Future Development Strategy

Organisations

WRITTEN FEEDBACK
Volume 8

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

Future Development Plan 2023 #8433

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

Too crowded

Accessible local centres

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

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

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

Agree

Tell us why

Avoiding hazards

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

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

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

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

Agree

Tell us why

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Other feedback

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

Future Development Plan 2023 #8492

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Your feedback

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

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

Agree

Tell us why

In urban areas the population is growing rapidly so we need more growth in these areas to facilitate people's lifestyle needs like living, working/schooling and leisure activities. Specifically transport facilities need to be more punctual and accessible e.g. more buses, diverse/longer routes for direct access instead of taking 2 buses.

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

Yes, this will make life more smooth and create a safer/more connected community.

Avoiding hazards

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

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

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

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

Agree

Tell us why

It is smart to investigate locations before making larger investments for further developments.

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

If we give to/protect nature then nature can provide for us. This impacts our future positively and creates a sustainable community.

Other feedback

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

Future Development Plan 2023 #8532

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Your feedback

Focusing growth

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

Tell us why

Accessible local centres

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

Tell us why

Avoiding hazards

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

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

Future Development Strategy Auckland

Submitter: Rayonier Matariki Forests

[redacted]

Consultant

[redacted]

[redacted]

General

1. This submission is made on behalf of Rayonier Matariki Forests (RMF). RMF owns and or manages 120,000 hectares of plantation forests in New Zealand. In the Auckland region it owns Mahurangi Forests and has forestry rights to Woodhill Forest replant, Riverhead Forest, and forests in the Hunuas. RMF also purchases the rights to harvest and sell logs from woodlots in the region. Harvested logs are supplied to local sawmills, to Whangarei Port and in containers to Auckland Port.

2. Forestry operations can be impacted by poor road access and by policies that allow for conflict between forestry operations and adjacent non rural productive land uses such as lifestyle and residential use.

3. The Auckland Rural Productivity Review 2022 notes that Forestry and Logging contribution to the Auckland total GDP was in 2022 just second ($74.2million) to horticulture and Fruit Growing ($83million). In our opinion the Future Development Strategy should ensure that Plantation Forestry along with other rural production land uses are supported and not impeded from continuing to contribute to the GDP of Auckland.

4. The concerns of RMF relate mainly to rural roading access to rural properties and to the potential of reverse sensitivity issues between forestry activities and non-rural production activities.

Specific issues

Rural Roading

Principal 3 (a) (b) and (c)

5. The principle appears to be focused on urban infrastructure. There needs to be specific reference to rural roads and the importance to enabling and supporting rural productive land uses. There are ongoing maintenance issues, such as cleaning out road tables and culverts and repairs from weather events. By not mentioning rural roading infrastructure the

principles are at odds with figure 2 on page 20. The figure is supported especially as the item for “best use of existing system” does not limit the principles to urban infrastructure.

6. Principle 3 (b) should be amended to add the following paragraph:

   “Existing rural roads support the rural productive land uses in l Auckland. Investment in upgrading and maintenance will be prioritised to ensure the efficiency of the existing transport corridors.”

Principle 4 (a)

Tree planting along roading corridors

7. It is not clear if the principle only relates to urban roads. It is not supported for rural roads. Powers lines are invariably located on the “road reserves” of roads. Trees and power lines are not easy partners in sharing of space. The latest consultation document from MIBE for the Review of the Electricity (Hazards from Trees) regulations 2023 advises that the power line works companies are seeking provisions for a fall distance between trees and their power lines. Their reason is based on incidents of power outage caused by falling trees. While urban areas may have more underground power this is not the case in the rural areas.

8. RMF only supports this principle if is limited to urban areas. The principle should be amended to make this clear.

Rural Areas section 4.2.3 limiting rural residential use.

9. RMF supports limiting rural residential growth to those area zoned rural lifestyle. The impact of reverse sensitivity issues, such as agricultural spraying, noise of rural machinery, heavy traffic, can not be underestimated as a negative impact on ongoing rural production land uses. The country lifestyle zones are mapped and known, and rural production land uses no longer must second guess where the threat of ad hoc subdivisions for lifestyle subdivisions may occur.

31 July 2023

Future Development Plan 2023 #8533

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Your feedback

Focusing growth

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

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

Agree

Tell us why

The RBA supports this approach as it reduces urban sprawl, optimizing the use of existing infrastructure, which is often more cost-effective than building new facilities. Furthermore, this strategy allocates more greenfield areas for recreational purposes, promoting the wellbeing of the growing population. However, the success of this plan relies on ensuring that the planned intensification is backed by the provision of purpose-built infrastructure necessary to enhance current urban areas adequately. This will enable Aucklanders to live, work, and enjoy leisure activities within their local communities.

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 RBA endorses this approach because it reduces the need for excessive commuting between home, work, and leisure activities. It aligns with climate action targets and fosters a sense of belonging within local communities. However, to achieve the desired outcomes, it is crucial to provide adequate infrastructure that supports alternate travel modes.
Additionally, affordable public transport must be available to reduce vehicle mileage travelled effectively. The RBA recommends conducting local campaigns to educate residents and employees about the availability and benefits of alternate modes of transportation, thereby reducing car dependency.

Avoiding hazards

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

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

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

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

Agree

Tell us why

The RBA supports this approach, as recent natural disasters have demonstrated the vulnerability of certain areas in the region. Swift action is necessary to protect communities and prevent businesses and households from enduring severe impacts. The RBA urges prioritizing the assessment of development-enabled vulnerable locations and implementing necessary remedial work to mitigate risks and support adaptive measures in these communities. These assessments should occur before considering future development in areas with significant natural hazard risks.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

The RBA generally agrees with this approach, provided there is adequate investment in day-to-day infrastructure necessary for intensified urban communities. It is essential to maintain traditional infrastructure for clean water, stormwater, wastewater, and roadways, along with alternate mode pathways. Striking a balance between nature-based and conventional infrastructure investment will lead to better outcomes for current and future communities. The RBA is actively involved in a pilot project focused on food waste, showcasing our proactive stance in this area.

Other feedback

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

The RBA appreciates the intent to prioritize investment in areas with significant needs, addressing disparities in the region. However, we recommend not dismissing development opportunities, especially for business growth, in other areas where local communities could benefit from such initiatives.

We also welcome the acknowledgement in the Consultation Document Principle 5(c) of the inequities in business land distribution and the commitment to safeguard business sites for long-term needs. Additionally, we acknowledge the statements on page 31 of the same document, recognizing sufficient region-wide plan-enabled business capacity, with potential shortfalls in the short to medium term. The RBA urges the Council to expedite the provision of additional business-zoned land in the medium to long-term plans to mitigate this risk.

In conclusion, the RBA largely supports the approaches outlined in Auckland's Future Development Strategy. However, we would like to draw attention to the various caveats expressed in this submission. We request the Council to duly consider these points while making future development decisions.

#8533

Submission: Auckland's Future Development Strategy 24th July 2023

Rosebank Business Association

[redacted] – Executive Engagement Manager

Phone [redacted]

Email: [redacted]

Stronger together

www.rosebankbusiness.co.nz

18 Jomac Place, Rosebank, Auckland 1026
PO Box 151190, New Lynn, 0640, Auckland, Phone: 820 0551

24th July 2023

Auckland Council

Attention: Future Development Strategy

Freepost Authority 190153

Private Bag 92300, Victoria Street West

Auckland, 1142

futuredevelopmentstrategy@aucklandcouncil.govt.nz

Submission to Auckland's Future Development Strategy

Auckland Council is seeking feedback on Auckland's Future Development Strategy.

Introduction

The Rosebank Business Association (RBA) representing the Rosebank Business Improvement District (BID) welcomes the opportunity to make this Submission to Auckland's Future Development Strategy.

The RBA is a significant industrial Business Improvement District (BID), representing over 600 commercial property owners and businesses within the West Auckland area. Collectively they employ over 9,000 Auckland residents and ratepayers. The organisation is located within the Whau Local Board area and is one of the leading commercial and industrial areas within Auckland.

The RBA represents and works with a wide range of businesses comprising a mix of sole traders, Small and Medium Enterprises (SME), through to multi-national organisations representing sectors such as ICT, business services, specialist manufacturing, light-medium warehousing, logistics, retail, and hospitality. In addition, we have key educational institutions bordering our boundary, including Rosebank School, Avondale Intermediate, and Avondale College.

Background

Auckland Council has commented:

That the Future Development Strategy (FDS) sets out the big-picture vision for how and where we should grow over the next 30 years to achieve the best outcomes for Tāmaki Makaurau.

There has been a lot of change recently. The central government introduced legislation for more housing intensification across the city. The effects of climate change are being felt more frequently, as seen by the Auckland Anniversary floods and Cyclone Gabrielle. We also

have a commitment to halve our greenhouse gas emissions by 2030 and reach net zero emissions by 2050. The way we grow and develop should improve the environment, avoid hazards and help address the impacts of climate change.

This changing context means we need to update our strategy for how the city grows in the future. There are many ways cities can grow. We propose that most new housing and business development be in the existing city near town centres, good public transport services and jobs, rather than spread out across the region. Focusing growth in our existing urban areas, rather than more growth on the edges, results in improvements to the environment, the economy, and people's wellbeing.

We would like your feedback on our approach to how and where Auckland should grow and change.

Rosebank Business Association (RBA) Feedback:

(1) 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 RBA supports this approach as it reduces urban sprawl, optimizing the use of existing infrastructure, which is often more cost-effective than building new facilities. Furthermore, this strategy allocates more greenfield areas for recreational purposes, promoting the well-being of the growing population. However, the success of this plan relies on ensuring that the planned intensification is backed by the provision of purpose-built infrastructure necessary to enhance current urban areas adequately. This will enable Aucklanders to live, work, and enjoy leisure activities within their local communities.

(2) 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 peoples' 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 RBA endorses this approach because it reduces the need for excessive commuting between home, work, and leisure activities. It aligns with climate action targets and fosters a sense of belonging within local communities. However, to achieve the desired outcomes, it is crucial to provide adequate infrastructure that supports alternate travel modes. Additionally, affordable public transport must be available to reduce vehicle mileage travelled effectively. The RBA recommends conducting local campaigns to educate residents and employees about the availability and benefits of alternate modes of transportation, thereby reducing car dependency.

(3) Avoiding Hazards:

As our climate changes, the frequency and severity of hazards such as 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?

The RBA supports this approach, as recent natural disasters have demonstrated the vulnerability of certain areas in the region. Swift action is necessary to protect communities and prevent businesses and households from enduring severe impacts. The RBA urges prioritizing the assessment of development-enabled vulnerable locations and implementing necessary remedial work to mitigate risks and support adaptive measures in these communities. These assessments should occur before considering future development in areas with significant natural hazard risks.

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 prioritizing investment in infrastructure that is decentralized, nature-based, regenerative and mauri-enhancing.

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

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communities. The RBA is actively involved in a pilot project focused on food waste, showcasing our proactive stance in this area.

(4) Other Feedback:

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

The RBA appreciates the intent to prioritize investment in areas with significant needs, addressing disparities in the region. However, we recommend not dismissing development opportunities, especially for business growth, in other areas where local communities could benefit from such initiatives.

We also welcome the acknowledgement in the Consultation Document Principle 5(c) of the inequities in business land distribution and the commitment to safeguard business sites for long-term needs. Additionally, we acknowledge the statements on page 31 of the same document, recognizing sufficient region-wide plan-enabled business capacity, with potential shortfalls in the short to medium term. The RBA urges the Council to expedite the provision of additional business-zoned land in the medium to long-term plans to mitigate this risk.

Conclusion:

In conclusion, the RBA largely supports the approaches outlined in Auckland's Future Development Strategy. However, we would like to draw attention to the various caveats expressed in this submission. We request the Council to duly consider these points while making future development decisions.

If you have any questions or would like to discuss this further, please feel free to contact us.

Yours sincerely,





Executive Engagement Manager

Future Development Plan 2023 #8535

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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

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Tell us why

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

Tell us why

Resilient infrastructure

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

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

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

#8535

FEEDBACK ON AUCKLAND COUNCIL'S

DRAFT FUTURE DEVELOPMENT STRATEGY 2023-2053

To: Auckland Council

Private Bag 92300, Victoria St West, Auckland 1142

Feedback on: Draft Auckland Future Development Strategy 2023-2035

Name: Cabra Developments Limited

1. Introduction

1.1. Cabra Developments Limited (**Cabra**) is a land development company established in 1987 specialising in greenfield subdivision and residential development within the western and northern parts of the Auckland region. Cabra is committed to contributing to the response to critical housing demand through provision of additional serviced lots and/or dwellings for residential development to the private market, thus facilitating housing supply and enabling growth within Auckland.

1.2. Cabra has successfully undertaken the subdivision of several large land parcels in the region (including in Huapai Triangle, Riverhead, Orewa, Greenhithe, Papakura, Snells Beach and Whangaparaoa) and has a proven track record in the delivery of quality residential outcomes.

1.3. Cabra also has numerous landholdings in Whenuapai, within the extent of the Whenuapai Structure Plan area and the former Plan Change 5 area, a process which Cabra was heavily involved with prior to the Plan Change application being withdrawn by Auckland Council.

2. Background

2.1. The Whenuapai Structure Plan (**WSP**) prepared by Auckland Council dated September 2016 anticipated the land to the south of the NZDF Airbase within Stage 1 (together with a pocket to the west at Kennedy's Road), with the balance of land to the west and north of the NZDF Airbase within Stage 2. Stage 1 identified areas of residential and business land that could be development ready within 2-10 years' (2018-2026) by relying on existing infrastructure or where limited improvement was required. Stage 2 identified areas where future investment in new infrastructure was not anticipated until after 2027.

2.2. Consistent with the WSP, the Future Urban Land Supply Strategy (**FULSS**) prepared by Auckland Council dated July 2017 anticipated Whenuapai Stage 1 would be 'live zoned' between 2018-2022. Following this, Whenuapai Stage 2 was anticipated to be 'live zoned' between 2028-2032.

2.3. Accordingly, in 2017 Auckland Council progressed with preparing and notifying a plan change application to rezone Whenuapai Stage 1 (referred as Plan Change 5 (**PC5**)) from Future Urban zone to a combination of residential and light industry zones. Despite proceeding to hearings, and informal notification of a variation to PC5, after delay for various reasons, including to enable further aircraft noise testing and to further consider mechanisms for the funding and financing of arterial road upgrades, Auckland Council withdrew PC5 in June 2022.

2.4. The Auckland Future Development Strategy 2023-2053 (**FDS**) provides a 30-year outlook for growth in the Auckland region, forecasting development across two spatial priority areas/tranches: Years 1-10 and Years 11-30.

2.5. Auckland Housing Programme areas including Mt Roskill, Mangere, Tamaki, the City Centre, and the Metropolitan Centres of Westgate and Drury-Opaheke are identified within Years 1-10. Future Urban zoned areas are identified within the later bracket.

2.6. Of relevance to this submission, the general location of Cabra's landholdings is illustrated in red in Figure 1, including:

- 15 Clarks Lane, Whenuapai
- 10, 14 and 16 Sinton Road, Whenuapai
- 90 Trig Road, Whenuapai.

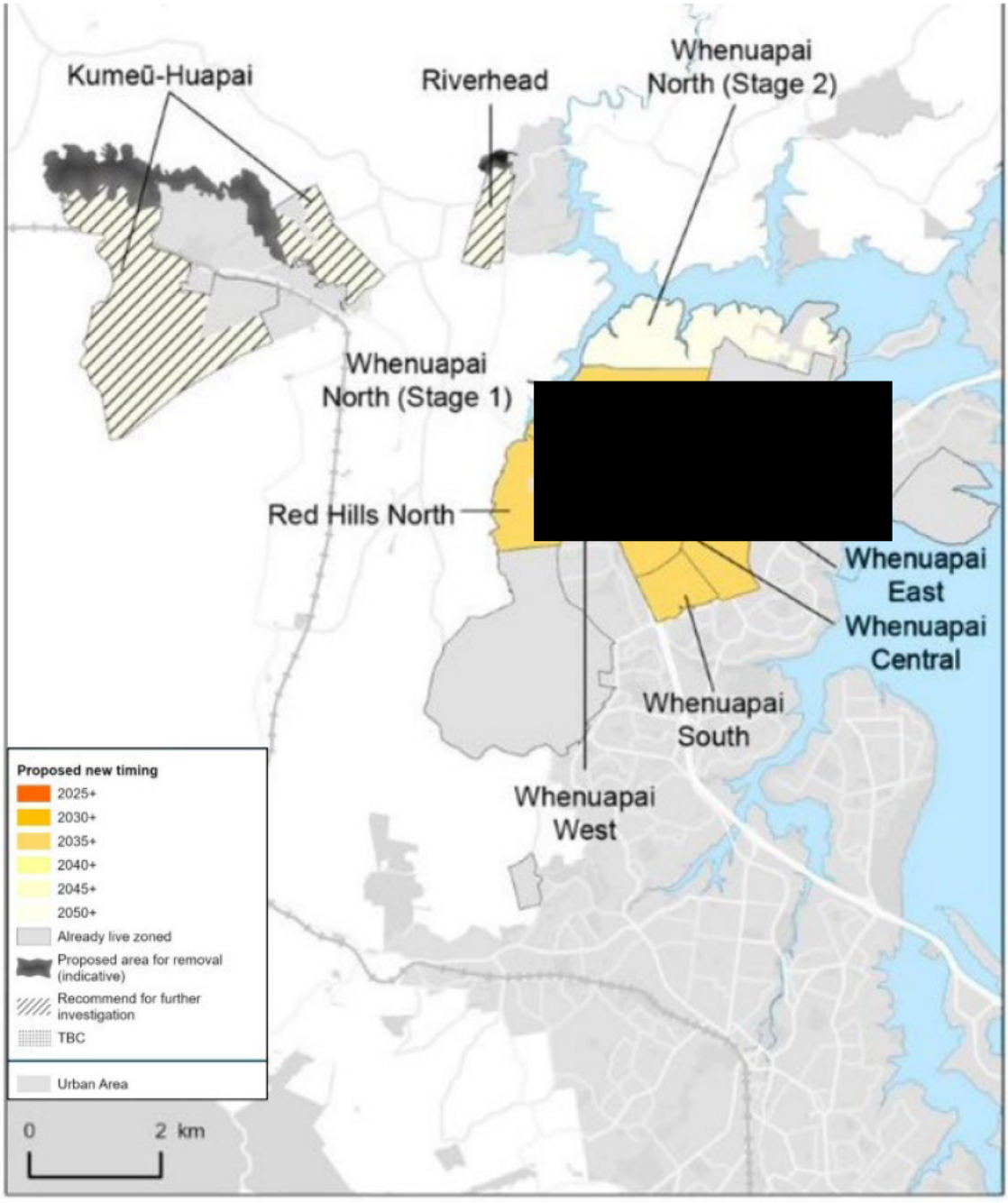
2.7. All sites are zoned Future Urban under the current Auckland Unitary Plan, automatically falling into the Year 11-30 spatial priority bracket.

2.8. The Clarks Lane and Sinton Road sites are located within the 'Whenuapai East' area as shown at Figure 1, pushing development ready status out from 2018-2022 under the FULSS to 2035+ under the FDS. These sites are anticipated for medium residential activity under the WSP.

2.9. The Trig Road site is located within the 'Whenuapai Central' area as shown at Figure 1, also pushing development ready status out from 2018-2022 under the FULSS to 2035+ under the FDS. This site is anticipated for light industrial activity under the WSP.

Figure 1 – Excerpt from FDS

(Figure 42 - Proposed timing and approach for Kumeū-Huapai, Riverhead, Whenuapai and Redhills future urban areas; general location of Cabra [redacted])



3. Feedback on Draft FDS

3.1. The draft FDS identifies that the advent of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act and the implementation of medium density residential zoning, alongside mandatory intensification of specific urban areas has required a "rethink" of how the Council plans for and services growth.

3.2. The draft FDS identifies five principles for guiding growth and development. Cabra makes the following comments in respect of these principles insofar as they relate to Whenuapai East in particular. At the outset, Cabra records its disagreement with the draft FDS' heavily weighted favouring of brownfield or existing urban areas for the focus of growth, on the basis of what are broad and in some instances inaccurate generalisations regarding the potential benefits of greenfield growth.

