE CHANGE CREATES A COST BURDEN, POOR PLANNING OUTCOMES AND SEES AN UNDER-UTILISATION OF INVESTMENT

RE-ZONING

RE-ZONING WILL CREATE UNCERTAINTY, PLACE AN UNNECESSARY FINANCIAL AND EMOTIONAL BURDEN ON LANDOWNERS AND PUSH PEOPLE OUT OF AUCKLAND.

Long term plans (such as the 2017 Unitary Plan) provide business owners with confidence. We, like many local businesses, have made long term business decisions and investments in Opāheke based on this.

Changing this plan 5-years before it is enacted is entirely unreasonable.

Moreover, there is no real clarity on the **specific reason/s for the change**



A LACK OF AVAILABLE LAND IN GREENFIELD AREAS MAKES IT DIFFICULT FOR BUSINESS TO LOCATE IN AUCKLAND.



This means they move to neighbouring regions with cheaper land / leases

Creates congestion as people commute

Loss of revenue for Auckland Council

Pokeno – Gateway Business Park and Pokeno Village Estate are examples of this

SUMMARY

WHEELER PROPERTY HOLDINGS OPPOSES THE DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY. **SPECIFICALLY:**

01 The delay in Opāheke from 2028 – 2032 to 2050+

02 Auckland Council's proposal to focus investment on urban areas rather than greenfield areas that the Council committed to through Structure planning, Investment & the 2017 Future Urban Land Supply Strategy

THE GROUNDS TO THIS OPPOSITION

01 Opāheke is an ideal location for business development due to its close proximity to the Papakura Industrial Zone, key transport links, schools and leisure activities

02 It sits directly adjacent to the current urban boundary, providing a logical extension

03 There is HIGH demand for business land in this area

04 Investment in Opāheke has already been made by local businesses such as ours. Multiple agencies have developed significant infrastructure. To delay would be an inefficient use of this, while putting local businesses and land-owners under significant pressure. Being forced to wait a further 27 years to realise the potential of their land and investment is untenable.

05 The area needs a supply of business land. Without it Opāheke cannot thrive and the benefits are enjoyed by areas outside of the Auckland Boundary (such as Pokeno).

06 The Auckland Future Development Strategy as it relates to Opāheke directly contravenes the National Policy Statement on Urban Development which requires Council to ensure there is sufficient housing and business capacity for the next 30 years

Feedback on the Consultation draft Auckland Future Development Strategy June 2023 - Wheeler Property Holdings

1. Executive summary

Wheeler Property Holdings own two properties in the Opaheke, 201 Opaheke Road and 262 Sutton Road. Both of these properties are zoned Future Urban. These properties were purchased in 2016 on the assumption that land would be available for development by 2032 as identified in the Future Urban Land Supply Strategy (FULSS) 2017 and Drury Structure Plan 2019. Wheeler Property Holdings oppose the Consultation Draft Auckland Future Development Strategy. Specifically they oppose the delay to the development of Opaheke from 2028-2032 to 2050+. They also oppose Auckland Council's proposal to focus investment on the urban area rather than greenfield areas that Council have committed to through Structure Planning, Investment and the FULSS.

1.1 Decision sought

The decision sought by Wheeler Property Holdings:

1. Retain the 2028-2032 rezoning of Opaheke.
2. Rezone the Opaheke Future Urban Area to light industry zone

2. Ideal location for business land development

Opaheke is an ideal location for urban development due to the close proximity to Papakura and key transport links such as the Papakura and Drury motorway interchanges and the new Drury Station. Opaheke is also in close proximity to the Papakura Industrial zone (Hunua Road Industrial Estate) and an ideal location to provide local employment opportunities to support residential development in the south, particularly nearby growth areas. There is high demand for business land uses in this area evidenced by the number of businesses that have already established in Opaheke area including self-storage yard, house building enterprises, house moving and transport businesses, steel fabrication business, truck building and car sales.

3. Lack of certainty to developers and landowners

The Opaheke Drury Structure Plan 2019 and the Future Urban Land Supply Strategy 2017 (FULSS) identified Opaheke as being development ready in 2028-2032. The Consultation draft Auckland Future Development Strategy 2023-2053 identifies the proposed timing for urban development of Opaheke as 2050+ [1]. Infrastructure was cited for delaying this area, specifically the Mill Road upgrade, Rapid Transit, and the Southern Auckland Wastewater Service Scheme[2] . A large area of future urban zoned land has been proposed for removal due to natural hazards shown as the dark grey area on Figure 1.

