Future Development Strategy

Local Board Not Supplied

WRITTEN FEEDBACK
Volume 4

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

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

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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.

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 #8544

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Your feedback

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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 COUNCIL'S PROPOSED FUTURE DEVELOPMENT STRATEGY

To: Auckland Council ("**the Council**")

Submitter Name: Guping Trust **("the submitter")**

1. INTRODUCTION

1.1. This submission relates to Auckland Council's proposed Future Development Strategy (**FDS**) and specifically to the indicative timing for development ready 'live zoning' of Future Urban Zoned (**FUZ**) land at Clark's Beach.

1.2. The submitter owns land at [redacted] Clarks Beach Road in Clarks Beach as shown in Figure 1 below.



Figure 1: Site aerial

1.3. The subject land is zoned Future Urban Zone under the AUP, with adjacent land at [redacted] and [redacted] Stevenson Road, [redacted] Clarks Beach Road and a number of properties at Globe Road also zoned FUZ. The full extent of the FUZ land is shown in Figure 2 overleaf.

1.4. This land is located within the "Clarks Beach 2" Future Urban zone land area as indicated within the Auckland Council Future Urban Land Supply Strategy (FULSS). In the FULSS, the subject land is land timetabled for live zoning between 2023 and 2027.

1.5. The Clarks Beach Waterfront Estate land to the north-east is zoned Mixed Housing Suburban with the Clarks Beach Precinct rules allowing some Mixed Housing urban scale development (three levels) on parts. The existing traditional residential development in the area is zoned

Residential Single House. The Golf Course and reserve is Open Space Sport and Active Recreation with the coastal parts zoned Open Space Informal Recreation. Land further south and west of the subject land is zoned Rural Coastal and Mixed Rural. The zoning pattern is shown in Figure 2 below.

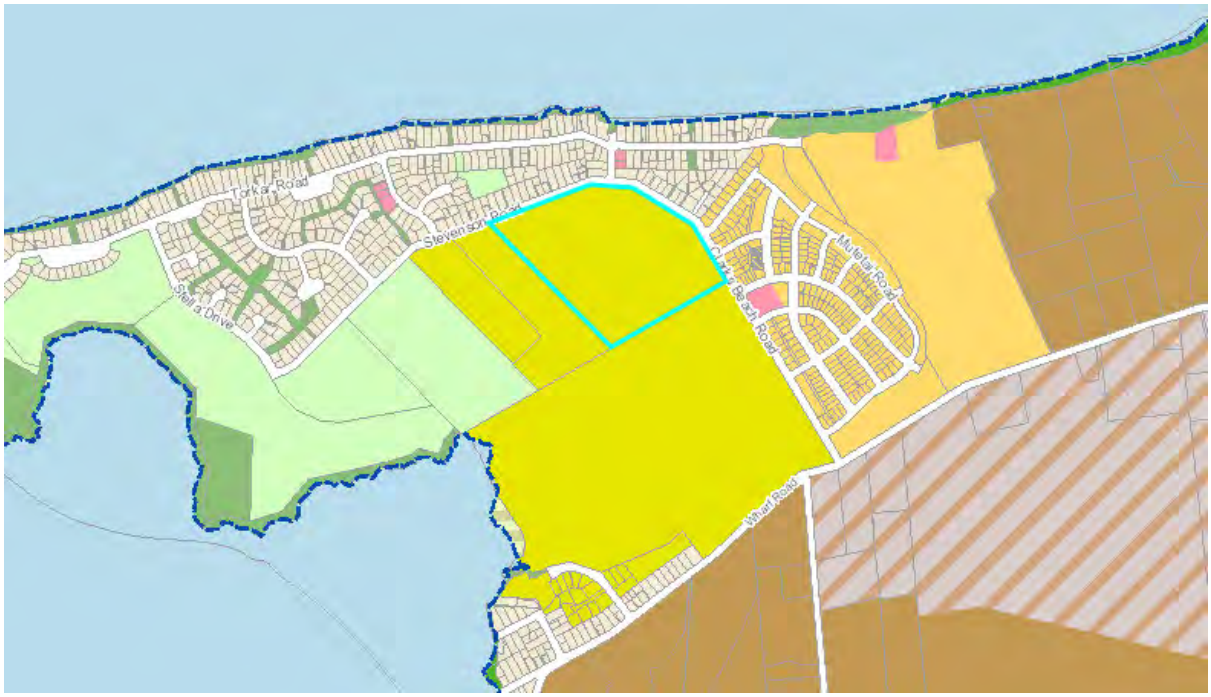


Figure 2 – AUP zoning map

1.6. The submitter is directly affected by the subject matter and does not relate to trade competition or the effects of trade competition.

2. SCOPE OF SUBMISSION

2.1. The submission relates to the indicative timing of rezoning of the property from Future Urban to a development ready live urban zone as shown in Table 3 of Appendix 8 in the FDS as well as Figure 46.

3. NATURE OF SUBMISSION

3.1. The submitter opposes the new timing / proposed delay in development ready live zoning indicated in Table 3 within Appendix 8 to the FDS. The FDS indicates a revised timing of 2030+ for the development ready live zoning/rezoning of this Future Urban zoned land.

3.2. The submitter seeks that the indicative timing be revised to match the indicated provision of the required wastewater treatment infrastructure (2026).

4. REASONS FOR SUBMISSION

4.1. In the FULSS, the subject land is located within the Clarks Beach 2 area with the land timetabled for live zoning between 2023 and 2027.

4.2. The Unitary Plan requires that before any future urban zone is zoned as being ready for urban development, a structure plan will be completed. The FULSS notes that structure plans are an important method for establishing the pattern of land use and the transport and services network within a defined area. They provide a detailed examination of the opportunities and constraints relating to the land including its suitability for various activities, infrastructure provision, geotechnical issues and natural hazards. The Structure Plan then informs the preparation of either Council or private plan changes to the AUP to live zone the land in line with the Structure Plan.

4.3. In this case, the Auckland Council has not prepared a structure plan for the Clarks Beach Future Urban zoned land, and it is understood that there is no current plan for Council to prepare one. It is understood that this is due to a range of factors including the Covid 19 pandemic, planning changes because of the Government's National Policy Statement on Urban Development, other major plan changes and staff shortages. As a result, it will fall to the landowners in the area to prepare a Structure Plan/s for the area in advance of rezoning via private plan change applications.

4.4. From an initial high-level review, there appears to be limited aspects which would prevent the land being brought forward for urban residential development. The land is reasonably flat and forms a logical extension to the urban area of Clarks Beach. The site has good road frontage and access and is large enough to be able to accommodate onsite stormwater infrastructure such as ponds as well as riparian margins where necessary. The land hydrology and potential presence of wetlands requires assessment but does not appear fatal to the achievement of urban rezoning.

4.5. The primary impediment to urban rezoning appears to the availability of reticulated wastewater services. The South-west Wastewater Upgrade project is being undertaken by Watercare[1] which proposes a new Wastewater Treatment Plant (WWTP) which will provide additional wastewater capacity for Clarks Beach as well as surrounding areas, including Waiuku, Glenbrook Beach and Kingseat. This project has been through various technical assessments and site selection processes with the most recent update confirming the new site

[1] https://www.watercare.co.nz/About-us/Projects-around-Auckland/South-west-wastewater-servicing

for the WWTP had been selected ([redacted] Glenbrook Road). It is understood that a Notice of Requirement is to be submitted in August 2023.

4.6. Watercare have previously indicated that the new plant is to be operational by June 2026, so this would appear to be most logical timing for rezoning as it seems that is when additional large-scale development of the subject land would be able to be serviced in terms of wastewater.

4.7. Council's own evidence report for the future urban areas[2] notes that there is '*minimal delay anticipated in providing infrastructure to service growth in Clarks Beach*,' but then goes on to note that sequencing is delayed for infrastructure reasons which does not make sense.

4.8. The submitter therefore seeks that the timing indicated for rezoning the Clarks Beach Future Urban Zoned land within the Future Development Strategy should be 2026 onwards, not 2030 onwards as currently indicated. This will provide certainty to support decisions to proceed with structure planning for the land.

5. SPECIFIC RELIEF SOUGHT

5.1. The submitter therefore seeks that the Future Development Strategy show the timeframe for development ready rezoning of the Clarks Beach 2 FUZ land as 2026 which would ensure consistency with the indicated timing for delivery of wastewater infrastructure to service additional development in this area.

5.2. The submitter also seeks such further or other consequential relief as may be necessary to fully give effect to the relief sought in this submission.

6. REASONS FOR RELIEF SOUGHT

6.1. The reasons for the relief sought are to ensure that the FDS:

a. will give effect to the objectives and policies of the NPS-UD;

b. will contribute to well-functioning urban environments;

c. is consistent with the sustainable management of natural and physical resources and the purpose and principles of the RMA;

[2] Auckland Future Development Strategy 2023-2053. Future urban areas evidence report – for consultation – page 62

d. Will meet the reasonably foreseeable needs of future generations;

e. Will satisfy the requirements of section 32 of the RMA; and

f. Is consistent with sound resource management practice.

6.2. The revised timing of rezoning of the land to 2026 is considered to:

- promote sustainable management of resources and to help achieve the purpose of the Resource Management Act 1991 (RMA);
- support the intended outcomes envisaged by the NPS-UD;
- enable the social and economic wellbeing of the community in Auckland Region; and
- represent an appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.

7. OTHER MATTERS

7.1. The submitter could not gain an advantage in trade competition through its submission.

7.2. The submitter wishes to be heard in support of its submission and will consider presenting a joint case with other who may make a similar submission.

Date: 27 July 2023

Signature [redacted]

[redacted] on behalf of the submitter

Submitter Name: Guping Trust

Contact Person: [redacted]

Address for Service: Guping Trust
C/- Mt Hobson Group
PO Box 37964
Parnell
Auckland 1151

Telephone: [redacted]

Email: [redacted]

Future Development Plan 2023 #8546

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SUBMISSION ON AUCKLAND COUNCIL FUTURE DEVELOPMENT STRATEGY

31 July 2023

To: Auckland Council

Name of Submitter: **Russell Property Group**

This is a submission on the Consultation Draft of the Auckland Future Development Strategy 2023-2053 (**FDS**).

The submitter has a diverse portfolio of property interests throughout Auckland and New Zealand. The submitter's investments include significant vertical buildings and projects within Auckland's existing residential zones. It is therefore in support of intensification but not at the exclusion of greenfields opportunities. The submitter is passionate about Auckland and agrees there is a need for a well thought through development strategy, which considers requirements on Council. However, it also firmly believes that well master planned greenfields developments are essential for Auckland's future and **must** be allowed to occur in combination with intensification. Both are required to accommodate Auckland's growth, housing supply and affordability needs.

Summary of submission

1. The effect of the FDS is to reverse the "up and out" approach to growth that Auckland Council has consistently applied in its planning documents since the first Auckland Plan in 2012 and then the Auckland Unitary Plan (**AUP**), the Future Urban Land Supply Strategy (**FULSS**) and several structure plans.

2. The FDS's approach of restricting land supply and forcing intensification within the existing urban areas is not new. It was proposed previously in the AUP process when Council sought to include the Rural Urban Boundary (**RUB**) within the Regional Policy Statement (**RPS**). That approach was rejected by the Independent Hearings Panel on the basis it would lead to adverse and severe consequences for land affordability.

3. Developers and investors including the submitter have made significant investment decisions in reliance on the approach taken in these long term planning documents and decisions, which were just starting to deliver intensification in the right locations.

4. By severely constraining the land available for development, the FDS will increase the cost of residential, commercial and industrial land. It will cause uncertainty in the market and significantly slow down/pause the development of much needed housing in Auckland. This outcome is in direct conflict with the objectives of the National Policy Statement on Urban Development (**NPS-UD**). Most particularly Objective 2 that planning decisions improve housing affordability by supporting competitive land and development markets.

5. By failing to appropriately consider any opportunity to expand into rural zoned areas, the requirement to robustly assess the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS has been ignored. This is in conflict with the NPS-UD (s3.14(1)(b)) and is the direct result of Council's resolution prior to the commencement of the FDS preparation directing Council officers to avoid "urban expansion into rural areas"[1]. This represents a fundamental flaw in the process, effectively discounting the benefits of urbanising rural land prior to commencing the FDS process.

6. By choosing to make such a significant step change in Auckland's approach to growth from the historical position, the analysis behind the FDS must at the very least be both compliant with all laws and robust. It is neither.

7. The approach taken to prepare the FDS did not comply with the law because it has not followed the process prescribed by the NPS-UD. Council have acknowledged that the Housing and Business Development Capacity Assessment (**HBA**) is incomplete. It has not assessed business land capacity and does not meet the requirements of the NPS-UD for residential land. The consultation process for the draft FDS fails to comply with the NPS-UD requirements. Neither the development community, nor iwi, were properly consulted with.

8. These process failings have led to fatal flaws in the evidence base upon which the FDS has been prepared. The FDS has not adequately considered whether land that is plan enabled will translate into actual capacity in terms of being feasible, infrastructure ready and reasonably expected to be realised. Capacity numbers have also not incorporated the mandatory competitiveness margin.

9. The evidence base upon which the FDS is based is deeply flawed and in no way justifies a complete reversal in the approach to Auckland's growth, from a previous approach that was based on a strong and tested evidence base.

10. The implications of getting this wrong are a severe constraint on land supply and a sharp increase in the cost of business and residential land.

11. Council's response to its process failings is to prepare a new or updated HBA in parallel with consultation on the FDS. This is entirely flawed. If the HBA is done properly, and if consultation is to be genuine, a new HBA will require redrafting of the FDS and a subsequent consultation process.

12. The only option for the Council is to pause the process and begin again. It must take the time to thoroughly complete an HBA with an accurate and defendable evidence base on capacity numbers that all parties can be confident in. In the meantime, the Council's existing FULSS could be updated to meet the Council's Long Term Plan obligations whilst it gathers a proper evidence base for its FDS.

[1] Resolution number PLA/2022/95

Process in preparing the FDS does not comply with the law

13. The submitter has serious concerns that several steps that are required by the NPS-UD have not been followed in the preparation of the FDS. The Council is required to comply with these steps under section 55(3) of the RMA.

14. The FDS must establish how the Council intends to provide at least sufficient development capacity over the next 30 years to meet expected demand (3.13(1)(a)(ii)). For residential land, the capacity must be (3.2(2)):

    a. Plan enabled; and
    b. Infrastructure ready; and
    c. Feasible and reasonably expected to be realised; and
    d. Meet the expected demand plus the appropriate competitiveness margin.

15. For business land, the capacity must be (3.3(2)):

    a. Plan enabled; and
    b. Infrastructure ready; and
    c. Suitable to meet the demands of different business sectors; and
    d. Meet the expected demand plus the appropriate competitiveness margin.

16. The FDS must spatially identify the broad locations in which development capacity will be provided over the long term to meet these requirements (3.13(2)(a)).

17. In order to do so, it must be informed by the most recent applicable HBA (3.14(1)(a)). The HBA must quantify the region's capacity needs, again complying with the above criteria ("at least sufficient capacity", plan enabled, infrastructure ready, feasible, reasonably expected to be realised, including a competitiveness margin) (3.20(1)(c)).

18. The FDS has failed to comply with these requirements in several fatal ways:

    a. There is no HBA in existence that assesses business land requirements. In an LGOIMA response to the submitter's Counsel, the Council advised "*The business capacity assessment, fulfilling the requirements of the NPS UD, has not yet been finalised and published. However, information and data informing the preparation of the assessment has been used to inform the draft FDS*." This raises serious questions:

        i. How can a long term strategy draw conclusions on Auckland's business land requirements before the capacity is understood?

        ii. Will the public have the opportunity to review the business HBA through a further consultation period?

iii. Given the Council's focus on people living and working in close proximity, how have decisions been made on residential capacity and the location of new residential growth areas in the absence of evidence on business land capacity and an analysis of where additional business land will be located?

b. In terms of residential land, the FDS's conclusions on capacity:

i. Do not demonstrate "at least" sufficient capacity is provided for;

ii. Rely heavily on 'plan-enabled' capacity with little focus on what is feasible both from an economic viability perspective and a property perspective such as examining unit title or cross lease restrictions;

iii. Do not assess what percentage of total plan enabled capacity is reasonably expected to be realised (which could assess realised capacity under the AUP compared to plan enabled and modelled capacity, and take lessons from this process);

iv. Do not assess 'infrastructure ready' development capacity, noting that the Council has failed to do any analysis in terms of the cost of its proposed brownfields intensification which the submitter knows is generally more expensive than greenfields developments given the current capacities, age and condition of much of the existing infrastructure in the Region. The Council has also failed to give any consideration to alternate funding sources for infrastructure and have assumed that rates and development contributions are the only way to fund infrastructure. This is incorrect and again highlights the lack of robustness and incomplete nature of the assessments undertaken;

v. Do not incorporate the required competitiveness margin;

vi. Are based on a medium growth scenario, with no assessment of a high growth scenario (notwithstanding current immigration rates, which indicate a high growth scenario is more likely);

vii. Rely heavily on the section 32 report prepared for Plan Change 78 and the assumed capacity that this plan change will provide, despite:

1. PC78 being paused for one year while the Council undertakes a comprehensive natural hazard and flooding assessment;

2. The inevitability that this flooding assessment will result in a reduction in feasible capacity;

3. Once PC78 is re-published taking into account the outcome of this flooding work, it will be subject to a further round of public submissions, expert evidence, hearings before an Independent Hearings Panel, recommendations, decisions, and possibly appeals;

4. Given this process still to come, at this point PC78 is very uncertain and cannot be relied on;

5. Both major political parties have announced they will either review or revoke the Medium Density Residential Standards, meaning reliance on PC78 for the FDS is even more dubious.

19. Council has acknowledged these failings in its LGOIMA response dated 12/7/23. It has advised that infrastructure-ready development figures will be available by late July, that there will be a business capacity assessment published in August and an updated HBA will be available "later in the year." It has acknowledged that the FDS is based on the "best information available at the time" and that the FDS could be updated over time as better information becomes available. This response alone shows the failure to comply with legal requirements, the inadequacy of the current proposed FDS, and raises issues as to the extent that it can be relied on. A table summarising the NPS UD requirements and the Council's LGOIMA response is attached (**Attachment A**). This clearly demonstrates the failure to comply with legal requirements, and the lack of robustness of the FDS.

20. How can the FDS make findings on when and where growth can occur to meet projected population, before the assessment on infrastructure ready capacity is completed? This on its own is sufficient to show how the analysis behind the FDS is inadequate and ignores the need to also assess feasibility and whether it will actually be realised.

21. The NPS-UD also requires the Council to consult with the development sector when preparing the draft FDS (prior to the public consultation process) (3.15(2)(f)). The purpose of this is to identify significant future development opportunities and infrastructure requirements. The Council's two meetings with the Property Council were insufficient to meet this requirement:

    a. There is no evidence that the Council sought or took on board any input from the Property Council on development opportunities. Property Council's presentation at the 'Have your Say' event on 21 July confirmed that even Property Council does not consider it was properly consulted with. 93% of members that they surveyed said they had not been consulted with in the drafting of the FDS;

    b. It was a big call for the Council to rely solely on one entity to represent such a large and diverse sector. It is unclear on what basis the Council decided that this body was in fact able to provide all the information the Council needed to prepare the FDS;

c. The submitter is the proponent of the largest private plan change brought under the AUP (see reference below to PC88). It is very peculiar that it was not included in consultation given it clearly has insights on "future development opportunities" that would have been helpful to the Council when preparing the FDS. The submitter has had various meetings with the Council over the last three years to discuss PC88 and the Council has even "accepted" the plan change for notification. Throughout the process leading to notification there has been ample opportunity to meaningfully consult on the FDS. This never occurred.

d. Finally, the "consultation" opportunity to present to the Council held on 21 July was a façade with less than half of the Councillors attending and no transparency as to which of the Councillors online were actually present and listening. Given the significance of the FDS this is extremely disappointing and in no way represented meaningful engagement. It was after the fact, too little and too late and simply added to the failure of the process to meet legal requirements.

22. The Council also appears to have fallen short in its involvement of iwi when preparing the draft FDS. Reviewing previous engagement with iwi from other processes is severely lacking in the circumstances where a complete reversal in approach to development is being pursued, which will have major implications on the ability that Māori will have to develop Māori land for economic and social wellbeing.

Implications of flawed process

23. The implications of this flawed process are significant.

24. The submitter is deeply troubled that the FDS has used a starting point that is not founded in a proper evidence base to make the very significant decision to reverse the long term approach to growth and change of building "up and out". This approach has been consistently applied in planning documents since 2012. The Council has used this flawed evidence base to make the bold conclusion that existing urban areas contain sufficient development capacity and that no greenfield development is required over the long-term.

25. In reality, it has:

a. substantially over-estimated the capacity of existing urban areas;

b. under-estimated the greenfield land that will be required to meet population growth;

c. constrained land supply (both housing and business) to the point that there will be a severe increase in land prices over the medium and long terms; and

d. ignored greenfield opportunities, even where they would meet a number of the stated overarching objectives/principles that the Council seeks to achieve in the FDS (e.g. the placing of workplaces and housing together).

26. This issue is not new. Through the AUP process, a significant volume of evidence was considered on whether the RUB should be contained in the RPS or whether it should sit in the District Plan, where private developers could submit private plan change requests to move the location of the RUB in accordance with the structure planning process when criteria were met.

27. These criteria (B2.2.2(2) of the AUP) are comprehensive and include (among others) the efficient supply of land for residential, commercial and industrial activities and social facilities; integration of land use and transport including a range of transport modes; providing choice that meets the needs of people and communities; and avoiding scheduled natural and physical resources, elite soils and areas with significant natural hazard risks.

28. The Council sought to include the RUB within the RPS as a tool to restrict land supply and force intensification within the existing urban areas (the approach being taken in the FDS). However, the Independent Hearings Panel found that this would lead to adverse and severe consequences for land affordability. It stated in its recommendation reports (emphasis added):

> **The Panel was not convinced that the location of the Rural Urban Boundary of itself is an appropriate planning tool to support development of a compact urban form in the existing metropolitan area**. The Panel considers the planning tool to best achieve that form of development is the appropriate zoning to enable intensification in and around centres and transport corridors (the Centres and Corridors strategy). It appears to the Panel the only meaningful way in which the Rural Urban Boundary could be used to support compact urban development is to signal a tight and firm restriction on the supply of future urban land, with a view to forcing more intensive use of the existing metropolitan areas than otherwise would be the case. **Mr Thompson and Mr Norgrove provided evidence that such an approach would drive urban land prices higher than otherwise would be the case and would be contrary to the objective of promoting more affordable access to appropriately-zoned land for housing, commercial and industrial use. The Panel agrees.**
>
> The Panel was also not convinced by the related proposition that the Rural Urban Boundary should be located so as to attempt to match the supply of future urban land with estimated demand (and no more) over the next thirty years. The Panel simply does not have available to it the necessary information or a recognised method to attempt to match with any confidence the supply of urban land with its estimated demand across the Auckland region over the next ten years (let alone for thirty years). **The Panel also received evidence, which it accepts, that the costs to people and communities of under-enabling supply are much more severe than those arising from over-enabling supply.**

29. The FDS reverses these decisions.

30. This approach of tightly restricting development is in direct conflict with the IHP's findings that under-enabled supply could lead to severe affordability impacts and in direct conflict

with the purpose of the NPS-UD. The IHP's findings were based on extensive evidence from a broad cross section of parties (including the Council) parties and extensive comprehensive modelling. This is in contrast to what is now proposed which is based on flawed and incomplete analysis that would not withstand any judicial scrutiny.

PC88

31. One of the submitter's property interests is as an investor in, and Manager of, property owned by Beachlands South Limited Partnership (**BSLP**). BSLP is the requestor of Proposed Plan Change 88 - Beachlands South (**PC88**) to the AUP. BSLP is a limited partnership between MIB Limited Partnership (a Russell Property Group entity), NZSF Beachlands Limited (a New Zealand Superannuation Fund entity) and Ngāi Tai Hāpai Development Limited Partnership.

32. PC88 is a high quality and large-scale urban development project to extend the coastal town of Beachlands. PC88 proposes to rezone approximately 307 hectares adjacent to the existing Beachlands coastal township to a variety of residential and business zones, as well as 159ha for Future Urban zoning. Beachlands is unique in that it is a coastal settlement in Auckland that is able to be expanded and has direct access to an existing commuter ferry service. It therefore offers significant opportunity to deliver a high quality lifestyle in a desirable location to more Aucklanders.

33. PC88 will result in a number of positive outcomes including:

    a. Introducing a variety of activities to the existing Beachlands town including new and enhanced high quality housing, employment, hotel and golf course, open space/community and education facilities. It will result in a well-functioning urban environment that is connected to the existing Beachlands coastal town and provides for Auckland's growing population.

    b. Ngāi Tai Hapāi as a partner in the development will ensure that mana whenua values will be recognised and given effect to by the inclusion of the Cultural Landscape Plan and Mana Whenua standards/provisions within PC88.

    c. The project supports a reduction in greenhouse gas emissions. It increases the density of development within Beachlands and brings jobs and education to a growing residential area. It also bolsters the existing public ferry service to reduce reliance on private vehicle trips. Forest sequestration within the site and water sensitive design are also built into the project.

    d. The project makes contributions to local transport infrastructure and improvement of the existing ferry service.

    e. The project protects and restores the natural environment by covenanting approximately 80 hectares of land within the PC88 area that comprises an ecological corridor to create an Ecologically Protected Area Network (EPAN) area.

f. The project makes provision for new primary and secondary schools within the PC88 land which will reduce current school vehicle trips and increase intrazonal trips.

34. Land for PC88 was purchased, and PC88 has been prepared, on the basis of the AUP provisions (including Policy B2.6.2(3)) which enable ***the expansion of coastal towns and villages*** to meet Auckland's housing and business land capacity needs. The FDS reverses this policy framework by preventing new greenfield development over the long term.

35. If the draft FDS is implemented in its current form (and incorporated into the Regional Strategic Plan), the positive outcomes noted above will not be delivered to the local community. Housing choice to live in a coastal location such as Beachlands will be lost. The land supply constraints of this proposed FDS will also significantly impact on housing affordability in the Region.

36. The prejudice to BSLP will also be severe. Putting aside the land purchase and holding costs spent in reliance on the Council's rules allowing for the expansion of coastal towns, BSLP has made a significant investment over three years on the preparation of its private plan change application including on:

a. an international design competition to master plan the site;
b. well over 30 experts engaged to extensively assess the project including in relation to: carbon reduction and sequestration, greenhouse gas emissions, ecology, transport and roading enhancements, and employment opportunities;
c. extensive community engagement and involvement of local iwi from the outset; and
d. engagement with infrastructure providers and government agencies.

Relief

37. In light of the significant process failings and the flawed and incomplete evidence base upon which the FDS has been prepared, the only response now is to pause the FDS process and begin again in a way that is legally correct. This means waiting for an HBA to be prepared that meets the requirements of the NPS-UD and does not rely on unfounded capacity that may or may not be realised (including through PC78).

38. A new FDS must then be drafted in consultation with the development community (which means a wide selection of its diverse members) and with proper consultation with iwi. This new FDS will need to be consulted on, and given the significance of these issues a full public hearing would be expected (as is happening in other parts of the country).

39. As alternative relief, we request that plan changes that have been accepted and notified are exempt from the FDS. It is inappropriate for plan changes in this category, such as PC88, to be subject to such a significant policy change, particularly those that are specifically provided for in the RPS as the expansion of an existing coastal town.

40. The submitter acknowledges that an FDS is required to feed into the Council's Long Term Plan 2024, and that delaying the FDS process would mean it cannot inform the LTP. This is not a reason to pursue a flawed FDS. The Council's FULSS is an existing development strategy that could be updated to inform the LTP while the evidence base for the FDS is gathered. The FULSS meets most of the criteria of the FDS in the NPSUD under Clause 3.13, but for a statement on hapu and iwi aspirations which could be migrated from the FDS (assuming this was properly consulted on). In short, the key components of the FULSS could remain the same in an updated version used to inform the LTP 2024.

Attachment A

The FDS is neither compliant with legal requirements, nor robust.

The table below sets out the legal requirements for the FDS established in the NPS-UD, and how the Council has itself acknowledged in a response to an LGOIMA request that its process has not complied with those requirements.

These process failings mean the evidence sitting behind the FDS is not robust: the evidence is being prepared, peer reviewed and finalised after the FDS (for which it is meant to inform) has been drafted.

NPS-UD Clause		Council's Response to LGOIMA Request	Comment
3.14(a)	The FDS must be informed by the most recent applicable HBA for residential and business land.	*"We are currently working through an analysis of data and calculations for a new HBA to be published this year."* *"The business capacity assessment, fulfilling the requirements of the NPS UD, has not yet been finalised and published."*	No HBA has been completed for business land. The HBA for residential land is incomplete. A revised version meeting all the mandatory requirements will not be published until after the consultation period on the FDS is over.
3.20	The HBA must quantify the development capacity that is sufficient to meet expected demand for housing and business land in the short, medium and long term.	*"The business capacity assessment, fulfilling the requirements of the NPS UD, has not yet been finalised and published."*	No HBA has been completed for business land. The HBA for residential land is incomplete. A revised version meeting all the mandatory requirements will

			not be published until after the consultation period on the FDS is over.
3.2(2)	'Sufficient development capacity' for residential land means plan-enabled, infrastructure ready, feasible and reasonably expected to be realised.	*"Reference is made in the Draft FDS to a total plan-enabled capacity of 2,345,500 dwellings."*	The FDS has relied on plan-enabled development capacity only.
3.25(c)	Every HBA must quantify, for the short term, medium term, and long term, the housing development capacity for housing in the region that is: **plan-enabled**	*"Reference is made in the Draft FDS to a total plan-enabled capacity of 2,345,500 dwellings. This is based on the evaluation of development capacity done as part of the Section 32 evaluation for Plan Change 78, which builds on the 2021 HBA."*	Development provided by PC78 is not 'plan enabled' because this plan change is not operative and likely to change as a result of the natural hazard work being undertaken and then subject to decisions by independent commissioners who may make significant changes.
3.25(c)	Every HBA must quantify, for the short term, medium term, and long term, the housing development capacity for housing in the region that is: **infrastructure ready** -	*"In terms of 'infrastructure-ready development capacity', we are currently working through an analysis of data and calculations for a new HBA to be published this year. The matters to be considered are complex and subject to numerous inputs, and require multiple checks and technical reviews. We anticipate that we will be in a position to provide you with infrastructure-ready development capacity figures by late-July, ahead of the publication of the HBA later in the year."*	Not assessed in time to inform the FDS.

3.25(c)	Every HBA must quantify, for the short term, medium term, and long term, the housing development capacity for housing in the region that is: **feasible**	*"The matters to be considered are complex and subject to numerous inputs, and require multiple checks and technical reviews."* *"A new HBA will be published later this year"*	Not assessed.
3.25(c)	Every HBA must quantify, for the short term, medium term, and long term, the housing development capacity for housing in the region that is: **reasonably expected to be reaslised**	*"The matters to be considered are complex and subject to numerous inputs, and require multiple checks and technical reviews."* *"A new HBA will be published later this year"*	Not assessed.
3.2(2)(d); 3.22	Local authorities must provide development capacity with a competitiveness margin (20% for the short and medium terms and 15% for the long term) **over and above the expected demand** for both housing and business land.	*"The most recently published HBA for housing establishes demand including competitiveness margin."*	The FDS does not provide for a competitiveness margin in its residential and business capacity figures.
3.28	Every HBA must estimate, for the short, medium and long term, the demand from each business sector for	*"The business capacity assessment, fulfilling the requirements of the NPS UD, has not yet been finalised and published."*	No HBA has been completed for business land, as is mandatory.

	additional business land in the region.	*"The Business Capacity Assessment needs to be finalised (including peer review) and published before we are in a position to have greater detail in terms of data and greater confidence in the data."*	
3.29	The business capacity must assess plan-enabled, infrastructure ready and suitable for each business sector in the short, medium and long term.	*"The business capacity assessment, fulfilling the requirements of the NPS UD, has not yet been finalised and published."* *"The information relied on to inform the draft FDS was not finalised and published, however represented the best information available at the time."* *"The Business Capacity Assessment needs to be finalised (including peer review) and published before we are in a position to have greater detail in terms of data and greater confidence in the data."*	No HBA has been completed for business land, as is mandatory.

Consultation and Engagement			
3.15(2)(f)	In order to prepare the draft FDS, local authorities must engage with the development sector to identify significant future development opportunities and infrastructure requirements.	*"Council staff involved in the preparation of the draft FDS have met with staff and members of The Property Council on two occasions."* *"Staff have also had several meetings with staff from Kainga Ora, to understand the perspectives of that organisation as a major stakeholder in the development sector. Kainga Ora construct public housing but also have relationships with a large number of private developers and construction firms."* *"A development survey (copy attached) was sent to a large number of development companies and entities on council's database. Council received 30 responses to the survey."*	This consultation is insufficient. The submitter and other major developers were never consulted, despite the submitter's plan change being accepted and it supplying significant development and infrastructure opportunities.

Future Development Plan 2023 #8548

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

Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

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)

Focusing growth

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

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

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

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

- [ ] Agree
- [x] Disagree
- [ ] 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.

Accessible local centres

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

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

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

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

Tell us why

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?

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

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?

- [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

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.

Need more room? You can attach extra pages.

Future Development Plan 2023 #8549

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

Greenhouse gases must be cut in a rapid and sustained manner to avoid temperatures rising above 1.5C. According to the 2021 UN Global Methane Assessment, methane, of which a third comes from animal agriculture, must be cut by 45% by 2030. Doing so will prevent a 0.3C temperature rise by 2045, buying us time for carbon dioxide, a longer-lived gas, to reduce.

Resilient infrastructure

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

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

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

Tell us why

Other feedback

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

Please see attached submission

From:	Desiree Tukutama on behalf of Mayor Wayne Brown
To:	Future Development Strategy
Subject:	FW: Include the Plant Based Treaty in your climate action plan
Date:	Thursday, 20 July 2023 4:35:58 pm

From: [redacted]>
Sent: Tuesday, July 18, 2023 5:39 PM
To: Mayor Wayne Brown <Mayor.Wayne.Brown@aucklandcouncil.govt.nz>
Subject: Include the Plant Based Treaty in your climate action plan

Dear Mayor Wayne Brown,

More than 20 cities worldwide have endorsed the Plant Based Treaty including Los Angeles and the Scottish capital, Edinburgh.

A coalition of groups, including Climate Save Movement, Vegan Society Aotearoa New Zealand and Evidence Based Eating NZ, is urging city councillors across the country to support sustainable diets by signing the Plant Based Treaty initiative.

The UN Secretary-General António Guterres' described the release of the IPCC sixth assessment as a 'code red' for humanity and our last chance to avoid catastrophic climate breakdown.

Greenhouse gases must be cut in a rapid and sustained manner to avoid temperatures rising above 1.5C. According to the 2021 UN Global Methane Assessment, methane, of which a third comes from animal agriculture, must be cut by 45% by 2030. Doing so will prevent a 0.3C temperature rise by 2045, buying us time for carbon dioxide, a longer-lived gas, to reduce.

The Plant Based Treaty is designed to put food systems at the forefront of combating the climate crisis. Modeled on the popular Fossil Fuel Treaty, the treaty aims to halt the widespread degradation of critical ecosystems caused by animal farming and promote a shift towards healthier, sustainable plant-based diets.

More than 650 politicians back the treaty, along with IPCC scientists Dr. Peter Carter and Professor Julia Steinberger, and Nobel Laureates, including Klaus Hasselmann and Roger D. Kornberg.

More than 3,000 groups and businesses have signed on, including the Ocean Preservation Society, Fridays For Future Digital, and chapters of Greenpeace and Friends of the Earth.

Please visit www.plantbasedtreaty.org, where you can sign your name to endorse the Plant Based Treaty or consider putting forward a motion for your city to endorse. You can email hello@plantbasedtreaty.org for a sample motion.

Thank you for taking climate action today to secure a future for all.

Sincerely,
[redacted]

[redacted]



Plant Based Treaty Supporter

Future Development Plan 2023 #8550

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Your feedback

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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

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

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

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

Tell us why

Other feedback

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

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.

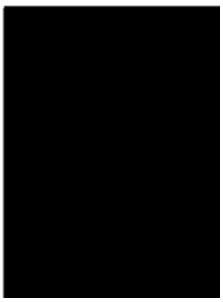
6.13 NTKT and NTW do not want to spectate at this potential of any student being injured or killed in a school bus accident and would rather intervene and provide an immediate solution all of which the local community support.

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 #8551

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Your feedback

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

Other

Tell us why

Please see attachment

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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?

Please see attached submission

[redacted]

From: [redacted] on behalf of Consultation
Sent: Wednesday, 26 July 2023 5:44 pm
To: Future Development Strategy
Subject: FW: Join our online information session: draft Future Development Strategy

Follow Up Flag: Follow up
Flag Status: Completed

Ngā mihi | Thank you

[redacted] **| Project Administration Coordinator**
Shared Support Services | Corporate Support Services | Group Services

Phone: [redacted]
Auckland Council 135 Albert Street, Auckland 1010
www.aucklandcouncil.govt.nz

From: [redacted]>
Sent: Wednesday, July 26, 2023 2:03 PM
To: Consultation <Consultation@aklc.govt.nz>
Subject: Re: Join our online information session: draft Future Development Strategy

Dear New Zealand Government officials and all members of Congress and all the leaders of the Auckland Council ！

New Zealand cannot join NATO military organizations ！

The purpose of NATO's military organization is to encircle and attack others and kill people.

If the New Zealand government claims that the "anti-nuclear weapons" policy is to protect the earth and all mankind, the New Zealand government also sets up nature reserves to protect historical and cultural heritage.

However, the New Zealand government joined the international terrorist killing organization, driving New Zealanders to kill people on the battlefield, blowing up the world, and causing more deaths around the world.

This is such a ridiculous and hypocritical lie and scam ！

The New Zealand government has been manipulated by international monopoly capital interests ！

The New Zealand government must establish its own international financial market trading system, help NewZealanders raise funds, develop the economy of New Zealand countries, cooperate with the world's most advanced high-tech enterprises, and build a civilized legal system, fair and just, science and technology advanced modern New Zealand .

Bank interest rates in China are lower than those in many countries.

The New Zealand government should consider inviting Chinese banking enterprises and investment companies to open banking business, financial capital business, financial lending business, fundraising and financing business, international financial market trading business, free conversion and transfer business of currencies of various countries ...

News media reports :
The Japanese government has legislated that all data and information used for the research and development of artificial intelligence technology AI industry are not protected by patent laws .

That is to say :
The Japanese government encourages everyone to use the data information they obtain from various aspects and areas of expertise to develop artificial intelligence technology AI high-tech industry, will not pursue legal responsibility for infringement of intellectual property protection, and information and data resources are shared by the people of the whole country .

The New Zealand government needs to adopt such policies and legal systems to encourage and develop artificial intelligence technology and AI high-tech industries .

Not long ago, the United Nations adopted a project to make "guaranteeing the right to development" an " international human right ”.

The New Zealand government cannot blindly join NATO's military organization and wage war together to contain and attack other countries. This is a crime that violates "international human rights law" and will be recorded in history forever .

The New Zealand government needs to encourage NewZealanders to establish a world cultural and historical museum and art gallery, a science and technology education center, an international commodity exhibition and trade conference hall, and promote the development of New Zealand's national economy, industry and tourism, international financial services industry and educational undertakings and scientific research .

The New Zealand government needs to unite with the world's giants of science and technology education to share the earth and various natural and social resources, and jointly build a civilized modern country for the benefit of the world.

The New Zealand government cannot participate in NATO's international terrorist military organization to kill ！

Thank you very much !

Life Power Massage



[redacted] 于 2023年7月26日周三 上午2:41写道：

Dear New Zealand Government officials and all members of Congress and all the leaders of the Auckland Council ！

I am very grateful for the extended time to gather New Zealanders' advice on the development of the city of Auckland ！

I hope that the New Zealand Government can help all New Zealanders to plan their own future and development direction, and help New Zealanders build a better life through their own efforts .

I do not want some people to manipulate the power of New Zealand's national government, let a small number of racists and foreign super conglomerates monopolize New Zealand's resources, and plunder the wealth of New Zealand countries and New Zealanders .

The New Zealand Government cannot allow the planet's and national resources to fall into the hands of racists and foreign conglomerates as their private property .

If the resources of the planet and the nation make racists and foreign supercorporations private property, how can people and poor people of other races on the planet exist and live on Earth ？

The New Zealand Government needs to develop a civilized society and modernize the New Zealand nation .

During World War II, the Nazi Party in Germany murdered more than 6 million Jews.

The Nazi Party in Germany accomplished its goal of genocide through democratic elections. They are done legally in accordance with the law.

Of course, some people always want to cover up the historical truth, confuse the public, and mislead the people of the world. Therefore, many people do not know the cause and truth of the extermination of the Jews by the German Nazi Party .

During World War II, the Jews of Germany monopolized the political and social living materials of Germany, causing the angry German people to use the German state apparatus and state power to commit genocide against this greedy, shameless and unscrupulous entire Jewish race. What a cruel and bloody lesson ！

Racists in New Zealand are replicating the greed and evil of the Jewish consortium during World War II, usurping the entire country's land and resources, as well as water resources, and want to implement racists to govern the future fate of all New Zealanders, who claim to "co-govern" the New Zealand Government and New Zealanders .

Racists in New Zealand have become a serious social issue even for their own survival. Some racists in New Zealand need people of other races to create wealth to feed them. They do not have enough wisdom and ability and expertise to create ways for their entire race to cope with and adapt to economic development in the midst of global political and economic turmoil. They cannot find a living space in the fierce global economic competition .

Racists in New Zealand want to manage the population of other races by creating "racial privileges" and exploit the profits created by the people of other races to support themselves .

The New Zealand Government must allow all mankind to share the earth's resources, and let people with wisdom and ability and expertise manage the public affairs of the New Zealand Government, so that New Zealand's national planning can truly benefit society and all mankind .

First of all, the New Zealand Government must formulate a concrete plan for the modernization of New Zealand society and the country .

The New Zealand Government needs to develop the primary industry, the secondary industry and the tertiary industry at the same time .

The primary industries are agriculture, forestry, animal husbandry, and fishing .

The secondary industry is manufacturing, which requires the purchase of various engineering equipment, machines, and the establishment of network engineering.

The tertiary industry is the financial industry and various government services .

The New Zealand Government must develop the financial industry, establish a sound global international financial market, help New Zealanders create enterprises, and develop globally .

The New Zealand Government must provide a variety of high-quality and high-level national infrastructure, engineering networks, science and technology education, legal systems, help New Zealand's national and private enterprises to develop globally, and ensure the safety and efficiency of New Zealand enterprises, maintain the normal order of global economy and trade and good cooperation and development between global enterprises, create more government tax revenue, and benefit the whole society and the people of the world .

My shop is located in Birkenhead Commercial Center, North Shore City, Auckland .

I want to plan the whole of North Shore City as an economic development zone. Establish an international airport, an international ship port terminal, a container terminal, establish a railway line connecting the whole territory of New Zealand, establish an international financial center, and a logistics and transportation distribution center .

I want the New Zealand Government to establish some cultural and art museums, science and technology museums, international exhibition halls, educational institutions, and global high-tech economic industrial parks in North Shore City .

I hope to set up pedestrian shopping streets, free-flowing commercial stalls in Birkenhead, Northcote, Takapuna, Devonport .

Big conglomerates have snapped up real estate in the business district. The poor cannot get bank loans .

It is difficult for the poor to establish their own business on land monopolized by big business... Especially for entrepreneurs in innovative high-tech industries and art industries, it is difficult for entrepreneurs to pay expensive

real estate rents before they gain market recognition, before they develop high-tech products and make profits, and before artists create artworks that are accepted by market consumers .

New Zealand develops high-tech industries and has unlimited space for development. AI can design and manufacture systems by itself and produce robots by itself. AI has replaced a lot of programming technicians, replacing a lot of illustrators. Unmanned cars, drone delivery, unmanned supermarkets, unmanned hotels, unmanned warehousing, unmanned manufacturing plants, unmanned automated unloading docks and ports, unmanned automated greenhouse planting, UAVs and computer network systems "one-stop" management of livestock farms grazing and slaughtering and product manufacturing ... The trend of high-tech industry has swept the world .

I hope to set up a pedestrian street at Birkenhead Commercial Bank, expand the scope of the commercial district, recruit and acquire residential houses near the roadside near the Birkenhead commercial district, renovate and set up a mobile stall area that is open every day, and increase the flow of customers in Birkenhead Commercial Street .

New Zealand was flooded. Some flood victims suffered property damage. They asked the New Zealand Government to spend taxpayer money on their property destroyed by the floods .

New Zealand has some big conglomerates that hoard a lot of land and real estate in commercial streets. A lot of land and real estate in commercial streets are vacant, and no one has rented shops for a long time. 10 years, 20 years, or even, longer vacant houses and land .....

Many poor people cannot afford expensive rents to start businesses. Or, many operating businesses can't afford skyrocketing rents, resulting in business closure and bankruptcy. The economy of the New Zealand country has been severely hampered and damaged .

This is an economic catastrophe created by man **!**

The New Zealand Government must legislate, regulate and plan scientific and rational national economic development policies and order to promote the economic development of New Zealand countries .

It is necessary for the New Zealand Government to expropriate and acquire land and houses that have been idle for a long time and to redesign the country's economic development structure, and it is a legitimate move in the interests of the country and people of New Zealand .

Please Government of New Zealand Legislation :
All natural resources of New Zealand, including land resources and mineral resources and marine resources and seabed and water resources, geothermal resources and space are all owned and shared by all mankind. All economic development data owned by the New Zealand government and support all New Zealand people in scientific research and education and national economic development.

Please New Zealand Government Legislation :
It is a criminal offence to sell all organizations, groups and individuals that sell the territory of the New Zealand country and undermine the national security and economic development of New Zealand. (In particular, racists and foreign supermonopolies own the natural resources shared by the people of New Zealand and all the scientific research results and economic development information data owned by New Zealand).

Racists in New Zealand want to own everything in New Zealand.

The National Party wants to sell the land New Zealand will use for development over the next 30 years to a private consortium.

These are all criminal acts that have brought calamity to the country and the people of New Zealand.

The New Zealand government must bring these criminal groups, groups and individuals to justice.

The United States and Western countries disintegrated the former Soviet Union, divided a country in the former Soviet Union into a large number of small countries, and turned Russia and the CIS countries in Eastern Europe into poor and backward countries through the implementation of the privatization system. The super-rich of the United States have turned the assets of these former Soviet state resources and important state-owned enterprises into their private property .

Ukraine went from being a richer country to being the poorest in Europe.