3.3. Cabra suggests that if the impetus for revisiting the city's growth strategy arises from the implementation of medium density residential standards and the other intensification policies set out in Plan Change 78 (and others) to the Auckland Unitary Plan (AUP), that it might be more appropriate to await the outcome of that process, rather than leapfrog it as the draft FDS has now done. PC78 has stalled and its future uncertain, as are its outcomes. To that end, it would appear the draft FDS is shadowboxing as regards the statutory context in which growth must be accommodated.

3.4. Notwithstanding, the following comments are made.

Principle 1 – Support greenhouse gas emissions

3.5. Principle 1(a) makes a broad assumption that greenfield development will result in a high 'vehicle kilometres travelled' (**VKT**), as compared to brownfield intensification. Principle 1(b) seeks to strengthen accessible, walkable and mixed-use neighbourhoods. Principle 1(c) seeks to bring jobs and people together, to reduce the VKT.

3.6. The Westgate Metropolitan Centre is identified as a key employment hub, and as being suitable for further development within Years 1-10 of the FDS. It follows therefore, based on the principles summarised above, that the land surrounding this hub would be programmed similarly, within Years 1-10 to deliver residential development at the same time as growth occurs within the Centre, providing a local catchment of employees and customers with a low VKT to travel between the residential catchment and the Centre.

3.7. At Appendix page 55, the FDS states. *"Westgate is linked with the Whenuapai future urban area which is expected to provide a range of employment opportunities. The delivery of infrastructure for Whenuapai future urban area supports unlocking business land much needed in the north-west to help address the shortage of employment land. Prioritising funding for delivery of a range of infrastructure projects in the short to medium term will ensure Westgate, including the Whenuapai area is well-prepared to take up the benefit of rapid transit. Projects needed to unlock this area include several local road and State Highway upgrades, pump station upgrades, wastewater projects and a water main project. In particular, the delivery of infrastructure for Whenuapai future urban area will support unlocking business land that is much needed in the north-west.*"

3.8. Cabra agrees that the Whenuapai future urban area will support unlocking the Westgate business land, however the FDS does not appear to align residential growth and business growth simultaneously. Residential activity within Whenuapai will not come on-line until the decade following Westgate, and once 'live zoned' between Years 11-30 will take several years to consent, construct and handover residential dwellings to future local employees and customers of the Westgate Metropolitan Centre. In the meantime, employees and customers will require greater VKT to service and access the Westgate Metropolitan Centre.

3.9. Cabra considers therefore that, as a minimum, the forecasted residential areas of Whenuapai should be bought forward to the Year 1-10 tranche, hand-in-hand with local business growth in order for the FDS to deliver on Principle 1.

Principle 2 – Adapt to the impacts of climate change

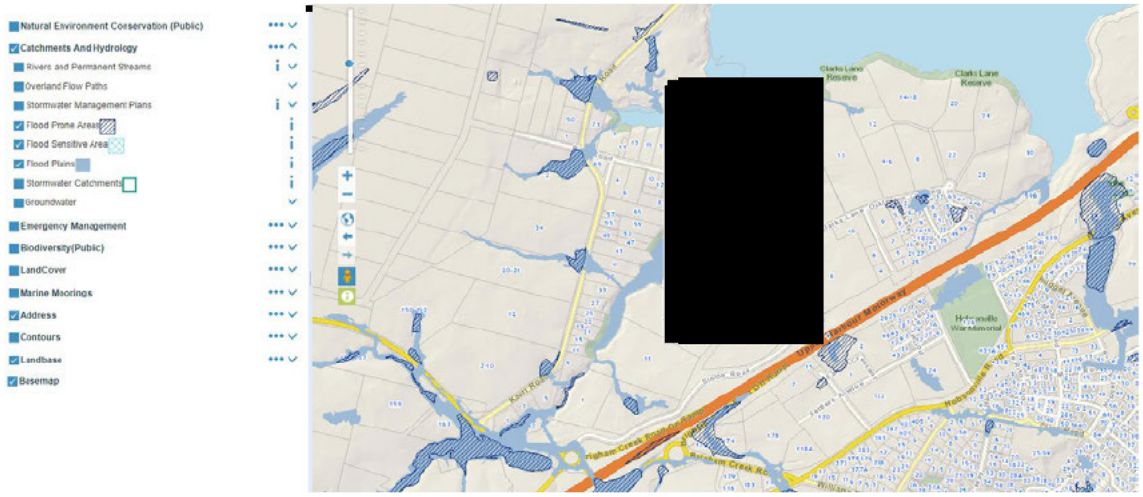
3.10. Principle 2(a) seeks to avoid further growth in hazard areas, and states that "growth will not be enabled in known hazard areas where people, property or infrastructure would be exposed to significant risk".

3.11. While Cabra supports this intent, it considers that larger development sites, often in greenfield areas, have greater ability to incorporate a low-impact environment-led management response to flood hazards. The appropriateness and cost of engineered solutions should be assessed on a case-by-case basis, rather than adopting a 'no development' blanket approach to managing hazard effects in greenfield development, as doing so risks leaving otherwise suitable land undeveloped.

3.12. The corollary of discouraging residential development in flood hazard areas is that development should be encouraged in Future Urban areas that are not subject to flood hazards, facilitating residential development capacity in appropriate locations. For example, Whenuapai East is not subject to widespread flooding or inundation. Such hazards are limited to isolated locations which can be readily managed and are located outside of Cabra's landholdings as shown in Figure 2.

Figure 2 – Whenuapai East flood hazard map

(Cabra landholdings [redacted])



Principle 3 – Make efficient and equitable infrastructure investments

3.13. Principle 3(a) seeks to take a regional view to infrastructure investment and costs, Principle 3(b) seeks to make the best use of existing infrastructure, and Principle 3(c) seeks to make investment decisions that deliver on multiple outcomes.

3.14. Firstly, these principles assume that private development must be reliant on public investment to deliver the infrastructure that is required to facilitate growth and development. This does not recognise the role that private developers can play in funding and delivering infrastructure to service their own development, and in some cases to also facilitate, provide for or futureproof infrastructure capacity for the wider existing or future community, alleviating Council of this capital cost outlay.

3.15. Developers are often forthcoming to deliver the infrastructure that is required to enable development and welcome the opportunity to work with Council's infrastructure teams and CCO's to do so. Equally, developers acknowledge the requirement to pay Development Contributions to wider upgrades and would be eager to enter into an Infrastructure Funding Agreement with Council if it expedited the delivery of shared infrastructure to unlock a growth area. Many such options were presented to Council throughout the PC5 process as mechanisms to share the cost of roading 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.

3.16. These alternative funding propositions are not welcomed or encouraged by the FDS as, broadly speaking, Council considers this will result in the ad-hoc delivery of infrastructure.

This is not the case in areas where extensive masterplanning, analysis and consultation have occurred, such as that undertaken by Council when preparing the WSP and subsequently PC5.

3.17. Secondly, the significant delays proposed in the FDS stem from Council's position that all infrastructure is required to be operational before the 'first cab can leave the rank'. As evidenced by the FDS, this approach will result in significant delays, holding up all development in the respective area while Council firstly funds, and then consents and constructs, up front infrastructure in advance of development. As we have seen region-wide, this approach results in construction costs growing over time becoming more difficult for Council to fund as time progresses to the point where no upgrades occur as a result.

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

3.19. Instead, Appendix Page 27 provides a list of costly infrastructure, all of which is required to be in place before the FDS considers the area suitable for the 'full build out' of growth, including:

<u>Whenuapai East</u>

- Brigham Creek Road upgrade
- SH16 to SH18 Connections
- Upper Harbour (SH18) Rapid Transit
- 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

<u>Whenuapai Central</u>

- Spedding Road / Northside Drive connection over SH16
- SH16 to SH18 Connections
- North-west Rapid Transit
- Spedding Road Upgrade and Extension

- Mamari Road Upgrade and Extension
- Trig Road Water Reservoir, North Harbour No. 2 Watermain Project
- Brigham Creek Pump Station Whenuapai Redhill Package 1
- Northern Redhills to Brigham Creek Wastewater Project

3.20. Each of the listed infrastructure projects are significant individually, both in terms of time and cost, but it is virtually impossible to expect Council to fund, consent and construct all of the above in a timely manner, based on previous track record. For example, the SH16 Brigham Creek-Waimauku upgrades have been funded since the 2021 RLTP, however the southern part of this NOR (relating to Whenuapai) is yet to be notified some two years' later, demonstrating the significant lead-in time, even when funding is secured.

3.21. The FDS provides an opportunity to encourage developers and Council to achieve a coordinated funding and financing approach via an IFA to facilitate private contributions to expedite infrastructure provision. This would also facilitate a staged development approach to both infrastructure delivery and growth enabling short-term growth to occur in advance of the full build-out of all listed infrastructure, provided development is consistent with a wider structure plan.

3.22. In the case of Cabra's landholdings in Whenuapai East, it has demonstrated that all necessary infrastructure can be provided by Cabra, while also futureproofing capacity for growth within the catchment. Cabra has reiterated to Council its willingness to work with Council to agree an IFA or other mechanism to enable further growth in the south eastern corner of Whenuapai, however no such discussions have eventuated.

3.23. In summary, Cabra 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.

3.24. Finally, related to the economical and equitable provision of infrastructure, it is more cost effective for Council to purchase land for the purposes of open spaces, infrastructure and community facilities in greenfield locations where land is cheaper, than in brownfield locations.

Principle 4 – Protect and restore the natural environment

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

3.26. Comprehensive structure planning such as that undertaken in respect of the WSP can achieve these outcomes as greenfield developments often have land area to accommodate water sensitive design and to enhance the quality of wetlands. The

outcomes sought to be achieved by Principle 4 are embedded in the National Policy Statement for Freshwater Management 2020 (which development must give effect to), and the regulations contained within the National Environmental Standards for Freshwater 2020 ensuring that greenfield development will achieve Principle 4. Ecological assessments are widely acknowledged as being required as part of any greenfield development or subdivision with conditions of consent requiring management plans to protect and enhance ecosystems and habitats common practice. As such, the aspirations of Principle 4 can be readily achieved through specialist input at the structure planning and consenting stage of greenfield development. This is not therefore another reason to delay growth in future urban areas.

Principle 5 – Enable sufficient capacity for growth in the right place at the right time

3.27. Principle 5 seeks to discourage growth in areas not already prioritised by Council, despite the National Policy Statement for Urban Development 2020 (**NPS-UD**) clearly directing local authorities to be more responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is unanticipated by RMA planning documents or is out-of-sequence with planned land release (Policy 8).

3.28. The FDS is intended to determine the sequencing and timing for when a future urban area will be ready for development to commence, with structure planning providing the next level of detail to effectively integrate land uses with infrastructure provision. Section 1.4.7 of the Future Urban Areas Evidence Report (June 2023) (**FUA Evidence Report**) acknowledges that structure plans are required by the AUP to establish the appropriate pattern of land use and infrastructure, opportunities and constraints, the effects of urbanisation on (and connectivity with) neighbouring areas.

3.29. Neither the FDS nor FUA Evidence Report suitably acknowledge the WSP, an existing structure plan for Whenuapai Stages 1 and 2. While the land remains Future Urban in zone, there is a clear expectation of urban growth such that development in this area is not entirely unanticipated or out-of-sequence. Council undertook years of work and extensive public consultation to prepare and produce this structure plan. The FUA Evidence Report criticises private plan changes for the isolated view often taken relative to structure planning the subject piece of land. This is not the case for the WSP, which was Council-led and takes a wholly integrated and comprehensive view across the wider Whenuapai area, including its relationship to and connectivity with neighbouring communities including Westgate and Hobsonville.

3.30. The FDS states *"…future urban areas will be sequenced, with this sequencing linked to triggers dependent on when <u>all</u> the required bulk infrastructure can be provided."* The

bulk infrastructure that is listed as being required in Whenuapai East and Central is extensive and as discussed above, not all of which is required to be implemented before development commences. Specific to Cabra, Whenuapai East can be serviced independently of the balance of Whenuapai with costs being met by developers, and as the area is in a walkable catchment of the Hobsonville Town Centre which provides public transport connections to Westgate and Hobsonville, there is no need to delay growth in Whenuapai East to 2035+ therefore.

3.31. The NPS-UD does not require the respective local authority to fund infrastructure that is necessary to delivery out-of-sequence development. Plainly, the onus falls on the applicant/developer to deliver infrastructure that is required to service the development, as well as to provide/contribute to infrastructure that is identified as being required by a relevant structure plan or precinct plan. Cabra acknowledges its requirements to fund infrastructure necessary to service its development as well to connect the site with Hobsonville Town Centre, consistent with the WSP.

3.32. To appropriately deliver the intended outcomes of Principle 5, the FDS should build on the work undertaken to date as part of the WSP to enable 'self-serviced' development to progress in line with local business growth within the adjacent Westgate priority area.

Other matters

3.33. Finally, section 1.3.7 of the FUA Evidence Report states that highly productive land 'is a factor to be considered in terms of context for this report but is not a determining factor'. Clause 3.4 of the National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**) clearly excludes Future Urban zoned land from the NPS-HPL, which states *"despite anything else in this clause, land that, at the commencement date, is identified for future urban development must not be mapped as highly productive land."* Future Urban zoned land is clearly excluded from the NPS-HPL, and therefore should indeed be a determining factor when considering whether or not to facilitate growth.

4. Key concerns

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

4.2. Cabra suggests the draft FDS is premature and should await the outcome of PC78 and associated implementation of medium density residential standards and intensification policies that implicate urban growth and servicing priorities.

4.3. Cabra generally supports the principles for guiding growth so long as fair recognition is given to the potential for greenfield opportunities to sustainably deliver growth in accordance with those principles.

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

4.5. Cabra is concerned that the FDS provides inadequate reference to the WSP, a comprehensively prepared structure plan that should be relied on and built on further to expedite growth in Whenuapai at a rate coincident with the adjacent Westgate Metropolitan Centre, an FDS priority area.

4.6. Whenuapai East meets the Council's own principles for enabling development in the Year 1-11 tranche of growth, aligning local residential growth with the planned business growth in Westgate (a priority area) to support the vitality of the Centre and reduce VKT accordingly. It can be serviced independently of the balance of Whenuapai with costs being met by developers, and as the area is in a walkable catchment of the Hobsonville Town Centre which provides public transport connections to Westgate and Hobsonville, there is no need to delay growth in Whenuapai East to 2035+.

Dated 31 July 2023

Signature **CABRA DEVELOPMENTS LIMITED**

[redacted] (General Manager)

Address for Service [redacted]

Future Development Plan 2023 #8536

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

The submitter opposes the recommendation in the Strategy to remove the Future Urban Zone from the land at Alfriston Road, Ardmore and to re-zone the land Rural.

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

Stephen Brownhill Barrister

#8536

[redacted]

31 July 2023

Auckland Council
Level 24, 135 Albert Street
Private Bag 92300, Victoria Street West
AUCKLAND 1142

Attention: Future Development Strategy

E: futuredevelopmentstrategy@aucklandcouncil.govt.nz

DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY

I act for [redacted], the owner of the land at [redacted] Alfriston Road, Ardmore.

I **enclose** a submission to the Draft Auckland Future Development Strategy on behalf of [redacted]

Yours sincerely

[redacted]

Stephen Brownhill

#8536

IN THE MATTER OF the Draft Auckland Future Development Strategy 2023 -2053

SUBMISSION OF COUNSEL FOR [redacted]

31 July 2023

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1. INTRODUCTION

1.1. Auckland Council has issued the Draft Auckland Future Development Strategy 2023 – 2053 (**Strategy**) for public consultation. The Strategy relates primarily to the planning and development of Auckland's built environment in the next thirty years.

1.2. While the Strategy is essentially a discussion document without a specific statutory purpose it includes proposals to re-zone future urban zoned land to rural or rural-residential. The rationale for this is to promote quality development and regenerate the environment.

2. SUBMITTER DETAILS

2.1. The submitter is [redacted] is the owner of the land at [redacted] Alfriston Road, Ardmore (being [redacted] (**the land**).

2.2. This submission is made on behalf of [redacted] by his counsel Stephen Brownhill.

2.3. The address for service of the submitter is [redacted]

3. THE LAND: CURRENT ZONING REGIME AND PROPOSED FUTURE STRATEGY

3.1. The land is zoned 'Future Urban Zone' in the Auckland Unitary Plan (**AUP**).

3.2. This is described[1] as a transitional zone which applies to green field land that has been identified as suitable for urbanisation. Land may be used for a range of general rural activities but cannot be used for urban activities until the site is rezoned for urban purposes.

3.3. The objectives and policies[2] elaborate. They allow for land to be used and developed to achieve the objectives of the Rural – Rural Productive Zone, and seek to contain urban development until the land is re-zoned for urban use and development. To that effect,

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1 AUP, H18.1.

2 AUP, H18.2, H18.3.

subdivision, use and development should maintain and complement rural character and amenity and must not compromise future urban development.

3.4. Land in this zone can be put to urban use and development during its transition. The rules[3] provide for a range of rural and urban activity and establish that urban activity is both permitted and subject to resource consent. Dwellings and home occupations are permitted activities.[4] Council sometimes allows resource consent for certain urban activities with an expiry timeframe in anticipation of future rezoning.

3.5. These provisions have been in force since the AUP became operative in part on 15 November 2016, following a rigorous review process which determined that the specific rural areas were suitable for future urban use and development.

3.6. The Strategy proposes the removal of the Takaanini area as future urban land and its reversion to Rural. This includes the submitter's land at Alfriston.[5] While the Auckland Future Urban Land Supply Strategy (FULSS) projected the timing of the rezoning of land at Takaanini to be 2043-2047, this is deemed no longer applicable. The Strategy recommends removal of the Future Urban Zone from the whole of Takaanini.

3.7. The submitter has received planning advice that this will mean that the Land Use Capability (LUC) 2 classification (prime soil) will apply to the site. As such, the land will be subject to the Highly Productive Land definition under the National Policy Statement for Highly Productive Land 2022 (that came into force on 17 October 2022). This will place restrictions on rezoning, subdivision and land use proposals for urban use.

3.8. The basis for the recommendation to remove the Future Urban Zone from the whole of Takaanini is the anticipated settlement and hazard risks posed by the geology of the area and a significant flood plain exposure north of the Papakura Stream.[6]

4. THE SUBMISSION IS:

4.1. The submitter **opposes** the recommendation in the Strategy to remove the Future Urban Zone from the land at [redacted] Alfriston Road, Ardmore and to re-zone the land Rural.

5. THE REASONS FOR THE SUBMITTER'S OPPOSITION TO THE RECOMMENDATION ARE:

5.1. The submitter was motivated to purchase the land in February 2022 because he was encouraged by the Future Urban zoning in the AUP, which identified the area as being suitable for future urban use and development. Should the Future Urban zone be removed and the land re-zoned Rural, the market value of the land will significantly diminish as will the submitter's future prospects to use and develop the land for residential purposes.

5.2. In this regard the submitter is entitled to rely upon the provisions of the AUP, which have become operative in part following a lengthy and rigorous statutory Plan review process including public consultation, submissions and hearings. The nature of the geology and extent of the potential effects of flood plain exposure and settlement and hazard risks in Takaanini were the subject of reports and recommendations in the course of the review. It concluded

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3 AUP, H18.4.
4 AUP, H18.4 (A27), (A33).
5 Appendix 5, Figure 38, page 36, Figure 39, page 41. .
6 Strategy, at page 92.

that the area was suitable for urban use and development and appropriately zoned Future Urban Zone.

5.3. It is unconscionable for a territorial authority to essentially disregard the current planning regime and the investment by the submitter and many others by proposing to remove the Future Urban Zone from Takaanini and replace it with Rural. The justification for the recommendation in the Strategy appears to be the recent rainfall events in the region that resulted in significant flooding and other effects. While the effects were significant and affected existing housing and infrastructure, they were mainly localised to coastal and low-lying areas. Despite the extent and potential exposure to the flood plain north of Papakura Stream, the heavy rainfall did not have a significant impact on the submitter's land.

5.4. The recommendation is not only contrary to the provision made for future urban growth in this area under the AUP, but is also in opposition to the National Policy Statement on Urban Development 2020 and the Medium Density Residential Standards included in the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

5.5. Retention of the current Future Urban Zone on the land will not compromise the principles for growth and change and the spatial planning outcomes in the Strategy. The submitter's land is also not located in an area recognised as being highly productive rural land and containing prime soils, which calls into question whether reversion of the land to Rural is appropriate.