[1] Auckland Council, Consultation Draft Auckland Future Development Strategy 2023-2053 *Appendix 8 Future Urban Assessment Area Summary page 38*

[2] Auckland Council, Consultation Draft Auckland Future Development Strategy 2023-2053 page 27 of Appendix 6 Future Urban Instructure Triggers

Figure 1 Consultation Draft Auckland Future Development Strategy, Appendix 8 page 46

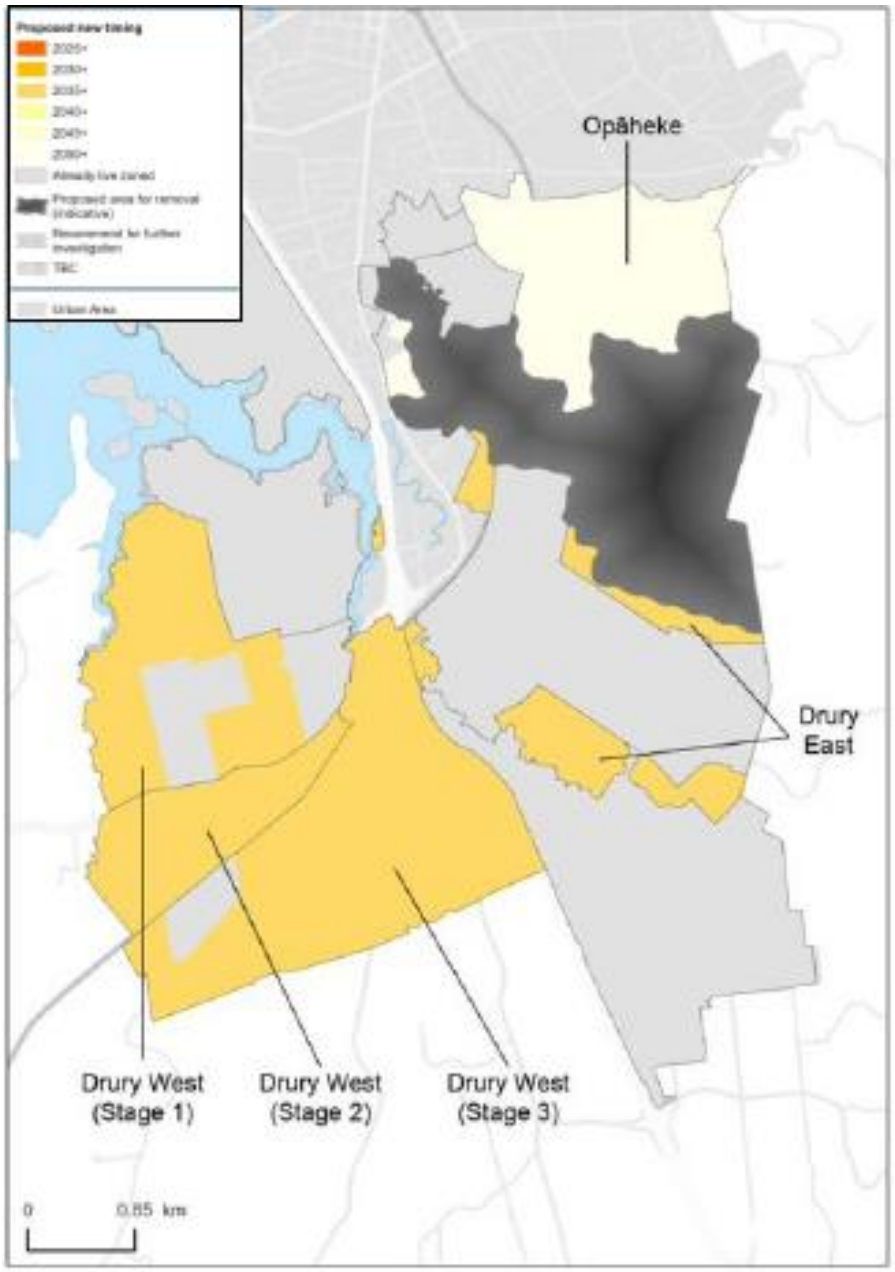


Figure 44 - Proposed timing and approach to Drury & Ōpaheke future urban areas

Appendix Page 46

Landowners expected that Opaheke would be rezoned for urban development between 2028-2032 as Opaheke has been earmarked for development since 2017. They have invested in the area on the assumption that their land would generate a return by 2032, supported by the identification of this area in the FULSS. It is unreasonable to delay the live zoning of Opaheke for another 27+ years while still restricting the type of development that can occur on future urban land. To delay the rezoning of this land creates uncertainty for businesses and landowners that may have to wait more than 27 years before they can realise the potential of their land. The financial implications of delaying the

development of Opaheke is also significant particularly due to recent external factors such as changes in supply and demand, economic recession, covid 19 and interest rate increases.

4. Poor planning outcomes and underutilisation of investment in Opaheke

4.1 Poor Planning outcomes

The Drury Opaheke Structure Plan was completed in 2019 and enabled Plan Changes (PC) to advance ahead of this 2028-2032 time frame (including PC 48 Drury Centre Precinct, PC 49 Drury East Precinct, PC 50 Waihoehoe Precinct and PC 51 Drury 2 Precinct). To delay the development of the remaining FUZ in Opaheke will create poor landuse outcomes and would be contrary to the National Policy Statement Urban Development (NPS: UD). The NPS: UD requires well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future (objective 1).

Employment land is required to support population growth particularly due to high rates of migrant arrivals which Stats NZ provisional estimates are at 161,900[3] from March 2022-March 2023. Auckland Council notes that from the initial results of the Business Capacity Assessment that there could be shortfalls in the sub-regions for business land particularly for land-extensive sectors in the short to medium term.[4] The NPS: UD requires that at all times, Council provides at least sufficient development capacity to meet expected demand for business land over the short term, medium term, and long term (Policy 2). Auckland Council also has an obligation to publish a Housing Business Development Capacity Assessments (HBS) every three years and this is to inform Future Development Strategy. The last HBS was published in 2017. Council is also required to undertake quarterly monitoring of available data on business land and take action where there is identified insufficient business land in the short, medium and long term.

