Future Development Strategy

Organisations

WRITTEN FEEDBACK
Volume 9

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Future Development Plan 2023 #8542

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

Please see attached submissions.

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please see attached submissions.

#8542

CIVILPLAN CONSULTANTS

Submission on the Draft Future Development Strategy 2023

To: Auckland Council

Name of Submitter: [redacted]

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Manukau City
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Attn: Aaron Grey

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

The submitters, [redacted], are the owners of land at [redacted] Gatland Road, [redacted] Gatland Road and [redacted] Great South Road, Opaheke. They are directly affected by the draft FDS's decisions related to the Opaheke future urban area.

1. General Submission

The submitters have a number of general concerns with the draft FDS. This includes:

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

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

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

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

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

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

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

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

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

1.1 Sufficient Development Capacity Assessment

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

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

1.2 Sufficient Development Capacity in Demand in Future Urban Areas

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

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

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

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

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

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

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

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

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

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

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

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

1.3 Role of Private Plan Changes

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

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

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

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

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

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

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

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

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

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

1.4 Implications For Future Urban Zoned Land

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

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

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

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

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

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

1.5 Offsetting Principle

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

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

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

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

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

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

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

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

On this basis, the submitters seek that the draft FDS amend its offsetting principle as follows:

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

1.6 Infrastructure Integration

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

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

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

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

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

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

1.7 Infrastructure Funding

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

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

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

1.8 The Impact of Uncertainty

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

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

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

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

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

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

2. Site-Specific Submission

The land to which this submission specifically relates to is henceforth referred to as 'the Slippery Creek land'. This land is generally those properties currently within the within the Future Urban Zone under the AUP that are to the east of Great South Road and to the west of Slippery Creek, as shown in Figure 1, below. This includes the land owned by the submitters. Other than where it adjoins existing urban zones, the land's defensible boundary is Slippery Creek.

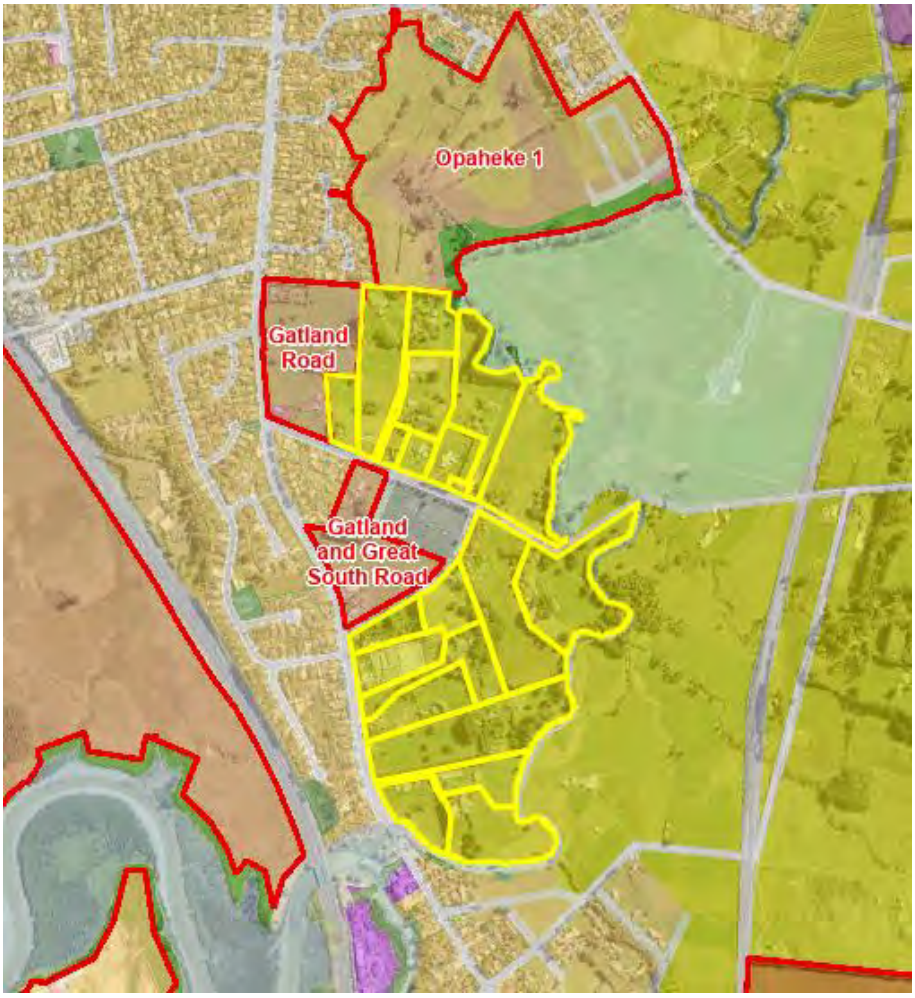


Figure 1: Location and Extent of the Slippery Creek Land (Bordered in Yellow)

The Slippery Creek land was identified in the Future Urban Land Supply ('FULSS') as part of the "Opaheke/Drury" area, to be development ready between 2028 and 2032. Under the draft FDS, the Slippery Creek land has been identified as part of the "Opaheke" area, part of which is lived zoned (refer below), part of which is proposed to be removed as a future urban area and part of which is not planned to support development prior to 2050+. That part that is be removed is described as "*the area associated with the Slippery Creek flood plain and some land to east adjacent to the floodplain*".

It is noted that the Opaheke future urban area also includes the following live zoned areas, all of which are located between the existing urban area and Slippery Creek – refer to Figure 1, above, for their location:

- The Opaheke 1 Precinct, as a result of a plan variation under the Housing Accords and Special Housing Areas Act 2013, approved in December 2016.
- The Gatland Road Precinct, as a result of a private plan change request (Plan Change 58), made operative in March 2022.
- The Gatland and Great South Road Precinct, as a result of a private plan change request (Plan Change 52), made operative in December 2021.

These private plan change requests demonstrate that it is commercially feasible to provide for housing within Opaheke and indicate that this is reasonably expected to be realised. In terms of infrastructure-readiness, the infrastructure triggers included in both Plan Changes 52 and 58 demonstrate that these are relatively minor matters (such as a frontage upgrade to Great South Road) that can be provided for alongside development (at resource consent stage) rather than being necessary prior to applying a live urban zone.

Appendix Page 30 of the draft FDS specifies the reasons that the Opaheke future urban area is recommended for partial removal. This is limited to:

- Considerations of significant hazard constraints associated with flooding, slope stability, liquefaction and fault lines.
- Following removal of the above hazard areas, urban form considerations, noted to be to the east of the Slippery Creek floodplain (and therefore not relevant to the Slippery Creek land).

The submitters accept that the land closest to Slippery Creek is subject to natural hazard risks associated with flooding, especially to the east of the stream corridor. However, at the Slippery Creek land (to the west of the stream corridor), the indicative extent of land proposed to be removed by the draft FDS extends much further than the 1% AEP floodplain (relying on the most up-to-date information available on Auckland Council's Geomaps). Refer to Figure 2, below.

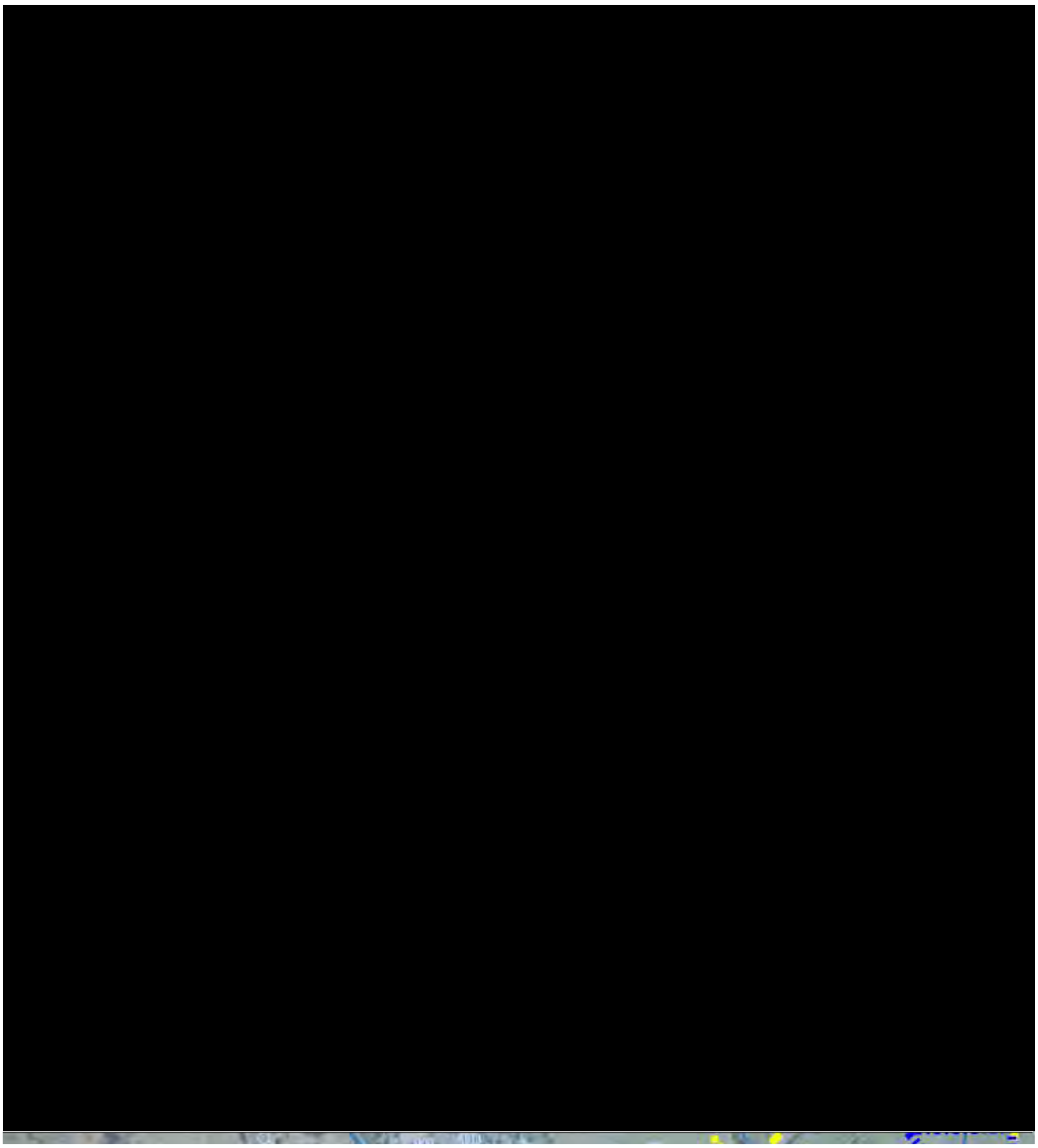


Figure 2: The Area Proposed for Removal Compared with the 1% AEP Floodplain

It is estimated that approximately 18 ha of the Slippery Creek land that is not subject to the 1% AEP floodplain is proposed to be removed from the Opaheke future urban area by the draft FDS. This is estimated to be a loss of development capacity of at least 500 dwellings. Further to this, urban development of land could provide the opportunity to rationalise the floodplain extents in order to reduce flooding risks further and provide for additional development capacity with reduced risk of natural hazards.

The other natural hazard risks listed were assessed in the geotechnical hazards report prepared by Riley Consltants Limited in 2018 for Auckland Council's Drury-Opaheke Structure Plan. In relation to the Slippery Creek land, this geotechnical report identified that:

- The land immediately adjoining Slippery Creek is subject to high settlement potential. This generally coincided with or was less than the extent of the 1% AEP floodplain shown in Figure 2, above.

- The remainder of the Slippery Creek land is subject to medium settlement potential, but this was the same category applicable to the overwhelming majority of the Drury West area, where the FDS proposes that development will proceed to occur.

- All of the Slippery Creek land is subject to medium liquefaction potential, but this was the same category applicable to the overwhelming majority of the Drury West area, where the FDS proposes that development will proceed to occur.

- The Slippery Creek land is a significant distance (over 2 km) from the Drury fault line.

Therefore, there is considered to be insufficient justification for the draft FDS to recommend removal of that part of the Slippery Creek land that is not subject to the 1% AEP floodplain.

This indicative area recommended to be remove is also not consistent with the description of the area on Appendix page 30 of "*the area associated with the Slippery Creek flood plain and some land to east adjacent to the floodplain*" – as specified above, the land is beyond that associated with the flood plain and is not to the east of this flood plain.

While it is understood that the extent of the land recommended for removal is indicative only, it is clearly not aligned with the 1% AEP floodplain extent in this area, being different by up to 200 m, or (in most instances) existing property boundaries. Therefore, Council has intentionally determined to propose a new boundary position that is not further clarified or justified by the draft FDS.

It is also considered inappropriate for the boundary of the FUZ to follow the current floodplain extent, as this has the potential to change as a result of detailed flood modelling or potential flood mitigation works. The submitters indicate their willingness for mitigation measures to be established within the Slippery Creek land to reduce flood hazards, to the extent this is possible (to be determined through a plan change process). The defensible boundary for zoning in the area is Slippery Creek itself, and therefore (should the land on the eastern side of the creek be removed) the Rural Urban Boundary should follow the creek itself. The land to the west of the creek (within the Slippery Creek land) that is subject to the 1% AEP floodplain would be understood to have limited or no development potential, noting that this land would be still subject to controls in section E36 of the AUP regardless of its zoning, and any plan change to create live zones would be highly likely to establish additional controls (through a precinct) in order to be approved.

In terms of the land that is not recommended to be removed by the draft FDS, a development-ready timeframe of 2050+ is now proposed, being around 20 years later than the timeframe in the FULSS. The reason for this delay is specified to be due to infrastructure requirements.

Appendix Page 27 identifies Mill Road, Frequent Transit Network and the Southern Auckland Wastewater Service Scheme as key infrastructure projects to support development at Opaheke. In relation to each:

- Mill Road is identified in Appendix 3 the draft FDS as a Decade Three (2043+) project. While the Mill Road corridor will directly run through the large part of the Opaheke future urban area that is to remain to the south of the Hunua industrial area, Mill Road will not directly serve the Slippery Creek land. Plan Changes 52 and 58 have also demonstrated that this project is not necessary prior to urban development of nearby land.

- 'Frequent Transit Network' is not listed in Appendix 3 of the draft FDS. It is understood that this refers to South Auckland FTNs recently consulted on by Supporting Growth (for route protection purposes). In relation to the Opaheke future urban area, one route is along Great South Road and the other is along a new arterial road between the Hunua industrial area and Drury (through the Opaheke future urban area in that vicinity). For the Slippery Creek land, only the Great South Road route would be of direct benefit. In this instance, Great South Road is already subject to a frequent bus service (route 33). Although the addition of bus lanes is accepted to have additional public transport benefits, the Slippery Creek land is already well served by frequent public transport, and it is considered unnecessary to delay all development until the full Great South Road FTN project is delivered.

- The Southern Auckland Wastewater Service Scheme is identified in Appendix 3 of the draft FDS as a Decade One (2023+) project. This indicates that the Slippery Creek land will soon be infrastructure-ready in relation to wastewater servicing. In addition, Plan Changes 52 and 58 have also demonstrated that this project is not necessary prior to urban development of nearby land.

Therefore, the draft FDS does not provide any clear rationale for delaying the timeframe for development of the Slippery Creek land from 2028-2032 (as per the FULSS) to 2050+. The submitters consider that a timeframe of 2025+ would be more appropriate.

On this basis, the submitters seek that:

- None of the Slippery Creek land be included in that land that the draft FDS recommends removing from the Future Urban Zone.

- The Slippery Creek land be treated as a distinct future urban area, separate to the (remaining) Opaheke future urban area.

- The Slippery Creek future urban area be identified as short or medium term development capacity (2025+).

3. Relief Sought

As outlined in the sections above, the submitter request the following relief:

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

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

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

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

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

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

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

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

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

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

- That none of the Slippery Creek land be included in that land that the draft FDS recommends removing from the Future Urban Zone.

- That the Slippery Creek land be treated as a distinct future urban area, separate to the (remaining) Opaheke future urban area.

- That a Slippery Creek future urban area (as per the above) be identified as short or medium term development capacity (2025+).

Signature: [redacted].....

Aaron Grey – Associate, CivilPlan Consultants Ltd
on behalf of [redacted]

Date: 31 July 2023

[redacted]

CIVILPLAN CONSULTANTS

SUFFICIENT DEVELOPMENT CAPACITY IN AUCKLAND

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

1. Introduction

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

2. Requirements for Providing Sufficient Development Capacity

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

- Under clause 3.13(1)(a)(ii), that an FDS must set out how a local authority intends to provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand.
- Under clause 3.13(2)(a), that every FDS must spatially identify the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3.

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

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

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

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

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

3. Plan-enabled Capacity

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

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

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

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

4. Infrastructure-Ready Capacity

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

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

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

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

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

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

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

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

5. Feasible Capacity

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

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

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

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

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

6. Capacity That is Reasonably Expected to be Realised

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

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

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

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

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

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

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

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

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

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

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

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

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

6.1 Case Study – Pakuranga THAB

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



Figure 1: Pakuranga THAB Case Study Area

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

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

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

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

- A floor area per storey of 50% of the net site area.
- A building height of four storeys.
- A floor area per dwelling of 120 m².
- All results for each site rounded down.

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

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

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

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

Table 1: Actual Development Compared to Maximum Capacity

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

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

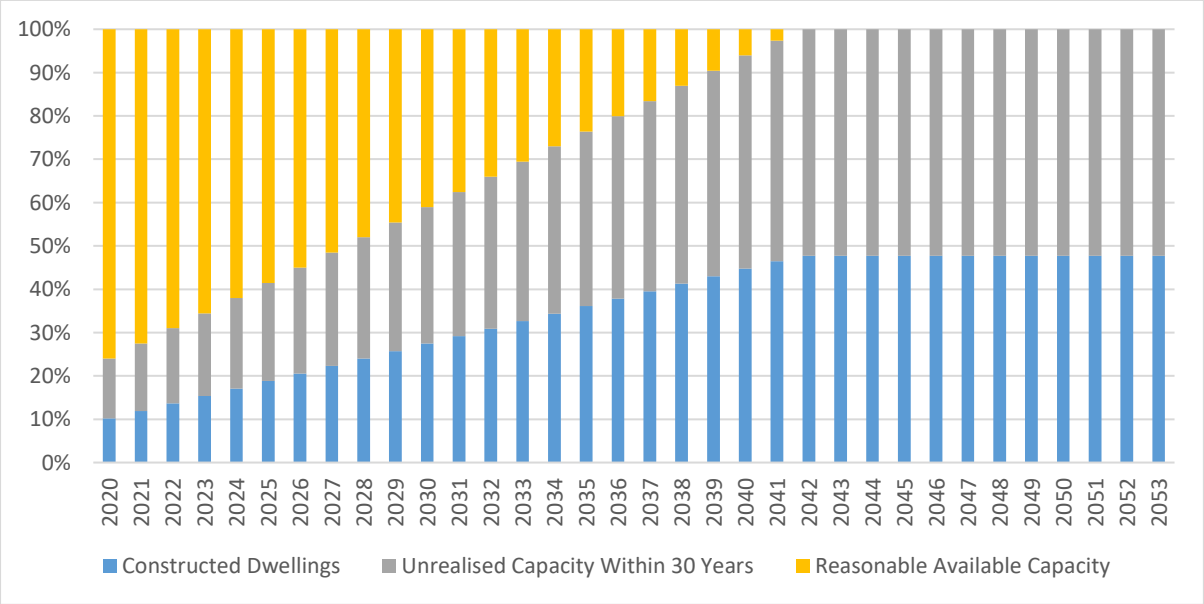
Assuming that a constant uptake of development capacity occurs in the future, a net increase of 20 dwellings per year within this case study area can be confirmed. However, a net increase in the number of dwellings would coincide with an increase in capacity that would be unrealised within the next 30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

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

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

This is illustrated on Chart 1, below.

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



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

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

7. Conclusion

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

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

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

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

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Table 2:
Sites within the Pakuranga THAB Case Study Area

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

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

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Dwelling Count 2020	Dwelling Count 2023	Site Address	Title Identifier	Title Type	Title Age	Site Area	Maximum Capacity*
102	102	7 Bennett Road Pakuranga Auckland 2010	728814	Freehold	18/05/2016	507 m²	8 dwellings
103	103	7A Bennett Road Pakuranga Auckland 2010	728815	Freehold	18/05/2016	496 m²	8 dwellings
104	104	4A Bennett Road PAKURANGA 2010	810292	Freehold	16/05/2018	374 m²	6 dwellings
105	105	4B Bennett Road PAKURANGA 2010	810293	Freehold	16/05/2018	367 m²	6 dwellings
106	106	4C Bennett Road PAKURANGA 2010	810294	Freehold	16/05/2018	401 m²	6 dwellings
107	107	2A Bennett Road PAKURANGA 2010	810297	Freehold	16/05/2018	389 m²	6 dwellings
108	108	2B Bennett Road PAKURANGA 2010	810296	Freehold	16/05/2018	352 m²	5 dwellings
109	109	2C Bennett Road PAKURANGA 2010	810295	Freehold	16/05/2018	354 m²	5 dwellings
					Total Dwellings on 2000-2020 Titles:		30
					Total Max Capacity of 2000-2020 Titles:		190
					Total Net Capacity of 2000-2020 Titles:		160
		2020-2023 Development Sites					
110		28 Reeves Road and 25-37 Lewis Road				959 m²	15 dwellings
	110	28 Reeves Road PAKURANGA HEIGHTS 2010	933948	Freehold	30/07/2020		
	111	37 Lewis Road PAKURANGA HEIGHTS 2010	933949	Freehold	30/07/2020		
	112	35 Lewis Road PAKURANGA HEIGHTS 2010	933950	Freehold	30/07/2020		
	113	33 Lewis Road PAKURANGA HEIGHTS 2010	933951	Freehold	30/07/2020		
	114	31 Lewis Road PAKURANGA HEIGHTS 2010	933952	Freehold	30/07/2020		
	115	29 Lewis Road PAKURANGA HEIGHTS 2010	933953	Freehold	30/07/2020		
	116	27 Lewis Road PAKURANGA HEIGHTS 2010	933954	Freehold	30/07/2020		
	117	25 Lewis Road PAKURANGA HEIGHTS 2010	933955	Freehold	30/07/2020		
111		3A to 3F Ayr Road				911 m²	15 dwellings
	118	3A Ayr Road PAKURANGA 2010	962329	Freehold	27/04/2021		
	119	3B Ayr Road PAKURANGA 2010	962330	Freehold	27/04/2021		
	120	3C Ayr Road PAKURANGA 2010	962331	Freehold	27/04/2021		
	121	3D Ayr Road PAKURANGA 2010	962332	Freehold	27/04/2021		
	122	3E Ayr Road PAKURANGA 2010	962333	Freehold	27/04/2021		
	123	3F Ayr Road PAKURANGA 2010	962334	Freehold	27/04/2021		
112		1/11 to 7/11 Lewis Road				822 m²	13 dwellings
	124	1/11 Lewis Road PAKURANGA HEIGHTS 2010	986211	Freehold	9/06/2021		
	125	2/11 Lewis Road PAKURANGA HEIGHTS 2010	986212	Freehold	9/06/2021		
	126	3/11 Lewis Road PAKURANGA HEIGHTS 2010	986213	Freehold	9/06/2021		
	127	4/11 Lewis Road PAKURANGA HEIGHTS 2010	986214	Freehold	9/06/2021		
	128	5/11 Lewis Road PAKURANGA HEIGHTS 2010	986215	Freehold	9/06/2021		
	129	6/11 Lewis Road PAKURANGA HEIGHTS 2010	986216	Freehold	9/06/2021		
	130	7/11 Lewis Road PAKURANGA HEIGHTS 2010	986217	Freehold	9/06/2021		
113		1/8 to 8/8 Reeves Road				924 m²	15 dwellings
	131	1/8 Reeves Road PAKURANGA HEIGHTS 2010	960582	Freehold	20/06/2021		
	132	2/8 Reeves Road PAKURANGA HEIGHTS 2010	960583	Freehold	20/06/2021		
	133	3/8 Reeves Road PAKURANGA HEIGHTS 2010	960584	Freehold	20/06/2021		
	134	4/8 Reeves Road PAKURANGA HEIGHTS 2010	960585	Freehold	20/06/2021		
	135	5/8 Reeves Road PAKURANGA HEIGHTS 2010	960586	Freehold	20/06/2021		
	136	6/8 Reeves Road PAKURANGA HEIGHTS 2010	960587	Freehold	20/06/2021		
	137	7/8 Reeves Road PAKURANGA HEIGHTS 2010	960588	Freehold	20/06/2021		
	138	8/8 Reeves Road PAKURANGA HEIGHTS 2010	960589	Freehold	20/06/2021		
114		1/12 to 7/12 Ayr Road				881 m²	14 dwellings
	139	1/12 Ayr Road PAKURANGA 2010	964087	Freehold	18/07/2021		
	140	2/12 Ayr Road PAKURANGA 2010	964088	Freehold	18/07/2021		
	141	3/12 Ayr Road PAKURANGA 2010	964089	Freehold	18/07/2021		
	142	4/12 Ayr Road PAKURANGA 2010	964090	Freehold	18/07/2021		
	143	5/12 Ayr Road PAKURANGA 2010	964091	Freehold	18/07/2021		
	144	6/12 Ayr Road PAKURANGA 2010	964092	Freehold	18/07/2021		
	145	7/12 Ayr Road PAKURANGA 2010	964093	Freehold	18/07/2021		
115		1/10 to 8/10 Ayr Road				882 m²	14 dwellings
	146	1/10 Ayr Road PAKURANGA 2010	1001496	Freehold	14/10/2021		
	147	2/10 Ayr Road PAKURANGA 2010	1001497	Freehold	14/10/2021		
	148	3/10 Ayr Road PAKURANGA 2010	1001498	Freehold	14/10/2021		
	149	4/10 Ayr Road PAKURANGA 2010	1001499	Freehold	14/10/2021		
	150	5/10 Ayr Road PAKURANGA 2010	1001500	Freehold	14/10/2021		
	151	6/10 Ayr Road PAKURANGA 2010	1001501	Freehold	14/10/2021		
	152	7/10 Ayr Road PAKURANGA 2010	1001502	Freehold	14/10/2021		
	153	8/10 Ayr Road PAKURANGA 2010	1001503	Freehold	14/10/2021		

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

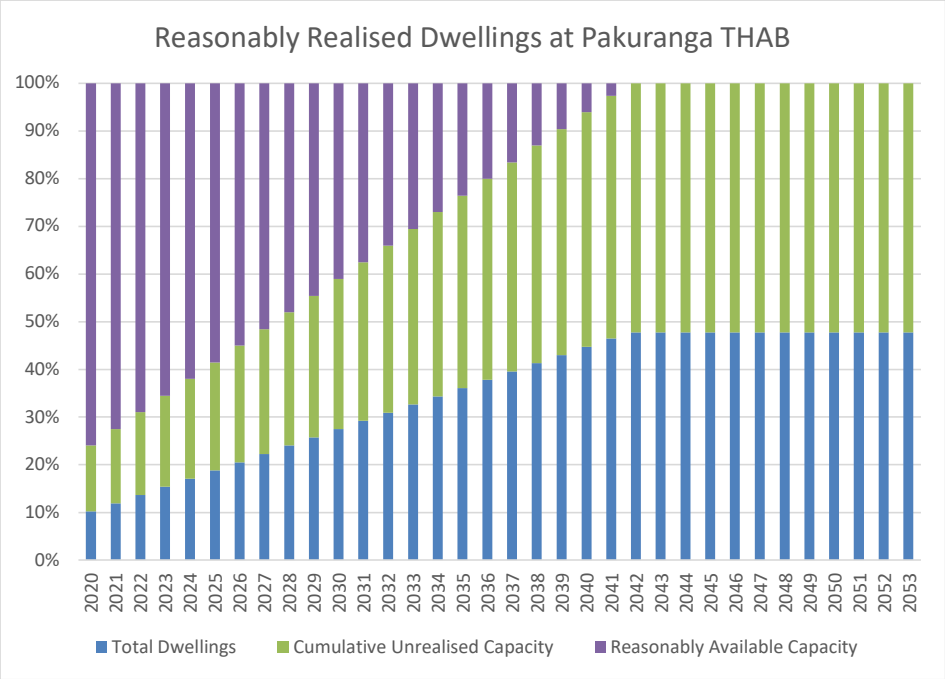
* Maximum Capacity Calculation: Site area times 50% building coverage times 4 storeys, all divided by 120 m² area per dwelling, rounded down to nearest whole number

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

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

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

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



Future Development Plan 2023 #8543

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?