5.6. The proposal will also not achieve the purpose in section 5(1) of the Resource Management Act 1991, which is to promote the sustainable management of natural and physical resources. Removal of the Future Urban Zone from the submitter's land is also contrary to the need to enable people and communities to provide for their social and economic welfare by providing for future urban use and development, while also managing any adverse effects of activities on the environment, pursuant to section 5(2).

6. THE SUBMITTER SEEKS THE FOLLOWING RELIEF:

6.1. Retention of the Future Urban Zone on the submitter's land.

6.2. Cancel the proposal to rezone the land Rural.

6.3. Amend the Strategy to achieve the outcome and relief sought by the submitter.

Dated 31 July 2023

[redacted]

Stephen Brownhill Barrister
[redacted]

[redacted]

Future Development Plan 2023 #8538

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Tell us why

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

See attachment



Disabled Persons Assembly NZ

July 2023

To Auckland Council,

Please find attached DPA's submission on Future Development Strategy

For any further inquiries, please contact:

Chris Ford
Regional Policy Advisor (Local Government)
Acting Kaituitui – Wellington Region
policy@dpa.org.nz

Introducing Disabled Persons Assembly NZ

We work on systemic change for the equity of disabled people

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People's Organisation run by and for disabled people.

We recognise:

- Māori as Tangata Whenua and Te Tiriti o Waitangi as the founding document of Aotearoa New Zealand;
- disabled people as experts on their own lives;
- the Social Model of Disability as the guiding principle for interpreting disability and impairment;
- the United Nations Convention on the Rights of Persons with Disabilities as the basis for disabled people's relationship with the State;
- the New Zealand Disability Strategy as Government agencies' guide on disability issues; and
- the Enabling Good Lives Principles, Whāia Te Ao Mārama: Māori Disability Action Plan, and Faiva Ora: National Pasifika Disability Disability Plan as avenues to disabled people gaining greater choice and control over their lives and supports.

We drive systemic change through:

- **Leadership:** reflecting the collective voice of disabled people, locally, nationally and internationally.
- **Information and advice:** informing and advising on policies impacting on the lives of disabled people.
- **Advocacy:** supporting disabled people to have a voice, including a collective voice, in society.
- **Monitoring**: monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

UN Convention on the Rights of Persons with Disabilities

DPA was influential in creating the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), a foundational document for disabled people which New Zealand has signed and ratified, confirming that disabled people must have the same human rights as everyone else. All state bodies in New Zealand, including local and regional government, have a responsibility to uphold the principles and articles of this convention. There are a number of UNCRPD articles particularly relevant to this submission, including:

Article 3 – General principles

Article 9 – Accessibility

Article 19 – Living independently and being included in the community

Article 9 refers to the obligation for States parties to identify and eliminate obstacles and barriers to accessibility, including "buildings, roads, transportation and other indoor and outdoor facilities".[1]

Article 30 – Participation in cultural life, recreation, leisure and sport

New Zealand Disability Strategy 2016-2026

Since ratifying the UNCRPD, the New Zealand Government has established a Disability Strategy[2] to guide the work of government agencies on disability issues. The vision is that New Zealand be a non-disabling society, where disabled people have equal opportunity to achieve their goals and aspirations, and that all of New Zealand works together to make this happen. It identifies eight outcome areas contributing to achieving this vision. There are a number of Strategy outcomes particularly relevant to this submission, including:

Outcome 5 – Accessibility

The Submission

DPA welcomes this opportunity to engage on the Auckland Council Future Development Strategy being proposed by Auckland Council.

DPA sees this future strategy (and others around the country) as presenting an opportunity to plan for the growth of our main urban centres, with Tāmaki Makaurau/Auckland facing huge challenges being the largest city in the country and with significant population growth projected to continue.

For disabled people, accessibility is not just seen as an add on but an essential component of planning for Auckland's growth over the next 30 years.

According to the 2013 Statistics New Zealand Disability Survey one in four New Zealanders have a disability or long-term health condition. Māori and Pacific peoples have an even higher-than-average rate of disability. There were approximately 271,000 disabled people residing in Auckland in that year (the latest data available), a number which rises to over 300,000 when accounting for current population increase.[1]

The number of disabled people in Auckland's population is projected to increase (along with the rest of the country) by 2053 due to the high incidence of ageing within the population, amongst other factors.

DPA believes that building an inclusive Auckland where everyone, including disabled people can fully participate in their communities without barriers should be the overriding objective of Auckland Council in terms of this plan.

Our submission and recommendations will cover the following main areas outlined in the consultation survey form:

- Focusing growth
- Accessible local centres
- Avoiding hazards (climate related)
- Resilient infrastructure

[1] Statistics New Zealand. (2013). New Zealand Disability Survey. Retrieved from http://archive.stats.govt.nz/browse_for_stats/health/disabilities/DisabilitySurvey_HOTP2013.aspx#gsc.tab=0 5

DPA Auckland members contributed their views to this submission.

We will briefly background the main challenges facing disabled people in terms of housing, transport, climate change and infrastructure.

1.) Background

a.) Housing

The housing situation for disabled people is currently still dire in Tāmaki Makaurau as much as it is around the country.

For this reason, disabled people are one group who are disproportionately impacted by homelessness. This is due to disabled people being overrepresented amongst low-income earners while also facing higher living costs due to disability. For this reason, disabled people are more likely to be renters; 2018 data from Statistics New Zealand shows that 47% of disabled people rent compared to 35% of non-disabled people.[2]

Disabled people are also at greater risk of homelessness due to the lack of security around ongoing tenancy and this is exacerbated by the low number of accessible houses not only in Auckland but throughout the country.

However, as this Future Development Plan looks out to 2053, we have an expectation that during this period, central government will (at some point) be persuaded to legislate for housing design standards to focus on universal design, meaning that disabled people as well as everyone else will be able to live in homes that are both accessible and usable across their natural lifespans.

As we will elaborate in the body of our submission, the main challenge to housing accessibility arises from orienting spatial planning away from planning for urban sprawl towards the creation of more compact communities instead.

b.) Transport

[2]Statistics New Zealand. (2018). The disability gap 2018. Retrieved from https://www.stats.govt.nz/infographics/the-disability-gap-2018/#:~:text=Home%20life-,Of%20disabled%20New%20Zealanders%20aged%2015%E2%80%9364%20years%20in%202018,percent%20of%20non%2Ddisabled%20people.

Earlier this year we submitted on the Auckland Council's Future Transport Projects plans. In that submission, we outlined how disabled people are highly reliant on public transport given the significant proportion of disabled people who don't drive.

Nevertheless, provision needs to be made as part of the Auckland Future Development Strategy to accommodate the transport needs of all disabled people and this includes for those who transport themselves via different modes including driving, bussing, walking, cycling, using taxis and trains.

In 2022, Waka Kotahi published independently commissioned research (in which DPA collaborated) entitled *Transport experiences of disabled people in Aotearoa New Zealand*. [3]

This research illustrated the ongoing accessibility challenges faced by disabled people when using public transport. Disabled people's main challenges included, for example, issues around using Total Mobility (TM), the inaccessibility of bus services, lack of footpaths and safe crossing points, and feeling excluded from the planning of sustainable city centres, as well as the disablist attitudes of some transport planners.[4]

Disabled people also have ongoing issues with accessing train and ferry services in Auckland and the need for improved transport accessibility and affordability[5], including for disabled people, will be key to ensuring the success of urban planning efforts going forward to 2053.

When undertaking future transport planning activities, Auckland Council should ensure that TM is a key component for disabled people as this gives the disabled community who are eligible for it the ability to access their community.

[3]Doran, B., Crossland, K., Brown, P., & Stafford, L. (2022). Transport experiences of disabled people in Aotearoa New Zealand (Waka Kotahi NZ Transport Agency research report 690). Retrieved from https://www.nzta.govt.nz/resources/research/reports/690

[4] Kelly-Costello, A. (2023, June 30). Putting a blind-friendly transport system on the agenda. Blind Citizens New Zealand. https://abcnz.org.nz/uncategorized/putting-a-blind-friendly-transport-system-on-the-political-agenda/

[5] Affordability is an issue for many disabled people in Auckland given that the current Total Mobility maximum fare cap is $40, which is hardly sufficient for personal travel across great swathes of the region.

DPA also recommends that the existing maximum fare cap needs to be adjusted annually to keep pace with inflation, so that disabled people can access journeys to both existing and newer communities within the Auckland region.

Recommendation 1: that Auckland Council should ensure that TM is viewed as a key transport component for disabled people in all transport planning activities.

Recommendation 2: that Auckland Council adjusts the TM maximum fare cap annually by the rate of inflation.

c.) Climate change

The disabled community are already being severely hit by the impacts of climate change and are expected to be one of the hardest hit population groups going forward, locally, nationally and internationally.[6]

DPA found that after reaching out to our members in Auckland following the recent weather events that while many disabled people were resilient and had withstood the floods well, others had not as we heard stories about the impact that weather-enforced homelessness had on disabled people, especially given the lack of accessible housing.[7]

DPA welcomes the focus on avoiding hazards, especially those which are climate related, as part of this plan. We recognise that it is clear after the recent flooding events that there are areas which will likely be red zoned as not suitable for building due to natural and geological hazards by either Auckland Council and/or central government following the introduction of new planning legislation.

[6]Schulte, C. (2020, March 28). People With Disabilities Needed in Fight Against Climate Change. Retrieved from https://www.hrw.org/news/2020/05/28/people-disabilities-needed-fight-against-climate-change#:~:text=People%20with%20disabilities%20are%20at,said%20in%20a%20recent%20report.

[7] Shivas, O. (2023, February 4). 'Life or death' for disabled people caught in Auckland floods, improvements needed. *Stuff.* https://www.stuff.co.nz/auckland/local-news/131128910/life-or-death-for-disabled-people-caught-in-auckland-floods-improvements-needed

Some red zoning will likely affect areas which have a flat topography that otherwise makes settling in these areas very attractive to disabled people, especially those with mobility impairments. The fact that formerly suitable areas will become out of bounds for house building and settlement activity or even face managed retreat means that disabled people need to be fully involved in discussions about these possibilities, which we will elaborate on further within this submission.

d.) Infrastructure

DPA believes that accessible community infrastructure needs to be put in place across the board.

For disabled people, this includes infrastructure such as footpaths, roads, parks, rail, bus and ferry services, all of which will support both existing and new communities across Auckland.

We will talk further in this submission about the need to have all infrastructure designed and built to universal design standards.

2.) Auckland's Future Development Strategy – a disability perspective

a.) Focusing growth

While DPA welcomes the development of more compact, accessible communities, there are still several issues needing to be resolved for this to happen successfully, especially for disabled people.

Firstly, there is the need for the Building Code and other associated legislation to change to make the growing number of high-rise apartments and dwellings necessitated by this policy fully accessible and the goal of fully accessible communities possible.

Currently, under the Building Code, builder owners/developers are not legally required to have accessibility features, including lifts, installed in private dwellings (i.e., houses and business premises) if they are less than three floors in height.[8]

In the absence of any changes to the Building Code for even part of the timeframe of this plan, Auckland Council will need to incentivise private, government and non-government organisation developers through capital contributions to build apartments and more compact housing to Lifemark Universal Design (UD) standards, especially in the areas being signalled for infrastructural upgrades. The use of capital contributions will also help offset any additional costs involved.

Recommendation 3: that Auckland Council incentivise the building of more compact, accessible to Lifemark UD standards houses and public buildings through capital contributions.

According to one of DPA's members, more of Auckland's disabled people, as well as their families and whānau, have moved to locations which have cheaper rental properties including Waiuku, Pukekohe, Warkworth, Puhoi, and Helensville over the last 10 years.

The member also related that in their view none of the community infrastructural upgrades proposed in this plan are not based in these locations. For this reason, strategic planning and investment needs to flow to the communities where disabled people are increasingly settling as well as to existing communities.

Secondly, this means the need for Auckland Transport to provide fully accessible transport options including rail, ferries, buses and other on-demand transport services for everyone, including disabled people, both to and from wherever they live within the region. If this is done, then disabled people in the abovementioned and

[8] Pringle, T. (2018, December 1). Going up and down. *Build 169*. https://www.buildmagazine.org.nz/index.php/articles/show/going-up-and-down#:~:text=3%20(which%20differs%20from%20D1,required%20to%20a%20reception%20area

other locations around Auckland will be able to easily access the city and its environs in the future.

Recommendation 4: that strategic planning should include investment in improving accessibility everywhere within the Auckland region.

Recommendation 5: that Auckland Transport ensure that accessible transportation options are prioritised enabling the connection of disabled people with the upgraded centres.

b.) Accessible local centres

DPA supports the concept of having accessible, compact local centres (known as 20-minute cities/towns) where people live in communities where their work, essential services, schools, healthcare, recreational opportunities and retail outlets are based within 20 minutes of where they live.

DPA recognises the importance of building more compact, accessible communities which enable the building of greater social connections and cohesion while simultaneously aiming to reduce carbon emissions through more readily available public transport options leading to the reduction of long commutes.

Disabled people would benefit from having more compact communities given that great numbers of us experience social marginalisation, isolation and loneliness within the more sprawled out communities we presently live in.

However, for more compact communities to work for us housing, transport and infrastructure need to be fully accessible.

DPA believes that the best way to ensure that all infrastructure including housing, public buildings, schools, footpaths and transport systems are fully accessible is that Universal Design Standards (at least to level 5) are fully written into the development strategy so that they are understood by all stakeholders including builders, developers, planners and architects, amongst others.

Recommendation 6: that Council fully incorporate Universal Design Standards (at least to level 5) within the Future Development Strategy to ensure accessibility.

All communities in Auckland should be suitable for every disabled person to live in too, and this includes people with mobility impairments, blind and low vision people, neurodiverse people (i.e., Autistic people), people with psychosocial disabilities/mental distress and Deaf/deaf communities.

This can be achieved through having accessible wayfinding signage in public spaces/places, quiet spaces where people can retreat to in busy areas (which are suitable for neurodiverse people and people experiencing mental distress), accessible bus stops, mobility parking and vehicle drop off areas, appropriate seating where people can sit and rest as well as good lighting and security features.

Building infrastructure to UD standards should support the building of accessible, inclusive communities but more detail needs to be included in the final strategy as to how.

Most importantly, building fully accessible, inclusive communities has to be underpinned by the undertaking of extensive barrier free accessibility audits in areas where infrastructural improvements are being mooted under this strategy.

Recommendation 7: that Auckland Council undertake barrier free audits in areas where infrastructure improvements are planned.

c.) Avoiding hazards (climate related)

DPA acknowledges the need to manage development around the threats posed by climate change and significant natural hazards including earthquake faults and dormant volcanoes.

DPA supports the proposition that known areas which present a natural hazard risk due to natural and climatic risks should be re-assessed to see whether future development is viable.

DPA is also supportive of the idea that where development has already been approved in potentially vulnerable areas that investigation be undertaken into appropriate actions to mitigate the risks that present from this.

We say this as we know of disabled people in the Auckland area who have had to leave accessible housing because of the recent weather events. Our concerns have been further compounded by reports that social housing providers, such as Kainga Ora, could be planning housing developments in flood prone areas, some of which will contain much needed accessible housing.

This means that if new, accessible housing is constructed in high-risk areas, there is the potential for any units to be severely damaged or destroyed, rendering them uninhabitable, perhaps only a short time after first being moved into by disabled people; after having undergone (in many cases) a long wait for them.

DPA would like to see these stressful scenarios for disabled people avoided through good, effective involvement in all aspects of development planning by local communities in the Auckland region under this strategy.

DPA believes that it is inappropriate for land which is deemed to be at high risk from natural hazards including flooding and sea level rise to have new buildings or development on them without full consideration about how the risks to local communities and their residents can be managed.

Recommendation 8: that Auckland Council review the appropriateness of allowing new house and commercial building activity in areas deemed at high risk of damaging flooding or sea level rise.

Post any reviews, there should be managed retreat from areas which are assessed as being prone to a high level of climate related risks that cannot be mitigated, and this includes from things such as damaging flooding or other natural hazard hazards.

In these circumstances, many disabled and older people will need to be transitioned away from high-risk areas to (hopefully) less risky but still accessible ones as part of any managed retreat strategies.

In the medium to long-term, this will require Auckland Council and central government to partner with disabled people and disability organisations as part of community co-design efforts to successfully plan these types of transitions.

Recommendation 9: that Auckland Council partner with disabled people, tangata whaikaha/whānau hauā and disability organisations to plan any managed retreat from existing communities that are at high risk from climate related natural hazards.

d.) Resilient infrastructure

DPA supports the creation of resilient, nature-based infrastructure as one means of providing an active defence against the risks of climate change. Ideas such as gardens, swales, and detention basins are just some of the ones that we agree with.

Undertaking this type of natural infrastructure creation might mitigate the need for managed retreat, meaning that as few people as possible will be impacted by this.

It will also mean that the homes, schools, training establishments and businesses of Auckland will be more protected from future climate change produced events.

Future Development Plan 2023 #8539

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 see attached submission

#8539

CIVILPLAN CONSULTANTS

Submission on the Draft Future Development Strategy 2023

To: Auckland Council

Name of Submitters: [redacted]
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This is a submission on Draft Future Development Strategy 2023 ("the proposal" or "draft FDS").

The submitters (listed above) are owners of land at Upper Orewa Road and Russell Road in Wainui. They are directly affected by the draft FDS's decisions related to the Upper Orewa future urban area.

1. General Submission

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

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

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

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

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

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

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

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

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

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

1.1 Sufficient Development Capacity Assessment

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

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

1.2 Sufficient Development Capacity in Demand in Future Urban Areas

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

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

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

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

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

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

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

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

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

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

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

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

1.3 Role of Private Plan Changes

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

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

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

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

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

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

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

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

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

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

1.4 Implications For Future Urban Zoned Land

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

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

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

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

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

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

1.5 Offsetting Principle

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

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

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

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

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

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

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

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

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

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

1.6 Infrastructure Integration

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

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

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

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

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

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

1.7 Infrastructure Funding

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

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

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

1.8 The Impact of Uncertainty

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

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

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

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

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

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

2. Site-Specific Submission

The land to which this submission specifically relates to is henceforth referred to as the 'Upper Orewa land'. This land is generally those properties currently within the Future Urban Zone under the AUP that are to the west of the Northern Motorway and to the north of the Orewa River, but excluding the "Ara Hills" land (also known as the "Hall Farm" land) that is currently being developed in accordance with a resource consent obtained in 2017 This land is indicated in Figure 1, below.

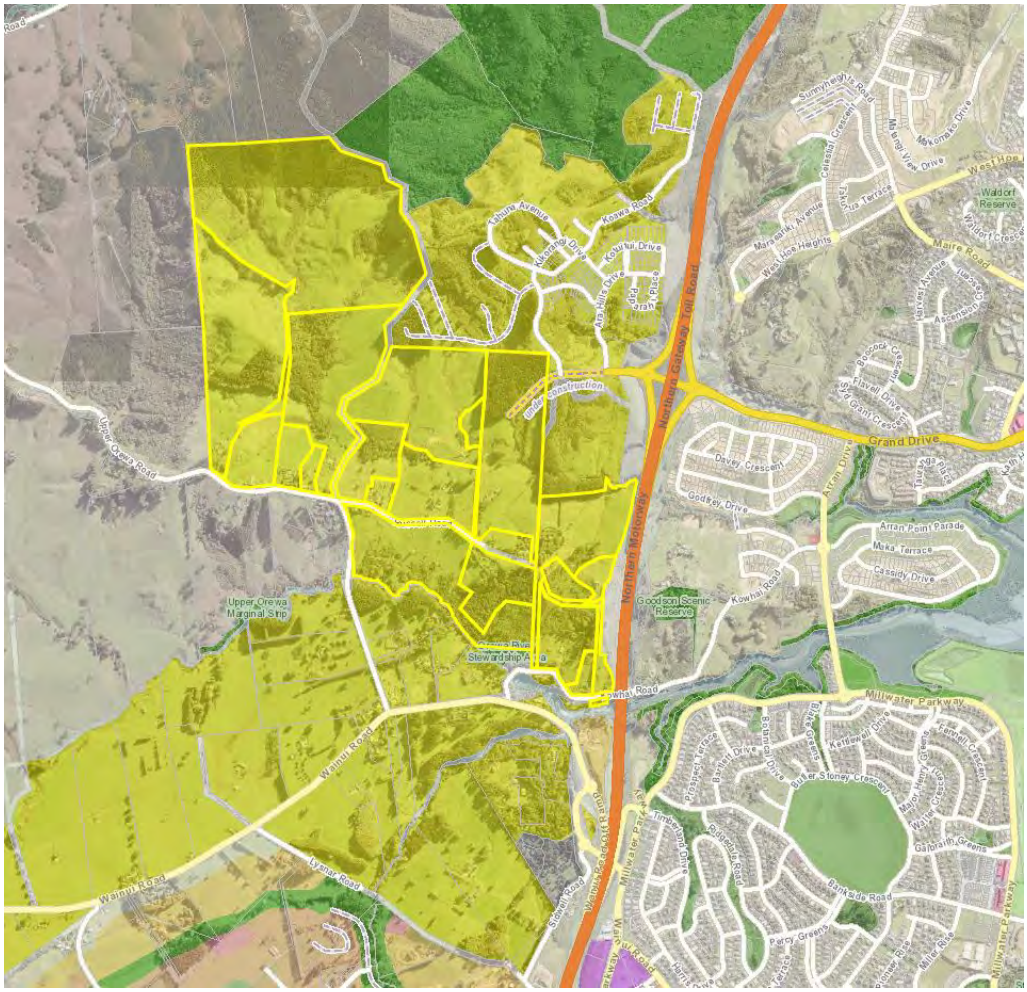


Figure 1: Location and Extent of the Upper Orewa Land

The Upper Orewa land and the Ara Hills land together form a distinct area that is bordered by the following defensible boundaries:

- To the north and west, areas of native bush that have been identified in the AUP as Significant Ecological Areas. This includes the Nukumea Scenic Reserve.
- To the south, the ridgeline that aligns with Upper Orewa Road and then either the ridgeline that aligns with Russell Road or the Orewa River (noting that some of the area between these latter features is identified in the AUP as Significant Ecological Areas) – refer to Figure 2, below.