All light industrial areas shown on the Drury Opaheke Structure Plan map 2019 shown as light industrial have remained Future Urban. In the last 10 years previously earmarked light and heavy industry areas in the south have been reduced by either plan changes or special housing areas. For example in 2013 the Drury South Industrial Precinct was to provide a substantial area of industrial land (375ha). However, Plan changes and Special Housing areas have reduced industrial zoned land in Drury south by 175ha. The majority of this land was rezoned residential.

A lack of supply of business land in greenfield areas makes it difficult for businesses to locate in Auckland, due to high land/lease costs associated with the development of brownfield sites. This means Auckland's residents/businesses have been displaced to neighbouring regions which then results in traffic congestion when people commute into Auckland for work/live. This also results in a loss of potential rates revenue for Auckland Council as residents are lost to neighbouring regions e.g Pokeno Village Estate and the Gateway Business Park Pokeno.

Industrial activities cannot be easily accommodated on brownfield sites due to specific requirements. These include large sites, close proximity to the major transport connections for logistics, and due to the potential for greater reverse sensitivity effects associated with closer proximity of sensitive sites for residential type activities or schools.

[3] https://www.stats.govt.nz/information-releases/international-migration-march-2023/#annual
[4] Auckland Council, Consultation Draft Auckland Future Development Strategy 2023-2053, page 31.

4.2 Underutilisation of investment

Multiple agencies have invested in a significant level of infrastructure to enable the Drury and Opaheke area to be urbanised. This investment includes the New Zealand Upgrade Transport programme, the electrification to Pukekohe, improvements to SH1 Papakura to Drury, the new Drury Railway station, new arterials, local roads and supporting infrastructure. The Supporting Growth Alliance (Auckland Transport and NZTA) are also in the process of securing or have secured land for transport infrastructure in the Opaheke area. A new north south public transport arterial between Drury and Opaheke has been designated (Designation 1839). The purpose of the FULSS was to integrate infrastructure with landuse, however, to delay the development of the remainder of Opaheke would be an inefficient use of infrastructure (which was designed for the full build out of this area) and would undermine the significant level of investment that has been made.