#8543

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the National Policy Statement on Urban Development 2020

AND

IN THE MATTER of a submission to the **AUCKLAND COUNCIL** by **PRE-CON (PTY) LIMITED** in respect of the **CONSULTATION DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023-2053**

SUBMISSION BY PRE-CON (PTY) LIMITED ON THE CONSULTATION DRAFT OF THE AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023-2053

DATED 31 JULY 2023

To: Auckland Council
Attention: Future Development Strategy
Private Bag 92300
Victoria Street West
AUCKLAND 1142

1. INTRODUCTION

1.1 This submission is made by Pre-Con (PTY) Limited ("PCL"). The submission relates to the consultation draft of the Auckland Future Development Strategy 2023-2053 ("draft Strategy").

1.2 PCL's submission relates to the implications of the draft Strategy for the property it has interests in at 116 Ranfurly Road, Alfriston ("site"). PCL is not a trade competitor for the purposes of the draft Strategy and could not gain an advantage in trade competition through this submission.

2. CONTEXT

2.1 The site is owned by PCL, who undertakes specialty development work within Auckland.

2.2 The site is:

(a) Zoned Future Urban ("FUZ") under the partly operative Auckland Unitary Plan ("AUP");

(b) On the north-eastern boundary of the Takaanini FUZ area, as shown in the AUP maps and Figure 43 of the draft Strategy;

(c) Bounded by two key access routes (Ranfurly and Mill Roads), with easy access to State Highway 1;

(d) Approximately 500m from Alfriston School, 4.5km from the Manukau Town Centre and 11km from Auckland Airport; and

(e) Directly opposite the "Alfriston Village" project that is currently being progressed by Windermere Holdings Limited and Kāinga Ora.

3. **ASPECTS OF THE DRAFT STRATEGY TO WHICH PCL'S SUBMISSION RELATES**

3.1 PCL's submission relates to the draft Strategy as a whole, but in particular the:

(a) Proposal to constrain Auckland's future growth to existing urban areas (and consequential preclusion of pursuing greenfield development, including in some existing FUZ areas);

(b) Indicative proposal to rezone the site (and wider Takaanini FUZ area) from FUZ to rural; and

(c) Need to ensure that submitters on the draft Strategy get an appropriate, and adequate, opportunity to be heard, consistent with the requirements of the special consultative procedure (in accordance with the Local Government Act 2002 ("LGA02")) which applies to preparation of the draft Strategy.

4. **REASONS FOR PCL'S SUBMISSION**

4.1 Overall, PCL is opposed to the draft Strategy, and in particular those aspects of it as outlined in paragraph 3.1 above, for the following reasons:

(a) As currently drafted, the draft Strategy will not:

(i) Be consistent with all relevant legislation or appropriately give effect to applicable higher order policy instruments, including the Resource Management Act 1991 ("RMA") and National Policy Statement on Urban Development 2020 ("NPSUD"), and in particular (without limiting the generality of the foregoing), the draft Strategy will not:

1. Result in a well-functioning urban environment that enables all people and communities to provide for their social, economic and cultural well-being and for their health and safety, now and into the future; or

2. Provide for a variety of housing types and sizes that respond to housing need and demand.

(ii) Promote the sustainable management of natural and physical resources or be consistent with Part 2 of the RMA, to the extent that it would not:

1. Enable the social, economic and cultural well-being of the community in Takaanini; or

2. Meet the reasonably foreseeable needs of future generations.

(iii) Enable quality planning outcomes to be achieved for Takaanini.

(iv) Enable the efficient use and development of land in Takaanini, which itself is a physical resource which must be sustainably managed.

(b) There is no reason (based on natural hazards or otherwise) to justify removing the current FUZ zoning from Takaanini in general, or the site in particular.

4.2 Without limiting the generality of those reasons, we address the detail of PCL's specific objections to the draft Strategy, as follows.

5. CONSTRAINING AUCKLAND'S GROWTH TO EXISTING URBAN AREAS

5.1 Part 2 of the draft Strategy states that to achieve the Strategy's goals, there needs to be adherence with a guiding strategic spatial framework. For Auckland, that framework has already been established via the AUP. In terms of urban growth, the Regional Policy Statement provisions in Chapter B of the AUP require development to occur in a way that results in a "*quality, compact urban form*". To achieve this, the relevant objectives and policies from Chapter B2 of the AUP require growth and intensification to be "*promoted*" within the existing urban area (as it was in 2016), and "*enabled*" within the Rural Urban Boundary.

5.2 One of the principles (and challenges) of adopting a "quality, compact" approach to growth and change is to enable sufficient capacity for growth in the right place at the right time. To guide how that should occur, the Council has previously introduced documents such as the Future Urban Land Supply Strategy 2017 and 2018 Development Strategy. The latter introduced four "nodes" (the city centre, Albany, Westgate and Manukau) as places expected to undergo a significant amount of housing and business growth over the next 30 years.

5.3 The draft Strategy provides an opportunity to reinforce and refine the process started under the AUP. Yet the Council is using current financial constraints as a reason to significantly change course and not only freeze, but reduce opportunities for growth. In particular, the draft Strategy proposes that:

(a) Virtually all growth over the next 30 years be accommodated within existing urban areas; and

(b) As a result, there be not only no new FUZ areas identified, but that a number of existing FUZ areas (including Takaanini) be removed.

5.4 PCL's position is that:

(a) By focusing on growth in existing urban areas, the draft Strategy is making broad assumptions about the next 30 years based on an already outdated Housing and Building Capacity Assessment, its own "manufactured" financial constraints and preference for ad-hoc "infill" development.

(b) Such an approach will not result in quality urban outcomes or ensure infrastructure is provided in a comprehensive, long-term and cost-effective manner. Rather, it will:

(i) Continue the current mistake of constantly implementing numerous piecemeal infrastructure solutions, which are nothing more than band-aids; and

(ii) Be inconsistent with the NPSUD, Policy 2 of which requires local authorities at all times to provide sufficient development capacity to meet expected demand for housing and business land over the short, medium and long term.

(c) Instead, the draft Strategy should recognise:

(i) The significant role that FUZ areas make in terms of their ability to deliver affordable urban development and create a variety of housing and living environments as well as integrated employment areas; and

(ii) That it is not realistic for the growth demand to be met and infrastructure issues to be resolved if greenfield development is constrained, at least to the extent currently proposed in the draft Strategy.

(d) The draft Strategy accordingly needs to provide a pathway for growth outside the current urban form, where it can deliver better-functioning communities (rural and urban), ecosystems and more resilient interconnecting infrastructure networks.

6. AVOIDING GROWTH IN AREAS EXPOSED TO SIGNIFICANT RISK OF ENVIRONMENTAL HAZARDS

6.1 Section 4.2.6 of the draft Strategy proposes to remove at least four existing FUZ areas from being available for urban development due to natural hazard risks. As noted, one of those is the Takaanini FUZ area, in which the site is located.

6.2 Appendix 7 (page 30) of the draft Strategy provides the only reasons that the Council has given for proposing this removal. In respect of Takaanini, it states that:

> "*The whole of the Takaanini is recommended for removal due to:*
>
> - *Significant flood plain extent within the FUA, particularly a large area north of the Papakura Stream and the entire area south of the stream, with more than 50% of the FUA exposed to the 1% AEP flood plain. Development also poses risks of exacerbating downstream flooding effects within the existing urban area. Appropriate mitigation will be costly and require council-led integrated catchment management planning / intervention.*
>
> - *The FUA has a significant proportion of alluvium / colluvium geological formations, typically overlain by peat / peaty loam in the south. This poses settlement risks (and potential dewatering) for development and infrastructure, resulting in ongoing hazard risks and / or likely incurring significant costs to appropriately mitigate. As a result of this geology a significant portion of the FUA is also in an area where liquefaction damage is possible.*"

6.3 The Council has not provided any detailed analysis of the flooding or geotechnical risks that apply to the site, to justify this position. Nor has the Council explained how these risks have changed (for the worse) since the site was considered appropriate to be zoned FUZ, following consideration of such matters.

6.4 The key summary regarding natural hazard matters provided in the draft Strategy is Figure 19, which purports to show "*locations which are highly constrained by hazards with the highest population density and deprivation*". But even on this analysis, it would appear that the site has a scoring of "1", indicating it is a location "*with lowest combined area constrained by hazards, population density and deprivation score*". This directly contradicts the Council's position that the Takaanini FUZ area (and site in particular) is no longer suitable for residential use, due to natural hazards risks.

6.5 Further, as can be seen from **Figure 1** below, there is only one small section along the site's southern boundary that is shown in the Council's GeoMaps database as being flood prone. While the site contains overland flow paths, these are not in any way unusual or more extensive than those that exist on virtually all sites across Auckland (or those within other FUZ area).

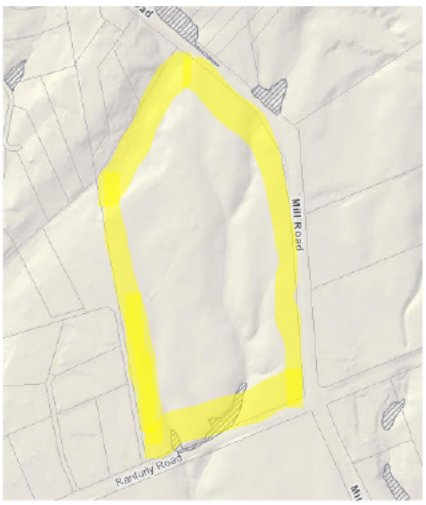


Figure 1: The site (outlined in yellow highlight), with "flood prone areas" shown in hatching (Source: Council's GeoMaps database)

6.6 As such:

(a) The Council has provided little, if any data to support its position that the Takaanini FUZ area (or site) is subject to natural hazards (particularly flooding and geotechnical) which render it no longer suitable for residential development.

(b) Such data as the Council has provided with the draft Strategy actually confirms that the site is not subject to any undue (or unusual) flooding or geotechnical risk. Certainly, it is not subject to any greater risk than many thousands of other sites around Auckland which are (and are proposed to remain) as suitable for urban development.

7. SPECIAL CONSULTATIVE PROCEDURE REQUIRES REASONABLE OPPORTUNITY TO BE HEARD

7.1 Clause 3.15 of the NPSUD requires local authorities to use the special consultative procedure in section 83 of the LGA02 when preparing or updating a Future Development Strategy. In accordance with section 83(1)(d) and (e) of the LGA02, a local authority must ensure that any person who wishes to present their views to the local authority or its representatives is given a reasonable opportunity to do so and is informed about how and when they may take up that opportunity.

7.2 At this stage, it is unclear whether the Council intends to hear from submitters on the draft Strategy and if so, how. PCL's position is that the Council must provide an opportunity for submitters to be heard and given the nature and significance of the draft Strategy, this opportunity must be by way of a dedicated hearing before Councillors. It would not be sufficient, nor comply with the requirements of the LGA02, for the Council to either:

(a) Not provide any opportunity for submitters to be heard; or

(b) Only allow certain submitters to present at a normal Governing Body meeting, within allocated time limits.

8. RELIEF SOUGHT

8.1 For the foregoing reasons, PCL seeks the following outcome in relation to the draft Strategy:

(a) The draft Strategy:

(i) Reinforce and support the significant role intended for FUZ areas under the AUP in ensuring a "*compact, quality urban form*", rather than seeking to take the complete opposite (and unjustified) approach as currently proposed in the draft Strategy; and

(ii) Provide a pathway for growth outside the current urban area, where it can be established that such growth will support Auckland to be a well-functioning urban environment.

(b) The Takaanini FUZ area (and the site in particular) be retained, rather than re-zoned by way of a plan change, as is currently proposed under the draft Strategy.

(c) The Council hold a specific hearing process for submissions on the draft Strategy (not just invite submitters to speak at an upcoming Council meeting), given the importance of the issues being addressed by way of the draft Strategy.

8.2 PCL wishes to be heard in support of this submission.

8.3 If others make a similar submission, PCL will consider presenting a joint case with them at hearing.

DATED at **AUCKLAND** this 31st day of July 2023

[redacted] _____

[redacted]

Counsel for Pre-Con (PTY) Limited

Address for service of the submitter:

[redacted]

The Environmental Lawyers
Level 4, The B:Hive
72 Taharoto Road
Takapuna

[redacted]

Future Development Plan 2023 #8548

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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

While it is agreed that some focus should be given to intensification within existing zoned urban areas it is also important that business land still be provided in greenfield areas to support the land that has already been zoned for residential development and currently being developed. This is particularly the case in Pukekohe which is one of two identified "satelite" towns identified in the Auckland Plan. As a satelite town, Pukekohe is expected to provide sufficient land to provide local employment to support its growing population and reduce commuter distances. There is insufficient Business zoned land in Pukekohe and the FDS should enable more Future Urban land for employment.

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 FDS needs to provide for the release of more land currently zoned Future Urban Zone (FUZ) to support local employment opportunities and reduced comuting trips to metropolitan Auckland. More FUZ land in Pukekohe needs to be rezoned now to provide for the employment needs associated with residential zoning and development currently underway.

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
Land subject to natural hazards (i.e. flooding) should be avoided for residential development However, land subject to limited flooding risk may be suitable and resilient for business development.

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 approach is supported and can be provided as part of a comprehensive business zoning and development in greenfield areas. Plan changes are able to to provide provisions (via precincts) to

require the provision of necessary resilient and nature-based infrastructure funded by developers at key trigger points of development.

Other feedback

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

The NPS-UD, the RPS and Auckland Plan require that sufficient land be zoned to provide for the business development needs of the Auckland Region. Pukekohe currently has a shortfall in land zoned for business and employment activities, especially land for Large Format Retail and larger light industry activities. The FDS needs to enable more business land to be rezoned now to meet this demand.

While there may be sufficient business land across the Auckland Region as a whole, this is not the case for Pukekohe.

#8548

Help us shape Auckland's future growth

Feedback must be received by **Monday 31 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: Pukekohe Local Board

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

☒ Yes ☐ No Name of organisation/business: On behalf of: Peterex Properties Limited Pukekohe Limited

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?

☒ Male ☐ Female ☐ Another gender (please specify): _____

What age group do you belong to?

☐ Under 15 ☐ 15-17 ☐ 18-24 ☐ 25-34 ☐ 35-44
☒ 45-54 ☐ 55-64 ☐ 65-74 ☐ 75+

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

☒ 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)

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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

While it is agreed that some focus should be given to intensification within existing zoned urban areas it is also important that business land still be provided in greenfield areas to support the land that has already been zoned for residential development and currently being developed. This is particularly the case in Pukekohe which is one of two identified "satelite" towns identified in the Auckland Plan. As a satelite town, Pukekohe is expected to provide sufficient land to provide local employment to support its growing population and reduce commuter distances. There is insufficient Business zoned land in Pukekohe and the FDS should enable more Future Urban land for employment.

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

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

Tell us why

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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?

- [x] Agree
- [ ] Disagree
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Tell us why

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

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

Tell us why

This approach is supported and can be provided as part of a comprehensive business zoning and development in greenfield areas. Plan changes are able to to provide provisions (via precincts) to require the provision of necessary resilient and nature-based infrastructure funded by developers at key trigger points of development.

Other feedback

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Need more room? You can attach extra pages.

Future Development Plan 2023 #8550

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Your feedback

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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?

Please refer to the attachment

NGĀI TAI WHENUA LIMITED, NTW

OPPOSING SUBMISSION TO AUCKLAND COUNCIL, PLANNING AND ENVIRONMENT COMMITTEE

DRAFT FUTURE DEVELOPMENT STRATEGY, FDS 2023 – 2053

Prepared by: James Brown

Title: Managing Director, Ngāi Tai Whenua Limited

Date: 31 July 2023

SUBMITTER INTRODUCTION

Ngāi Tai Ki Tāmaki (NTKT) are the original inhabitants of Tāmaki Makaurau, Auckland and its treaty settlement legislation was passed exclusively for NTKT in 2018. NTKT also maintains shared interests in the collective settlements of; (13 iwi) via the Ngā Mana Whenua o Tāmaki Makaurau Collective 2014, (63 hapū) Waikato – Tainui Raupatu Settlement 1995 and is awaiting the enactment of the (12 iwi) Hauraki Collective Iwi Settlement likely in 2024 – 2025.

The NTKT post settlement governance entity or PSGE has established a Commercial Investment Trust (CIT) which is primarily responsible for establishing and advancing the commercial interests of NTKT.

Similarly, the PSGE has established a Community Development Trust or CDT which has the responsibility of realising the iwi aspirations for social, cultural, environmental outcomes including health, education, housing and kaumātua priorities.

Ngāi Tai Whenua Limited (NTW) is a CIT commercial and residential property company and has property investments and developments scattered across the Auckland region including significant housing projects. One development project that causes NTW concern is a current private plan change, PC88 of which NTW are a co-applicant and partner.

This plan change proposes to rezone and develop a 307-hectare site in the Beachlands South precinct and this plan change was accepted by the Auckland Council (AC) Planning and Environment Committee (PE)C in December 2022 though formally lodged in March 2022.

It is with some dismay NTW is having to allocate significant resource and cost in preparing this submission, particularly when this AC initiative propose to compromise the current investment decision making and associated costs of NTW, within rural green and brownfield locations.

Notwithstanding the myriad of considerations, this NTW submission serves to ensure the principles of Rangatiratanga, te Tiriti o Waitangi and kaitiakitanga are properly considered and applied accordingly thereafter.

NTW focusses this submission on a key te Tiriti o Waitangi principle of central and local government responsibilities when they make decisions that affect Mana Whenua, and that te Tiriti principles such as the ‘right for Mana Whenua to develop’ are accordingly considered and applied within the FDS. There is no evidence that principles of te Tiriti o Waitangi are included in the current FDS albeit there is vast commentary in relation to Mana Whenua. It appears the volume of Mana Whenua commentary is generic and likely taken from a number of other AC initiatives.

1.0 SUBMISSION DISCLOSURE

1.1 NTW were not engaged or consulted regarding the draft FDS.

1.2 NTW submission serves to strengthen the formal submission of Russel Property Group, RPG which NTW have read and in doing so formally endorses the entirety of the RPG submission.

1.3 NTW is also part of the 'Waiohua-Tāmaki rōpū' collective iwi submission, to oppose the Draft FDS in its current form in specific regard to the Te Auaunga Precinct and the Carrington Road area.

1.4 NTW is also part of the Windermere Holdings submission in specific regard to the Mill Road. Alfriston area who are also opposing FDS.

1.0 SUMMARY OF SUBMISSION

2.1 The FDS is an attempt of AC officials to actively evade and avoid the current legal and statutory document bank and associated policies and practises that NTW subscribed when developed by AC.

2.1a Auckland Plan; and

2.1b Unitary Plan; and

2.1c National Policy Statement – Urban Design, NPS-UD; and

2.1d Future Urban Land Supply Strategy, FULSS; and

2.1e Ngāi Tai ki Tāmaki Te Tiriti o Waitangi Settlement Act, 2018; and

2.1f Ngāi Tai ki Tāmaki, Take Taiaomaurikura, 2022; and

2.1g Ngāi Tai ki Tāmaki and Auckland Council Relationship – Signed Legacy Agreement, 2010 (not updated); and

2.1h Plan Change 88, PC88, to rezone and develop 307 hectares of land for a future significant housing, retail, commercial office, hotel and school development.

2.2 NTW have made significant investment decisions relying on the existing

statutory plans, policies, and practises including AC balanced strategy of 2011. NTW remain committed to the 2011 strategy.

2.3 One such investment decision is PC88 with partners Russel Property Group and others.

2.4 FDS relies on limited urban locations and sites to manage the immediate and intermediate needs of future development yet has not yet completed the HBA process as described in the NPS – UD.

2.5 The current draft in respect to materialising the rural future development potential seems to be either suspended or dismissed or both. AC posture in this instance in unacceptable and intolerable and is not a feature of local government and Mana Whenua relationships or partnerships.

2.6 NTKT Marae and offices are located in rural locations as are a number of cultural redress sites returned by the Crown that NTKT may want to develop in the future including Clevedon, Beachlands and Whitford. The current FDS draft would compromise these aspirations of NTKT and NTW.

2.7 The FDS statement regarding rural lands either suspended or removed for development is a systemic process AC officials have engaged and rely upon including avoiding and evading NTW and NTKT, however, NTW believe this strategy will be at AC, PEC and FDS peril.

2.8 If AC and PEC adopt or endorse the FDS draft this will leave little room for mitigating and resolving difference which therefore leaves litigation as the only judicial tool and instrument for NTW to consider later.

2.9 For the above and other reasons, NTW are formally opposed to the FDS.

2.10 NTW request a meeting with the PEC chair, the Mayor and Deputy Mayor of AC and elected Councillors to Franklin, Papakura, Howick and Manukau wards.

3.0 FDS Process

3.1 The current FDS is neither transparent or accountable and includes emails to unauthorised recipients of NTKT, 17 October 2022. These emails were not received or responded to.

3.2 At the May 2023 meeting of PEC the committee supported accepting the FDS and included the support of the two (2) Independent Māori Statutory Board, IMSB members.

3.3 Once NTW were informed of this decision, NTW met with the 2 IMSB members about the process and outcome of this committee decision.

3..4 NTW alleged AC officials mislead or misinformed PEC in relation to the process particularly that of engaging Mana Whenua in FDS.

3.5 Note the 2 IMSB members supported the FDS in May however once they met with NTW then realised their core role is to support Māori, mana whenua they expressed genuine remorse as the original vote by the PEC in May was won by two (2) votes.

3.6 NTW understand the IMSB members approached the chair of PEC in June to consider their votes from May be changed to against however this was refuted by the chair and later PEC itself when ratifying the May Minutes of PEC meeting approving FDS.

3.7 At the PEC July meeting, BSLP prepared a succinct presentation for the committee however approximately half of the Councillors were not present whether digitally or physically.

3.8 It is therefore the opinion of NTW the process that FDS has embarked upon is illegal.

3.9 Evidence from OIA request confirms AC and PEC requirement to discover

and complete the Housing and Business Development Capacity Assessment (**HBA**) is incomplete.

3.10 In regard to the process FDS has executed thus far, NTW reiterates its opposing submission on the basis the contact and engagement has not occurred with NTW or NTKT.

4.0 Rangatiratanga

4.1 Noting the lack of engagement and exchange with NTW or NTKT generally, this submission expresses concern in relation to the absence of Rangatiratanga or the absence of leadership between AC and NTKT.

4.2 It appears that Māori and Mana Whenua is opposed to rural development, however, this requires intensive and proper scrutiny as this is certainly not the position of NTW or NTKT.

4.3 By default of AC lack of engagement, there is no alignment to any NTKT or NTW planning and development documents neither is there are any alignment with the NTKT Treaty of Waitangi Settlement Act however what is alarming is there is no alignment to the current AC and NTKT signed legacy relationship agreement, 2010. NTW note that this agreement has not been updated since 2010 and are aware at least 3 or 4 other iwi have had their agreements updated.

4.4 The AC agreement is the outcome of a Judicial Review NTKT took against the then Manukau City Council (MCC) as a result of MCC approving a development on a NTKT wāhi tapu Pā site with no contact or engagement. The JR was successful in that the Courts ordered the Mayor at that time, Sir Barry Curtis to publicly apologise to NTKT and to provide capacity for NTKT to engage RMA applications of interest to NTKT and this included daily faxes of RMA applications to the city NTKT to consider engaging. This agreement (2000) was then dedicated to all Mana Whenua of MCC including Ngāti Paoa, Ngāti te Ata,

Ngāti Tamaoho, Te Akitai and NTKT. When AC took over in 2010, the Mayor, Len Brown who was also the last sitting Mayor for MCC requested NTKT and himself transfer the Court ordered RMA contract into a capacity contract known as a legacy agreement from MCC. Once this was completed, the Mayor offered the same agreement to the other eighteen (18) iwi making the agreement include all 19 iwi, AC recognise. Whilst NTKT and NTW see the common sense in this approach NTKT opposed the roll out to other Mana Whenua because none suffered the duress NTKT did when it observes a significant Pā site being desecrated to accommodate an immigrants palace development.