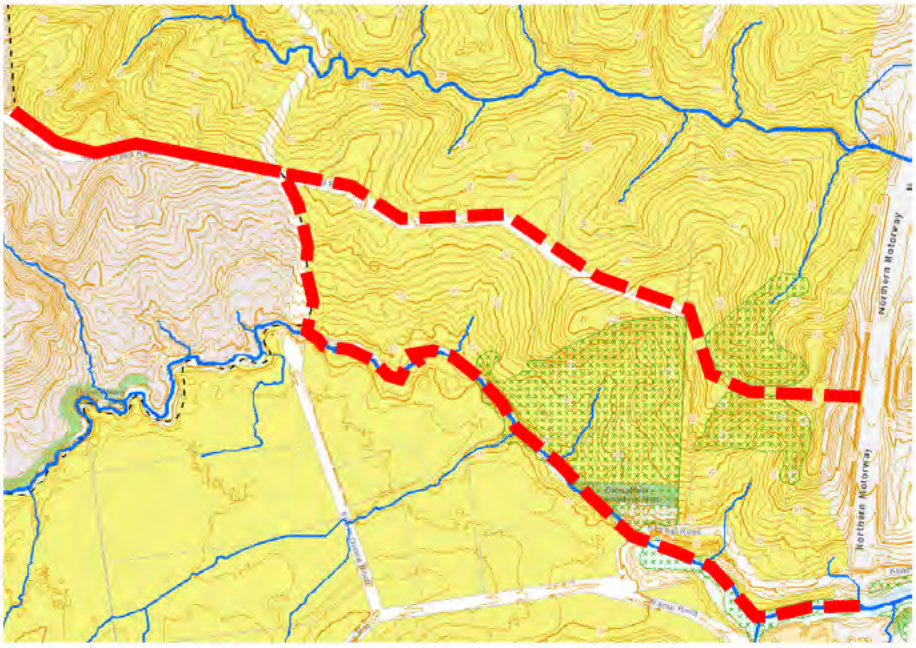


Figure 2: Defensible Southern Boundary Options for the Upper Orewa land

- To the east, the Northern Motorway.

The Future Urban Land Supply ('FULSS') and the draft FDS have both included the Upper Orewa land as part of the "Upper Orewa" development area. In both instances, the Upper Orewa development area extends further south to include all Future Urban zoned land north of the Weiti Precinct, with the Ara Hills land being identified as the "Upper Orewa Resource Consent Area". While this submission primarily relates to the Upper Orewa land, it could similarly apply to the Upper Orewa development area as a whole.

The FULSS identified the Upper Orewa development area to be development ready between 2033 and 2037, alongside the remainder of the Wainui East, Silverdale and Dairy Flat. However, under the draft FDS, the Upper Orewa development area is recommended for further investigation and not planned to support development before 2050+. The same conclusion has been made for the Wainui East, Silverdale and Dairy Flat areas. Appendix Page 33 of the draft FDS specifies the reasons that the Upper Orewa area is recommended for further investigation, which relate to infrastructure, urban form, emissions/VKT reduction and natural hazards.

It is noted that these matters appear to have been considered by Council on the basis that all of the land currently within the Upper Orewa development area would provide for medium or high-density residential development. While this approach is understood in light of the Medium Density Residential Standards requirements now included in the Resource Management Act 1991, it fails to recognise that there is an additional urban residential zone that would be available to apply when rezoning Future Urban zoned sites that is not subject to the MDRS: the Large Lot zone.

The AUP zone summary for Large Lot, which is unaffected by Plan Change 78, states that the zone is to apply on the periphery of urban areas to address one or more of the following factors:

- Landscape qualities of an area;
- Land not suited to conventional residential subdivision due to a lack of reticulated services; or
- Physical limitations such as topography or natural hazards.

Therefore, land developed in accordance with the Large Lot zone will have fewer demands on infrastructure and result in fewer natural hazard risks. Given the topography of the Upper Orewa land and the proximity of sensitive ecological areas, the Large Lot zone may be found, at the time that structure planning is undertaken, to be the most appropriate zone for part of this land.

With this in mind, the relevance of the reasons provided on Appendix Page 33 of the draft FDS as to why development at Upper Orewa should be subject to further investigation is considered in turn:

- <u>Transport infrastructure</u>:

  The draft FDS identifies that rapid transit, frequent transit routes, key arterials and provision of active modes are required to support development in the Upper Orewa area and achieve strategic outcomes.

  Supporting Growth has recently consulted on and determined the preferred strategic transport requirements for the North Auckland Future Urban zones. For the Upper Orewa land, the only identified requirement is an arterial road between Grand Drive and Upper Orewa Road. The first section of this road is partly being delivered as part of the Ara Hills development. No public transport or active mode projects were identified within the Upper Orewa land.

  It is therefore considered that development of the Upper Orewa land is reliant on a single major transport project. As is already occurring with Ara Hills, subdivision of the Upper Orewa land can provide for this road corridor as necessary, given that the provision of road access would be required for such development. Some urban development may also be able to proceed prior to the full completion of this road, with a staged rollout based on traffic demands – with the specific details of this to be determined through a future plan change process.

- Wastewater infrastructure:

  The draft FDS specifies that a Wastewater Treatment Plant upgrade is required to support development in the Upper Orewa area.

  However, this infrastructure may not be necessary to service Large Lot development if structure planning determines this to be the most appropriate land use pattern for part of the Upper Orewa land.

  Otherwise, upgrades to Army Bay Wastewater Treatment Plant are already identified as necessary to facilitate urban development in Silverdale West, currently anticipated to occur in Decades Two and Three (2033+). The submitters consider that upgrades to this plant should provide capacity for the full potential development scenario in its catchment (including the Upper Orewa land) to avoid ongoing and incremental upgrades in the future.

- Urban form and business land retention:

  The draft FDS specifies that further consideration is needed to understand the relationship of Upper Orewa to the rest of the future urban area and nearby existing urban area and the impact any changes might have on planned infrastructure such as rapid transit.

  This appears to be a matter more appropriate for a structure planning exercise, rather than a matter that should be considered by the draft FDS or when determining to zone land Future Urban (or not).

  If looking only at the urban form implications of removing the Future Urban zone from the Upper Orewa area, this is considered to only result in adverse effects, given that:

  - Urban development of the Ara Hills land in accordance with its resource consent will continue regardless of the site's zoning.
  - The eastern and southern boundaries of the Ara Hills land do not follow any obvious natural or physical features that would provide an appropriate defensible boundary.
  - The urbanised Ara Hills land will be disconnected from the urbanisation occurring within the Wainui Precinct – a gap that the existing Future Urban zone intends to close.

  Because of this, the existing Future Urban zones are considered to be a significantly more defensible Rural Urban Boundary than an alternative RUB around the Ara Hills land and the Wainui Precinct.

- Emissions/VKT reduction:

  The draft FDS considers that there is the potential for the Upper Orewa area to result in higher vehicle kilometres travelled and CO_2 emissions than other future urban areas due to its relative distance from high quality public transport, a wide range of jobs, education and other services. In relation to this:

  - The Ara Hills development has been designed to accommodate a bus station adjacent to the Grand Drive motorway interchange (as per the conditions of their resource consent).
  - It is considered feasible for feeder bus services to be established to provide connections to the rapid transit network currently available at Silverdale and/or proposed at Milldale.
  - The land is in relatively close proximity to the Orewa town centre (3 km), the emerging Milldale local centre (3 km), business land at Millwater (2 km), business land at Silverdale (4 km) and future business land at Silverdale West (3 km), which would provide for the majority of residents' needs, including for jobs and education.
  - Should a Large Lot zoning be determined to be the most appropriate land use for at least part of the Upper Orewa land, the number of vehicle trips generated would be (compared to a Mixed Housing Urban zone scenario) significantly lower than what is currently assumed.

  In addition, the anticipated increased use of private vehicles that do not rely on carbon-emitting fuels will result in a reduced correlation between vehicle kilometres travelled and CO_2 emissions. Should the Upper Orewa land not be developed until at least 2050 (as proposed by the draft FDS) or even 2030 (as per the relief sought), the majority of new vehicles are expected to be electrically powered. Therefore, the potential for future urban development to increase vehicle kilometres travelled should not be conclusive that CO_2 emissions will similarly increase.

- Natural hazards:

  The draft FDS identifies "some" of the future urban area is exposed to flooding and coastal hazard risks, and also identifies moderate-risk slope instability in the north-western portion.

  Within the Upper Orewa land, the land identified on Auckland Council's Geomaps as a being subject to the 1% flood plain is predominantly the land along stream corridors and their associated gullies, with no existing or potential widespread flood plains. Coastal hazards are only in relation to a small area adjacent to the Orewa Stream that are unlikely to be developed, due to existing road corridors or identified Significant Ecological Areas. Unlike the existing Orewa urban area, the Upper Orewa land would not be at risk of tsunami. Therefore, the overwhelming majority of the developable land within the Upper Orewa area should be able to provide for urban development with limited risks from these natural hazards.

Given the topography of the land, it is accepted that there is the potential for slope instability risks in the Upper Orewa land. However, the Ara Hills development has occurred on similar topography and demonstrates that it is likely to be feasible to provide for medium density housing at this land. Where slope stability risks in specific areas of the Upper Orewa land make higher densities inappropriate, the Large Lot zone is an urban zone that can be applied. The actual risks and detailed land use response to those areas subject to such risks would be determined through a structure planning process, not through a Future Development Strategy.

Overall, the submitters consider there to be insufficient grounds for Council to identify the Upper Orewa FUZ land as an area where further investigation is required to potentially remove the current Future Urban zoning under the AUP, and for it to not provide for long term development capacity in the Auckland region.

In addition, the majority of these matters were already considered during the determination on the Proposed Auckland Unitary Plan. The Upper Orewa land was notified to be within the Countryside Living zone or Rural Production zone, but submissions sought that the land be subject to the Future Urban Zone instead. The recommendation of the Independent Hearings Panel, which was adopted as a decision by Auckland Council, to apply land Future Urban zone was on the basis that locating the Rural Urban Boundary in its current position met the relevant criteria in the regional policy statement and was consistent with its best practice approaches. The submitters consider that there is insufficient rationale for Auckland Council to now be putting forward a proposal that is inconsistent with that earlier determination.

3. Relief Sought

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

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

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

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

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

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

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

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

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

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

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

j) That the Upper Orewa area have the "subject to further investigation" notation removed and be identified as medium or long term future area (2030+ or 2035+), to be consistent with the FULSS).

Signature: [redacted].....

Aaron Grey – Associate, CivilPlan Consultants Ltd
on behalf of Alan, Dion and Melanie Mayes, Rod Clarke, and Wainui Heights Limited

Date: 31 July 2023

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CIVILPLAN CONSULTANTS

SUFFICIENT DEVELOPMENT CAPACITY IN AUCKLAND

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

1. Introduction

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

2. Requirements for Providing Sufficient Development Capacity

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

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

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

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

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

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

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

3. Plan-enabled Capacity

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

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

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

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

4. Infrastructure-Ready Capacity

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

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

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

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

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

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

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

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

5. Feasible Capacity

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

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

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

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

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

6. Capacity That is Reasonably Expected to be Realised

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

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

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

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

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

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

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

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

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

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

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

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

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

6.1 Case Study – Pakuranga THAB

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



Figure 1: Pakuranga THAB Case Study Area

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

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

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

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

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

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

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

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

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

Table 1: Actual Development Compared to Maximum Capacity

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

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

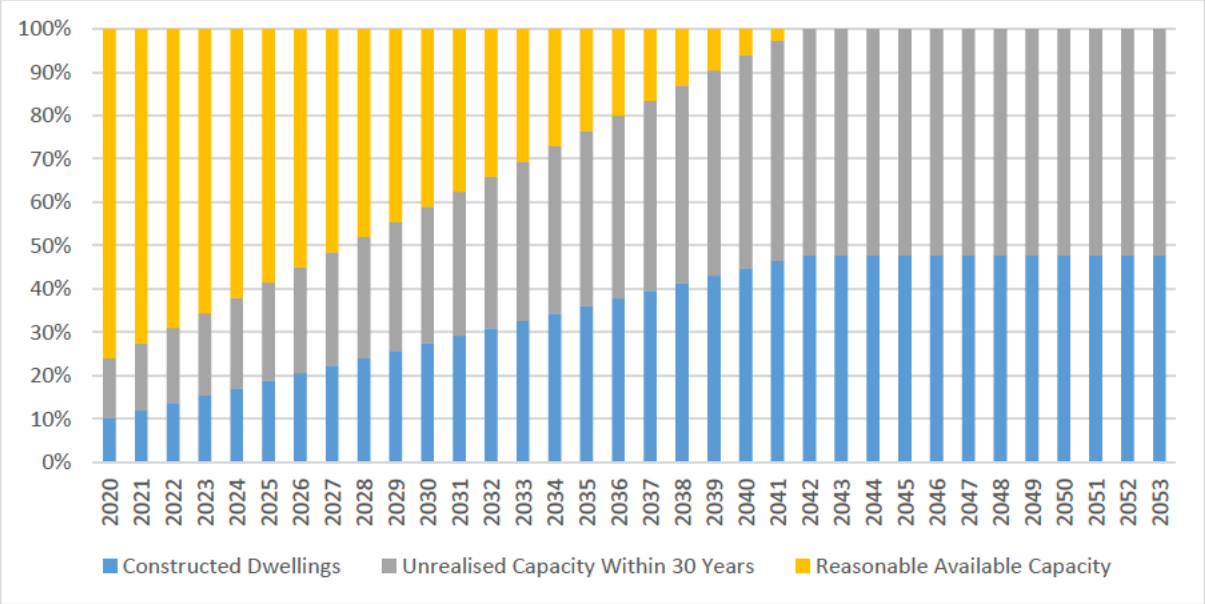
Assuming that a constant uptake of development capacity occurs in the future, a net increase of 20 dwellings per year within this case study area can be confirmed. However, a net increase in the number of dwellings would coincide with an increase in capacity that would be unrealised within the next 30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

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

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

This is illustrated on Chart 1, below.

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



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

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

7. Conclusion

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

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

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

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

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Table 2:
Sites within the Pakuranga THAB Case Study Area

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

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

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

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

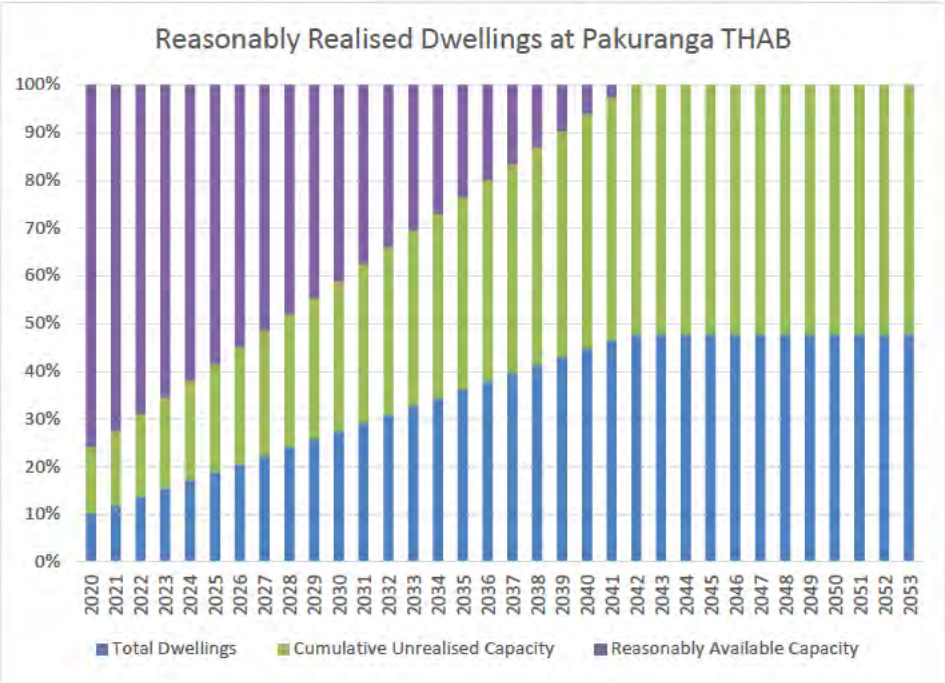
* Maximum Capacity Calculation: Site area times 50% building coverage times 4 storeys, all divided by 120 m² area per dwelling, rounded down to nearest whole number

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

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

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

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



Future Development Plan 2023 #8541

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

#8541

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 land with which they have an interest and responds to the provisions of the FDS in both 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:	Red Rhino Consultants Limited and Airport Rent A Car Limited
Property Interest:	[redacted] Glenvar Ridge Road, Long Bay

Address for Service

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

Property Details

The submitter has a particular interest in the land at [redacted] Glenvar Ridge Road, Long Bay. Refer to the aerial photograph in Figure 1 below.

The land comprises approximately 20-ha of greenfield land. The land is situated on the periphery of the existing Long Bay urban area currently undergoing conversion from low-density to medium density, and in some areas, high density, housing. The land has a southern boundary frontage to Glenvar Ridge Road and is characterised by undulating topography sloping northwards towards Vaughans stream.