Ukrainian politicians have already packaged and sold almost all of Ukraine's land resources and the assets of state-owned enterprises to supermonopoly capital groups in the United States and Western countries. Therefore, the United States and Western countries do not want the Ukrainian people to exist on the planet . The United States and Western countries manipulated Ukrainian politicians to push the Ukrainian people into battle and send them to death.

Numerous news media reports : The United States wants the Ukrainian people to fight to the last man .

If all land resources and state-owned enterprises in Ukraine are jointly owned by all Ukrainian people, state-owned resources and state-owned enterprise assets cannot be sold to foreign consortiums.

Then, the war between Russia and Ukraine will not continue to the present . Even, Russia and Ukraine will never go to war .

Because if the big business groups of the United States and Western countries do not get benefits, they will not spend so much money and resources to fight wars .

Please The New Zealand government is developing high-tech industries ！

Please The New Zealand government builds the country's modern infrastructure :
The establishment of a global digital network system.
Build a global international financial market.
Build a secure global artificial intelligence technology, AI, automated data analysis system.
Online commodity trading system.
Free currency conversion and transaction transfer system for different countries.
Bank instant transfer and exchange settlement system .

Please The New Zealand government needs to legislate :
The government restricts the rent of real estate for New Zealand real estate investors to no more than a certain percentage of the average personal income of New Zealand wage earners.
(Some singles may not be able to pay the rent of the housing with their full income.).

Commercial real estate investors cannot raise rents at will and cannot evict tenants at will.
In that way, the business that the commercial tenant has worked hard to build will be owned by the landlord, and the business of the commercial tenant will be destroyed by the landlord .

Shops built in commercial streets and business districts are all under the management of local councils and local government departments.
(Some landlords rent out shops to tenants, and then, in the name of the landlord's management company, force various fees to be added to tenants until the tenant's business closes and the tenant is evicted).

The landlord's shop has all the business insurance.
It is usually the tenant who bears the cost of insurance.
If there is any damage, the insurance company will compensate for it.
However, some landlords extort money from tenants under the pretext of damaging their homes.

The New Zealand government needs to legislate :

Commercial shops operating business projects need to be decided by local government departments, and business operators who meet government standards can create their own new businesses.
If the landlord does not have a reasonable and valid reason, he cannot prevent and hinder the tenant from operating the business project approved by the government department.
Because some tenants want to create businesses that they did not have before, or, create new products and new business models, especially high-tech industries, adopt new energy, new materials, manufacture and sell new products and provide new services...
The landlord does not operate a real business, and some new products, the landlord has not seen and does not have the expertise and technology in this area, the landlord cannot understand the status of the tenant's business operation .

Please The New Zealand government provided us with mobile stalls and allowed us to run small businesses to make ends meet.

If we are evicted by landlords, we can support ourselves on our own labor, and we do not want to receive government welfare benefits.

I now have a small shop in Birkenhead, North Shore City, Auckland, High Street, and I run a health massage business.

I welcome the Auckland Council to add mobile business operators or, street vendors, to the vicinity of my shop.

I have observed for a long time :
When the commercial street where my shop is located organizes entertainment activities, and there are many mobile stalls on the street to run business, the business of my shop is particularly good.
So, I support the Auckland Council to organize entertainment activities and increase mobile stall business near my store every day.

This is very good for my business.

I hope that the New Zealand government will not sell the New Zealand land to real estate investors.

The poor cannot obtain bank loans to buy land.

After the mega consortium buys the land that the New Zealand government intends to develop, they will hoard a lot of land resources, they will not develop the land and they will not run a business.

They waited for the opportunity to blackmail the New Zealand government, and then they demanded that New Zealand's taxpayers pay for it.
Or, they extort tenants, sucking tenants' blood to fatten themselves.

The government of New Zealand gave all the land to the people of New Zealand to start their own business.

By collecting taxes, the New Zealand government can help New Zealand build more modern national infrastructure and provide more advanced education.

Because many high-tech industries do not have this professional knowledge and technology in schools.

However, through global economic and industrial cooperation, the people of New Zealand can learn the latest and most advanced scientific knowledge, technology and special professional skills and services in the world .

For more details, I need to spend more time communicating with you in the future.

Thank you very much !

Life Power Massage



Auckland Council Engagement Team <notifications@engagementhq.com> 于 2023年6月30日周五 下午12:46写道：

Kia ora,

Consultation on Auckland's Future Development Strategy (FDS) is currently underway. We have heard that some people would like more time to provide their feedback. As a result, consultation will now close on 31 July 2023.

The proposed strategy

The 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.

We propose to continue some greenfield growth. However, 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 the extent of greenfield growth over the next 30 years. 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 solution

Find out more

Join our online information session to learn more about the draft Future Development Strategy and to ask questions of Auckland Council staff before submitting your feedback.

Thursday 6 July 2023
11am - 1pm
Register now

More details on the consultation, including the draft strategy, a shorter overview document, supporting information and FAQ's, are available at akhaveyoursay.nz/futureauckland.

Ngā mihi nui,

Future Development Strategy Team

You're receiving this email because you are a registered participant on AK Have Your Say.
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Future Development Plan 2023 #8552

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

Your feedback

Focusing growth

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

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

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

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

Other

Tell us why

Please see attached submission

Accessible local centres

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

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

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

Other

Tell us why

Greenhouse gases must be cut in a rapid and sustained manner to avoid temperatures rising above 1.5C. According to the 2021 UN Global Methane Assessment, methane, of which a third comes from animal agriculture, must be cut by 45% by 2030. Doing so will prevent a 0.3C temperature rise by 2045, buying us time for carbon dioxide, a longer-lived gas, to reduce

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?

[redacted]

From: [redacted] on behalf of [redacted]
Sent: Thursday, 20 July 2023 4:39 pm
To: Future Development Strategy
Subject: FW: Plant Based Treaty brings the solutions we need NOW!

Categories: Green Category

From: [redacted]>
Sent: Tuesday, July 18, 2023 11:52 PM
To: [redacted]@aucklandcouncil.govt.nz>
Subject: Plant Based Treaty brings the solutions we need NOW!

Dear [redacted],

More than 20 cities worldwide have endorsed the Plant Based Treaty including Los Angeles and the Scottish capital, Edinburgh.

A coalition of groups, including Climate Save Movement, Vegan Society Aotearoa New Zealand and Evidence Based Eating NZ, is urging city councillors across the country to support sustainable diets by signing the Plant Based Treaty initiative.

The UN Secretary-General António Guterres' described the release of the IPCC sixth assessment as a 'code red' for humanity and our last chance to avoid catastrophic climate breakdown.

Greenhouse gases must be cut in a rapid and sustained manner to avoid temperatures rising above 1.5C. According to the 2021 UN Global Methane Assessment, methane, of which a third comes from animal agriculture, must be cut by 45% by 2030. Doing so will prevent a 0.3C temperature rise by 2045, buying us time for carbon dioxide, a longer-lived gas, to reduce.

The Plant Based Treaty is designed to put food systems at the forefront of combating the climate crisis. Modeled on the popular Fossil Fuel Treaty, the treaty aims to halt the widespread degradation of critical ecosystems caused by animal farming and promote a shift towards healthier, sustainable plant-based diets.

More than 650 politicians back the treaty, along with IPCC scientists Dr. Peter Carter and Professor Julia Steinberger, and Nobel Laureates, including Klaus Hasselmann and Roger D. Kornberg.

More than 3,000 groups and businesses have signed on, including the Ocean Preservation Society, Fridays For Future Digital, and chapters of Greenpeace and Friends of the Earth.

Please visit www.plantbasedtreaty.org, where you can sign your name to endorse the Plant Based Treaty or consider putting forward a motion for your city to endorse. You can email hello@plantbasedtreaty.org for a sample motion.

Thank you for taking climate action today to secure a future for all.

Sincerely,

[redacted]

[redacted]

Plant Based Treaty Supporter

[redacted]

Future Development Plan 2023 #8554

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please refer to the attachment

FEEDBACK ON 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:

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Attention: Philip Brown

[redacted]

Future Development Plan 2023 #8555

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?

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B&A
Urban & Environmental

31 July 2023

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

Submission on the Draft Future Development Strategy

Introduction

This is a submission on the draft Future Development Strategy (**FDS**) on behalf of Oyster Capital (**Oyster**). The FDS was notified for submissions on the 6th June 2023.

Background to Oyster Capital

Oyster is a New Zealand owned company specialising in the development of land for both residential and commercial property projects across New Zealand.

Oyster was formed in 2003 and since then has continuously and successfully delivered a diverse range of industrial, commercial and institutional projects, as well as a number of large-scale master planned residential developments. Oyster's involvement in these developments begins at site selection, and continues through capital raising and initial designs, through to construction.

More recently, Oyster has specialised in the delivery of master-planned greenfield residential subdivisions, with examples of these in Whenuapai, Beachlands and Bishop Hill. Oyster has completed a 31.4 hectare development at Whenuapai Village comprising of 651 residential lots and town and neighbourhood parks.

Summary of Submission

Oyster notes that the Council is required to prepare an FDS in accordance with subpart 4 of Part 3 of the National Policy Statement on Urban development (**NPSUD**). Oyster is supportive of the response to growth within Auckland being led by a robust FDS. This is the first planning step in providing for growth and ensuring it is integrated with the provision of infrastructure at a strategic level.

A key part of preparing an FDS is ensuring it is prepared with genuine and meaningful consultation and engagement with the community, infrastructure providers, iwi and hapū, and land owners and developers. This engagement should be broad-based and encourage blue sky thinking, all informed by good quality evidence. Open communication ensures that the process is democratic and recognises that a wide range of parties will need to come together to implement the FDS. Not doing this, risks the Council zoning land and/or providing infrastructure in less efficient locations – that outcome would be more expensive overall.

The importance of getting it right is brought into sharp focus in Auckland, where the stakes are high. Auckland contributes 40% to the GDP of New Zealand, and ensuring that there is sufficient land supply for business and housing is an important plank in the economic development of the city and the prosperity of its people. Providing enough land supply enables opportunities for high-value businesses to grow and

employ more people, and supports the delivery of a greater range of housing choices by the market. If the strategy is not right, this may constrain the economic development of the region with negative consequences for the New Zealand economy as a whole.

Overall, it is apparent that short-term infrastructure constraints are driving the long term strategic plan for Auckland. The short-sightedness of this approach and the lack of any meaningful public discussion about it is disappointing. We encourage the Council to take a long term view (30 year) as required by the NPSUD. Oyster accepts that the Council is facing a significant infrastructure deficit and that it needs to look to alternative forms of funding to pay for growth, including higher levels of direct Government investment. If the Council and development sector work proactively together, the draft FDS provides the opportunity to negotiate this outcome with the Government in a comprehensive way. As it stands, the Council's unilateral approach to planning for growth in Auckland may help to suppress increases in general rates, but it fails to realise the longer-term and wider benefits of growth for the community.

In addition to these over-arching matters, Oyster considers that there are fundamental issues with the draft FDS that need to be addressed to ensure that the long term strategic planning for growth results in a well-functioning urban environment. The matters raised illustrate that the draft FDS does not meet the minimum legal requirements set out by the NPSUD and therefore a restart of the process is the most appropriate and efficient outcome.

In particular:

- Oyster is concerned that more transparency/rigour is needed around the capacity analysis that underpins the draft FDS to ensure this has been based on feasible and realisable development capacity and not just plan enabled capacity.
- Oyster is concerned that there are discrepancies between the number of additional dwellings identified within the FDS and the Housing Business Assessment (HBA). Furthermore, the number of dwellings required has been based on a medium growth scenario and further testing is required against a high growth scenario.
- Oyster is concerned that the Council has not completed its assessment of business demand and capacity and therefore the evidence base for the FDS is deficient. Further transparency/rigour is needed in relation to the analysis that has informed the location and sufficiency of business land.
- Oyster considers that more detailed spatial analysis is required that builds on the work undertaken for the strategic growth scenarios to ensure this is sufficiently robust and meets the requirements of the NPSUD.
- Oyster considers that any roll back or change in sequencing of future urban areas needs to be based on robust evidence informed by spatial analysis and not driven by current infrastructure limitations.
- Oyster is concerned that more analysis is required on the affordability impacts constraining greenfield growth.
- Oyster is concerned that there has been limited engagement with the development sector to develop the FDS. Furthermore, adopting the FDS by September 2023 provides limited ability to make meaningful changes in response to feedback received.

The submission below elaborates on these matters.

Demand and Capacity Analysis

Oyster note that despite the FDS stating that it meets the statutory requirement under the NPSUD to ensure there is at least sufficient development capacity to meet demand, it is not clear from the FDS or the supporting growth scenario evidence report that this is actually the case. In particular, there appears to be discrepancies or a lack of evidence basis used to inform this assessment, and it is not clear how the FDS meets the requirements set out in Section 3.2 and 3.3 in relation to feasible and realisable capacity and the appropriate competitive margin.

The evidence basis for determining demand needs to be robust and this is not currently the case. Section 3.3 of the FDS identifies that an additional 520,800 people and 200,000 households over 30 years is required based on Stats NZ medium growth projections. However this is inconsistent with the HBA which identifies 384,000 households over 30 years[1]. Furthermore, the FDS should in Oyster's view include a stress test against a high growth scenario to be sufficiently robust and to cater for uncertainty in Govt immigration settings.

The FDS concludes that there is plan enabled capacity of 2,345,500 dwellings and this is several times greater than expected demand. In Oyster's view the amount of development capacity is overstated with no consideration of the economic feasibility of development or no factoring of a competitiveness margin. Instead broad assumptions are made that much of the plan enabled capacity will be commercially feasible based on the existing take up under the Auckland Unitary Plan - there is no assessment to support this assumption. The lack of evidence and reliance on broad assumptions is a reflection of the lack of involvement of the development sector in the capacity assessment. The Council has confirmed that the infrastructure ready development capacity figures will not be available until August 2023. This does not provide the opportunity to analyse this information and understand how it has been applied in the draft FDS.

Oyster further notes that given the timeframe for PC78 has been extended, undertaking a capacity assessment now to inform the FDS is highly problematic as height and density across the urban area is yet to be resolved. In particular, the impact on capacity of the ongoing work on the response to natural hazards is yet to be understood.

In relation to business demand and capacity the FDS is based on initial results from the Council's Business Capacity Assessment which is still in draft form. The FDS concludes that there is likely to be sufficient plan enabled business capacity on a region wide basis however, there will be shortfalls in sub-regions for specific business sectors, particularly land extensive sectors, which we understand is approximately 1,000 hectares[2]. Given that this assessment is based on plan enabled capacity and has identified capacity shortfalls for land extensive sectors this does not appear to meet the NPSUD requirements and is a significant weakness of the FDS. The Council has confirmed that the updated Business Demand and Capacity Assessment will not be available until August 2023, after the close of submissions. This does not provide the opportunity to analyse this information and understand how it has been applied in the draft FDS.

Given that one of the key purposes of an FDS is to promote long term strategic planning which sets out how a local authority intends to provide at least sufficient development capacity over the next 30 years to meet expected demand, Oyster submit that much more transparency/rigour is needed around the capacity analysis.

[1] Housing Assessment for the Auckland Region July 2021 pg 59
[2] Future development Strategy – Overall Evidence Report pg 77

Growth Scenarios for Development

Clause 3.14 of the NPS:UD requires that the spatial strategy is informed by "consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS." Oyster note that while four growth scenarios have evaluated different levels of intensification and greenfield growth, this has been undertaken at a regional strategic level, with no understanding of the spatial composition of the different scenarios. In Oyster's view this analysis needs to be developed further with more detailed spatial analysis that evaluates:

- Feasible and reasonably expected residential development capacity on a sub-regional basis particularly to test the capacity assumed to be provided through intensification as opposed to greenfield growth.
- Location and sufficiency of business land especially for land extensive/industrial businesses. This should include an analysis of the locations for potential new industrial areas, which will in turn inform locations for supporting and proximate residential growth.
- Further scenario analysis of intensification options that considers the location and scale of intensification achievable across the urban area, noting that if a conservative approach to hazard management is taken in the urban area then more capacity will be required elsewhere to make up for this.
- Further analysis of greenfield areas not included within the current Future Urban zone, noting that there may be new opportunities for development beyond those identified over 10 years ago as part of the Auckland Plan and the original Future Urban Land Supply Strategy. Input from the development sector would support this aspect of the scenario development and analysis.
- The impact on housing choice, housing affordability and land prices. The preferred scenario as it stands will not provide choices that meet the varied needs of people and communities for a range of housing types and working environments noting Auckland's diverse and growing population.
- The ability to access employment and labour. The preferred scenario as it stands will result in fewer residents being able to access employment within a 30 minute commute because there will be a limited amount of local employment made available.

Oyster are strongly of the view that a different growth strategy may emerge as a result of more detailed analysis.

Greenfield Development

The FDS is either proposing significant roll back of future urban areas or is significantly pushing out the sequencing for release based on current funding limitations. In Oyster's view this approach is fundamentally flawed. It assumes that infrastructure costs for brownfield intensification are cheaper than greenfield suburban land which is not the case, particularly in urban areas where significant intensification is proposed and where infrastructure is struggling to cope with existing levels of development. Furthermore, while Oyster is generally not opposed to the use of infrastructure triggers within the Auckland Unitary Plan Oyster is opposed to the identification of "infrastructure triggers" within a high level FDS document based on the following observations:

- The use of triggers is problematic in that the analysis undertaken to identify the infrastructure upgrades required is likely to have been undertaken at a coarse scale with no further explanation provided as to how the proposed triggers have been identified;
- The actual infrastructure requirements will vary depending on factors including the nature of the development and infrastructure solutions proposed and the status of development on neighbouring sites; and
- Over time, infrastructure requirements and solutions are likely to change.

In Oyster's view the current infrastructure limitations should not be driving land use decisions and a long term holistic approach is needed which:

- Identifies enough land for growth in the right locations where it can be delivered efficiently.
- Identifies what infrastructure is needed to support all future development (not just greenfield), and roughly how much will it cost, focusing on the next 10 years.
- If there is a funding gap, think creatively to find solutions, working in partnership with the Government and the private sector.

Another key factor that is driving the proposed roll back of future urban areas is the need to reduce carbon emissions. The emissions assessment that has been used to inform the proposal has been undertaken at a strategic regional scale and we understand it is focussed on transport modelling focussed on vehicle kilometres travelled. The performance of different FUZ areas however, will depend on land use mix, design and the sizing of the existing bulk infrastructure developed to date. A more detailed analysis is required of the areas proposed to be rolled back to ensure robust and evidence based decision making.

Affordability Impacts of Constraining Greenfield Growth

Oyster note that a key component of a well-functioning urban environment under Policy 1 of the NPSUD is a variety of homes that meet the needs of different households in terms of type, price and location. The draft FDS however, has not addressed the affordability impacts of the proposal to constrain greenfield growth. Oyster submit that further analysis is required to address housing affordability.

Process Issues

Oyster is highly concerned that there has been limited engagement with the development sector to develop the FDS. Engagement with the development sector is fundamental in obtaining empirical real-world evidence on feasibility that can sit alongside more theoretical development capacity and feasibility analysis. Input from the development sector would assist the Council. Furthermore, adopting the FDS by September 2023 provides limited ability to make meaningful changes in response to feedback received from the community or development sector alike.

The process for public engagement and decision making on the draft FDS only provides limited opportunity for public input when compared to the process followed by other cities. For instance, in Christchurch there has been significantly more opportunities for public input with a more robust and fair process for considering submissions. In particular:

- The public was asked to complete an online survey on how they thought the Greater Christchurch partnership should tackle important issues such as building greater resilience to a changing environment, meeting our emissions reduction targets, preserving and enhancing our cultural and natural environments, creating liveable and healthy urban areas, and supporting the delivery of housing to improve affordability. More than 7,000 people responded to the survey and this informed the development of the draft Greater Christchurch Spatial Plan;
- Public submissions on the draft Spatial Plan will be considered by an independent hearings panel to ensure a more open, transparent and fair process; and
- 4-6 months have been set aside from the close of submissions to adoption of a final plan to enable meaningful consideration of public submissions. In Auckland only two months has been set aside.

The NPSUD requires that the FDS is completed in time to inform the 2024 Long Term Plan. This does place a constraint on the Council for completing the draft FDS, however, given the concerns expressed above, there are a range of options that the Council could implement that would provide sufficient time to complete a legally compliant and robust FDS for Auckland that meets the Council's other obligations. These options include:

- Progressing the 2024 Long Term Plan on the basis of the current Auckland Development Strategy and 2017 Future Urban Land Supply Strategy; and
- Once the FDS is adopted, progressing any updates to the Long Term Plan via the Annual Plan process for minor changes, or via a Long Term Plan amendment if the changes are more significant; or
- Requesting that the Government grant an extension to the Long Term Plan timeframes for adoption, which has been done previously in other cities.

Reasons for Relief Sought

The amendments sought are to ensure that the FDS achieves a well-functioning urban environment and provides for sufficient development capacity. These amendments are summarised below with specific amendments set out in Attachment A to this submission:

a) Specify how the FDS achieves sufficient development capacity as set out in Section 3.2 and 3.3 of the NPSUD;

b) Provide further analysis of feasible and realisable development capacity on a sub-regional basis to inform the adopted growth scenario;

c) Provide further analysis of location and sufficiency of business land on a sub-regional basis to inform the adopted growth scenario;

d) Provide further analysis of the scale of intensification across the region taking a conservative approach to natural hazards;

e) Within the context of (d) above, provide further analysis as to whether the greenfield growth assumptions are correct and take a broader view, assessing areas beyond the current Future Urban zone extent;

f) Provide more detailed spatial analysis to ensure a robust evidence basis for any proposed roll back of future urban land;

g) Provide further analysis to address housing affordability; and

h) Delay the adoption of the FDS to enable meaningful engagement with the community and development sector.

Decision Sought and Hearing

In addition to the specific relief above, Oyster seeks such other alternative or consequential relief to give effect to the matters raised in this submission.

Oyster wishes to be heard in support of its submission. If others wish to make a similar submission, Oyster will consider presenting a joint case with them at the hearing.

[redacted]

Nick Roberts, Barker & Associates Ltd
(Person authorised to sign on behalf of submitter)

Date: 31 July 2023

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[redacted]

Attachment A – Specific Amendments Sought:

Amendment Sought – Section 2.3.1

Section 2.3.1 outlines the issues associated with spatial planning in an uncertain and changing environment. Regardless of this the FDS states that planning for growth is important as existing housing shortfalls and resilience issues are addressed. This section should be amended to also include reference to where people want to live. Planning for growth in areas that the public find undesirable to live in is pointless and will do little to address shortfalls in housing. Policy 8 of the National Policy Statement on Urban Development requires local authorities to be responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments.

Amendment Sought – Section 2.3.4

Section 2.3.4 outlines the issues of investing in infrastructure in a financially constrained environment. It is understood that Council has financial constraints which are negatively impacting infrastructure provision. However, the solution is not to somehow try and stop growth particularly in greenfields development for a decade. It seems Council is working from a premise that only the Council can fund infrastructure, rather than looking at mechanisms to assist in the sustainable funding and delivery of infrastructure. The only way to solve infrastructure is through partnership with the development community. A more agile rather than restrictive strategy is called for. Amendments to this section to refer to alternative funding options including Crown Infrastructure Partners (CIP) and any other options or partnerships to deliver infrastructure should be included, including Public Private Partnerships (PPP's) should be made.

Amendment Sought – Section 2.4.2

Section 2.4.2, which deals with developments needing to achieve quality living environments also needs to be amended so that the last paragraph includes the words 'balanced with greenfields development'

Amendment Sought – Section 2.5

Section 2.5 sets out the Principles for Growth and Change. These are key to directing the form that growth will be governed by. This section identifies the "*universal ways of accommodating growth, applicable Tāmaki Makaurau-wide, no matter what scale or spatial environment is considered".* These principles are:

- *Support greenhouse gas emission reduction*
- *Adapt to impacts of climate change*

- *Make efficient and equitable infrastructure investments*
- *Protect and restore the natural environment*
- *Enable sufficient capacity for growth in the right place at the right time*

The submitter supports the approach of basing the growth of the Auckland region off key principles. However, the key principles require amendment to allow for appropriately located greenfield growth opportunities. While the Council constraints on infrastructure are recognised, the key principle for growth related infrastructure should be to invest in the provision of infrastructure to meet the social and economic needs of Auckland. It is about infrastructure being an enabler of housing, community and economic development; rather than constraining growth due to infrastructure. There obviously needs to be a balance. What that balance is needs to be worked through. However, the key principles of the FDS should start from the premise of infrastructure as an enabler of growth.

The submitter considers that changes to the principles are required as follows.

Principle 1(a) Amend to: *Intensify the existing urban areas and ~~limit~~ provide for further urban expansion in appropriate locations.* The associated text should also be amended to acknowledge that well planned urban expansion can result in more people living closer to their places of work which results in a greater percentage of intrazonal trips which results in less greenhouse house emissions. Often greenfield development now includes more intensive forms of development (e.g. apartments, terrace houses) as opposed to standalone dwellings. Therefore, greenfield development can achieve the same typologies and therefore greenhouse gas emission efficiencies as urban intensification. Alternative approaches to reducing greenhouse gas emissions should also be identified in the principles, including forest sequestration, identification and protection of areas of land to offset emissions and technology improvements. It is also noted that this principle is not supported by Council's own analysis on carbon emissions. See the Growth Scenarios Evidence report which shows little difference between the extent to which scenarios impact carbon emissions[3].

The final paragraph of this principle should also be amended to:

Growth in rural areas will be ~~minimal~~ limited to appropriate greenfields development and rural and coastal settlement expansions to retain the rural environment and rural productivity.

Principle 1(c) This principle states that Wairau Park is a hub of employment and will likely grow and adapt over time as they respond to market conditions and new opportunities. Wairau

[3] Future Development Strategy – Growth Scenarios Evidence Report pg 5-6

Park has been an area of significant flooding anytime there is a heavy rainfall event and if anything growth should be restricted in this area until flooding issues are resolved. This is an example of where the FDS should be put on hold until PC78 is resolved rather than progressing with a strategy based on incomplete information.

Principle 2(a) should be amended to state: "Avoid further growth in areas exposed to significant risks from natural hazards and promote resilient design solutions" to align with the RMA requirements.

Principle 3 — Add a new principle 3(d)

Support alternative approaches to funding and delivery of infrastructure including for example Crown Infrastructure Partners, Public Private Partnerships, Central Government, the Infrastructure Funding and Financing Act 2020 and other whole of life funding options.

Principle 5(a) — The principle states that the FDS is to direct where and when growth is appropriate. The principle also states that the direction by the NPSUD (Policy 8) to provide for out of sequence or unanticipated growth makes it hard to have an informed estimation of where and when growth is likely to happen. That is the exact reason why policy 5(a) is fundamentally flawed as Council cannot know exactly where and when growth will occur. It cannot predict residential lifestyle patterns over the next 30 years. The best it can do is to ensure that a variety of options are available including intensification and appropriate greenfields development including expansion of rural and coastal settlements. Principle 5(a) should be amended as follows:

Principle 5(a): Provide for growth through intensification and appropriate greenfields development including expansion to rural and coastal settlements. ~~Direction for where and when growth is appropriate~~

Legislation requires the council to enable greater density over wide areas of urban Tāmaki Makaurau as well as being 'responsive' to unanticipated or out-of-sequence development. ~~This makes it hard to have an informed estimation of where and when growth is likely to happen.~~ It is a challenge ~~harder~~ for the council, infrastructure providers and communities to plan for growth proactively, particularly planning for the longer term. Unanticipated or out-of-sequence development will need to demonstrate they can fund and deliver the required infrastructure, will add significantly to development capacity and establish a well-functioning urban environment. ~~create major funding challenges for the council. It can also mean that planned projects in existing communities are deferred or cancelled.~~

~~*The council has limited tools to help direct growth. This makes it even more important to have a strong basis for decision making.*~~

The council's ~~prioritisation~~ rationale to support growth and change will be based on a location's accessibility to jobs and services via public transport and active modes, and availability of facilities, amenities and services to meet day-to-day needs. This will be evaluated against the level of benefits realisation possible from infrastructure and service investment.

The approach emphasises the importance of most growth occurring within existing urban areas. In support of this, future urban areas will be sequenced, with this sequencing linked to triggers dependent on when all the required bulk infrastructure can be provided. Out of sequence growth can be considered where required infrastructure can be demonstrated to be funded and delivered through alternative mechanisms, will add significantly to development capacity and well-functioning urban environments can be established. Consideration of the trade-offs and costs that might occur when development occurs out-of-sequence, ahead of existing priorities, will be applied.

Principle 5(c) This principle addresses the quantum of housing and business capacity required over the next 30 years. Unfortunately, this principle is based on plan-enabled capacity and fails to address clauses 3.2 and 3.3 of the NPSUD as there is no assessment of infrastructure ready or feasible and reasonably expected to be realised land and therefore housing and business capacity under these scenarios. Therefore Principle 5(c) needs to be re-written to address these measures. Section 3.3 Development Capacity of the FDS also needs to be re-written to address these scenarios. In particular amend the last paragraph as follows:

"The approach will be that, where ~~plan enabled~~ capacity is ~~reduced or constrained~~, not delivered in line with our projections, ~~over time~~ this forgone capacity will be offset by creating additional capacity in good locations elsewhere, so that sufficient development capacity is provided at all times to meet demand. This will be reported through quarterly monitoring ~~overall capacity is broadly maintained~~."

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Urban & Environmental

Future Development Plan 2023 #8556

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 submission.

Accessible local centres

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

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

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

Other

Tell us why

Avoiding hazards

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

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

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

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

Other

Tell us why

Please see attached submission

Resilient infrastructure

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

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

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

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

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 submission

Supporting Growth: Response to proposed Dairy Flat Future Urban Areas and Future Transport Projects

[redacted]

14:17 ☆

Reply Reply all Forward Delete Blacklist ☰

[redacted]

To Whom it may concern,

Auckland Council, under the new Future Development Strategy (FDS), has two options;
expansion into future urban zones or growth through intensification within existing city zone boundaries. Under the later, there is no need for any protection of transport routes.

The council is currently reviewing and investigating the proposed plan for Future Urban Areas. The scope of Dairy Flat investigations include infrastructure, wastewater, emissions, urban form and business land retention, and natural hazards, including floodplains and slope instability in areas. Dairy Flat is not planned for future development till 2050.

Until this investigation has been completed and reviewed by council there should be NO further progress on any NoR's for transport Projects, as the may not be needed at all.

The main issues that [redacted] and I have are, the significant impact it will have on the flora, fauna, noise and emissions. Dairy Flat is a country area with farms and some beautiful homes that have been built to enjoy all of these things which would be taken away.
The proposed development for Dairy Flat is not even planned till 2050, if it goes ahead at all, and lodging NoR's on a significant number of residential homes is completely unfair, and will create unnecessary hardship for the home owners. To be on hold for 27years and then they not even be needed is totally unacceptable in our view.
There are already three main north/south arterials in the area; Dairy Flat Highway, East Coast Road and State Highway 1. We believe that creating another transport corridor rather than expanding and improving the existing ones seams outrageous considering how close they all would be to each other, not to mention the considerable cost.

[redacted]

Future Development Plan 2023 #8557

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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

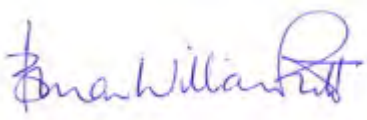
as intended by the Health Act 1954. This requires the separation of wastewater and stormwater systems and the provision of an overland flow path plan for St Marys Bay.

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

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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.

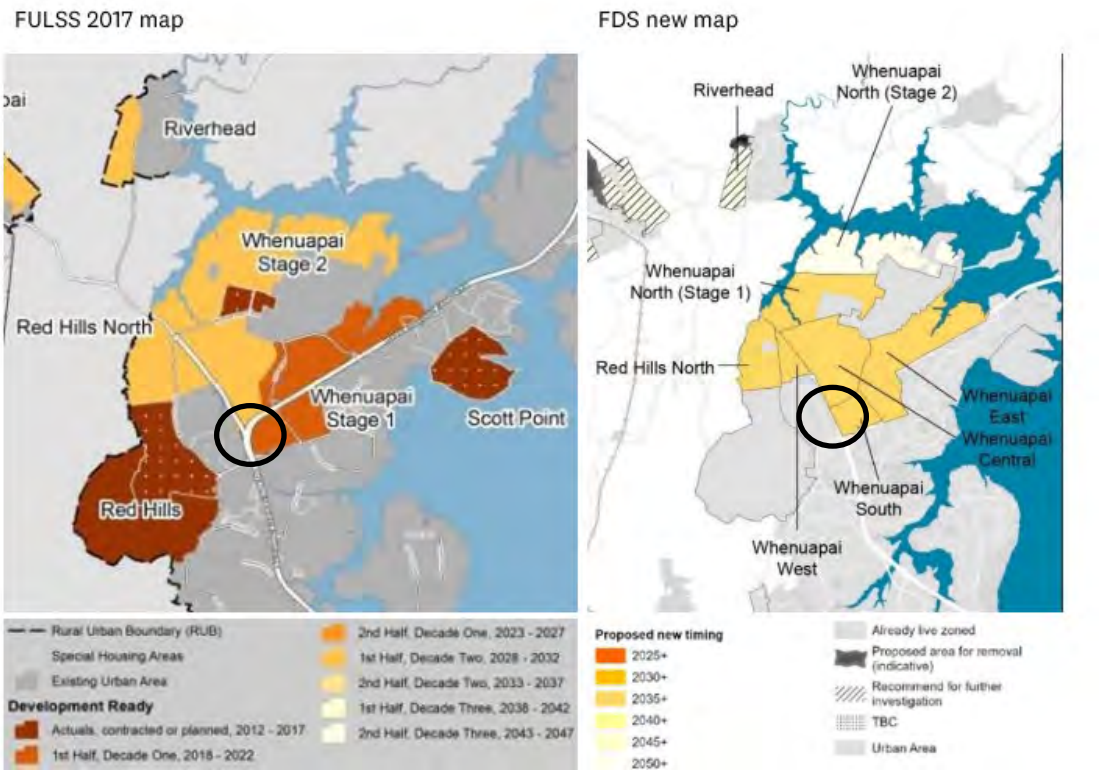
12. CDL has been extensively involved in planning processes that affect its land in Whenuapai, from the development of the AUP, the Whenuapai Structure Plan in 2016, throughout Plan Change 5 to the AUP and more recently in considering potential variation to PC5 and the implications of Plan Change 78 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.

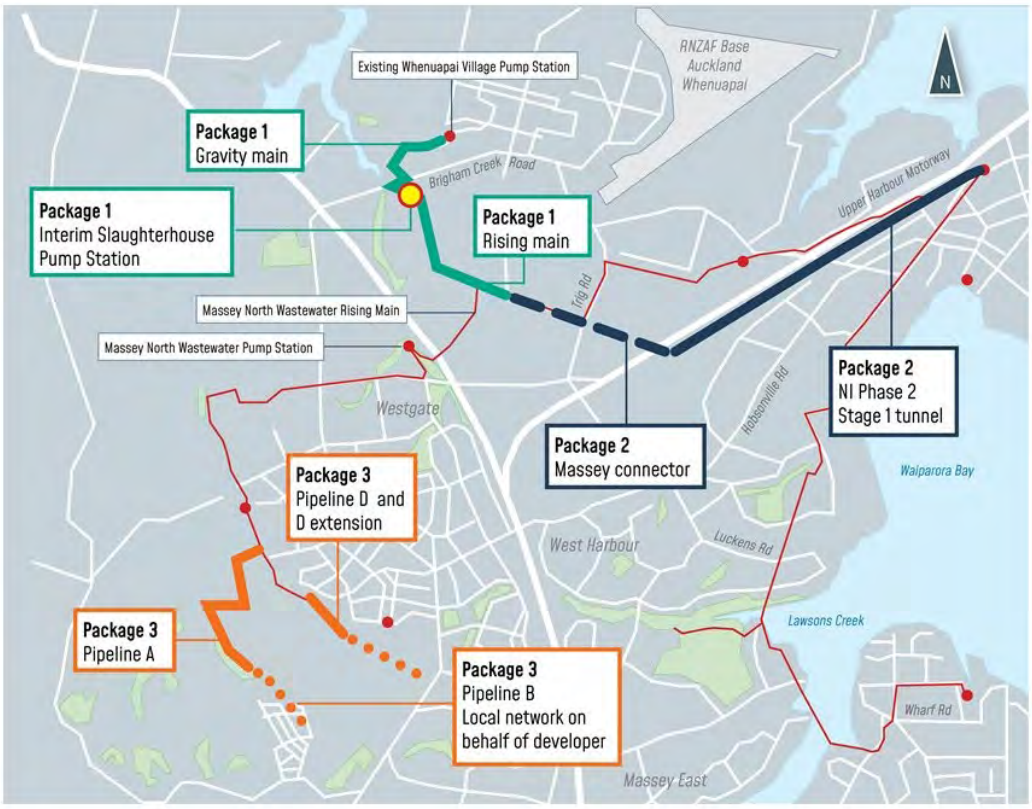
68. In summary, Mr Crang identified in 2018 that existing water supply infrastructure runs along Trig Road and a bulk supply point is located at the Trig Road / Hobsonville Road intersection. Watercare confirmed at that time that the reticulated water supply had sufficient capacity to service the area. 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.

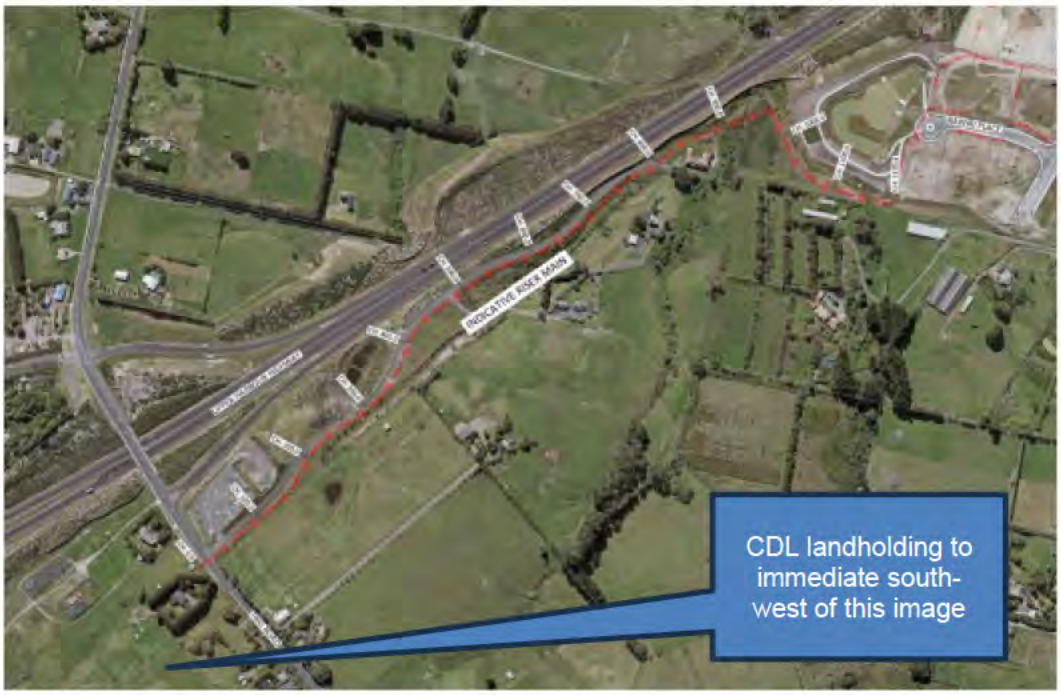
Figure 3 – Whenuapai and Redhills wastewater scheme



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

#8558

UNDER	the Resource Management Act 1991
IN THE MATTER	of Proposed Plan Change 5 - Whenuapai to the Auckland Unitary Plan (Operative in Part).

STATEMENT OF EVIDENCE OF VAUGHAN PAUL CRANG ON BEHALF OF CDL LAND NEW ZELAND LIMITED

DATED 19 April 2018

1. INTRODUCTION

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 ("**CDL**") 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 ("**PC5**").

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 ("**AUP**"). 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. EXECUTIVE SUMMARY

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.

3. CIVIL ENGINEERING MATTERS

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. CONCLUSION

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.

VAUGHAN PAUL CRANG

19 APRIL 2018

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
Senior Planner
[redacted]

#8558

31 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

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 broad 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:	Ellper Holdings Limited
Property or Interest Affected by the FDS:	[redacted] and [redacted] Wellsford

Address for Service

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

Property Details

The submitter has a particular interest in the land at [redacted] and [redacted] and [redacted] and [redacted] Wellsford (legally described as Allot 126 PSH of Oruawharo, Lot 1 DP 41865, Part Lot2 DP 41865, Part Allot M125 PSH of Oruawharo, Part Allot E125 PSH of Oruawharo, Part Lot 3 DP 84140, Lot 4 DP 84140). Refer to the aerial photograph in Figure 1 below.



Figure 1– Aerial Photograph showing subject sites (source: GRIP 31/07/2023)

The land is zoned a mix of Rural - Countryside Living , Future Urban and Residential – Single House under the Auckland Unitary Plan – Operative in Part (AUP-OP). Refer to Figure 2 below:

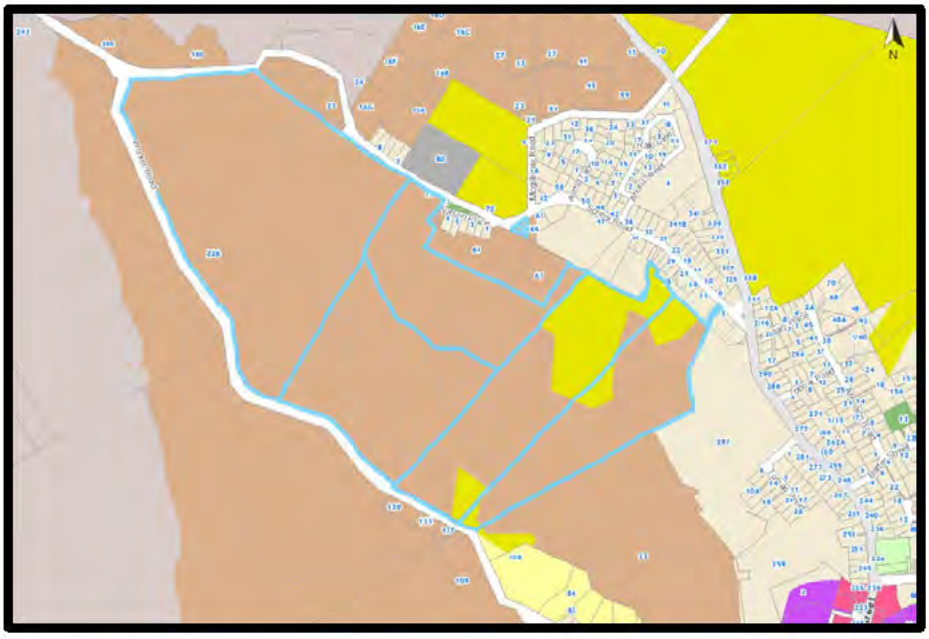


Figure 2 AUP-OP Map showing location of subject sites (31/07/2023)

The submitters' land is strategically located within the Wellsford town centre being directly adjacent to both the primary, intermediate and secondary schools. The stream and bush network through the centre of the site provides the ability to establish a reserve network providing for walking and cycling connections into the town centre. The land is confined within the bounds of two roads, namely Worker Road to the south and School Road to the north. The roads provide a defensible boundary for urban development with Worker Road and School Road providing a buffer to the Rural – Countryside Living zoned land on the opposite sides of these roads. Essentially the submitters land is the missing piece of

the puzzle in terms of the urban extent of Wellsford. Developing the submitters land as per its Rural – Countryside Living zoning this would be an inefficient use of a primely located area of land and would be a lost opportunity in being able to create a well-functioning urban environment for Wellsford.

The submitter and their consultant team are preparing a proposed plan change seeking to rezone the land as a mixture of Residential – Single House Zone and Residential – Large Lot Zone (with a minimum site size of 2,500m^2) with an extensive reserve network proposed through the middle of the land and underneath the high voltage power lines that run through the sites. A church is proposed on the land opposite the cemetery on School Road and a retirement village is proposed on the land adjacent to School Road to the west.

The Future Urban Land Supply Strategy 2017 (FULSS) showed the Future Urban zoned areas within Wellsford as being development ready in the 2nd half of Decade one, 2023-2027. See Figure 3 below:

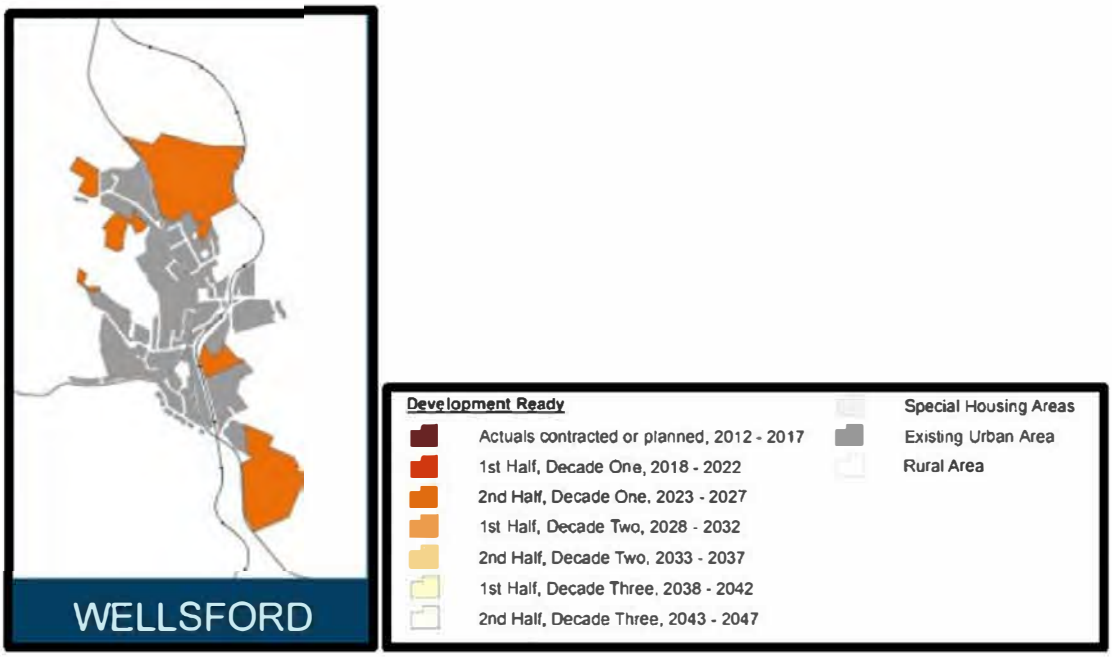


Figure 3– Map showing zoning of Wellsford under the Future Urban Land Supply Strategy and associated legend (Auckland Future Urban Land Supply Strategy 2023-2053, July 2017)

Wellsford

Wellsford is located less than 20mins north of Warkworth.