4.5 Since the AC agreement in 2010, NTKT Rangatira have successfully completed;

4.5a Historical grievances and claims against the Crown including;

4.5aa Ngā Mana Whenua o Tāmaki Makaurau, 2014; and

4.5ab Ngāi Tai ki Tāmaki Settlement Act, 2018; and soon

4.5ac Hauraki Collective Iwi Settlement, 2024 – 2025.

4.5b Establishment of PSGE and subsidiaries that serve to advance the commercial and community needs of NTKT iwi members in 2017.

4.5c Successful prosecution in Supreme Court versus Minister DoC, Section 4, Conservation Act, 1987 when decision makers are making concession decisions that they 'give effect' to the principles of te Tiriti o Waitangi.

4.5d Established presence, investment and commercial operations in agriculture, aquaculture, horticulture, housing, hospitality, tourism, events, research and development across the Auckland region including the Hauraki gulf and iconic pest free islands.

4.5e Investment to develop over 100 fluent speaking Ngāi Tai ki Tāmaki iwi members to be available to welcome, host and accommodate the multitude of visitors to Umupuia Marae and other iwi kaupapa or events.

4.6 NTKT Rangatira also oppose FDS and demand a meeting with the Mayor, Deputy Mayor and Councillors to have the AC agreement updated so as to enable AC officials to apply the intentions of such an agreement immediately thereafter.

5 Te Tiriti o Waitangi Principles.

5.1 Local government decision makers must 'have regard' for the principles of te Tiriti o Waitangi when making decisions that affect Māori, mana whenua and tangata whenua and is generally described in RMA 1991, LGA 2002 and their respective amendments.

5.2 Whilst some principles in past legal and statutory cases have been labelled ambiguous, the principle of 'active protection' is not and decision makers whether local or central government must demonstrate or evidence how they effectively 'gave effect' to the principle of active protection.

5.3 NTKT Rangatira proved the active protection responsibility in the Supreme Court decision of December 2018 versus Minister of Conservation case, Section 4 in particular, 'shall give effect' to the principles of te Tiriti when making commercial concession decisions within the DoC estate.

5.4 NTW has secured sites for development with reputable partners within rural and greenfield locations and demands the active protection of AC and PEC when making their respective decisions related to FDS.

5.5 NTW notes FDS had met with Kāinga Ora and the NZ Property Council as the primary engagement of developers however neither knows or represents the iwi or development interests or investments of NTKT or NTW.

5.6 It is worth noting that within the NTKT Settlement Act is the Partnership Agreement and the proposed Hunuā Ranges Plan between Council and NTKT and each time NTKT seek to reconcile this legal requirement NTKT are told, the Council resources are limited and will contact and engage NTKT in due course to complete the legislative task as described in the Ngāi Tai ki Tāmaki Settlement Act, 2018.

5.7 Whilst NTKT are told the Council has limited resources, we now observe Council investing such limited resources into FDS yet is doing so without the proper or extensive planning criteria being completed.

5.5 The process of FDS and the general attitude and application of AC officials in relation to NTKT Rangatiratanga or lack thereof is systemic as generalised above with the status of both the relationship agreement and legislative task related to Hunua Ranges remaining incomplete.

5.6 It is therefore the opinion that AC PEC do not understand or respect the fact that AC has a legal and statutory responsibility to not only protect the rights of Mana Whenua but actively protect such rights and these include the right to commercially develop.

5.7 Notwithstanding the volume of Māori and Mana Whenua commentary in the FDS, none refer to the presence or purpose of the principles of te Tiriti most of which are the primary and paramount legal and statutory tuākana or elder legislative and statutory tool and instrument for Māori and Mana Whenua to rely upon.

5.8 Given the absence of the principles of te Tiriti, this element also fails to satisfy any NTKT planning requirement therefore renders FDS as a flawed and failed attempt of AC, PEC to properly engage and inform NTW.

5.9 What is clear however is that over the past 180 years, pākehā once they settled have been the primary architect and developer of their own view

of future proofing Auckland however there are no signs or models that evidence pākehā actually know what they are doing. The current status including lack of housing, congestion, pollution, poverty of our city suggests otherwise.

6 Kaitiakitanga and Private Plan Change 88, PC88

6.1 In specific relation to PC88, this project and development this is a site that was and remains intensively modified for both historical farming and recent 1990's golf course and resort development known as Formossa and the neighbouring site known as Ahuareka.

6.2 It must also be noted that even before the Auckland and Unitary Plan were considered this site was allocated for development as early as the 1980'S when Sir Barry Curtis, Mayor of Manukau and his Council at that time dedicated the site as a Coastal Development Node from where the subsequent developments to this area in recent times (2000 – 2022) have and remain founded upon including but not restricted to Spinnaker Bay, Pine Harbour, Beachlands and Maraetai generally.

6.3 This site and development will enable a number of NTKT iwi desires and aspirations to materialise namely housing for iwi and all others as well as retail and commercial office locations and a proposed new school which is long overdue for this site and surrounding area.

6.4 It is of some irony that when Council approved the original development of Formosa they did so without ensuring NTKT were contacted and engaged on the development of which NTKT confirm, were not at all contacted or engaged when Council approved this development.

6.5 NTW has furnished a comprehensive Cultural Values Assessment, CVA of the site in 2020 – 2021 and is appended to PC88 document bank.

6.6 The CVA notes whilst there are no recorded or known wāhi tapu or archaeological sites to the proposed development area, there are some culturally sensitive areas namely the coastal foreshore environment where locally in other areas midden and at time kōiwi or human remains are discovered.

6.7 The Council has also made strong statements about supporting and enabling Mana Whenua wellbeing opportunities. This conflicts with the actual predetermined spatial strategy of favouring existing urban zones purely because they are existing urban zones.

6.8 Some iwi authorities happen to have extensive existing urban areas within their rohe, but others do not and will be discriminated against by the Draft FDS. It is disingenuous to make such general all-of-iwi statements when the preferred Council strategy is so inequitable as between iwi and to Ngāi Tai.

6.9 Ngāi Tai does not consider that the Draft FDS provides equal opportunity for iwi within the Auckland region to enhance their mana, enable self-determination to be expressed, or to exercise kaitiakitanga. Ngāi Tai is therefore gravely concerned that the this does not satisfy Council's statutory obligation to provide appropriate opportunities for iwi to realise outcomes that are important to them.

6.10 PC88 anticipates such risk by accommodating any or all mitigating requirements should wahi tapu be discovered during earthworks, the AC Accidental Discovery Protocols will apply as an example.

6.11 The CVA is omitted to improving and advancing water quality which BSLP has already begun investing namely minimising the untreated stormwater run-off from the coastal environ as the previous owner to the site already had AC Abatement notices applied to the site for this reason however once BSLP acquired the site, this matter was mitigated immediately much to the delight of the local community.

6.12 The CVA also touches on some social objectives and outcomes namely the ongoing risk of the growing volume of high school students who bus to their schools from this location and where most buses are overcrowded with multiple students actually standing in bus aisle so as to ensure their on the bus however an accident involving a bus full of students is the single largest reason NTKT and NTW have made this significant investment decision and commitment to the site, development and partnership.

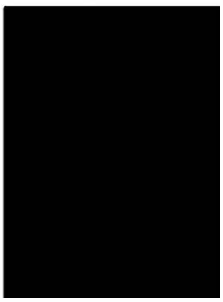
6.13 NTKT and NTW do not want to spectate at this potential of any student being injured or killed in a school bus accident and would rather intervene and provide an immediate solution all of which the local community support.

6.14 NTW convey herein the real potential of a school bus accident or the social presence and responsibilities some projects must take into account including BSLP and PC88.

7 Conclusion

NTW are formally opposed to the current draft FDS and demands an allocated spot at PEC to speak to this submission.

Signed



James Browm, Managing Director,
Ngāi Tai Whenua Limited

Future Development Plan 2023 #8554

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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?

Please refer to the attachment

FEEDBACK ON AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY

Woolworths New Zealand Limited

Woolworths New Zealand Limited ('**Woolworths**') provides this detailed feedback on Auckland Council's draft Future Development Strategy ('**FDS**').

Introduction

Woolworths is one of New Zealand's leading supermarket brands. It has been part of New Zealand communities for more than 90 years, through its Countdown, SuperValue and FreshChoice supermarkets, and the Foodtown, Woolworths and Big Fresh stores before that. Woolworths' team of more than 22,000 people work hard to deliver safe, fresh, and affordable groceries to New Zealanders through its 196 Countdown stores and portfolio of over 70 franchised stores operating under the Super Value and FreshChoice brands. Many of Woolworths' supermarkets are in the Auckland region.

Woolworths also continue to increase its commitment to, and investment in, community, charity and sustainability initiatives, including its 2025 Sustainability Plan Kia pai ake te āpōpō - A Better Tomorrow. More recently, Woolworths has launched a package to help growers recover from Cyclone Gabrielle and as part of its sustainability work in 2022 donated $7.4 million of food and funds to those in need, removed 58.3 tonnes of saturated fat, sugar, and salt from its Own Brand products, and diverted 73 percent of waste from landfill.

Woolworths is continually identifying areas and communities that have a need for, and would benefit from, additional supermarket services. Woolworths purchased 45 Brigham Creek Road, Whenuapai, in response to demand caused by the significant growth experienced in and forecast for this area. Woolworths is also working to address gaps in its network or to upgrade existing operations, and to respond to changes in customer shopping requirements.

As has been clear during the Covid-19 pandemic, supermarkets are essential services, as well as being economic drivers and catalysts for well-functioning urban environments. Functional need and catchment drivers often dictate the location of supermarket operations on the fringe or, in some cases, outside of identified centres. Cost of living is also a concern to Woolworths' customers in Auckland. The wider policy behind the recent Commerce (Grocery Sector Covenants) Amendment Act

is to reduce developmental constraints on competition so that consumers can benefit. Given their important role, the establishment or redevelopment of supermarkets needs to be provided for.

Woolworths supports intensification of existing urban land, as proposed in the FDS, but considers that there is a need for both urban intensification and planned expansion on greenfield land if Auckland is to achieve the requirements of the National Policy Statement on Urban Development 2020 ('**NPSUD**'), the objectives of the Regional Policy Statement, and the outcomes sought in the Auckland Plan 2050.

Executive Summary

In summary, this feedback makes the following key points:

- Intensification of the existing urban area is supported, but some growth in greenfield areas should also be enabled.
- The proposed extent of growth policy realignment does not support long-term certainty and consistency, and will undermine market confidence as a result.
- Engagement on the FDS has not been sufficient and implementation of the FDS should be delayed until adequate consultation has been completed.
- Assumptions used in the FDS to determine development capacity are flawed, and cannot be relied upon to accurately quantify the land required to accommodate future growth.
- A current lack of infrastructure funding is not a compelling reason to preclude growth in greenfield FUZ areas, as funding shortfalls can be resolved through a combination of tools that are available now, including development contributions and direct funding by developers.
- Whenuapai should be prioritised for greenfield growth, given the existing investment in infrastructure and the extent of strategic planning that supports the urbanisation of this area.

Feedback

Support in principle for a Future Development Strategy

Woolworths accepts that a FDS is required under the NPSUD, but does not support the Council's proposed draft in its current form and considers that it is based on an inadequate and insufficient evidence base.

Having a blueprint for how Auckland will grow and where and how growth will be managed is an essential guide for the market. It should direct the market to locate housing and business activity in the most appropriate locations from a social, environmental, and economic perspective.

The current Future Urban Land Supply Strategy ('**FULSS**') has worked reasonably well in informing and directing the location of growth, albeit that the Council's implementation of the strategy could have perhaps been more responsive to the pace of that growth.

Before the FULSS is updated in the form of the FDS, Woolworths considers that a comprehensive and robust assessment of business and residential capacity and demand is needed in order to meet the

requirements of the NPSUD. This means assessing business land capacity (which has not been done beyond a preliminary assessment) and realistic residential capacity including likelihood that plan enabled capacity will be taken up. Capacity figures need to include competitiveness margins, and incorporate the findings of the Council's natural hazard and flooding work and the outcomes of Plan Change 78 ('**PC78**').

The need for certainty and consistency

The purpose of a future development strategy is to promote long-term strategic planning by setting out the means by which a local authority intends to achieve a well-functioning urban environment, provide sufficient development capacity over the next 30 years, and integrate planning decisions with infrastructure planning and funding.[1]

Within this long-term strategic planning context, there is a need for consistency and certainty to enable efficient public sector investment in infrastructure and private sector delivery of development projects. In addition, for implementation to be effective, it must be timely. While review of the FDS is required[2] in order to align with three-yearly Long-term Plan cycles, significant change at these times is not appropriate as it will undermine public confidence in a consistent approach to strategic planning.

It needs to be recognised that most of the development of Auckland is undertaken by private developers, including businesses that acquire and develop land for specific purposes (such as Woolworths). Some of these projects take many years to implement, and business confidence will be undermined if companies cannot rely on the consistency and certainty of long-term planning to make investment decisions.

Woolworths has relied heavily on the Auckland Unitary Plan ('**AUP**'), the FULSS, and the Whenuapai Structure Plan to guide its investment decision to purchase the site at 45 Brigham Creek Road in Whenuapai (refer **Figure 1**).

That land was acquired to accommodate a supermarket and a mix of other supporting activities to serve the needs of the Whenuapai community, and was purchased in advance of a sufficient contributing catchment being in place because the planning instruments made it clear that urban development was on its way. Woolworths now sees the prospect of that investment being unnecessarily restrained due to the proposals in the FDS, which seek to defer urbanisation of Whenuapai until at least 2035.

[1] NPSUD, clause 3.13
[2] Ibid, clause 3.16



***Figure 1**: Woolworths' site at 45 Brigham Creek Road, Whenuapai (in red)*

More broadly, the significant changes that the FDS now proposes to growth planning in Auckland will undermine developer confidence in the region as a place to invest. As development primarily occurs as a result of private sector investment, a reduced level of developer confidence in Auckland will inevitably have consequential impacts on the regional economy and on housing affordability.

Fairness

There is an element of fairness to consider in relation to the draft FDS. Woolworths and others have made decisions based on the current FULSS and the broader development strategy contained in the Auckland Plan 2050.

Anyone purchasing land in the Future Urban Zone ('**FUZ**') will have paid for it based at a value that is heavily influenced by the clearly signalled development potential. The only discount applied, relative to 'live-zoned' urban land, is as a result of timing. An investment of this nature, where the future development potential is now being removed or substantially delayed, could result in adverse financial consequences for the owner. Woolworths considers that guiding strategy documents relating to urban growth should not be altered in any significant way, particularly where that involves removal of development potential or delaying the timing of land release. If it is agreed that a change in course is desirable, then that should be a long-term realignment that is applied to new development areas that might be considered beyond the current 30-year timeframe under the FULSS and the Auckland Plan 2050.

Lack of engagement

Woolworths is one of Auckland's largest employers, and owns or leases significant landholdings within the region. It also relies on the Council's strategic growth planning for its own projections of demand

for supermarkets, which are essential services for Auckland's communities. Woolworths was not directly consulted in any way on the FDS. Moreover, Woolworths' opportunity to actively engage was curtailed because the single 'Have Your Say' event was held before the close of the feedback period and attendance was by invitation only.

The NPSUD expressly requires the Council to engage with the development sector to identify significant future development opportunities and infrastructure requirements (clause 3.15(f)). However, to date (and as acknowledged in the draft FDS's evidence report), Council has only consulted with the development sector in a very limited way. This approach means that the FDS does not appropriately recognise current and future development projects in the pipeline and their associated land requirements.

Woolworths considers that Council's approach to consultation and engagement for the FDS has been insufficient, particularly given the crucial importance of the FDS to Auckland's growth and economic prosperity.

Flawed growth assumptions

The FDS effectively seeks to restrict growth to the existing urban area, with no significant growth identified in greenfield locations until at least 2035. However, that approach assumes that more than sufficient capacity for housing and business land is currently available within the existing urban area. In reaching that conclusion, the Council has relied on the potential for additional development capacity to be released under PC78 and has identified this capacity as '*plan enabled*'. Woolworths considers that development capacity that may (or may not) arise from a proposed plan change cannot credibly be assessed as plan enabled. There is significant uncertainty about the final form of PC78 or even whether it will be approved, given political factors and the 12-month deferral to further consider natural hazards following the Auckland flooding events.

Woolworths also notes that the draft FDS has been prepared without the Council having completed its business capacity assessment, which is not due until August. It is unclear how reliable assumptions can be made about business capacity without a robust evidence base being available to inform the FDS.

Infrastructure investment

It is accepted that the Council has financial constraints which are negatively impacting infrastructure provision. However, the solution is not to stop greenfield development and have a narrow focus on urban consolidation until at least 2035. Urbanisation of FUZ greenfield land after 2035 is predicated in the FDS on the establishment of identified infrastructure projects, although the absence of any funding mechanism to implement those projects gives little confidence that development will be able to commence at that time.

It is apparent from review of the FDS that a significant driver of the proposed exclusion of FUZ land from urban development is the Council's inability or unwillingness to fund infrastructure. Woolworths considers that alternative funding solutions are available and should be utilised, such as developer

funding and the use of the tools provided by the Infrastructure Financing and Funding Act 2020. It appears that Council has assumed that it is the only organisation that can fund infrastructure, whereas there are several other mechanisms available to enable infrastructure funding and delivery.

Where infrastructure investment has occurred to date, Woolworths considers that those areas should be prioritised so that a return can be obtained from the funding that has been invested. In the case of the Woolworths land in Whenuapai, the Council and its CCOs have invested a combined $181m for the Northern Interceptor bulk wastewater line and North Harbour 2 watermain, both of which are required to service the Whenuapai area. In addition, the Council has purchased land for parks and open space in Whenuapai at a cost of $34m (161 Brigham Creek Road, 4 Spedding Road, and 92 and 94A Trig Road).

If there is no further urban development in Whenuapai before 2035 at the earliest, and 2050 for some of the Whenuapai land, that investment of $215m of Council infrastructure funding will have been wasted. That outcome would be inconsistent with the efficient use of public money and will result in cost without benefit.

Planning in Whenuapai

Whenuapai has a long history of integrated planning for urban growth. Woolworths considers that development of land in Whenuapai should be enabled immediately, as signalled in the FULSS and other strategic planning documents.

The development community and business has invested in Whenuapai in reliance on:

- The Whenuapai Structure Plan (2016).
- The FULSS (refreshed 2017), which identifies much of Whenuapai as being 'development ready' in the period 2018-2022, and the balance from 2028.
- Plan Change 5 ('**PC5**'), which was a Council initiated plan change that proposed to rezone a large area of Whenuapai from FUZ to Light Industry Zone and various residential zones. PC5 was withdrawn in 2022.
- Significant Council investment in Whenuapai of at least $215m, including funding for the Northern Interceptor, the North Harbour 2 watermain, acquisition of parks and reserves, and the Trig Road South arterial consent application.
- Several Notices of Requirement for transport corridor upgrades throughout the Whenuapai area have been lodged by Te Tupu Ngātahi Supporting Growth. These have been notified and are to be heard in September this year.
- A significant existing urban area has been established to the north of Whenuapai Village, as a Special Housing Area ('**SHA**'), and a further SHA has been developed in the eastern part of Whenuapai.
- Council has approved private Plan Change 69, which rezones 52 hectares of land in Whenuapai from FUZ to Light Industry Zone. Significant public infrastructure upgrades are being undertaken as part of this plan change.

- Council has recommended approval of private Plan Change 86, which seeks to rezone 5.2 hectares of land from FUZ to Mixed Housing Urban Zone. The land is located immediately south-west of the existing Whenuapai Village and surrounds the Woolworths site.
- Council has granted numerous bulk earthworks consents that are expressly acknowledged as being required to facilitate urban development.

It is clear from this extensive planning work that Whenuapai is suitable for prioritised urbanisation, and there is no reason to delay that. Woolworths considers that the FDS should be amended to provide for the immediate rezoning of land in Whenuapai from FUZ to urban residential and business zones.

Woolworths also notes that the Upper Harbour Local Board, whose area includes Whenuapai, strongly supports the immediate urbanisation of Whenuapai. The Board's resolution from its meeting of 25 May 2023 requested "*that as a matter of urgency Auckland Council prioritise and fund the development of a detailed plan change for parts of Whenuapai zoned currently Future Urban*."

Conclusions and requested outcomes

1. A quality FDS will support economic competitiveness over the next 30 years. To prepare the draft FDS, the NPSUD requires engagement with the development sector and business (to identify significant future development opportunities and infrastructure requirements). Woolworths considers that the engagement has not been sufficient and the FDS should be delayed until such time as adequate engagement and consultation with stakeholders has been completed.

2. The significant realignment of strategic growth policy that is proposed in the FDS is not required or appropriate, and will undermine investor confidence. Woolworths considers that changes to Auckland's growth strategy should be subtle and only apply to new growth opportunities that are identified beyond the current 30-year planning timeframe.

3. The FDS seeks to rely exclusively on intensification of brownfield land within the existing urban area, while precluding greenfield development altogether. The proposed adoption of an intensification strategy without any provision for greenfield development relies on flawed or inaccurate evidence and assumptions and therefore cannot be seen as a robust approach. This includes using PC78 projections as a proxy for 'plan enabled' capacity, which is inappropriate given that submissions on PC78 have yet to be heard and there is some uncertainty about PC78's future. Woolworths considers that both intensification and new greenfield areas are needed to address Auckland's future growth, as is provided for currently through the Council's strategic planning documents. Furthermore, Woolworths requests that the FDS be deferred until such time as PC78 is operative and reliable evidence on development capacity is available.

4. Infrastructure funding for greenfield FUZ areas can be resolved through a combination of tools that are available now, including development contributions and direct funding by developers. The Council's perception that infrastructure cannot be funded is not a persuasive reason for completely rejecting any further growth in the FUZ.

5. Whenuapai should be a priority area for greenfield growth, as all elements to successful urbanisation are either in place or are able to be implemented. Significant planning has been undertaken to confirm the suitability of the land and infrastructure has been established at great cost to Council. Woolworths considers that the FDS should provide for Whenuapai to be rezoned now from FUZ to a combination of urban residential and business zones.

Woolworths appreciates the opportunity to provide feedback on Auckland Council's draft Auckland Future Development Strategy 2023-2053 and thanks the Council staff and elected members for their time in considering the matters that have been raised in this feedback. Woolworths would welcome contact from staff in the FDS team if any clarification or further information is required.

[redacted]

Philip Brown
Campbell Brown Planning Limited
For and on behalf of Woolworths New Zealand Limited as its duly authorised agent.

31 July 2023

Address for service of submitter:

C/- Campbell Brown Planning Limited
PO Box 147001
Ponsonby
AUCKLAND 1144

Attention: Philip Brown

[redacted]

Future Development Plan 2023 #8557

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Your feedback

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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.

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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?

ST MARY'S BAY ASSOCIATION

SUBMISSION OF ST MARYS BAY ASSOCIATION TO THE AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023 DRAFT CONSULTATION DOCUMENT

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1. Macro Planning Overview

- St Marys Bay Association (**SMBA**) notes that this strategy document is contrary to the advice provided to Auckland Council IN 2016, by the Independent Hearing Panel (IHP) which heard all submissions and made recommendations on the Auckland Unitary Plan (AUP). The IHP, after thorough investigation, saw no planning or resource management value in any Council policy that attempted to ration the availability of greenfields development land. The *Future Urban Zone* was put in place to indicate where the future development growth of Auckland can/should occur.

- The implementation of future urban growth is to be based on structure planning using the methodology set out in Appendix 1 to Chapter B of the AUP. Since 2013, this methodology has worked efficiently and has avoided the rationing of land by the territorial local authority. The IHP reflected seriously on the history of land allocation techniques imposed by the legacy Auckland Regional Council. The IHP was aware, through evidence, of the negative effect that the previous regime of land expansion allocation had on raising the value of land.

- In the opinion of the **SMBA**, the Future Development Strategy (FDS) attempts to reinstate discredited planning practices from the past which have fundamentally adversely affected the price of land and the affordability of housing in Auckland.

2. Constraints on Development (Part 3.2 page 28)

- This section of the FDS requires substantial expansion to provide a methodology for ensuring that constraints are managed in a manner that protects their integrity.

- For **SMBA**, the particular concern is the constraint of existing inground infrastructure and the constraint of the Special Character Area Overlay protecting the historical heritage and historical character of St Marys Bay.

3. Walkability

- The importance of this statement is that the Walkable Catchments which the Council's Plan Change 78 attempts to impose are contrary to this important conclusion in the FDS.

- **SMBA** endorses the Council's decision to promote a 10 minute easy walking distance in discussion of walkability at a local scale and within neighbourhoods at Part 4.1.3 of the FDS.

4. Cultural Heritage Constraints

- **SMBA** supports the identification of St Marys Bay as being fully covered by a cultural heritage constraint as set out on Figure 24, Appendix 1 of the FDS. This map confirms the arrangement in the AUP which has an operative Special Character Area notation over the majority of St Marys Bay.

- **SMBA** requests that this commitment is transposed into the Council's Plan Change 78 which would provide for the reinstatement of the Special Character Area over St Marys Bay as it is in the operative AUP.

5. Infrastructure Enhancement

- At Appendix 3, infrastructure to support development capacity across the region is noted in a three column table covering three decades starting in 2023. An important missing element from this infrastructure enhancement programme is the upgrading and improvement to the existing inground infrastructure, particularly in St Marys Bay where a 19th century combined wastewater and stormwater system still prevails.

- The FDS is obliged to meet the requirements of s.23 Health Act 1954 and ensure that the management of wastewater and stormwater within an urban area achieves a healthy outcome. At present, in high rainfall events, the inground infrastructure of St Marys Bay is regularly leading to overflowing drains, shower trays, toilet pans and street cesspits allowing sewage-contaminated stormwater to flood into the homes of residents in an uncontrolled manner.

- It is requested that the FDS addresses this issue of upgrading existing infrastructure so that it copes and provides for a safe and healthy environment

as intended by the Health Act 1954. This requires the separation of wastewater and stormwater systems and the provision of an overland flow path plan for St Marys Bay.