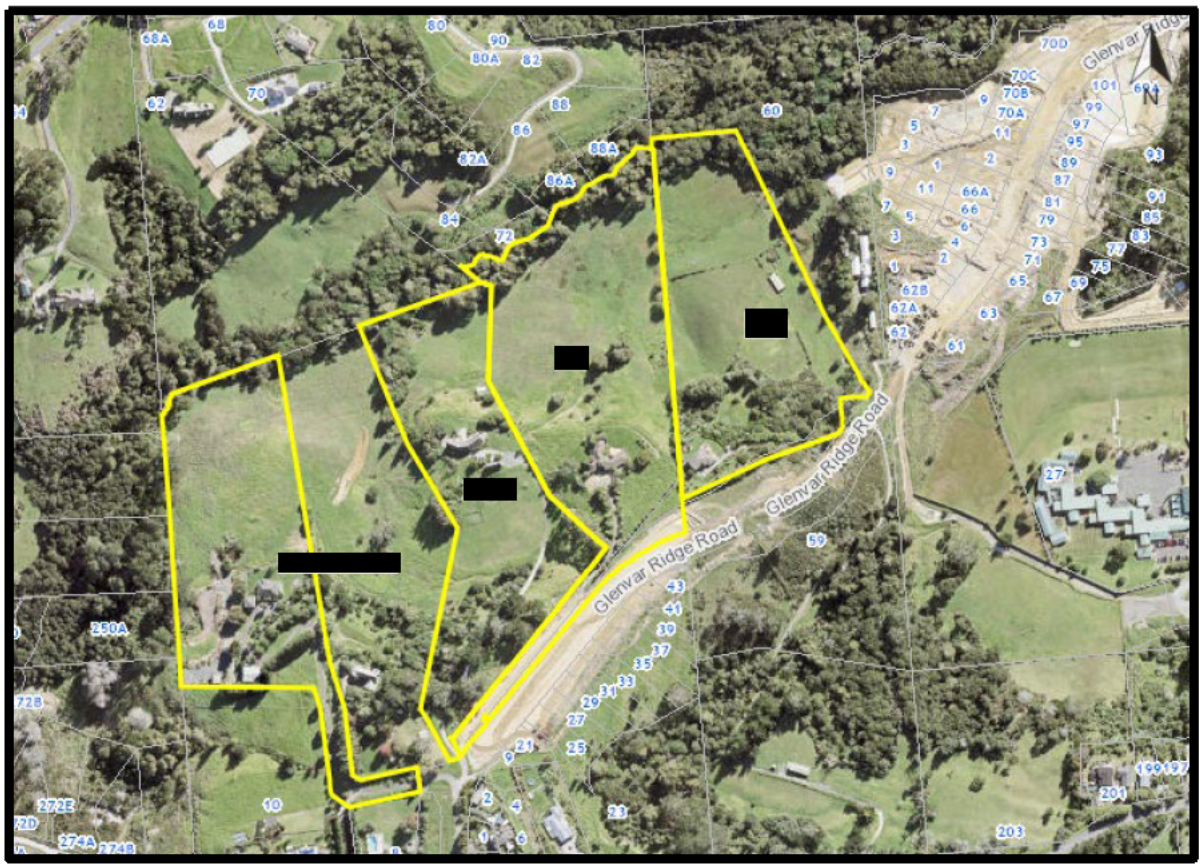


Figure 1 – Aerial image of 14, 20, 32, and 58 Glenvar Ridge Road, Long Bay (Auckland Council GeoMaps, 31/07/23)

There are several precincts applying to Long Bay in the Auckland Unitary Plan- Operative in Part (AUP-OP). The Long Bay Precincts have enabled development of a new community on greenfield land in an integrated and sustainable way that protects and enhances the natural environment – both terrestrial and marine.

Long Bay Sub-Precincts A, B and D apply to the land; Sub-Precincts A and B cover the Residential Large Lot Residential Zone portion of the land while Sub-Precinct D covers the Residential – Single House Zone portion of the land. The land in question is predominately Precincts A and B – Residential Large Lot Residential Zone.

The AUP-OP describes Sub-Precinct A as Large Lot Residential, Sub-Precinct B as Rural Residential and Sub-Precinct D as Suburban neighbouring – north of Vaughans Stream (Steam Protection A Area). Refer to AUP-OP zoning map overleaf.

Sub-Precinct B provides for Rural Residential living. Activity Table I519.4.3 provides for pastoral farming and horticulture as permitted activities within Sub-Precinct A and B. These activities are incompatible with the current use and development of the surrounding land which is predominantly utilised for lifestyle use. This is a completely inefficient use of this land which is ideally located, and physically able, to be developed for more intensive residential purposes.

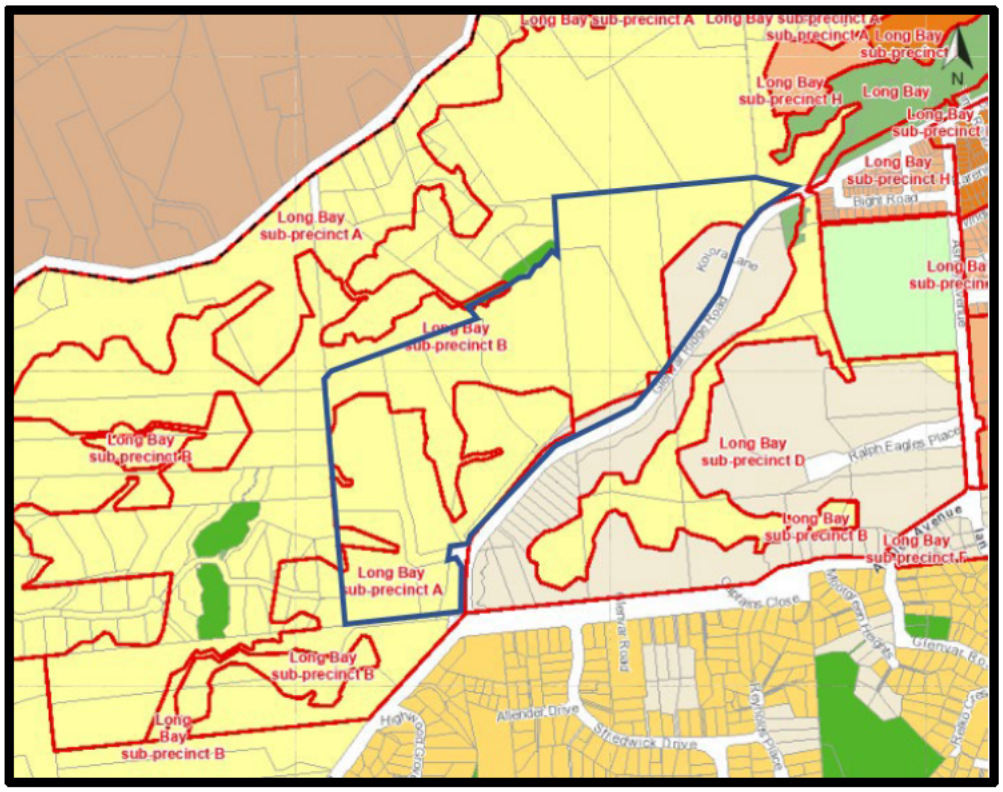


Figure 2 - Map showing AUP-OP zoning of Glenvar Ridge Road, Long Bay
(Auckland Council AUP-OP Maps, 31.07.23)

Walkability from the land to Long Bay Local Centre is near ideal. Walking is facilitated by new, wide footpaths that span the length of Glenvar Ridge Road on both sides, three existing pedestrian crossings, flat topography along the urbanised section of the road, and the grass berm and landscaped setback of the footpath from the road that provides for pedestrian safety. Further to this, the area has high amenity value in terms of street landscaping, a variety of built form, coastal views, and ease of access to reserves and open spaces.

For the able-bodied, the land is located within walking distance to the local centre, Long Bay Primary, Long Bay College, the sports fields at Ashley Reserve, Long Bay Medical Centre, New World, Long Bay Regional Park, and Long Bay Beach. Long Bay is a 30-minute drive north of the Auckland CBD, 10km north-east of Albany and 18km north of Takapuna, and within easy reach of the main public transport hubs of the North Shore.

There are also public transport options, and an extensive reserve network at Long Bay in the immediate vicinity.

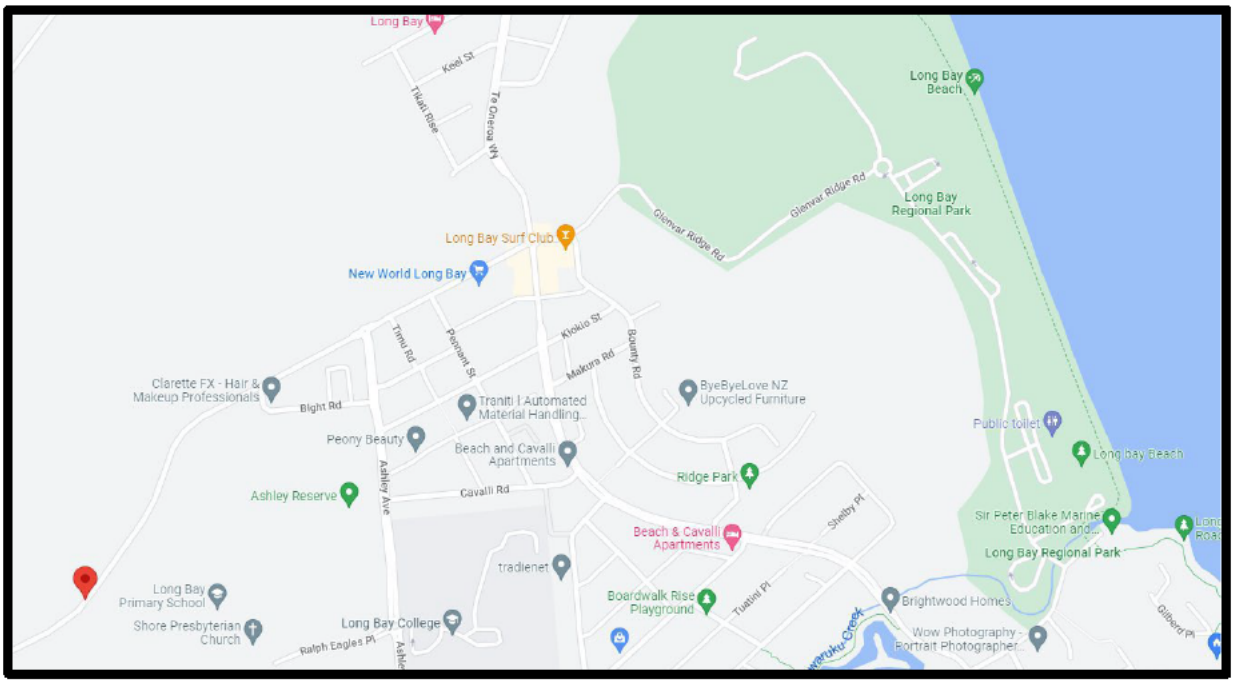


Figure 3: Locational Map (Source: Google Maps)

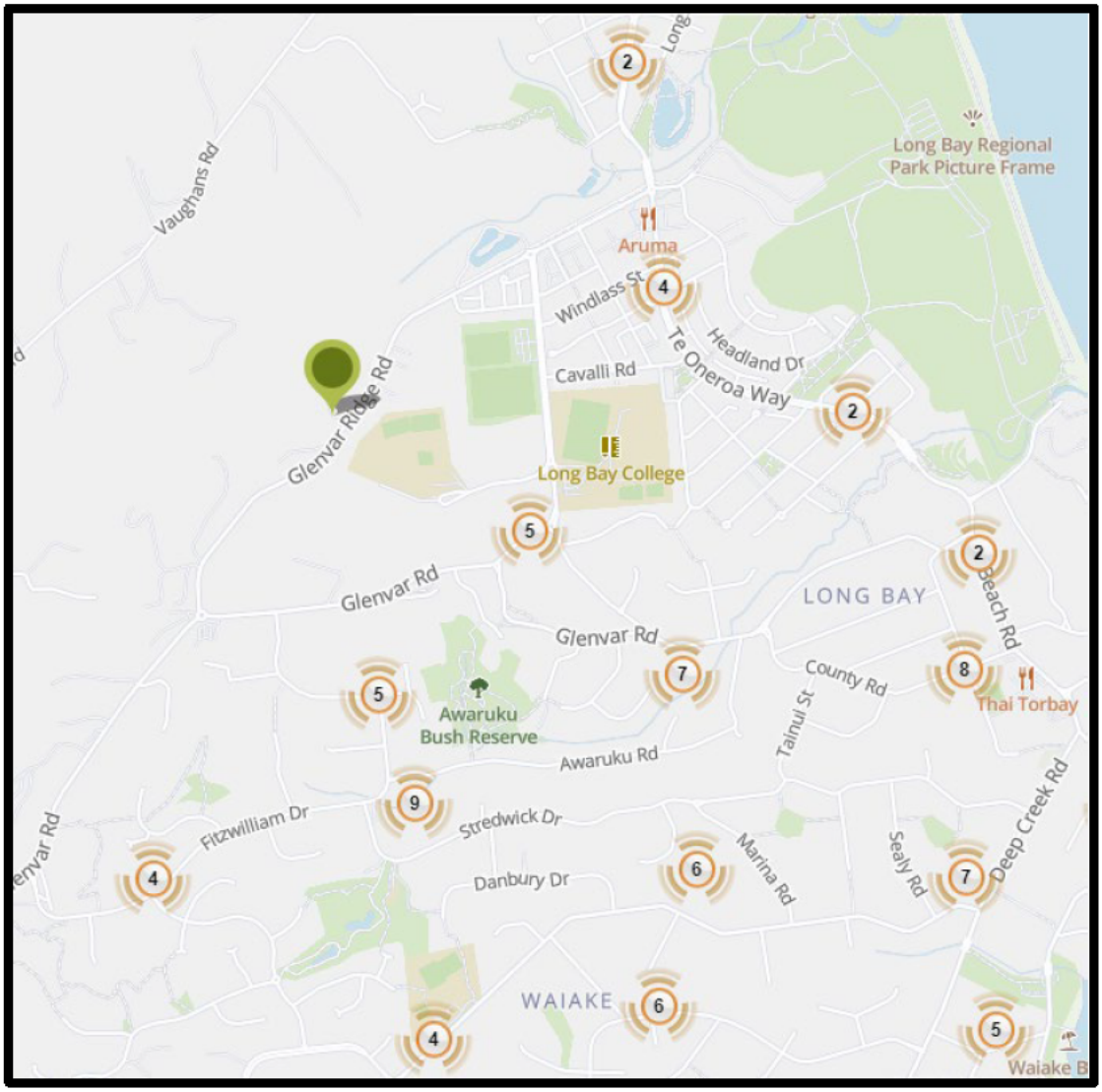


Figure 4: Nearby Bus Stops (number of bus stops at location indicated by number inside circle) (Source: https://at.govt.nz/bus-train-ferry/timetables/find-my-stop-or-station-on-a-map/)

The land to the immediate east of the sites is owned by Templeton Long Bay North Limited. This land is currently under development for more intensive residential forms. The land adjacent to Glenvar Ridge Road provides an opportunity for land to accommodate additional residential density without compromising Rural – Countryside Living zoned land further to the north on the other side of Vaughans Stream.

This land presents a significant opportunity to provide for more homes within the Long Bay catchment that are within walking distance to the local centre. 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 land is not subject to flooding or other natural hazards and is able to be connected to existing infrastructure.

Given advice from experts about the ability to physically develop the land, including adjoining parcels of land identified in blue in Figure 2 above, for higher density residential development the submitter is in the process of preparing a private plan change to rezone the land within Figure 2 as Residential – Mixed Housing Urban. Auckland Council are aware of the proposed plan change. A meeting was held with Council officers to discuss the proposal in March 2022.

Auckland Council's Intensification Plan Change 78 has taken a blanket approach to exclude Residential- Large Lot zoned sites from the application of the MDRS. This means that the subject land was excluded by Plan Change 78 with no consideration given to whether is residential development potential should be intensified to assist with the delivery of much-needed housing supply

Given the lands unique split-zoning characteristics, greenfield development potential and proximity to an existing local centre, makes mixed housing urban zoning and related residential development a better, more efficient outcome for the land than the existing zoning pattern. The submitter lodged a submission to Plan Change 78 seeking that the medium density residential standards (delivered via rezoning of land to Residential- Mixed Housing Urban) be applied to the subject land and some adjacent land. A copy of this submission is included within Attachment 1.

The approach taken by Plan Change 78 seems to be in direct conflict with the Future Development Strategy which recommends intensification within existing urban areas, given that the submitters land falls within an existing urban area but is proposed to be retained as Residential- Large Lot

Restricting the development opportunities on this large undeveloped residential land that is within close proximity to the Long Bay Village does not align with the purpose of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 or Policy 3 of the National Policy Statement for Urban Development (NPS-UD). The opportunities should be recognised within the FDS.

Future Development Strategy - Long Bay

The land is identified as 'Already Living Zoned' in the FDS. See Figure 5 below:

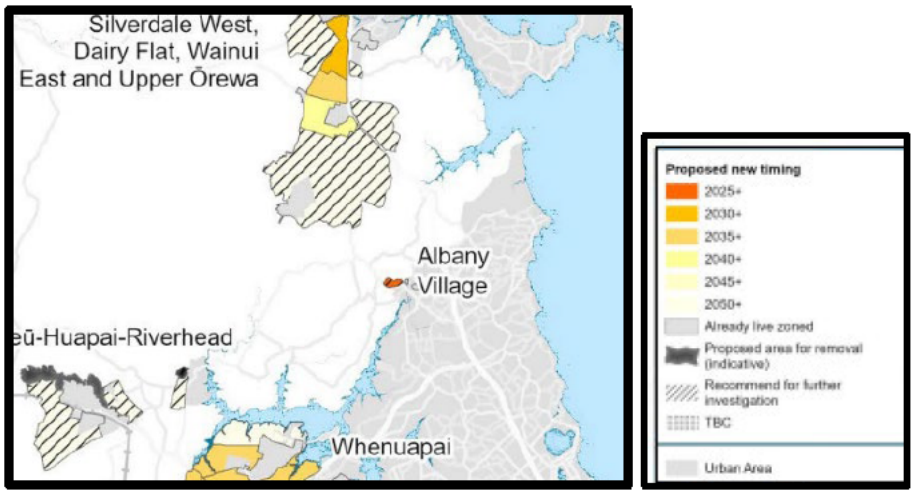


Figure 5 – Proposed new timing of Development (Auckland Council draft FDS)

The FDS does not go as far as to identify any specific existing urban areas which could be intensified; it should. One would presume this matter would have been considered and addressed by Plan Change 78; however in the instance of Long Bay this has been excluded from consideration under Plan Change 78.

Section 2.5 of the FDS sets of the principles for growth and change. These principles are stated as follows:

- *Principle 1: Support greenhouse gas emission reduction*
  - *Principle 1(a): Intensify the existing urban areas and limit further urban expansion*
  - *Principle 1(b): Strengthen accessible, walkable and mixed-use neighbourhoods*
  - *Principle 1(c): Bring jobs and homes closer together*
- *Principle 2: Adapt to the impacts of climate change*
  - *Principle 2(a): Avoid further growth in areas exposed to hazards and promote resilient design solutions*
  - *Principle 2(b): Prioritise integrated, nature-based, regenerative and resilient infrastructure*
  - *Principle 2(c): Support communities to develop appropriate adaptation responses in high-risk areas*
- *Principle 3: Make efficient and equitable infrastructure investments*
  - *Principle 3(a): Take a regional view to infrastructure investment and costs*
  - *Principle 3(b): Make the best use of existing infrastructure*
  - *Principle 3(c): Make investment decisions that deliver on multiple outcomes*
- *Principle 4: Protect and restore the natural environment*
  - *Principle 4(a): Protect ecosystems and integrate the natural and built environment*
  - *Principle 4(b): Restore and connect ecosystems*
- *Principle 5: Enable sufficient capacity for growth in the right place and at the right time*
  - *Principle 5(a): Direction for where and when growth is appropriate*
  - *Principle 5(b): Prioritise areas for growth and investment*
  - *Principle 5(c): Enable enough housing and business capacity to meet future needs*

Intensification of the subject land at Long Bay would meet all of the above principles yet it has been excluded from intensification by PC78. With respect to the above it is noted that:

- The land is close to all local amenities and public transport thus meeting Principle 1.
- The land is not subject to flooding; in any case such matters are appropriately controlled by the existing rules of the AUP-OP thus meeting Principle 2.
- Development of the subject land is able to utilize existing wastewater, water and stormwater infrastructure therefore Principle 3 is met.
- There are significant natural areas on the land which would be vested as an esplanade reserve when the land is developed thus meeting Principle 4.
- Further houses at Long Bay would assist with Principle 5.

Appendix 1 of the FDS contains five maps each showing the extent of the different groups of constraints to development:

- Natural hazards
- Natural Environment
- Natural Heritage
- Highly Productive Land
- Cultural Heritage

The lighter shaded areas represent less constrained areas in the region. The submitters land appears as less constrained on all five constraint maps in Appendix 1.

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, as a minimum to the urban environments of Tier 1 and 2 Local Authorities, and can apply to a wider area.

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.

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 intensification of the subject land will contribute to a well-functioning urban environment through the provision of additional housing supply and choice within proximity to the Long Bay centre, open space areas and transport routes.

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?

Intensification of the subject land meets all of the above.

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?

Intensification of the subject land meets all of the above.

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?

The subject land is not subject to natural hazards that would impede its development.

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?

Development of the subject land would be able to meet all of the above.

Conclusions and Outcomes Sought

The submitter seeks that the subject land area is specifically identified as an area for intensification under the FDS and that this is captured within Appendix 12: Implementation Actions, namely changes to the Auckland Unitary Plan.

The submitter seeks 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, Red Rhino Consultants Limited and Airport Rent A Car Limited wishes to be heard in support of its submission.