5. Additional costs/restrictions on landowners/developers in the FUZ

5.1 Consenting costs

The use of future urban land is constrained by the Future Urban zone which limits the scale and types of activities to those that do not compromise future urban development. The range of activities that are permitted in the Future Urban zone are limited to rural types of activities. Often sites in the Future Urban zone are no longer suitable for rural uses such as farming, or horticulture due to lot size and/or soil quality.

Auckland Council has imposed restrictive conditions on resource consents in the Future Urban Zone which limit the duration of activities to typically 10 years. Council also imposed resource consent conditions that require buildings or structures to be removed before resource consents expire. Restrictive conditions were used to align with the timing of rezoning identified in the FULSS. It also means that landowners have to apply for additional resource consents to continue their activities onsite beyond the 10 year timeframe. This also has cost implications for landowners including additional Council resource consent fees and costs associated with preparing an application which can often involve several consultants for traffic, stormwater, wastewater, landscape, noise etc. It is unclear how Council will deal with these restrictive conditions on resource consents if it pushes out the development of this area and if they will waiver consent fees or compensate landowners where their activities have been restricted by resource consent conditions relating to the timing of urban development.

6. Decision sought

Wheeler Property Holding seeks the following changes to the Future Development Strategy:

1. Retain timeframe for rezoning of Opaheke to be consistent with the Drury Structure Plan being development ready in 2028-2032.
2. Rezone Opaheke Future Urban Zone to light industry.

6.1 Reasons for decision sought

The reasons Wheeler Property Holdings oppose the Development Strategy are:

6.1.2 Opaheke ideal location for urban development of business land

- **Close proximity to Papakura and the Papakura industrial zones**
- **Close proximity to key transport infrastructure** the Papakura and Drury interchanges and the new Drury train stations.
- **Provides employment land to residents in the south** including growth areas in the south

6.1.3 Lack of certainty to landowners/developers

- **Timing and amount of financial return on their investment.** Land was purchased on the basis of rezoning to a live zone between 2028-2032
- **Timing of public infrastructure.** This makes it difficult to know how to invest/use before it is live zoned e.g. Landowners have invested in onsite infrastructure on the basis that it will be replaced by 2028-2032 with public infrastructure.
- **The increased holding costs of land** due to increases in interest rates, Council rates and insurance costs.

6.1.5 Poor planning outcomes and underutilisation of investment

- **Traffic congestion – displacement of Auckland's residents to neighbouring regions which then results in traffic congestion when people commute into Auckland for work.**
- **Loss of rates revenue for Auckland Council as** residents are lost to neighbouring regions e.g Pokeno Village Estate and the Gateway Business Park Pokeno.
- **Underutilisation of investment in Drury and Opaheke –** electrification of the railway line, new Drury Station, upgrades to the local road network and State Highway if the Opaheke area is delayed.
- **Shortage of business land and the need for employment land within the sub-regions.**

6.1.4 Additional costs/restrictions on landowners/developers in the FUZ

- **To provide onsite infrastructure -** Landowners will need to upgrade onsite infrastructure to increase capacity if public infrastructure is not provided until 2050+
- **Associated with consenting development in the Future Urban zone** due to restrictive range of activities and buildings that are allowed in the FUZ.
- **Associated with applying for new resource consents in the Future Urban zone** due to restrictive consent conditions imposed on resource consents(as detailed above).

#8635

Help us shape Auckland's future growth

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

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

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

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

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

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

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

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

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

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

Your details

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

First name: [redacted] Last name: [redacted]

Email address or postal address: [redacted]

Your local board: Papakura

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

☒ Yes ☐ No Name of organisation/business: [redacted]

Important privacy information

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

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

What gender are you?

- [x] Male
- [ ] Female
- [ ] Another gender (please specify): _____

What age group do you belong to?