It is a major regional centre, being located at the junction of State Highways 1 and 16, almost halfway between Auckland and Whangārei. It is on the North Auckland Line railway, which has been goods-only since the last regular passenger service ceased in 1975. It is the rural service town for the local areas of Tauhoa, Tapora, Wharehine, Port Albert, Te Hana, Tomarata, Te Arai, Whangaripo and Pakiri.

Wellsford is described by Statistics New Zealand as a small urban area. It covers 4.55 km^2 and had an estimated population of 2,250 as of June 2022, with a population density of 495 people per km^2. Wellsford had a population of 1,929 at the 2018 New Zealand census, an increase of 216 people (12.6%) since the 2013 census, and an increase of 258 people (15.4%) since the 2006 census. It is clearly growing.

Rodney College is a secondary (years 9-13) school with a roll of 339 students. Wellsford School is a primary and intermediate (years 1–8) school with a roll of 368 students. Wellsford, Tauhoa, Pakiri, Tapora, Tomarata and Mangawhai Primary Schools all cater for students from year 1–8, and collectively contribute to the annual intake of roughly 80 year 9 students at Rodney College.

Wellsford also contains a number of other community facilities including but not limited to:

- number of childcare facilities
- community centre
- medical centre
- library
- Golf course and club
- Squash Club
- a range of industrial and commercial facilities

The Warkworth to Wellsford project is the second section of the Ara Tūhono Pūhoi to Wellsford Road of National Significance, to be delivered by the NZ Transport Agency. It travels west of Warkworth and east of both Wellsford and Te Hana, connecting back into the existing State Highway 1 north of Mangawhai Road. It is understood that this project will be implemented within the next decade although the National Party have indicated funding for the project and an implementation timeframe of 4-10 years.

The last structure plan for Wellsford was undertaken some time ago – early 2000's.

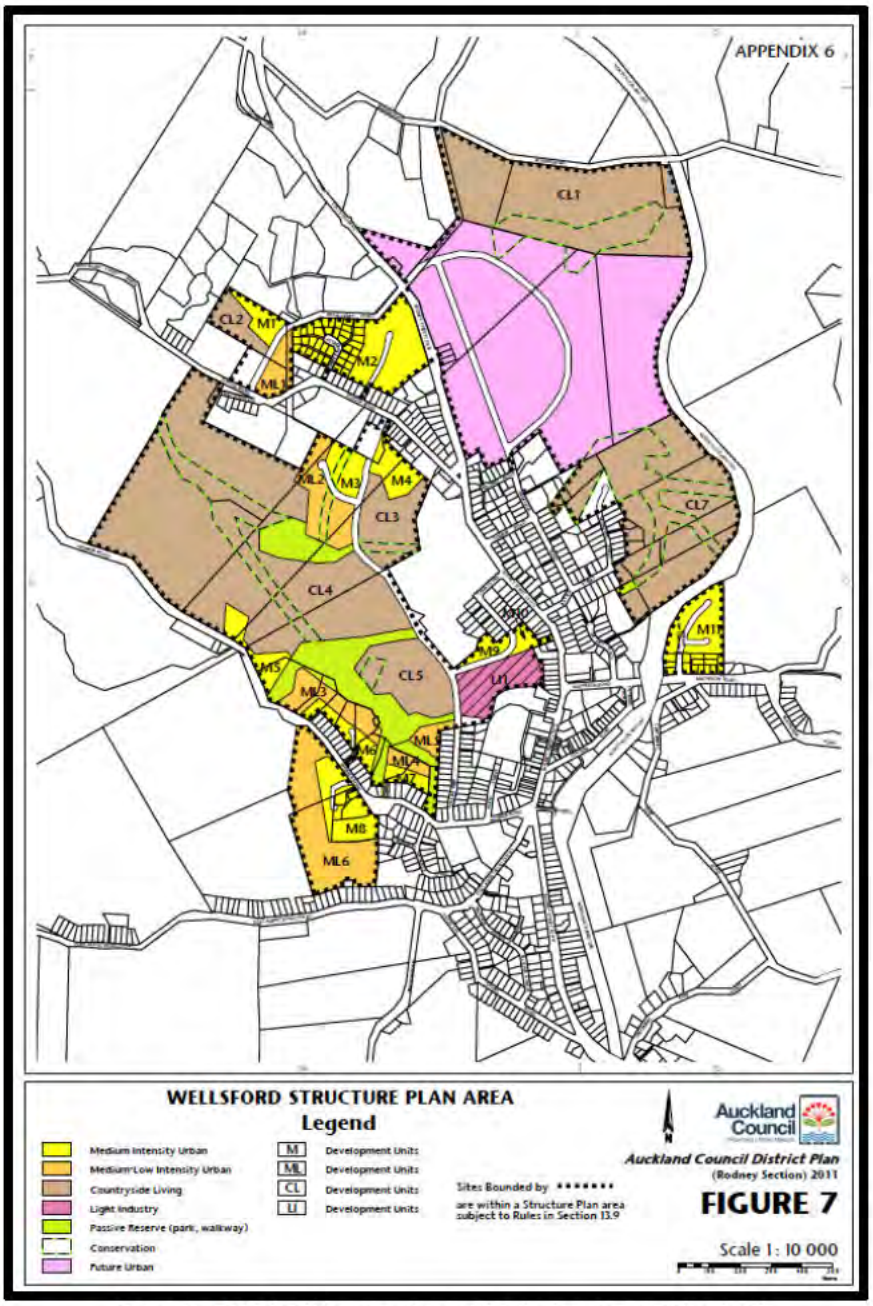


Figure 4 – Wellsford Structure Plan within Rodney District Plan 2000

This structure plan informed the existing Future Urban zoned areas of land located on the submitters site. The zone boundaries do not follow any sort of topographical or defensible boundary. Given the existing and future changes that Wellsford is likely to experience, it is essential that the extent of urban land within Wellsford is reconsidered to ensure that it provides a well-functioning urban environment for both existing and future residents. This includes consideration as to whether additional Future Urban land is required to cater for the projected population growth for Wellsford.

It is noted that Plan Change 78 was an opportunity for Auckland Council to consider the urban form at Wellsford; Auckland Council did not take up this opportunity. The submitter has lodged a submission on Plan Change 78 seeking urban zoning is applied to all of the submitters land identified in Figure 1 above. A copy of this submission is included as **Attachment 1**.

Future Development Strategy - Wellsford

The Future Development Strategy has not considered whether any further Future Urban land is required at Wellsford despite this matter not having been given any consideration since the early 2000's. Auckland Council's own evidence to the Auckland Unitary Plan on future growth at Wellsford recognises that the urban extent of Wellsford would need to be looked at if the Warkworth to Wellsford section of SH1 was to be implemented. [1]

Further, the FDS seeks to delay the timing of urbanisation on Future Urban Land at Wellsford until 2030+ - see below:



Figures 5 – Map showing proposed timing of Wellsford under the proposed Future Development Strategy and associated legend (Overview Document Auckland Future Development Strategy 2023-2053, June 2023)

The above is despite the wastewater and water treatment plants in Wellsford being upgraded and operational in Decade One. Further the FDS shows Ara Tuhono project (Warkworth to Wellsford) as being undertaken in Decade Two. The National Party have indicated that if they are elected that the Warkworth to Wellsford state highway improvements will start within the next four to 10 years.[2]

[1] Statement of Rebuttal Evidence of Ryan Bradley on behalf of Auckland Council – Topic 16 RUB North/West – 17 December 2015.

[2] National unveils transport policy: Four-lane motorways from Whangārei to Tauranga, described as 'laughable, misleading' by Labour- NZ Herald

Road network projects *

Decade One (2023+)	Decade Two (2033+)	Decade 3 (2043+)

• Penlink
• Ara Tūhono project (Pūhoi to Warkworth)
• The Papakura ki Pukekura - Papakura to Bombay project (Stage 1 Papakura to Drury)
	• Ara Tūhono project (Warkworth to Wellsford)
	• State Highway Improvements (north)*
	  ○ SH1 widening (between Lonely Track Bridge and Silverdale interchange)
	  ○ Silverdale Interchange upgrade
	  ○ Wilks Road interchange
	  ○ Upgrade to Redvale interchange (upgrading the proposed Ō Mahurangi Penlink interchange)
	• Waitematā Harbour Connections
	• SH16 & SH18 Upgrades
	• Drury to Pukekohe Corridor
	• Mill Road*[1]
	• The Papakura ki Pukekura - Papakura to Bombay project (Stage 2)
	• East – West Link
		• Mill Road
		• State Highway Improvements (north)*

Wastewater projects*

Decade One (2023+)	Decade Two (2033+)	Decade 3 (2043+)
• Warkworth Wastewater Growth Strategy • North East Sub-regional wastewater servicing • Wellsford Treatment Plant upgrade • Western Isthmus Programme • Central Interceptor • Southern Auckland Wastewater Service Scheme • Drury West transmission sewer • Paerata transmission wastewater pumpstation • Pukekohe Treatment Plant capacity • South-west wastewater upgrade	• Army Bay wastewater treatment plant upgrade • Hibiscus Coast wastewater network improvements • Rosedale Treatment Plant capacity • Northern Interceptor Phase 2 • Whenuapai and Redhills wastewater scheme • Helensville wastewater treatment plant upgrade • Māngere treatment plant capacity • Pukekohe treatment plant capacity • Southern Interceptor Augmentation Stage 2 • Beachlands Maraetai servicing	• Army Bay treatment plant capacity • Māngere Treatment Plant capacity

Water supply projects*

Decade One (2023+)	Decade Two (2033+)	Decade 3 (2043+)
• Tamaki regeneration and Kainga Ora water network upgrades • Wellsford water treatment plant upgrade • Ōrewa 3 watermain • Brigham Creek pump station Whenuapai Redhill package 1 • Huia water treatment plant • Redoubt Road reservoir expansion • Hingaia watermain enhancement – Southern Auckland • Drury South resilience watermain • Waikato A water treatment plant	• Waitākere 2 watermain • Helensville water treatment plant upgrade • Trig Road reservoir • North Harbour 2 watermain project • Reservoir storage capacity • Waikato treatment plant capacity	• Warkworth water supply capacity • Waitematā Harbour Connections (watermain) • Ardmore water treatment plant upgrades

The submitter and The Planning Collective met with Watercare in June 2023, and we were advised that if Council agrees to the urbanization of the land in question, that Watercare would be willing to work with the submitter to provide for wastewater treatment and disposal as well as water supply and that in fact such a proposal had good timing given that Watercare are currently at the design phase.

Generic 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, as a minimum, to the urban environments of Tier 1 and 2 Local Authorities and can apply to a wider area. Despite this, the FDS has failed to look at the urban extent at Wellsford.

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.*

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 states that the effect of the FDS 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.

Consultation and Engagement:

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

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 of the FDS is set out above namely to achieve well-functioning urban environments in existing and future urban areas now and over the long-term.

The FDS has been prepared in isolation without adequate consultation with the development community, mana whenua, infrastructure delivery partners and funding providers. The FDS is such a critical tool for the next 30 years, having a huge implication on:

- housing affordability,
- land supply,
- economic development,
- employment land and the economic viability of the development sector,

that it is essential that any drafting of the FDS is a fully researched, worked through and tested strategy prior to adoption.

Well-Functioning Urban Environment:

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.

The FDS provides Auckland Council an opportunity to reinforce and refine the existing growth strategy set out in the Unitary Plan, in order to address the existing process delays and underinvestment in growth-supporting infrastructure. Instead, Council is using their current 'financially constrained environment' and 'uncertain future' as reasoning to create further market uncertainty and consequently slow the uptake of development capacity. This is the direct opposite outcome from what is required or sought through the NPS-UD.

The FDS is also an opportunity to provide a clear strategy for the short-medium term growth (or at least for a 6-year outlook to align with each FDS review) requirements of Auckland and provide a pathway for a more ambitious and opportunistic strategy for the long-term growth. Instead, Council has chosen to set a vague *vision* for the built environment of Tāmaki Makaurau, Auckland, which is [emphasis added]:

> *Auckland's built environment will underpin the development* ***of prosperous, inclusive, and vibrant communities****. Quality development will help to regenerate the environment and deliver our commitments to* ***greenhouse gas emission reduction*** *as we grow and change.*

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 HBA and preference for ad-hoc infill developments 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 medium to 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.

It is generally understood that Auckland Council's projects will be funded by ratepayers, DCs and IGC's and in some cases with government funding where there are national or cross-regional benefits. Even given these available financial tools, Council has not taken advantage of the opportunity to be more strategic and ambitious with its long-term infrastructure strategy.

Ellper Holdings Limited requests that the FDS recognises and reinforces the significant role of Future Urban areas (for Auckland, the "Future Urban Zone" (FUZ)) 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.

Specific issues that are contrary to Clause 3.13 of the NPS-UD:

1. The FDS in its current form cannot *promote long-term strategic planning (clause 3.13(a))* because:

    a) The FDS has misconstrued growth in some Future Urban zoned areas as 'expansive' urban form and not 'compact', despite this zoning being established through the Unitary Plan process, which has a policy framework that requires a quality compact urban form to be realised. In doing this, Council have not acknowledged (and undermined) the significant role that well-planned future urban areas in greenfields and around existing rural settlements can provide to improve functionality and connectivity within and between existing urban environments, and the self-sufficiency of existing remote settlements. The FDS provides a unique opportunity to consider where urban development should most appropriately occur on a region-wide basis, unconstrained by the approach that was taken/future development areas that were identified by legacy Councils, who did not have the luxury of taking a "region-wide" view as we do now. Ellper Holdings Limited strongly considers that in order to properly achieve the requirements of the NPS-UD, that opportunity must be properly utilised.

    b) The FDS proceeds on the assumption that the only way of reducing car dependency and vehicle kilometres travelled is to promote intensification and preclude urban expansion. That assumption is incorrect. There is clear evidence that quality greenfield development can be undertaken in a way that minimises residents' needs for private vehicle use. Creating thriving town centres in these areas, with good active mode/public transport networks and high value employment opportunities, means these developments can also support (and therefore reduce the private car dependency of) neighbouring areas that currently do not have such services.

2. The FDS in its current form cannot provide certainty that there is *at least sufficient development capacity for housing and business land, as required by clauses 3.2 and 3.3 (clause 3.13(a)(ii))* because:

    a) Council's updated (current) HBA is still in draft form.

b) Plan-enabled dwelling and business land capacity needs to be commercially feasible and infrastructure-ready to be realised. In many cases, small-scale infill developments will become commercially infeasible if the developer must bear the upfront costs of bulk infrastructure upgrades on top of increasing land values and construction costs. Simply such projects will not be of sufficient scale to warrant the costs of the infrastructure upgrades required. Alternatively, large greenfield and regeneration brownfield developments in the right locations can build housing and non-residential building at scale and incorporate forward-thinking urban planning to ease the pressure on strained infrastructure systems and social facilities.

c) Council acknowledges that 'take-up will vary' making it difficult to plan for cost-recovery, ring-fence DC's and budget for future projects. The development capacity should be assessed and presented by location and market (type, size, and price) to address existing sub-regional inequities in the accessibility to and distribution of jobs, alternative modes of transport and community facilities.

d) The "command and control" philosophy that the Council has adopted to date, through the existing FULSS has not provided a robust strategy to deliver housing (and associated infrastructure) at the right pace and in the right places. The Council "blames" (and is upset with) the development community/private sector for not following the FULSS, but instead bringing private plan changes ahead of the timing indicated in the FULSS. The Council says this "*has removed any degree of certainty in sequencing and timing of growth and has forced the Council group to become more reactive to ever changing priorities – both in timing of development and the number and spread of areas being live zoned*".[3] However, the reality is that the FULSS was set by the Council, without sufficient consultation or understanding of the current market demands around housing. The same mistakes cannot be made with the FDS – so the Council must understand that the market will not simply abide by and adopt the Council's (generally unpragmatic) preferences around urban growth. Rather, the Council and private sector need to work closely and collaboratively, to establish an FDS/strategic plan that actually works for the community it is supposed to serve, by reflecting the community/market's preferences (not just those of the Council).

Conclusions and Outcomes Sought

To summarise, the approach to development as outlined in the FDS will not achieve the purpose of the FDS, nor is the approach based on sound, 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.

[3] Page 39 of FDS.

In summary, Ellper Holdings Limited requests the following:

- The FDS reinforce and support the significant role of future urban areas, and that Council provides 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.

- Development capacity be assessed and presented by location and market (type, size, and price) to address existing sub-regional inequities in the accessibility to, and distribution of jobs, alternative modes of transport and community facilities, including parks, reserves, and other open space networks.

- The FDS must consider the supply of 'affordable housing' when assessing plan-enabled capacity and development capacity.

- The FDS should reconsider the urban extent at Wellsford and the timing for urbanisation of future urban areas and growth outside the current urban form at Wellsford should be within the time period of 2025+ given the significant investment in infrastructure planned and programmed to occur within the next few years.

- Auckland Council hold a specific hearing process for the FDS submissions (not just invite submitters to speak at an upcoming Council meeting), given the importance of the FDS/submissions. To reiterate, Ellper Holdings Limited wishes to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.

Yours sincerely



[redacted]
The Planning Collective Limited
[redacted]
[redacted]

Attachments:
1 – Ellper Holdings submission to Plan Change 78

Attachment 1:

Ellper Holdings submission to Plan Change 78

#8558

THE PLANNING COLLECTIVE

Form 5

Submission on a notified proposal for policy statement or plan changes or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Auckland Council (via email: unitaryplan@aucklandcouncil.govt.nz)

Name of Submitter: [redacted]

Ellper Holdings Limited could not gain an advantage in trade competition through this submission.

This submission is made on behalf of Ellper Holdings Limited to Auckland Council on the Proposed Plan Change 78: Intensification and Proposed Plan Change 80 to the RPS on Well-functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters.

The specific provisions that this submission relates to are:

- Inclusion of land into the Residential: Mixed Housing Urban zoning where sufficient assessment has occurred to support rezoning of the land because the land is part of the urban environment.
- B2.2
- B2.3.2 (g) and (h)
- B2.4.1 (1)
- B2.4.2 (2), (3), (4) and (5)
- B2.5
- B2.7 – open space and resilience to climate change – many esplanade reserve areas will be subject to the effects of climate change so there needs to be better guidance in the Policy here. i.e., reserves should be vested but then the extent to which they are developed needs to be considered in the context of the effects of climate change.
- B2.9 para 4 – more guidance and detail required in relation well-functioning urban environment
- Any other provisions required to achieve the outcomes sought in the submission.

Scope of the Submission

Section 77F of the Resource Management Act 1991 ('RMA', as inserted by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 ('EHSA')) defines the ***urban environment*** to mean:

"any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

(a) is, or is intended to be, predominantly urban in character; and

(b) is, or is intended to be, part of a housing and labour market of at least 10,000 people."

Section 77G (1) of the RMA requires that *every relevant residential zone of a specified territorial authority must have the MDRS incorporated into that Zone.*
The definition of ***Relevant Residential Zone*** from section 2 of the RMA is:

relevant residential zone—

(a) means all residential zones; but

(b) does not include—

(i) a large lot residential zone:

(ii) an area predominantly urban in character that the 2018 census recorded as having a resident population of less than 5,000, unless a local authority intends the area to become part of an urban environment:

(iii) an offshore island:

(iv) to avoid doubt, a settlement zone

The Auckland Council IPI, 32 Overview Report, states that:

Outside of the Large Lot zone and the Rural and Coastal Settlement zone there are 27 rural towns and villages that have Single House and/or Mixed Housing Suburban zonings.

The policy intent is clear that subpart (b)(ii) of the definition requires the application of MDRS to all settlements with populations over 5,000 and to give councils discretion to apply the MDRS to settlements under 5,000, where the council intends the area to become part of an urban environment.

Council has decided that the discretion to apply the MDRS to smaller settlements (less than 5,000 population) should not be taken up. This is because the smaller settlements are separated from the main urban area, where public transport is limited, and increased density of development will add to vehicle travel distances and associated greenhouse gas emissions.

23 settlements are excluded from the definition of a relevant residential zone, and the incorporation of MDRS

Wellsford had a population of 1,929 at the 2018 New Zealand census. Wellsford is one of the 23 settlements excluded from the definition of a relevant residential zone, and the incorporation of MDRS, by Auckland Council. This is even though Wellsford is part of the residential housing and employment market of Warkworth.

Section 77G(2) further requires that "*every residential zone in an urban environment of a specified territorial authority must give effect to Policy 3 or Policy 5 of the National Policy Statement – urban Development ("**NPS – UD**") as set out in Schedule 3B of the amendment legislation, as the case requires in that zone*."

The definition of ***"Residential Zone"*** within the RMA is "*all residential zones listed and described in Standard 8 of the national planning standards or equivalent zone."*

Standard 8 of the National Planning Standards (2019)[1] includes the following residential zones:

- Large lot Residential Zone
- Low Density Residential Zone
- General Residential Zone
- Medium Density Residential Zone
- High Density Residential Zone

Policy 3(d) of the National Policy Statement for Urban Development (NPS-UD) notes that:

> *"In relation to tier 1 urban environments, regional policy statements and district plans enable:*
>
> *…*
>
> *(d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services."*

The *Proposed Plan Change 78- Intensification (PC78)- Implementation of Policy 3 of the National Policy Statement- Urban Development Section 32 Report*, prepared by Auckland Council, notes that Auckland Council has interpreted the 'urban environment' in the context of Auckland to include "*All land zoned residential, business and adjoining special purpose zones and open space zones as identified in the AUP, including the Hauraki Gulf Island Section, which includes metropolitan Auckland, all towns, and all rural and coastal towns and villages*.[2]"

The Section 32 Report notes that for clarity, the ***'urban environment'*** in Auckland:

- *Includes all urban areas in the region regardless of size that are of an urban character*
- *includes all urban areas that are part of the wider Auckland housing and labour market*
- *includes areas which are zoned for urban purposes, but which are not yet urbanised (i.e., areas intended to be urban in character)*
- *utilises zonings already in the AUP*
- *does not include the Future Urban Zone*[3]

Reasons for Submission:

Site and Surrounding Area

The town of Wellsford sits at the intersection of State Highway 1 and State Highway 16. It is the northern-most town in the Auckland Region. Wellsford is a gateway, with Kaipara Harbour to its west and Mangawhai, Te Arai and Pakiri beaches to the east. It also sits squarely between Auckland to the south and Whangarei in the north.

The Properties comprise approximately 85ha of greenfield land and are situated on the periphery of the existing Wellsford urban area. The Properties have frontage to School Road to the east and Worker

[1] national-planning-standards-november-2019-updated-2022.pdf (environment.govt.nz)
[2] pc-78-section-32-policy-3-intensification (aucklandcouncil.govt.nz) Section 3.2.1
[3] pc-78-section-32-policy-3-intensification (aucklandcouncil.govt.nz) Section 1.1

Road to the west. They are characterised by undulating topography with stands of scattered bush.

We have reviewed the Record of Title for the properties and there are no limitations registered on the Title that would limit application of the MDRS.

The Properties are located a short distance from Wellsford town centre, Wellsford Primary School and Kaipara College. Wellsford is a 15-minute drive north of Warkworth. Refer to aerial photograph in **Figure 1** below:

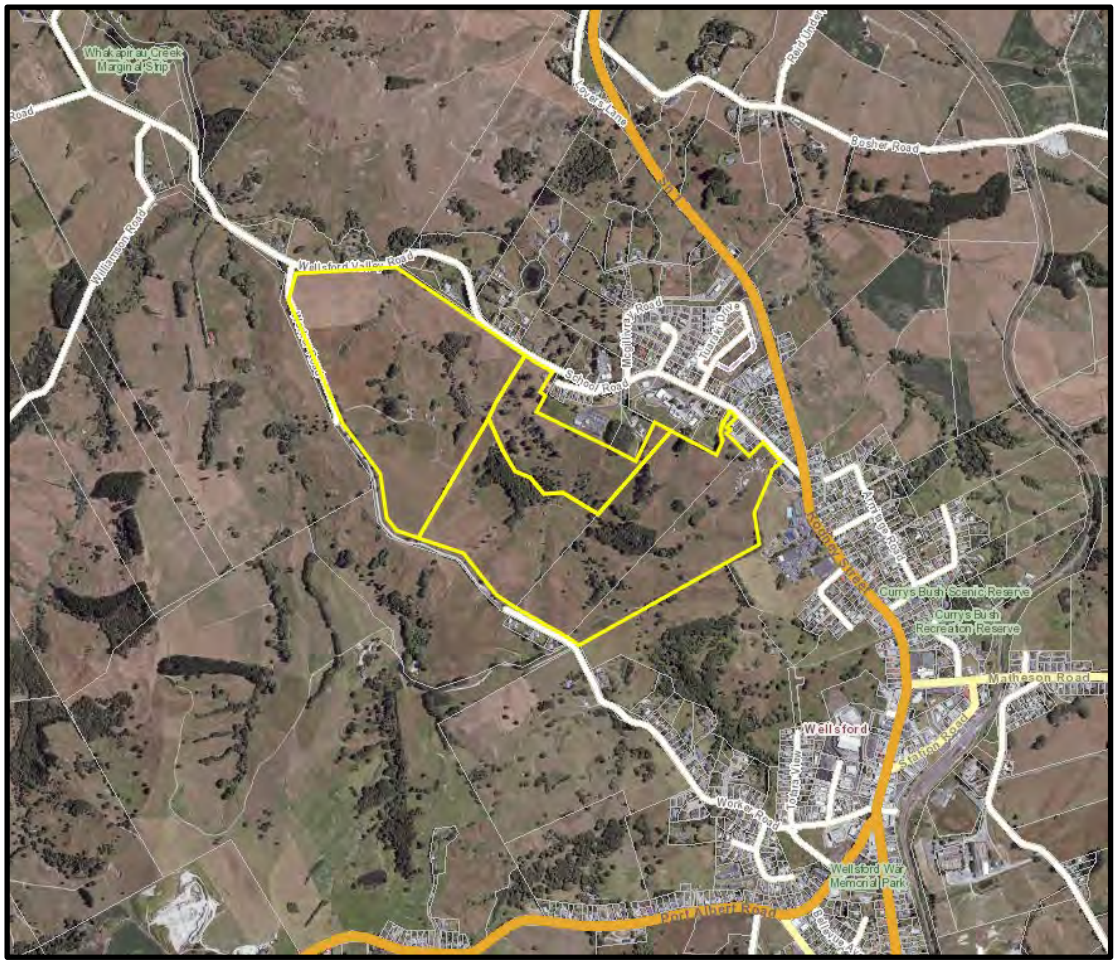


Figure 1: Aerial Photograph of Site and Surrounding Area (Source: Auckland Council GEOMAPS 27/9/2022)

Current Zoning

The Properties are zoned Residential – Single House, Rural – Countryside Living and Future Urban under the Auckland Unitary Plan – Operative in Part (AUP-OP). Refer to Figure 2 and **Attachment 1** for a copy of the AUP-OP planning maps. There are a number of overlays and controls applying to the Properties, namely:

Overlays

- Natural Resources: Significant Ecological Areas Overlay – SEA_T_2248, Terrestrial
- Infrastructure: National Grid Corridor Overlay – National Grid Yard Uncompromised
- Infrastructure: National Grid Corridor Overlay – National Grid Subdivision Corridor

- Infrastructure: National Grid Corridor Overlay – National Grid Substation Corridor

Controls

- Macroinvertebrate Community Index – Rural
- Macroinvertebrate Community Index – Urban
- Subdivision Variation Control – Rural, Wellsford Countryside Living

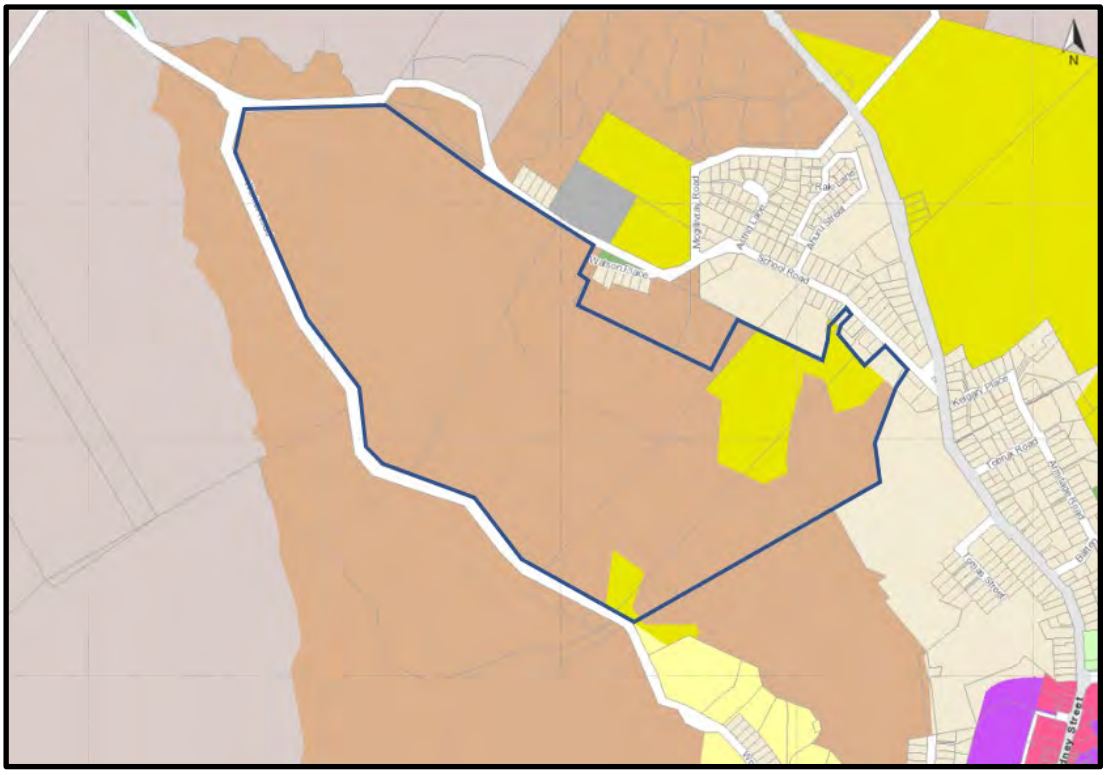


Figure 2: Zoning under the AUP-OP. The sites are outlined in purple.

There are various watercourses which traverse the site and Auckland Council GEOMAPS identify flood plain areas running adjacent to some of these watercourses. A copy of the Auckland Council GEOMAPS with the hydrology layer applied can be found in Attachment 2.

Background

Vision Wellsford sought large scale rezoning in Wellsford through the Auckland Unitary Plan process. It sought that a Future Urban zone be placed on the Properties - see Figure 3 below:

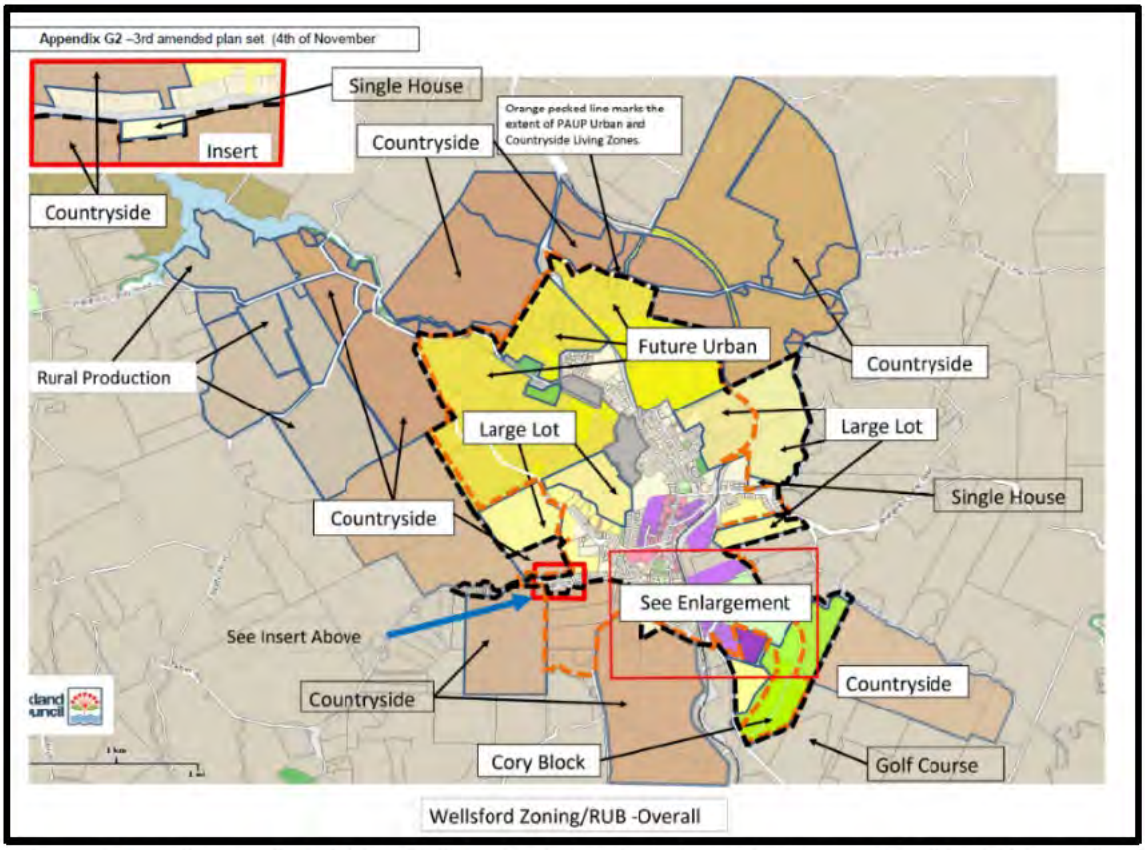


Figure 3: Rezoning sought by Vision Wellsford in their submission to the Proposed Auckland Unitary Plan

Whilst this rezoning was not successful it does signal that there is growth pressure and development plans within Wellsford. It also identifies that there is an intent for the land to be urban.

A review of the Rodney District Plan maps for Wellsford shows that effectively the Unitary Plan rolled over the zoning from the Rodney Plan, except for some further Future Urban zoned land in the south and additional Rural – Countryside Living land. Figure 4 below shows the zoning in Wellsford in the Rodney District Plan 2000:

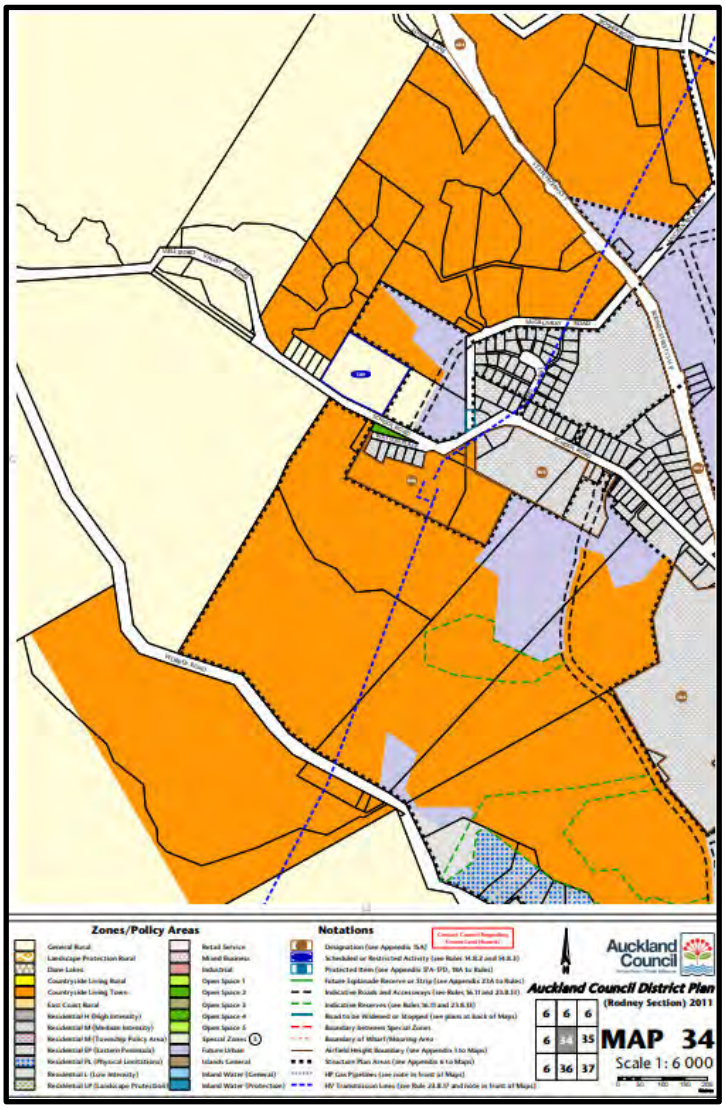


Figure 4: Rodney District Plan 2000 zoning for Wellsford

In addition, there was the Wellsford Structure Plan included within the Rodney District Plan 2000. The spatial development strategy for the Wellsford Structure Plan Area was based on the following:

(a) in the long term, introduce a combined State Highway 1/State Highway 16 bypass to the west of the town;

(b) concentrate residential development only to the west of Rodney Street, with the new north-eastern residential areas not being released for development until the bypass is in place;

(c) limit the further westward expansion of non-rural zonings, so that the alignment possibilities of a western bypass are not unnecessarily compromised;

(d) establish Countryside Living (i.e., lifestyle blocks) in areas with physical land suitability limitations, and where appropriate, in the urban-rural interface;

(e) establish zones of Countryside Living in the valley between Worker and School Roads, and in the northern sector of the study area (on the southern side of Bosher Road);

(f) the northward expansion of the Izard's site, to an extent which does not impact on surrounding land uses.

A copy of the Wellsford Structure Plan is provided in Figure 5 below:

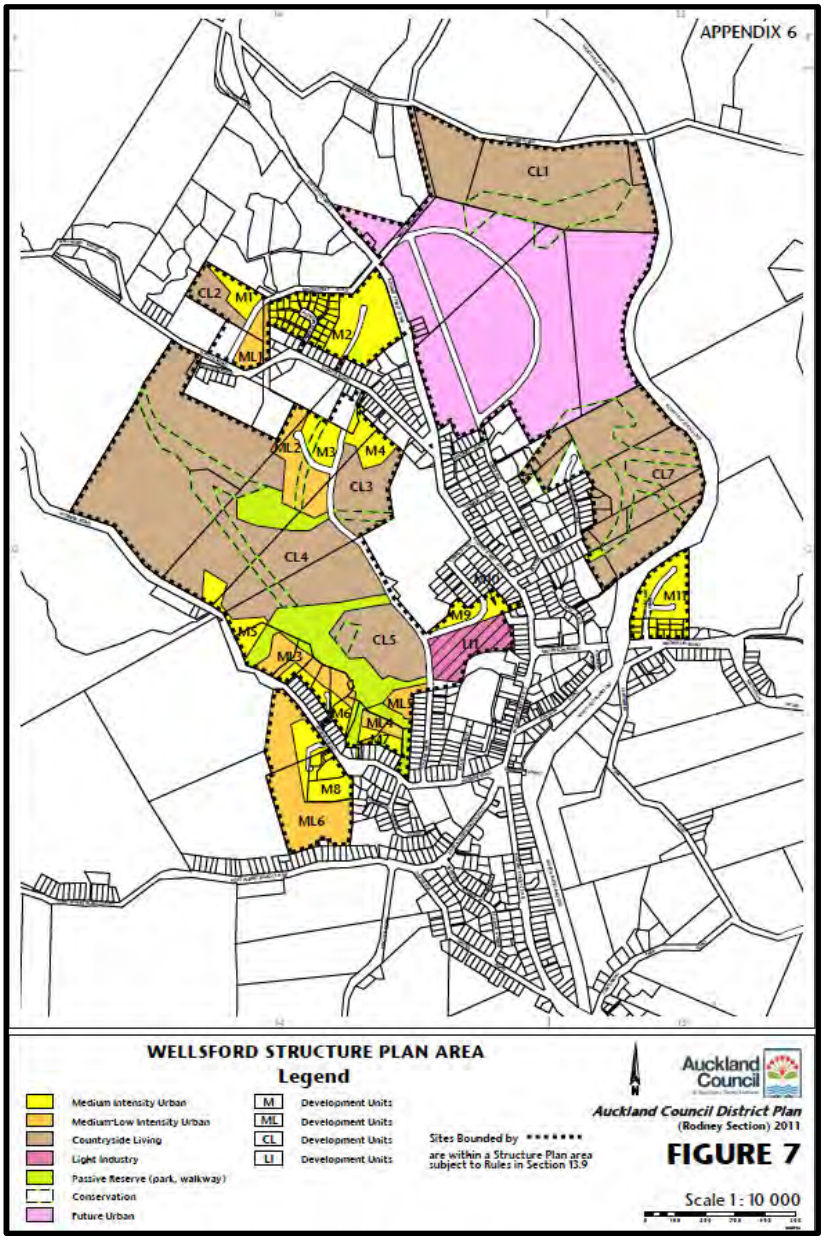


Figure 5: Wellsford Structure Plan from Rodney District Plan 2000

There have also been many planning decisions and outcomes that change the rate and demand for urban growth in the northern part of the region. Notably since the Auckland Unitary Plan hearings process Waka Kotahi has obtained a designation for the extension of State Highway 1 from Warkworth to Wellsford. The new section of State Highway 1 from Puhoi to Warkworth is also nearly complete with the road signalled for opening in 2023.

There is also a planned upgrade of the wastewater system for Wellsford and the rate of growth at Warkworth continues to have an effect on the Wellsford housing market. Many people who work in Warkworth cannot afford to live there and Wellsford provides a source of affordable housing accessible to the labour market. With regard to the upgrade of the wastewater system, the submitter had communications with Watercare in 2021 about this matter and Watercare advised that there are plans

to upgrade the wastewater treatment plan and that the upgrade would be staged to align with development. Watercare also states that they have plans to build a new water treatment plant once they obtain consent for a new water take which should take around a year to obtain.

Planned Development

Given the history outlined above, and assessment and advice from experts about the ability to physically develop the Properties for residential purposes, while managing environment effects, the submitter, our client, is in the process of preparing a private plan change to rezone the Properties to enable them to be developed for urban / residential purposes. They will then seek to apply for subdivision and land use consents to develop the Properties. The Plan Change is due to be submitted early 2023.
There is ongoing demand for residential development within Wellsford with Wellsford providing opportunity the following:

- Affordable housing for first home buyers living between Auckland and Whangarei (noting Warkworth is no longer affordable).
- 'Trade down' housing for empty nesters looking to reduce/clear mortgage but stay within a close drive of Auckland.

Plan Change 78: Intensification

Given the locational characteristics of the Properties, the development that has occurred since its zoning was last considered; it is essential to consider whether the current zoning is appropriate in light of the new legislation. The Unitary Plan was drafted and processed prior to the NPS-UD and the EHSA to enable housing supply and other matters.

As the Properties are greenfields this is even more important as greenfields land generally enables higher residential density to be provided in a more efficient way than infill development, while ensuring environment effects are recognised, managed, and protected, where appropriate, through design.

While Wellsford had a population of less than 5000 at the time of the 2018 census, given its location it can be considered part of the housing and labour market of Warkworth. Warkworth is a satellite town planned to have a population of 20,000 plus by 2040. The Auckland Plan, the Future Urban Land Supply Strategy ("FULSS") along with the extent of Future Urban zoned land identified around Warkworth provides sufficient supply of urban land to support an anticipated population of 20,000 to 25,000 persons in the time period 2010 to 2040. The Adopted Warkworth Structure Plan identifies the anticipated urban zoning to be applied to Future Urban Zoned land. The FULSS 2017 identifies expected delivery of the urban zonings to align with the provision of infrastructure. The FULSS is now recognised as being out of date because of planning decisions that have been made and implemented in the intervening years. While Warkworth has a town centre and associated residential development it is also a rural service town for the many communities nearby such as Matakana, Point Wells, Omaha, Pakiri, Puhoi, Wellsford. As set out above the affordability of housing in Warkworth and the eastern beach settlements is expensive, and Wellsford provides a viable option for many people for more affordable housing is close proximity to the labour market at Warkworth and further south at Silverdale.

To achieve the outcomes stated in the NPS: UD and the EHSA, as well as to ensure the most efficient use of Properties, this submission seeks that the properties are zoned Residential Mixed Housing Urban.

Whilst it is acknowledged that the Council has taken a blanket approach to exclude urban areas with a population of less than 5,000 at the time for the 2018 census from the application of the MDRS, this approach has not properly considered that Wellsford is already and "urban environment", being part of part of a housing and labour market of at least 10,000 people.

The Properties' unique split-zoning characteristics, greenfield development potential and proximity to an existing local centre, makes Residential: Mixed Housing Urban zoning and related residential development a better, more efficient outcome for the Properties than the existing zoning pattern. The current zone boundaries do not appear to relate to physical site features or cadastral boundaries. The properties are bounded by School Road and Worker Road, such boundaries provide a defensible boundary for the urban development of Wellsford.

The zoning sought responds positively to the new legislation. Greater efficiencies are achieved, and a quality compact urban form can be better achieved, by enabling urban development on strategically located greenfields land, rather than relying on ad hoc infill to occur to provide for the required housing supply. The properties lend themselves to be developed as one parcel with the system of watercourses located in the central portion of the site being able to be protected and enhanced to provide a high public amenity feature when the site is developed.
For the reasons outlined above, it is our submission that it is entirely appropriate for the Properties to be zoned Residential: Mixed Housing Urban, by way of PC78.

If the Countryside Living portions of the property are developed in accordance with the current zone rules this would see sites with an average of 1 hectare created which would be used for rural lifestyle purposes. It is my opinion that the subdivision of the properties for this purpose would be a highly inefficient use of land which is entirely suitable, and well located, for more intensive residential development and would negatively impact on the ability to provide a well-functioning urban environment within Wellsford.

<u>Plan Change 80 - RPS on Well-functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters</u>
Plan Change 80 seeks to incorporate additional text into the Regional Policy Statement ('RPS'). The text in general is supported but the submission seeks that the Policies are further amended to provide direction as to what needs to occur to improve resilience to the effects of climate change and what reflects a well-functioning urban environment.

The additional policy wording is generic and does not provide any guidance for assessing whether any proposal achieves the outcomes sought. For example, Policy 1 of the NPS-UD states:

> *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.

Ellper Holdings Limited submits that more specific guidance should be provided in the RPS Policies (consistent with Policy 1 of the NPS-UD) to direct what climate change resilience and well-functioning urban environments mean in the context to places in Auckland. For example, well-functioning urban environments in Auckland:

- contain well connected paths and trails for pedestrians and cyclists;
- have good quality and accessible public open spaces to support a wide range of recreational pursuits; including sport, active and passive recreation;
- have access to a range of quality community facilities including libraries, civic spaces and entertainment venues; and
- ensure the natural environment is protected and enhanced.