Yours sincerely



The Planning Collective Limited
Ph: 021 382 000
Email: diana@thepc.co.nz

Attachments:
1 – Submission to Plan Change 78, 79 and 80

Attachment 1:

Submission to Plan Change 78, 79 and 80

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: Red Rhino Limited and Airport Rent A Car Limited - owners of [redacted] Ridge Road, Long Bay

Red Rhino Limited and Airport Rent A Car Limited could not gain an advantage in trade competition through this submission.

This submission is made on behalf of Red Rhino Limited and Airport Rent A Car Limited to Auckland Council on the Proposed Plan Change 78: Intensification, Proposed Plan Change 79: Transport 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:

Plan Change 78

- The retention of the Residential – Large Lot zone applying to the land. The submission seeks that the Residential – Mixed Housing Urban, with no qualifying matters, be applied to the land identified in Figure 1 overleaf, namely [redacted] Glenvar Ridge Road, Long Bay, (referred to as 'the land' from here on in).
- Any other provisions required to achieve the outcomes sought in the submission.

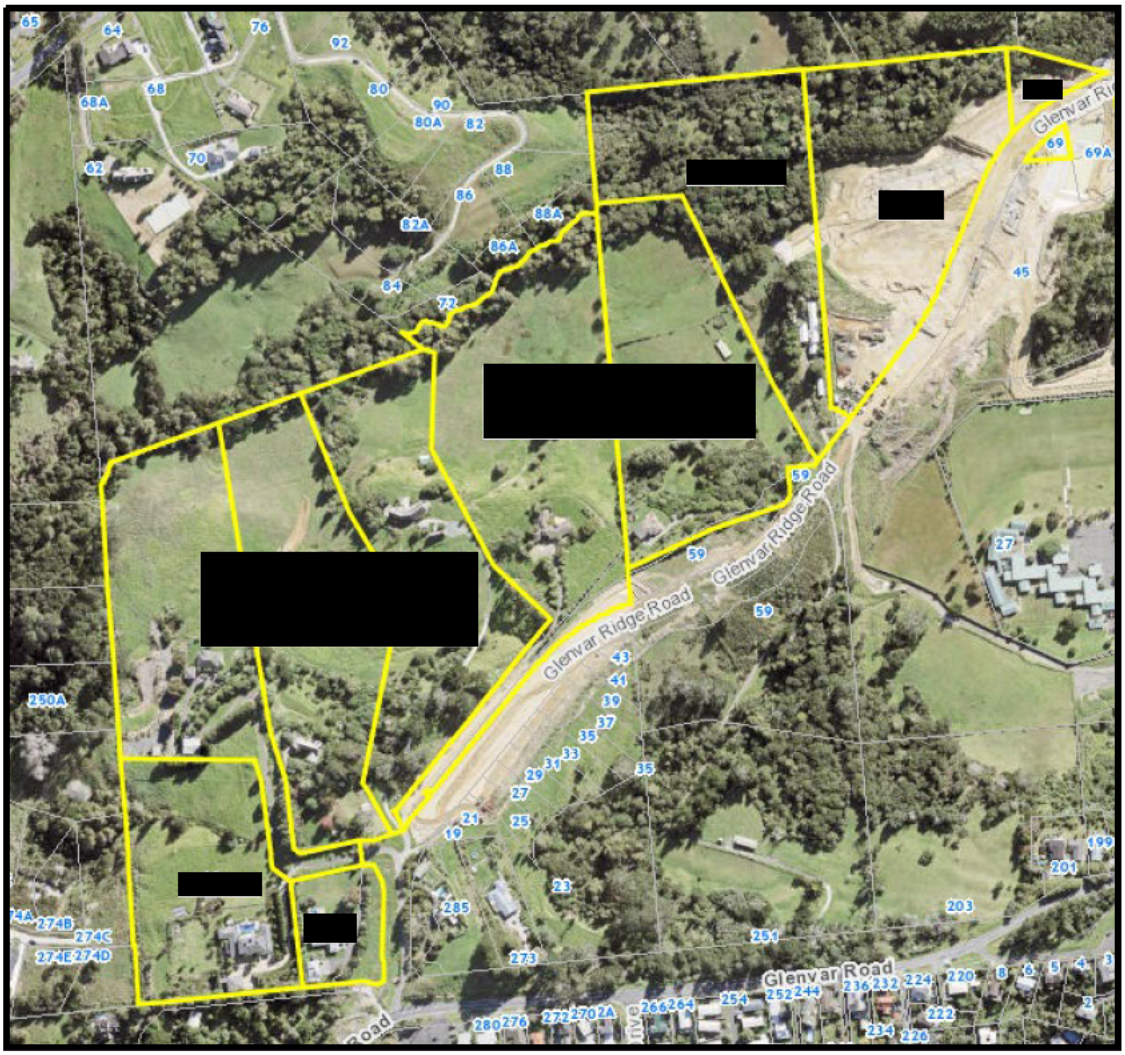


Figure 1: Aerial image of sites suitable for rezoning (Source: Auckland Council GeoMaps)

Plan Change 79

- Provisions relating to pedestrian and cycle access, EV charging and lighting and access to rear sites.

Plan Change 80

- B2.2
- B2.3.1
- B2.3.2 (1) (g) and (h)
- B2.4.1
- 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 and reject references to limiting intensification.
- Any other provisions required to achieve the outcomes sought in the submission.

Scope of the Submission

Section 77F of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 notes that urban environment means:

> *"any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people."*

Section 77G (1) of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 outlines that *every relevant residential zone of a specified territorial authority must have the MDRS incorporated into that Zone.* The definition of Residential Zone within the Act 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 subject sites are zoned Residential – Single House and Residential – Large Lot under the Auckland Unitary Plan – Operative in Part (AUP-OP). Refer to **Attachment 1** for a copy of the AUP-OP planning maps.

PC78 has rezoned the AUP-OP Residential – Single House zone portion of the sites to Medium Density Residential zone; however, it has retained the Residential Large Lot Zone over those portions of the sites (most of the land) which were identified as Residential Large Lot zone under the AUP-OP. While PC78 has rezoned the AUP-OP Residential – Single House zone portions of the sites to Residential – Mixed Housing Urban the precinct qualifying matter reduces this zoning to the new Residential – Low Density Residential zone.

While not required to apply the MDRS provisions under section 77G(1) under section 77G(4), Council may create new residential zones or amend existing residential zones.
The Residential – Large Lot zone is an existing residential zone as per the National Planning Standards. Auckland Council therefore has scope to consider the appropriate residential zone that should be applied to the sites as part of PC78.

Auckland Council has identified that PC 78 applies to the relevant land. This can be seen from the PC78 viewer which shows the land as being subject to zoning under PC 78:

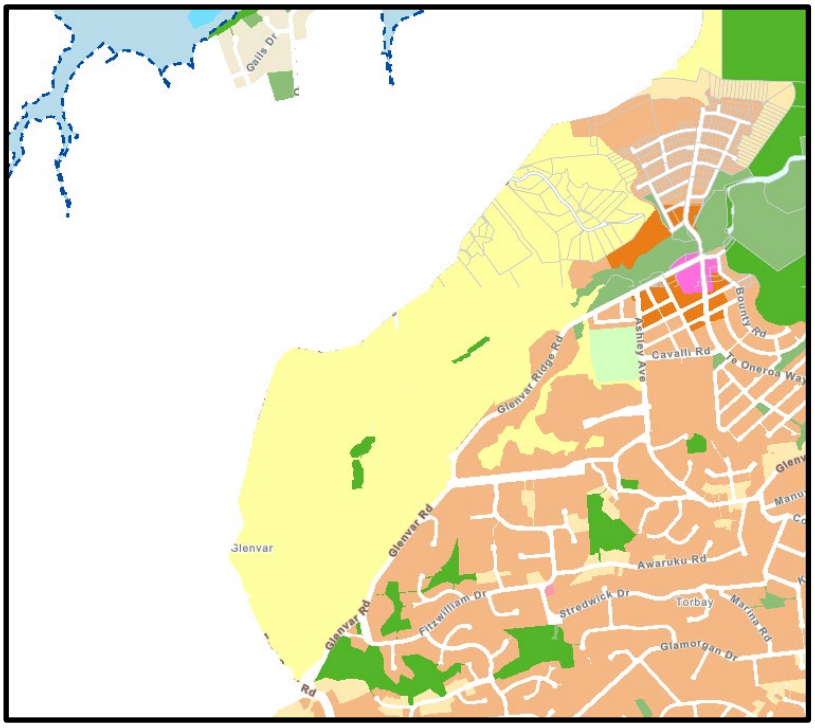


Figure 2: Subject site inclusion in PC78 (Source: PC78 Map Viewer)

By contrast, the viewer clearly shows land that is not within the scope of PC78 as "white". For example, see Scott Point which is excluded from PC 78 and land to the south of the Upper Harbour Motorway which is also excluded from PC 78 because it is outside the Urban Environment.

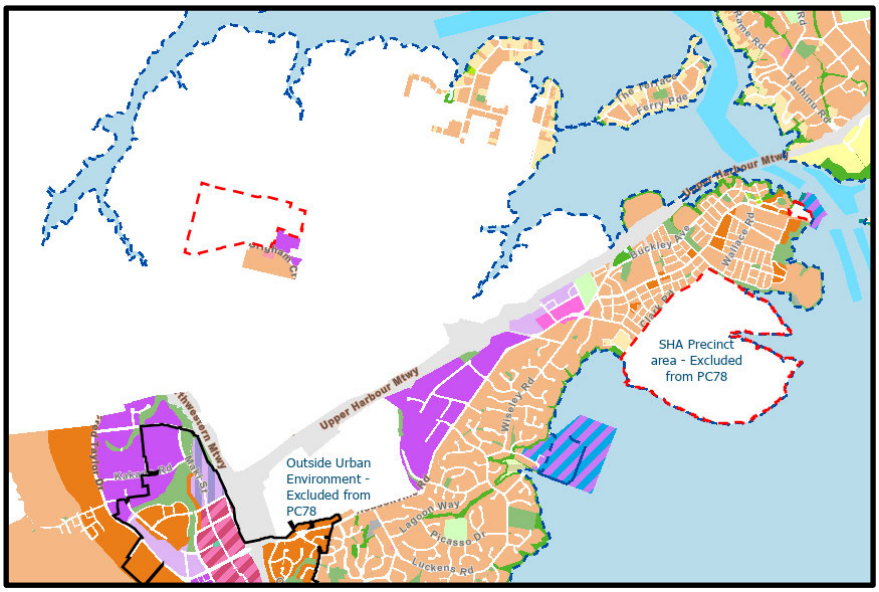


Figure 3: PC78 Maps identifying areas AC consider to be out of scope (Source: PC78 Map Viewer)

Reasons for Submission

Strategic Direction

The NPS provides a clear and strong direction for intensification and maximisation of zoned opportunities in areas where there is high demand for housing.

> **"2.1 Objectives**
>
> Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
>
> Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.
>
> Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:
> (a) the area is in or near a centre zone or other area with many employment opportunities
> (b) the area is well-serviced by existing or planned public transport
> (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment."

As is demonstrated by the following analysis and the sale prices for houses in Long Bay – there is extremely high demand for housing in Long Bay.

Site and Surrounding Area

The Long Bay Precinct has enabled development of a new community on greenfield land in an integrated and sustainable way that protects and enhances the natural environment – both terrestrial and marine.

The land comprises approximately 20-ha of greenfield land. The land is situated on the periphery of the existing Long Bay urban area currently undergoing conversion from low-density to medium density, and in some areas, high density, housing. The land has a southern boundary frontage to Glenvar Ridge Road and is characterised by undulating topography sloping northwards towards Vaughans stream.

Walkability from the land to Long Bay Local Centre is near ideal. Walking is facilitated by new, wide footpaths that span the length of Glenvar Ridge Road on both sides, three existing pedestrian crossings, flat topography along the urbanised section of the road, and the grass berm and landscaped setback of the footpath from the road that provides for pedestrian safety. Further to this the area has high amenity value in terms of street landscaping, a variety of built form, coastal views, and ease of access to reserves and open spaces. A series of photographs of the site and surrounding area are included with **Attachment 2.**

For the able-bodied, the land is located within walking distance to the local centre, Long Bay Primary, Long Bay College, the sports fields at Ashley Reserve, Long Bay Medical Centre, New World, Long Bay

Regional Park, and Long Bay Beach. Long Bay is a 30-minute drive north of the Auckland CBD, 10km north-east of Albany and 18km north of Takapuna, and within easy reach of the main public transport hubs of the North Shore.

There are also public transport options, and the extensive reserve network at Long Bay in the immediate vicinity.

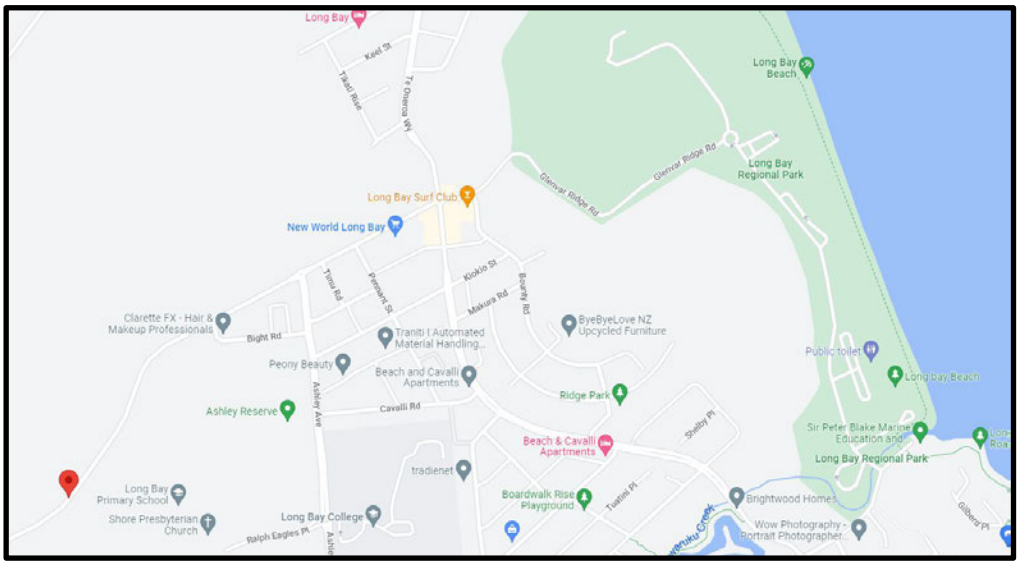


Figure 4: Locational Map (Source: Google Maps)

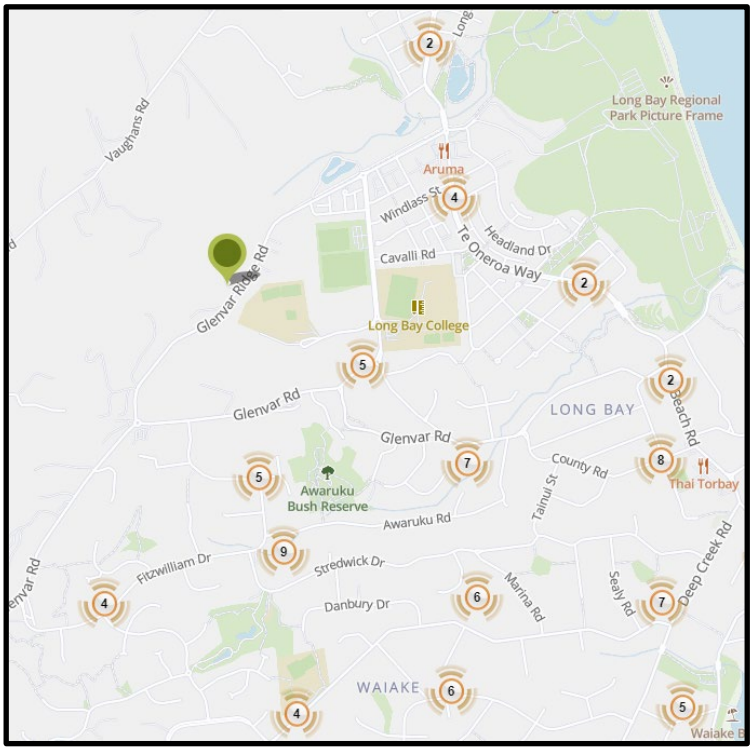


Figure 5: Nearby Bus Stops (number of bus stops at location indicated by number inside circle) (Source: https://at.govt.nz/bus-train-ferry/timetables/find-my-stop-or-station-on-a-map/)

The land to the immediate east of the sites is owned by Templeton Long Bay North Limited. This land is currently under development for more intensive residential forms. The land adjacent to Glenvar Ridge Road provides an opportunity for land to accommodate additional residential density without compromising Rural – Countryside Living zoned land further to the north on the other side of Vaughans Stream.

Current Zoning

There are several precincts applying to Long Bay in the AUP-OP. Sub-Precincts A, B and D apply to the land; Sub-Precincts A and B covers the Residential Large Lot Residential Zone portion of the land while Sub-Precinct D covers the Residential – Single House Zone portion of the land. The AUP-OP describes Sub-Precinct A as Large Lot Residential, Sub-Precinct B as Rural Residential and Sub-Precinct D as Suburban neighbouring – north of Vaughans Stream (Steam Protection A Area). Refer to AUP-OP zoning map below:

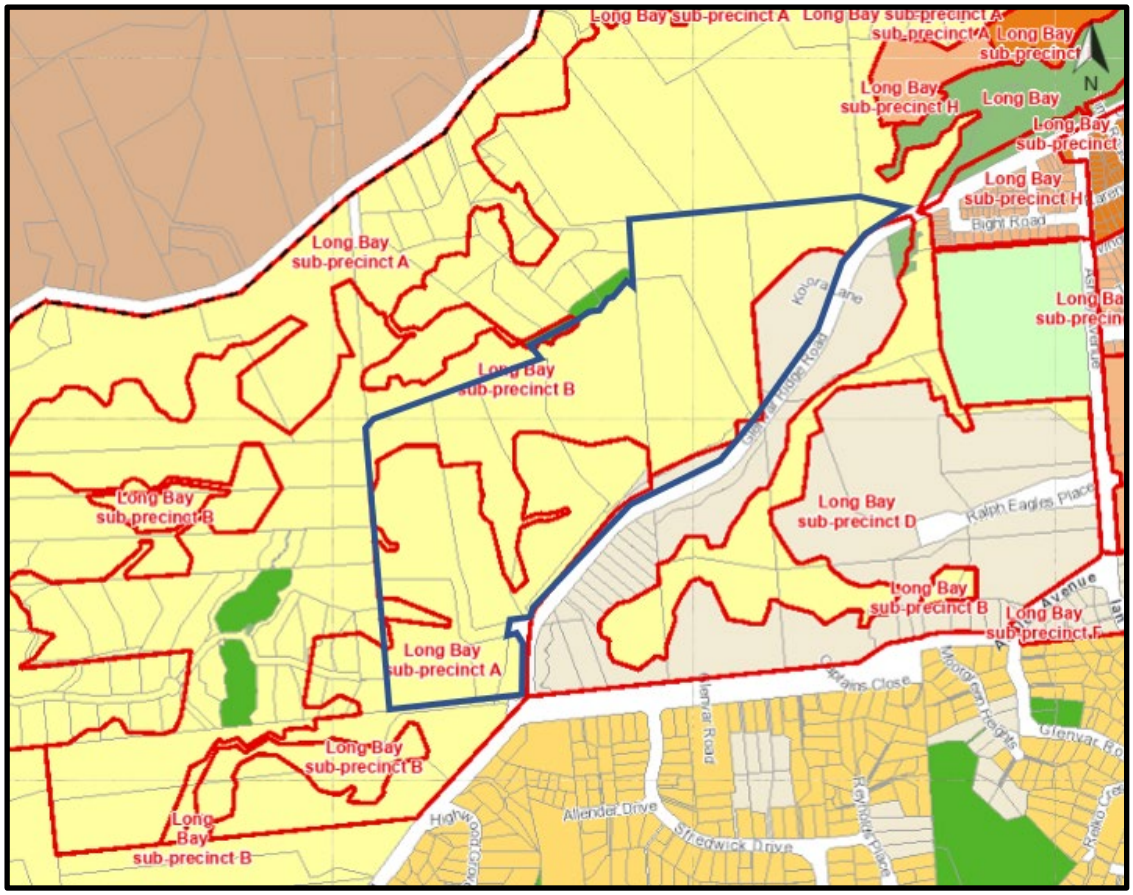


Figure 6: Zoning under the AUP-OP. The sites are outlined in purple.