6. City Centre Urban Node

- This matter is covered in Appendix 5 of the FDS. It has unfortunately included the residential areas of St Marys Bay, Ponsonby, Freemans Bay, Grafton, and Parnell. The City Centre node must be reduced so that it follows the inner-city motorway boundaries and the area identified in the AUP as the City Centre Zone. The heritage inner city suburbs of Auckland cannot be regarded as potentially available for development. Any such assumption is contrary to Part 2 of the Resource Management Act 1991.

7. Conclusion

- If the Council intends to have further consultation on this document or hold any public hearings, **SMBA** requests to be involved and to be notified with at least 20 working days' notice.



Brian William Putt, Town Planner

For and on behalf of SMBA, July 2023

Address for service:

Brian Putt

Metro Planning Ltd

P O Box 90273 Victoria Street

AUCKLAND 1142

[redacted]

[redacted]

E: brian@metroplanning.co.nz

Future Development Plan 2023 #8558

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please refer to the attachment

#8558

FEEDBACK ON AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY

To: Auckland Council
Private Bag 92300
Auckland 1142

Attention: Future Development Strategy
futuredevelopmentstrategy@aucklandcouncil.govt.nz

By: CDL Land New Zealand Limited (**CDL**)

Executive Summary and Relief Sought

1. CDL, at the address for service below, provides this feedback on the Council's Auckland Future Development Strategy 2023 – 2053 Consultation Draft (**the draft FDS**) as follows. The feedback is both wide-ranging in respect to the principles proposed to guide future development and specific in respect of the proposed delay to live zoning and development-ready status for Whenuapai Stage 1.

2. CDL 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.

3. CDL opposes the strong bias set out in the draft FDS against greenfield development as a general starting point for accommodating future urban growth.

4. CDL 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.

5. CDL strongly opposes the suggestion that the draft FDS and any future versions would be enshrined as the only sequence of growth for Auckland.

6. CDL strongly opposes the suggestion that Whenuapai South future urban area should be delayed at all, and especially not until after 2035 as currently proposed by the draft FDS.

Process

7. CDL suggests that the process for feedback on the draft FDS is limited in its effectiveness. A more appropriate process would enable hearings for submitters who wish to present more fulsome evidence in support of their submissions. That process enables more meaningful engagement with key stakeholders, not least the

development industry who seek to work in partnership with Council and its organisations to deliver future urban development.

8. The drop-in sessions for select submitters were a step in the right direction but should not be assumed to effectively replace public hearings that give a fair opportunity for all interested parties to have a say and for submissions to be robustly heard and tested.

9. This aspect is reflected in CDL's relief sought in respect of this submission.

Introduction

10. CDL, at the address for service below, provides this feedback on the Council's Auckland Future Development Strategy 2023 – 2053 Consultation Draft (**the draft FDS**) as follows. The feedback is both wide-ranging in respect to the principles proposed to guide future development and specific in respect of the proposed delay to live zoning and development-ready status for Whenuapai Stage 1.

11. By way of background, CDL has extensive landholdings in the block bound by State Highway 16 to the west, State Highway 18 to the north, Trig Road to the east and Hobsonville Road to the south. The CDL land is approximately 14ha in area and has access to both Hobsonville Road and Trig Road (south). CDL's landholdings form a contiguous block that could be developed comprehensively and in a way that enables integration with the balance of the land in the block, as well as with the developing transport corridor in the urbanising environment of Whenuapai. For the avoidance of doubt, CDL's landholding is adjacent the identified "node" of Westgate metropolitan centre.

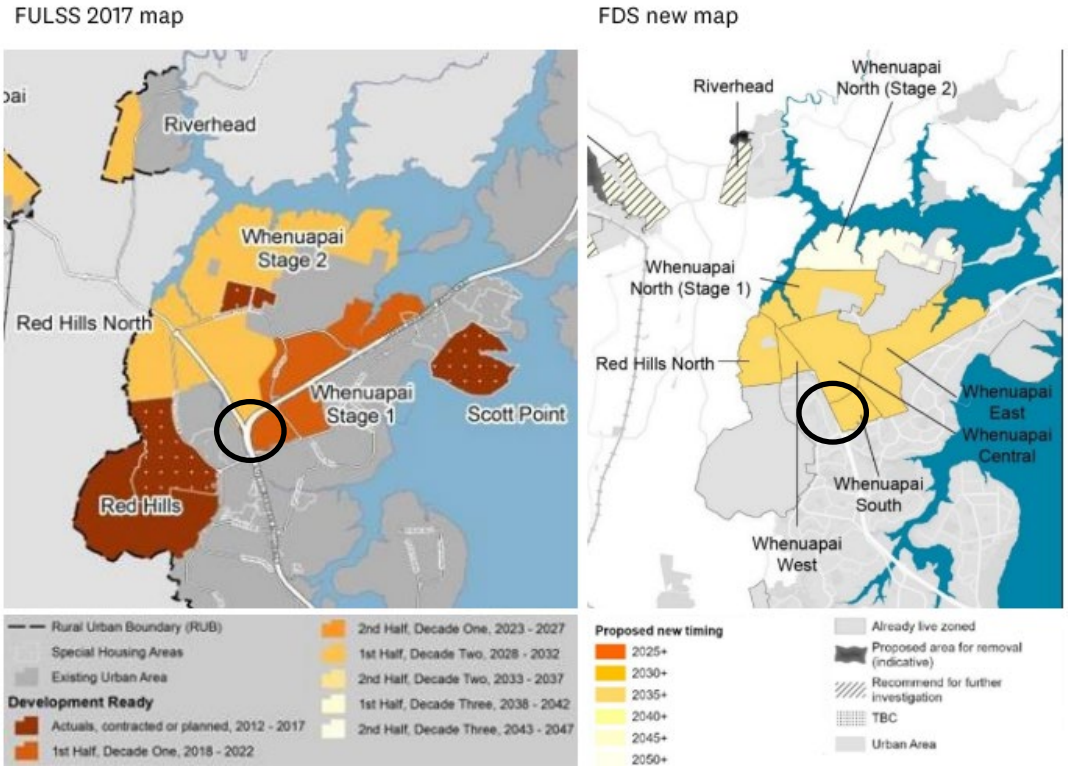
12. CDL has been extensively involved in planning processes that affect its land in Whenuapai, from the development of the AUP, the Whenuapai Structure Plan in 2016, throughout Plan Change 5 to the AUP and more recently in considering potential variation to PC5 and the implications of Plan Change 78 and associated National Policy Statement on Urban Development (**NPSUD**) plan changes. Finally, CDL has engaged with the recent swathe of Notices of Requirement that have been notified for the delivery (and/or route protection) of transport infrastructure in Whenuapai – specifically the alteration to the designation affecting Hobsonville Road, and the designation to upgrade Trig Road (south) to an arterial.

13. CDL has maintained a consistent view since the Proposed AUP was notified in 2013 that there are no constraints on the CDL land, and land within the block identified above more generally, that would preclude immediate delivery of integrated development and infrastructure.

14. CDL has identified for some time that its land and surrounding land can be urbanised in a comprehensive and intensive manner without generating adverse effects beyond the area, recognising its proximity to the metropolitan centre of Westgate and the aforementioned lack of constraints on immediate development delivery. Notwithstanding, CDL has been stymied from realising immediate delivery of development by the withdrawal of PC5 and the Council's subsequent retention of Future Urban zone on the land.

15. The draft FDS now proposes to delay live zoning and the "acceptability" of urban development (from Council's perspective) of CDL's land until after 2035. For comparison, the Future Urban Land Supply Strategy 2017 (**FULSS**) had previously suggested that Whenuapai Stage 1 would be development ready as of 2018 – 2022.

Figure 1: FULSS v draft FDS Whenuapai (CDL land circled in black)



16. The draft FDS suggests that this delay ought to occur in order to accommodate issues around infrastructure provision and funding. This matter plagued the PC5 process and was ultimately the reason that plan change, despite many years and significant (time and cost) investment by CDL and other motivated developers, was withdrawn by Council 5 years after notification.

17. The draft FDS identifies a suite of infrastructure upgrades required for Whenuapai Stage 1, which itself is further broken down into sub-areas. CDL's land is located

within Whenuapai South and the specific projects required to unlock that Future Urban area are listed as:

Whenuapai	Whenuapai *Live Zoned*	Brigham Creek Road upgrade
	Whenuapai South	Trig Road upgrade North-west Rapid Transit SH16 to SH18 Connections Hobsonville Road Upgrade Trig Road Water Reservoir, North Harbour No.2 Watermain Project Brigham Creek Pump Station Whenuapai Redhill Package 1 Whenuapai and Redhills Wastewater Scheme Northern Redhills to Brigham Creek Wastewater Project

18. These matters are addressed in the following feedback, however the summary response by CDL is that its landholdings, and those in the block bound by the State Highways, Trig Road (south) and Hobsonville Road do **not** require these upgrades in order to unlock urban development and that in all instances, initial or interim infrastructure connections can be delivered to enable a critical piece of the identified Westgate node to be unlocked.

Reasons for Feedback

General Principles Espoused by Draft FDS

19. 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.

20. The draft FDS identifies five principles for guiding growth and development. CDL makes the following comments in respect of these principles insofar as they relate to Whenuapai South in particular. At the outset, CDL 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.

21. Further, CDL 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.

22. Notwithstanding, the following comments are made.

Principle 1 – Support greenhouse gas emissions

23. Principle 1(a) makes a broad assumption that greenfield development will result in 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 VKT.

24. The Westgate Metropolitan Centre is identified as a key employment hub, and as being suitable for further development within Years 1-10 of the draft 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 employment and service 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.

25. At Appendix page 55, the draft 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*."

26. CDL agrees that the Whenuapai future urban area will support unlocking the Westgate node, however the draft FDS does not align residential growth and business growth simultaneously, despite that being a core tenet of the draft FDS to bring employment and services closer to residential areas. In the case of Whenuapai South, within an achievable walkable catchment (providing for some walking and cycling upgrades that either the Hobsonville Road designation upgrade or other localised transport upgrades could deliver with ease) of the Westgate Metropolitan Centre, and centrally located within the draft FDS' identified node, this residential development will not be possible until the decade following Westgate, and once 'live zoned' between Years 11-30 of the draft FDS timeframe, will take

several years to consent and construct. In the meantime, the Westgate Metropolitan Centre will continue to generate greater VKT to service and access.

27. CDL considers therefore that, as a minimum, the forecasted residential areas of Whenuapai South, should be reinstated as being development-ready now, i.e. brought forward in the draft FDS' sequencing, hand-in-hand with local business growth in order for the draft FDS to deliver on Principle 1.

Principle 2 – Adapt to the impacts of climate change

28. 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*".

29. While CDL 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.

30. 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 South is not subject to widespread flooding or inundation. Stormwater and streams can be readily managed in future development scenarios as guided by existing provisions in the Auckland Unitary Plan and National Environmental Standards of relevance, without detriment.

31. The draft FDS does not suggest Whenuapai South is affected by any such hazards.

Figure 2 – Whenuapai South flood hazard map



Principle 3 – Make efficient and equitable infrastructure investments

32. 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.

33. 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.

34. Developers are often forthcoming to deliver the infrastructure that is required to enable development. Equally, developers acknowledge the requirement to pay Development Contributions to wider or regional upgrades. Mechanisms such as public private partnerships or infrastructure funding agreements can expedite the delivery of shared infrastructure to unlock future urban areas. Many such options were presented to Council throughout the PC5 process as mechanisms to share the cost of infrastructure upgrades. This is re-stated for the purpose of highlighting that there are alternatives and other opportunities to deliver infrastructure other than relying on the public delivery of such, which will (as evidenced by the timeframes and delays discussed above) equally hold up the delivery of both residential and commercial development. Indeed, the provision of development contributions and

rates by residents and occupiers, would seem a vastly more sensible revenue stream to deliver identified infrastructure projects sooner.

35. These alternative funding propositions are not encouraged by the draft 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 Whenuapai Structure Plan and subsequently PC5.

36. Secondly, the significant delays to development readiness proposed in the draft 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 draft 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, upfront bulk 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.

37. This does not factor in a staged approach that can remain integrated in respect of delivering smaller pieces of a wider infrastructure masterplan in line with iterative growth over time, and/or better utilising other opportunities to fund infrastructure.

38. Instead, as articulated above, the draft FDS 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.

39. For Whenuapai Stage 1 and Whenuapai South, 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 Notice of Requirement (relating to Whenuapai) is yet to be notified some two years' later, demonstrating the significant lead-in time, even when funding is secured.

40. The draft FDS provides an opportunity to encourage developers and Council to achieve coordinated funding and financing, including to facilitate private contributions that 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 or infrastructure masterplan.

41. In the case of CDL's landholdings in Whenuapai South, the second half of this feedback articulates how it could stage development in an integrated manner with interim and ultimate infrastructure service provision.

42. In summary, CDL 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, and for the avoidance of doubt, that there is no existing infrastructure constraint that requires Whenuapai South being delayed by a further 12 years before development can be countenanced.

Principle 4 – Protect and restore the natural environment

43. Principle 4 seeks to protect, restore and connect ecosystems and to integrate the natural and built environment.

44. Greenfield developments often have land area to accommodate water sensitive design and to enhance the quality of wetlands, streams and other natural features. 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 must 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.

45. Comprehensive structure planning such as that undertaken in respect of the Whenuapai Structure Plan can achieve these outcomes. Indeed, the draft FDS acknowledges that structure planning is an important tool to identify opportunities for achieving this principle (and others) alongside growth. The Whenuapai Structure Plan is an established framework that PC5 and subsequent private plan changes have referenced, and development has occurred since its production in 2016 in accordance with its overarching themes.

46. 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

47. Principle 5 seeks to discourage growth in areas not already prioritised by Council, despite the NPSUD 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 not anticipated by RMA planning documents or is out-of-sequence with planned land release (Policy 8).

48. The draft 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) acknowledges that structure plans are already required by the AUP in plan change applications to establish the appropriate pattern of land use and infrastructure, opportunities and constraints, the effects of urbanisation on (and connectivity with) neighbouring areas.

49. Neither the draft FDS nor FUA Evidence Report suitably acknowledge the Whenuapai Structure Plan in this regard. 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 un-anticipated 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 Whenuapai, 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.

50. Further, CDL posits that the primary reason developers lodge plan changes, or other fast track processes, for so-called isolated landholdings is out of frustration with the long timeframes and expensive costs incurred when public plan change processes led by local authorities are unnecessarily drawn-out and often, as in the situation with the AUP PC5, have no tangible or material outcome.

51. The draft FDS states *"…future urban areas will be sequenced, with this sequencing linked to triggers dependent on when all the required bulk infrastructure can be provided."* The bulk infrastructure that is listed as being required in Whenuapai South is extensive and as discussed above, not all of which is required to be implemented before development commences. Specific to CDL, Whenuapai South

can be serviced independently of the balance of Whenuapai Stage 1. Therefore, there is no need to delay growth in Whenuapai South to 2035 or beyond.

52. The NPSUD 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 developer to deliver infrastructure that is required to service the development, as well as to provide or contribute to infrastructure that is identified as being required by a relevant structure plan or precinct plan. CDL acknowledges its requirements to fund infrastructure necessary to service its development as well to connect the site with the existing urban area and Westgate, consistent with the Whenuapai Structure Plan.

53. To appropriately deliver the intended outcomes of Principle 5, the draft FDS should build on the work undertaken to date as part of the structure planning for Whenuapai to enable 'self-serviced' development to progress in line with local business growth within the Westgate priority node.

54. CDL records its strong opposition to the suggestion by officers in their presentation of the draft FDS to Councillors that the sequencing it proposes should be enshrined in the Regional Policy Statement thus seeking to avoid the prospect of private plan changes that challenge the proposed sequence of growth. This is wholly at odds with the NPSUD and stymies efficient and widespread delivery of housing and employment opportunities in future urban areas.

Development Ready Status for Whenuapai South

55. The draft FDS cites infrastructure reasons to push development ready status for Whenuapai South from now to beyond 2035. As set out above, the shopping list of infrastructure upgrades is long and expensive and in CDL's view, is the gold standard of what is required to deliver growth in the entirety of Whenuapai Stage 1, not just the block identified as Whenuapai South.

56. CDL has always maintained that its landholdings and immediately adjoining land within the block bound by the State Highways, Trig Road and Hobsonville Road can be live-zoned now. CDL sought this outcome through the AUP hearing process and again fought for recognition of its development ready status through PC5. The evidence to support this position is wide-ranging and includes an analysis of infrastructure provision required to achieve urban development.

57. The draft FDS is simply the latest publication by the Council that fails to recognise the beneficial locational and physical attributes of Whenuapai South relative to the

wider Whenuapai future urban area that separate it from any perceived impediment to urban development.

58. The following attributes and servicing capabilities are addressed below relative to Whenuapai South.

Transport

59. 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 aforementioned Notices of Requirement.

60. CDL generally supports those Notices of Requirement, including the implementation of an arterial Trig Road and upgrades for Hobsonville Road. CDL has identified matters for further consideration in submissions on both those applications, which are proceeding.

61. It is understood that the upgrade of Trig Road has funding allocated via the Housing Infrastructure Fund, and that resource consents have been lodged alongside the Notice of Requirement for a new designation.

62. As it stands, CDL has access to existing Trig Road on its eastern boundary. On its southern boundary, CDL has access to an existing arterial being Hobsonville Road. Therefore, currently, development of CDL landholdings is not prevented by transport or access concerns, and particularly none that cannot be addressed through resource consents and localised, frontage upgrades. Arguably, development of the Whenuapai South future urban area will enable increased access and connectivity through the implementation of new roads, including collector roads, if deemed appropriate through further design and development.

63. The reference to “North-west Rapid Transit” as a requirement for development within Whenuapai South is not explained in the draft FDS. It is CDL’s understanding that this reference relates to the suite of corridor upgrades, including potential alternative state highway north-west of Westgate, commencing at or near Spedding Road and heading west towards Waimauku.

64. Noting the proximity of Whenuapai South to the identified Westgate node, CDL disagrees that these strategic, and significant, transport upgrades are necessary to unlock Whenuapai South for development in the immediate to short-term.

65. For the above reasons, it is considered there is no transport infrastructure reason to delay Whenuapai South any further in respect of enabling urban development.

Water Supply

66. The draft FDS suggests that the Trig Road water reservoir, the North Harbour No. 2 watermain project and the Brigham Creek pump station are required to be commissioned prior to Whenuapai South being development ready.

67. As noted, CDL has on several previous occasions presented evidence that supports the ability to service its landholdings with existing infrastructure, including water supply. The most recent was to PC5, when Mr Vaughan Crang provided expert engineering advice to the hearing panel identifying how this future urban area could be serviced. A copy of Mr Crang's evidence is appended to this feedback.

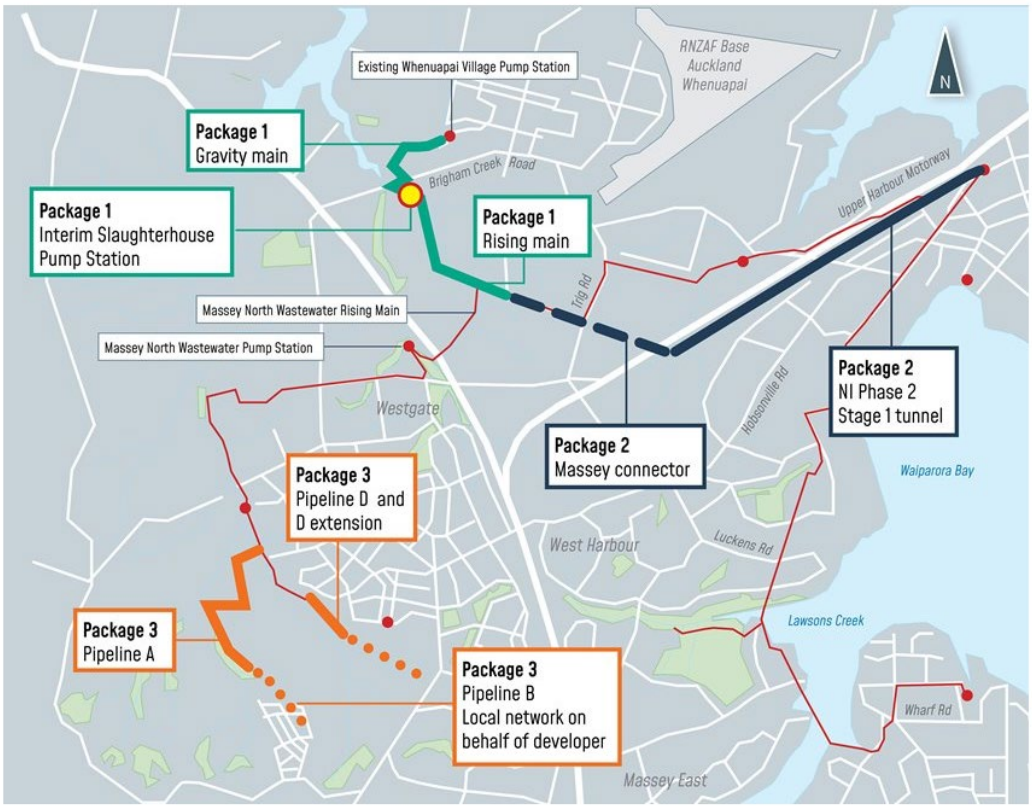
68. In summary, Mr Crang identified in 2018 that existing water supply infrastructure runs along Trig Road and a bulk supply point is located at the Trig Road / Hobsonville Road intersection. Watercare confirmed at that time that the reticulated water supply had sufficient capacity to service the area. Simple extensions from the existing network and bulk supply point would therefore be possible immediately and/or in the short term.

Wastewater

69. The draft FDS identifies the Whenuapai and Redhills wastewater scheme and Northern Redhills to Brigham Creek wastewater project as being required before urban development can occur in Whenuapai South.

70. Watercare identifies the Whenuapai and Redhills wastewater scheme as comprising the following illustrated works.

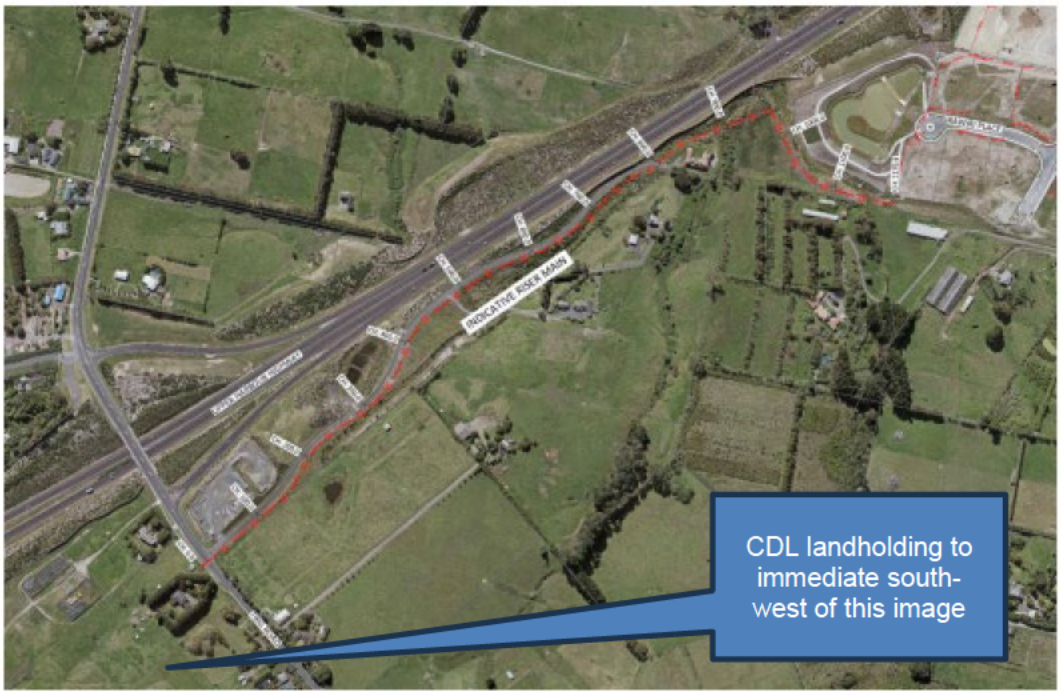
Figure 3 – Whenuapai and Redhills wastewater scheme



71. Respectfully, connections into Redhills will have no bearing on development ready status for Whenuapai South. Packages 1 and 2 are proposed to be completed by 2026. Even with a recognition in the draft FDS that Whenuapai South being development ready, it is highly unlikely that development on CDL's landholdings would precede that date – noting CDL still needs to obtain live zoning, obtain resource consents, then building consents and then construct development.

72. Mr Crang's evidence addressed the potential for interim or temporary connections for the site in advance of any global infrastructure provision, noting at the time of the PC5 hearing the expectation was that the Northern Interceptor would be required to service Whenuapai more broadly. Instead, Mr Crang identified that a temporary connection could be made to the existing wastewater main in Rawiri Place. Mr Crang identified an indicative route for that temporary connection, which was supportable by Watercare and illustrated below.

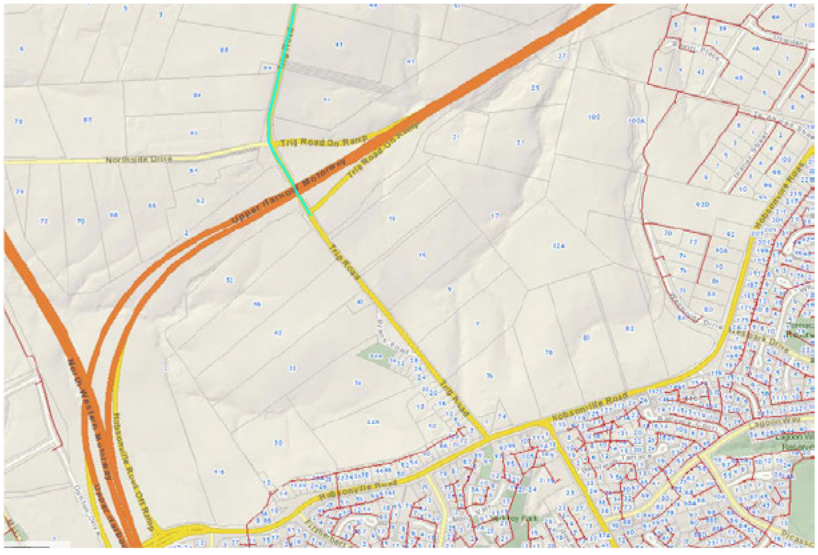
Figure 4 – Riser main temporary connection (excerpt from Appendix 1)



73. In addition, Watercare advised Mr Crang at the time that "there [were] developments that will extend the wastewater network further eastwards [from Rawiri Place]" and that a new pump station could be constructed at the north western most corner of the site to assist connection.