The submission seeks that the provisions to be included in the RPS relating to well-functioning urban environments and climate change resilience are expanded to provide specific policy guidance as to what these terms mean in the context of Auckland.

Without greater specificity the policies will not provide sufficient guidance as to how the objectives should be achieved in the context of Auckland.

Ellper Holdings Limited notes the s32 report states that the *RPS already adequately addresses more of the matters identified in the NPS-UD that are considered to contribute to a well-functioning urban environment and covered off specifically more*[4]. The RPS needs to create the connection, or be explicit that achieving these outcomes i.e., a well-functioning urban environment is to be achieved with reference to all relevant provisions in the RPS, or clearly set out what represents a well-functioning urban environment.

The option to make minor amendments to the RPS is understood but Ellper Holdings Limited submits that without some further guidance the costs of the changes proposed may be greater as there is less guidance on how the Plan seeks the outcomes be achieved and therefore there is greater scope of inconsistent decision making, appeals and inconsistent environmental outcomes.

Decision Sought

Ellper Holdings Limited seek the following decision by Auckland Council:

1. PC78 be approved in part subject to the matters raised within this submission, namely the rezoning of the land at 226 School Road and 79 and 11 Worker Road, Wellsford to the Residential: Mixed Housing Urban zone with no qualifying factors applying.

[4] Plan Change 80, s32 Report, page 15, paragraph 1

2. PC80 be approved, with such amendments as are required to:
   a. Clarify what a 'well-functioning urban environment' means in the context of Auckland. For example they:
   - Contain well connected paths and trails for pedestrians and cyclists;
   - Have good quality and accessible public open spaces to support a wide range of recreational pursuits; including sport, active and passive recreation;
   - Have access to a range of quality community facilities including libraries, civic spaces and entertainment venues; and
   - Ensure the natural environment is protected and enhanced.

   b. Express what climate change resilience will entail with respect to urban growth and form, natural resources, coastal environment, and environmental risk.

Any other relief required to achieve the outcomes sought in the submission.

Hearing of Submission

Ellper Holdings Limited do wish to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.



[redacted]
Manager/Planner
The Planning Collective Limited
(person authorised to sign on behalf of submitter)

Date: 29 September 2022

Address for Service:

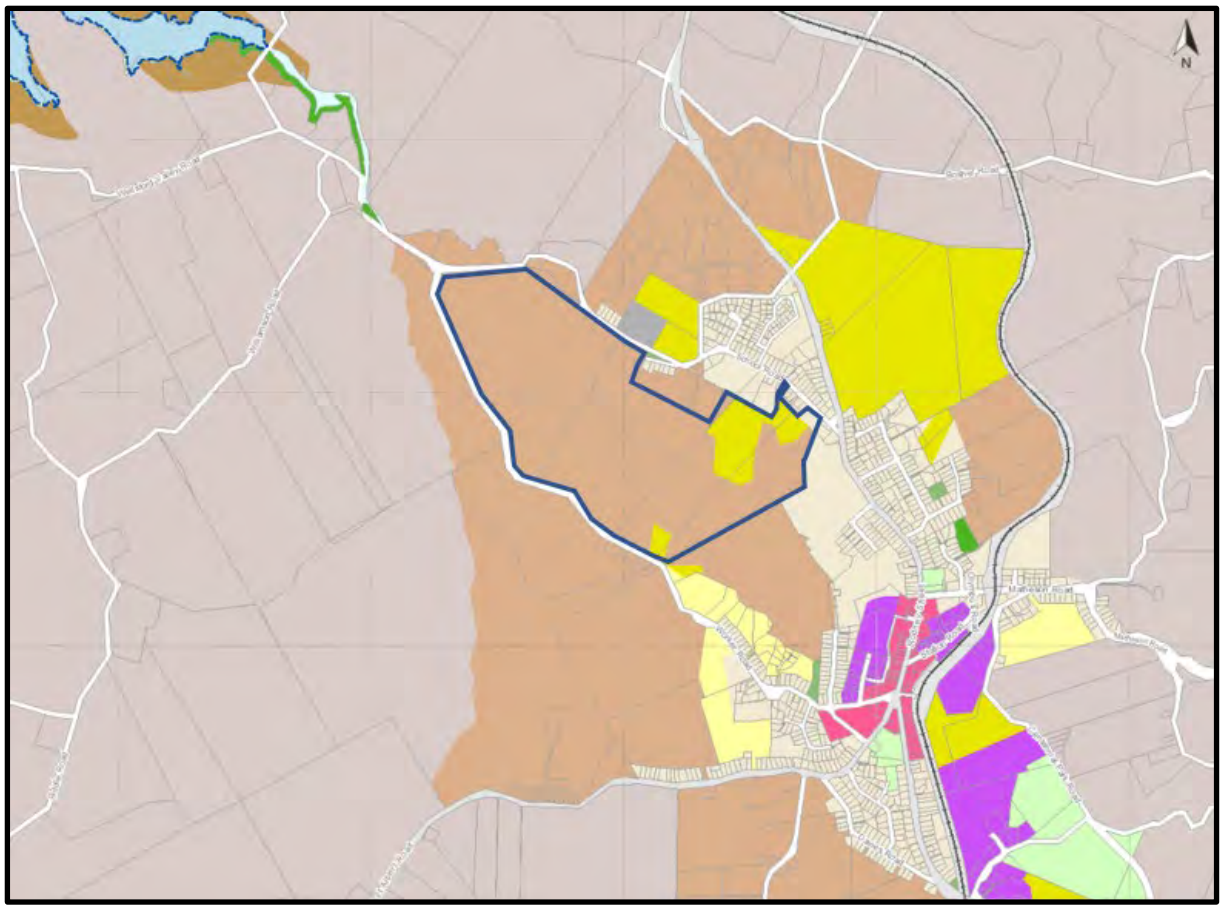
Ellper Holdings Limited
The Planning Collective Limited
PO Box 591
Warkworth 0941
[redacted]

Attachments

1: AUP-OP Maps
2: Flooding as depicted by Auckland Council GeoMaps

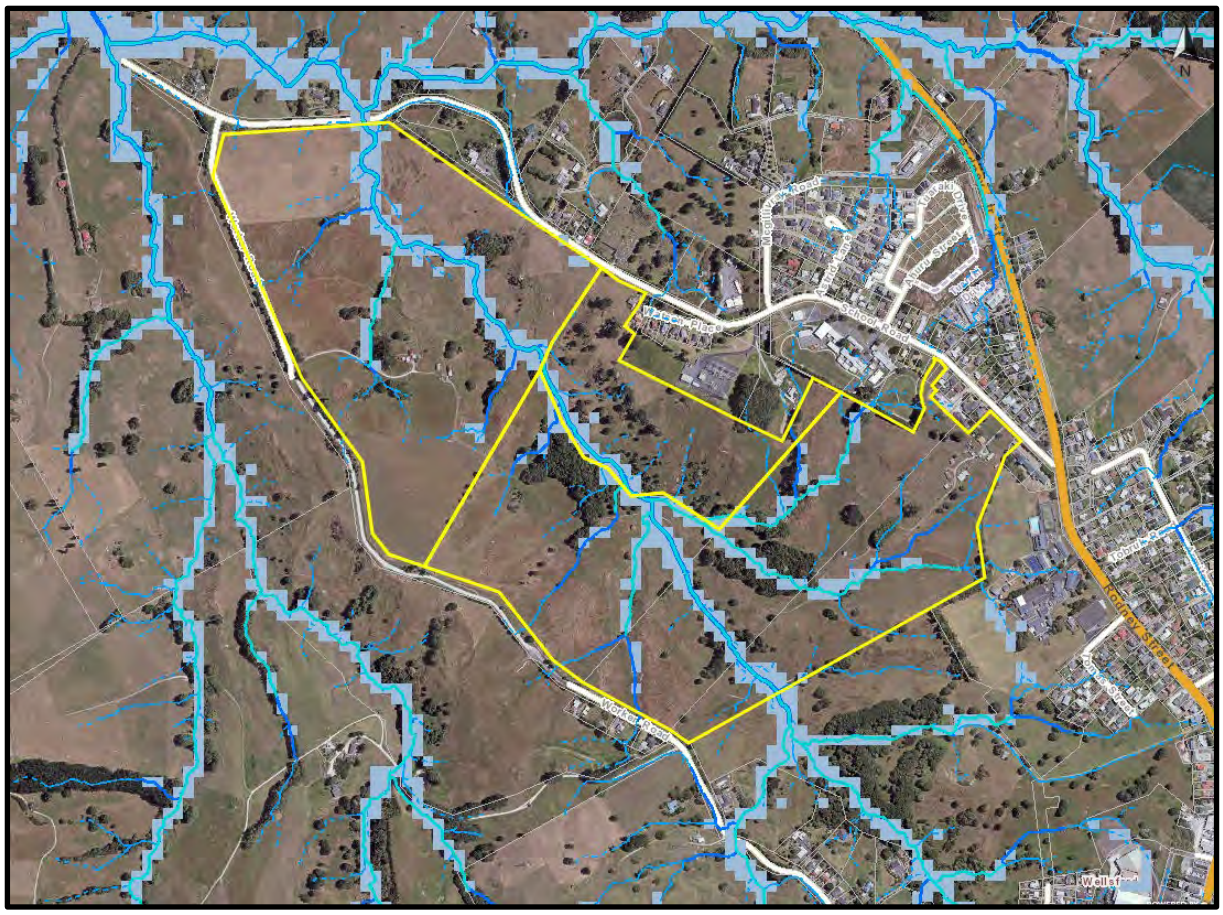
Attachment 1:

AUP-OP Maps



Attachment 2:

Flooding as depicted by Auckland Council GeoMaps



End of Report

Future Development Plan 2023 #8559

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

Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

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

[redacted]

From: [redacted]
Sent: Thursday, 20 July 2023 12:22 pm
To: Future Development Strategy
Subject: Support FDS

Categories: Green Category

I support FDS . Well done Auckland Council for developing this brave FDS. Developing a strong land use strategy is the key to solving our transport issues. Without sufficient density we will never develop an efficient public transport system and will continue to drain our natural resources.

Future Development Plan 2023 #8560

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

Your feedback

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

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?

SUBMISSION ON THE DRAFT FUTURE DEVELOPMENT STRATEGY

To: Auckland Council (Planning, Environment and Parks Committee)

Name of Submitter: Best Berries (NZ) Ltd and Luxembourg Development Company Ltd

Address: [redacted]

1. SUMMARY

1.1 This submission relates to the draft Auckland Future Development Strategy 2023-2053 (**FDS**) and is filed on behalf of Best Berries (NZ) Limited and its associated companies (**Best Berries**). Best Berries owns, or leases and operates, a significant portion of land in the Riverhead Future Urban Area (**FUA**) and has invested significant resource in its landholdings in the area in anticipation of future urbanisation.

1.2 While Best Berries acknowledges that as a region Auckland should provide sufficient capacity for growth in the right place and at the right time, it is concerned that Auckland Council is seeking to constrain, reduce and limit the extent of growth previously enabled under previous regulatory and planning processes such as the Auckland Unitary Plan. This places an unreasonable financial burden on businesses and landowners who have made significant financial and other investment decisions in the intervening period.

1.3 Specifically, Best Berries opposes the Council's proposal to reclassify the Riverhead FUA for "removal, either partially or entirely" and consequentially rezoned from future urban to a rural zone. We consider the Council has inadequate evidence to support this reclassification, that the assumptions used by the Council are not supported by any technical evidence and are without merit. Best Berries has engaged independent engineering experts to peer review the Council's assessment regarding flooding risk. Its expert view is that the Council's technical work is inaccurate, overstated as to risk and therefore the purported grounds for reclassifying the land have no merit. This assessment by McKensie and Co is attached as Appendix A.

1.4 In addition, Best Berries considers that the growth scenarios modelled by the Council will fall short of providing sufficient urban development capacity to meet Auckland's medium and long term projected demand without the projected Riverhead FUA. By extension, Best Berries considers that the Council will not meet its obligations under the National Policy Statement for Urban Development if the Riverhead FUA is declassified (even partially).

1.5 The Riverhead FUA land is an important area for future development and growth in Auckland. It provides the opportunity for greater housing choice and typology, extends the existing Riverhead township in a logical and sound way, which can be feasibly enabled by infrastructure that is already planned for in appropriate staging. The Riverhead FUA has the potential to provide much needed housing, employment, and community facilities for the existing and future urban land and the opportunity for comprehensive and considered development of the area. Removal of the Riverhead

FUA would result in more ad hoc and inconsistent development of the area through the usual consenting process.

1.6 Removal of the Riverhead FUA would also represent a substantial shift in the prevailing policy since the Auckland Unitary Plan (**AUP**) was made operative in 2016 giving rise to a legitimate expectation that the land would be rezoned for urban purposes. There has been considerable investment made in the consolidation of landholdings and development of plans to give effect to the prevailing policy in line with the timeframes set out in the Future Urban Land Supply Strategy 2017 (**FULSS**). Given the legitimate expectations created, and financial costs incurred by Best Berries in terms of investment and relocation plans for its current business operations, it is only fair and equitable that some form of compensation could be expected in the event of reclassification of the land by Council.

1.7 Best Berries welcomes the opportunity to provide further information to the Council on these matters.

2. INTRODUCTION

2.1 Best Berries owns more than 13ha of the total 80ha Riverhead FUA. When combined with a further 17ha which Best Berries leases, in total it operates more than a third of the total area. Best Berries purchased its properties in 2018 at which time the land was zoned for future urban development.

2.2 Since its acquisition and operation of the Best Berries farm at Riverhead, Best Berries has operated the site on the basis that the land would function as a farm until sometime between 2028 and 2032 when it would then be available for a comprehensive and integrated new urban neighbourhood as set out in the FULSS. This has involved future planning and investment on relocation opportunities for relocation of its current operations. Best Berries' operations provide a transition from the sites' current light rural use and tourism to the future urban landscape.

2.3 In combination with the Kumeū and Huapai areas, the Riverhead FUA was projected under the FULSS to have a potential urban capacity of 6,600 dwellings. The timing of this land being "development ready" was reconfirmed as recently as May 2021 when Auckland Council adopted the Strategic Land Use Framework – North West. This assumed future land use and timing has guided Best Berries' business planning and investment decisions for the past five years.

3. GROWTH MANAGEMENT FRAMEWORK

Riverhead is recognised as an area for further urban growth

3.1 Riverhead is an existing urban area and local centre that is growing at pace. The Riverhead FUA represents a logical continuation of the existing Riverhead settlement pattern and extends the township to the western side of the Coatesville-Riverhead Highway.

3.2 Planned infrastructure upgrades to State Highway 16 and the Northern Interceptor are both progressing at least in part based on the anticipated development capacity for the Riverhead FUA. Te Tupu Ngātahi Supporting Growth has also lodged notices of requirements to route protect

Riverhead Road and the Coatesville-Riverhead Highway to upgrade these roads to an urban standard.

3.3 Removal of the Riverhead FUA, either partially or in full, would be at odds with the decisions taken to date on the development infrastructure for Auckland's North West. We note also that the Council has cited concerns that the Riverhead FUA could adversely contribute to Auckland's vehicle kilometres travelled (**VKT**) without any site specific assessment to support this proposition. We consider that reducing the development capacity and potential future population would actually have a far greater impact on increasing VKT as it would make the operation of frequent and reliable public transport in the area infeasible.

3.4 The Riverhead FUA also provides an opportunity for considered future-proofed development to occur in a planned way, including through the incorporation of three-waters infrastructure. Removal of the Riverhead FUA does not alleviate the growth pressures in the area, it simply redirects that pressure towards intensification and infill housing, or worse, plan changes for the neighbouring market gardens. If the Council removes the Riverhead FUA, it risks leaving the determination of where the future urban areas of Auckland's North West should be to the market.

Identified constraints for the Riverhead FUA have been overstated.

3.5 The Council's assumptions regarding transport related infrastructure are addressed in the earlier section. Here we address the other constraints identified by the Council for the Riverhead FUA and explain how these have been overstated.

3.6 Attached as an **appendix** to this submission is a technical review of the Council's assessment of the stormwater and flood risk for the Riverhead FUA. This review shows that the area at risk of flooding is considerably less than the 30% stated in the FDS, an error that is likely to have resulted from overreliance on a desktop analysis using historic and generic LiDAR data. McKenzie & Co also agree with other recent expert assessments where more detailed flood modelling and engineering proposals support the conclusion that the site is suitable for residential development using any of a number of feasible stormwater treatment approaches available.

3.7 We understand that the Council is particularly concerned over flood risks given Auckland's recent severe weather events and recognise that better stormwater management is required to avoid these issues in the future. Respectfully however we consider that the Council has overreacted in this instance and not considered the relatively strong performance of new urban areas with modern stormwater management devices (eg Hobsonville Point and Northcote).

3.8 We invite the Council to consider the engineering assessment completed by McKenzie & Co and allow this to be assessed through the plan change process rather than determining the issue through the FDS. As McKenzie & Co outline, the Best Berries' site provides an opportunity and potentially useful function in any urban stormwater catchment management planning.

3.9 We note that the Riverhead FUA is not subject to any additional constraints. In summary, the Riverhead FUA:

(a) Does not impact on any Outstanding Natural Landscape, Outstanding Natural Feature or Significant Ecological Area;

(b) Does not impact on sites of significance to mana whenua or on cultural and historic heritage sites;

(c) Does not compromise an extractable mineral resource;

(d) Will not result in incompatible land uses; and

(e) Considers effects on tangata whenua relationships, values, aspirations, roles and responsibilities with respect to an area.

4. COMPROMISING LANDOWNERS LEGITIMATE EXPECTATION AND CREATING FINANCIAL HARDSHIP

4.1 The AUP, along with the FULSS, establishes a legitimate expectation that the Riverhead FUA would be rezoned for urban purposes. The purpose of the FUZ is to identify greenfield areas suitable for urbanisation, which may include areas with local constraints as long as the constraints can be addressed by structure planning.[1] Since Riverhead was zoned as FUZ, several sites have been bought, sold and managed with the assumption that it would be rezoned for urban development within the next decade.

4.2 The FULSS sequenced the Kumeū-Huapai and Riverhead FUA to be development ready in 2028 – 2032 with an anticipated dwelling capacity of 6,600.[2] This was a clear signal to landowners, infrastructure providers and potential developers that the Riverhead FUA will be rezoned for urban purposes. For instance, a private plan change was lodged to rezone approximately 80.5 hectares of land from future urban zone to a mix of residential zones.[3] It is important that the Council be aware of the levels of investment that have been made based on these decisions and the exposure the Council would hold if it reversed the settings for the Riverhead FUA at this stage. Best Berries has made significant financial and investment planning decisions based on the existing FULSS and FUZ indications.

5. IMPLEMENTATION AND PHASING

5.1 The FDS, in addition to the partial removal of the Riverhead FUA, proposes that whatever portion of the Riverhead FUA that remains only be released for development in "2050+". This level of delay is unreasonable, unjustified and would put the remaining Riverhead FUA into a decades long holding pattern that severely limits its landowners' rights.

5.2 The only explanation provided in the FDS for this 18-22 year delay from the current FULSS phasing is that "*Transport infrastructure is not planned to support development before 2050+*". We note that this is erroneous as the State Highway 16 safety improvement programme is scheduled to be completed within the more immediate future.

5.3 If the reference to "transport infrastructure" instead relates to the proposed works to implement the urbanisation of Riverhead Road and the Coatesville-Riverhead Highway, we note that the Infrastructure Funding and Financing Act 2020 provides a mechanism specifically designed to allow private funding to bring forward development infrastructure where public funding is not available

[1] Report to Auckland Council Hearing topic 028 Future Urban Zone July 2016 p 7.
[2] Auckland Future Urban Land Supply Strategy July 2017 p 18
[3] Future urban areas evidence report – for consultation June 2023 p 36.

[redacted]

sooner. These developer-led opportunities should not be discounted or foreclosed by planning and regulatory decisions.

6. FURTHER INFORMATION

6.1 Should the Council require any further information regarding the information set out in this submission or should it determine that the Council would benefit from engaging with Best Berries' experts, Best Berries confirms it would welcome, and expects to be included in, further discussions on the Riverhead FUA.

[redacted]

_____

[redacted]

Signed on behalf of Best Berries (NZ) Limited

31 July 2023

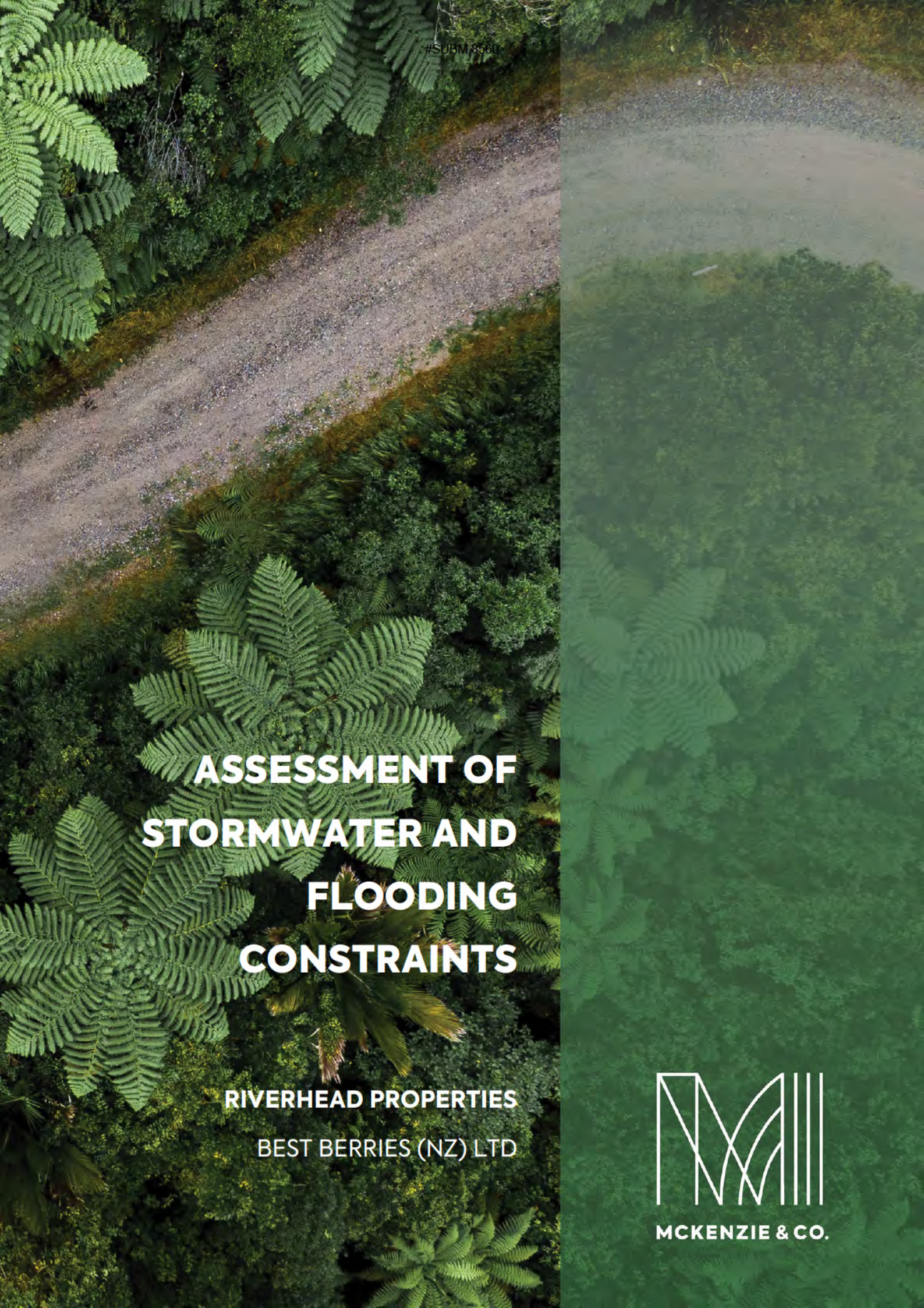
Electronic address for service of submitter:

[redacted]

[redacted] [redacted]

APPENDIX A: STORMWATER ENGINEERING REPORT FROM MCKENZIE & CO

#SUBM 8560



ASSESSMENT OF STORMWATER AND FLOODING CONSTRAINTS

RIVERHEAD PROPERTIES

BEST BERRIES (NZ) LTD

MCKENZIE & CO.

DOCUMENT CONTROL RECORD

PROJECT: Sustainab e Deve opment and Stormwater Management

CLIENT: Best Berries (NZ) Ltd

PROJECT LOCATION: Riverhead

Revision	Date	Originator	Checker	Approver	Description
A	20/06/23	JDK	RR	CM	DRAFT
B	20/07/23	JDK	RR	CM	ISSUE
C	31/07/23	JDK	RR	CM	FINAL

CONTENTS

1. Introduction 1

2. Land parcels in assessment 1

3. Future urban areas proposed for removal, either partially or entirely 1

4. 30 Cambridge Road, Riverhead 2

5. Council supplied information 2

6. Significant Hazard Constraints – areas for further investigation 7

7. Conclusion 9

Engineering drawings attached separate y

1. INTRODUCTION

I have been instructed to prepare this engineering assessment in response to the proposed removal of portions of the Kumeū-Huapai-Riverhead Future Urban Area (FUA) by Auckland Council as outlined in its draft Future Development Strategy 2023-2053 (FDS). In undertaking this assessment, I have visited the subject site and reviewed recent expert stormwater technical assessments prepared by independent consultancies in support of plan change and consent applications for the site. I have also undertaken an independent assessment of the stormwater constraints, including supporting technical material, identified in Auckland Council's draft FDS.

I am a Chartered Professional Engineer, and a Director of McKenzie & Co Consultants Ltd with over 20 years experience.

Having considered the assessments contained in the FDS and its conclusion the FUA is significantly constrained by natural hazards, it is evident these assessments do not appear to represent the actual site conditions, and exaggerate the extent of the floodplain, through the extent of the proposed removal of the FUA. It is therefore considered that the risks outlined are overstated and fail to consider the practical and feasible solutions that can easily address these concerns safely, sustainably, and effectively as part of any standard land development process. Excluding this land from the FUZ may also reduce practicable/efficient development options for stormwater catchment management for the wider catchment.

2. LAND PARCELS IN ASSESSMENT

The following land parcels are included in this submission –

1) LOT 1 DP 499822 - 30 Cambridge Road
2) Pt Lot 2 DP 4818 - 340 Riverhead Road
3) Lot 1 DP 61985 - 1140 Coatesville-Riverhead Highway

These properties are all currently zoned Future Urban Zone

3. FUTURE URBAN AREAS PROPOSED FOR REMOVAL, EITHER PARTIALLY OR ENTIRELY

The FDS indicates in Appendix 7, page 30 and in Figure 37, page 43 (solid black hatching) an area in of FUZ in Riverhead recommended for partial removal. The partial removal is based on the following statement:

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".

Parcels within the Kumeu-Huapai-Riverhead FUZ that fall ***entirely or mostly*** *within this floodplain*

extent are considered unsuitable for development due to limited appropriate land uses".

4. 30 CAMBRIDGE ROAD, RIVERHEAD

30 Cambridge Road sits within the area identified in the FDS for partia remova from the Riverhead FUA. Figure 1 :LOT 1 DP 499822.

Counci GIS has some f ood p ain shown over this property, which we have measured is approximate y 40% of the site. Given this doesn't fa under the definition of *...entirely or mostly within this floodplain ..."* we do not view this property as being unsuitab e for deve opment. Some of the areas of the site that are under the f ood p ain can a so be assessed further, as to their suitabi ity for deve opment.

This indicates the areas of the Riverhead FUA having a 'f oodp ain extent' on the Auck and Counci mapping system having imited appropriate and uses, particu ar y in the case of 30 Cambridge Road. The Counci 's characterisations of this area are incomp ete and fai to account for practica and feasib e potentia methods for imp ementing effective and sustainab e stormwater management infrastructure. Incorporation of suitab e stormwater management measures to enab e these parce s to be uti ised for future urban deve opment is considered practicab e and readi y avai ab e to address the existing f oodp ain constraints. Remova of this parce from the Riverhead FUA wou d ike y compromise the abi ity to masterp an and deve op an overa catchment so ution for stormwater management.

5. COUNCIL SUPPLIED INFORMATION

Figure 1 i ustrates the portion of the Riverhead FUA recommended for remova on the basis the Counci 's desktop ana ysis indicates there are f oodp ain hazards shown as a b ack pixi ated hatch) covering approximate y 80% of 30 Cambridge Road.

As noted above, the 1% Annua Exceedance Probabi ity (AEP) f ood footprint has been extracted from Auck and Counci 's GIS mapping and is superimposed in ight b ue. This indicates approximate y ha f the coverage (40% of the site) and traverses a we -defined ow- ying area a ong the western portion of the site.

Auck and Counci 's GIS a so shows a transmission ines traversing across the western edge of the site. These overhead transmission ines appear to be ocated within the 1% AEP f oodp ain and are a significant distance from any potentia deve opab e areas within 30 Cambridge Road.

It shou d be noted, during the 1% AEP event, the f oodp ain depicted in the GIS comprises two sources of water:

- F oodwaters originating from the neighbouring stream, which appear to exhibit sha ow sheet f ow characteristics.
- Loca over and f ow paths originating from both upstream and within 30 Cambridge Road.

The f oodwaters from the stream seem to sheet f ow across the southwestern corner of the site. However, the f ows appear to be within manageab e ranges, and cou d be managed through one of severa on-site management methods to prevent f ooding and/or improve downstream conditions. The f ood f ows genera y a ign with the over and f ow paths represented by b ue

arrows.

The and contours indicate minima storage capacity in this particu ar area of 30 Cambridge Road. Consequent y, water is primari y conveyed over the site rather than being stored on-site.

A noteworthy feature identified in this assessment is the presence of overhead transmission power ines. Under norma deve opment conditions, new residentia structures and bui dings are genera y to be avoided within the Nationa Grid Corridor. Thus, the area designated as "f oodp ain" cou d present an exce ent opportunity for conveyance and/or storage during 1% Maximum Probab e Discharge (MPD) f ood events, potentia y reducing downstream f ood hazards. Given this portion of the Riverhead FUA is not deve opab e for sensitive and uses such as residentia , regard ess of the presence of a f oodp ain, we consider the corridor to be a potentia over and f ow path feature or possib e 1% AEP storage/mitigation ocation.

P ease refer to Figure 2 be ow, which i ustrates the entry and exit points of the over and f ow paths on the site, denoted by b ue ines. The f oodp ain's entry point is indicated by so id red arrows, whi e the potentia rea ignment of over and f ows beneath the HV power ine is out ined in red.

Additiona y, an indicative road network is disp ayed in grey, suggesting that it cou d a ign with the over and f ow paths, if necessary, eading to sma , protected areas on the site.

CKL flood model

CKL Consu tants have deve oped a f ood mode to support the Riverhead Landowner Group's proposed Riverhead South private p an change. We have reviewed this mode against our assessment above. This mode provides a more detai ed representation of the f ood p ain when compared to the Counci 's GIS mode ing and is based on site-specific data. According to their findings, the identified hazard constraints can be addressed through the imp ementation of suitab e stormwater management measures and the incorporation of appropriate infrastructure.

Figure 2, reinforces the Counci 's mode ing resu ts, indicating that the f ood p ain is re ative y sha ow and primari y contained within the over and f ow path routes. By safeguarding existing streams, wet ands, over and f ow paths, and site contours, future residentia areas can be provided for and situated outside the f oodp ains. These measures are particu ar y significant when considered within the broader deve opment context, as depicted in Figure 3.

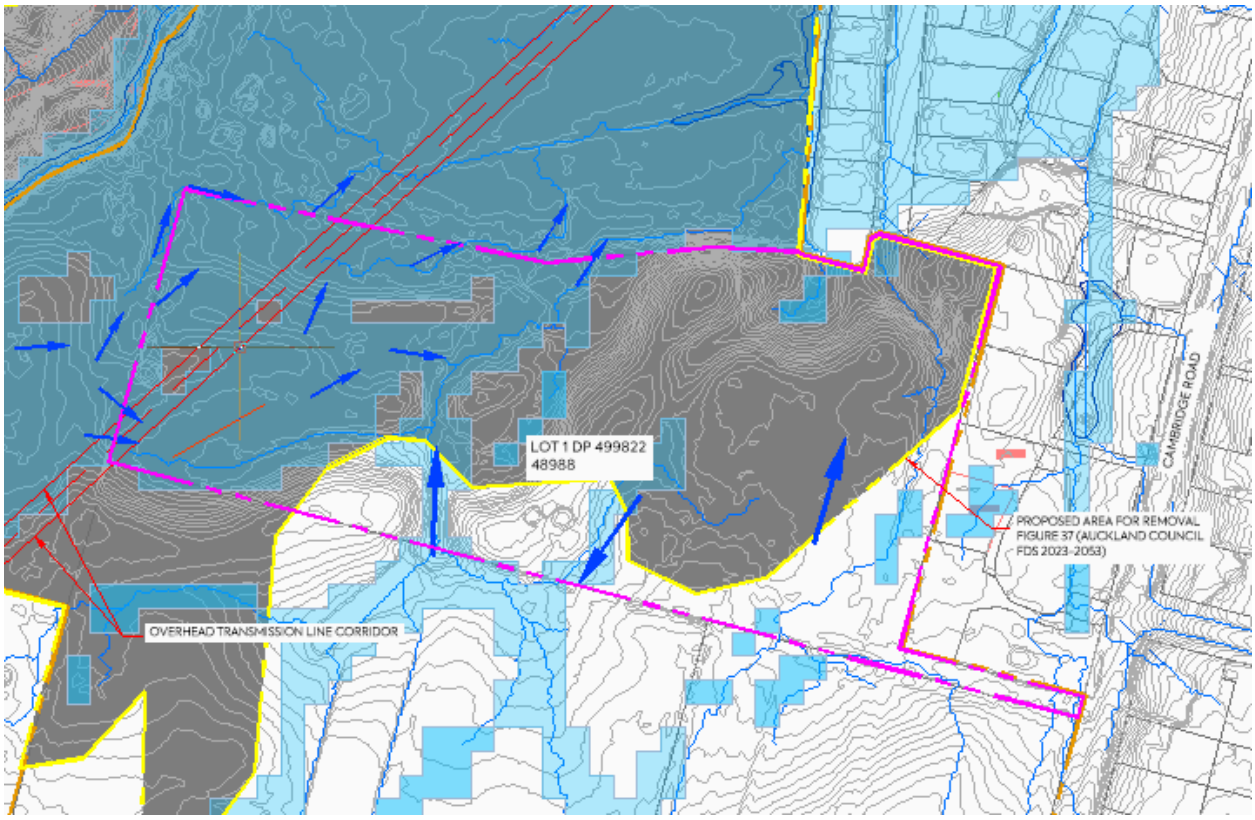


Figure 1 – FUZ area recommended to be removed (Shown in Black) due to floodplain Hazard, vs the Floodplain from GIS. HV overhead lines shown as red dashed line.

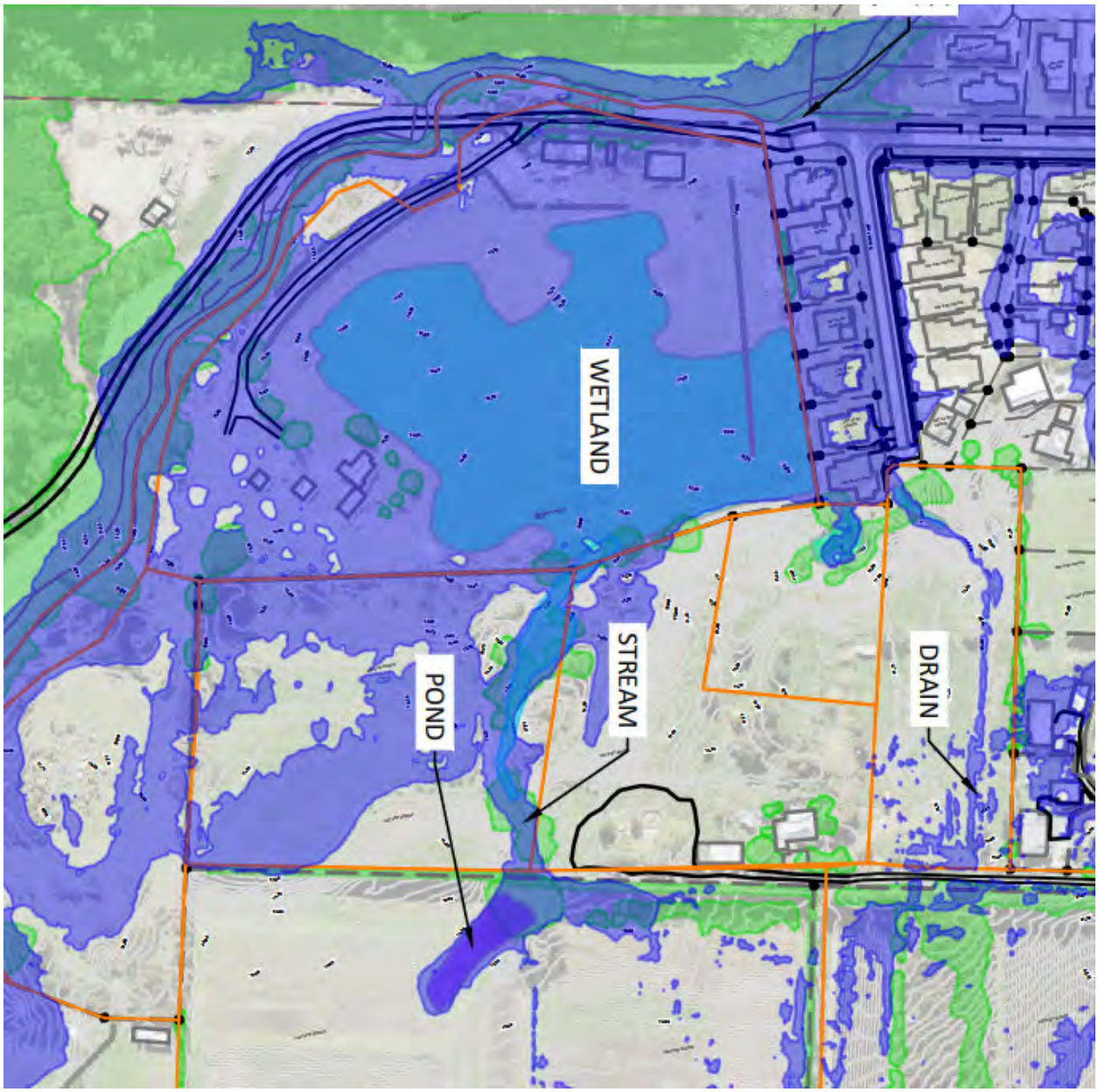


Figure 2 – 100 year MPD , Stormwater management and flood risk assessment, 2022, CKL.



Figure 3 – Master plan with OLFP overlaid, Stormwater Management & Flood assessment report, CKL 2002.

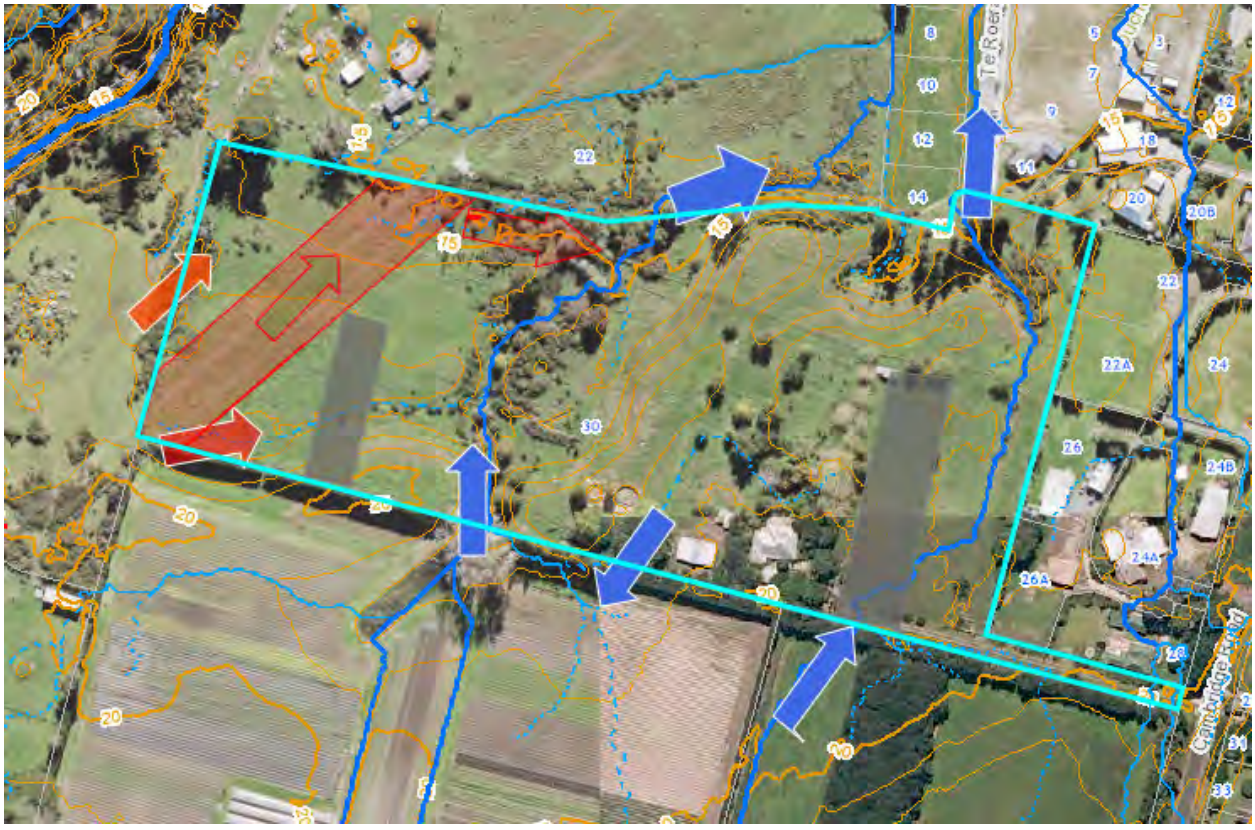


Figure 4 – Overland Flowpath locations. Overhead HV power lines shown in Red

We have undertaken our own high- eve assessment to check the % of the site covered by f oodp ain. This p an is attached in Appendix A. The p an confirms that the site is in fact covered approximate y 40% f ood p ain, whereas 80% of the site is proposed to be removed from FUZ zoning.

The site has we -defined streams and over and f ow paths, and as such we be ieve that the site is entire y suitab e for residentia deve opment, provided the appropriate stormwater infrastructure is in p ace.

In my opinion the Counci shou d re-eva uate the proposed remova of the Riverhead FUZ based on these findings. Contrary to the draft FDS conc usion, I consider the potentia for successfu deve opment through the imp ementation of effective stormwater management infrastructure. This approach wi a ow the uti ization of the and for appropriate and sustainab e purposes, such as residentia or commercia deve opment, whi e ensuring the safety and we -being of the community. More detai ed stormwater mode ing at the time of Resource Consent app ication wi be required, to demonstrate effects of any proposed deve opment on downstream properties and infrastructure.

6. SIGNIFICANT HAZARD CONSTRAINTS – AREAS FOR FURTHER INVESTIGATION

This report a so covers Pt Lot 2 DP 4818 - 340 Riverhead Road & Lot 1 DP 61985 - 1140 Coatesvi e-Riverhead Highway.

These properties are shown in Figure 5, and the figure is over aid with the 1% AEP event, from the Auck and Counci GIS.

Page 34 of the FDS document, states that -

Moderate hazard constraints. relating only to approximately 15% of the FUA being exposed to the 1% AEP flood plain, mostly along the northern boundary associated with a tributary of the Rangitopuni Stream but also other patches through the centre of the FUA."

It shou d be noted that most of these areas, which we have identified in Figure 5, are oca ised ponding areas, and not f ood p ain"". These areas represent a tota of approximate y 5% of the tota deve opment area.

This is we within standard parameters of any potentia site for and deve opment, and through re-contouring to suit deve opment, any oca ised ponding areas wou d be removed.

As with Section 4, a stormwater management and f ood assessment has been prepared which considers a masterp an. This p an considers and mitigates against these hazards, and it is expected that this p an reasonab y mitigates the moderate hazard mentioned. Figure 6 shows the proposa to mitigate the hazards, through the use of stormwater devices designed in accordance with Auck and Counci s GD01.

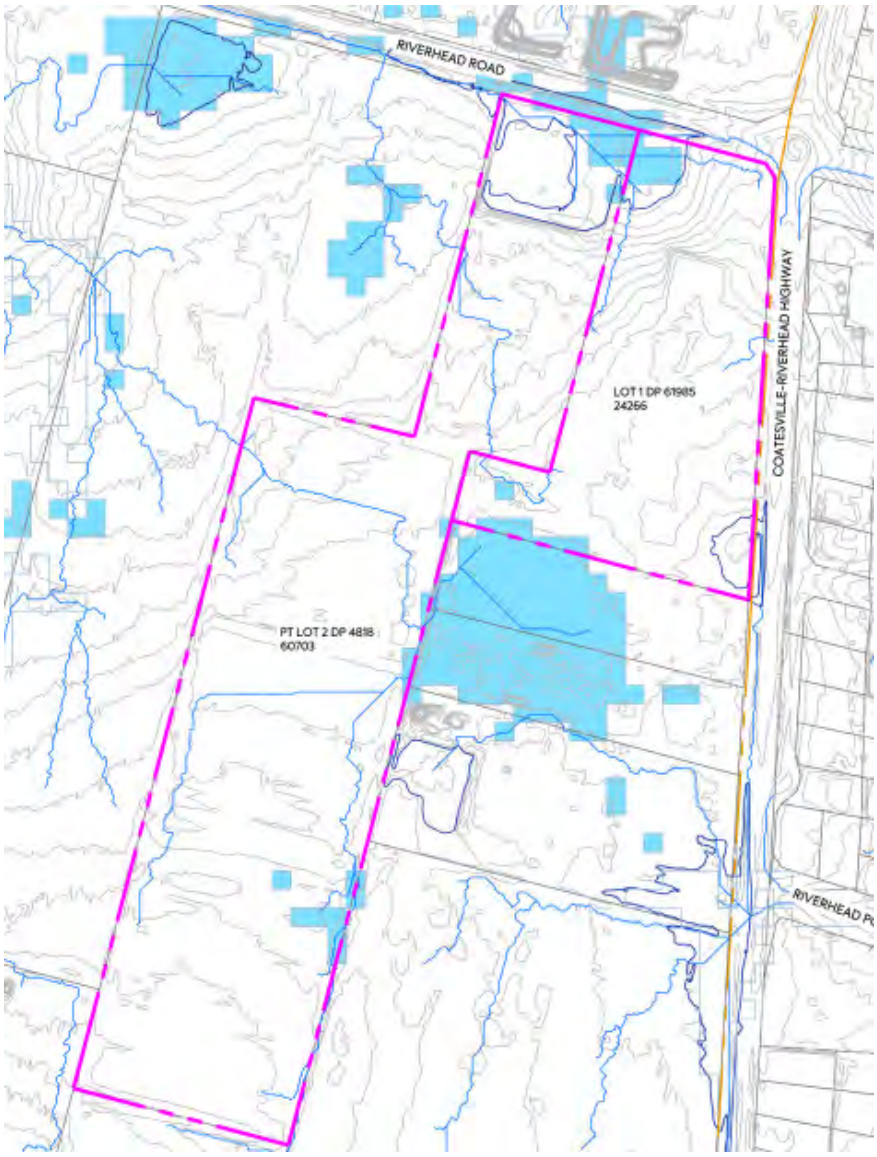


Figure 5 - Areas shown as 'further investigation" due to Natural Hazards.