Sub-Precinct B provides for Rural Residential living. Activity Table I519.4.3 provides for pastoral farming and horticulture as permitted activities within Sub-Precinct A and B. These activities are incompatible with the surrounding development. Instead, the sites are likely to be subdivided like those on the other side of Vaughans Stream and used for large lifestyle lots; this is a completely inefficient use of this land which is ideally located, and physically able, to be developed for residential purposes.

Planned Development

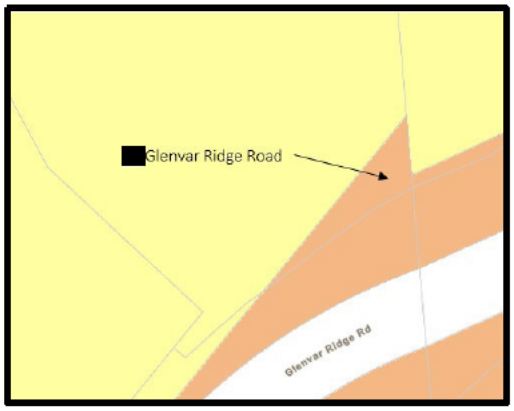
Given advice from experts about the ability to physically develop the land for high density residential development, while managing environment effects, the submitter, our client, is in the process of preparing a private plan change to rezone the land subject to this submission to enable a greater density of residential development on the land. Auckland Council are aware of the proposed plan change. A meeting was held with Council officers to discuss the proposal in March 2022. They will then seek to apply for subdivision and land use consents to develop the land. The Plan Change and resource consents are due to be submitted early 2023.

Plan Change 78: Intensification

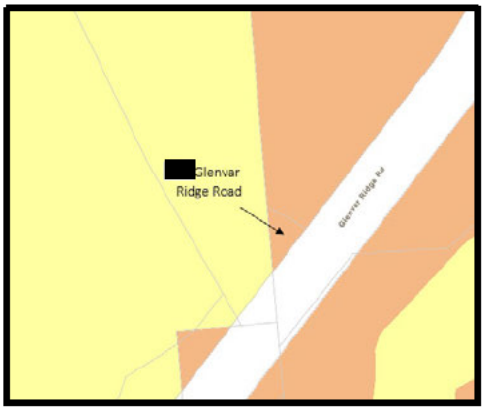
Rather than undertake an analysis of whether the Residential – Large Lot zoned land in question should be subject to the MDRS provisions the s32 analysis simply states that the MDRS requirements do not apply to the Residential – Large Lot zone.

Plan Change 78 zones the land as follows:

- Residential – Large Lot Zone [redacted] Glenvar Ridge Road)
- Very small portions of [redacted] Glenvar Ridge Road are zoned as Residential – Mixed Housing Zone (See figures below) however this is limited to the new Residential – Low Density Residential zone due to the Long Bay Precinct being a Qualifying Matter. Larger portions of land are zoned as Residential – Mixed Housing Zone on [redacted] Glenvar Ridge Road.



[redacted] Glenvar Ridge Road



[redacted] Glenvar Ridge Road

It also identifies the following qualifying matters being present across the land:

- Flood Plains ([redacted] Glenvar Ridge Road)
- Significant Ecological. Areas – Terrestrial ([redacted] Glenvar Ridge Road)
- Precinct [redacted] Glenvar Ridge Road)
- Water and/or Wastewater Constraints Control ([redacted] Glenvar Ridge Road)
- Designation ([redacted] Glenvar Ridge Road)
- Historic Heritage Place Overlay [redacted] Glenvar Ridge Road)

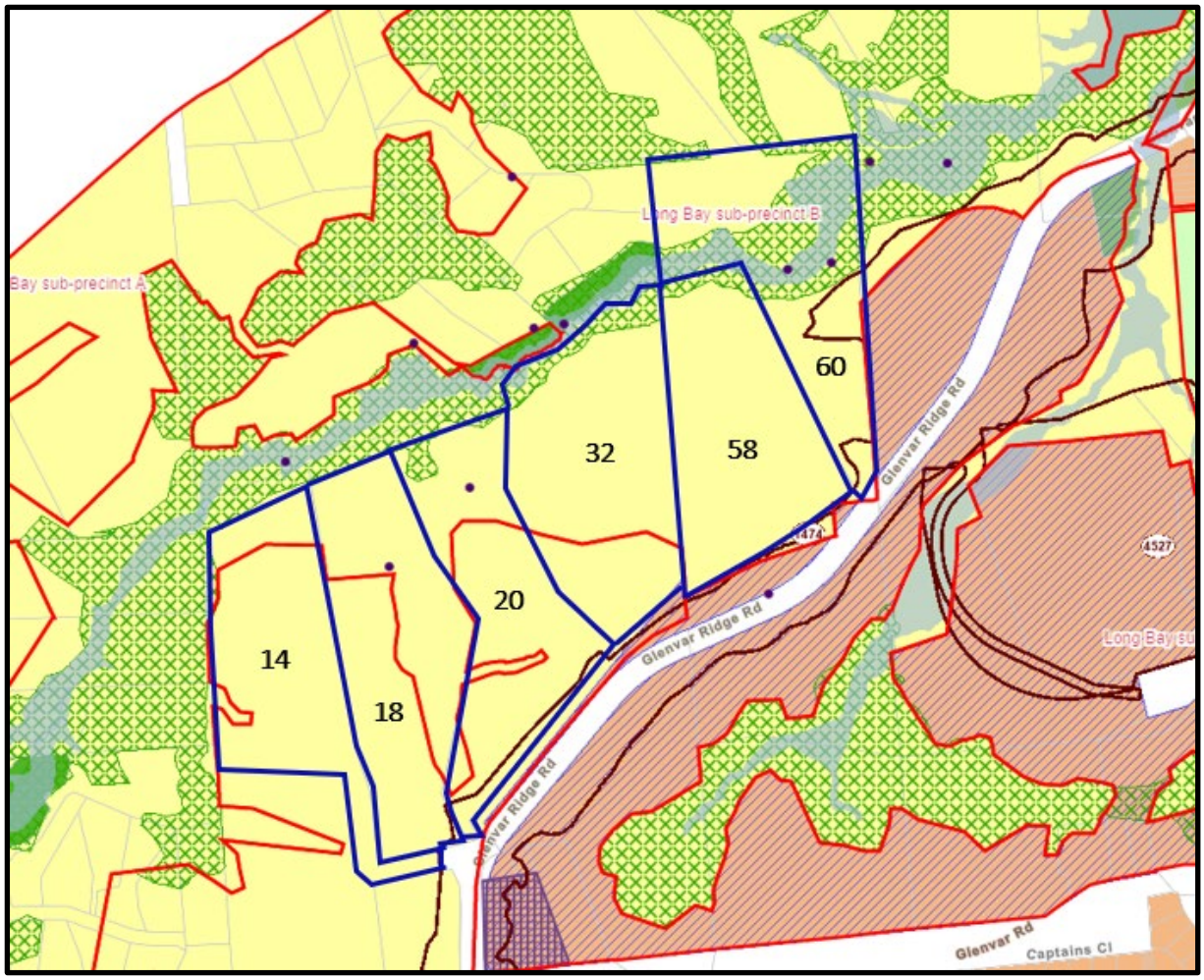


Figure 7: PC78 Zoning and Qualifying Matter Map (site boundaries indicative)

The s32 report for Long Bay states:

> *This evaluation report will continue to be refined in response to any consultation feedback provided to the council, and in response to any new information received. No specific pre-notification consultation has been undertaken.*

The dates of the figures etc. within the s32 report are dated June 2022. It appears that despite feedback given on the draft MDRS provisions that no further evaluation has been undertaken. Our client presented feedback on the draft MDRS provisions (a copy of which is included within **Attachment 3**) and Auckland Council policy planners were aware of the proposed private plan change.

As set out above, the MDRS provisions do give scope to change residential zonings. PC78 has replicated the zoning patterns applying to the site under the AUP-OP. No consideration has been given to whether any rezoning should occur as a part of PC78 with respect to the subject site. This is particularly so with the plan changes also required to implement the National Policy Statement – Urban Development ("**NPS – UD**") in relation to walkable catchments and building height and with well-functioning urban environments being of national importance.

The sub-precent evaluation for Sub-Precinct D within the s32 report is as follows:

Integrated evaluation for sec 77K (a) to (i) qualifying matters for Sub-precinct D

Sub-precinct D provides for lower density residential lots in the Stream Protection A area (high quality stream). 600m² site area applies. Significant Ecological Areas that follow stream corridors are identified as Long Bay Sub-precinct B.

Qualifying matters in section 77I/O(a) to (i)	Significant Ecological Areas (SEA) overlay responding to Section 6(c) of the RMA and Policy 11 of the NZCPS	Stream Protection A area responding to Policy 22 of the NZCPS (Sedimentation) and sec 8, Hauraki Marine Park Act
Relevant precinct provisions supporting QMs	Residential – Single House Zone • Table I519.1.1 • I519.2 Objective (12) • I519.3 Policies (6)(c), (45), (46), (54) • I519.4.1 Activity Table (A2), (A5), (A6), (A7), (A8), (A9), (A14), (A15), (A18). • I519.4.6 Activity Table • I519.6.2 Building height (1), and (2) • I519.6.3 Yards (1), (7), (8) • I519.6.4 Building coverage (1) • I519.6.20 Subdivision (1)	Residential – Single House Zone • Table I519.1.1 • I519.2 Objective (12) • I519.3 Policies (6)(c), (45), (46), (54) • I519.4.1 Activity Table (A2), (A5), (A6), (A7), (A8), (A9), (A14), (A15), (A18). • I519.4.6 Activity Table • I519.6.2 Building height (1), and (2) • I519.6.3 Yards (1), (7), (8) • I519.6.4 Building coverage (1) • I519.6.20 Subdivision (1)
Effects managed	Effects on indigenous vegetation and fauna	Effects on steam health and receiving environment
Applies to residential / non-residential zone in relation to Policy 3 and / or MDRS	Residential – Single House Zone is a relevant residential zone	
How qualifying matter changes level of development enabled by Policy 3 and / or MDRS	Important aspects of the Sub-precinct are the larger lots sizes (600m²), 35% building coverage and limited impervious area coverage (50%). Larger site size and modest building coverage helps reduce pressure to remove SEA vegetation in stream valley to accommodate expected development, and/ or install large retaining structures that may modify ground water flows.	Larger site size, lower building coverage along with impervious area limit helps manage stormwater impacts using on-site techniques. Note: MDRS does not control impervious area Larger lot size also assists with limiting earthworks (and as a result sediment generation)
Conclusion	Amend zoning to Residential – Low Density Residential	Amend zoning to Residential – Low Density Residential

Therefore, the single house zone portions of Sub-Precinct D applying to the site which have been zoned Residential Medium Intensity Residential on the PC78 maps are in fact limited to Residential – Low Density Residential by the precinct provisions.

Supporting Information

The National Policy Statement on Urban Development 2020 (NPS-UD) recognises the national significance of:

- having 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
- providing sufficient development capacity to meet the different needs of people and communities.

The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act passed into law on 20 December 2021. This Act amends the Resource Management Act 1991 (RMA) by bringing forward and strengthening the NPS-UD.

As demonstrated through the information above and attached, the land is ideally located, and physically able to be developed for more intensive residential development than provided for within the zones applied under the AUP-OP and now PC78.

The changes proposed through Plan Change 78 seek to zone the AUP-OP Residential – Single House Zone land Residential- Low Density Residential. This outcome is only enabled where there are Qualifying Matters that would be incompatible with the level of development enabled by the MDRS; or where the Qualifying Matters makes the level of development promoted by the Amendment Act in appropriate in light of the national significance of urban development and the objectives of the National Policy Statement – Urban Development ("NPS-UD").

Application of Qualifying Matters

The Proposed Plan Change 78- Intensification to the Auckland Unitary Plan (Operative in Part) Residential and Business Zones Section 32 Evaluation Report[1] highlights that the proposed Low Density Residential zone is applied to urban residential areas where:

- *"where relevant qualifying matters require and result in a lower intensity of development, limiting the levels of development.*
- *MDRS are enabled as a permitted activity in the zone to a limited extent to ensure that it does not detract from the identified qualifying matters that exist in these zones. For instance, the height in relation to boundary, landscaped area, outlook, outdoor living area and windows to street standards have all been aligned to MDRS.*
- *The permitted activity density standards of the MDRS relating to the number of dwellings per site, height, front yards and building coverage are less enabling than MDRS. This is to provide for a reasonable level of development whilst ensuring that development responds to qualifying matters that relate to the site and delivering quality built environment outcomes as directed under the RPS."*

It is understood that the Auckland Council has identified this land as not being suitable for Medium Density zoning i.e. Residential- Mixed Housing Urban given the Qualifying Matters on the Site. Clause 77L of the legislation states:

[1] The Proposed Plan Change 78- Intensification to the Auckland Unitary Plan (Operative in Part) Residential and Business Zones Section 32 Evaluation Report, Prepared by Auckland Council.

77L Further requirement about application of section 77I(j)

A matter is not a qualifying matter under section 77I(j) in relation to an area unless the evaluation report referred to in section 32 also—

(a) identifies the specific characteristic that makes the level of development provided by the MDRS (as specified in Schedule 3A or as provided for by policy 3) inappropriate in the area; and

(b) justifies why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD; and

(c) includes a site-specific analysis that—

(i) identifies the site to which the matter relates; and

(ii) evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter; and

(iii) evaluates an appropriate range of options to achieve the greatest heights and densities permitted by the MDRS (as specified in Schedule 3A) or as provided for by policy 3 while managing the specific characteristics.

Plan Change 78 has not demonstrated that the requirements of clauses 77J or 77L have been met. 77J states:

77J Requirements in relation to evaluation report

(1) This section applies if a territorial authority is amending its district plan (as provided for in section 77G).

(2) The evaluation report from the specified territorial authority referred to in section 32 must, in addition to the matters in that section, consider the matters in subsections (3) and (4).

(3) The evaluation report must, in relation to the proposed amendment to accommodate a qualifying matter,—

(a) demonstrate why the territorial authority considers—

(i) that the area is subject to a qualifying matter; and

(ii) that the qualifying matter is incompatible with the level of development permitted by the MDRS (as specified in Schedule 3A) or as provided for by policy 3 for that area; and

(b) assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and

(c) assess the costs and broader impacts of imposing those limits.

(4) The evaluation report must include, in relation to the provisions implementing the MDRS,—

(a) a description of how the provisions of the district plan allow the same or a greater level of development than the MDRS:

(b) a description of how modifications to the MDRS as applied to the relevant residential zones are limited to only those modifications necessary to accommodate qualifying matters and, in particular, how they apply to any spatial layers relating to overlays, precincts, specific controls, and development areas, including—

(i) any operative district plan spatial layers; and

(ii) any new spatial layers proposed for the district plan.

(5) The requirements set out in subsection (3)(a) apply only in the area for which the territorial authority is proposing to make an allowance for a qualifying matter.

(6) The evaluation report may for the purposes of subsection (4) describe any modifications to the requirements of section 32 necessary to achieve the development objectives of the MDRS.

The s32 Report **does not**:

- Demonstrate why the council considers the qualifying matter is incompatible with the level of development permitted by the MDRS.
- Assess the impact that limiting development capacity will have on the provision of development capacity; or assess the costs and broader impacts or proposing those limits.

And in relation to 77L -

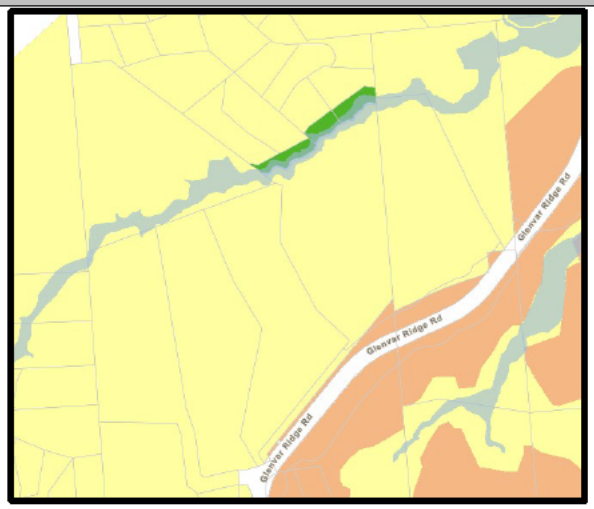
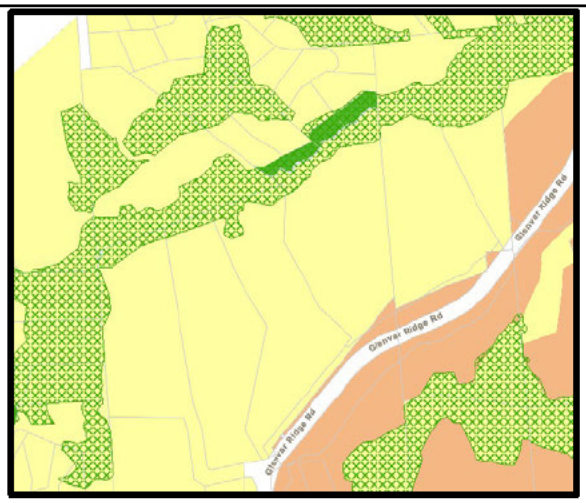
- Does not justify why the characteristic (qualifying matter) makes the level of development promoted by the Amendment Act inappropriate in light of the national significance of urban development and the objectives of the NPS-UD.

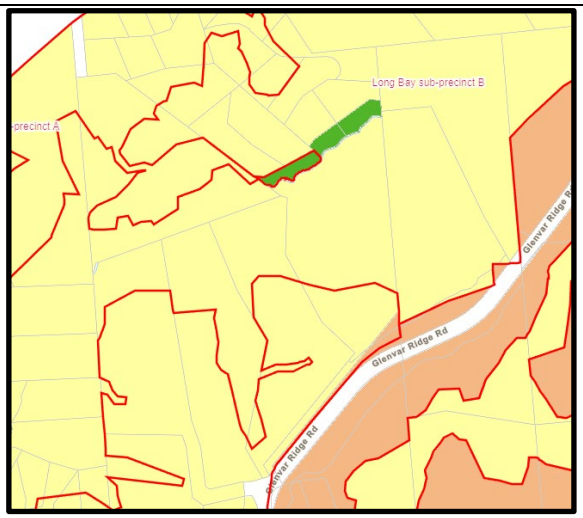
Restricting the application of the Residential- Mixed Housing Urban Zone is not justified for this land. The Qualifying Matters that are relevant to the land are controlled by other operative rules within Chapter E the AUP-OP.

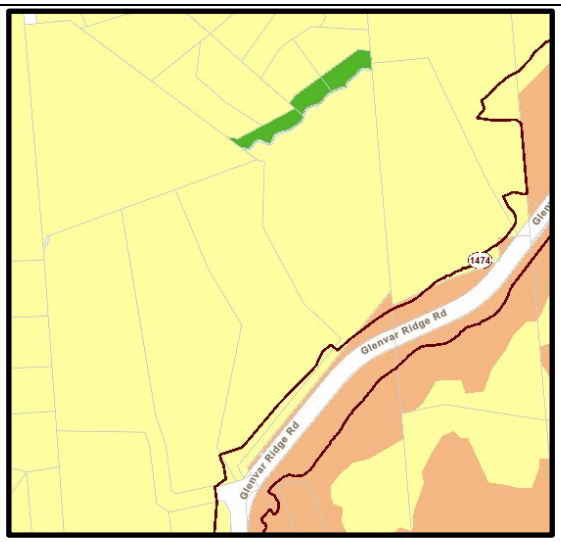
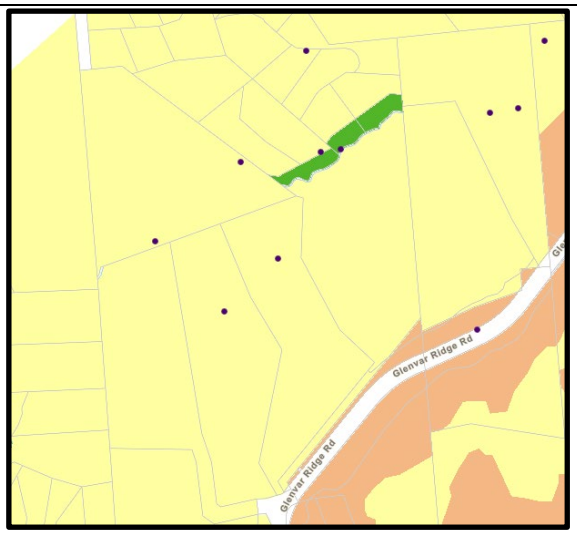
Restricting the development opportunities on this large site, close proximity to the Long Bay Village is not in accordance with the purpose of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 or Policy 3 of the NPS-UD.