74. Council's Geomaps confirms Watercare's inference above, and wastewater infrastructure is now located closer to Whenuapai South at Westpoint Drive, as illustrated in the following image.

Figure 5 – Geomaps Wastewater Assets



75. None of the above is insurmountable, and would all be easily resolved through a consenting process following live zoning. To this end, it would appear wastewater infrastructure is no impediment to a development-ready status for Whenuapai South now.

Key Conclusions

76. CDL 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.

77. CDL opposes the strong bias set out in the draft FDS against greenfield development as a general starting point for accommodating future urban growth.

78. CDL 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.

79. CDL strongly opposes the suggestion that the draft FDS and any future versions would be enshrined as the only sequence of growth for Auckland.

80. CDL strongly opposes the suggestion that Whenuapai South future urban area should be delayed at all, and especially not until after 2035 as currently proposed by the draft FDS.

81. CDL would welcome the opportunity to meet and discuss the matters raised in this feedback. Moreover, CDL would be happy to present its position in any public forum, presentation or hearing, if proposed.

DATED at Auckland this 31st day of **July 2023**

Signed: [redacted]

Address for Service:

Kay Panther Knight
Forme Planning Ltd
Suite 203, Achilles House
8 Commerce Street
Auckland 1010
kay@formeplanning.co.nz

Appendix 1: Civil Engineering Evidence to PC5 on behalf of CDL

the Resource Management Act 1991

of Proposed Plan Change 5 - Whenuapai to the Auckland Unitary Plan (Operative in Part).

1.1 My name is Vaughan Paul Crang.

1.2 I am a consulting civil engineer and the director of Crang Consulting Ltd. I hold a Bachelor of Engineering (Civil) (Hons) degree from the University of Auckland. I am a Chartered Professional Engineer and a full member of Engineering New Zealand.

1.3 I have been retained by CDL Land New Zealand Limited (" ") to prepare and present this statement of evidence addressing matters raised in the company's submission on Plan Change 5: Whenuapai to the Auckland Unitary Plan (" ").

1.4 I have 25 years' experience in the fields of land development and infrastructure civil engineering. In the course of my work I have been the engineer in charge of many large projects including projects that involve sensitive environments and different geological conditions.

1.5 My area of expertise is in the design of earthworks, sediment controls, roading, stormwater reticulation, wastewater reticulation and water supply systems for land development projects. I am also experienced in the construction monitoring of projects and administering civil construction contracts.

1.6 I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2014. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving evidence. Except where I state that I am relying on the evidence of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

Scope of Evidence

1.7 In this statement I shall summarise how the site can be serviced with wastewater, water supply and utility services. I will also summarise, with reference to Bronwyn Rhynd's evidence, how stormwater can be managed across the site in accordance with the relevant Auckland-wide provisions in the Auckland Unitary Plan (" "). Finally, I will identify how earthworks can be carried out and how access can be provided to enable the land to be developed for intensive residential housing.

2.1 The key findings from my evidence are as follows:

- The proposed development area can be fully serviced by Watercare's existing wastewater infrastructure;
- Water supply can be provided to the proposed development area from existing Watercare infrastructure;
- Connection to utility services can be provided to the proposed development site;
- Stormwater reticulation and management devices can be installed to meet the AUP SMAF provisions.
- Earthworks are feasible to provide adequate building platforms and road access; and
- There is no reason from a civil engineering perspective that the land can't be developed immediately.

Wastewater

3.1 The site is currently served by a reticulated wastewater system along Hobsonville Road running along the rear of existing houses. This is the only reticulated wastewater system on the property at present. It does not have sufficient capacity for the development of the CDL Land.

3.2 Consultation with Watercare has confirmed that a new trunk sewer (Northern Interceptor) will run along the northern boundary of the site. This would provide the required capacity for the development. The works on the Northern Interceptor

are scheduled for 2020. This timeframe would suit CDL in respect of a development programme.

3.3 Watercare has also advised that until the Northern Interceptor is commissioned and to enable an immediate start on development that a temporary connection can be made to the wastewater main at 106-108 Hobsonville Road (now developed with a new road called Rawiri Place). This sewer is located approximately 1.1km to the east of the property. A sewer connection to Rawiri Place can easily be achieved for the project. Figure 1 below shows the location for the temporary connection and the Watercare advice is located at Attachment 1.

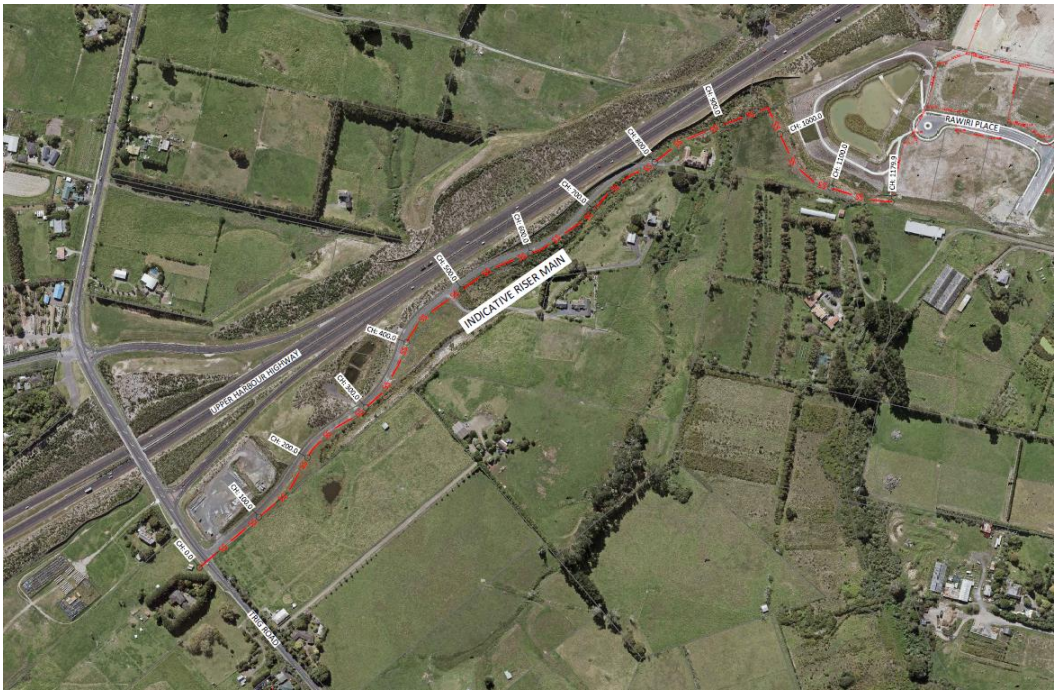


Figure 1-Riser main temporary connection

Water Supply

3.4 The site is well serviced with existing water supplies along Trig Road and at a bulk supply point (BSP) which is located at the Trig Road/Hobsonville Road intersection.

3.5 Watercare has advised that the reticulated water supply has sufficient bulk capacity to service the proposed development.

3.6 The existing reticulated water supply can be extended from the BSP or the Trig Road main to provide connections for each lot in accordance with Watercare and New Zealand Fire Service standards.

Utility Services

3.7 There are existing power, telecommunication and gas service along Hobsonville Road and these can be undergrounded and extended to provide adequate services for each lot within CDL's land.

Stormwater

3.8 A reticulation network can be provided for the development of the land in accordance with Auckland Councils Stormwater Code of Practice.

3.9 Stormwater management devices such as wetland, rain gardens, retention tanks can also be provided as part of the development to achieve the requirement of the stormwater management plan.

3.10 Bronwyn Rhynd has provided a comprehensive assessment of how any development could utilise existing watercourse and wet areas to assist in delivering an effective and naturalised integrated stormwater management system on-site, in accordance with the AUP Auckland-wide provisions on stormwater, including the proposed SMAF overlay.

Earthworks

3.11 The proposed development will require land modification to form the roading network, install pipe networks, overland flow paths and building platforms which is normal as required for an urban development. The proposed earthworks can be designed to achieve a balanced cut to fill operation.

3.12 Sediment and erosion control measure during earthworks such as clean water diversion channels and sediment retention ponds can be installed following the criteria and guidelines provided in Auckland Council's GD05 "Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region". This will ensure any effects on the environment from the required land modifications are less than minor, including in proximity to watercourses and their riparian margins.

Roading Network

3.13 The site has access to Hobsonville Road and Trig Road. These access points are shown on the revised Precinct Plan 2 attached to the evidence of Kay Panther Knight.

3.14 I have assessed the land topography and consider that the roading network can be designed to Auckland Transport's Code of Practice including the requirement of a maximum grade of 12.5%.

3.15 Roads will be provided with stormwater controls including kerb and channel, traffic calming pedestrian footpaths and other features can be provided as for normal roading projects.

4.1 It is considered that there are no civil engineering or infrastructure impediments that would restrict the immediate delivery of development on this land. Any related effects on the environment when the land is developed can be mitigated or avoided using best industry practices so that they would be less than minor.

4.2 For these reasons, and those noted in the evidence of other experts on behalf of CDL, I consider the relief sought, and as outlined in Kay Panther Knight's evidence in particular, is appropriate.

ATTACHMENT 1

[redacted]

Subject: RE: Hobsonville Rd/ Trig Rd Catchment

Hi Vaughan.

Council is undertaking structure planning in the Whenuapai area, including this area of land, now. Their structure planning process will define the land use for this area, to confirm likely flows and the like.

Having said that, that timing sounds OK, unless you are expecting to connect to the Northern Interceptor, which would likely allow a gravity solution. To meet your timing your client will likely need to construct a new pump station at the north western most corner of the sites, making allowances for the Northern Interceptor, and connect it to the existing network across Trig Rd. As we sit here today, the connection point is located in the site 106-108 Hobsonville Rd, but I believe that there are developments already approved that will extend the wastewater network further eastwards, but I don't know exactly where they will end up.

Hope this gives you enough information for now, but happy to meet if you still want to. I have some time next Tuesday morning, Wednesday, or Thursday afternoon.

Regards,

Chris Allen
Wastewater Strategy Manager
Watercare Services Limited

73 Remuera Road, Remuera, Auckland 1050
Private Bag 92 521, Wellesley Street, Auckland 1141

www.water.co.nz

From: [redacted]
Sent: [redacted]
To: CAllen (Chris)
Cc: Jason Adams
Subject: Hobsonville Rd/ Trig Rd Catchment

Hi Chris,

Our client, CDL Land NZ Ltd, own a number of properties and have others under contract in the catchment bordered by Trig Road, Hobsonville Road and the motorways. We are about to start investigations into how the land can be serviced, timings etc. A submission has been made to the unitary plan for the land to be rezoned residential.

At the moment the initial thinking on timing is as follows:
2016-2018 – Structure planning, rezoning and consents
2019 – 1st stage of development (between 50 and 100 lots)
2020 onwards – subsequent stages

We are mindful of your wastewater constraints in the area and the forecast works on the Northern Interceptor for 2020.

Can we please meet for an initial discussion. Would you be available sometime next week.

Regards

Vaughan Craig
[redacted]

Future Development Plan 2023 #8562

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

The above assumptions are not based on factual evidence. Evidence indicates that greenfield land is less costly to develop and can be more efficient in terms of responding to the effects of climate change; providing for a well-functioning urban environment; delivering the required infrastructure and providing choices for where and how people live and work. The FDS should strike a balance between providing for
urban consolidation and greenfield development to contribute to housing supply, affordability and choice.

Accessible local centres

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

The sites are located in close proximity to open spaces and employment areas, and the SLUS indicates a future local centre within proximity to the sites.

In any event, proximity to workplaces, services, facilities and shops are matters that are typically addressed in detail in plan changes.
There is already a clear policy framework in the Unitary Plan and the NPS UD that requires these aspects to be thoroughly considered in any proposed re-zoning.

Avoiding hazards

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

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

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

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

Tell us why

Greenfield development often responds better, and the response is more efficient, in terms of managing potential hazards.
The existing policy and legal framework require hazard risk to be fully assessed through any proposed plan change process.

Resilient infrastructure

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

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

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

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

Tell us why

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

Other feedback

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

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

There is no factual or evidential basis to support the approach set out in the draft FDS. The draft FDS will create uncertainty and reduce opportunities to create well-functioning urban environments that will have longevity in terms of quality now and into the future.

All Seasons Properties Limited seek that the FDS does not delay the timing for urbanisation of the Redhills North Future Urban land.

All Seasons Properties Limited wish to be heard in support of their submission and request hearings be held to facilitate this outcome.

#8562

31 July 2023

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

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY

This Feedback details the submitter, the affected properties and responds to the provisions of the FDS in high-level and specific ways including addressing the matters that Auckland Council has invited specific feedback on the Have Your Say webpage.

Submitter Details

This feedback is provided on behalf of:	All Seasons Properties Limited
Property or Interest Affected by the FDS:	[redacted]

Address for Service

Name:	The Planning Collective [redacted]
Email Address:	[redacted]
Phone:	[redacted]

Property Details

The submitter owns the land at [redacted].

[redacted] is legally described as Part 2 DP 35878 (held in Record of Title Identifier 5193294) and comprises of 9,798m^2. The site is leased to an occupied by Lendich Construction Limited who are a construction and earthmoving business. The business has operated from the site for 24 years, noting that Lendich Construction have been operating for over 65 years and currently employs approximately 20 staff with demand for at least another 10 - 30 staff members.

[redacted] is legally described as Lot 1 DP 96016 (held in Record of Title Identifier 479892) and comprises of 1.9187 hectares. The site contains a barn shed within the western portion of the site and the balance of the land is in pasture. An aerial image of both sites is provided in Figure 1 below.

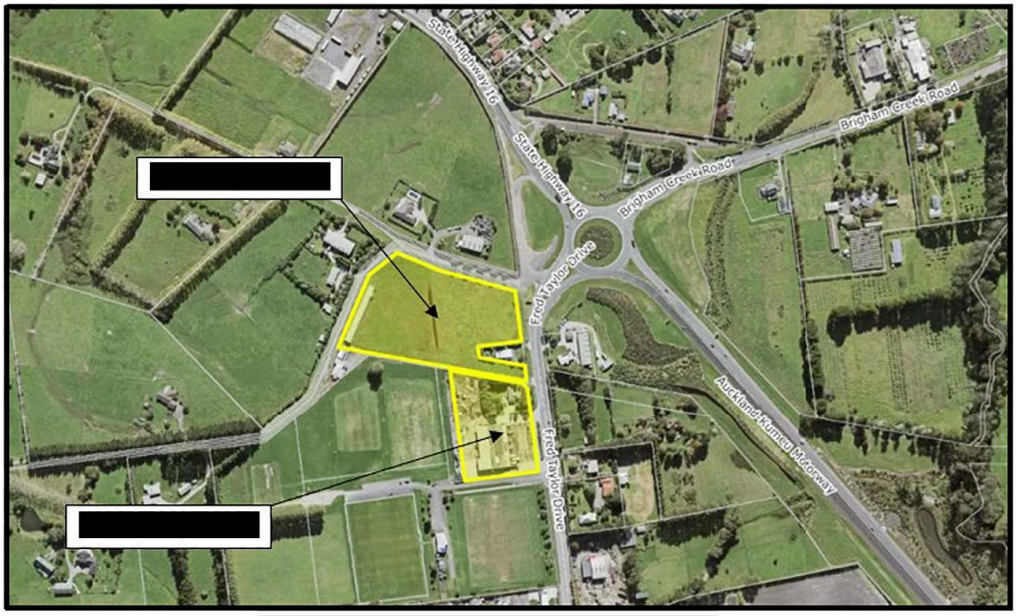


Figure 1 - Aerial image of [redacted] (source: Grip Maps, July 2023)

Both sites are zoned Future Urban in the the Auckland Unitary Plan (Operative in Part) (**"AUP-OP"**) as shown in Figure 2 below.

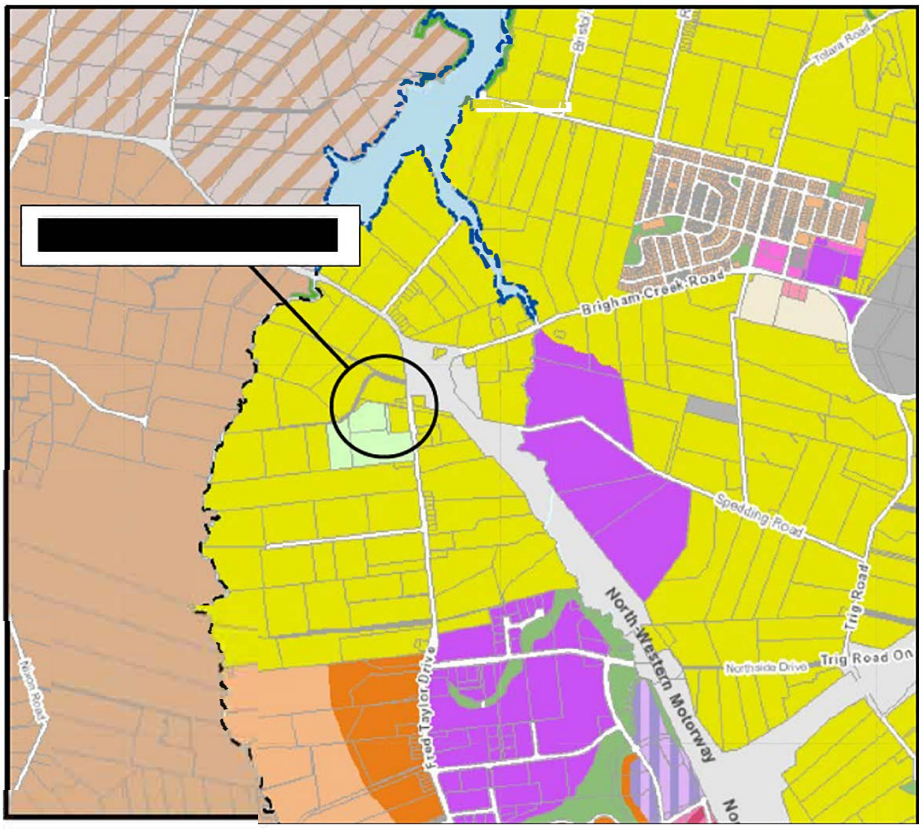


Figure 2 - AUP-OP Maps (source: AUP-OP GeoMaps, July 2023)

The sites are identified in the Auckland Council Future Urban Land Supply Strategy 2017 (**"FULSS"**) as being scheduled to be '*development ready*' between 2028-2032.[1] There is presently no Auckland

[1] Refer to Table 1, page 13 of Auckland Council Future Urban Land Supply Strategy 2017. The sites are contained within the Redhills North future urban land area.

Council, or other structure plan to guide the future land use or development for this area of Future Urban zoned land, however strategic land use plans to inform transportation planning have been prepared.

The Auckland Council Spatial Land Use Strategy- North West 2021 (**"SLUS"**) was prepared to inform future transport networks for the Kumeu-Huapai, Riverhead and Redhills North future urban areas. The SLUS identifies the preferred option for the future land use of the site as 'Future Residential or Other Uses' as shown in Figure 3 below.[2]

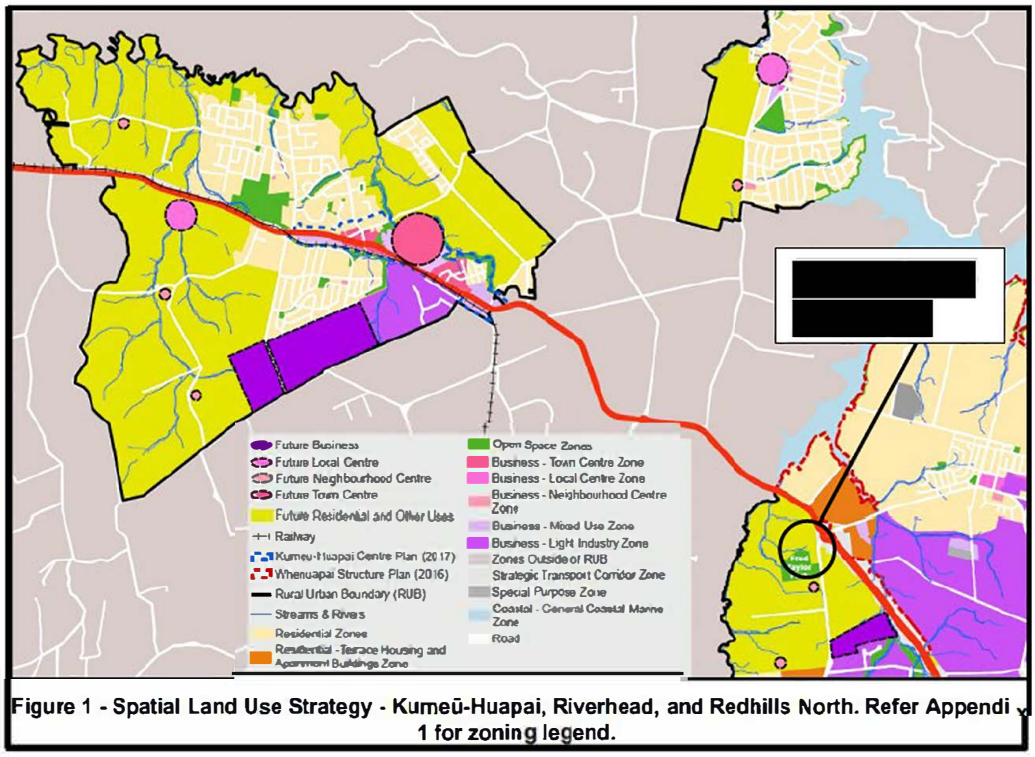


Figure 3 – Spatial Land Use Strategy for North-West Auckland

The sites are located approximately 1km from the Redhills urban area along the southern portion of Fred Taylor Drive and approximately 1.65 km from the Whenuapai local centre to the east.

Auckland Council recently approved Private Plan Change 69 ("PC69") which authorised the rezoning of approximately 52 hectares of land along Brigham Creek Road and Spedding Road from Future Urban to Business - Light Industry. PC69 was made operative on 12 March 2023.

High-Level Feedback

The National Policy Statement – Urban Development 2020 (updated May 2022) (**"NPS-UD"**) requires every Tier 1 and 2 Local Authority to prepare a Future Development Strategy ("FDS"). Subpart 4 of the NPS-UD states that an FDS must be prepared and made publicly available *"…every 6 years and in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority"*. The FDS has to apply to the urban environments of Tier 1 Local Authorities i.e. Auckland.

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

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:

(a) to promote long-term strategic planning by setting out how a local authority intends to:

(i) achieve well-functioning urban environments in its existing and future urban areas; and

(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) Every FDS must spatially identify:

(a) the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3; and

(b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and

(c) any constraints on development.

(3) Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.

Well-functioning urban environment has the meaning set out in Policy 1 of the NPS-UD:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households; and

(ii) enable Māori to express their cultural traditions and norms; and

(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

Clause 3.14 states the FDS must be informed by:

(a) the most recent and applicable Housing and Business Development Capacity Assessment ("HBA"),

(b) *a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS*
(c) *the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans*
(d) *Māori, and in particular tangata whenua, values and aspirations for urban development*
(e) *feedback received through the consultation and engagement required by clause 3.15*
(f) *every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement*
(g) *any other relevant national policy required by, or issued under, legislation.*

Clause 3.17 requires every local authority to have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

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

It is apparent that Council has initiated a crack-down on greenfield developments and a freeze-control to the existing urban form and growth pattern. This has been misinformed by its own manufactured financial constraints, outdated Housing and Business Development Capacity Assessment ("HBA") and preference for ad-hoc infill development which in turn only delivers myopic, piecemeal infrastructure solutions or 'bandages'. This leaves our infrastructure (and its ability to support urban development) in a constant state of deficit/catch-up, rather than being efficiently and effectively "future-proofed" to accommodate long-term growth.

In reality, the uptake of development capacity will mostly be realised by the private sector and not Auckland Council. This has been clearly demonstrated over the last 7-years since the Unitary Plan became operative. Auckland Council has notified one plan change (Whenuapai), which was so defective that it eventually had to be withdrawn. This means the growth demand will, in reality, be met by the actions of developers who will deliver and/or support the majority of prosperous, inclusive, and vibrant communities, and put in the legal mechanisms and physical infrastructure to realise greenhouse gas emission reductions. Developers pay the upfront costs for service networks and now more commonly transmission networks (as a minimum) and pay for development contributions and infrastructure growth charges.

The submitter requests that the FDS recognises and reinforces the significant role of future urban areas (for Auckland, the "Future Urban Zone") make in terms of their ability to deliver affordable urban development and create a variety of housing and living environments as well as integrated employment areas. But at the same time, the FDS needs to recognise it is not realistic for the growth demand to be met and infrastructure issues to be resolved if greenfield development is constrained, at least to the extent proposed in the FDS. The FDS needs to provide a pathway for growth outside the current urban form, where it can deliver better-functioning communities (rural and urban), ecosystems and more resilient interconnecting infrastructure networks.

Consultation and Engagement:

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

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

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

Given the above, Auckland Council must take into account feedback provided by land developers, and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS. The purpose being (as set out above) to achieve well-functioning urban environments in existing and future urban areas now and over the long term (30 years).

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

Site Specific Feedback

The FDS seeks to delay the urbanisation of Redhills North from 2028-2032 in the FULSS to the 2035+. The bulk infrastructure projects required to facilitate urban development of the Redhills North future urban area are:

- North-West Rapid Transit
- Fred Taylor Drive Upgrade
- Trig Road Water Reservoir, North Harbour No.2 Watermain Project
- Brigham Creek Pump Station Whenuapai Redhill Package 1
- Whenuapai and Redhills Wastewater Scheme
- Northern Redhills to Brigham Creek Wastewater Project

The urbanisation of the Redhills North future urban area should not be delayed for the following reasons:

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

- It is more practicable to plan and develop the above bulk infrastructure projects alongside the urbanisation of the land to ensure that the infrastructure has sufficient capacity to service the urban land uses.
- The Redhills North future urban area is in a prime location for urban development given its proximity to the existing urban area (within southern portion of Fred Taylor Drive) and the Plan Change 69 land recently rezoned to Business - Light Industry.