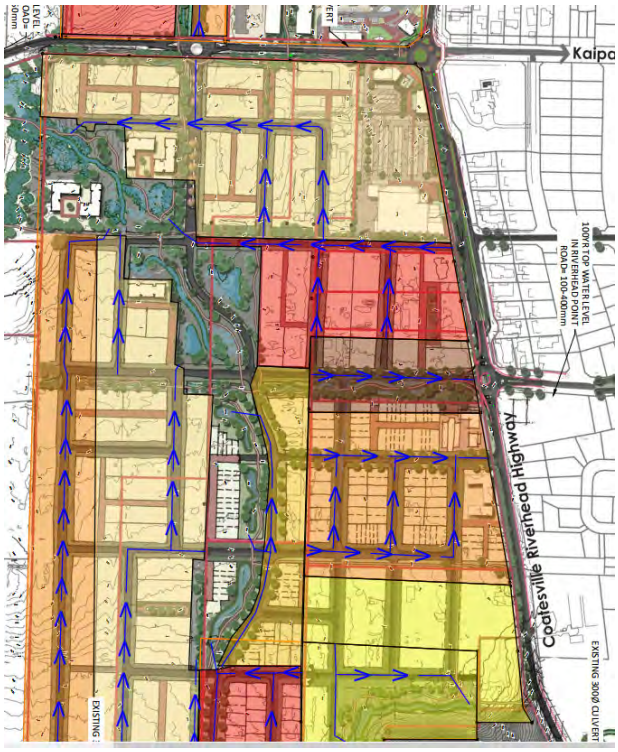


Figure 6 - Masterplan, stormwater corridor and overland flowpaths

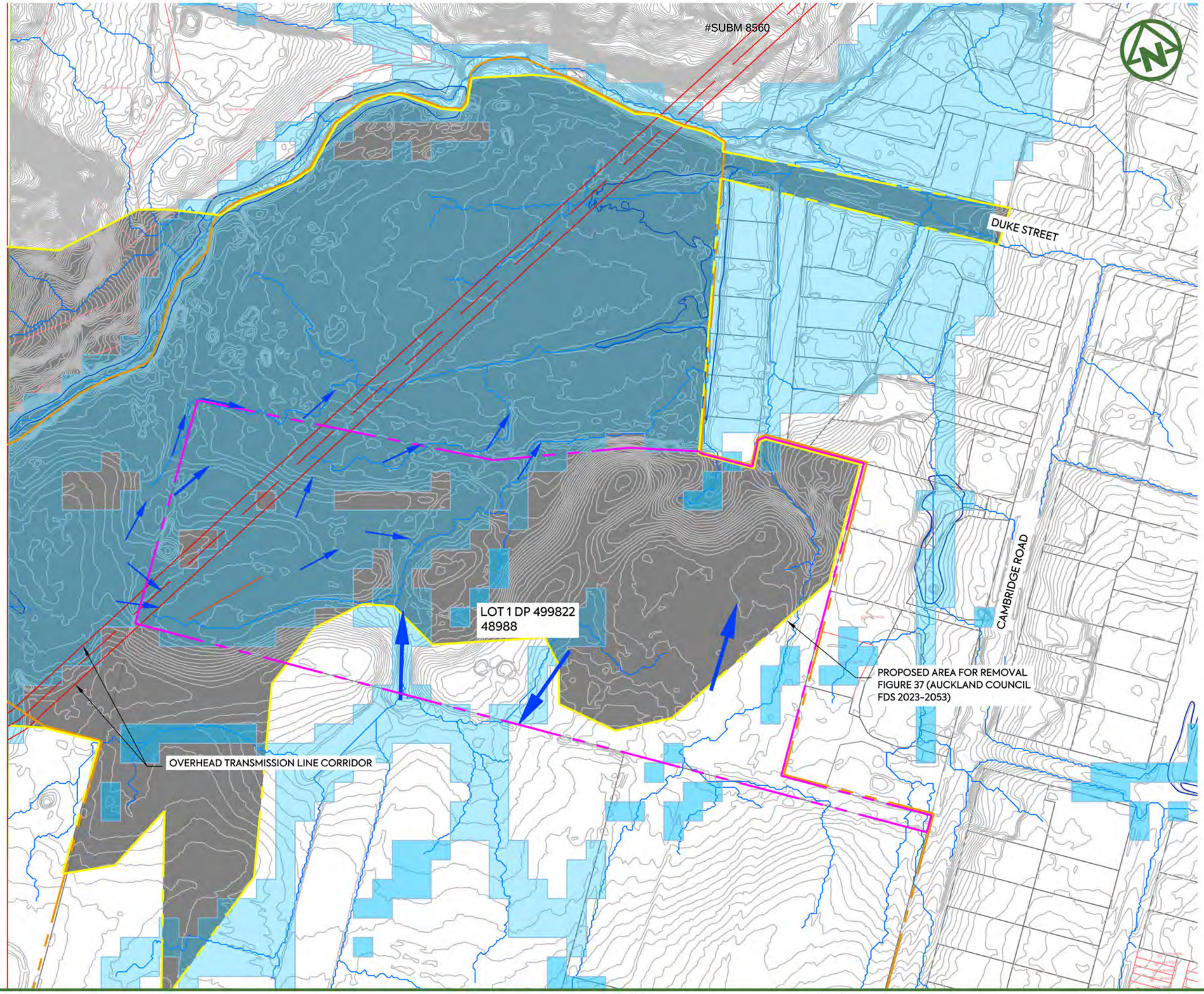
7. CONCLUSION

In conc usion, I have not been ab e to find any technica support for the Counci 's conc usions with respect to 30 Cambridge Road, to remove approximate y 80% of the FUZ zoning from the site, based on on y 40% of this site being affected by f oodp ain of various depths. I further add, my own assessment, CKL's technica evidence to support the conc usion that stormwater issues cou d be readi y and easi y addressed for this site in any future urban deve opment and wou d in fact provide a practica and usefu addition to catchment management p anning overa . A detai ed assessment can be addressed through the consenting and detai ed design stages.

Our assessment contradicts the FDS recommendation of remova of 80% of the site from FUZ zoning, for the Kumeu -Huapai-Riverhead area based *Parcels within the Kumeu-Huapai-Riverhead FUZ that fall* ***entirely or mostly*** *within this floodplain".* Our findings indicate whi e some f oodp ain does exist, we consider a majority of the site is suitab e for residentia deve opment with the imp ementation of standard stormwater infrastructure. From a stormwater perspective, a f oodp ain in itse f is not a reason to remove FUZ zoning. A detai ed assessment can be addressed through the consenting and detai ed design stages.

We recommend Counci reassess the proposed remova and consider the potentia for successfu and safe deve opment in ine with effective stormwater management practices.

In regards to 340 Riverhead Road & 1140 Coatesvi e-Riverhead Highway, this report high ights the presence of oca ized ponding areas within the deve opment sites, which can be effective y mitigated through appropriate stormwater management measures, a owing for safe and feasib e and deve opment.



NOTES:

1. TOTAL AREA OF LOT DP 499822 IS 4.9 Ha.
2. GIS OVERLAND FLOWPATH AREA WITHIN LOT DP 499822 IS 2.0 Ha (40.1% OF TOTAL SITE AREA).
3. PROPOSED AREA FOR REMOVAL FIGURE 37 (AUCKLAND COUNCIL FDS 2023-2053) WITHIN LOT DP 499822 IS 3.84 Ha (78.4% OF TOTAL SITE AREA).

LEGEND:

- OVERALL FUA BOUNDARY
- FUA - AREA PROPOSED FOR REMOVAL
- LOT BOUNDARY (30 CAMBRIDGE ROAD)
- EXISTING (1.0m) CONTOUR (62.0)
- CADASTRAL BOUNDARY
- 100-YEAR FLOODPLAIN (AUCKLAND COUNCIL GIS)
- OVERHEAD TRANSMISSION LINE
- PROPOSED REMOVAL AREA (FDS)
- 1% AEP FLOW ARROWS (INDICATIVE GENERAL DIRECTION)

CLIENT:

PROJECT:

30 CAMBRIDGE ROAD
RIVERHEAD

TITLE:

AUCKLAND COUNCIL
GIS OVERLAY
PLAN

PURPOSE OF ISSUE:
FOR DISCUSSION

SCALE:
1:2000
DO NOT SCALE

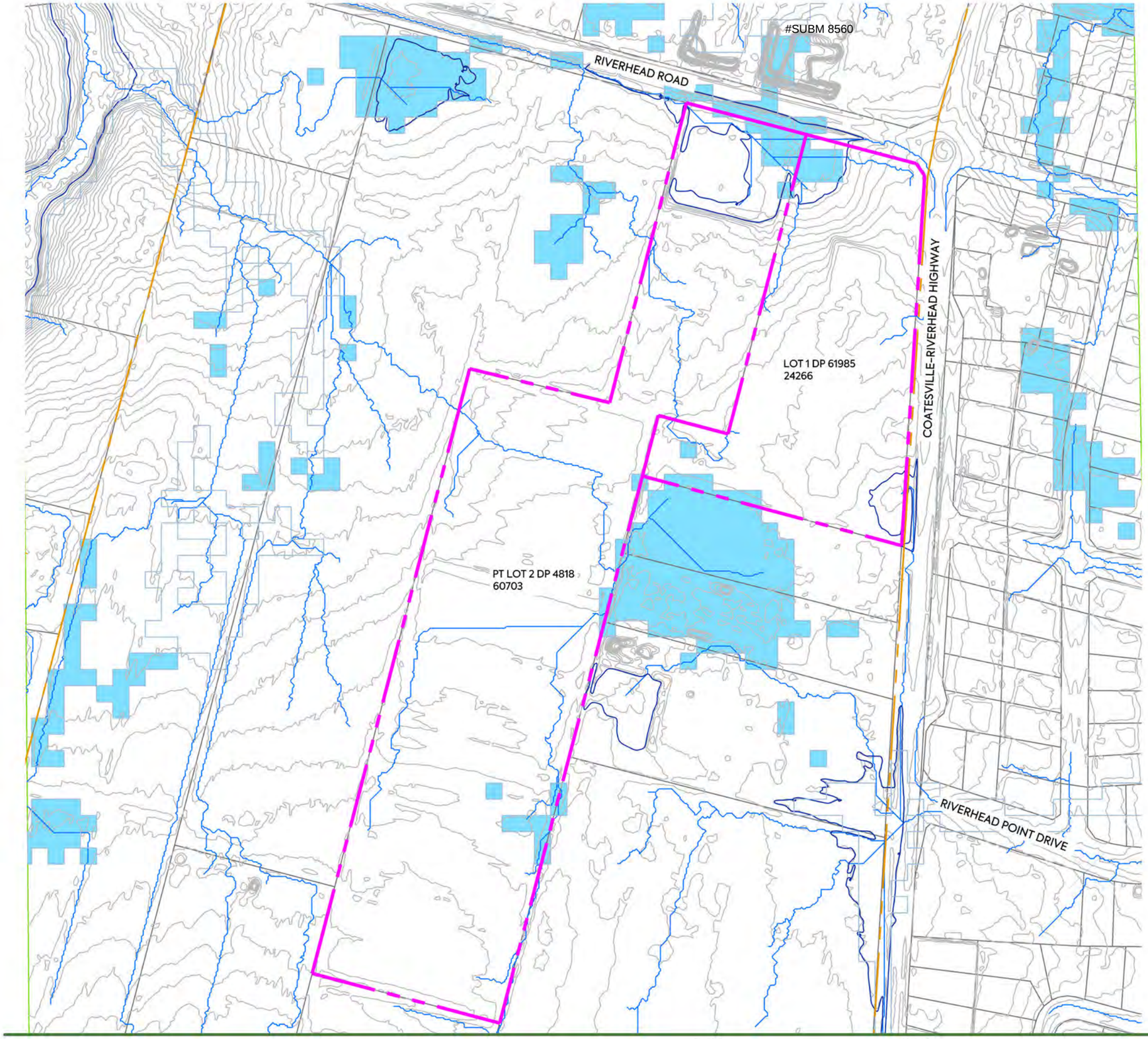
DRAWING NO: 3417-900

REV: A

MCKENZIE & CO.

REV	DESCRIPTION	DRN BY	CHK BY	APP BY	DATE
A	FIRST ISSUE	SS	RR	JDK	16/06/23

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LEGEND:

- OVERALL FUA BOUNDARY
- FUA – AREA PROPOSED FOR REMOVAL
- LOT BOUNDARY (30 CAMBRIDGE ROAD)
- EXISTING (1.0m) CONTOUR (62.0)
- CADASTRAL BOUNDARY
- 100-YEAR FLOODPLAIN (AUCKLAND COUNCIL GIS)
- OVERHEAD TRANSMISSION LINE
- PROPOSED REMOVAL AREA (FDS)
- 1% AEP FLOW ARROWS (INDICATIVE GENERAL DIRECTION)

CLIENT:

MCKENZIE & CO.

PROJECT:

340 RIVERHEAD ROAD AND
1140 COATESVILLE-RIVERHEAD
HIGHWAY, RIVERHEAD

TITLE:

AUCKLAND COUNCIL
GIS
PLAN 2

PURPOSE OF ISSUE:

FOR DISCUSSION

SCALE:
1:2500
DO NOT SCALE

DRAWING NO: 3417-901

REV: A

REV	DESCRIPTION	DRN BY	CHK BY	APP BY	DATE
A	FIRST ISSUE	SS	RR	JDK	16/06/23

THIS DRAWING IS SOLELY FOR USE BY THE CLIENT ON THIS PROJECT ONLY. NO LIABILITY IS ACCEPTED IN ITS USE BY ANY OTHER ENTITY OR FOR ANY OTHER PURPOSE

Future Development Plan 2023 #8561

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 lack of proper planning and staging in your strategy is appalling.

Intensification should be carefully considered and staged to avoid the costly mistakes that we see everywhere in the

city: bursting pipes and sewage overflow, traffic congestion, too many houses in areas not serviced and without

basic amenities; irreparable destruction of the environment (contrary to current legislation), apartment complexes

consisting on boxes that do not provide enough space and light and have nothing to do with promoting "thriving

communities", often built on wetlands or on geologically unstable terrain, that have no parking onsite in a city that is

the fourth largest in New Zealand and endures months of wild weather that forces cancellation of public transport.

Are you discriminating against young families with babies and toddlers, elderly, disabled, tradies, visitors driving

around with their luggage, those having an emergency or recovering from an injury or who need to commute for

work or to look after loved ones and depend entirely on their car?

Greenfield development must be included in the proposal with emphasis on areas that have a plan to create
sustainable communities, including infrastructure and employment opportunities

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

On the other hand, the Auckland Unitary Plan provides a sustainable housing approach that follows infrastructure

development, ensures environmental protection and takes into account several other important factors to meet the
forecasted population growth.

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 Submission

#8561

[redacted]

From: [redacted]
Sent: Sunday, 30 July 2023 9:09 am
To: Future Development Strategy
Subject: My submission on the Future Development Strategy

The lack of proper planning and staging in your strategy is appalling.
Intensification should be carefully considered and staged to avoid the costly mistakes that we see everywhere in the city: bursting pipes and sewage overflow, traffic congestion, too many houses in areas not serviced and without basic amenities; irreparable destruction of the environment (contrary to current legislation), apartment complexes consisting on boxes that do not provide enough space and light and have nothing to do with promoting "thriving communities", often built on wetlands or on geologically unstable terrain, that have no parking onsite in a city that is the fourth largest in New Zealand and endures months of wild weather that forces cancellation of public transport.
Are you discriminating against young families with babies and toddlers, elderly, disabled, tradies, visitors driving around with their luggage, those having an emergency or recovering from an injury or who need to commute for work or to look after loved ones and depend entirely on their car?
While other countries protect and enhance their beautiful suburban neighbourhoods, the uncontrolled intensification in Auckland (building as many boxes in any given site, regardless of the negative impact on the adjacent properties and wider area) is ruining them beyond repair and dilapidating ratepayers money to fund totally preventable damage.
The extra expenses incurred as a consequence of the often ongoing and not always successful attempts to repair what should have never happened is actually against the purpose of the Covid recovery program.
The proposed development on 30-40 Sandspit Road is an example of bad planning based on wrong assumptions: it is not an IRD, it is not going to have minor impact, the ground is geologically unstable, it is on the first ridge of a steep slope that discharges on neighbouring properties, on streams full of wildlife and ends directly on a vulnerable estuary that already has a cockle ban due to contamination. The site is already contaminated with petrol and asbestos!! The ageing infrastructure is already overloaded by thousands of students, staff and visitors to the four schools in the area; traffic and parking are at breaking point; Sandspit Road is NOT a main artery but a feeder road at most.
Allowing such intensification on that site would be a total disaster. I strongly recommend that you reject it.
On the other hand, the Auckland Unitary Plan provides a sustainable housing approach that follows infrastructure development, ensures environmental protection and takes into account several other important factors to meet the forecasted population growth.
The FDS is a short-sighted "strategy" that contradicts your own legislation and would negatively impact all of us, including those it is supposed to benefit.
I am deeply concerned that there is insufficient information and time available to properly consider a proposal of such significance to the future of Auckland.
Further time and supporting material for the Council proposal needs to be provided.
I request that hearings are held so that I can detail my concerns to the Governing Body and so the proposal can be properly debated.
Intensification should be limited to locations with sufficient infrastructure, schools, reserves and other facilities to support such development.
Greenfield development must be included in the proposal with emphasis on areas that have a plan to create sustainable communities, including infrastructure and employment opportunities.

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.

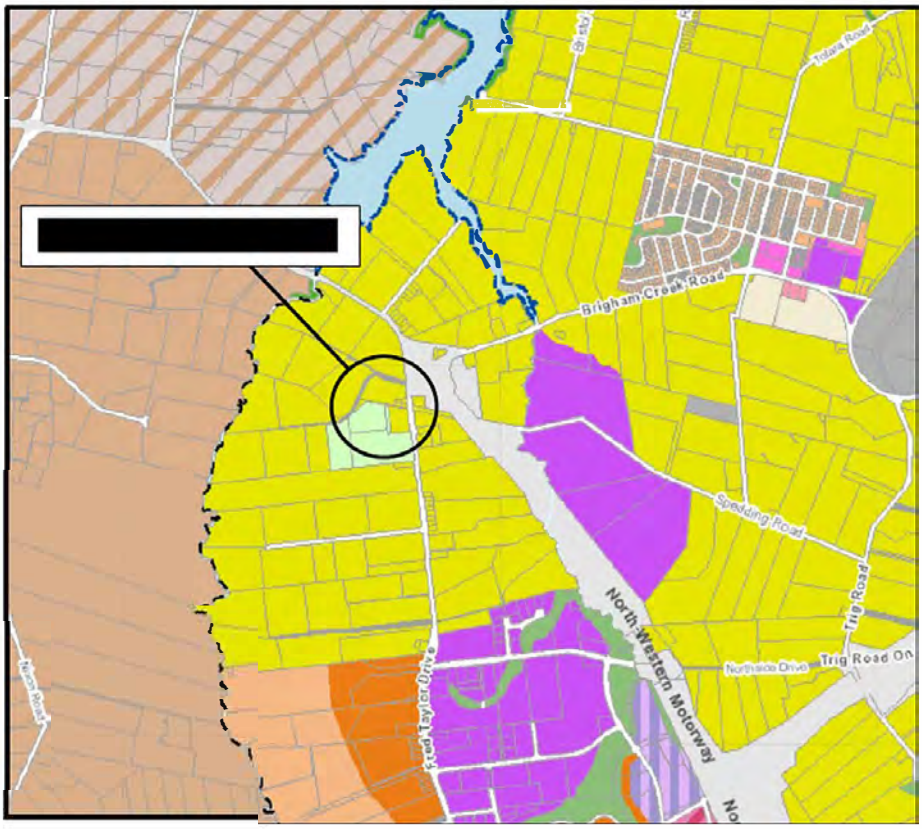


Figure 2 - AUP-OP Maps (source: AUP-OP GeoMaps, July 2023)

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]

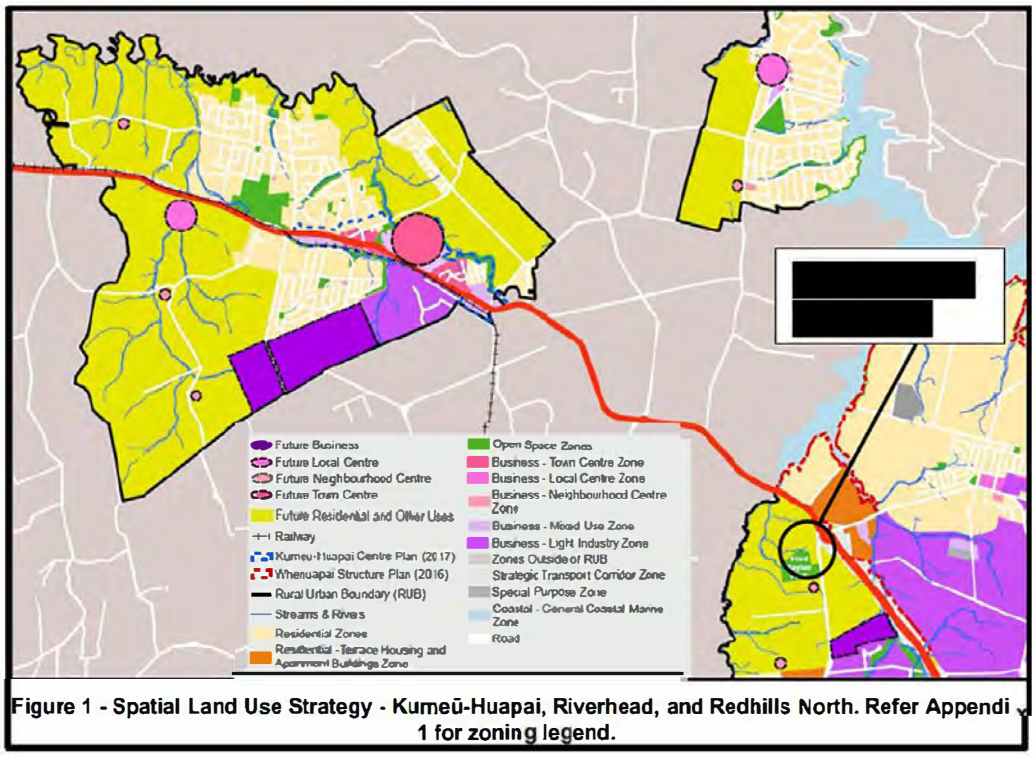


Figure 3 – Spatial Land Use Strategy for North-West Auckland

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:

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?

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.

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?

#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

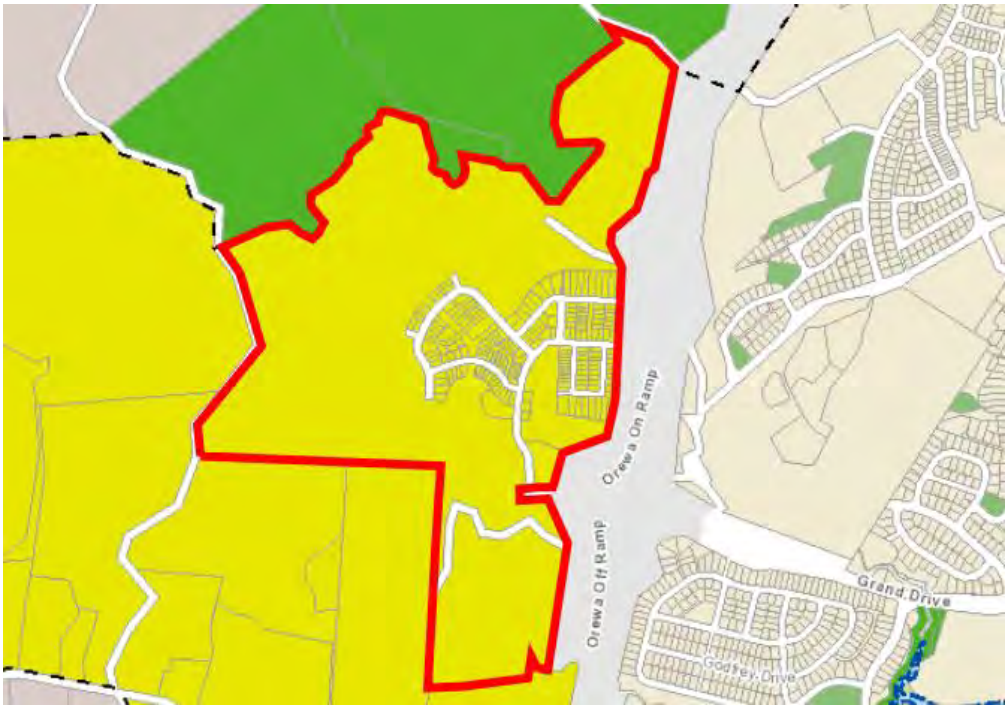


Figure 1 – Ara Hills (Hall Farm)

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**.

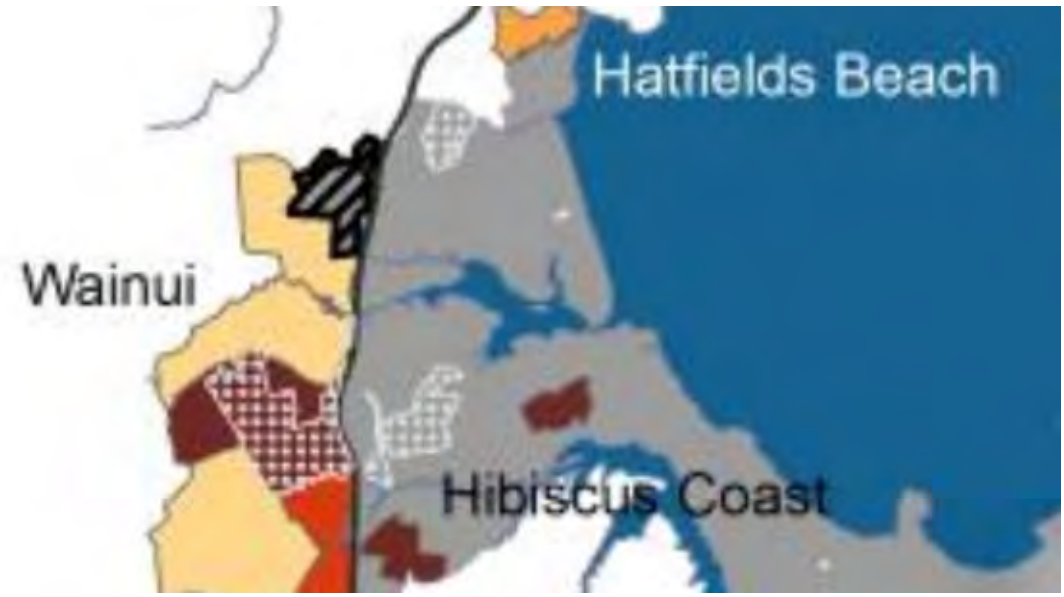


Figure 2 – Auckland Future Urban Land Supply Strategy Map

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'.

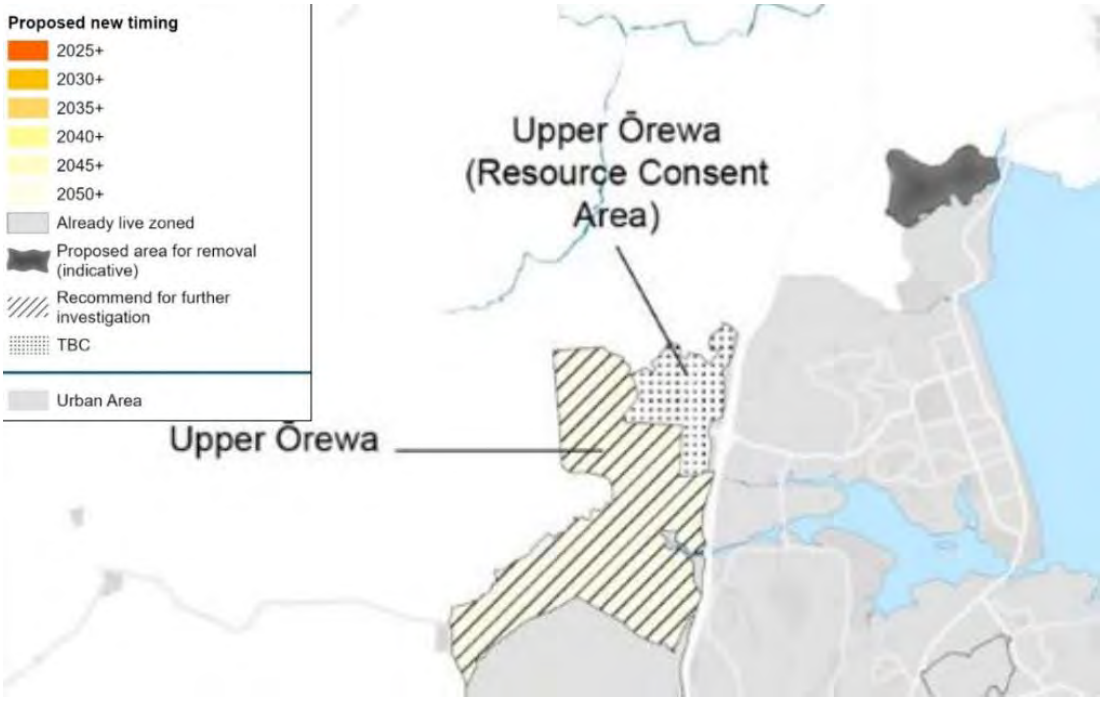


Figure 3: Proposed timing and approach for Upper Orewa Future Urban Areas

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

Address for service of submitter:

AV Jennings
C/- Campbell Brown Planning Limited
PO Box 147001

Ponsonby
AUCKLAND 1144



Future Development Plan 2023 #8564

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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

I strongly support focusing growth within the existing urban area, for the reasons outlined in the FDS.

However, for this to work for Auckland's diverse populations, there are some key requirements.

These include, but are not limited to the following:

A - Amenity Improvememts

An improved level of amenity in future, for more intensive housing, both on individual sites and in the surrounding area is important.

Some builds that have occurred under the existing Unitary Plan, appear to have very limited on-site amenity, and/or compromise the sunlight and other amenity of close neighbours, and be in areas where there are few outdoor amenities such as parks and other community facilities

B - Sections and areas prone to flooding or sea level rise Auckland is quite hilly. In many areas that may be appropriate for more intensive development, there is also housing at the low points of catchments, and/or very close to sea level. This is because many old Auckland streets ignored the existence of streams and/or undergrounded them, and traditionally the coast has been a popular place to settle.

With more intensive storms and rainfall, some of these areas have become or are becoming more prone to flooding compared with other houses in the same streets. Overtime this is highly likely to get worse.

Those at the low points of catchments may now pay a high price during heavy rains, particularly in response to the extensive non permeable hard stands that many renovations and new builds include.

Given this, zoning needs to be able to require more of renovations and new builds and also buildings in the at risk catchments below them (including not building, or removing buildings).

It also needs to be able to prevent further intensification at low points of catchments.

This requires either very specific zoning, or clear, strong criteria, in plans that development proposals must meet.

C - Transport infrastructure, and services The Council and Auckland Transport (AT) need to ensure that intensifying areas are well served by public and active transport infrastructure and services. This is particularly the case and more remote, and often lower socio-economic communities. In some cases creative solutions need to be investigated in such areas to support climate friendly transport.

In addition infrastructure and services need to be protected from flooding and other adverse weather/ climate events and be resilient. This helps communities and individuals to rely on more climate friendly modes of travel.

D - Council requirements and flood risk, etc The Council also needs to consider how its own requirements may worsen the flood risk in lower parts of catchments. For example, requiring hard, concrete stands for parking in most or all locations, increases run-off, particularly during storms.

While I accept that some parts of driveways may need to be concreted, in past decades a much more flood resilient approach was taken, with the use of gravel, concrete blocks, or other permeable blocks etc. These also have the advantage of at times enabling tree or shrub planting, which can further reduce the rate of water run-off.

Traditionally, the Council has prevented communities from planting grass verges. While in some streets the Council has planted trees, residents are not supposed to do so.

Auckland - and the Council - need a more flexible approach to planting on grass verges.

This could support a number of outcomes. It could well help retention of water during heavy rain events. It could also help improve the amenity of many of those living on the planted up streets, particularly where there is little opportunity to plant on private land, as is more likely in the future.

I was heartened by seeing the planted grass verges at the bottom bottom of Anglesea Street, where it becomes Beresford St West, and on lower Hepburn Street, including around the community centre.

I would like to see the Council acknowledge and welcome such initiatives.

In poorer communities, the Council could even consider helping fund them, to support communities wishing to undertake such planting.

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

I support focusing development near local centres.

However, for such centres to work effectively for their communities, they need appropriate community facilities.

I am very fortunate that in my local community of Herne Bay, Ponsonby, Grey Lynn. There are a number of community assets that I can easily access. These include two libraries, at least three halls, several large parks, and some smaller parks, access to a number of small beaches, as well as a number of reasonably frequent bus services.

I am very blessed!

In contrast, in Northcote Central, which is being intensified with new social and affordable housing and more market housing, there are far fewer amenities, and no community hall of any real note. This is also the case in many other poorer communities.

The Council needs to do a stock take of its different local centres and communities, to see what facilities each centre has, what facilities should be provided, and how resilient each local centre is to flooding, etc.

Unless local centres have easy access to appropriate community facilities and services, they will be unlikely to be able to achieve what the Council envisages. This includes public and active transport referred to above.

Given the above, I strongly support the strengthening of Auckland‘s strategic framework, and the spatial outcomes, particularly in terms of ensuring that disparities in our differing communities and investments are addressed.

We need to support our communities of greatest need, for example by insuring they have sufficient facilities such as community halls that can act as hubs and libraries as well as parks and sports grounds and well connected areas. We also need to acknowledge the many advantages that other communities already enjoy.

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

A - Adaptation Response to Climate Change and Downzoning I strongly support the Council in its adaptation response to climate change (FDS, p 17.) Within this I strongly the approach of avoiding future growth in areas exposed to significant risk.

This includes strong support for the down zoning of areas likely to be prone to natural hazards, for example, flooding etc in the future, including at Takaanini and Hatsfield Beach.

Over time, given climate change, the risks are likely to compound. It is important that the Council and the community focus growth in areas that will work well over the next hundred and more years.

B - Sea level rise and flooding

I am extremely concerned to see that the Council is only planning for a sea level rise of two metres.

This is unrealistic, given the lack of strong, concerted action on climate change in Aotearoa/ NZ at both national and local levels, and mixed action around the globe.

Experts are now pointing out that we are expected to exceed our target of keeping global heating to 1.5–2°C within the next few decades; it is this target that has been expected to constrain sea level rise.

The United Nations Secretary General has indicated that the planet could well reach 3- 3.1°C of warming, given the current trends in global emissions.

This higher figure is expected to result in far more, severe storms, and is likely to trigger the melting of significant ice sheets, in both the northern and southern polar areas with significant impacts on sea level.

Will Auckland be able to exist as an effective, competitive, metropolitan area, given greater and increasing global warming, with far greater sea level rise than we are currently planning for?

The people of Auckland deserve to be told clearly and explicitly whether or not this is the case - and what we need to do about it. We need a discussion!!

Information is power.

It is easy to discount the future, given difficulties in the present. We have effectively done that for the last 30 years.

Auckland - and the planet - cannot afford to take the same approach over the coming decade, or even the next 30 years.

Please act now to get the discussion going, to raise awareness, to protect our future.

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

I strongly support prioritising investment in nature-based infrastructure across communities, that is restorative, regenerative, and Mauri or Life enhancing.

This is likely to be a huge job.

While the Council should lead and provide expert advice and financial support, it should do so while also building partnerships with communities who can be actively involved.

Involvement may well look different across different communities. Such involvement may not only support the restoration of nature and help deal with climate change, but also support individual and community wellbeing, cohesion and engagement.

In terms of the adaptation response I strongly prefer natural to hard buffers. If hard buffers such as sea walls and stop banks are to be considered, it should be on a “no or low future hazards and no regrets” basis.

Overseas experience shows that when hard buffers are built, developers and residents may then want to build up to the buffer. Given that hard buffers may well fail in the short, medium, or longer term, they can make the risk worse, while costing a lot of money.

Proposals for hard buffers, need to explicitly consider the risks and costs they may pose once they are unable to act as a buffer.

Other feedback

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

5 Other feedback

The Council needs to do far more to take a leadership approach within the Auckland community on climate change. I accept that the FDS relies on some Council and other work in the climate change area, but by itself, it is grossly insufficient.

It is easy to see it as a central government led issue, and/or a technical issue.

However, the future of Auckland – as well as the rest of Aotearoa/ NZ and the planet – is at stake.

We need leadership at all levels.

We need a multifaceted discussion in Auckland about our future.

The Council could help provide this in Auckland by investigating and making clear what different levels of climate change would be likely to mean for sea level rise in the Auckland region, and thus for our coastal communities, and impacts across our wider communities from, for example, changing groundwater table levels, higher wind speeds, etc

At the same time, it would do well to investigate how well protected our strategic transport and local networks are likely to be with greater extremes of weather and sea level rise.

What would it mean for existing regional, city, or local parks and infrastructure? What might it mean for the very diverse, communities across our metropolitan region, particularly for poorer communities, with fewer resources and less access to a wide range of infrastructure, including community, hubs, and halls that may become increasingly important if communities are under threat from extreme weather events.

It would also be helpful, as indicated above, for the Council to do a stocktake of its own requirements to consider whether they are fit for purpose, given the need for climate resilience (for example, the avoidance of unnecessary hard stands for parking etc).

Future Development Plan 2023 #8565

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Tell us why

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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.

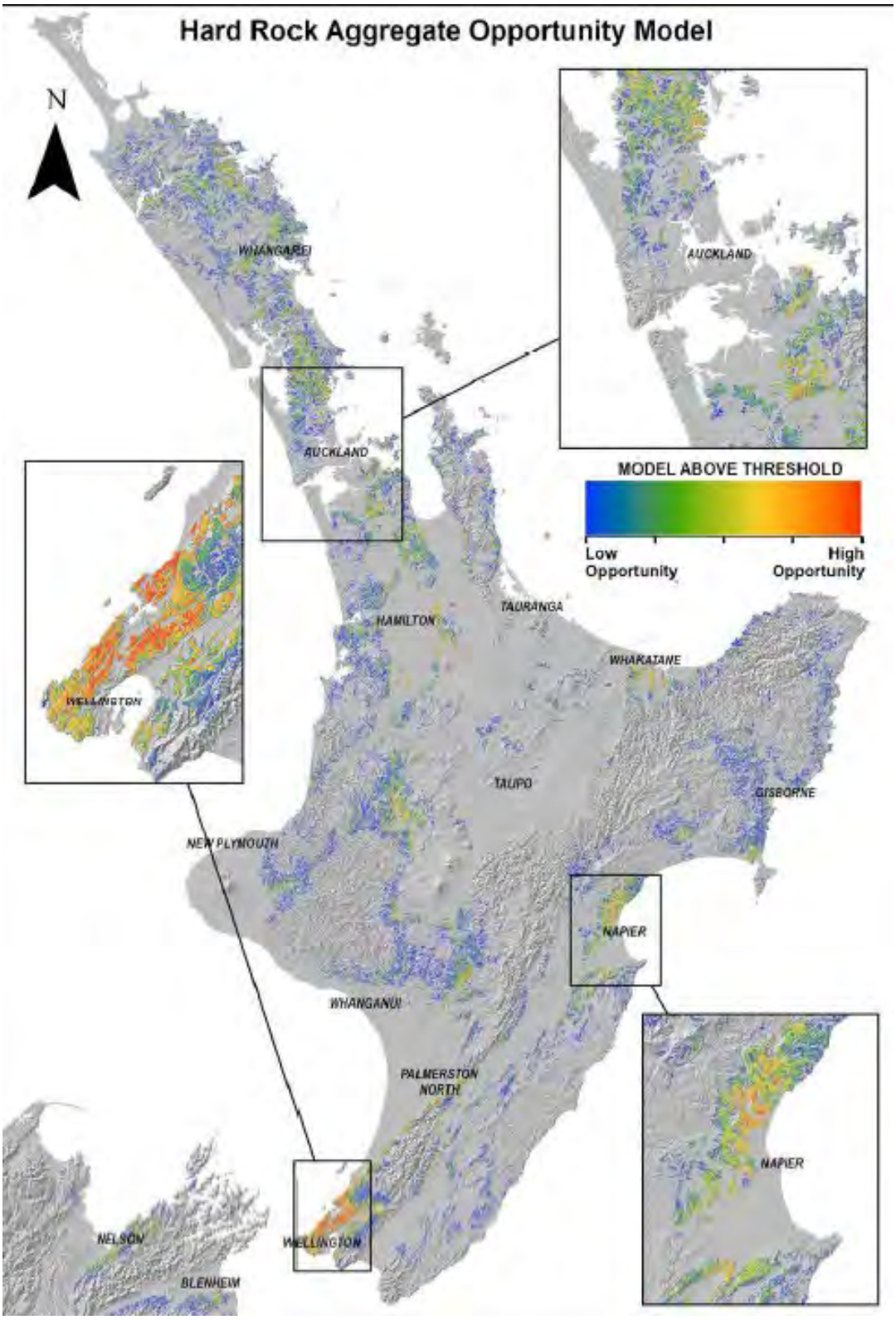
Aggregates have had an essential role recently as part of the post cyclone and flood rebuild.

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
WELLINGTON
HAMILTON
TAURANGA
WHAKATANE
TAUPO
GISBORNE
NEW PLYMOUTH
NAPIER
WHANGANUI
PALMERSTON NORTH
NAPIER
NELSON
WELLINGTON
BLENHEIM

Future Development Plan 2023 #8566

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Your feedback

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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

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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?

Please refer to the attachment

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Tell us why

Other feedback

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Tell us why

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Please see attached submission

Russ Hart and Megan Morgan - Submission on Draft FDS Proposal

We are the owners of [redacted] and we do not support the current FDS proposal to remove future urban zoned areas which had already been finalised after many years of extensive public consultation and hearings (with input from multiple scientific studies and reports).

Our whanau has endured more than 15 unsettled years, with no ability to plan for our futures with any certainty in regard to the long term plans for Drury. It has taken a toll on the mental health and financial situation of ourselves, our neighbours and wider community.

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

The Council's own approved Structure Plan for the Drury and Opaheke area was **finalised** in August 2019, which is less than 4 years ago, after multiple studies and public consultations. At this point the residence of Drury finally had the ability to make plans and move forward. For over 15 years we had put aspects of our lives on hold. After spending many hours considering kaitiakitanga, going to public meetings, giving access to our properties, sharing our knowledge of the area and assisting the council to find a way forward, the council had a **finalised** plan.

It was always clear that there are areas which are affected by possible flood plains, however this is the completely unmitigated scenario with no engineered drainage systems or improvements in place. Note that there are also huge areas which are not within these potential flood plains at all. The council itself has had multiple specialist studies and reports done for this area including comprehensive stormwater management plans, geotechnical reports, ecology reports, landscape reports, sustainability reports etc. These studies that were done in this area were carried out by some of the largest and most respected environmental and engineering consultancies in the country. None of these expert reports have recommended the removal of the future urban zoning or have stated that this land cannot be used effectively for urban development. The professional advice within these reports is that development offers significant opportunities to reduce stormwater issues and actually enhance the environment. The Council itself commissioned this detailed investigation and this is the expert advice received.

In some areas, where it is not feasible to economically mitigate these hazards completely, the mechanisms to prevent building in such areas are already in place through the consenting processes. Therefore, there is already absolutely no risk to the council or to the public that any building will be permitted in areas that will be affected by any unmitigated hazard risks. We are strongly against a rushed FDS strategy that ignores all the previous expert studies and reports which we as ratepayers helped pay for. It is not rational or appropriate to entirely remove huge chunks of already approved and zoned future urban areas without any sound scientific basis.

In 2019 when council **finalised** the Unitary Plan and Structure Plan for the Drury and Opaheke area, residence finally had some degree of stability after many years of uncertainty. It would be

irresponsible, unethical and unfair for the council to support the FDS proposal to remove future urban areas. The economic consequences will destroy livelihoods and have a detrimental impact on whanau wellbeing, whanau who have relied on the council's very public **finalised plans.**

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

[redacted]

Future Development Plan 2023 #8569

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Tell us why

Please see attached submission

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

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

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Tell us why

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

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

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

Tell us why

Other feedback

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

Please see attached submission

Submission to Auckland City Council about the Future Urban Strategy.