- [ ] Under 15
- [ ] 15-17
- [ ] 18-24
- [ ] 25-34
- [ ] 35-44
- [x] 45-54
- [ ] 55-64
- [ ] 65-74
- [ ] 75+

Which ethnic group(s) do you feel you belong to? (Please select as many as apply)

- [x] Pākehā/NZ European
- [ ] Other European
- [ ] Māori
- [ ] Cook Islands Māori
- [ ] Samoan
- [ ] Tongan
- [ ] Indian
- [ ] Chinese
- [ ] Southeast Asian
- [ ] Other (please specify): _____

Would you like to subscribe to any of the following (tick all that apply):

- [ ] People's Panel – to take part in council surveys
- [ ] OurAuckland – your weekly guide to what's happening in Auckland
- [ ] Auckland Conversations - free public events, offering ideas, inspiration and action for world-class cities

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

Your feedback (all questions are optional)

Focusing growth

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

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

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

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

Tell us why

Refer to attached 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?

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Tell us why

Refer to attached feedback 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?

- [X] Agree
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Tell us why

Refer to attached documentk

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?

- [X] Agree
- [ ] Disagree
- [ ] Other
- [ ] 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?

Refer to attached document

Need more room? You can attach extra pages.

See attached document.

Future Development Plan 2023 #8636

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Your feedback

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Other feedback

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

Please see attached submission

FUTURE DEVELOPMENT STRATEGY

SUBMISSION BY THE LIFECARE RESIDENCES : PAERATA

19 July 2023

1. Submission

This is a submission by Lifecare Residences 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.

Lifecare Residences is a New Zealand owned retirement village company with operations in New Zealand and the UK. It is the owner of a 22 ha block of land at Paerata which is currently subject to an application for a comprehensive retirement village.

The map below shows the land holdings of the landowner.

Diagram 1: Land Ownership



2. Summary of Submission

Lifecare Residences 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. Fails to adequately take account of the particular needs especially land area, of the retirement village industry.

c. 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;

d. 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

e. 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 submitters have 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.

Lifecare Residences has a resource consent application before the Council which seeks to establish a village providing independent living, serviced apartments, mind care (dementia) and full care services. This plan change provides a proposal which is fully self-contained in terms of infrastructure.

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.
- Further exacerbating congestion issues in Auckland by not locating employment land close to where people live.

- 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 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 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. **The particular needs of the retirement industry**

(a) The FDS fails to take account of special land use requirements such as the retirement village industry.

(b) To provide for a full service retirement activity with the on-site amenities that are critical to providing a high quality of amenity for residents; most villages will need 4-5ha of land. This is the area required for the provision of independent living, serviced apartments, mind care and full care services, plus the associated spaces.

(c) The retirement village also needs to provide for a broad range of indoor and outdoor amenity and recreational spaces which are part of the active programmes of modern retirement villages. This will include pools, outdoor activities such as bowls and gardening.

(d) Compounding this, the land needs to be of a reasonable contour to enable residents of the village with mobility issues to be able to enjoy the facility.

(e) People retiring will often want to live within the communities they have had long established association with. This is often where friends and family are located and where there is a familiarity with the local services and the community.

(f) The retirement industry is finding it increasingly difficult to identify sites within the existing urban area. However, it remains important that such sites can be found and developed, because of the need to locate retirement facilities embedded within the community.

(g) By the same token, there is high demand for facilities on the periphery of the metropolitan area and in satellite townships such as Pukekohe. People retiring from the rural community typically want a retirement village which provides all the services and whole of life care; but want to remain within their rural environment. This is what Lifecare Residences will develop at Paerata.

(h) The key issue for the FDS is to provide sufficient flexibility in the provision of land to meet the social needs of the community. This is not simply a case of solving everybody's problem through infill housing within brownfields development.

(i) Diagram 2 shows the proposed village at Paerata illustrating the extensive land requirements.

Diagram 2 Garden Hills Paerata Masterplan,



11. **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

12. 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. For instance, Lifecare Residences is fully developing footpaths, curb and channel and berms along its 750m frontage.

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.

13. **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.

Lifecare Residences will construct a self-contained wastewater (and water) system for collection, treatment and land disposal of all wastewater generated by its facility. The application also identifies the opportunity to size the plant t to accommodate a portion of the Paerata West community immediately north of the village.

There may also be capacity opportunities in the existing infrastructure services to Paerata East, although it is acknowledged that the highly unusual commercial arrangement around this infrastructure line will complicate matters.

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.

14. **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.