- The development that has occurred within the site's vicinity signals a clear need for urban land which the Red Hills North future urban area can deliver.

- It is incorrect to assume that Auckland Council solely fund the provision for infrastructure. Private developers are largely responsible for the funding and delivery of infrastructure by way of subdivision and land use consents, infrastructure growth charges and development contributions.

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

Specific Feedback in Response to Have Your Say

Focusing Growth:

Focusing growth

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

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

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

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

The above assumptions are not based on factual evidence. Evidence indicates that greenfield land is less costly to develop and can be more efficient in terms of responding to the effects of climate change; providing for a well-functioning urban environment; delivering the required infrastructure and providing choices for where and how people live and work. The FDS should strike a balance between providing for

urban consolidation and greenfield development to contribute to housing supply, affordability and choice.

Accessible Local Centres:

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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.

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

The sites are located in close proximity to open spaces and employment areas, and the SLUS indicates a future local centre within proximity to the sites.

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

There is already a clear policy framework in the Unitary Plan and the NPS UD that requires these aspects to be thoroughly considered in any proposed re-zoning.

Avoiding Hazards:

Avoiding hazards

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

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

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

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

Greenfield development often responds better, and the response is more efficient, in terms of managing potential hazards.

The existing policy and legal framework require hazard risk to be fully assessed through any proposed plan change process.

Resilient Infrastructure:

Resilient infrastructure

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

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

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

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

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

Conclusions and Outcomes Sought

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

There is no factual or evidential basis to support the approach set out in the draft FDS. The draft FDS will create uncertainty and reduce opportunities to create well-functioning urban environments that will have longevity in terms of quality now and into the future.

All Seasons Properties Limited seek that the FDS does not delay the timing for urbanisation of the Redhills North Future Urban land.

All Seasons Properties Limited wish to be heard in support of their submission and request hearings be held to facilitate this outcome.

Yours sincerely

[redacted]

The Planning Collective Limited

[redacted]

End of Report

Future Development Plan 2023 #8563

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.

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Tell us why

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

Tell us why

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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.

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?

#8563

AVJennings

FEEDBACK ON THE AUCKLAND COUNCIL'S DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023-2053

To: Auckland Council

Name of submitter: AV Jennings

This submission provides feedback on the Auckland Council's draft Auckland Future Development Strategy 2023-2053 ("FDS").

AV Jennings is a highly experienced land developer, who were one of the lead land developers involved in the redevelopment of Hobsonville Point and currently Ara Hills, Orewa. Hobsonville Point is a highly celebrated urban development project that models best practice housing outcomes. AV Jennings have assisted in the delivery of over 2,000 homes in New Zealand.

In the Auckland context, AV Jennings has been involved in the delivery of a wide range of housing and land development projects including both brownfield and greenfield developments.

AV Jennings is currently developing the Ara Hills site located at Upper Orewa (see **Figure 1** below), with Stages 1 and 3 developed delivering approximately 200 dwellings. This site is presently zoned Future Urban Zone (FUZ) but has an underlying resource consent[1] to deliver 575 lots, including 17 mixed use lots, ranging from 230m^2 up to 2,000m^2, roads and utility/recreational reserves to vest, the taking of water for domestic consumption, the diverting, bridging and reclamation of streams, associated earthworks and vegetation removal and re-planting, and the discharge of stormwater and occasional wastewater overflows.

In addition to the provision of housing, AV Jennings has, at its cost, delivered significant infrastructure to support this new urban community that will eventually include the wider western FUZ extents, including an arterial road width on Grand Drive, local roading network, public walkways and amenity areas, an infrastructure network including wetlands and pump stations ($2-3 million) and shared path across the motorway ($4 million).

A private plan change is currently being considered by Council to rezone the site to a suite of residential, open space and business zones that seeks a development yield of 900 dwellings. As such, The site comprises consent enabled development ready land that will be urbanised in the short term.

[1] Council reference BUN20441333

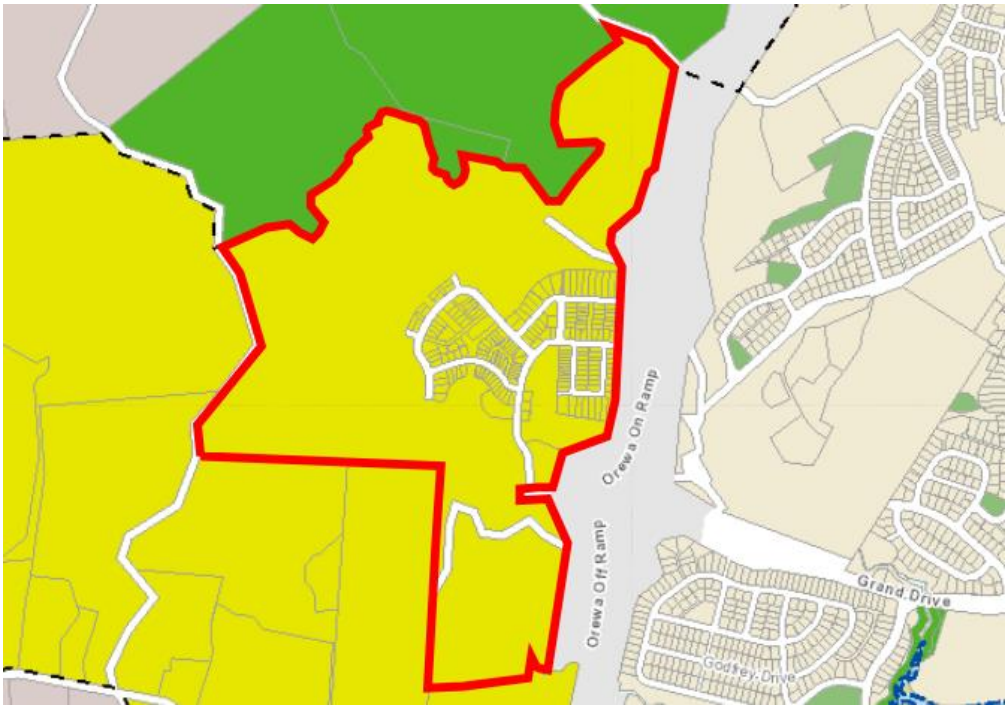


Figure 1 – Ara Hills (Hall Farm)

We note that under the Auckland Future Urban Land Supply Strategy dated 7 July 2017 (FULSS), the site is identified as the Upper Orewa resource consent area to be sequenced pending outcome of resource consent process. This is indicated in **Figure 2**.

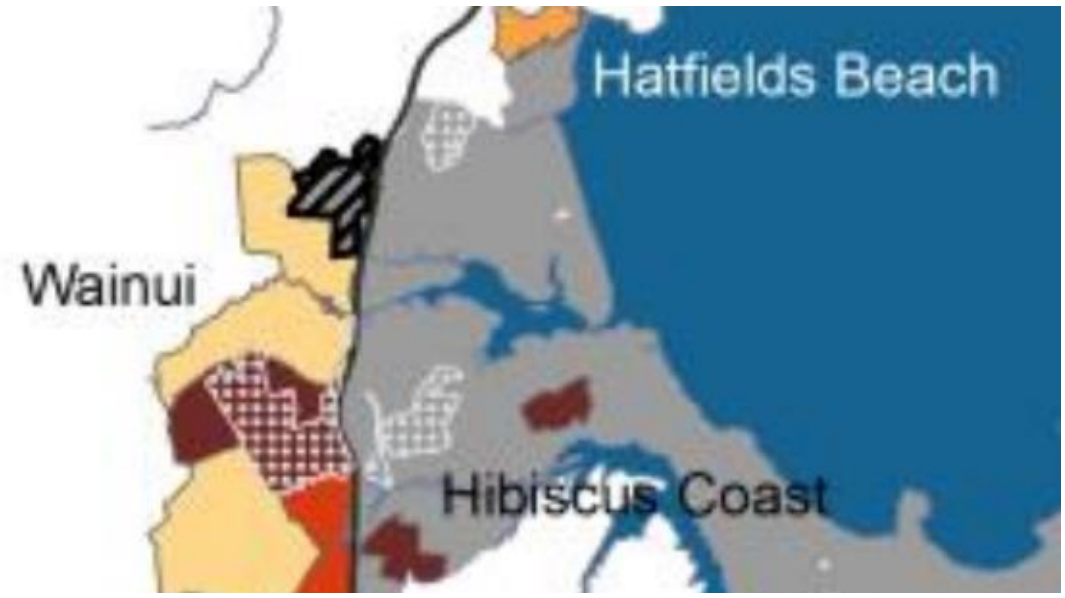


Figure 2 – Auckland Future Urban Land Supply Strategy Map

The submitter has the following feedback in relation to the provisions noted above:

1. That the current FDS is withdrawn for the reasons set out in the following feedback and the Council reengages with the community and key stakeholders to reconsider the approach to the FDS.

2. That the urbanisation of Ara Hills Hall Farm), Upper Orewa is accurately captured in any eventual FDS document, and is noted as development ready land.

The reasons for the submitter's feedback are:

Introduction

1. AV Jennings has significant concerns with respect to the Consultation Draft of the Auckland Future Development Strategy 2023-2053 ("the FDS"). It does not appear to accurately identify the existing and consented urbanisation occurring across the Ara Hills development site in Upper Orewa nor the plan change request lodged with Council. Refer map from the FDS for Orewa in **Figure 3** below that identifies the site as 'TBC'.

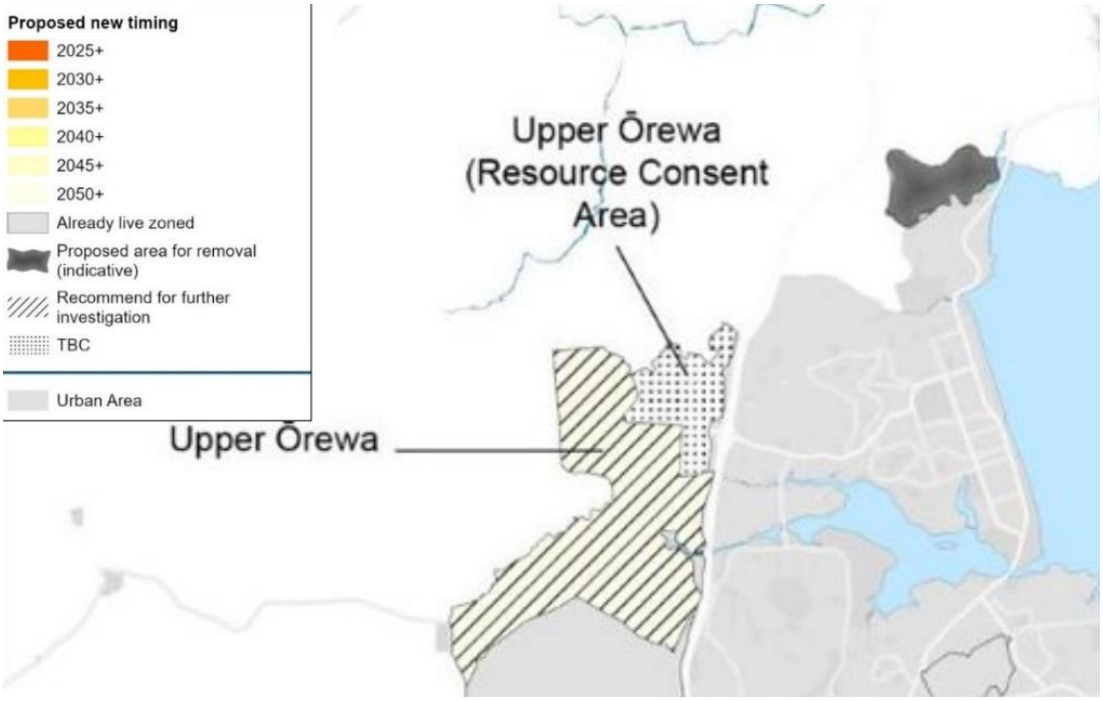


Figure 3: Proposed timing and approach for Upper Orewa Future Urban Areas

2. Appendix 7 and 8 to the draft FDS do not reference or identify the development occurring at Ara Hills rather it identifies an FDS timing of 2050+. This does not reflect the existing urbanisation occurring nor that which is imminent. AV Jennings consider that this is a significant omission.

3. Furthermore, and at a wider level AV Jennings is deeply concerned about the significant shifting of policy settings in the draft. This approach creates significant investment uncertainty. Many land developers, including AV Jennings rely on clear and consistent policy positions when undertaking expensive long term investment decisions. The approach of the Auckland Council in releasing the FDS in its current form, is in AV Jennings view, very unfortunate.

4. AV Jennings notes that Auckland's anticipated population and dwelling growth over the next 30 years has been planned for under the approved Auckland Plan 2050. AV Jennings generally supports that Plan. AV Jennings notes that under the current strategic framework, around 62 per cent of development over the next 30 years is anticipated to be within the existing urban area. The remaining development is anticipated to occur in future urban areas (32 per cent) and in rural areas (6 per cent).

5. Within this long-term strategic planning context, there is a need for consistency and certainty to enable efficient public sector investment in infrastructure and private sector delivery of development projects. While a review of the FDS is required (clause 3.16 of the NPS-UD) in order to align with three-yearly Long-term Plan cycles, significant change at these times is not considered to be appropriate as it will undermine public confidence in a consistent approach to strategic planning.

6. AV Jennings considers that greenfield development within the Future Urban Zone ("the FUZ") is part of the solution to managing Auckland's growth. It is accepted that intensification (infill) of the existing urban area is also an important means of accommodating growth. However, the two approaches can and should co-exist, in order to provide housing choice, efficient provision of infrastructure, homes close to existing sub-regional centres and towns, workplaces adjacent to existing transport infrastructure and residential growth areas, and resilience in the face of climate change. AV Jennings is of the view the coexistence of both greenfield and infill housing will provide the best opportunity of supporting a competitive land and development market.

7. FUZ areas recommended for "further investigation" or "TBC" on the FDS maps (refer Figure 13) are vague, uncertain and omit the Ara Hills development area in Upper Orewa. There can be no reliance on the retention of the FUZ on that land over the longer term. Identifying land in that manner in the FDS is not an appropriate approach for a strategy that is intended to provide development and investment certainty. It needs to accurately reflect the development occurring on the ground in Ara Hills.

8. Long-term identification of future urban areas (2050+, for example) contributes to planning blight of the land over an extended period. The effect of significantly delayed urbanisation on land that has been signalled for such growth is lack of investment, removal of any significant productive potential, and creep of unauthorised urban activities. The amenity of such areas is greatly reduced, and that is a poor outcome if sustained for any significant period.

9. There is also an element of natural justice and fairness to consider in relation to the draft FDS. Developers, investors, and the public generally will have made decisions based on the current FULSS and the broader development strategy contained in the Auckland Plan 2050. Anyone purchasing land in the FUZ will have paid for the land based on a value that is heavily influenced by the clearly signalled development potential. The only discount applied, relative to 'live-zoned' urban land, is that relating to timing. An investment of this nature, where the future development potential is now being removed or substantially delayed, could result in financial ruin. Guiding strategy documents around urban growth should not be altered in any significant way.

10. AV Jennings understands that experience in Auckland since the advent of the AUP and the Auckland Plan 2050 has shown that, even with greenfield land available, at least 80% of new residential development has been established within the existing urban area. Auckland is well ahead of its intensification targets established in the AUP and Auckland Plan 2050, and further intervention is clearly not required.

11. AV Jennings notes that the current the FULS outlined a programme for rezoning key parts of Auckland to enable growth. The only growth area subject to an Auckland Council plan change was Whenuapai (Plan Change 5). That public plan change was withdrawn by Council because of financial problems over infrastructure.

12. AV Jennings notes that all other plan changes in north, west, east and south Auckland have relied on private plan changes to deliver the outcomes of the FULS. Without the private sector business and residential land supply (and housing costs) in Auckland would have been even more constrained.

13. AV Jennings considers that it is critical for Auckland that private investment and the provision of greenfield land is part of the solution.

National Policy Statement on Urban Development 2020 ("the NPS-UD")

14. AV Jennings notes that the purpose of the FDS, as required by the National Policy Statement on Urban Development 2020 ("the NPS-UD"), is to set the high-level vision for accommodating urban growth over the long term and to identify strategic priorities to inform other development related decisions, such as the provision of infrastructure. The FDS seeks to promote long-term strategic planning by setting out the means by which a local authority intends to achieve a well-functioning urban environment, provide sufficient development capacity over the next 30 years, and integrate planning decisions with infrastructure planning and funding. This is intended to assist in deliver 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 as required by Objective 1 of the NPS-UD.

15. AV Jennings also notes that Objective 2 of the NPS UD seeks to ensure that planning decisions improve housing affordability by supporting competitive land and development markets. From AV Jennings perspective, it is important that sufficient opportunities are provided for a wide range of housing types and locations. This should include both Brownfield and Greenfield land. In AV Jennings view, this will provide the best opportunity to ensure suitable housing supply, the provision of housing choice and a competitive land market.

16. AV Jennings supports the NPS-UD and intent of the FDS approach generally. It is important that Local and Unitary Authorities operate with a long term planning horizon to ensure that sufficient suitably live zoned land is made available to meet the short, medium and long term needs of the community.

17. AV Jennings opposes the FDS being embedded into the Regional Policy Statement to restrict plan changes in FUZ. This will remove opportunities for advancing the urbanisation of land, where

that can address housing needs and where issues such as the provision of infrastructure have been resolved.

Further analysis, consultation and engagement is required before the FDS adopted

18. AV Jennings notes that under clause 3.15 of the NPS-UD, the Council is required to engage with a range of parties to prepare a draft FDS, including other relevant councils, central government, hapū, and iwi, infrastructure providers, and the development sector. The broader requirements in Policy 10 require the Council to *"engage with the development sector to identify significant opportunities for urban development*". Engagement with the development sector is also required to identify infrastructure requirements.

19. AV Jennings considers that the Council has not complied with its requirements under clause 3.15 of the NPS:UD and Policy 10. Based on the information provided by the Council the following consultation was undertaken prior to notification of the draft FDS:

    (a) a survey was sent to property developers on the Council's database to understand developer trends and future intentions[2]; and
    (b) the Council engaged with The Property Council.

20. AV Jennings are a key stakeholder in the development sector in Auckland and own a significant portion of the Upper Orewa FUZ. AV Jennings were not sent a survey or provided an opportunity to engage or contribute to the FDS. AV Jennings is unable to identify any property developers who were surveyed by the Council. It does not appear that the Council surveyed a large proportion of developers in Auckland.

21. AV Jennings considers that the FDS should be withdrawn and reconsidered following meaningful consultation with the development sector and landowners in the FUZ. It should also be delayed pending the central government elections, the review and approval of Plan Change 78 and the completion of the business land capacity study.

22. In preparing an FDS in accordance with clause 3.15 of the NPS:UD, local authorities must use the special consultative procedure in section 83 of the LGA.. Section 83(1)(d) of the LGA provides that the Council must "*provide an opportunity for persons to present their views to the local authority in a manner that enables spoken interaction between the person and the local authority ...".*

23. Based on the information available on the Council's website, the Council is proposing to make changes to the FDS in response to written feedback and adopt the FDS in late 2023 without holding a public hearing. This approach is entirely inconsistent with the LGA. While the Council belatedly provided for one day for feedback, this invitation was not sent to AV Jennings (or a number of large developers) and the limited dates that were provided were already fully booked.

24. The special consultative process is generally applied to matters that have high significance to the community and may have major implications. As set out above, the FDS will have a material impact on growth and development in the Auckland region. Developers, and the public generally,

[2] We understand that the survey was sent to people who had recently lodged a building consent with the Council.

deserve to have their concerns heard and understood. This right under the LGA has been recognised in other regions across New Zealand including in Nelson (where hearings were held in April 2022 on its FDS) and Rotorua (where a hearing is scheduled for August 2023).

25. AV Jennings requests the Council schedules a hearing on the FDS in accordance with the LGA to enable all persons who provided feedback with the opportunity to be heard (as required by section 83(1)(d) and (e) of the LGA).

26. AV Jennings notes that limited changes can be made through the Special Consultative Process without triggering the need to re-consult. Effective pre-engagement is therefore needed. AV Jennings considers that independent hearings are required to consider the evidence.

Residential Capacity

27. AV Jennings considers that the draft FDS significantly overstates the ability of the existing urban environment to meet the housing needs of the Auckland community. The FDS is essentially relying on all of Auckland's future housing stock deliverability to be provided through infill development.

28. The FDS analysis appears to be based on plan-enabled capacity. AV Jennings considers that there is a need to consider "*feasible and reasonably expected to be realised*" capacity by location and type.

29. There are many reasons why existing urban land may not be suitable for redevelopment. This includes the circumstances of the land owners, the existing capital investment on the land that makes redevelopment cost prohibitive, and the lack of suitable infrastructure capacity.

30. Noting the current recession and uncertainty in the housing market, a slowdown in the availability of greenfield land for housing development will result in a significant reduction in general housing stock availability. Whilst the length of recession is unknown, the current FDS will likely contribute to significantly lower housing availability and further delays in housing deliverability, and increased house prices over the short term.

31. Despite the assertion that the MDRS will significantly increase infill housing supply, AV Jennings notes that since 2016 most of urban areas in Auckland have been able to develop 1-3 dwellings as a permitted activity. Despite this opportunity, the share of Auckland's dwelling growth that has been delivered by these smaller permitted activities is considerably less efficient than larger multi-unit developments and greenfield neighbourhoods. AV Jennings has significant doubts that the MDRS will deliver a larger percentage of growth than the present situation.

32. The draft FDS will result in a significant reduction in available housing capacity, with no economic assessment of the overall flow on effects from removing or delaying such large areas of FUZ land. AV Jennings notes that infill and redevelopment housing is generally 20-30% more expensive to build than greenfield housing. The reduction in land supply will place ongoing upward price pressures on houses, as experienced in Auckland since the introduction of the AUP in 2016.

33. The FDS targets urban growth only at Red Hills, Tāmaki; Mangere; Mt Roskill. These are very largely identified as the Kainga Ora redevelopment areas. These locations are too confined and will not provide for the necessary breadth of growth; and too limited in the geographic spread in terms of where people desire to live, and the breadth of lifestyle choice that people seek.

34. AV Jennings notes that the Auckland Council has obtained a further 12-month extension for implementation of the MDRS under Plan Change 78. We understand that the primary reason is the uncertainty of the ability to intensify some existing urban areas due to the recent flooding events. There is significant uncertainty as the extent that these recent weather events will reduce the development capacity in the existing urban areas. AV Jennings considers that it is premature to undertake changes to the FUZ (including staging) until Plan Change 78 has been approved.

35. AV Jennings also notes that the FDS proposes to remove areas of FUZ, but there is no indication that the Council has considered areas outside the FUZ to address this reduction of land.

36. AV Jennings highlight that the capacity being delivered in the existing Ara Hills development area by the underlying consents and private plan change are not captured nor considered in the FDS.

Constraining land supply directly impacts housing affordability

37. 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.

38. 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.

39. It is also important to note that the build cost for 2-3 storey attached housing typologies and 3-5 storey apartments contemplated in brownfields environments under this policy are significantly more than traditional detached 1 & 2 Storey homes commonly found in greenfield developments. Therefore, eliminating greenfield will only lead to negative impacts on housing supply and affordability will only get worse.

40. 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.

41. 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.

Business Land Supply

42. AV Jennings acknowledges that the FDS is not just about delivering homes and housing, but it is also about well-located opportunities for business activity and community facilities, to offer good accessibility to employment and a range of household needs in the urban setting. These are all

relevant matters when considering Auckland's Future Urban Areas. AV Jennings notes that this is particularly relevant in the Auckland context which is a polycentric city which comprises a number of metropolitan centres throughout the Auckland urban environment from the Albany Metropolitan centre in the north to the new Drury Metropolitan centre in the south[3]. Locating employment land close to where people live will help address congestion issues and greenhouse gas emissions.

43. The draft FDS confirms that about 1,400 hectares of additional greenfield land for business activities is required in the long term. This includes approximately 1,000 hectares of land for land extensive business activities and 400 hectares of land enabling business activity and mixed use in centres and business areas. The land will mainly need to be accommodated in the Future Urban Zoned locations and these is an opportunity to ensure that such business land is also aligned with future housing and community infrastructure to provide the opportunity for people to live, work and play in their particular community. The lack of land use integration of both employment land and housing will lead to the reinforcement of cross regional transport demand which will exacerbate travel times, congestion and result in increased greenhouse gas emissions.

44. AV Jennings considers that meaningful intensification of the existing urban area is an unrealistic option for industrial development, particularly for land-extensive floorplates. Provision for most of this growth will need to be in greenfield locations. The capacity alleged in the FDS is based on incorrect assumptions as to vacant land and an unrealistic assumption that brownfield business sites can be redeveloped at very high density. Some of the key assumptions in the draft rely on multi-story industrial development and very high building to land efficiencies. The assumptions are optimistic and need to be tested. The end result appears to be an over estimation of the available business land capacity at present and an under-provision over the 30-year period.

45. There is a significant undersupply of industrial land at the current time, even before further constraints are imposed as proposed in the FDS. Market research indicates that there is a substantial undersupply of large vacant industrial sites, particularly in the north-west of Auckland, yet the draft FDS proposes no new greenfield development in this part of the region until at least 2035+. That provision will fall short of the Council's land supply obligations under the NPS-UD.

46. AV Jennings also notes that the Business assessment is not complete. This is a fundamental part of the evidence base that needs to be completed to inform the FDS. Without an adequate supply of employment land, Auckland risks reducing its competitiveness and business will relocate outside of Auckland.

47. The FDS should be delayed until this work has been completed.

[3] There 11 metropolitan centres across Auckland: Albany (emerging), Takapuna, Westgate (emerging), Henderson, New Lynn, Newmarket, Sylvia Park (emerging), Botany (emerging), Manukau, Papakura and Drury (emerging), plus the City Centre.

FDS Identified Site Constraints and Flooding Matters

48. The FDS cites that there are a number of statutory and non-statutory documents that support the concerns raised in the FDS as reasons why growth in the FUZ should be slowed and further assessments completed. The includes documents like The *National Policy Statement for Freshwater Management 2020* which deals with sensitive hydrological spaces, inclusive of wetlands and streams. Sediment and erosion are controlled by consent conditions and Council's own GD-05 standards. The recent flood events have been identified as one of the reasons *to* prevent greenfield development due to several stated constraints.