[redacted]

Dated 21 July 2023

We have written this submission to the Auckland City Council as you are the ones charged with upholding the Purpose Statement of Local Government.
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The points we wish to make are as follows:

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2. Since the imposition of the original FUZ we have not been able to subdivide, build any buildings, or undertake productive enterprises. Essentially, the Auckland City Council locked up the land so that the town could develop in a planned fashion in the future. This inability to do anything much on the land has led to the degradation of the land and unconsented developments occurring in these FUZ areas.
3. As a consequence of this FUZ, the land values have escalated and of course so have the rates. These extra rates have been paid by owners over the last decades. Guess where the money went. To delay the 'zone' change of this initial FUZ, for another possible 25 years, is unfair, as there is a social contract already in place. It is possibly illegal.
4. The original FUZ was much smaller than the one placed on the maps of the Spatial Plan that was accepted by the Auckland City Council. The very enlarged area that was included in the Spatial Plan, could accommodate 25,000 people. But we understand that this extended

area was drawn by simply putting a line around our towns, by two people with no planning expertise, and no community consultation, hence the inclusion of the flood plains on your very small maps. We would suggest that this is the area that should be looked at, as it is the area that will not be needed for many years. From our experience this land could well be rezoned, lifestyle, with a condition that future possible roads etc be identified and buildings restricted to areas that will not inhibit future development. If this was done, we don't think the valuations would be markedly different from the present. Whereas the values of the original FUZ around our towns of Huapai and Kumeu would markedly depreciated.
6. The Auckland City Council planners have not provided calculations to prove that infill is cheaper than Greenfield development. Nor has the required capacity of the present infrastructure ability to cope with the necessary proposed infill been calculated. Retrofitting would be more expensive than Greenfield development and would create terrible disruptions to existing city communities. Interestingly the word community does not appear in the Auckland City Council Act.
7. The proposal to infill would require lots of expensive land purchases, demolitions and disruption to the existing communities and would lack the provision for industrial/commercial land whereas Greenfield development would be able to be planned to provide such land.
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18. The justification by the Auckland City Council Planners to focus on infill in the city is based on the cost of infrastructure in the Greenfields development. In the case of our FUZ, the infrastructure is availiable and planned for, Westgate and Norwest developments are close by, we have public facilities and a large Agricultural and Horticultural land holding. The missing infrastructure is suitable transport investment.
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19. The proposals will put severe strain on FUZ landowners, especially those like us who have suffered under a FUZ for many decades. It is simply contrary to the Governing Acts, it is unfair and in our, opinion illegal.
20. Defer the FDS until plan change 78 is resolved.
21. Before a comprehensive infill takes place in the Auckland City, the capacity of the existing infrastructure must be calculated and if inadequate then the analysis should show the extra costs of the required extra infrastructure.
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Future Development Plan 2023 #8570

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Future Development Plan 2023 #8571

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Other feedback

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

Please see attached submission

#8571

Draft Future Development Strategy – Submission by [redacted]
27 July 2023

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1 Summary of Submission

This is a submission by [redacted], who are Landowners in Warkworth South and supporting applicants of the Warkworth South private plan change, to the Auckland Council's 'Auckland Future Development Strategy 2023-2053' Consultation Draft (**FDS**).

The submitters strongly oppose the FDS, both as it relates to the Warkworth South area including Warkworth South-East and generally.

In the submitters' view, the FDS:

a) Fails to take into account key planning infrastructure and financial investment relating to the Warkworth South area
b) Fails to sufficiently take into account the opportunity and growth potential of Warkworth as a sub-regional economic and employment hub. Constraining the opportunity for Warkworth growth not only detrimentally impacts investment in the region but has a direct impact on the Warkworth community and local businesses that have relied on the well-established growth strategy for the area with the associated opportunities, infrastructure and services that growth brings
c) Fails to sufficiently consider the intent and the defined medium to long term strategy outlined in the Auckland Plan, the Auckland Unitary Plan, the Future Urban Land Supply Strategy 2017 (FULSS), and the Warkworth Structure Plan 2019, with associated Assessment Reports. Given the overwhelming time and resource expended to agree on the FULSS, any proposal to depart from that must be supported by comprehensive research and analysis that:
    - Clearly establishes the case for change
    - Proves that the FDS is a superior way forward.
d) Fails to consider the extensive Warkworth South planning documents and associated Assessment Reports that have been submitted to Council and which have also been relied upon by Supporting Growth Alliance (SGA) to provide the required transport network in Warkworth South
e) Takes an overly cautious approach to perceived natural hazards that does not allow for projects to demonstrate they can avoid, remedy, or mitigate the risks from natural hazards. It should be noted that Warkworth South-East is not constrained by environmental hazards and there is no significant natural hazard risk. Furthermore, the existing policy and legal framework, requires hazard risk to be fully assessed through any proposed plan change process, thereby safeguarding new development against any and all potential risk
f) Makes incorrect assumptions on all the key reasons identified in the FDS for recommending that Warkworth South requiring further investigation and deferment of the rezoning. The Future Urban zoned land at Warkworth South including Warkworth South-East is well placed to deliver a range of housing options in the future. It is close to infrastructure, a local centre, employment options and education facilities and is part of Warkworth town and well serviced by the local and wider transport network
g) Substantially over-estimates the capacity of Auckland's existing urban areas as well as Aucklanders needs, on the basis of an incomplete and inaccurate evidence base, thereby underestimating the need for greenfield development and a balanced approach needed to meet Auckland's projected population and Aucklander's requirements over the next 30 years
h) Has not been prepared on the basis of an adequate and complete Housing and Business Development Capacity Assessment (HBA) as required by the National Policy Statement for Urban Development 2020 (NPS-UD). There is no factual or evidential basis to support the

approach set out in the FDS. The 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 Warkworth South area is zoned Future Urban in the Auckland Unitary Plan (AUP) and has long been identified as a key strategic growth area for Auckland. The submitters have significantly invested in the future development of this land based on Council's planning documents including the Auckland Plan, the AUP, the Future Urban Land Supply Strategy 2017 (FULSS) and the Warkworth Structure Plan 2019, which directs Warkworth South to be 'development ready' by 2028-2032.

A private plan change to give effect to these planning documents is currently before the Council. This includes a funded proposition to provide necessary infrastructure and the avoidance or mitigation of any potential risks from natural hazards. This private plan change will deliver the outcomes sought through the Auckland Plan, the Auckland Unitary Plan (AUP) and the Warkworth Structure Plan 2019.

The Warkworth South area is suitable, appropriate, and ready for development.

The submitters' requested relief is detailed in section 5 of this submission. In short, they seek that the FDS be amended to include Warkworth South including Warkworth South-East as a strategic growth area, to be development ready in the 2023-2030 time period.

The structure of this submission is shown in the table of contents at the beginning of the document.

2 Submitter and Warkworth South

2.1 Submitter and Land Ownership

This submission is by Karen and Stefan Richardson who are owners of [redacted] Warkworth.

The maps below show the land holding of the landowners in relation to Warkworth and Warkworth South plan change.

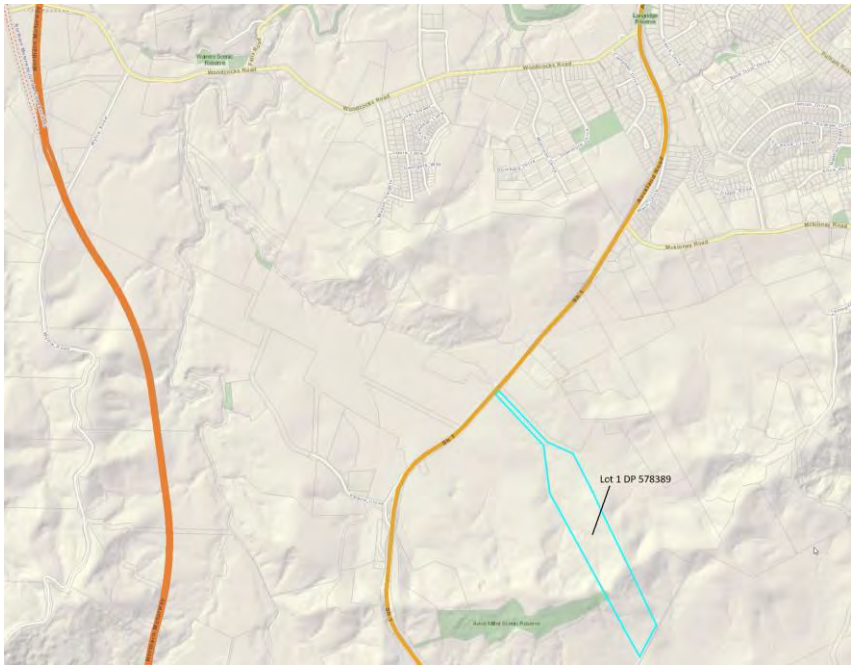


Figure 1, Land Ownership, [redacted]



Figure 2, Land Ownership in Warkworth South Plan Change

The applicants own 13.26 HA of land at Warkworth South. They are advocates of the Warkworth South private plan change which has been lodged with Auckland Council.

2.2 Warkworth South

Warkworth South is zoned Future Urban in the AUP. It is included in the Warkworth Structure Plan and the FULSS as being 'development ready' by 2028-2032.

The FDS delays this timing to 2045+ and recommends it for 'further investigation' on the basis of having 'moderate exposure to hazards, and [the need] to consider other factors such as infrastructure delays and/or VKT reduction...'. This is discussed in more detail in 3.1.

Warkworth South is in close proximity to employment nodes in the industrial area on Woodcocks Road and also to the Grange. There is direct access to Warkworth town centre as well as good access to New Zealand State Highway 1 motorway.

The land is close to education establishments including early childhood learning centres, Mahurangi College and the tertiary opportunities provided through Manukau Institute of Technology campus facilities in Woodcocks Road.

Warkworth provides significant local employment opportunities as well as significant growth opportunities, as outlined in 3.1.3.

2.3 Warkworth South Private Plan Change

KA Waimanawa LP and Stepping Towards Far Limited have lodged a private plan change request for live zoning of a substantial portion of the Warkworth South area including the Submitters' property located at 1768 State Highway 1. This plan change is consistent with the Warkworth Structure Plan. It will be development ready in the timeframes identified in the current FULSS. The proposal includes funding of the necessary infrastructure.

The full plan change and the technical assessments that support it including planning, ecology, geotechnical, infrastructure and engineering, stormwater and transport are lodged with the Council. Consequently, that information is not repeated here.

The Warkworth South plan change is a comprehensive proposal involving rezoning of the land as shown on Diagram Figure 3, Warkworth South, Proposed Rezoning,

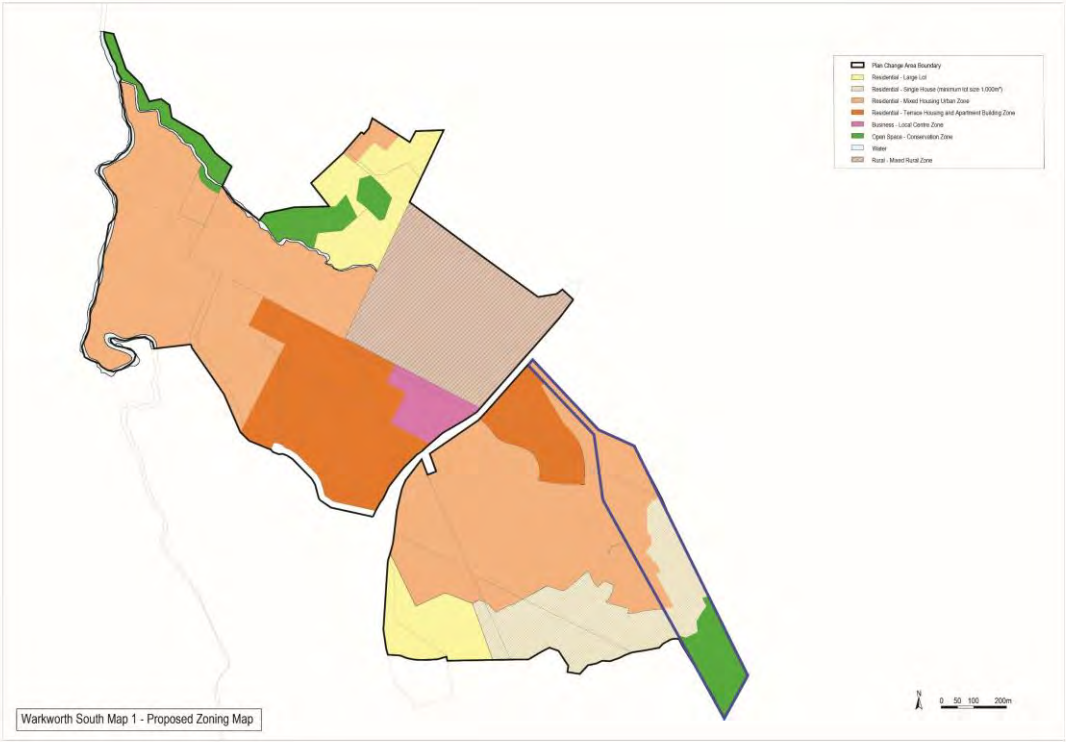


Figure 3, Warkworth South, Proposed Rezoning

The precinct plans addressing the overall planning aspects of the precinct and ecological, stormwater and transport aspects. The overview Precinct Plan are shown in the figures below.

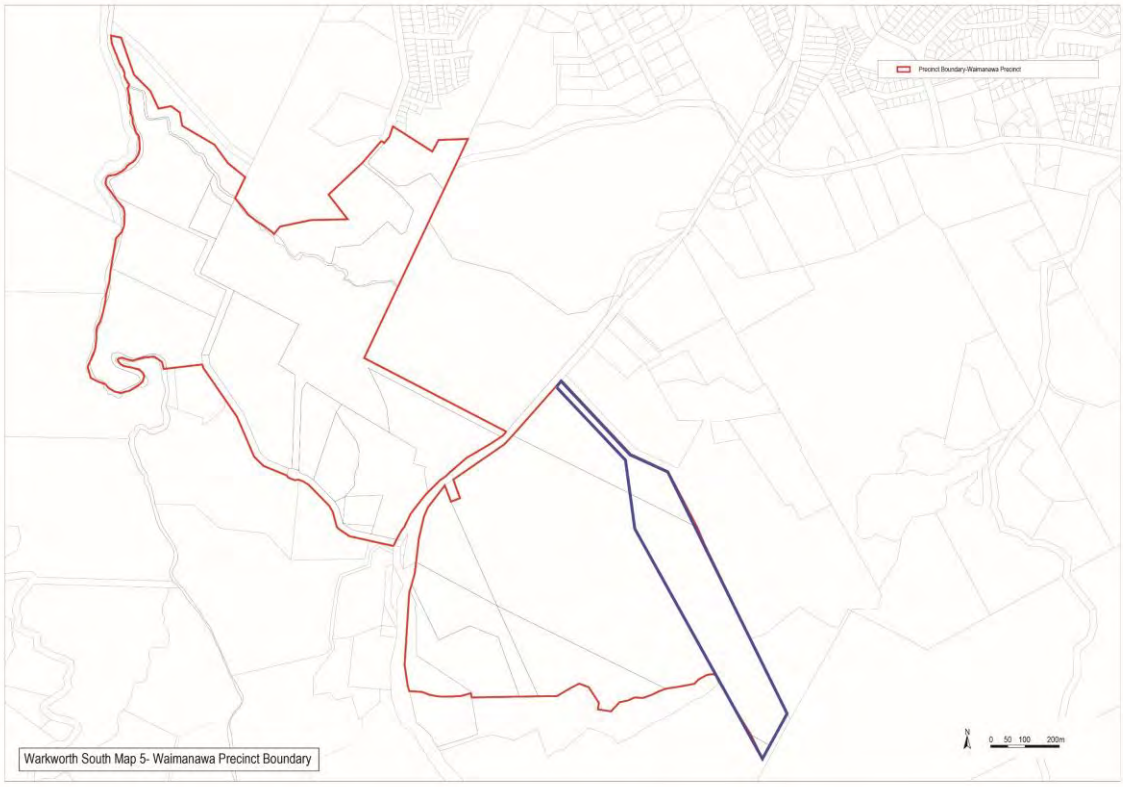


Figure 4, Warkworth South Precinct

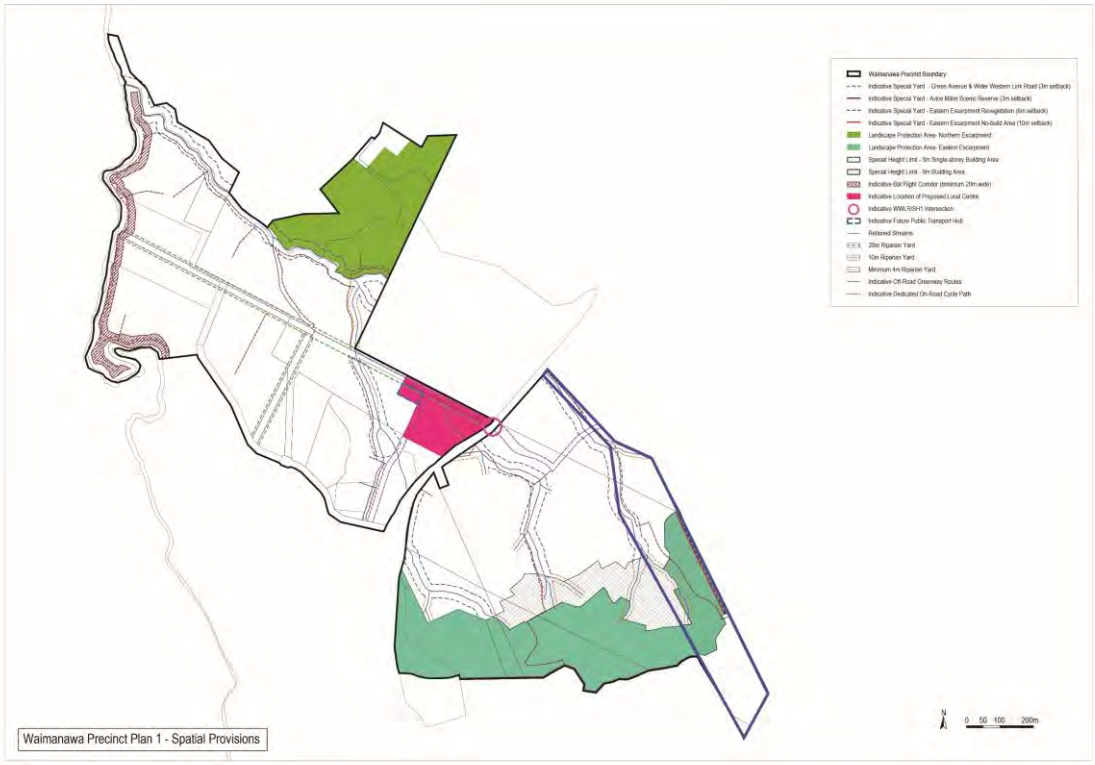


Figure 5, Warkworth South Precinct, Spatial

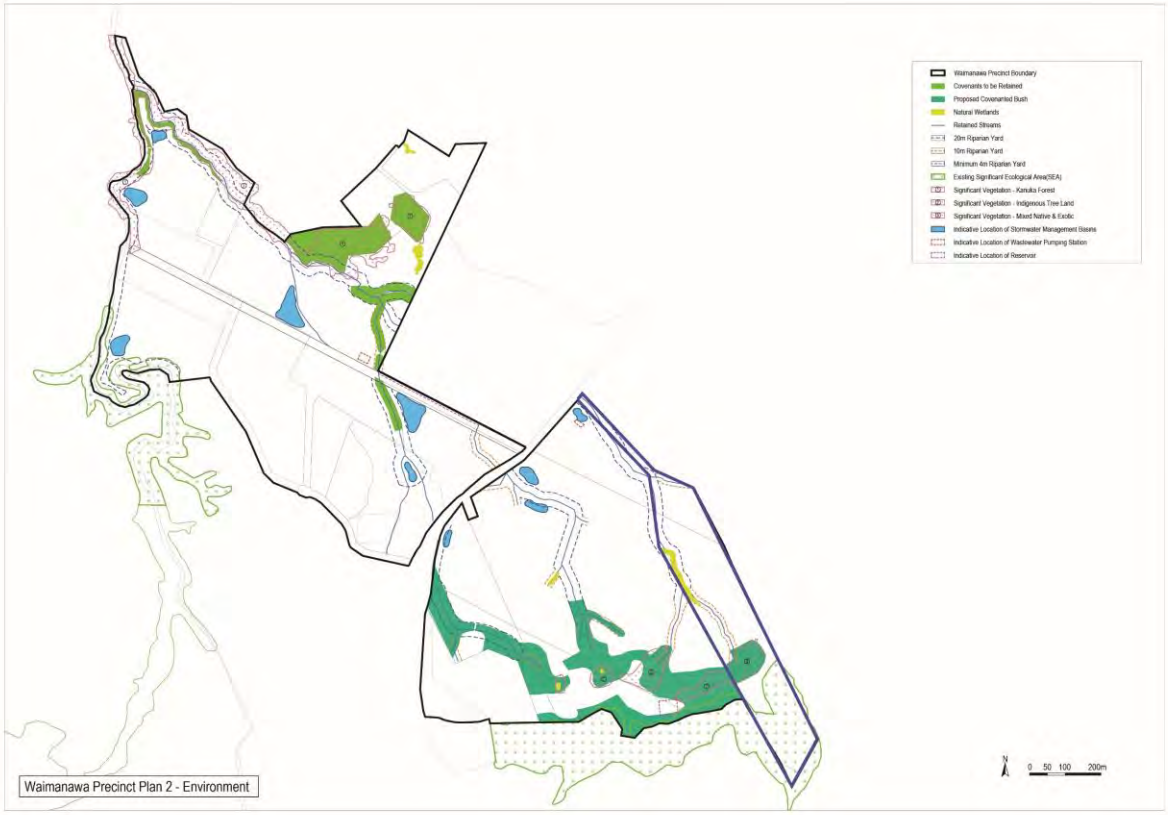


Figure 6, Warkworth South Precinct, Environmental



Figure 7, , Warkworth South Precinct, Transport



Figure 8, Warkworth South Precinct, Open Space

This plan change includes a funded programme to provide the necessary infrastructure to service the plan change area. Key infrastructure is futureproofed to service future expansion of Warkworth South.

3 FDS and Warkworth South

The FDS sets out a proposed framework for urban development of Auckland as a 'Quality Compact City'.

The FDS, as it stands, reflects not only a redefinition of the interpretation of a 'Quality Compact City', as defined in the Auckland Plan, but proposes a fundamental change of direction from the policies and commitments set out in the Auckland Plan, giving a 30-year direction for Auckland's Future Growth, and built on and developed the plan and strategy over the past 10+ years.

The fundamental intent of the Auckland Plan was the need for a plan for a longer period of growth to provide a clearer picture of future urban form and ensure the best overall balance of intensification and new greenfield development for residential and business purposes. This was a requirement of Local Government (Auckland Council) Act 2009 (S79)

The Auckland Plan was subsequently reinforced through the Auckland Unitary Plan (AUP), the Future Urban Land Supply Strategy (FULSS) the Long-term Plan and the Warkworth Structure Plan with underlying objectives to provide clarity and certainty on land supply and enabling urban development to support Auckland Growth.

The effect of the FDS is to slow down, defer or remove future greenfield development, suggesting that Auckland's growth can be successfully managed within the existing urban area, contrary to the outcomes of all previous work on Auckland's growth strategy.

This strategy stems from several assumptions which appear to be based on incomplete evidence. The FDS assumes that:

a) A prescriptive rather than balanced approach to land supply and urban and business development will meet the needs of the Auckland region and its people in the medium to long term

b) The extensive investigation and planning that has been undertaken over the past 10+ years to establish a template for quality land supply and development is no longer appropriate

c) The extensive detailed technical investigation and planning that has been undertaken on Warkworth South over the past 3 years is not valid. This has been in front of Auckland Council for some months and has consistently had general positive support

d) The Council led reset in 2012/2013 to enable effective management of land supply and development to manage growth in Auckland was flawed and is no longer relevant

e) The Rural Urban Boundary (RUB) should be reinvestigated, despite a commitment that the intention of the RUB is to be a 'defensible, permanent rural-urban interface and not subject to incremental change'

f) There is sufficient capacity for Auckland's projected population growth in the medium to long term within the existing metropolitan area through proposed Plan Change 78 (PC78), whilst putting timing delays/hold on the vast majority of future urban areas. The Council itself has sought to pause (for 1 year) the PC78 process while it completely revisits PC78 due to stormwater and natural hazard concerns following the recent weather events. The inevitable consequence of this review will be less intensification (i.e. housing) allowed for in existing residential zones. Until the outcome of this review is known it is impossible to know whether Future Urban Zone (FUZ) should be altered for urbanisation. That review must be allowed to catch up for the matter to be looked at holistically

g) The current sequencing for future urban areas through the robust and mature process UAP, structure plans and plan changes is not being managed effectively. Council cannot and should not 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 the one Council led public plan change which was subsequently withdrawn

h) The future expansion of the Rural Urban Boundary (RUB) should only be managed by the Council through a public plan change process

i) There are overwhelming natural hazard concerns, particularly flooding, which drive the abandonment of some future growth areas or at least the re-examination of greenfield areas, despite the extensive investigations and decisions on managing these concerns over the past 10+ years

j) The Council's predicament on budgetary constraints and infrastructure funding should impact the long term Strategy

k) The view that core infrastructure necessary to enable land development can only be funded through Council and other public processes; and therefore, any new greenfield developments should be deferred. Given the current financial predicament it is even more important that private and public sectors work together and achieve the combination of urban consolidation, greenfields development, and the expansion of satellite towns in the greater Auckland area. The only way to solve housing and infrastructure is through partnership with the private sector. A more agile rather than restrictive strategy is called for. New infrastructure is funded through growth and is providing on a demand basis. Infrastructure is not provided first with the assumption that development will follow

Furthermore, the FDS appears to compromise the Auckland Plan Values:

a) Kindness and Generosity; The FDS does not appear to have had the transparency requisite of a fundamental shift in urban form strategy that will directly impact the current and future population of Auckland. The submission period needs to be extended with appropriate public consultation and awareness

b) Strength in Diversity; Auckland is a diverse and complex ecosystem with a population that has a strong cultural mix with diverse and complimentary needs, that need to be treated with equity. The approach taken does not appear to be equitable and needs significant further investigation

c) Creativity and Innovation; The FDS does not appear to be allowing for the creativity and innovation that is driven by private sector as well as public sector

d) Integrity; The FDS does not appear to have taken into account significant evidence based technical reports that have been supplied regarding Warkworth and Warkworth South. It has also been identified in the AUP supporting reports that 'Public opinion is generally opposed to intensification, which indicates that Auckland Council still has some work to do with communities to demonstrate that quality growth can occur.' The proposed approach appears to limit choice and to not align with the wider community needs

e) Future Generation; Our future needs to be based on a balanced approach to support the needs and aspirations of all Aucklanders, and New Zealanders

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

3.1 Warkworth South Rezoning – How the FDS Has Got it Wrong

In terms of Warkworth South, the FDS and its supporting documentation signals 'further investigation' is required and a deferment of the rezoning of the area until 2045+ as well as a review of the classification as Future Urban Zone (FUZ). The FDS gives the reasons for this as:

1) Lack of or poor transport connections including no rapid transit network and lower opportunities for mode shift
2) 'moderate' natural hazard constraints including approximately 25% of the FUA within the 1% AEP flood plain and small to moderate areas of the FUA containing some risks of settlement, liquefaction and slope instability
3) Urban form: further consideration needed to understand the role of Warkworth as a rural node and the impact of any changes on business land capacity
4) Climate change implications of a settlement removed from the Auckland metropolitan area including potential for higher vehicle kilometres travelled (VKT) and CO_2 emissions
5) Lack of infrastructure and funding for infrastructure

These points are all fundamentally flawed and each of these are discussed in the sections below.

3.1.1 Lack of or Poor Transport Connections

The Council's background report raises issues with the transport infrastructure as it relates to Warkworth South.

The references to rapid transit network and opportunities for mode shift are of limited relevance given the role of Warkworth as sub-regional economic and employment hub with its own internal transport requirements. Meanwhile, Warkworth benefits from a recently improved transport network. This includes:

a) The Warkworth Community Transport Hub opened in September 2022
b) The Puhoi to Warkworth Motorway opened in June 2023, extending NZ State Highway 1 to Warkworth

Furthermore, planned walkways and cycleways are already being developed and will continue to be developed as Warkworth South Plan change and other initiatives are realised. These are a fundamental component of the Warkworth Structure Plan 2019.

The newly opened safer, more resilient, and reliable Puhoi to Warkworth Motorway has had significant and transformative impact on the region, including:

a) Substantially moving traffic travelling between Auckland and Northland and the Mahurangi Peninsula/Matakana area, away from old State Highway 1 through Warkworth South and the Hill Street intersection, to new high quality, high-capacity roads which effectively skirt the western and northern side of Warkworth, being largely west and north of the Warkworth urban area
b) The new road linkage is now open and fully operational and has resolved all capacity issues in the area
c) The effect of this has been to remove significant traffic volumes from the Warkworth street network. It delivers a substantial decrease in the Hill Street intersection which was the bottle neck and a key constraint on transport linkages within and through Warkworth
d) It has brought significant capacity to the old State Highway 1 between Warkworth South and the town centre and on to the entrance to the new Motorway. The detailed transport

assessment by TPC in support of the plan change clearly demonstrates that there is full capacity to move north from the Warkworth South plan change area

e) Auckland Transport and the Strategic Growth Alliance (SGA) have in June 2023 commenced notice of requirement procedures to create the necessary intersections for the Warkworth Western Link Road (WWLR). SGA made a decision not to route protect the southern transport network as they were confident this would be delivered by the private plan change that has been lodged with Council

f) Warkworth South private plan change submitters will build this intersection roundabout as it gives key access to Waimanawa Hills and Waimanawa Valley (detailed in Warkworth South plan change currently in front of Council)

g) Warkworth South private plan change submitters will also fund a walkway and cycleway connection from the WWLR through to the existing footpath and cycle connections at McKinney Road.

h) The concerns leading to deferment, or review, of Warkworth South because of transport access and infrastructure funding problems, are unfounded

i) Old State Highway 1 provides good roading access north to the township, the surrounding employment and recreational district of Warkworth/Mahurangi, and connections on State Highway 1 south to Silverdale, Albany and Auckland, and north to Whangarei and Northland.

j) The pedestrian and cycling upgrades between Warkworth South and Warkworth Central are identified through the plan change process and funded as part of the plan change implementation package

k) The roundabout identified within the notice of requirement to give access from old State Highway 1 to WWLR is identified in the plan change, identified in the NoR and funded by the submitters as part of this development.

l) Warkworth South private plan change submitters will effectively fund the WWLR through to close to the boundary of the Mahurangi River headwaters as part of development of the plan change. The WWLR will be put into strategic arterial road standards including limitations on access. This will include walkways, cycleways, a two-lane road and agreed intersection points to give access to the Waimanawa Valley development as well as connection through to Wamanawa Valley.

m) The plan change provides for the bus hub to enhance public transport when population growth warrants the service. The local centre provides terminal facilities for bus based public transport.

The assumption that Warkworth does not have the prerequisite transport connections and internal transport infrastructure is incorrect.

3.1.2 'Moderate' Natural Hazard Constraints

The FDS states that delaying development of Warkworth South is in part a response to the significant weather events and flooding and stormwater issues following the January and February storm events in Auckland.

This is an overly conservative approach to managing flood risk and is in essence a knee-jerk reaction to a perceived risk, that has not considered the extensive work on flooding and overland flow within the Warkworth South area, initially through the Warkworth Structure Plan 2019 and latterly in the extensive work done on the Warkworth South plan change.

The 'Warkworth Stormwater Management Plan', Warkworth Structure Plan 2019, identifies areas of flood hazard, The assessment gives an overview with respect to potential areas needing further investigation and any required mitigation.

It is identified that Healthy Waters considers that some further, specific consideration of stormwater requirements in relation to particular land uses and locations will be required in order to ensure that an integrated stormwater management approach is achieved throughout the structure plan area. The expectation is for the technical details to be worked through and managed as land is live zoned.

This is a robust approach and proven to be successful in removing or mitigating risks at the appropriate time. It has already been proven that greenfield development over the past 10 years has been robust with respect to hazards/flood plain risk etc (far outperforming performance in Auckland Urban area).

As part of the plan change for Warkworth South, there has been detailed modelling of the flood plains, flood prone area, and overland flow paths at different event scenarios for the entire Warkworth South plan change area. The 'Stormwater Management Plan' is currently before Auckland Council with [Revision D] having been submitted in July 2023. Items to consider:

a) This is an extensive and current report that covers flooding and overland flow within the catchment

b) All flood plains within the plan change area are to remain undeveloped for housing and will mostly remain as streams or open space. Meanwhile Warkwoth South-East has no flood zone concerns or direct mitigation requirements

c) Overland flow is successfully managed through existing streams and on roads

d) There are already robust and proven Council controls in place for managing new dwellings within a flood plain. These require consent under E36 and, to reiterate, these controls have been proven to be effective through the 2023 flood events in Auckland

While there are parts of the Warkworth South plan change area that are within flood prone areas, the development of housing and roading is <u>not</u> located within these areas. All house sites sit <u>outside the flood area</u> as identified on the plan.

The report identifies a best practise approach to stormwater and overland flow management within the plan change area. The collaborating landowners are committed to this, and the plan change provisions require it.

Overland flow is managed in streams and on roads. Flood prone areas are kept free of housing. The AUP includes all the tools (objectives, policies, standards, and assessment criteria) to ensure that in future subdivision and development, housing and business is kept clear of land subject to natural hazards including flooding.

The FDS statement that 'further investigation' is required to determine whether Warkworth South can be developed is entirely unfounded. This investigative work has been done by the developer already. Furthermore, it will be subject to thorough and robust scrutiny through the plan change submission, evidence, and hearing process before an Independent Hearing Panel.

There is no debate that land developed for housing or business needs to either avoid or successfully manage the effects of natural hazards including flooding and land stability.

The RMA and existing Auckland Unitary Plan rules that would apply to any subdivision or development consent, already has the appropriate controls in place to prevent development occurring in natural hazard areas where risk cannot be successfully mitigated.

In summary, natural hazards are already comprehensively controlled and should not require reassessment:

a) Land developed for housing or business needs to either avoid or successfully mitigate the effects of natural hazards including flooding and land stability. However, the solution is not to remove future urban zoning completely where there is "possible" hazard risk. The solution is to ensure that before a development proceeds, it has been robustly tested for vulnerability to natural hazards and can demonstrate that any identified natural hazard risks can be avoided, remedied, or mitigated.

b) The existing controls are working well. Issues that occurred in the 2023 weather events occurred in areas that had been developed a substantial time ago and in existing urban and suburban areas. Those areas developed under the current AUP controls were not impacted by the storm events.

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

There is no basis on which rezoning of Warkworth South should be deferred or reassessed because of stormwater and flood management issues.

3.1.3 Urban Form: Further Consideration Needed

The Auckland Plan identify a growth strategy for Auckland based on a balanced combination of urban consolidation, greenfields expansion, and township expansion including Warkworth.

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

There is significant economic opportunity and employment generation in the northern part of the Auckland Region. Warkworth is the major hub for the northern part of the region. It provides significant opportunity for employment and the need for associated housing, in terms of rural servicing, support services, and the tourism industry as well as Warkworth's role as a developing economic hub attracting a variety of businesses and opportunities.

'Review of dwelling and employment yields', Warkworth Structure Plan 2019, shows that employment yield has been assessed and clearly demonstrates that Warkworth is not only self-sufficient on employment opportunity vs household but shows that urban and business development and growth enables Warkworth's full yield potential. Total employment yield has been assessed and clearly shows workers per dwelling meets the AUP targets. ***Warkworth has been established as a 'sub-regional economic and employment hub' and, as such, Warkworth is not only servicing the Auckland North region but is also servicing the wider rural and urban regions.***

This is requisite on developing the appropriate business zones. Warkworth is already an employment hub including a technology hub with leading edge businesses located in Warkworth. With urban development, Warkworth capability through expanding as an employment hub will be further enabled, aligning with the AUP growth strategy.

The role of Warkworth as a sub-regional and economic employment hub is already established and should not be considered as requiring further investigation or as a reason to defer rezoning.

3.1.4 Climate Change Implications

The Warkworth Structure Plan 2019 clearly demonstrates the sustainability opportunities through the plan and alignment with policies and strategic outcomes considered of most direct relevance to an assessment of sustainability through the urban and economic growth identified in the plan. These principles are followed through and aligned with in the Warkworth South plan including:

a) Planning for sustainable outcomes

b) Opportunities for enabling compact urban form and efficient use of land and associated promotion of a self-sustaining community

c) The design of green corridors to ensure multifunctional benefits

d) Walking and cycling network and the promotion of low carbon and active transport modes

The sustainability and self-sufficiency principles are built on through the planned growth of Warkworth. 'Review of dwelling and employment yields', Warkworth Structure Plan 2019, identifies that total employment yield has been assessed and clearly demonstrates that Warkworth is not only self-sufficient on employment opportunity vs household but requires that the full FUZ be developed to enable Warkworth's full yield potential. This clearly shows workers per dwelling meets the AUP targets. **Growth will result in reduced km travelled/CO2 emissions per head, <u>not</u> increased, thereby aligning with climate change polices**.

Conclusions form the 'Sustainability Assessment', Warkworth structure Plan 2019, identify that with the planned growth Warkworth promotes a self- sustaining community and region with reduced need to travel to access employment.

Warkworth South is aligned with the wider Auckland plan for Growth and sustainability due it's unique position as a sub-regional economic and employment hub supporting the north Auckland rural and urban regions without having reliance on the Auckland metropolis.

This is demonstrated with the development of a wide range of services, professional services, medical services, groceries and trade availability within the Warkworth township.

The compact size of Warkworth and the dedicated walking and cycling links through the Warkworth South plan change, provides alternative travel modes for residents. The local centre part of the development also ensures a walkable opportunity for base services / retail.

Climate change implications and Warkworth's role in the wider requirement for reduced VKT per capita are aligned with the wider Auckland strategy. This should not be considered a reason for stalling growth, based on invalid assumption.

3.1.5 Lack of Infrastructure and Funding for Infrastructure

The Warkworth South plan change and implementation programme resolves and funds all infrastructure for the plan change area and futureproofs infrastructure for the rest of the Warkworth South area. The infrastructure supports the wider economy, communities and what makes for a well functioning super city. This infrastructure will provide significant residential and business capacity in the wider Warkworth area.

In particular, the proposal funds all local infrastructure in the normal manner as well as:

a) Upgrading old State Highway 1 through the plan change area to urban road standards

b) Building a dedicated shared path walkway and cycleway from the plan change area to McKinney Road

c) The construction of the roundabout at WWLR and two-lane strategic arterial on the WWLR

d) The potable water supply line from Warkworth to Warkworth South

e) Vesting the land for the water reservoir to service Warkworth South. Securing this land will futureproof either an extension or duplicate reservoir for the rest of Warkworth South

f) Vesting the land necessary for the wastewater pump station to service the plan change area

g) Construction of the pump station to service the plan change area

h) Construction of a rising main from the pump station to the top of McKinney Road, with the opportunity to place a second pipe in the trench to service other parts of Warkworth South if developed in the future

i) Construction of a gravity line, futureproofed for all of Warkworth South, from McKinney Road to the prime Warkworth pump station

j) Setting aside land for the transport hub identified in the SGA programme and in the Structure Plan

It should be noted that infrastructure triggers including both the WWLR and the Southern Public transport interchange are accommodated for in the Warkworth South plan change. Meanwhile the opening of the Puhoi to Warkworth Motorway has had significant and transformative impact to the roading network within the Warkworth area. The close access to the main interchange and direct access to old State Highway 1 has limited the requirement for the Southern Interchange as a key infrastructure trigger. It is agreed that future growth beyond the Warkworth South plan change would benefit from this trigger.

Other core sub regional infrastructure, which is either complete or in progress and will align with South Warkworth plan change and development timeframe:

a) Rising main from Warkworth to the Snells Beach Wastewater Treatment Plant. It should be noted that this has been sized to include the Warkworth South development, so there is sufficient capacity within the treatment plan

b) Upgrade of the treatment plant

c) Ocean outfall from the treatment plant

d) Upgrade of the water supply

e) Completion of the Puhoi to Warkworth Motorway

f) Completion of the Matakana Link Road

Warkworth and particularly Warkworth South is uniquely placed to deliver the need for growth in a project where:

a) Regional infrastructure is either in place or physically in construction

b) Warkworth South infrastructure will be funded by the developer. It will also supply service infrastructure to the wider area when this is required.

Infrastructure projects in Warkworth need to be encouraged in order to meet the wider objectives for Auckland strategy around growth and land supply.

3.2 The Impact of Proposed Reversing of Longstanding Council Commitments

The current objectives and policies for Land Supply for Urban and Business development are well established and have been built on, developed, and implemented over the past 10+ years with the purpose of giving 30-year direction with guaranteed land supply to meet the strategy.

This has been managed and built on through the Auckland Plan, AUP, FULSS and the Warkworth Structure Plan.

The Auckland Plan is a key direction-setting document for the Auckland Unitary Plan. It is a comprehensive strategy covering social, economic, environmental and goals with an overall vision of making Auckland the World's most liveable city. The Auckland Plan defines the following fundamentals:

a) 30-year direction for Auckland's Future Growth

b) 60 to 70% in Existing Urban Area, 30 to 40% in Greenfield, Satellite Towns including Warkworth

c) A land supply development strategy

d) A development strategy incorporating:

- Planning for a long period of growth to provide a clearer picture of future urban form and ensure the best overall balance of intensification and new greenfield development for residential and business purposes
- The Rural Urban Boundary intended to be a permanent rural urban interface and not subject to incremental change, providing for 30 years of urban development
- Integrated planning for the staging and delivery of serviced land inside the RUB in a way that achieves **efficiency for infrastructure roll out and a reasonable degree of certainty for land owners and developers**

The Auckland Unitary Plan Objectives are clear and indisputable and specify the relevance, usefulness, achievability, and reasonableness of those objectives. Key points being:

a) Provide a more flexible and balanced approach to growth management

b) Provides for urban growth to occur in an orderly, timely and planned manner in areas zoned future urban within the RUB. This means that new infrastructure, such as water and wastewater infrastructure networks, can be planned and used more efficiently in support of land supply

c) It will allow greater certainty about where and when urban development is to occur

d) Structure planning is an important tool to help support this approach and enable successful development to occur 'on the ground'

e) Structure plan requirements for future urban zoned greenfield land within the RUB

f) The approach outlined in the Unitary Plan provides **greater certainty for developers and landowners in both urban and rural areas**.

Future Urban Zoning Enables rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all of the following:

a) Support a quality compact urban form

b) Provide for a range of housing types and employment choices for the area

c) Integrate with the provision of infrastructure

d) Follow the structure plan guidelines

As defined in the Auckland land supply and development strategy, Warkworth and specifically the Warkworth South plan meets all the intentions, objectives and criteria outlined, for effectively and efficiently managing Auckland Growth.

Significant investment has been made by multiple landowners, including the submitter, based on a consistent, repeated, reinforced Council growth strategy reflected in these documents.

The Warkworth Structure Plan and resulting Warkworth South Plan and planning has been fully based on and compliant to these guiding principles resulting in **a comprehensive plan change** being submitted to Council in early 2023. This has followed detailed investigation and reporting and engagement with Councils and public agencies over a significant period of time.

The departure from a long-standing Council policy severely undermines confidence in all of the Council's long term strategy and planning documents. Aucklanders, including business owners, developers, landowners and not for profits cannot be sure which of the strategies are here to stay and should be followed, and which are temporary (despite stating they are long term). This has significant implications for the future development of Auckland, which relies on private developers to meet the housing wider needs of Auckland and Aucklanders.

In the case of Warkworth South, the FDS either reverses or substantially defers that long standing Council commitment. This is done notwithstanding the Council:

a) Has seen such urgency in serving a notice of requirement for both:
    - Warkworth Wider Western Link – North Auckland Transport, NoR 8
    - Warkworth State Highway 1 – South Upgrade Auckland Transport, NoR 3
b) Has landowners who have clearly indicated their desire to enter an infrastructure funding agreement such as they will fund all necessary infrastructure for Warkworth South plan change area.

Not only has the Council promoted this FDS without considering this plan change request and the infrastructure proposals embodied with it; it has done this without any consultation with the submitters. Given this plan change request has been lodged with the Council for a number of months it is incumbent on the Council to directly consult with the applicants prior to this policy change.

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

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

4 Wider Implications of FDS and General Submission

4.1 General Comments on the FDS

The NPS-UD requires the Council to prepare an FDS that provides sufficient development capacity over the next 30 years to meet expected demand. This is to provide for both residential growth and business growth.

Since 2011 this has been achieved though promoting a balanced growth strategy for Auckland based on clear and substantiated objectives for targeting both residential growth and employment/business land supply through urban development within the metropolitan area, targeted greenfields expansion, and growth of Townships including Warkworth within the RUB through plan changes based on the established structure planning processes.

This has been consistently reinforced through the Auckland Plan, Auckland Unitary Plan, FULSS, and Structure Plans including the Warkworth Structure Plan.

The private sector, through private plan changes, has funded and provided for these developments. A number of these areas have been successfully developed following private plan changes. None of these areas have exhibited any geotechnical or flooding issues through the recent extreme weather events. The current policies, provisions and required assessments are effectively managing environmental risk. Greenfield developments, which are carefully master-planned, and coordinated with Council input will perform exceptionally well to climate change and natural hazards. Good development done well should not be discouraged or mandated against.

The primary concern with the FDS is that this is being rushed through without appropriate thoroughness. The impact of what is being proposed in the FDS is fundamental to Auckland's Urban Form and Growth Strategy and should not be rushed through.

If the FDS is pursued in its current form, then it will trigger the unintended consequences, including:

a) Further constraining residential and employment land supply.

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

c) Significantly and negatively impacting housing affordability through land supply constraint.

   - Directly impacts housing affordability by raising land value expectation and ultimately housing cost
   - Through a healthy and balanced over zoning these distortions will not occur
   - The unintended consequence of the FDS will be land supply constraint
   - This is contradictory to the direction from central government through the NPS-UD and providing sufficient capacity to improve housing affordability

d) Having a demonstrable negative impact on the economic development of Auckland and the development sector

e) An overall negative impact on Aucklanders' opportunities and welfare

f) Direct impact on Warkworth liveability and opportunities

It is accepted that the Council has financial constraints which are negatively impacting infrastructure provision. However, the solution is not to try and stop greenfields development which are being enabled by Private Plan Changes. If the problem is funding infrastructure, then the solution is to use alternative ways to fund infrastructure such as developer funding and the use of the Infrastructure Financing and Funding Act 2020.

From a coordination perspective this is already being managed through the current processes outlined in the AUP through Structure Planning and appropriate coordination with Council for infrastructure and live-zoning.

In terms of capacity assumptions, the FDS is based on theoretical and unrealistic scenarios for growth potential within the existing urban area. This is assessed using 'plan-enabled' and 'feasible' capacity but fails to assess whether this capacity is reasonably expected to be realised (3.25(c) of the NPS-UD). This is a fundamental oversight and undermines the FDS's capacity assumptions. While theoretical models can be created to imply a decade's worth of growth within the existing urban area, the reality is that this is not available, and history has proven that this level of growth has not occurred. The asserted development potential to a large extent (but accepting proposed PC78 may free up more development) has been in place for the last ten years. Urban consolidation is a significant contributor to Auckland's growth. However, it is not the complete answer.

The strategy does not produce enough housing or the required balance to meet the needs of the Auckland and wider population:

a) The FDS is based on assumptions that there will be a large uplift in capacity in urban areas from PC 78. However, PC78 has been paused to allow time for Council to complete flooding and natural hazard assessments. These assessments will inevitably lead to a reduction in capacity provided for through PC78 in the existing urban area. As a result, there will be implications for the capacity required in greenfield areas to meet forecasted demand. When PC78 implies an approximately 2.345 million dwellings as a theoretical potential, it is based on unreasonable assumptions.