15. **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:

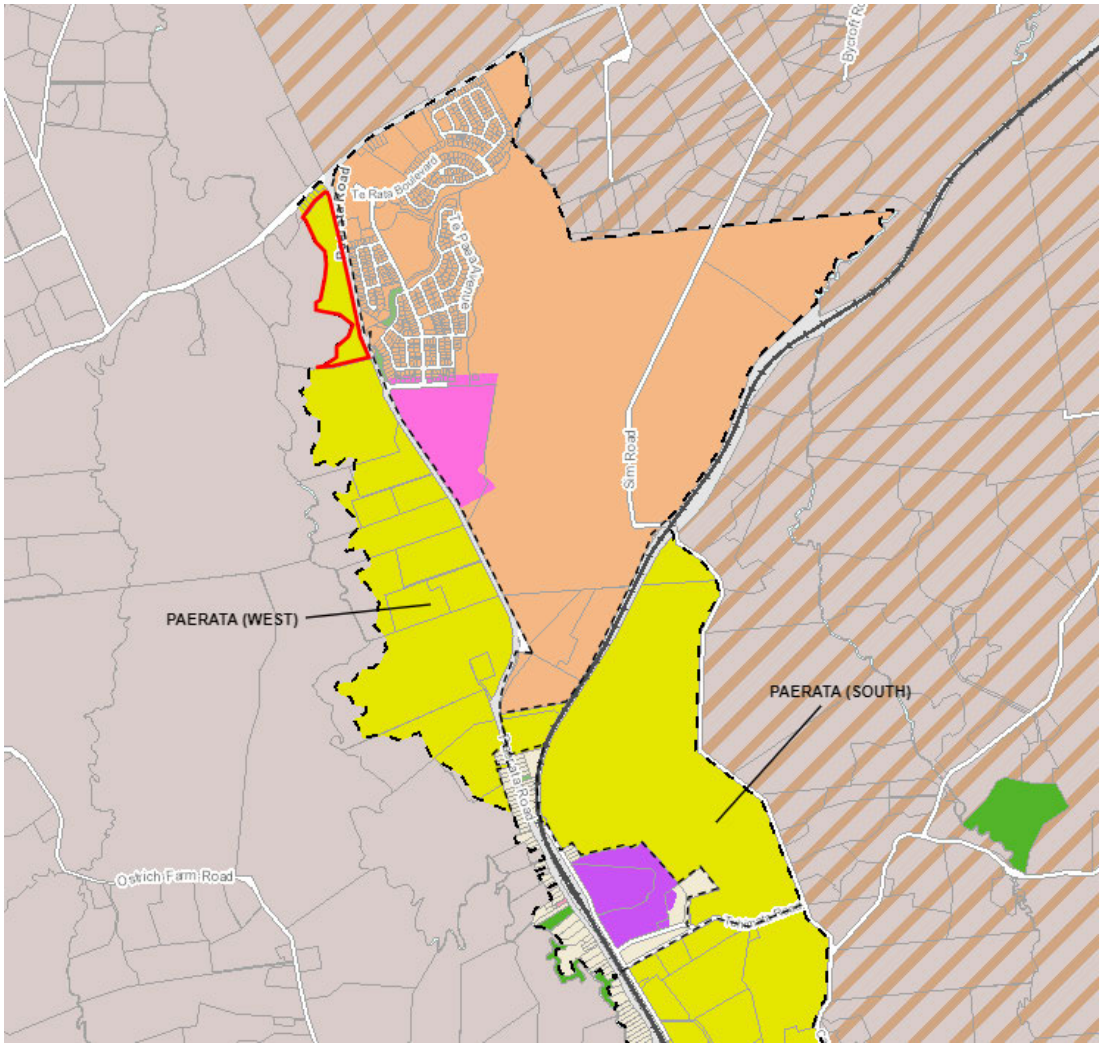
- The desire for different people to enjoy different lifestyles.
- The significant economic opportunity and employment generation in the Franklin part of the Auckland Region.

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.

16. **Requested change**

This submission is seeking that Paerata west and south including the submitter's land be retained as development ready in the current cycle (2023-2030).



D. WIDER IMPLICATIONS OF FDS

17. **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.

18. 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 every 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.

19. **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*

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

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 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

20. The submitters request:

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

(b) That all of Paerata (west and south) be shown as development ready in the 2023-2030 time period as currently shown in the FULSS.

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

(d) there be meaningful consultation with the community including the development and retirement sectors;

(e) 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;

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

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

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

(i) 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;

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