49. AV Jennings disagrees with the approach. The existing planning documents already provide a pathway and a consenting framework to address such matters. In any event, the potential for enhanced regulatory methods (i.e., even better stormwater performance requirements) should have been considered as options. It is also noted that the requirement for structure planning and an eventual Plan Change provides more than sufficient controls to ensure that site constraints (including Natural Hazards) are identified and suitably addressed.

50. In AV Jennings experience when developing larger greenfield sites, there is ample opportunity (and land) to masterplan developments to manage natural hazards and stormwater issues and, as noted above, there are already sufficient controls within the Unitary Plans to manage such effects. AV Jennings is not aware of any recently rezoned greenfield areas that failed or suffered undue flooding damage as a result of the recent stormwater effects. On the contrary, it was largely areas of infill housing that experienced the most significant adverse flooding damage.

51. AV Jennings also notes that it is likely that additional qualifying matters, such as flooding, would prevent or delay development under the MRDS until this aspect of development was resolved. The current uncertainty around the final outcomes of Plan Change 78 and the MDRS (including the 'theoretical yield') further highlights the lack on certainty of the ability for the Policy framework to provide suitable housing choice to the Auckland community.

52. AV Jennings has been involved in a significant residential development in Hobsonville Point, Auckland and it is of the view that density done well, designed in an integrated manner from the outset with good modern infrastructure standards, is far superior to ad-hoc and fragmented infill in older, often car-orientated neighbourhoods with very poor infrastructure.

Governmental Uncertainty

53. AV Jennings notes that the National party has signalled that it will likely make the MDRS "optional". There is current significant uncertainty as to whether they will continue to support and deliver the capacity envisaged under the MDRS. Should the approach to the MDRS change Council will be left with a FDS that serves a limited purpose and provides for a watered-down infill approach relying on infill uptake much like we already have under the AUP, but with a diminished ability to bring in greenfield land.

Infrastructure Services and Funding

54. The FDS assumes that only the Council will fund core infrastructure. This is not correct, and on many projects the developer funds and delivers the infrastructure. The infrastructure triggers in

the FDS are unclear and appear to assume that all infrastructure needs to be delivered before rezoning occurs. This is also unrealistic as the private sector will not invest in the absence of certainty about land use outcomes, as it is the approval of land use that enables developers to secure funding for the infrastructure. The Council is very unlikely to be in a position to fund the required infrastructure and it needs to work in partnership with the private sector to deliver the infrastructure and land use outcomes required.

55. AV Jennings considers that there are a wide range of funding mechanisms available for infrastructure delivery which the Council should consider. This includes the use of Crown Infrastructure Partners (CPI). However, the FDS does not consider alternative funding approaches.

56. AV Jennings considers that providing infrastructure in the FUZ integrates suitably sized infrastructure from the beginning. Because it is a 'clean slate', there is an opportunity to design and size infrastrucure within the context, use the land effeciently and maximise development, and the investment that the Council makes. For existing communities on the urban/FUZ interface, greenfield development may enable additional critical mass and additional economic support for their local neighbourhoods.

57. AV Jennings notes that in terms of greenfield areas, on site infrastructure is generally funded by developers. Offsite infrastructure to meet the demands of growth is largely funded in accordance with an approved Developer Contribution Policy or other approved funding framework.

58. AV Jennings considers that the FDS significantly underestimates the costs and feasibility for retrofitting infrastructure into existing brownfield areas. There are also significant issues with the ability for developers to obtain a "rights of entry" to access infrastructure on private land. This issue already frustrates intensification under the current Unitary Plan provisions and it will not be addressed by PC78.

59. There is very little mention of development contributions as a means to resolve funding shortfalls often cited in the FDS, notwithstanding large-scale development proposals almost always (via the Plan Change Process) incorporate transport and infrastructure upgrade triggers as part of any successful rezoning. We can only presume that the Council has no appetite to contribute any funding to future FUZ developments in the short to medium term, hence why this option has been almost entirely discounted from the FDS. Developers have (for some time) successfully shared the cost of greenfield redevelopment in previously identified FUZ areas – through both standard development contributions required under conditions of consent, and/or by infrastructure growth agreements with services providers.

60. AV Jennings consider that where infrastructure investment has occurred, those areas should be prioritised so that a return can be obtained from the funding that has already been invested. For example, Council and its CCOs have invested $181m for the Northern Interceptor bulk wastewater line and North Harbour 2 watermain, both of which are required to service the Whenuapai area. Another example is Drury South.

Conclusion

61. A quality FDS will support economic competitiveness over the next 30 years. To prepare the draft FDS, the NPS-UD requires engagement with the development sector (to identify significant future development opportunities and infrastructure requirements) (clause 3.15).

62. This is needed because developers ultimately implement the FDS – providing for growth in the wrong locations means supply will fall short of demand with flow-on effects for housing affordability and business productivity.

63. The FDS seeks to promote long-term strategic planning by setting out the means by which a local authority intends to achieve a well-functioning urban environment, provide sufficient development capacity over the next 30 years, and integrate planning decisions with infrastructure planning and funding. This is intended to 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.

64. There are significant omissions in the Draft FDS with the exclusion of the existing and future urbanisation occurring at Ara Hills, Upper Orewa.

The submitter's concerns would be addressed if the draft Future Development Strategy was amended in the following way:

- That the current FDS is withdrawn for the reasons set out in the following feedback and the Council engages with the community and key stakeholders to reconsider the approach to the FDS.

- That the existing and future urbanisation already underway at Ara Hills, Upper Orewa providing for approximately 900 dwellings is accurately identified in the FDS.

- That no changes are made to the FUZ (including staging) until Plan Change 78 has been approved.

- The FDS should be delayed until the Business Capacity Assessment has been completed.

- The Council should work with the community and key stakeholders, including the residential development sector, to develop key principles including:

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

  (ii) that land supply will continue to occur with a combination of urban consolidation, greenfield development, and the expansion of satellite townships;

(iii) that growth needs to be serviced by adequate infrastructure, with a range of funding options explored including innovative methods and participation by the private sector (investment and development);

(iv) that 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;

(v) That these principles are applied on an area by area basis to identify the release of land;

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

(vii) enable and support the private sector to deliver the range and quality of urban growth that is good for the community and which the NPS-UD and RPS aspires to achieve;

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

- Any consequential changes where these are required to give effect to the relief outlined above.

The submitter appreciates the opportunity to provide informal feedback on Auckland Council's draft Auckland Future Development Strategy 2023-2053 and thanks the Council staff and elected members for their time in considering the matters that have been raised in this submission.

The submitter would welcome contact from staff in the FDS team if any clarification or further information is required.

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[redacted]

Campbell Brown Planning Limited
For and on behalf of AV Jennings as its duly authorised agent

Date: 30 July 2023

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Future Development Plan 2023 #8565

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?

#8565

Submission from the AQA to Auckland Council on the Auckland Future Development Strategy

July 2023

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing quarrying companies which produce 45 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates and assist in developing a highly skilled workforce within a safe and sustainable work environment.

We would like to thank the Auckland Council for the opportunity to comment on the draft Auckland Future Development Strategy (the draft strategy).

Key Points

- Aggregate is an essential ingredient in the building of infrastructure, roading and housing as well as climate change adaption. Increased supply will be needed to achieve the growth and development of Auckland as anticipated in the draft strategy.
- Aggregate will either need to be produced locally or imported from outside the region at a much higher cost.
- We are concerned that the plan does not address the need for new quarries. For example, the map on page 44 has existing quarries only. Auckland will need new quarries if its growth targets are to be achieved.
- There are already shortages of aggregate in Auckland. There is the risk of increased shortages if sterilisation occurs as residential areas are allowed to expand on to or near potential quarry land.
- In order to future proof Auckland, land for existing and future aggregate extraction activities must be adequately identified and protected from encroachment of non-compatible land uses.

The Importance of Aggregates and Auckland

Aggregate (crushed rock, gravel and sand) is an essential resource for the construction of housing, roading projects and other transport infrastructure. It is used for general construction - in concrete, asphalt, mortar and other building products.

Aggregate is also important for increasing resilience and adapting to extreme weather events and climate change.

Due to the unprecedented levels of construction and infrastructure development activity, aggregate is increasingly in short supply in Auckland as well as other parts of New Zealand.

Not only is there high demand in Auckland, but supply is also constrained. Aggregate deposits are 'location specific' – limited in quantity, location and availability. They can only be sourced from where they are physically located and where the industry is able to access them.

This characteristic means it is important that the location of aggregate resources are identified by councils generally and access is not inadvertently shut off through encroachment of non-compatible land uses.

The Auckland Future Development Strategy

The draft Auckland Future Development Strategy aims to influence where and how growth occurs in the region over the next 30 years.

We are concerned that insufficient attention has been given in the draft strategy to aggregates in achieving this growth and to ensuring that land for future aggregate extraction activities is available. Auckland needs new quarries.

According to the draft strategy, Auckland's population is expected to grow by around 520,800 people over the next 30 years to a total of 2,230,800. Households are forecast to grow by 34% or just under 200,000 net additional dwellings.

At 250 tonnes per dwelling this equates to an extra 50 million tonnes of aggregate and sand that will be needed over the next 30 years for housing alone. This is the equivalent of just under 1.7 million additional tonnes per annum. Auckland currently produces 7.9 million tonnes and has to import the rest of its demand from other regions in New Zealand particularly Waikato but this isn't sustainable. Because quarried products are high volume this contributes to pressures on roads, adds to congestion, increases emissions and adds to costs to the consumer – the cost of aggregate doubles when transported 30 kilometres from its source. Auckland already imports one truckload in six from outside the region.

In terms of emissions, transport accounts for 40% of Auckland's emissions. 86% of these come from road transport. The draft strategy acknowledges that key to reducing emissions is reducing the amount of vehicle kilometres travelled (VKT). The

location of quarries will have an impact on this.

Auckland will clearly need new quarries if its growth targets are to be achieved so it is of great concern that the draft strategy does not seem to allow for them. For example, the map on page 44 has existing quarries only, suggesting no new sites are planned.

In the meantime, Auckland's growing population means areas of aggregate supply and appropriate quarrying land are at risk of sterilisation as residential areas and competing industrial land uses expand. Building too close to quarries brings reverse sensitivity issues due to the nature of extractive industry operations including noise, vibration and dust. Residential and industrial development areas should ideally be as close as reasonable to identified areas of aggregate but not too close.

We are concerned about the increasing difficulty to get quarries approved in Auckland as pressure from affected communities grow. A case in point is McCallum's sand dredging operation at Pakiri which was initially declined by an Auckland Council hearings panel. Without sand from Pakiri, which is currently barged into Auckland, around 1,000 extra truck movements would be needed on Auckland motorways every month.

Areas of Aggregate Opportunity

In order to future proof Auckland, land for existing and future aggregate extraction activities must be adequately identified and protected from encroachment of non-compatible land uses. Steps should be taken to achieve this and included in the Implementation actions set out in appendix 12 of the draft strategy.

GNS Science has almost completed a modelling study to highlight areas of aggregate opportunity in the Auckland region. The project was commissioned by the New Zealand Infrastructure Commission and has used geological, land use, environmental and statistical data to identify areas of the region where the best opportunities are for aggregate resources.

The study covers the land area from Whangārei in the north to Hamilton in the south, and as far east as Whakatāne to encompass the regions of future development and resource sources for Auckland City. So far hundreds of sites have been identified as having an aggregate opportunity in the region.

In the meantime, GNS Science has done some initial, high level work outlining where the areas of hard rock potential for Auckland are. This is shown in the appendix of this submission.

We are particularly concerned that future urban and business areas, both industrial and residential, could be in, and near, areas of high aggregate potential. This development could sterilise future access to aggregate if care is not taken.

Highly Productive Land

The draft strategy makes several references to highly productive land in the context of highly productive soil for agriculture identifying the need to protect it from sterilisation and residential expansion. It should be noted that land supporting quarrying development is also highly productive – in fact it is more productive than agricultural land – quarrying generates many times more revenue per hectare than dairy, beef/lamb or horticulture.

Where the draft strategy emphasises that productive farmland should be protected it needs to do the same for productive land incorporating aggregate and other mineral resources.

We note that quarrying is part of the primary production definition in the National Planning Standards which supports this argument.

Climate Change

We strongly support Principle 2 of the draft strategy – Adapt to the principles of climate change.

It is important to note the role of aggregates in strengthening resilience to natural hazards and climate change. Aggregates such as armour rock, for example, are needed for flood protection and to adapt to sea level rise and coastal erosion through strengthening of sea walls etc. They will be needed to repair damage to coastal infrastructure and to make infrastructure generally more resilient to greater intensity storms and extreme weather events.

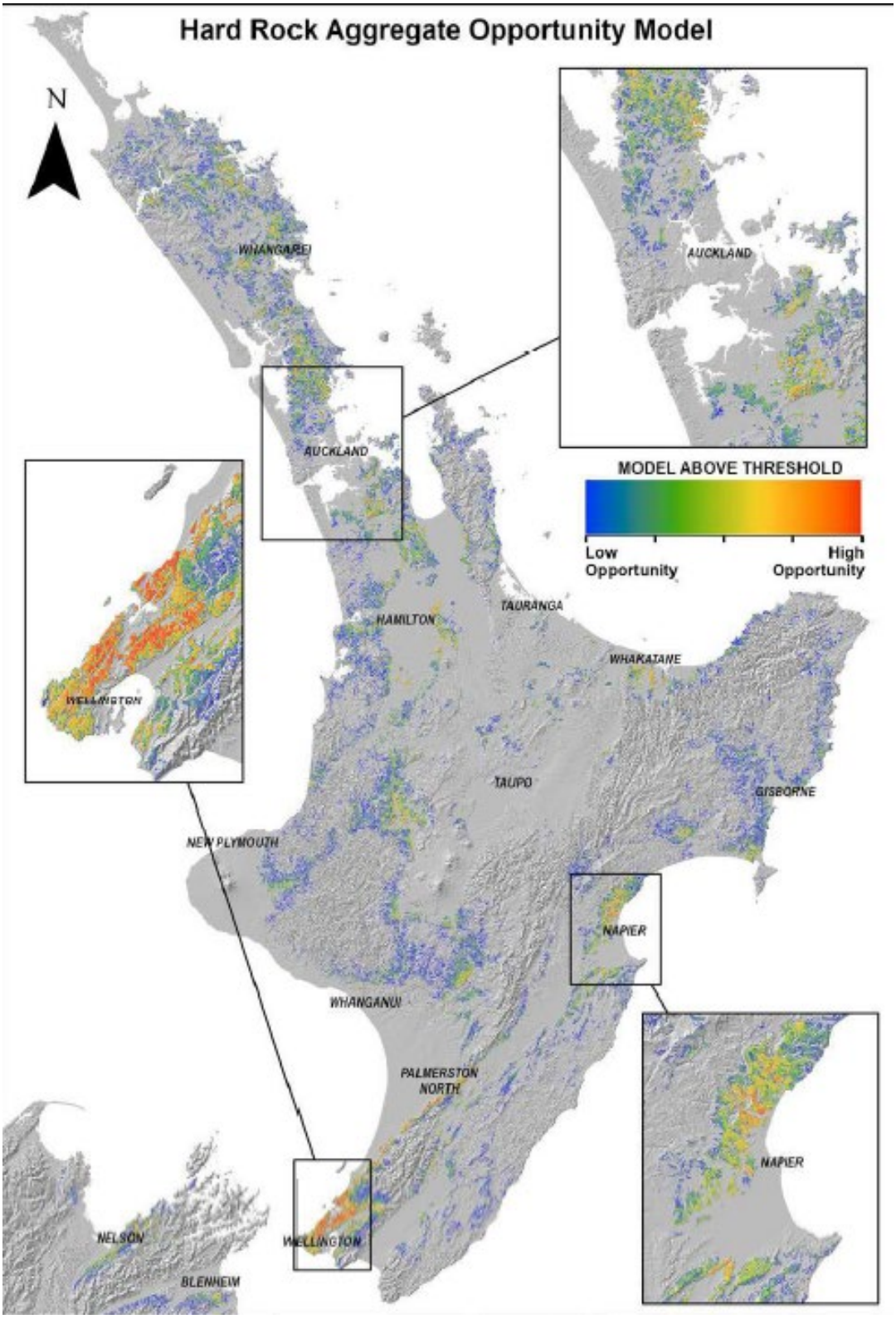
Aggregates have had an essential role recently as part of the post cyclone and flood rebuild.

Quarries are not Permanent

Note that quarries have a finite life, they are not permanent. Once the rock is extracted the land is returned to the community and can be used in a variety of ways. It is not inconceivable that housing and other developments can occur on and around former quarry land that has had the rock extracted. An example of this in East Auckland is Stonefields, which is a suburb built on a former quarry.

[redacted]
Chief Executive Officer
Aggregate and Quarry Association
[redacted]

Appendix 1


Hard Rock Aggregate Opportunity Model
N
WHANGAREI
AUCKLAND
AUCKLAND
MODEL ABOVE THRESHOLD
Low Opportunity
High Opportunity
HAMILTON
TAURANGA
WHAKATANE
WELLINGTON
TAUPO
GISBORNE
NEW PLYMOUTH
NAPIER
WHANGANUI
PALMERSTON NORTH
NAPIER
NELSON
WELLINGTON
BLENHEIM

Future Development Plan 2023 #8566

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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?

Please refer to the attachment

Future Development Plan 2023 #8573

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

Tell us why

Other feedback

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

SUBMISSION ON AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023 - 2053

To: Auckland City Council (*Council*)

Name of submitter: Ryman Healthcare Limited (*Ryman*)

Introduction

1 This is a submission on Council's draft Auckland Future Development Strategy (*Draft Strategy*).

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

3 Ryman supports in full the Retirement Villages Association of New Zealand Incorporated (*RVA*) submission on the Draft Strategy. This submission provides additional context to Ryman's villages and its interest in the Draft Strategy.

4 The submission covers:

4.1 An introduction to Ryman, its villages and its residents; and

4.2 Ryman's position on the Draft Strategy.

Ryman's approach

5 Ryman is considered to be a pioneer in many aspects of the healthcare industry – including retirement village design, standards of care, and staff education. It believes that a quality site, living environment, amenities and the best care maximises the quality of life for our residents. Ryman is passionately committed to providing the best environment and care for our residents. Ryman is not a developer. It is a resident-focused operator of retirement villages. Ryman has a long term interest in its villages and its residents.

The ageing demographic

6 Auckland City's growing ageing population and the increasing demand for retirement villages is addressed in the RVA's submission on the Draft Strategy, and that is adopted by Ryman.

7 Ryman's own research confirms that good quality housing and sophisticated care for the older population is significantly undersupplied in many parts of the country, including Auckland. Auckland's ageing population is facing a significant shortage in appropriate accommodation and care options, which allow them to "age in place" as their health and lifestyle requirements change over time. This is because appropriate sites in good locations are incredibly scarce.

Ryman's scale in Auckland's retirement market

8 Ryman is the largest provider of retirement village accommodation in New Zealand. It currently has 38 operational retirement villages throughout New Zealand providing homes for more than 13,200 elderly residents.

9 Ryman has 13 retirement villages currently operating or at some stage of design or construction in Auckland – located in Orewa, Saint Heliers, Remuera, Howick, Birkenhead, Greenlane, Pukekohe, Takapuna, Kohimarama, Henderson, Hillsborough, Hobsonville and Narrowneck. These villages are located in a mix of existing and new residential areas.

10 Ryman is also in the process of obtaining consents for a further village at 250 Hingaia Road, Karaka. The proposed village will offer living options to suit everyone - including independent townhouses and apartments and a full range of care options, including assisted-living suites, rest home, hospital and specialist dementia care. The village will comprise around 206 new retirement units and 140 aged care units, and will house in the order of 408 residents.

11 In that sense, Ryman builds a substantial portion of all new retirement village units. We expect to continue to increase our proportion of Auckland's new build retirement villages over time.

Ryman's residents

12 All of Ryman's residents – both retirement and aged care residents – are much less active and mobile than the 65+ population generally as well as the wider population. Ryman's retirement residents are generally early 80s on move-in and its aged care residents are mid-late 80s on move-in. Across all of Ryman's villages, the average age of retirement residents is 82.1 years and the average age of aged care residents is 86.7 years.

Ryman villages' amenities and layout needs

13 To provide for the specific needs of its residents, Ryman provides extensive on-site community amenities, including entertainment activities, recreational amenities, small shops, bar and restaurant amenities, communal sitting areas, and large, attractively landscaped areas.

14 Because of the comprehensive care nature of Ryman's villages, all of the communal amenities and care rooms need to be located in the Village Centre to allow for safe and convenient access between these areas. This operational requirement results in a density and layout that differs from a typical residential development. However, Ryman's retirement villages are integrated developments, which often creates opportunities to achieve higher quality residential outcomes compared to typical residential developments.

15 Because of these functional and operational needs, sites appropriate for retirement villages within existing residential areas are extremely rare. Ryman accordingly looks for sites in mixed use/commercial and greenfields locations, as well as well-established residential areas.

Ryman's position on the Draft Strategy

16 Ryman adopts the RVA's submission on the Draft Strategy. In addition, Ryman wishes to emphasise that the Draft Strategy will have a significant impact on the provision of housing and care for Auckland City's growing ageing population.

Decisions sought

17 Ryman seeks the relief sought by the RVA in its submission on the Draft Strategy.

18 Ryman wishes to be heard in support of this submission.

19 If others make a similar submission, Ryman will consider presenting a joint case with them at a hearing.

[redacted]

Future Development Plan 2023 #8578

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Your feedback

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Tell us why

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Tell us why

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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?

#8578

Auckland Future Development Strategy 2023 - 2053

Submission from the Retirement Villages Association of New Zealand

31 July 2023

AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023-2053

RETIREMENT VILLAGES ASSOCIATION OF NEW ZEALAND INCORPORATED

To: Auckland City Council (*Council*)

INTRODUCTION

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

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

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

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

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

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

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

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

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

SUBMISSION CONTENT

6 This submission covers:

6.1 An introduction to the RVA;

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

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

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

6.5 Conclusions.

THE RVA

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

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

IMPORTANCE OF RETIREMENT VILLAGES IN ADDRESSING THE HOUSING CRISIS

Summary

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

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

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

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

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

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

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

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

New Zealand's ageing population

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

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

14.1 Lower fertility;

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

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

[4] GPS-HUD, page 10.

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

[6] Ibid, page 32.

[7] Ibid, page 52.

[8] Ibid, page 6.

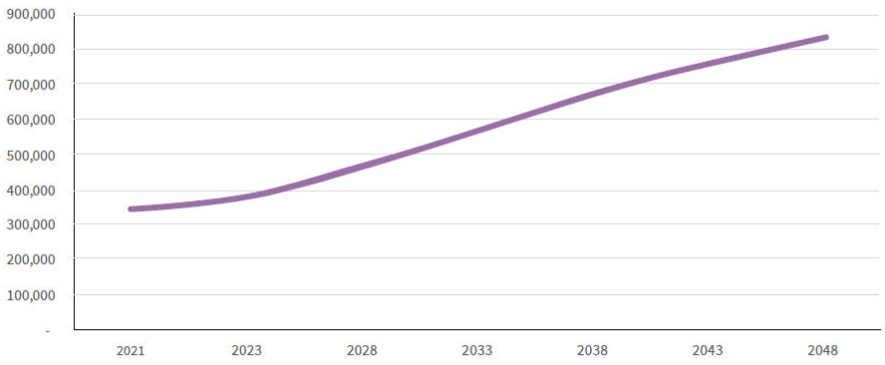
[9] Ibid.

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

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

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

Figure 2 Total NZ 75+ population 2021-2048



Source: JLL Research; Statistics New Zealand

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

Auckland City context

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

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

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

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

12 Ibid.

13 Ibid.

The retirement housing and care crisis

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

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

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

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

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

Addressing the retirement housing and care crisis

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

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

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

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

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

[17] Ibid, pages 3 and 23.

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

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

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

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

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

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

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

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

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

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

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

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

THE RVA'S COMMENTS ON THE DRAFT STRATEGY

Summary

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

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

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

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

The Draft Strategy does not comply with the NPSUD

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

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

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

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

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

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

PC78 and infrastructure constraints

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

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

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

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

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

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

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

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

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[20] NPSUD, cl 3.14.

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

[22] Ibid.

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

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

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

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

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

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

Importance of enabling development in urban and urban fringe areas

Size requirements

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

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

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

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

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

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

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

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

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

Location requirements and ageing in place

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

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

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

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

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

[27] Ibid.

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

[29] Ibid.

Relief sought

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

57.1 the Draft Strategy's consultation period under section 83 of the Local Government Act 2002 be extended to allow further work to be undertaken by the Council to identify areas appropriate for intensification;

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

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

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

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

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

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

CONCLUSION

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

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

[redacted]

Executive Director

Contact details:

Retirement Villages Association

[redacted]

Future Development Plan 2023 #8579

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

The above assumptions are not based on factual evidence. Evidence indicates that greenfield land may be less costly to develop and can be more efficient in terms of responding to the effects of climate change; providing for a well-functioning urban environment; delivering the required infrastructure and providing choices for where and how people live and work.
The FDS should strike a balance between providing for urban consolida on and greenfield development to contribute to housing supply, affordability and choice.

Accessible local centres

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

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

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

Tell us why

There Future Urban land in question is located close near to existing employment areas, educational facilities (schools and early learning centres), open spaces and services within the Huapai and Kumeu town centre areas.
In any event, proximity to workplaces, services, facilities and shops are matters that are typically addressed in detail in plan changes. There is already a clear policy framework in the Unitary Plan and the NPS UD that requires these aspects to be thoroughly considered in any proposed re-zoning.

Avoiding hazards

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

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

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

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

Tell us why

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

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

Resilient infrastructure

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

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

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

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

Tell us why

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

Other feedback

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

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

There is no factual or evidential basis to support the approach set out in the draft FDS. The draft FDS will create uncertainty and reduce opportunities to create well-functioning urban environments that will have longevity in terms of quality now and into the future.

The submitter seeks that the FDS be amended to:

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

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

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

28 July 2023

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

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY

This Feedback details the submitter, the affected property and responds to the provisions of the FDS in high-level and specific ways including addressing the matters that Auckland Council has invited specific feedback on the Have Your Say webpage.