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

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

    - The FDS identifies budget constraints and indicates an inability to solve infrastructure. The solution appears to be to slow down or stop growth until the financial position allows for the next phase of infrastructure funding
    - The fundamental issue of Auckland's growth and need for employment land housing land does not appear to being considered
    - The FDS should focus on continuing to work with the private sector to solve infrastructure problems
    - Central management, by constraining balanced land supply and growth distorts the market and results in uncertainty and unintended consequences including policy changes that contradict the fundamental Auckland Plan of giving long term certainty through a balanced and pragmatic approach
    - Rather than taking a broad sweep approach to greenfields and satellite towns land supply, the focus should be in supporting land supply on a case by case basis through making use of a variety of ways of funding infrastructure and enabling growth rather than constraining growth. There are options available which should be supported, such as private sector funding, PPP models, infrastructure funding agreements around managing the development contribution model etc
    - The FDS appears to assume none of these are applicable or workable. Energy should be put into identifying innovative proposals for targeted growth areas

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

e) The FDS relies heavily on urban consolidation which in turn relies on PC78 but:

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

The FDS has been prepared in isolation without adequate consultation with the development community, mana whenua, infrastructure delivery partners and funding providers. What this shows is that:

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

b) This has been embraced by the community including the development community

c) Very substantial investment decisions have been made based on this Council commitment

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

e) This has delivered additional growth for Auckland

f) None of the developed private plan change areas experienced any issues with flooding events or geotechnical problems. The system worked and is working. In contrast, there has been widespread flooding throughout urban areas caused by insufficient infrastructure

g) The private sector community has funded the necessary infrastructure to service these greenfield areas. It is recognised that the Council does face future funding constraints, this can be addressed through private sector collaboration

4.2 The Auckland Future Development Strategy (FDS)

a) The submitters accept that a FDS is required under the NPS-UD but do not support the Council's proposed draft and consider that it is based on an inadequate and insufficient evidence base

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

c) The FULSS has worked reasonably well in informing and directing the location of growth, albeit that the strategy has not been responsive enough to the pace of growth and Council has not had the resources to fully implement it. 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 the one Council led public plan change that was subsequently withdrawn.

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

5 Submitters Requested Decision

The submitters request:

a) The Council pause the current programme on the FDS to allow for thorough and objective review of the strategy
b) That Warkworth is identified as a Regional Economic and Employment Hub with associated growth strategy
c) That any new iteration of the FDS include the Warkworth South area including Warkworth South-East as a committed growth area
d) That Warkworth South area including Warkworth South-East be shown as development ready in the 2023-2030 time period.
    - It is recognised the Council may want to record that the live zoning is dependent on an infrastructure funding agreement between landowners and the Council over key infrastructure funding
    - The plan can record that as part of any rezoning, appropriate management of flood plain and overland flow will be required to ensure development sites are not within flood plains
e) Ensure there is sufficient release of employment and residential land to cater for growth
f) Enable 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 aspire to
g) That the consultation period for the FDS be extended to 12 months with an opportunity for hearings.
h) Key principles be agreed including:
    - Sufficient land must be released at the appropriate time to cater for growth
    - The continuation of a balanced approach for growth with the combination of urban consolidation, greenfields development, and the expansion of satellite townships
    - Growth needs to be serviced by adequate infrastructure
    - Infrastructure can be supplied through a broad range of options including innovative methods and participation by the private sector (investment and development)
    - Stormwater and flood plain management are important factors and need to be considered in the release of land whilst recognising appropriate methods to manage such land
    - Apply those principles on an area by area basis to identify the release of land

6 FDS Impact Response

As private landowners, New Zealanders and Warkworth residents the FDS has already had a direct and significant negative impact on our livelihoods.

We moved from Waiwera/Puhoi area to Warkworth for the following reasons:

a) To live and work in a growing town with all the facilities to support our businesses and lifestyles

b) To invest in growing town transitioning from a tourist and rural hub to a sub-regional economic and employment hub

c) To become part of the Warkworth community

d) To live and work in Warkworth through to retirement with assurance that Warkworth had the facilities to support us

e) To have certainty that Wirksworth's growth would allow us to have a return on our investment to allow for a private pension to support us in retirement

To purchase land in Warkworth we invested significant savings as land value had increased due to Warkworth's location and its position in the Auckland Unitary Plan and the associated Warkworth Structure Plan.

We purchased based on:

a) AUP delivering clarity and certainty for Landowners in the Warkworth area:
    - The RUB being clearly identified as defensible and permanent
    - Greater certainty for Developers and Landowners in both Urban and Rural areas

b) AUP Identifying Warkworth as a Growth Hub in 2013 and validating this through to 2023, based on updates and revisions of the AUP and the Warkworth Structure Plan supporting the strategy and giving required certainty to landowners

c) The Warkworth Structure Plan giving a clear 20 year timeline for land use in the Warkworth Future Urban zone

d) Professional Valuation through ASB bank, who based the valuation on the clear and well established growth strategy identified in the Warkworth Structure plan and reinforced by Council

The investment in the land has been validated by:

a) Investment in the adjacent land by a significant NZ Development company with the backing of the NZ Super Fund, with the Government as a Capital Contributor

b) Risk Management Policy identifying the area as targeted for growth and associated investment

c) Direct investment by other property developers in the Warkworth Future Urban Zone

d) Key infrastructure and service projects going live over the period of the Warkworth Structure Plan timeframes

FDS Impact:

a) AUP and the Warkworth Structure Plan directly drove land value over the past decade through perceived certainty on land supply and land development planning

b) FDS has removed certainty and has further introduced uncertainty for the long term through proposing that the current FUZ be designated ‘under investigation’ for the foreseeable future

c) FDS has devalued property immeasurably through the direct consequence of undermining 10+ years of planning and investigation

d) Significant money has been spent by the submitters on technical assessment reports and planning documentation in accordance with AUP and the Warkworth Structure plan processes and policies

This has resulted in direct personal and financial impact:

a) Introduces financial uncertainty for the foreseeable future due to the newly introduced ‘under investigation’ zoning

b) Results in devaluing property by 50 to 65% on cost paid

c) Potentially introduces significant negative equity that cannot be recouped

d) Removes choice through introducing market uncertainty

e) Reduces the appeal of Warkworth as a desirable place to live and work

The direct impact is significant financial insecurity and ongoing future uncertainty.

Future Development Plan 2023 #8572

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 seeattached submission

Accessible local centres

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

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

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

Tell us why

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 submission

Draft Future Development Strategy – [redacted]

27 July 2023

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1 Summary of Submission

This is a submission by [redacted], who are Landowners in Warkworth South and supporting applicants of the Warkworth South private plan change, to the Auckland Council's 'Auckland Future Development Strategy 2023-2053' Consultation Draft (**FDS**).

The submitters strongly oppose the FDS, both as it relates to the Warkworth South area including Warkworth South-East and generally.

In the submitters' view, the FDS:

a) Fails to take into account key planning infrastructure and financial investment relating to the Warkworth South area
b) Fails to sufficiently take into account the opportunity and growth potential of Warkworth as a sub-regional economic and employment hub. Constraining the opportunity for Warkworth growth not only detrimentally impacts investment in the region but has a direct impact on the Warkworth community and local businesses that have relied on the well-established growth strategy for the area with the associated opportunities, infrastructure and services that growth brings
c) Fails to sufficiently consider the intent and the defined medium to long term strategy outlined in the Auckland Plan, the Auckland Unitary Plan, the Future Urban Land Supply Strategy 2017 (FULSS), and the Warkworth Structure Plan 2019, with associated Assessment Reports. Given the overwhelming time and resource expended to agree on the FULSS, any proposal to depart from that must be supported by comprehensive research and analysis that:
    - Clearly establishes the case for change
    - Proves that the FDS is a superior way forward.
d) Fails to consider the extensive Warkworth South planning documents and associated Assessment Reports that have been submitted to Council and which have also been relied upon by Supporting Growth Alliance (SGA) to provide the required transport network in Warkworth South
e) Takes an overly cautious approach to perceived natural hazards that does not allow for projects to demonstrate they can avoid, remedy, or mitigate the risks from natural hazards. It should be noted that Warkworth South-East is not constrained by environmental hazards and there is no significant natural hazard risk. Furthermore, the existing policy and legal framework, requires hazard risk to be fully assessed through any proposed plan change process, thereby safeguarding new development against any and all potential risk
f) Makes incorrect assumptions on all the key reasons identified in the FDS for recommending that Warkworth South requiring further investigation and deferment of the rezoning. The Future Urban zoned land at Warkworth South including Warkworth South-East is well placed to deliver a range of housing options in the future. It is close to infrastructure, a local centre, employment options and education facilities and is part of Warkworth town and well serviced by the local and wider transport network
g) Substantially over-estimates the capacity of Auckland's existing urban areas as well as Aucklanders needs, on the basis of an incomplete and inaccurate evidence base, thereby underestimating the need for greenfield development and a balanced approach needed to meet Auckland's projected population and Aucklander's requirements over the next 30 years
h) Has not been prepared on the basis of an adequate and complete Housing and Business Development Capacity Assessment (HBA) as required by the National Policy Statement for Urban Development 2020 (NPS-UD). There is no factual or evidential basis to support the

approach set out in the FDS. The 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 Warkworth South area is zoned Future Urban in the Auckland Unitary Plan (AUP) and has long been identified as a key strategic growth area for Auckland. The submitters have significantly invested in the future development of this land based on Council's planning documents including the Auckland Plan, the AUP, the Future Urban Land Supply Strategy 2017 (FULSS) and the Warkworth Structure Plan 2019, which directs Warkworth South to be 'development ready' by 2028-2032.

A private plan change to give effect to these planning documents is currently before the Council. This includes a funded proposition to provide necessary infrastructure and the avoidance or mitigation of any potential risks from natural hazards. This private plan change will deliver the outcomes sought through the Auckland Plan, the Auckland Unitary Plan (AUP) and the Warkworth Structure Plan 2019.

The Warkworth South area is suitable, appropriate, and ready for development.

The submitters' requested relief is detailed in section 5 of this submission. In short, they seek that the FDS be amended to include Warkworth South including Warkworth South-East as a strategic growth area, to be development ready in the 2023-2030 time period.

The structure of this submission is shown in the table of contents at the beginning of the document.

2 Submitter and Warkworth South

2.1 Submitter and Land Ownership

This submission is by Karen and Stefan Richardson who are owners of [redacted] Warkworth.

The maps below show the land holding of the landowners in relation to Warkworth and Warkworth South plan change.

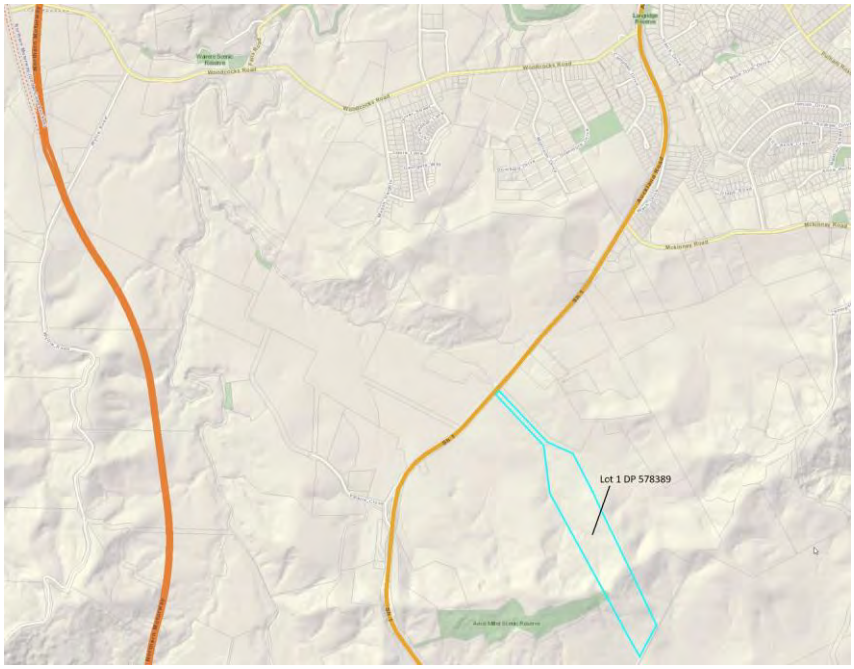


Figure 1, Land Ownership, 1768 State Highway 1, Warkworth



Figure 2, Land Ownership in Warkworth South Plan Change

The applicants own 13.26 HA of land at Warkworth South. They are advocates of the Warkworth South private plan change which has been lodged with Auckland Council.

2.2 Warkworth South

Warkworth South is zoned Future Urban in the AUP. It is included in the Warkworth Structure Plan and the FULSS as being 'development ready' by 2028-2032.

The FDS delays this timing to 2045+ and recommends it for 'further investigation' on the basis of having 'moderate exposure to hazards, and [the need] to consider other factors such as infrastructure delays and/or VKT reduction...'. This is discussed in more detail in 3.1.

Warkworth South is in close proximity to employment nodes in the industrial area on Woodcocks Road and also to the Grange. There is direct access to Warkworth town centre as well as good access to New Zealand State Highway 1 motorway.

The land is close to education establishments including early childhood learning centres, Mahurangi College and the tertiary opportunities provided through Manukau Institute of Technology campus facilities in Woodcocks Road.

Warkworth provides significant local employment opportunities as well as significant growth opportunities, as outlined in 3.1.3.

2.3 Warkworth South Private Plan Change

KA Waimanawa LP and Stepping Towards Far Limited have lodged a private plan change request for live zoning of a substantial portion of the Warkworth South area including the Submitters' property located at 1768 State Highway 1. This plan change is consistent with the Warkworth Structure Plan. It will be development ready in the timeframes identified in the current FULSS. The proposal includes funding of the necessary infrastructure.

The full plan change and the technical assessments that support it including planning, ecology, geotechnical, infrastructure and engineering, stormwater and transport are lodged with the Council. Consequently, that information is not repeated here.

The Warkworth South plan change is a comprehensive proposal involving rezoning of the land as shown on Diagram Figure 3, Warkworth South, Proposed Rezoning,

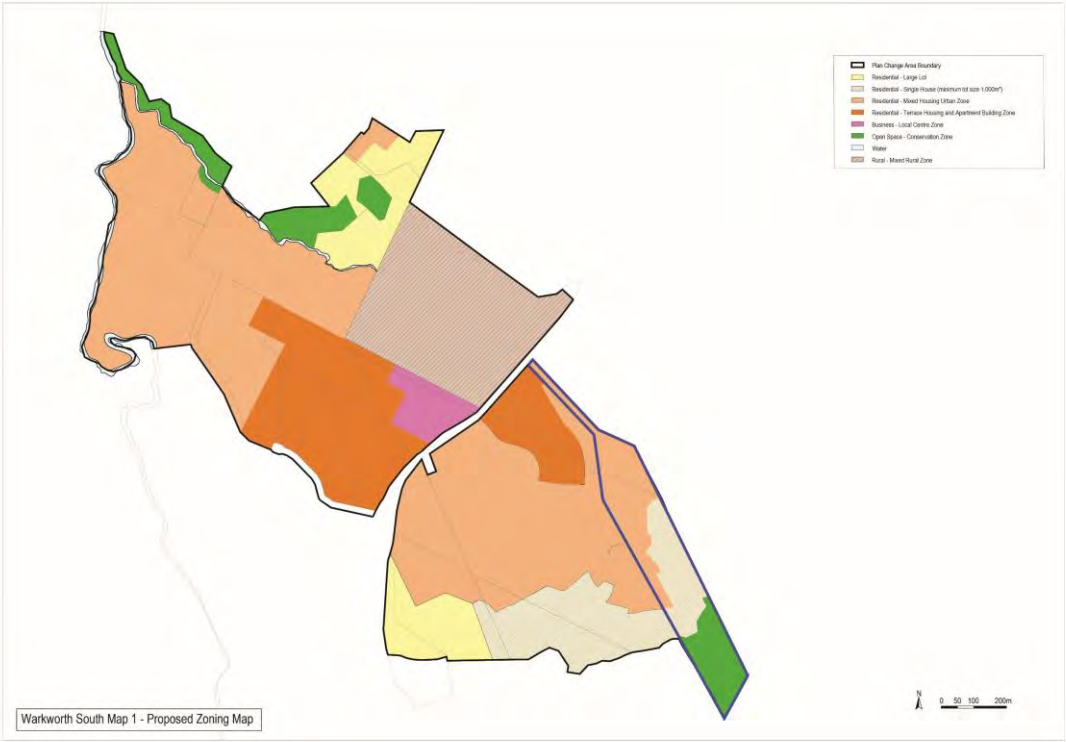


Figure 3, Warkworth South, Proposed Rezoning

The precinct plans addressing the overall planning aspects of the precinct and ecological, stormwater and transport aspects. The overview Precinct Plan are shown in the figures below.

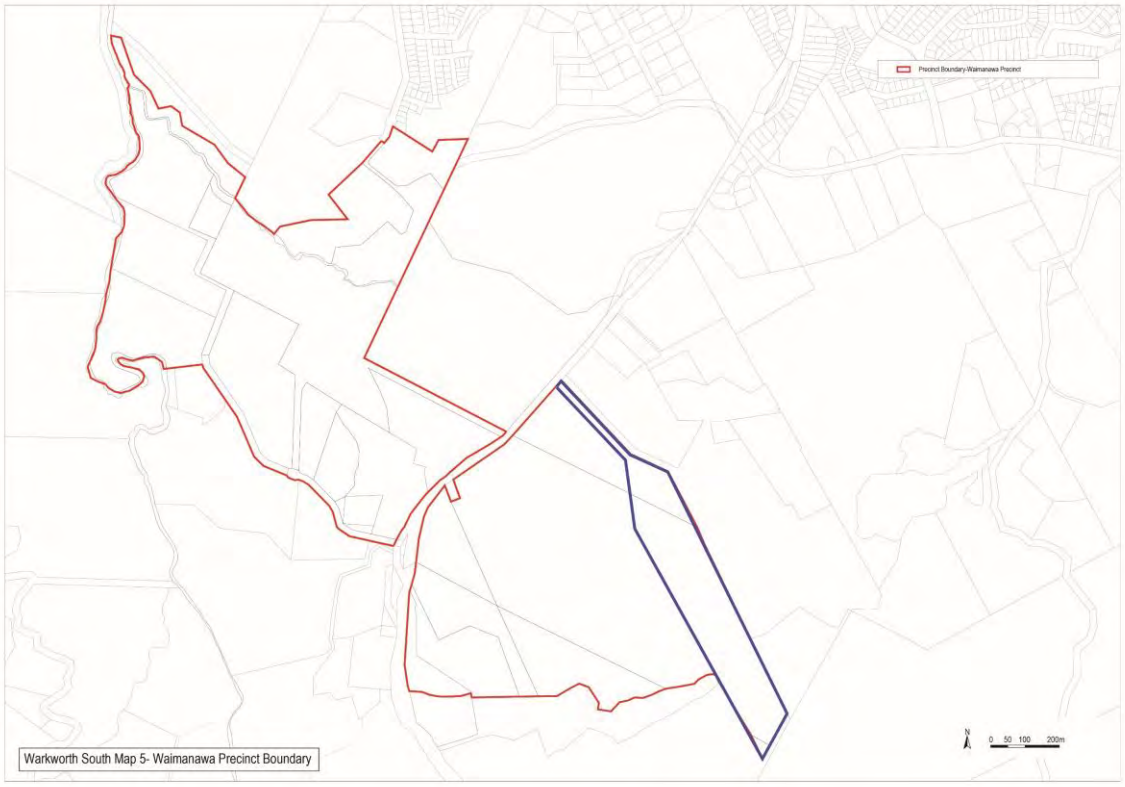


Figure 4, Warkworth South Precinct

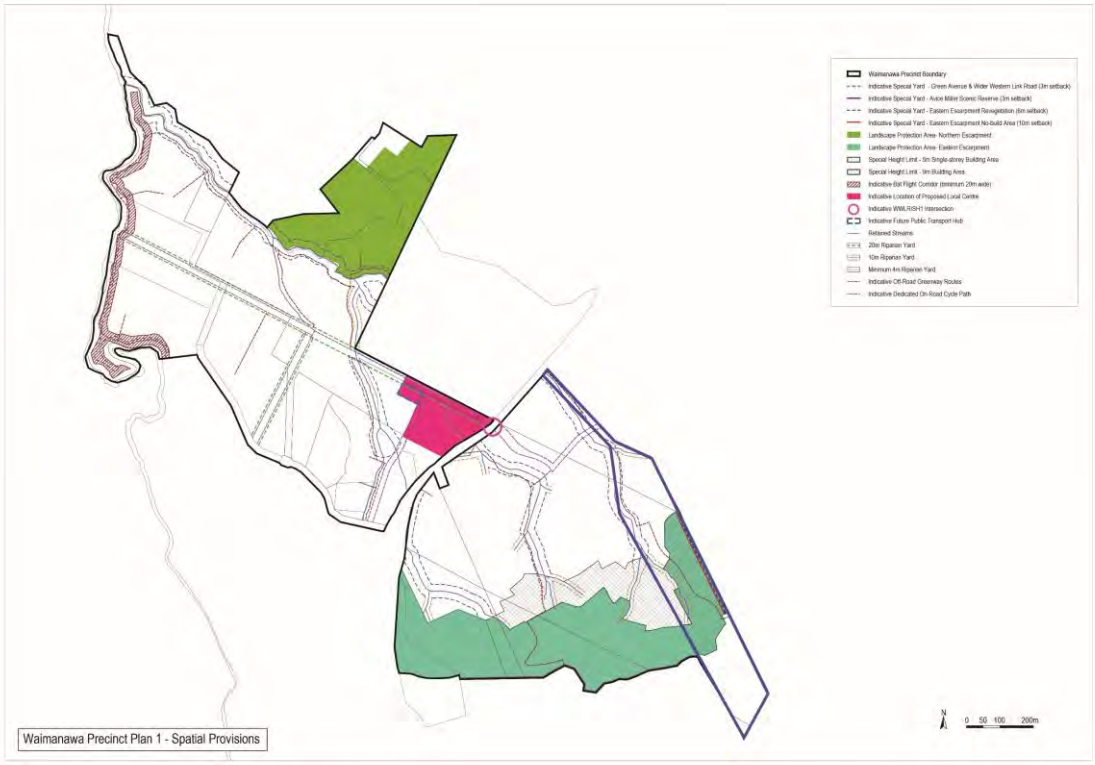


Figure 5, Warkworth South Precinct, Spatial

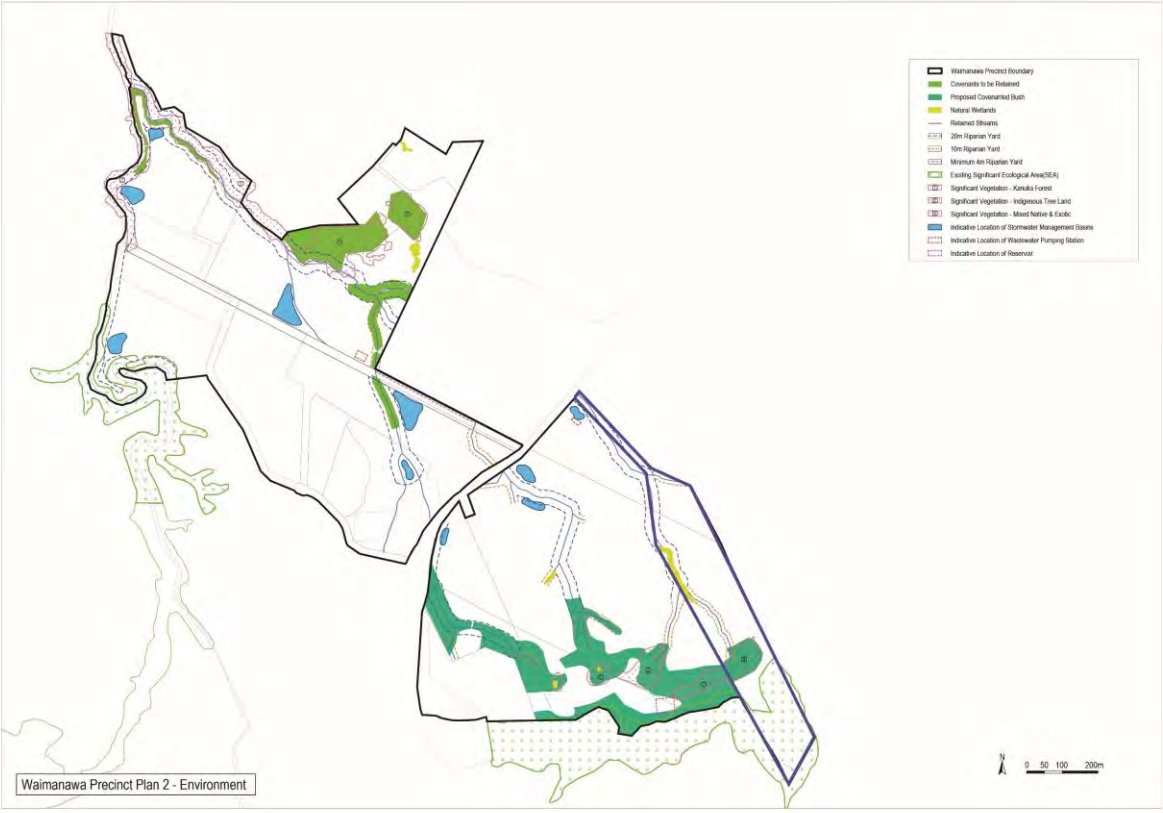


Figure 6, Warkworth South Precinct, Environmental



Figure 7, , Warkworth South Precinct, Transport



Figure 8, Warkworth South Precinct, Open Space

This plan change includes a funded programme to provide the necessary infrastructure to service the plan change area. Key infrastructure is futureproofed to service future expansion of Warkworth South.

3 FDS and Warkworth South

The FDS sets out a proposed framework for urban development of Auckland as a 'Quality Compact City'.

The FDS, as it stands, reflects not only a redefinition of the interpretation of a 'Quality Compact City', as defined in the Auckland Plan, but proposes a fundamental change of direction from the policies and commitments set out in the Auckland Plan, giving a 30-year direction for Auckland's Future Growth, and built on and developed the plan and strategy over the past 10+ years.

The fundamental intent of the Auckland Plan was the need for a plan for a longer period of growth to provide a clearer picture of future urban form and ensure the best overall balance of intensification and new greenfield development for residential and business purposes. This was a requirement of Local Government (Auckland Council) Act 2009 (S79)

The Auckland Plan was subsequently reinforced through the Auckland Unitary Plan (AUP), the Future Urban Land Supply Strategy (FULSS) the Long-term Plan and the Warkworth Structure Plan with underlying objectives to provide clarity and certainty on land supply and enabling urban development to support Auckland Growth.

The effect of the FDS is to slow down, defer or remove future greenfield development, suggesting that Auckland's growth can be successfully managed within the existing urban area, contrary to the outcomes of all previous work on Auckland's growth strategy.

This strategy stems from several assumptions which appear to be based on incomplete evidence. The FDS assumes that:

a) A prescriptive rather than balanced approach to land supply and urban and business development will meet the needs of the Auckland region and its people in the medium to long term

b) The extensive investigation and planning that has been undertaken over the past 10+ years to establish a template for quality land supply and development is no longer appropriate

c) The extensive detailed technical investigation and planning that has been undertaken on Warkworth South over the past 3 years is not valid. This has been in front of Auckland Council for some months and has consistently had general positive support

d) The Council led reset in 2012/2013 to enable effective management of land supply and development to manage growth in Auckland was flawed and is no longer relevant

e) The Rural Urban Boundary (RUB) should be reinvestigated, despite a commitment that the intention of the RUB is to be a 'defensible, permanent rural-urban interface and not subject to incremental change'

f) There is sufficient capacity for Auckland's projected population growth in the medium to long term within the existing metropolitan area through proposed Plan Change 78 (PC78), whilst putting timing delays/hold on the vast majority of future urban areas. The Council itself has sought to pause (for 1 year) the PC78 process while it completely revisits PC78 due to stormwater and natural hazard concerns following the recent weather events. The inevitable consequence of this review will be less intensification (i.e. housing) allowed for in existing residential zones. Until the outcome of this review is known it is impossible to know whether Future Urban Zone (FUZ) should be altered for urbanisation. That review must be allowed to catch up for the matter to be looked at holistically

g) The current sequencing for future urban areas through the robust and mature process UAP, structure plans and plan changes is not being managed effectively. Council cannot and should not 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 the one Council led public plan change which was subsequently withdrawn

h) The future expansion of the Rural Urban Boundary (RUB) should only be managed by the Council through a public plan change process

i) There are overwhelming natural hazard concerns, particularly flooding, which drive the abandonment of some future growth areas or at least the re-examination of greenfield areas, despite the extensive investigations and decisions on managing these concerns over the past 10+ years

j) The Council's predicament on budgetary constraints and infrastructure funding should impact the long term Strategy

k) The view that core infrastructure necessary to enable land development can only be funded through Council and other public processes; and therefore, any new greenfield developments should be deferred. Given the current financial predicament it is even more important that private and public sectors work together and achieve the combination of urban consolidation, greenfields development, and the expansion of satellite towns in the greater Auckland area. The only way to solve housing and infrastructure is through partnership with the private sector. A more agile rather than restrictive strategy is called for. New infrastructure is funded through growth and is providing on a demand basis. Infrastructure is not provided first with the assumption that development will follow

Furthermore, the FDS appears to compromise the Auckland Plan Values:

a) Kindness and Generosity; The FDS does not appear to have had the transparency requisite of a fundamental shift in urban form strategy that will directly impact the current and future population of Auckland. The submission period needs to be extended with appropriate public consultation and awareness

b) Strength in Diversity; Auckland is a diverse and complex ecosystem with a population that has a strong cultural mix with diverse and complimentary needs, that need to be treated with equity. The approach taken does not appear to be equitable and needs significant further investigation

c) Creativity and Innovation; The FDS does not appear to be allowing for the creativity and innovation that is driven by private sector as well as public sector

d) Integrity; The FDS does not appear to have taken into account significant evidence based technical reports that have been supplied regarding Warkworth and Warkworth South. It has also been identified in the AUP supporting reports that 'Public opinion is generally opposed to intensification, which indicates that Auckland Council still has some work to do with communities to demonstrate that quality growth can occur.' The proposed approach appears to limit choice and to not align with the wider community needs

e) Future Generation; Our future needs to be based on a balanced approach to support the needs and aspirations of all Aucklanders, and New Zealanders

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

3.1 Warkworth South Rezoning – How the FDS Has Got it Wrong

In terms of Warkworth South, the FDS and its supporting documentation signals 'further investigation' is required and a deferment of the rezoning of the area until 2045+ as well as a review of the classification as Future Urban Zone (FUZ). The FDS gives the reasons for this as:

1) Lack of or poor transport connections including no rapid transit network and lower opportunities for mode shift
2) 'moderate' natural hazard constraints including approximately 25% of the FUA within the 1% AEP flood plain and small to moderate areas of the FUA containing some risks of settlement, liquefaction and slope instability
3) Urban form: further consideration needed to understand the role of Warkworth as a rural node and the impact of any changes on business land capacity
4) Climate change implications of a settlement removed from the Auckland metropolitan area including potential for higher vehicle kilometres travelled (VKT) and CO_2 emissions
5) Lack of infrastructure and funding for infrastructure

These points are all fundamentally flawed and each of these are discussed in the sections below.

3.1.1 Lack of or Poor Transport Connections

The Council's background report raises issues with the transport infrastructure as it relates to Warkworth South.

The references to rapid transit network and opportunities for mode shift are of limited relevance given the role of Warkworth as sub-regional economic and employment hub with its own internal transport requirements. Meanwhile, Warkworth benefits from a recently improved transport network. This includes:

a) The Warkworth Community Transport Hub opened in September 2022
b) The Puhoi to Warkworth Motorway opened in June 2023, extending NZ State Highway 1 to Warkworth

Furthermore, planned walkways and cycleways are already being developed and will continue to be developed as Warkworth South Plan change and other initiatives are realised. These are a fundamental component of the Warkworth Structure Plan 2019.

The newly opened safer, more resilient, and reliable Puhoi to Warkworth Motorway has had significant and transformative impact on the region, including:

a) Substantially moving traffic travelling between Auckland and Northland and the Mahurangi Peninsula/Matakana area, away from old State Highway 1 through Warkworth South and the Hill Street intersection, to new high quality, high-capacity roads which effectively skirt the western and northern side of Warkworth, being largely west and north of the Warkworth urban area
b) The new road linkage is now open and fully operational and has resolved all capacity issues in the area
c) The effect of this has been to remove significant traffic volumes from the Warkworth street network. It delivers a substantial decrease in the Hill Street intersection which was the bottle neck and a key constraint on transport linkages within and through Warkworth
d) It has brought significant capacity to the old State Highway 1 between Warkworth South and the town centre and on to the entrance to the new Motorway. The detailed transport

assessment by TPC in support of the plan change clearly demonstrates that there is full capacity to move north from the Warkworth South plan change area

e) Auckland Transport and the Strategic Growth Alliance (SGA) have in June 2023 commenced notice of requirement procedures to create the necessary intersections for the Warkworth Western Link Road (WWLR). SGA made a decision not to route protect the southern transport network as they were confident this would be delivered by the private plan change that has been lodged with Council

f) Warkworth South private plan change submitters will build this intersection roundabout as it gives key access to Waimanawa Hills and Waimanawa Valley (detailed in Warkworth South plan change currently in front of Council)

g) Warkworth South private plan change submitters will also fund a walkway and cycleway connection from the WWLR through to the existing footpath and cycle connections at McKinney Road.

h) The concerns leading to deferment, or review, of Warkworth South because of transport access and infrastructure funding problems, are unfounded

i) Old State Highway 1 provides good roading access north to the township, the surrounding employment and recreational district of Warkworth/Mahurangi, and connections on State Highway 1 south to Silverdale, Albany and Auckland, and north to Whangarei and Northland.

j) The pedestrian and cycling upgrades between Warkworth South and Warkworth Central are identified through the plan change process and funded as part of the plan change implementation package

k) The roundabout identified within the notice of requirement to give access from old State Highway 1 to WWLR is identified in the plan change, identified in the NoR and funded by the submitters as part of this development.

l) Warkworth South private plan change submitters will effectively fund the WWLR through to close to the boundary of the Mahurangi River headwaters as part of development of the plan change. The WWLR will be put into strategic arterial road standards including limitations on access. This will include walkways, cycleways, a two-lane road and agreed intersection points to give access to the Waimanawa Valley development as well as connection through to Wamanawa Valley.

m) The plan change provides for the bus hub to enhance public transport when population growth warrants the service. The local centre provides terminal facilities for bus based public transport.

The assumption that Warkworth does not have the prerequisite transport connections and internal transport infrastructure is incorrect.

3.1.2 'Moderate' Natural Hazard Constraints

The FDS states that delaying development of Warkworth South is in part a response to the significant weather events and flooding and stormwater issues following the January and February storm events in Auckland.

This is an overly conservative approach to managing flood risk and is in essence a knee-jerk reaction to a perceived risk, that has not considered the extensive work on flooding and overland flow within the Warkworth South area, initially through the Warkworth Structure Plan 2019 and latterly in the extensive work done on the Warkworth South plan change.

The 'Warkworth Stormwater Management Plan', Warkworth Structure Plan 2019, identifies areas of flood hazard, The assessment gives an overview with respect to potential areas needing further investigation and any required mitigation.

It is identified that Healthy Waters considers that some further, specific consideration of stormwater requirements in relation to particular land uses and locations will be required in order to ensure that an integrated stormwater management approach is achieved throughout the structure plan area. The expectation is for the technical details to be worked through and managed as land is live zoned.

This is a robust approach and proven to be successful in removing or mitigating risks at the appropriate time. It has already been proven that greenfield development over the past 10 years has been robust with respect to hazards/flood plain risk etc (far outperforming performance in Auckland Urban area).

As part of the plan change for Warkworth South, there has been detailed modelling of the flood plains, flood prone area, and overland flow paths at different event scenarios for the entire Warkworth South plan change area. The 'Stormwater Management Plan' is currently before Auckland Council with [Revision D] having been submitted in July 2023. Items to consider:

a) This is an extensive and current report that covers flooding and overland flow within the catchment

b) All flood plains within the plan change area are to remain undeveloped for housing and will mostly remain as streams or open space. Meanwhile Warkwoth South-East has no flood zone concerns or direct mitigation requirements

c) Overland flow is successfully managed through existing streams and on roads

d) There are already robust and proven Council controls in place for managing new dwellings within a flood plain. These require consent under E36 and, to reiterate, these controls have been proven to be effective through the 2023 flood events in Auckland

While there are parts of the Warkworth South plan change area that are within flood prone areas, the development of housing and roading is <u>not</u> located within these areas. All house sites sit <u>outside the flood area</u> as identified on the plan.

The report identifies a best practise approach to stormwater and overland flow management within the plan change area. The collaborating landowners are committed to this, and the plan change provisions require it.

Overland flow is managed in streams and on roads. Flood prone areas are kept free of housing. The AUP includes all the tools (objectives, policies, standards, and assessment criteria) to ensure that in future subdivision and development, housing and business is kept clear of land subject to natural hazards including flooding.

The FDS statement that 'further investigation' is required to determine whether Warkworth South can be developed is entirely unfounded. This investigative work has been done by the developer already. Furthermore, it will be subject to thorough and robust scrutiny through the plan change submission, evidence, and hearing process before an Independent Hearing Panel.

There is no debate that land developed for housing or business needs to either avoid or successfully manage the effects of natural hazards including flooding and land stability.

The RMA and existing Auckland Unitary Plan rules that would apply to any subdivision or development consent, already has the appropriate controls in place to prevent development occurring in natural hazard areas where risk cannot be successfully mitigated.

In summary, natural hazards are already comprehensively controlled and should not require reassessment:

a) Land developed for housing or business needs to either avoid or successfully mitigate the effects of natural hazards including flooding and land stability. However, the solution is not to remove future urban zoning completely where there is "possible" hazard risk. The solution is to ensure that before a development proceeds, it has been robustly tested for vulnerability to natural hazards and can demonstrate that any identified natural hazard risks can be avoided, remedied, or mitigated.

b) The existing controls are working well. Issues that occurred in the 2023 weather events occurred in areas that had been developed a substantial time ago and in existing urban and suburban areas. Those areas developed under the current AUP controls were not impacted by the storm events.

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

There is no basis on which rezoning of Warkworth South should be deferred or reassessed because of stormwater and flood management issues.

3.1.3 Urban Form: Further Consideration Needed

The Auckland Plan identify a growth strategy for Auckland based on a balanced combination of urban consolidation, greenfields expansion, and township expansion including Warkworth.

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

There is significant economic opportunity and employment generation in the northern part of the Auckland Region. Warkworth is the major hub for the northern part of the region. It provides significant opportunity for employment and the need for associated housing, in terms of rural servicing, support services, and the tourism industry as well as Warkworth's role as a developing economic hub attracting a variety of businesses and opportunities.

'Review of dwelling and employment yields', Warkworth Structure Plan 2019, shows that employment yield has been assessed and clearly demonstrates that Warkworth is not only self-sufficient on employment opportunity vs household but shows that urban and business development and growth enables Warkworth's full yield potential. Total employment yield has been assessed and clearly shows workers per dwelling meets the AUP targets. ***Warkworth has been established as a 'sub-regional economic and employment hub' and, as such, Warkworth is not only servicing the Auckland North region but is also servicing the wider rural and urban regions.***

This is requisite on developing the appropriate business zones. Warkworth is already an employment hub including a technology hub with leading edge businesses located in Warkworth. With urban development, Warkworth capability through expanding as an employment hub will be further enabled, aligning with the AUP growth strategy.

The role of Warkworth as a sub-regional and economic employment hub is already established and should not be considered as requiring further investigation or as a reason to defer rezoning.

3.1.4 Climate Change Implications

The Warkworth Structure Plan 2019 clearly demonstrates the sustainability opportunities through the plan and alignment with policies and strategic outcomes considered of most direct relevance to an assessment of sustainability through the urban and economic growth identified in the plan. These principles are followed through and aligned with in the Warkworth South plan including:

a) Planning for sustainable outcomes

b) Opportunities for enabling compact urban form and efficient use of land and associated promotion of a self-sustaining community

c) The design of green corridors to ensure multifunctional benefits

d) Walking and cycling network and the promotion of low carbon and active transport modes

The sustainability and self-sufficiency principles are built on through the planned growth of Warkworth. 'Review of dwelling and employment yields', Warkworth Structure Plan 2019, identifies that total employment yield has been assessed and clearly demonstrates that Warkworth is not only self-sufficient on employment opportunity vs household but requires that the full FUZ be developed to enable Warkworth's full yield potential. This clearly shows workers per dwelling meets the AUP targets. **Growth will result in reduced km travelled/CO2 emissions per head, <u>not</u> increased, thereby aligning with climate change polices**.

Conclusions form the 'Sustainability Assessment', Warkworth structure Plan 2019, identify that with the planned growth Warkworth promotes a self- sustaining community and region with reduced need to travel to access employment.

Warkworth South is aligned with the wider Auckland plan for Growth and sustainability due it's unique position as a sub-regional economic and employment hub supporting the north Auckland rural and urban regions without having reliance on the Auckland metropolis.

This is demonstrated with the development of a wide range of services, professional services, medical services, groceries and trade availability within the Warkworth township.

The compact size of Warkworth and the dedicated walking and cycling links through the Warkworth South plan change, provides alternative travel modes for residents. The local centre part of the development also ensures a walkable opportunity for base services / retail.

Climate change implications and Warkworth's role in the wider requirement for reduced VKT per capita are aligned with the wider Auckland strategy. This should not be considered a reason for stalling growth, based on invalid assumption.

3.1.5 Lack of Infrastructure and Funding for Infrastructure

The Warkworth South plan change and implementation programme resolves and funds all infrastructure for the plan change area and futureproofs infrastructure for the rest of the Warkworth South area. The infrastructure supports the wider economy, communities and what makes for a well functioning super city. This infrastructure will provide significant residential and business capacity in the wider Warkworth area.

In particular, the proposal funds all local infrastructure in the normal manner as well as:

a) Upgrading old State Highway 1 through the plan change area to urban road standards

b) Building a dedicated shared path walkway and cycleway from the plan change area to McKinney Road

c) The construction of the roundabout at WWLR and two-lane strategic arterial on the WWLR

d) The potable water supply line from Warkworth to Warkworth South

e) Vesting the land for the water reservoir to service Warkworth South. Securing this land will futureproof either an extension or duplicate reservoir for the rest of Warkworth South

f) Vesting the land necessary for the wastewater pump station to service the plan change area

g) Construction of the pump station to service the plan change area

h) Construction of a rising main from the pump station to the top of McKinney Road, with the opportunity to place a second pipe in the trench to service other parts of Warkworth South if developed in the future

i) Construction of a gravity line, futureproofed for all of Warkworth South, from McKinney Road to the prime Warkworth pump station

j) Setting aside land for the transport hub identified in the SGA programme and in the Structure Plan

It should be noted that infrastructure triggers including both the WWLR and the Southern Public transport interchange are accommodated for in the Warkworth South plan change. Meanwhile the opening of the Puhoi to Warkworth Motorway has had significant and transformative impact to the roading network within the Warkworth area. The close access to the main interchange and direct access to old State Highway 1 has limited the requirement for the Southern Interchange as a key infrastructure trigger. It is agreed that future growth beyond the Warkworth South plan change would benefit from this trigger.

Other core sub regional infrastructure, which is either complete or in progress and will align with South Warkworth plan change and development timeframe:

a) Rising main from Warkworth to the Snells Beach Wastewater Treatment Plant. It should be noted that this has been sized to include the Warkworth South development, so there is sufficient capacity within the treatment plan

b) Upgrade of the treatment plant

c) Ocean outfall from the treatment plant

d) Upgrade of the water supply

e) Completion of the Puhoi to Warkworth Motorway

f) Completion of the Matakana Link Road

Warkworth and particularly Warkworth South is uniquely placed to deliver the need for growth in a project where:

a) Regional infrastructure is either in place or physically in construction

b) Warkworth South infrastructure will be funded by the developer. It will also supply service infrastructure to the wider area when this is required.

Infrastructure projects in Warkworth need to be encouraged in order to meet the wider objectives for Auckland strategy around growth and land supply.

3.2 The Impact of Proposed Reversing of Longstanding Council Commitments

The current objectives and policies for Land Supply for Urban and Business development are well established and have been built on, developed, and implemented over the past 10+ years with the purpose of giving 30-year direction with guaranteed land supply to meet the strategy.

This has been managed and built on through the Auckland Plan, AUP, FULSS and the Warkworth Structure Plan.

The Auckland Plan is a key direction-setting document for the Auckland Unitary Plan. It is a comprehensive strategy covering social, economic, environmental and goals with an overall vision of making Auckland the World's most liveable city. The Auckland Plan defines the following fundamentals:

a) 30-year direction for Auckland's Future Growth

b) 60 to 70% in Existing Urban Area, 30 to 40% in Greenfield, Satellite Towns including Warkworth

c) A land supply development strategy

d) A development strategy incorporating:

- Planning for a long period of growth to provide a clearer picture of future urban form and ensure the best overall balance of intensification and new greenfield development for residential and business purposes
- The Rural Urban Boundary intended to be a permanent rural urban interface and not subject to incremental change, providing for 30 years of urban development
- Integrated planning for the staging and delivery of serviced land inside the RUB in a way that achieves **efficiency for infrastructure roll out and a reasonable degree of certainty for land owners and developers**

The Auckland Unitary Plan Objectives are clear and indisputable and specify the relevance, usefulness, achievability, and reasonableness of those objectives. Key points being:

a) Provide a more flexible and balanced approach to growth management

b) Provides for urban growth to occur in an orderly, timely and planned manner in areas zoned future urban within the RUB. This means that new infrastructure, such as water and wastewater infrastructure networks, can be planned and used more efficiently in support of land supply

c) It will allow greater certainty about where and when urban development is to occur

d) Structure planning is an important tool to help support this approach and enable successful development to occur 'on the ground'

e) Structure plan requirements for future urban zoned greenfield land within the RUB

f) The approach outlined in the Unitary Plan provides **greater certainty for developers and landowners in both urban and rural areas**.

Future Urban Zoning Enables rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all of the following:

a) Support a quality compact urban form

b) Provide for a range of housing types and employment choices for the area

c) Integrate with the provision of infrastructure

d) Follow the structure plan guidelines

As defined in the Auckland land supply and development strategy, Warkworth and specifically the Warkworth South plan meets all the intentions, objectives and criteria outlined, for effectively and efficiently managing Auckland Growth.

Significant investment has been made by multiple landowners, including the submitter, based on a consistent, repeated, reinforced Council growth strategy reflected in these documents.

The Warkworth Structure Plan and resulting Warkworth South Plan and planning has been fully based on and compliant to these guiding principles resulting in **a comprehensive plan change** being submitted to Council in early 2023. This has followed detailed investigation and reporting and engagement with Councils and public agencies over a significant period of time.

The departure from a long-standing Council policy severely undermines confidence in all of the Council's long term strategy and planning documents. Aucklanders, including business owners, developers, landowners and not for profits cannot be sure which of the strategies are here to stay and should be followed, and which are temporary (despite stating they are long term). This has significant implications for the future development of Auckland, which relies on private developers to meet the housing wider needs of Auckland and Aucklanders.

In the case of Warkworth South, the FDS either reverses or substantially defers that long standing Council commitment. This is done notwithstanding the Council:

a) Has seen such urgency in serving a notice of requirement for both:
    - Warkworth Wider Western Link – North Auckland Transport, NoR 8
    - Warkworth State Highway 1 – South Upgrade Auckland Transport, NoR 3
b) Has landowners who have clearly indicated their desire to enter an infrastructure funding agreement such as they will fund all necessary infrastructure for Warkworth South plan change area.

Not only has the Council promoted this FDS without considering this plan change request and the infrastructure proposals embodied with it; it has done this without any consultation with the submitters. Given this plan change request has been lodged with the Council for a number of months it is incumbent on the Council to directly consult with the applicants prior to this policy change.

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

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

4 Wider Implications of FDS and General Submission

4.1 General Comments on the FDS

The NPS-UD requires the Council to prepare an FDS that provides sufficient development capacity over the next 30 years to meet expected demand. This is to provide for both residential growth and business growth.

Since 2011 this has been achieved though promoting a balanced growth strategy for Auckland based on clear and substantiated objectives for targeting both residential growth and employment/business land supply through urban development within the metropolitan area, targeted greenfields expansion, and growth of Townships including Warkworth within the RUB through plan changes based on the established structure planning processes.

This has been consistently reinforced through the Auckland Plan, Auckland Unitary Plan, FULSS, and Structure Plans including the Warkworth Structure Plan.

The private sector, through private plan changes, has funded and provided for these developments. A number of these areas have been successfully developed following private plan changes. None of these areas have exhibited any geotechnical or flooding issues through the recent extreme weather events. The current policies, provisions and required assessments are effectively managing environmental risk. Greenfield developments, which are carefully master-planned, and coordinated with Council input will perform exceptionally well to climate change and natural hazards. Good development done well should not be discouraged or mandated against.

The primary concern with the FDS is that this is being rushed through without appropriate thoroughness. The impact of what is being proposed in the FDS is fundamental to Auckland's Urban Form and Growth Strategy and should not be rushed through.

If the FDS is pursued in its current form, then it will trigger the unintended consequences, including:

a) Further constraining residential and employment land supply.

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

c) Significantly and negatively impacting housing affordability through land supply constraint.

   - Directly impacts housing affordability by raising land value expectation and ultimately housing cost
   - Through a healthy and balanced over zoning these distortions will not occur
   - The unintended consequence of the FDS will be land supply constraint
   - This is contradictory to the direction from central government through the NPS-UD and providing sufficient capacity to improve housing affordability

d) Having a demonstrable negative impact on the economic development of Auckland and the development sector

e) An overall negative impact on Aucklanders' opportunities and welfare

f) Direct impact on Warkworth liveability and opportunities

It is accepted that the Council has financial constraints which are negatively impacting infrastructure provision. However, the solution is not to try and stop greenfields development which are being enabled by Private Plan Changes. If the problem is funding infrastructure, then the solution is to use alternative ways to fund infrastructure such as developer funding and the use of the Infrastructure Financing and Funding Act 2020.

From a coordination perspective this is already being managed through the current processes outlined in the AUP through Structure Planning and appropriate coordination with Council for infrastructure and live-zoning.

In terms of capacity assumptions, the FDS is based on theoretical and unrealistic scenarios for growth potential within the existing urban area. This is assessed using 'plan-enabled' and 'feasible' capacity but fails to assess whether this capacity is reasonably expected to be realised (3.25(c) of the NPS-UD). This is a fundamental oversight and undermines the FDS's capacity assumptions. While theoretical models can be created to imply a decade's worth of growth within the existing urban area, the reality is that this is not available, and history has proven that this level of growth has not occurred. The asserted development potential to a large extent (but accepting proposed PC78 may free up more development) has been in place for the last ten years. Urban consolidation is a significant contributor to Auckland's growth. However, it is not the complete answer.

The strategy does not produce enough housing or the required balance to meet the needs of the Auckland and wider population:

a) The FDS is based on assumptions that there will be a large uplift in capacity in urban areas from PC 78. However, PC78 has been paused to allow time for Council to complete flooding and natural hazard assessments. These assessments will inevitably lead to a reduction in capacity provided for through PC78 in the existing urban area. As a result, there will be implications for the capacity required in greenfield areas to meet forecasted demand. When PC78 implies an approximately 2.345 million dwellings as a theoretical potential, it is based on unreasonable assumptions.

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

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

    - The FDS identifies budget constraints and indicates an inability to solve infrastructure. The solution appears to be to slow down or stop growth until the financial position allows for the next phase of infrastructure funding
    - The fundamental issue of Auckland's growth and need for employment land housing land does not appear to being considered
    - The FDS should focus on continuing to work with the private sector to solve infrastructure problems
    - Central management, by constraining balanced land supply and growth distorts the market and results in uncertainty and unintended consequences including policy changes that contradict the fundamental Auckland Plan of giving long term certainty through a balanced and pragmatic approach
    - Rather than taking a broad sweep approach to greenfields and satellite towns land supply, the focus should be in supporting land supply on a case by case basis through making use of a variety of ways of funding infrastructure and enabling growth rather than constraining growth. There are options available which should be supported, such as private sector funding, PPP models, infrastructure funding agreements around managing the development contribution model etc
    - The FDS appears to assume none of these are applicable or workable. Energy should be put into identifying innovative proposals for targeted growth areas

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

e) The FDS relies heavily on urban consolidation which in turn relies on PC78 but:

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

The FDS has been prepared in isolation without adequate consultation with the development community, mana whenua, infrastructure delivery partners and funding providers. What this shows is that:

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

b) This has been embraced by the community including the development community

c) Very substantial investment decisions have been made based on this Council commitment

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

e) This has delivered additional growth for Auckland

f) None of the developed private plan change areas experienced any issues with flooding events or geotechnical problems. The system worked and is working. In contrast, there has been widespread flooding throughout urban areas caused by insufficient infrastructure

g) The private sector community has funded the necessary infrastructure to service these greenfield areas. It is recognised that the Council does face future funding constraints, this can be addressed through private sector collaboration

4.2 The Auckland Future Development Strategy (FDS)

a) The submitters accept that a FDS is required under the NPS-UD but do not support the Council's proposed draft and consider that it is based on an inadequate and insufficient evidence base

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

c) The FULSS has worked reasonably well in informing and directing the location of growth, albeit that the strategy has not been responsive enough to the pace of growth and Council has not had the resources to fully implement it. 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 the one Council led public plan change that was subsequently withdrawn.

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

5 Submitters Requested Decision

The submitters request:

a) The Council pause the current programme on the FDS to allow for thorough and objective review of the strategy
b) That Warkworth is identified as a Regional Economic and Employment Hub with associated growth strategy
c) That any new iteration of the FDS include the Warkworth South area including Warkworth South-East as a committed growth area
d) That Warkworth South area including Warkworth South-East be shown as development ready in the 2023-2030 time period.
    - It is recognised the Council may want to record that the live zoning is dependent on an infrastructure funding agreement between landowners and the Council over key infrastructure funding
    - The plan can record that as part of any rezoning, appropriate management of flood plain and overland flow will be required to ensure development sites are not within flood plains
e) Ensure there is sufficient release of employment and residential land to cater for growth
f) Enable 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 aspire to
g) That the consultation period for the FDS be extended to 12 months with an opportunity for hearings.
h) Key principles be agreed including:
    - Sufficient land must be released at the appropriate time to cater for growth
    - The continuation of a balanced approach for growth with the combination of urban consolidation, greenfields development, and the expansion of satellite townships
    - Growth needs to be serviced by adequate infrastructure
    - Infrastructure can be supplied through a broad range of options including innovative methods and participation by the private sector (investment and development)
    - Stormwater and flood plain management are important factors and need to be considered in the release of land whilst recognising appropriate methods to manage such land
    - Apply those principles on an area by area basis to identify the release of land

6 FDS Impact Response

As private landowners, New Zealanders and Warkworth residents the FDS has already had a direct and significant negative impact on our livelihoods.

We moved from Waiwera/Puhoi area to Warkworth for the following reasons:

a) To live and work in a growing town with all the facilities to support our businesses and lifestyles

b) To invest in growing town transitioning from a tourist and rural hub to a sub-regional economic and employment hub

c) To become part of the Warkworth community

d) To live and work in Warkworth through to retirement with assurance that Warkworth had the facilities to support us

e) To have certainty that Wirksworth's growth would allow us to have a return on our investment to allow for a private pension to support us in retirement

To purchase land in Warkworth we invested significant savings as land value had increased due to Warkworth's location and its position in the Auckland Unitary Plan and the associated Warkworth Structure Plan.

We purchased based on:

a) AUP delivering clarity and certainty for Landowners in the Warkworth area:
    - The RUB being clearly identified as defensible and permanent
    - Greater certainty for Developers and Landowners in both Urban and Rural areas

b) AUP Identifying Warkworth as a Growth Hub in 2013 and validating this through to 2023, based on updates and revisions of the AUP and the Warkworth Structure Plan supporting the strategy and giving required certainty to landowners

c) The Warkworth Structure Plan giving a clear 20 year timeline for land use in the Warkworth Future Urban zone

d) Professional Valuation through ASB bank, who based the valuation on the clear and well established growth strategy identified in the Warkworth Structure plan and reinforced by Council

The investment in the land has been validated by:

a) Investment in the adjacent land by a significant NZ Development company with the backing of the NZ Super Fund, with the Government as a Capital Contributor

b) Risk Management Policy identifying the area as targeted for growth and associated investment

c) Direct investment by other property developers in the Warkworth Future Urban Zone

d) Key infrastructure and service projects going live over the period of the Warkworth Structure Plan timeframes

FDS Impact:

a) AUP and the Warkworth Structure Plan directly drove land value over the past decade through perceived certainty on land supply and land development planning

b) FDS has removed certainty and has further introduced uncertainty for the long term through proposing that the current FUZ be designated ‘under investigation’ for the foreseeable future

c) FDS has devalued property immeasurably through the direct consequence of undermining 10+ years of planning and investigation

d) Significant money has been spent by the submitters on technical assessment reports and planning documentation in accordance with AUP and the Warkworth Structure plan processes and policies

This has resulted in direct personal and financial impact:

a) Introduces financial uncertainty for the foreseeable future due to the newly introduced ‘under investigation’ zoning

b) Results in devaluing property by 50 to 65% on cost paid

c) Potentially introduces significant negative equity that cannot be recouped

d) Removes choice through introducing market uncertainty

e) Reduces the appeal of Warkworth as a desirable place to live and work

The direct impact is significant financial insecurity and ongoing future uncertainty.

Future Development Plan 2023 #8573

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?

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 #8574

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 provided for urban consolida on and greenfield development to contribute to housing supply, affordability and choice.
Given the existing infrastructure and community facilities it is an efficient and compact outcome to retain the Warkworth South-East as Future Urban to be developed in 2028 - 2032. This will provide the required degree of certainty and facilitate opportunities for land development to deliver land for employment and housing as required to respond to growth demands in Warkworth.

Accessible local centres

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

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

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

Tell us why

As set out above the land is in close proximity to infrastructure, a local centre, the Town Centre, schools and other education facilities and employment options.

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.
In any event, as addressed above, the existing policy and legal framework, requires 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?

To summarise, the approach to development as outlined in the FDS will not achieve the purpose of the FDS, nor is the approach based on sound, 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.

Ash Hames seeks that the FDS retains Warkworth South-East as Future Urban and does not delay the timing for urbanisation of this area.

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 broad 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: [redacted]

[redacted]

[redacted]

[redacted]

Property Details

The submitter owns the land at [redacted] and has an area of approximately 4.2591 hectares. The land is currently used for small scale farming activities. Access to the land, which contains a dwelling and associated accessory buildings, is obtained over a metalled pan handle access from State Highway 1. An aerial image of the land is provided in Figure 1 below.



Figure 1 – Map showing location of [redacted] Warkworth (Auckland Council GeoMaps, 21/07/23)

The land is largely zoned Future Urban Zone in the Auckland Unitary Plan (Operative in Part) ("AUP-OP") aside from a small portion on the southern edge of the site which is zoned Rural Production. A snippet of the AUP-OP maps is provided in Figure 2 below.

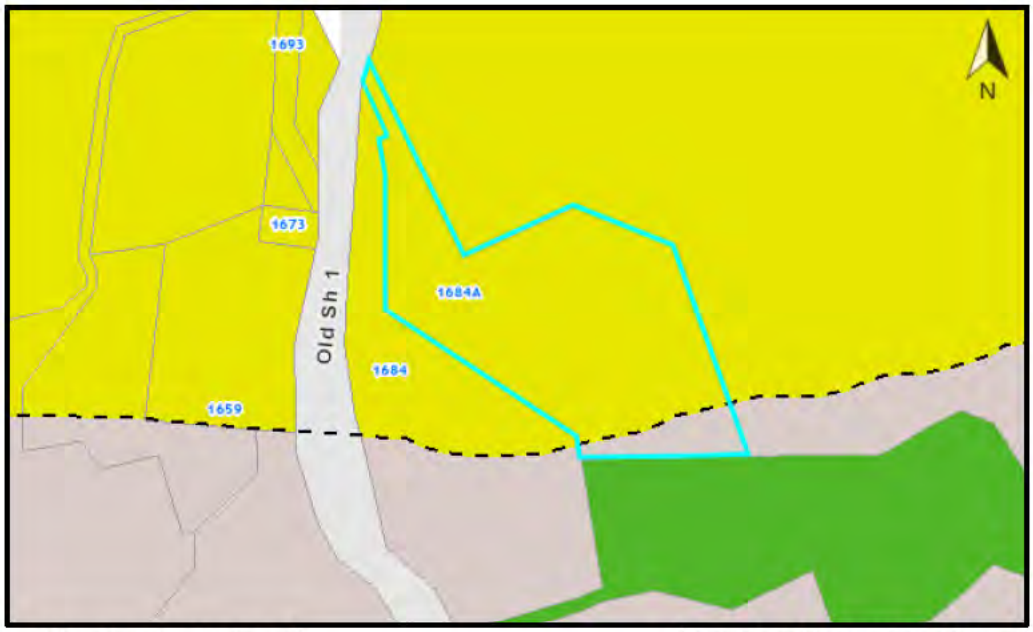


Figure 2 – Map showing zoning of [redacted] (Auckland Unitary Plan Maps, 21/07/23)

The land is identified within the Auckland Council Future Urban Land Supply Strategy 2017 (**"FULSS"**) as being scheduled to be *'development ready'* between 2028- 2032.[1]

[1] Refer to Table 1 of Auckland Council Future Urban Land Supply Strategy 2017. The site is contained within the Warkworth South Future Urban area.

The Warkworth Structure Plan June 2019 (**"WSP"**) shows the land as being within the southern fringe of Warkworth and forming part of a proposed Residential - Large Lot Zone and the southern balance of the site being identified as an area for further landscape protection controls. See Figure 3 below for a snippet of the WSP.

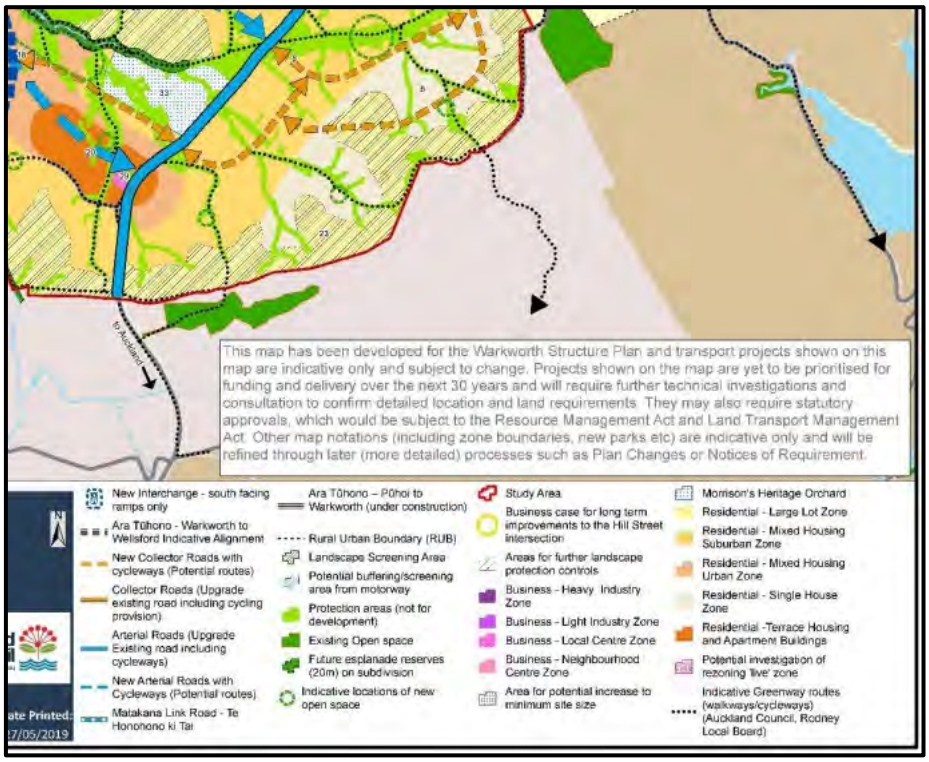


Figure 3 - Snippet of Warkworth Structure Plan

Broad 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.

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 the draft using the Special Consultative Procedure in s83 of the Local Government Act 2002, or when undertaking a review of the FDS the local authority must engage with the development sector to identify significant future development opportunities and infrastructure requirements. The requirements for a review of the FDS, Clause 3.16 (2) requires that the review must also include engagement with 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.[2]

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 identifies the land as being contained within the Warkworth South-East future urban area. The FDS shows the urbanisation of Warkworth South-East as being delayed to 2050+ and recommends that the land be subject to further investigation. Appendix 7 of the FDS recommends removal of Warkworth South-East future urban area for the following reasons:

- Infrastructure: Transport infrastructure is not planned to support development before 2040+. There is no rapid transit network planned so this area would not contribute to VKT reduction. Distance from the existing urban area, lack of rapid transit and lower opportunities for mode shift mean strategic outcomes are unlikely to be achieved.

- Urban form: Further consideration is needed to understand the role of Warkworth as a rural node and impact any changes might have on its sub-regional function. Business land provision is crucial to how Warkworth will develop. Further assessment is needed to understand the impact any changes might have on business land capacity.

- Emissions/VKT reduction: Potential for higher vehicle kilometres travelled (VKT) and CO2 emissions than other FUAs due to Warkworth being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs.

- Natural hazards: Warkworth South has moderate hazard constraints, including approximately 25% of the FUA within the 1% AEP flood plain, and small to moderate areas of the FUA containing some risks of settlement, liquefaction and slope instability.

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

This submission demonstrates that these reasons are completely incorrect for the following reasons:

Infrastructure:

- The land presently has access to State Highway 1 in order to access the nearby Town Centre, education facilities and employment areas.

- Supporting Growth have recently lodged Notice of Requirements on behalf of Auckland Transport and Waka Kotahi to protect the future transport network for Warkworth. Parts of the required network in the southern area of Warkworth do not form part of the Notices of Requirements as there was comfort that these transport corridors would be provided by the Waimanawa – Warkworth South Plan Change that has recently been lodged with Auckland Council.

- The Snells Beach Wastewater plant has been designed to service all future urban land in Warkworth so there is wastewater infrastructure in place.

- 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 greenfields 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.

Urban form:

- The land has direct access to State Highway and is located within the Warkworth South Private Plan Change Area (**"PPC"**). The PPC was recently lodged with Auckland Council by KA Waimanawa LP and Stepping Towards Far Limited recently lodged the PPC with Auckland Council. The PPC seeks to rezone the Future Urban land in Warkworth South in accordance with the WSP. The PPC shows the land being located within proximity to a future local centre, future open space areas, arterial roads and pedestrian linkages.

Emissions/VKT:

- For the reasons stated above this area is suitable for development. It will provide employment opportunities and housing supply. There is also reasonably direct access to the town centre.

- The land has reasonably direct access to the town centre and nearby employment options via State Highway 1. The land is located close to education establishments including early childhood learning centres, Mahurangi College and the tertiary opportunities provided through Manukau Institute of Technology campus facilities in Woodcocks Road.

Natural hazards:

- The area not constrained by environmental hazards – there is no significant natural hazard risk.

- Greenfields development often responds better, and the response is more efficient, in terms of managing potential hazards such as flooding.

- Greenfield developments, which are carefully master-planned, can equally respond to climate change and hazards. Good development done well does not lead to flooding and natural hazard risk.
- The existing policy and legal framework require hazard risk to be fully assessed through any proposed plan change process.

In addition to the above, the submitter considers that the following arguments made by Auckland Council in the FDS are fundamentally flawed:

- The FDS seeks to limit the use of private plan changes as a mechanism for rezoning Future Urban areas on the basis that the private plan changes have severely undermined the sequenced approach provided for through the FULSS. Section 4.2.2(1) of the FDS outlines that:

  > *Future urban areas have come under increasing development pressure. Rather than the sequenced approach provided for through the FULSS, live zoning has come through private plan changes ahead of time. Up until the end of March 2023 10 private plan changes were fully operative in the future urban area. A number of other private plan changes are being processed with more expected. In effect, private plan changes are driving the strategy. This has removed any degree of certainty in sequencing and timing of growth and has forced the council group to become more reactive to ever changing priorities – both in the timing of development and the number and spread of areas being live zoned.*

  Private plan changes are fundamental to achieving the development of greenfield land. The FDS states that approximately 33% of the identified future urban land has now been live zoned and is being developed (as at the end of March 2023) - this has been solely achieved through private plan changes, noting that the only plan change initiated by Auckland Council - Plan Change 5: Whenuapai Plan Change was withdrawn.

- It is vital to obtain input from the private sector - such as developers and landowners to formulate a growth outcome that is cost-efficient to Council and delivers quality urban outcomes. The FDS in its current form does not achieve this.

- The FDS relies on redeveloping brownfield areas to deliver a majority of the housing and business capacity on the basis that this is the most cost-effective from an infrastructure perspective. This is incorrect and indicates that greenfield land is less costly to development and can be more effective in terms of new provision for infrastructure that is more responsive to natural hazards and climate change, provides for a well-functioning urban environment and delivers choices for where and how people live and work.

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

Given the existing infrastructure and community facilities it is an efficient and compact outcome to retain the Warkworth South-East as Future Urban to be developed in 2028 - 2032. This will provide the required degree of certainty and facilitate opportunities for land development to deliver land for employment and housing as required to respond to growth demands in Warkworth.

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?

As set out above the land is in close proximity to infrastructure, a local centre, the Town Centre, schools and other education facilities and employment options.

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.

In any event, as addressed above, the existing policy and legal framework, requires hazard risk to be fully assessed through any proposed plan change process.

Resilient Infrastructure:

Resilient infrastructure

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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

To summarise, the approach to development as outlined in the FDS will not achieve the purpose of the FDS, nor is the approach based on sound, 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.

Ash Hames seeks that the FDS retains Warkworth South-East as Future Urban and does not delay the timing for urbanisation of this area.

Ash Hames wishes to be heard in support of their submission and request hearings be held to facilitate this outcome.



End of Report

Future Development Plan 2023 #8575

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Your feedback

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

Tell us why

Please see attached submission

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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?

Please see attached submission

Auckland Council
Attention: Future Development Strategy
Freepost Authority 190153
Private Bag 92300, Victoria Street West
Auckland,1142

[redacted]

[redacted] Address for Service

Terra Nova Planning Ltd
[redacted]
tnp@tnp.co.nz
[redacted]

Important privacy information

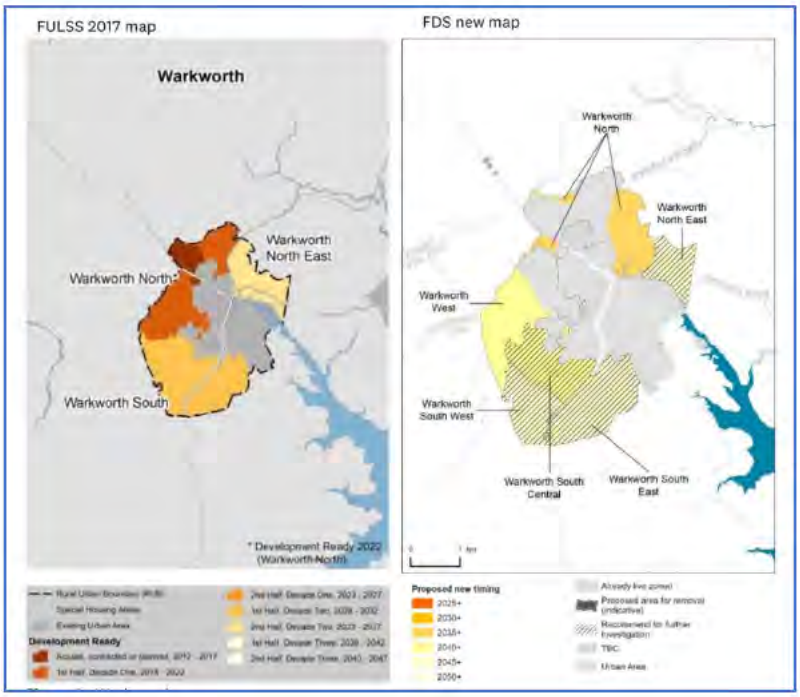
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Your Local Board: Rodney

This submission is for Janet Stevenson, the owner of a site at [redacted] who has given Terra Nova Planning Ltd the authority to lodge the submission on her behalf.

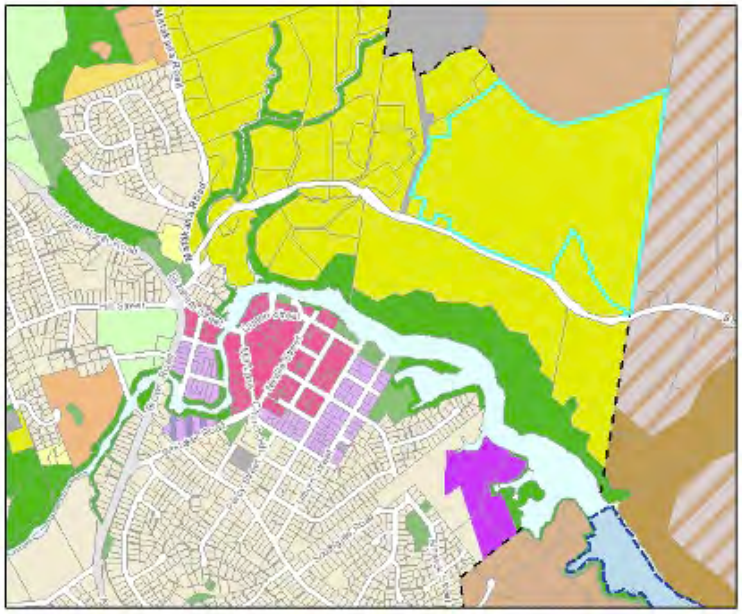
The site is zoned Future Urban in the Auckland Unitary Plan (AUP) and is 42.8ha in area.

The future development strategy proposes the site and other sites in the facility as "Recommended for further investigation".



Your feedback

This submission relates to both general statements in the draft development strategy, Warkworth, and my site specifically (shown outlined in blue below). The submission responds to the specific matters invited for comment and the summary of principles, way forward and future urban areas set out in the draft strategy.



Focusing growth

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

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

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

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

- Agree with the objective to an extent, given the advantages in appropriate intensification of existing urban areas.
- However, there are significant issues to be resolved in further adding to the level of intensification already provided for within the AUP, particularly regarding the ability of services and transport infrastructure to support significant additional intensification as opposed to well-planned and located greenfield development.
- Oppose the identification of the Stevenson land and other land in the immediate vicinity currently zoned FUZ as requiring further investigation.

Tell us why.

- The concentration of much of Auckland's current and future population within existing urban areas is sensible from an overall sustainability approach, particularly in regard to the provision of transport and utility infrastructure. However, it is noted that reference to emissions, while currently of some relevance, is almost certainly going to be of much less relevance as alternative cleaner energy sources for both private and public transport evolve.

- Disagree with the further investigation recommendation for both my site and many other parts of Warkworth as there is no sound basis for it.

- The character and location of the Stevenson site is entirely consistent with the overall objective of focused growth, accessibility to town centres, and public transport options.

- The draft strategy states that[1]:

> *Infrastructure*
>
> Transport infrastructure is not planned to support development in Warkworth North before 2035+, Warkworth West and South Central before 2040+ and Warkworth South Central, South East and North East before 2045+. There is no rapid transit network planned so this area would not contribute to vehicle kilometres travelled (VKT) reduction. Distance from the existing urban area, lack of rapid transit and lower opportunities for mode shift mean strategic outcomes are unlikely to be achieved. Wastewater infrastructure upgrades such as a new pipeline, pump station, wastewater treatment plant, outfall pipe and ancillary works are also required to support future growth.
>
> *Natural hazards and natural environment*
>
> Warkworth North East FUA has moderate hazard constraints, including approximately 8% of the FUA within the 1% AEP floodplain, and a small section at the southern end of the FUA bordering the Mahurangi River that is at risk of coastal inundation. The whole FUA is in an area of moderate-risk slope instability.
>
> Watercourses in the area tend to be of high natural and ecological value. To the south of the North East FUA, the Mahurangi River is scheduled as a "Natural Stream Management Area" and is bordered on its northern edge by a mixture of kauri, podocarp broadleaf forest and kahikatea forest which are also scheduled as Significant Ecological Areas (SEAs). These SEAs run along the southern border of the FUA and also extend north into the FUA along two of the tributaries of the Mahurangi River. There are also patches of the same forest types (although not scheduled) extending further along the westernmost tributary.

In this respect, Warkworth is an existing urban area, with transport and utility infrastructure that is either existing or under construction and capable of accommodating significant future urban growth for an additional 20,000+ people as currently planned and provided for by the Auckland Plan and the AUP, with zoning to reflect that.

This includes:

- The current upgrading of the **wastewater network and treatment facilities** involving Warkworth and Snells Beach is well advanced and scheduled to be completed by 2025, if not earlier.

- The **water supply system** including its source and network has similarly been designed and constructed to cater for the projected future population.

- The **Puhoi to Warkworth motorway** is open, and there is a new **Park-and-ride transport centre** to the south of the motorway on the old State Highway opposite Hudson Road. The Warkworth centre is 6 minutes by car and 9 minutes by bike respectively from the Stevenson site, and 30 minutes by bus to the Hibiscus Coast Station and Park-and-ride.

[1] Page 25, Auckland Future Development Strategy 2023-2053. Future urban areas evidence report – for consultation

- Land for employment, retail and commercial services, and education facilities has been identified and zoned for the projected future population. Much of this land has been already developed, is under development or consented.

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 in principle; however, the proposed strategy is at odds with the Stevenson land and other land that has been recommended for investigation.

Tell us why.

- It is sensible to recognise the importance of existing and future local centres for the reasons set out.

- In respect to Warkworth, there is an existing central town centre that is easily accessible for residents using both private and public transport. Public transport serves the town centre, and the provision of parking opportunities for vehicles within the town centre and then the surrounding streets is assisted by the historical grid pattern.

- The character of the street system also enables relatively safe movement by both pedestrians, ability scooters and cyclists, particularly cyclists with E bikes.

- The adopted Warkworth Structure Plan also provides for the future development and extension of cycle/pedestrian links between the town centre and surrounding residential areas.

- The developed and planned commercial nodes in other parts of Warkworth are equally as accessible to the same transportation forms. This has been assisted by the recent opening of the **Puhoi to Warkworth motorway, and the Matakana Link Road (MLR)**.

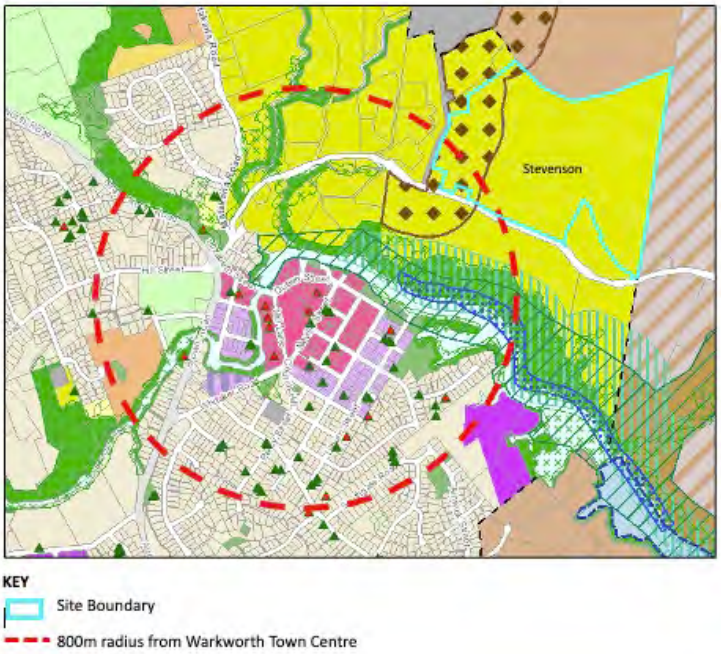
  - The first has removed significant through traffic which allows for slower and safer transport and movement throughout the town.

  - The second has had a similar effect, while also incorporating multi-transport options. Provision of vehicle, cycle and pedestrian lanes, including connections to the significant light industrial and commercial employment and service activities to the north.

- The planned extension (subject to a current notice of requirement) of the MLR to Sandspit Road is adjacent to the Stevenson site, and includes multiple transport modal options, being directly accessible to the Warkworth - Puhoi motorway, as well as the balance of Warkworth.

- The Stevenson site and other FUZ sites are also close to the Warkworth town centre which is accessible by vehicles, pedestrian and cycling, which was one of the reasons a future urban zone was proposed and accepted by the IHP.

- It is noted that 800m (i.e. a 10m walk time) is the walkable catchment measure adopted by the Auckland Council in Proposed Plan Change 78 Intensification[2]. This is illustrated below.



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 in principle but consider the proposed approach lacks refinement given the fact that much land in Auckland will be subject to some degree of flooding, sea level rise, erosion and slips in extreme events, and the proportion of sites so affected will vary. Often such effects can be avoided or mitigated with engineering design at development stage.

- Oppose the recommendation as it applies to the Stevenson site and the other land in proximity being recommended 'for investigation'. This land already been investigated by the IHP and Council and found appropriate for urban development.

Tell us why.

- The Riley Consultants engineering analysis[3] submitted to the IHP in support of the Stevenson submission to the Auckland Unitary Plan submission process confirmed that the land is suitable for urban development.

[2] https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/PC%2078%20Information%20Sheet%201%20Walkable%20Catchments.pdf

[3] 150951-A Warkworth RUB Extension Engineering Assessment.pdf

- The site has relatively limited areas constrained in terms of land subject to flooding associated with the three main streams within the site (comprising under 10% of the total 43.2ha site). This is not significant and is typical of much land in Auckland and Northland given contour and high rainfall.

- The Engineering report concluded that future detailed flood modelling, in conjunction with an assessment of earthworks and stormwater management measures, should show suitable development areas can be achieved without further effecting adjacent property or downstream infrastructure. Flood levels will be controlled within the lower reaches of the catchment by the downstream culvert arrangement and consideration will need to be given to maintaining secondary overland flowpaths to cater for higher intensity rainfall events.

- The urban development of the Stevenson land with the appropriate stormwater management and control was also concluded to have an overall benefit to the quality of water entering the Mahurangi River.

- The Engineering report further concluded that there were no significant natural hazard or geotechnical issues.

- The Auckland Council Independent Hearing Panel who confirmed the Future Urban Zoning for this and other parts of Warkworth included the following statement in its recommendation to Council[4]:

2.4.1. Extensions at Warkworth

This extension includes land to the west, east and south of the existing urban area in order to provide for the continuation of the growth occurring at Warkworth and that expected from the improved link to the city from the approved State Highway 1 realignment from Puhoi through to Warkworth. That realignment will serve to reinforce the extent of the Rural Urban Boundary by providing a defined western and north-western edge defined by the resultant roading pattern.

The land areas forming the extension are readily developable, provide for substantial growth to meet demand and also provide options at Warkworth regarding where that growth can occur. The areas are contiguous with the existing urban development, thereby supporting the development of a compact urban form, and can be provided with the required infrastructure to support significant extensions to the settlement of Warkworth.

The extensions avoid areas identified as having significant values, those including Māori, natural character and landscape values along with areas affected by natural hazards.

There were submissions seeking additional land to be included within the Rural Urban Boundary but the Panel is of the view that the reasonably foreseeable future needs for urban growth at Warkworth are provided for in the extended areas.

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.

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[4] Page 12 IHP Report to AC- RUB rezoning and precincts 2016-07-22 https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/history-unitary-plan/ihp-designations-reports-recommendations/Documents/ihp016017080081changestorubrezoningprecincts.pdf

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 with the approach in general terms.

Tell us why

- In some cases, alternative methods may achieve better overall environmental and engineering performance results and may enable development of otherwise appropriate land.
- This is often easier and more cost effective to achieve in greenfield situations than through intensification existing areas, particularly where those areas are already highly developed and intensified, often with restricted opportunities for upgrading and lack of open space areas to assist in applying nature-based infrastructure solutions.
- In respect of the Stevenson property and other sites in the facility with a FUZ, such nature-based infrastructure can be appropriate, given the characteristics of the landholdings and the ability to implement such measures in a greenfield situation.

Other feedback

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

- Further comments below relate to the principles, way forward and future urban areas.

Principles for a quality compact approach to growth and change

Support greenhouse gas emission reduction – a compact urban form (greater density, mixed-use, limited urban expansion) reduces car dependency and vehicle kilometres travel by enabling people to live and work locally and choose walking and cycling. It is a critical requirement for low carbon and climate resilient development.

- Agree with this principle. Furthermore, the inclusion of Warkworth as a growth node and the Stevenson and other properties in the vicinity with a FUZ are appropriate and consistent with it.
- While the key focus of growth and intensification is appropriate for Auckland's key urban notes, the linear multi-nodal growth model that includes nodes such as Warkworth and Pukekohe, and other nodes along the main transport route to them, is the most effective and efficient way of proceeding.
- A key factor in the success of this is to have **dedicated** bus (and rail routes), which have already been established and are being rolled out.
- With the use and development of more sustainable transport such as buses and trains and ferries, and non-fossil fuel powered private vehicles, the key routes north and south and to the north-west provide and excellent structure for multimodal development (sometimes described as "pearls on a string").
- Even with alternative fuel private vehicles, it is still important to reduce the number of private vehicle trips in terms of overall road congestion and safety goals, but with the provision of dedicated bus and rail routes and other tools, such as pricing, that objective can also be

achieved, but without confusing the objectives and unnecessarily altering the growth pattern. This is particularly important in regard to some of the other matters addressed below.

Adapt to the impacts of climate change – as our climate changes, the frequency and severity of hazards will worsen. Where and how we plan for growth and adapt to these hazards is increasingly important. We will avoid further growth in areas exposed to significant hazards, integrate nature-based infrastructure and develop adaptation responses in areas at higher risk of natural hazards.

- This has been addressed above, noting that appropriate greenfield development can in many instances better apply nature-based infrastructure.
- While further intensification around the main nodes is important (and that is already generally provided for in the AUP - although modifications may well be appropriate), there are also downsides to over intensification in terms of addressing climate change.
- For example, the provision of more extensive open space green areas and treescape within the main urban nodes to both help in absorbing stormwater and flooding, as well as providing cooling and shade for residents and workers in these areas.
- These factors should be key principles for climate change resilience, and the consequential outcome of this approach is to maintain the multi-modal development form currently being pursued and implicit in the AUP.

Make efficient and equitable infrastructure investments – infrastructure is expensive and takes significant time to plan and implement. We will take a regional view to infrastructure investment, make the best use of existing infrastructure and make investment decisions that deliver on multiple outcomes.

- Support this approach and consider that in many instances it is already been pursued.
- Significant and expensive and long-term upgrades to urban infrastructure within some of the existing urban nodes where it is proposed to further intensify will be required.
- Conversely, Warkworth has infrastructure either already upgraded or well advanced and is designed for insufficient to serve the projected longer-term population.
- This has been easier to achieve given the relatively less developed and lower density urban area.

Protect and restore the natural environment – the ecological health of the natural environment is critical to the success of urban spaces in Tāmaki Makaurau. Partnering with mana whenua and drawing from mātauranga Māori will enable greater outcomes. We will integrate, protect and restore the natural and built environment.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

Enable sufficient capacity for growth in the right place at the right time – most growth will occur within existing urban areas. The council must make choices about how it allocates limited funding across Tāmaki Makaurau. We will prioritise areas that deliver the greatest benefits, across multiple outcomes, for growth and investment. The Future Development Strategy provides for sufficient housing and business capacity over the next 30 years.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

Way forward

Strengthen nodes (the city centre, Albany, Westgate, and Manukau) – they play an important role in providing greater sub-regional sustainability. Significant and on-going investments and funding prioritisation are needed, though not necessarily in all nodes at the same time.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.

Greater focus on neighbourhood sustainability – focused around strong centres, our neighbourhoods need to become more mixed-use and accessible by walking and cycling.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.
- This can be easier to achieve in smaller growth nodes like Warkworth given the relatively less developed and lower density urban area enabling this to be implemented as growth occurs.
- The adopted Warkworth structure plan identifies a network of centres and existing or proposed walking and cycling access routes. The development of this network is intrinsic to the projected future growth and population, including the currently FUZs.

Identify areas more constrained by hazards – there are many locations affected by different types of hazards to various degrees. Locations which are highly constrained by hazards may be reduced in capacity depending on the outcomes of adaptation planning. Over time, forgone capacity will be offset by creating additional capacity in good locations elsewhere, so that overall capacity is broadly maintained.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP.
- The proposed approach needs to recognise that much land in Auckland will likely be subject to some degree of flooding, sea level rise, erosion and slips in extreme events.
- Rather than apply a blanket restriction approach to sites or land which are affected, it is more appropriate to provide for opportunities for pocket urban intensification within the areas that are free of hazards or can be made so, while leaving areas where houses exist for other uses such as open space, landscaping and overland flow paths.
- Planning rules and standards (and zones) in areas with larger areas of potential inundation or instability need to be more flexible to permit clustered and higher density nodes rather than the application of blanket minimum site areas.
- It should be recognised that significant events could flood roads preventing thoroughfare for a limited period of time, and in such cases, resilience options should be investigated including alternative roads or at a minimum, walking and cycling opportunities.
- Where access to properties may potentially be restricted for short periods of time due to significant flooding events, that scenario should be included within property information files as a warning to people buying such properties.

Spatial prioritisation – investment needs to be prioritised in areas that will achieve the greatest benefits. Three types of spatial priorities will receive investment in line with their significance: nodes, local areas and communities and joint priorities between council and central government. There is more certainty in the short to medium-term (years 1-10) than in the long-term (years 11-30) where potential major projects offer significant changes and opportunities.

- This is compatible with the current or a similar but refined multi-modal growth model being pursued in the AUP, including the associated future urban land supply strategies and urban structure plans.

- Warkworth is an example of where both a future urban land supply strategy and the Warkworth Structure Plan have set out the shape and timing of development and appropriate infrastructure.

- Given that there will always be changing circumstances over time, both future urban land supply strategies and the structure plans need to be applied in a practical way provided that the key performance measures are achieved and do not adversely impact on the development of other properties.

Future Urban Areas

Remove four areas for urban development because of hazard risk (in whole or in part) – many future urban areas are constrained by different types of hazards. The most hazard constrained parts will be re-zoned to an appropriate non-urban zoning.

- No comment

Identify areas for further investigation – areas with moderate exposure to hazards and other factors to consider such as VKT reduction and infrastructure delays will require further investigation to determine the appropriateness of these areas for urban development.

- Oppose this identification in regard to the Stevenson site and other sites in the north-east sector with a FUZ ("the land") on the basis of the points raised above.

- The land:

  – is close to and well served by public and private transport, which will be further improved as the land is developed and required multimodal transport links enhanced.

  – is very close to the Warkworth town centre, being within 800m walking distance, and before nearer than much of the existing and planned urban development in Warkworth.

  – is well served by and close to infrastructure services including water and wastewater.

  – has less than 10% of its area subject to flooding, and there are engineering methodologies, including nature-based options, which can be applied. These will likely result in better water quality entering the Mahurangi River than from rural farming activities that will otherwise occur.

Defer timing for development readiness – sequencing and timing of development is adjusted to reflect the realities of infrastructure funding and provision and the significant capacity in the existing urban area. New timings for many future urban areas have been proposed.

- Oppose the alteration of the development status of the Stevenson land and other land in the north-east sector from 2033-2037 to 2045+ as:

  – The basis for this is flawed, being largely based on the finding that transport infrastructure is not planned to support development in Warkworth until 2035 at the earliest and North-East Warkworth before 2045.

  – Warkworth is already a significant sub-regional Centre serving northern Rodney and southern Kaipara District.

  – The potential under existing zones for additional commercial and industrial activity has not been adequately recognised. For example, there is more than 60 ha of land in northern Warkworth that has an operative Light Industry Zone and subdivision for light industry sites has been approved.

  – Northern Warkworth has a very high standard of transport infrastructure now that the Puhoi to Warkworth motorway and the Matakana Link Road are open, and this includes the Stevenson and other sites in north-eastern Warkworth.

- More frequent public transport supply can be easily introduced on an 'as required' basis directly related to demand given the capacity of the Puhoi to Warkworth motorway and the unlikely need – other than in the very long-term - for any dedicated bus lane.

- Residential land necessary to support the employment land now provided for under active zonings is necessary, as was fully examined during the AUP process.

- Taking the above into account, even the currently schedule sequences and timings for active zones were overly conservative, particularly in regard to the Stevenson and other sites in the north-east given their proximity to the Warkworth town centre, infrastructure and eastern settlements and beaches.

Development timing based on infrastructure triggers – triggers relate to when all the required bulk infrastructure can be provided to ensure that any development is well- coordinated.

- Generally support. This is a logical and more efficient and effective methodology than arbitrary timeframes which may or may not be realistic based on whether infrastructure is actually delivered and what other events occur in the intervening period.

Part of region wide response to planning and infrastructure – urban and future urban priorities need to be considered together. Prioritisation needs to be based on what provides the most benefit for the whole region, rather than considering outcomes in isolation or in separate geographic areas.

- No comment