Submitter Details

This feedback is provided on behalf of: [redacted]

Property or Interest Affected by the FDS: [redacted]

Address for Service

Name: The Planning Collective
[redacted]

Email Address: [redacted]

Phone: [redacted]

Property Details

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

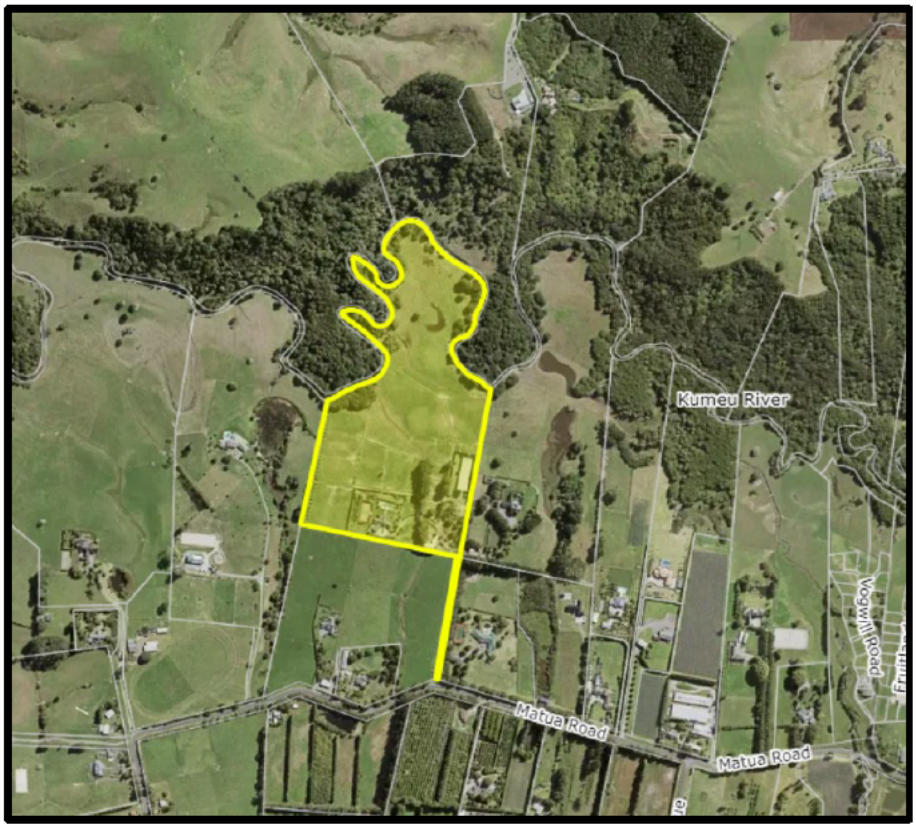


Figure 1 - Aerial image of [redacted] (source: Grip Maps, July 2023)

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

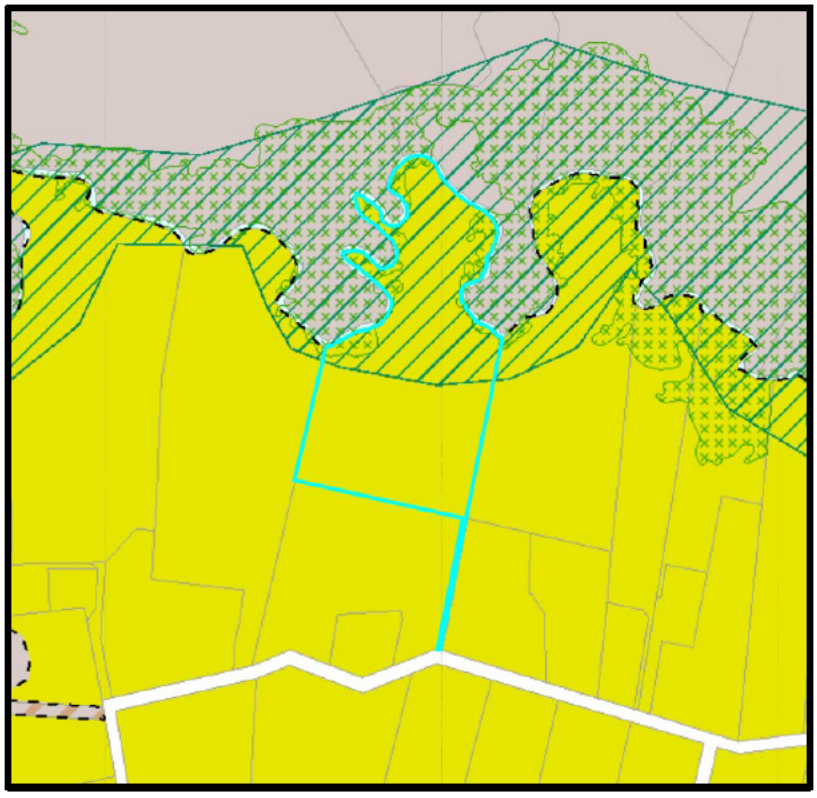


Figure 2 - AUP-OP Maps (source: AUP-OP Maps, July 2023)

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

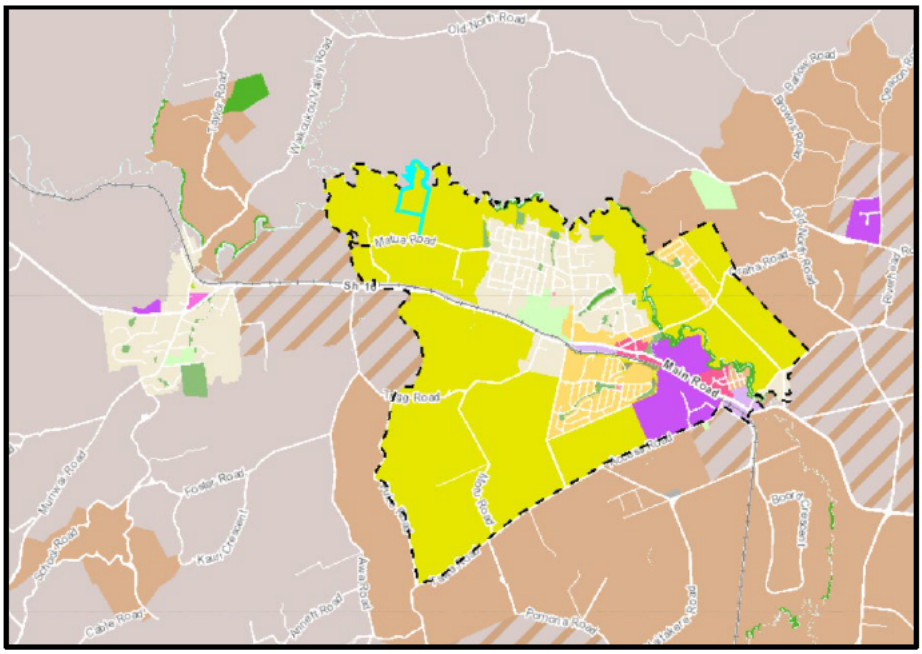


Figure 3 - AUP-OP Maps (source: AUP-OP Maps, July 2023)

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

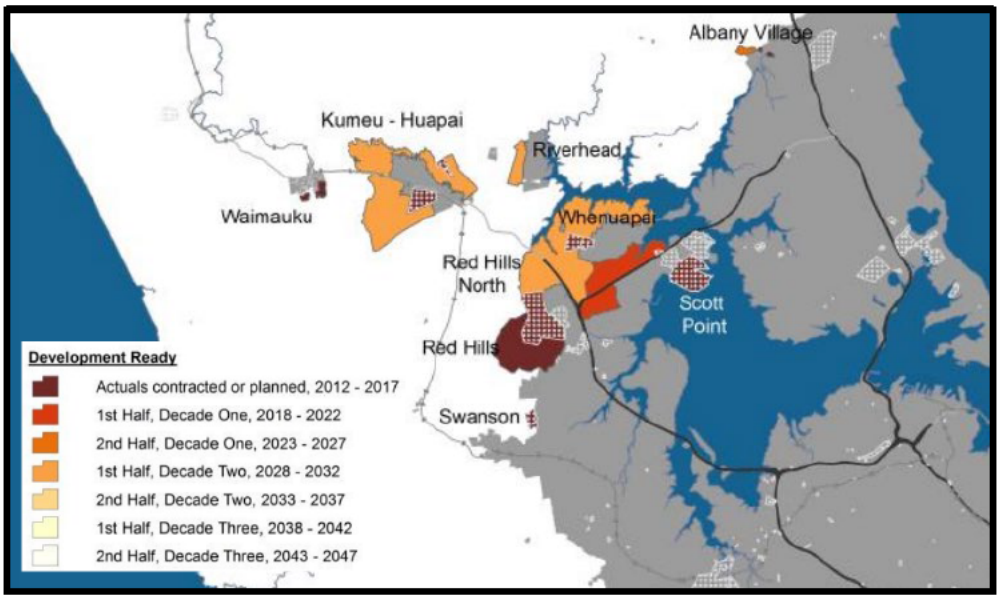


Figure 4 – Future Urban Land Supply Strategy for Kumeu-Huapai area 2017

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

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

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

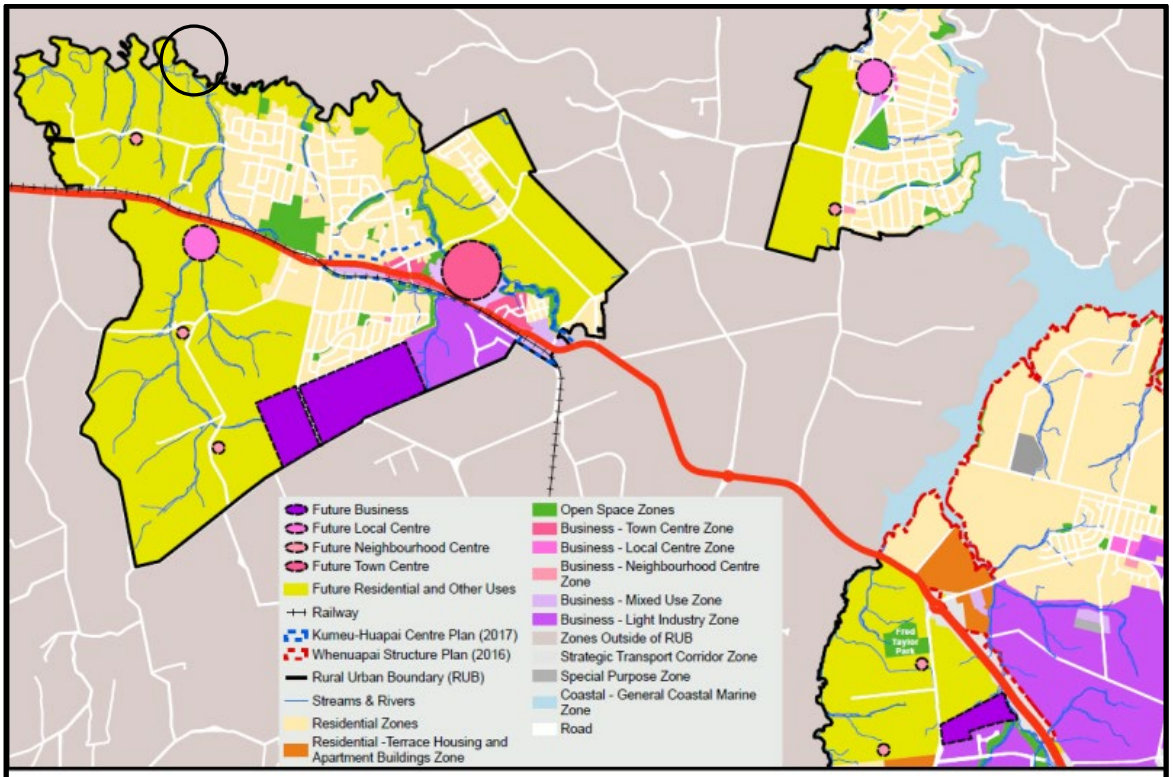


Figure 5 – Spatial Land Use Strategy for North-West Auckland

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

High-Level Feedback

The National Policy Statement – Urban Development 2020 (updated May 2022) ("**NPS-UD**") requires every Tier 1 and 2 Local Authority to prepare a Future Development Strategy ("**FDS**"). Subpart 4 of the NPS-UD states that an FDS must be prepared and made publicly available *"…every 6 years and in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority".*

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

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

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:

(a) to promote long-term strategic planning by setting out how a local authority intends to:

(i) achieve well-functioning urban environments in its existing and future urban areas; and

(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) Every FDS must spatially identify:

(a) the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3; and

(b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and

(c) any constraints on development.

(3) Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.

Well-functioning urban environment has the meaning set out in Policy 1 of the NPS-UD:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households; and

(ii) enable Māori to express their cultural traditions and norms; and

(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

Clause 3.14 states the FDS must be informed by:

(a) the most recent and applicable Housing and Business Development Capacity Assessment ("HBA"),
(b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS
(c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans
(d) Māori, and in particular tangata whenua, values and aspirations for urban development
(e) feedback received through the consultation and engagement required by clause 3.15
(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement
(g) any other relevant national policy required by, or issued under, legislation.

Clause 3.17 requires every local authority to have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

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

It is apparent that Council has initiated a kneejerk about-face in respect of greenfield developments and a freeze-control to the existing urban form and growth pattern. This has been misinformed by its own manufactured financial constraints, outdated Housing and Business Development Capacity Assessment ("HBA") and preference for ad-hoc infill development which in turn only delivers myopic, piecemeal infrastructure solutions or 'bandages'. This leaves our infrastructure (and its ability to support urban development) in a constant state of deficit/catch-up, rather than being efficiently and effectively "future-proofed" to accommodate long-term growth.

In reality, the uptake of development capacity will mostly be realised by the private sector and not Auckland Council. This has been clearly demonstrated over the last 7-years since the Unitary Plan became operative. Auckland Council has notified one plan change (Whenuapai), which was so defective that it eventually had to be withdrawn. This means the growth demand will, in reality, be met by the actions of developers who will deliver and/or support the majority of prosperous, inclusive, and vibrant communities, and put in the legal mechanisms and physical infrastructure to realise greenhouse gas emission reductions. Developers pay the upfront costs for service networks and now more commonly transmission networks (as a minimum) and pay for development contributions and infrastructure growth charges.

The submitter requests that the FDS recognises and reinforces the significant role of future urban areas (for Auckland, the "Future Urban Zone") make in terms of their ability to deliver affordable urban development and create a variety of housing and living environments as well as integrated employment areas. But at the same time, the FDS needs to recognise it is not realistic for the growth demand to be met and infrastructure issues to be resolved if greenfield development is constrained, at least to the

extent proposed in the FDS. The FDS needs to provide a pathway for growth outside the current urban form, where it can deliver better-functioning communities (rural and urban), ecosystems and more resilient interconnecting infrastructure networks.

Consultation and Engagement:

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

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

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

Given the above, Auckland Council must take into account feedback provided by land developers, and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS. This includes decision-makers from land developers in person in relation to their submissions as part of the Special Consultative Procedure. The purpose being (as set out above) to achieve well-functioning urban environments in existing and future urban areas now and over the long term (30 years).

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

Site Specific Feedback

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

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

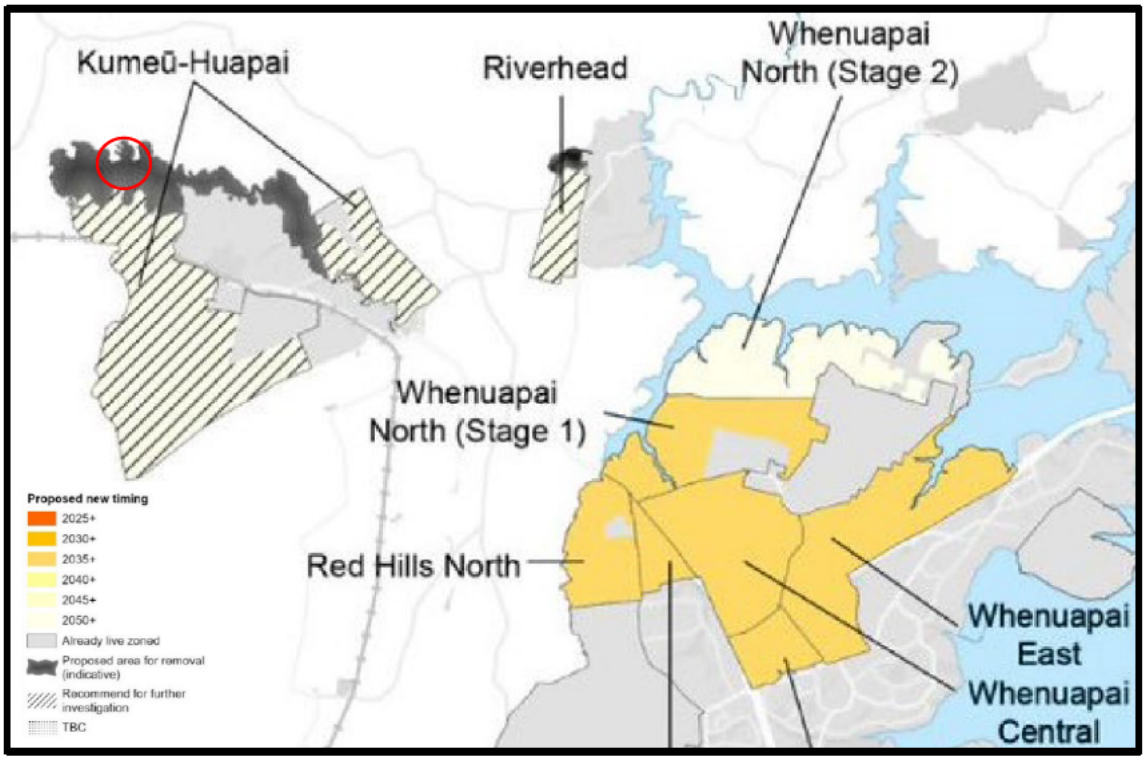


Figure 6 - FDS Proposed timing and approach for Kumeu-Huapai. Red circle identifies location of submitter land at 314 Matua Road, Huapai

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

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

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

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

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

Infrastructure

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

Natural hazards

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

Emissions/VKT reduction

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

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

Significant Natural Hazard Constraints:

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

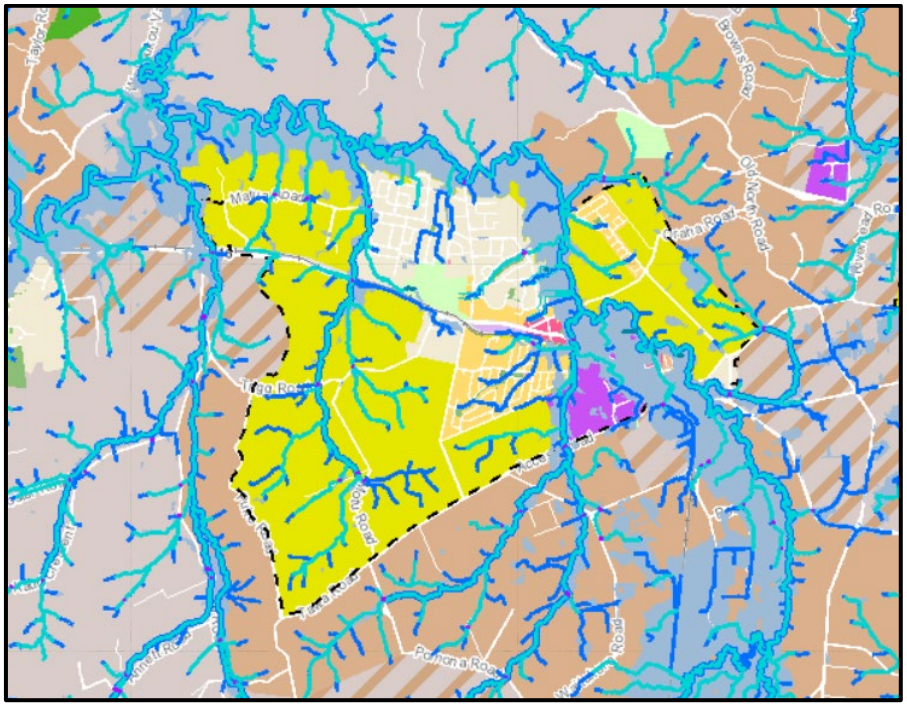


Figure 7 - AUP-OP Maps with Catchment and Hydrology layer overlaid (source: Grip Maps, July 2023)

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

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

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

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

Infrastructure:

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

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

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

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

Emissions/VKT reduction:

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

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

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

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

Specific Feedback in Response to Have Your Say

Focusing Growth:

Focusing growth

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

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

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

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

The above assumptions are not based on factual evidence. Evidence indicates that greenfield land may be less costly to develop and can be more efficient in terms of responding to the effects of climate change; providing for a well-functioning urban environment; delivering the required infrastructure and providing choices for where and how people live and work.

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

Accessible Local Centres:

Accessible local centres

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

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

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

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

In any event, proximity to workplaces, services, facilities and shops are matters that are typically addressed in detail in plan changes. There is already a clear policy framework in the Unitary Plan and the NPS UD that requires these aspects to be thoroughly considered in any proposed re-zoning.

Avoiding Hazards:

Avoiding hazards

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

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

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

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

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

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

Resilient Infrastructure:

Resilient infrastructure

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

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

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

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

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

Conclusions and Outcomes Sought

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

There is no factual or evidential basis to support the approach set out in the draft FDS. The draft FDS will create uncertainty and reduce opportunities to create well-functioning urban environments that will have longevity in terms of quality now and into the future.

The submitter seeks that the FDS be amended to:

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

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

Yours sincerely



End of Report

Future Development Plan 2023 #8582

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?

#8582

Campaign For Better Transport

31 July 2023

Auckland Council
AUCKLAND

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

Dear Sir/Madam

FUTURE DEVELOPMENT STRATEGY

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

Progress to Date

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

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

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

Trains to Huapai

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

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

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

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

Light Rail for the Isthmus

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

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

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

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

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

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

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

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

Considerations Beyond Auckland and Future Proofing

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

Campaign For Better Transport

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

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

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

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

Yours faithfully
The Campaign for Better Transport Incorporated



Jodi Johnston (Mr.)
Convenor

Future Development Strategy

Campaign For Better Transport

Overall view

- The Future Development Strategy is predictable

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

Slow Progress on Public Transport

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

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

Trains to Huapai

- From page 93 of the Final Consultation Document

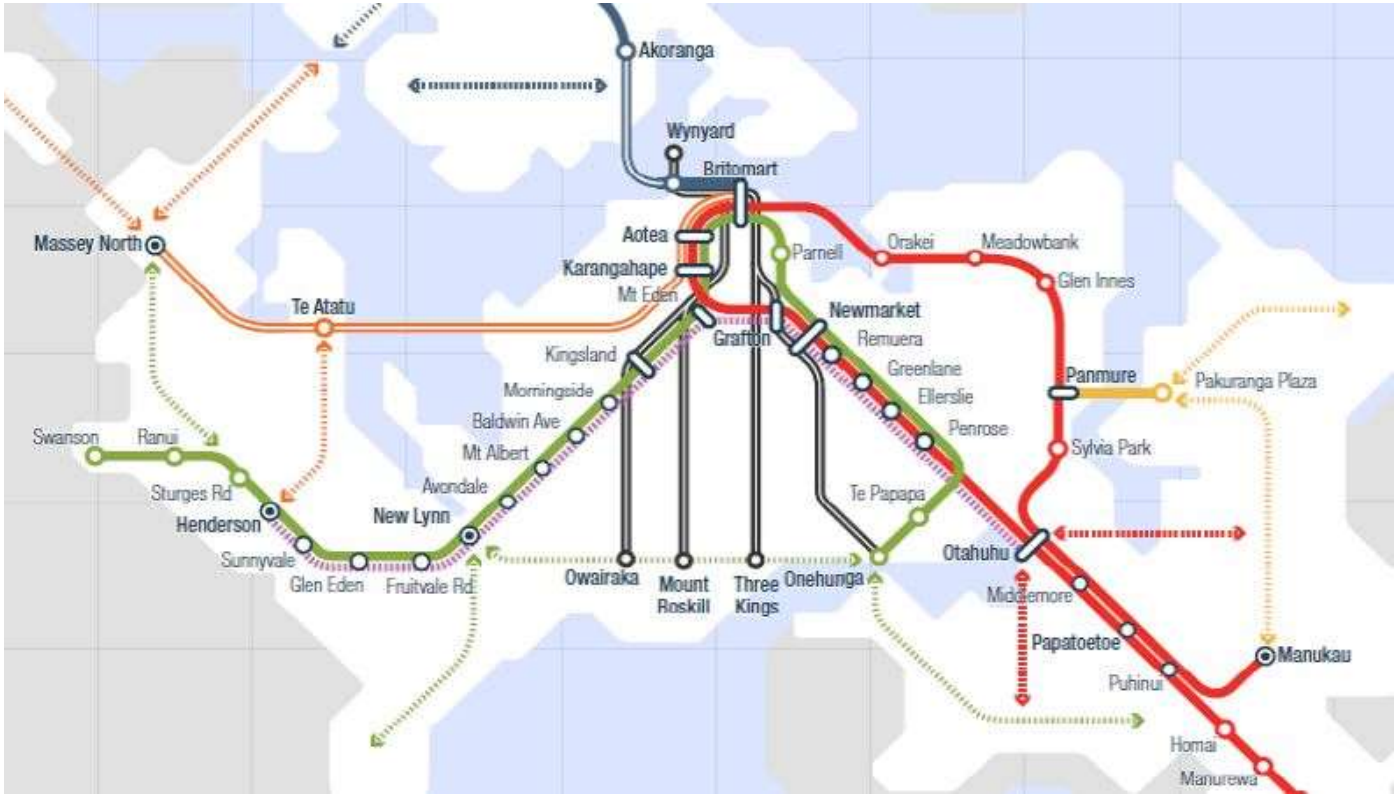
  "Potential for higher VKT and CO2 emissions than other FUAs due to Kumeū-Huapai-Riverhead FUA being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs."

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

Light Rail for the Isthmus

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

Light Rail for the Isthmus



Considerations Beyond Auckland

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

Future Proofing

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

Get on and do it

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

Campaign For Better Transport

www.bettertransport.org.nz

www.facebook.com/groups/CBTNZ/

convenor@bettertransport.org.nz

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