This land presents a significant opportunity to provide for more homes within the Long Bay catchment that are within walking distance to the local centre. 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.

An assessment of each Qualifying Matter is provided in the table below:

Qualifying Matter	Map	Comment
Flood Plains ([redacted] Glenvar Ridge Road)		The flood areas are protected via rules within AUP-OP. The flood overlay should not be a qualifying matter; flooding matters are able to be managed through careful design and there are rules within the AUP-OP to manage flooding effects. Much, if not all, of the land subject to this qualifying matter will be vested as esplanade reserve at the time of subdivision. In any event the mapped flood overlay does not necessarily depict the actual impact and therefore is not a tested Qualifying Matter that can be applied to the Land.
Significant Ecological. Areas – Terrestrial [redacted] Glenvar Ridge Road)		The SEA areas are protected via rules within Chapter E15 of the AUP-OP. The land in question is no different than the land to the east (64 Glenvar Ridge Road) which is part zoned as Medium Density Residential zone under PC78. The SEA overlay should not be a qualifying matter in this circumstance. Much, if not all, of the land subject to this qualifying matter will be vested as esplanade reserve at the time of subdivision.

Precinct [redacted] Glenvar Ridge Road)		Council have identified the presence of the Long Bay Precinct as a Qualifying Matter to restrict development. In seeking all the land to be zoned as Residential – Mixed Housing Urban we are seeking that the precinct provisions do not include any limitations to prevent development in accordance with the Residential – Mixed Housing Urban rules.
Water and/or Wastewater Constraints Control [redacted] Glenvar Ridge Road)		The s32 report notes that there are existing capacity issues in the East Coast Bays branch and the Torbay Branch Sewer and that solution optioneering is underway. The Long Bay catchment which would cover the land connects to the Long Bay Pump Station which pumps into the main trunk sewer to Browns Bay and then pumps through to the main trunk sewer to Mairangi Bay pump Station which is currently being upgrade. We do not consider there is a wastewater constraint for the Long Bay Catchment area. With respect to water, the Glenvar Reservoir would likely require a storage upgrade to allow for the increase in population as a result of the application of PC78 across the Long Bay area and other water catchments that it serves. This upgrade could be made as a result of funding by WLS/developer agreements to ensure that sufficient water

		supply can be provided without resulting in low of service levels to existing customers. The s32 report recognises that a significantly large private development proposal could fund the required work and the constraint may be removed. It is sought that this qualifying matter is removed from the land.
Designation ([redacted] Glenvar Ridge Road)		This should not be a qualifying matter – the designation has been given effect too and the road is operational.
Historic Heritage Place Overlay [redacted] Glenvar Ridge Road)		The Historic Heritage sites in question are middens on [redacted] and [redacted] Glenvar Ridge Road and middens & terraces as well as a ditch and bank on [redacted] Glenvar Ridge Road. These features are protected via the Historic Heritage Overlay in the AUP-OP and do not need to be a qualifying matter that limits residential development on the sites.

As demonstrated in the table above, the identified Qualifying Matters are not significant enough to limit the application of the Residential-Mixed Housing Urban Zone to the land. The rules within Chapter E of the AUP-OP will adequately manage the development outcome for the land.

Given the locational characteristics of the land, the development that has occurred, and is still

occurring, since the Long Bay Structure Plan was last considered; it is essential to consider whether the zoning over the land is appropriate in light of the new legislation. As the land is greenfields this is even more important as greenfields land generally enables higher residential density to be provided in a more efficient way while ensuring environment effects are recognized, managed, and protected, where appropriate, through design.

To achieve the outcomes stated in the NPS: UD and the Enabling Housing Supply and other matters Act, as well as to ensure the most efficient use of land, this submission seeks that all the land is zoned Medium Density Residential Zone.

Whilst it is acknowledged that the Council has taken a blanket approach to exclude Residential - Large Lot zoned sites from the application of the MDRS, the sites unique split-zoning characteristics, greenfield development potential and proximity to an existing local centre, makes mixed housing urban zoning and related residential development a better, more efficient outcome for the land than the existing zoning pattern. The zoning sought is more in keeping with the new legislation.

It is our submission that the land is entirely suitable for inclusion within PC78 as Medium Density Residential zone and that this is one of the circumstances where Council should exercise their discretion to include other zones as Medium Density.

Summary

The scope of PC78 includes the sites and the strategic direction of the NPS-UD requires a re-assessment of development opportunities for the land.

While the Council might consider that Residential Large Lot zone is not under consideration as a part of the blanket approach taken to applying the Residential - Mixed Urban Zone, it is necessary and appropriate to look at these sites in the context of the surrounding zoning.

The application of the Residential- Large Lot Zone in this location is no longer suitable for this site, when considering the adjoining zones, land uses and current development, the definition of the Residential - Large Lot Zone in the National Planning Standards and when considered in the context of the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The existing zoning, and the legislation has changed significantly since the zone was applied, and even since the Unitary Plan process.

Rezoning sought, i.e. Residential – Mixed Housing Urban with no qualifying matters, provides a significant positive opportunity to enable a comprehensive approach to residential development on this land.

Plan Change 79 – Transport

The Submitter's support the new provisions proposed in PC 79 – Chapter E27 accessible parking, safe and direct site access for pedestrians in residential zones, equipment to facilitate use of electric vehicles, bicycle parking standards.

With respect to the requirements to provide charging equipment for electric vehicles this is supported subject to Auckland Council ensuring there is sufficient electricity infrastructure available to provide the required power supply for these services without adversely affecting existing businesses and dwellings in Long Bay.

The Submitter's oppose the changes to the subdivision standards for Access to rear sites. If the changes are to be made the provisions require further clarification that Council and Auckland Transport will assess the effects of individual proposals via a resource consent for a Restricted Discretionary activity where the standard is exceeded. It is often more efficient to service more than 10 sites from a Jointly Owned Access Lot (JOAL) or Right of Way. Providing a clearer consenting pathway with supporting Matters of discretion and assessment criteria can enable better environmental outcomes to be achieved.

Rule E38.4.2 (A30) should be amended to change the activity status to RD – Restricted Discretionary from D – Discretionary.

Rule E38.4.2 (A31) should be amended to change the activity status to RD – Restricted Discretionary from D – Discretionary.

E38.12 Assessment restricted discretionary activities and E38.12.1 should be amended to provide for infringements to the Access to rear sites rules. The provisions will need to be amended to include matters of discretion and related assessment criteria.

<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 Objectives and 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 and to remove direction to limit intensification

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:*
> *(ii) 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 submission seeks 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.

The submitter 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[2]. 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 the Submitter notes 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.

In relation to Auckland – all of urban Auckland (i.e. excluding rural and coastal townships) falls within category (c) of Objective 3 of the NPS-UD, particularly Long Bay.

As a result it is necessary for all of urban Auckland to have the maximum zoned intensity possible. Further the demand for housing and the changes to desirable housing typology means that applications for resource consent should be considered on their merits and within the context of the most appropriate zoning and the relevant overlay / precinct provisions. Reducing zoned opportunity to the smallest possible extent reduces the opportunity to design sensible and careful developments that respond to the specific values of a site rather than just minimizing any kind of development.
The proposed changes to the RPS seek to give effect to Objective 3 and 4 of the RPS.

The proposed changes to the RPS are the most appropriate outcome to give effect to the NPS-UD and is required by s61(1)(da) of the RMA.

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

Decision Sought

Red Rhino Limited and Airport Rent A Car Limited seek the following decision by Auckland Council: that PC78, PC79 and PC80 be approved in part subject to the matters raised within this submission, namely:

Proposed Plan Change 78

- The rezoning of the land at [redacted] Glenvar Ridge Road, Long Bay to the Residential – Mixed Housing Urban with no qualifying matters applying (because the existing overlay provisions address the relevant matters in any event).
- The rezoning of all of the land identified in **Figure 1**, above.
- Any other relief required to achieve the outcomes sought in the submission.

Proposed Plan Change 79

- Amend Rule E38.4.2 (A30) to change the activity status to RD – Restricted Discretionary from D – Discretionary.
- Amend Rule E38.4.2 (A31) to change the activity status to RD – Restricted Discretionary from D – Discretionary
- Add matters of discretion and assessment criteria to E38.12 and E38.12.1 to provide for infringements to the Access to rear sites rules. The provisions will need to be amended to include matters of discretion and related assessment criteria.
- Any other relief required to achieve the outcomes sought in the submission.

Proposed Plan Change 80

- 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.
- Express what climate change resilience will entail with respect to urban growth and form, natural resources, coastal environment, and environmental risk.
- Amend Objective 2.3.1 (1) by adding a new "a" and renumbering accordingly:
  enabling as many people to live in, and as many businesses and community services to be located in, areas of an urban environment as is reasonably practical and recognizing that this objective has the highest priority.
- Amend Policy 2.3.2(1) by adding a new "a" and renumbering accordingly:
  maximises the enabled intensification of all urban zoned sites and allows resource consent applications to address the interface between the zoning and any applicable overlay or precinct provisions through the resource consent process.
- Reject the proposed changes to Objective B2.4.1(1A).
- Reject the proposed changes to Policy B2.4.2, except in relation to climate change and natural

hazards.

- Reject references to limiting intensification in Para 4 of B2.9.
- Any other relief required to achieve the outcomes sought in the submission.

Hearing of Submission

Red Rhino Limited and Airport Rent A Car 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.



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

Date 29 September 2022

Address for Service:

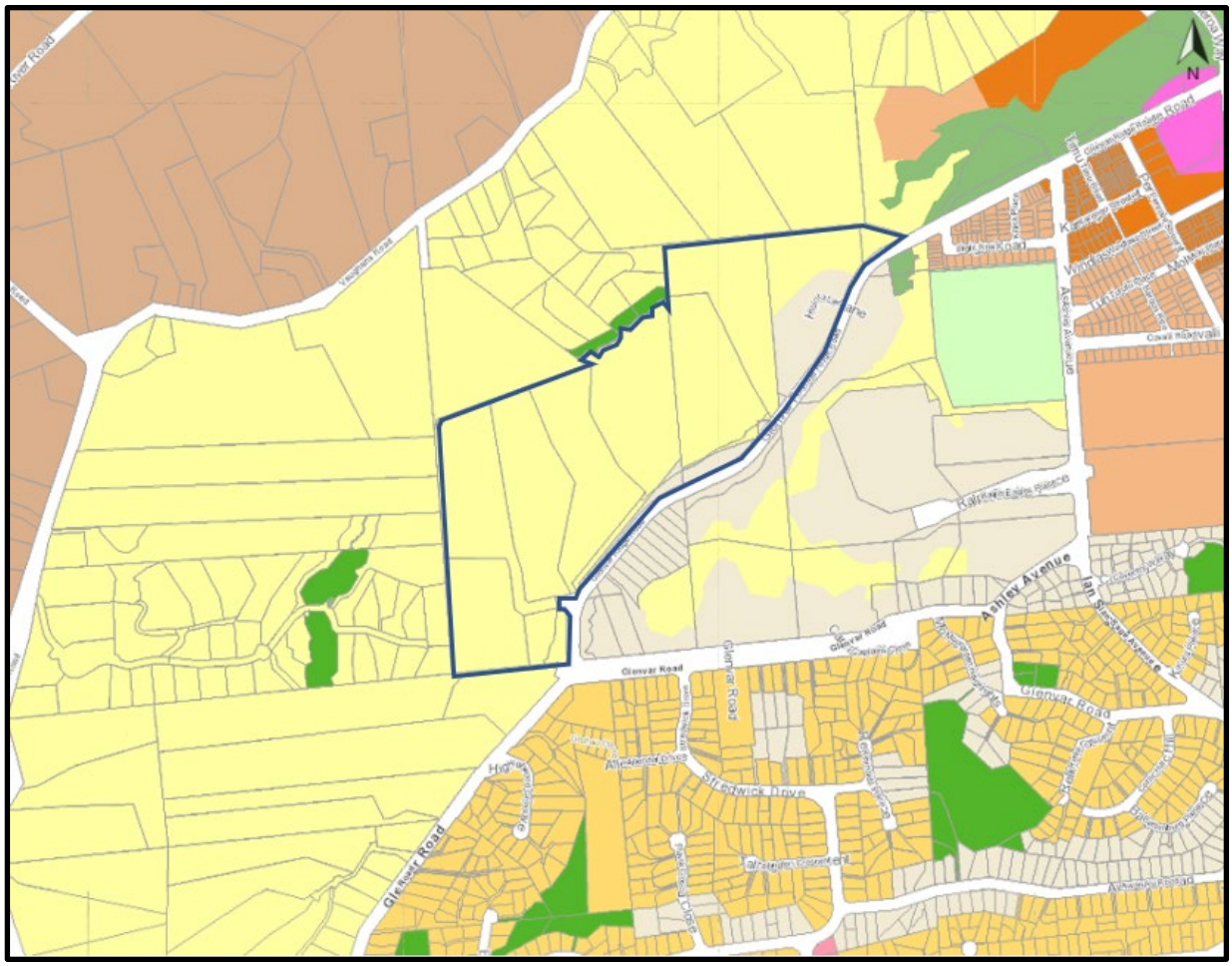
Red Rhino Limited and Airport Rent A Car Limited The Planning Collective Limited
PO Box 591
Warkworth, 0941
Attn: [redacted]
[redacted]
[redacted]

Attachments:

1: AUP – OP Zoning Map
2: Photographs of subject sites and surrounding area (Captured 28/09/22)
3: Feedback Comments on the Draft Implementation of the Resource Management (Enabling Housing Supply and Other Matters Act 2021).

Attachment 1:

AUP-OP Zoning Map



Attachment 2:

Photographs of subject sites and surrounding area (Captured 28/09/22)














PRIVATE
PROPERTY







Attachment 3:

Feedback Comments on the Draft Implementation of the Resource Management (Enabling Housing Supply and Other Matters Act 2021).

#8541

9 May 2022

Auckland Council
unitaryplan@aucklandcouncil.govt.nz

Attention: Senior Policy Planner- Plans and Places Auckland Council.

Dear Sir/Madam,

[redacted] Glenvar Ridge Road, Long Bay – Feedback Comments on the Auckland Council Draft Implementation of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

Auckland Council has released a draft of how the Council intends to respond to the two Government led policy directions being the National Policy Statement on Urban Development and the Medium Density Residential Standards that are a part of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

Red Rhino Limited and Airport Rent A Car Limited are clients of The Planning Collective who are the land owners of [redacted] Glenvar Ridge Road in Long Bay. The sites are currently zoned Residential – Large Lot. A small portion of the land at [redacted] Glenvar Ridge Road being zoned Residential Single House. The sites are within both Long Bay Precinct A and Long Bay Precinct B. The draft Planning Maps do not propose to rezone the land. The subject sites and wider area are identified as *'Area Under Investigation'*.

The purpose of this letter is to provide feedback relating to the identified sites and the wider area.

In particular, the Consultation document notes that you are seeking feedback on the:

- *size of areas around our suburban town and local centres where additional height and housing density can occur and what the building heights and density limits are.*
- *The distances of walkable catchments where buildings of six or more storeys are required*

- *Other additional qualifying matters that should apply in Auckland*[1]

Description of the site

The subject sites at Long Bay are zoned Residential – Large Lot and Residential – Single House as identified above and collectively comprise approximately 20-ha of greenfield land. The sites are situated on the periphery of the existing urban area currently undergoing conversion from low-density to medium density housing. The sites have southern boundary frontage to Glenvar Ridge Road and are characterised by undulating topography sloping northwards towards Vaughans stream.

For the able-bodied, the sites are located within walking distance to the local centre, Long Bay Primary, Long Bay College, the football fields at Ashley Reserve, Long Bay Regional Park and Long Bay Beach.

A corridor of Significant Ecological Area traverses the northern portion of the sites. Across three of the five sites are Historic Heritage and Special Character overlays relating to Historic Heritage Places identified. These include Midden R10_990, Midden R10_989, Midden and Terraces R10_985, and Ditch and Bank, Pit R10-986. Also applying to the sites are Long Bay sub-precincts A, B and a very small area of sub-precinct D.

The Unitary Plan describes the Sub-precincts A and B as predominantly large lot residential land. Rural Residential Land is provided for in Sub-precinct B. Sub-precinct D provides for single housing, with some higher intensity integrated housing fronting the main roads and reserves. The land to the immediate east of the sites is owned by Templeton Long Bay North Limited and this land is currently under development for more intensive residential forms.

[1] Consultation Document: Government's new housing rules: What is means for Auckland.

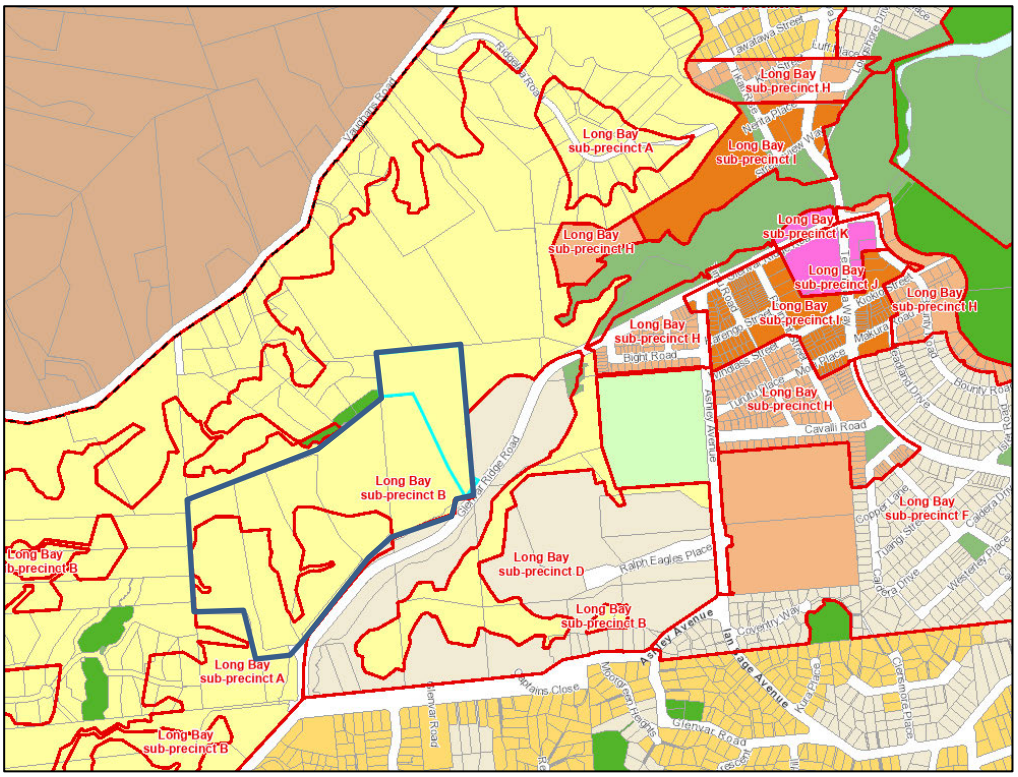


Figure 1- Zoning under the AUP-OP. The site is outlined in purple. (Source: AUP-OP GeoMaps 6/05/2022)

Walkable Catchments

Higher density residential development is proposed for sites within the catchment of small town centres or large local centres with high accessibility. These sites must be within a 3-minute walk or less; or located within a distance of 200m from the centre. The subject sites are located approximately 1km from the local Long Bay centre. A walk time to the centre will take the average person less than 10 minutes.

Auckland Council, in *The National Policy Statement on Urban Development and Medium Density Residential Standards, Auckland Council's Preliminary Response*, defines the environmental factors that contribute to the walkability of a catchment in the below points:

- Topography
- Street crossings
- Block size
- Land use mix
- Traffic volumes
- Perceived safety

Affects how far people can walk

Affects how far people want to walk

Walkability from the subject sites to Long Bay Local Centre is considered to be near ideal. Walking is facilitated by new, wide footpaths that span the length of Glenvar Ridge Road on both sides, three existing pedestrian crossings, flat topography along the urbanised section of the road, and the grass berm and landscaped setback of the footpath from the road that provides for pedestrian safety. Further

to this the area has high amenity value in terms of street landscaping, a variety of built form, coastal views and ease of access to reserves and open spaces.

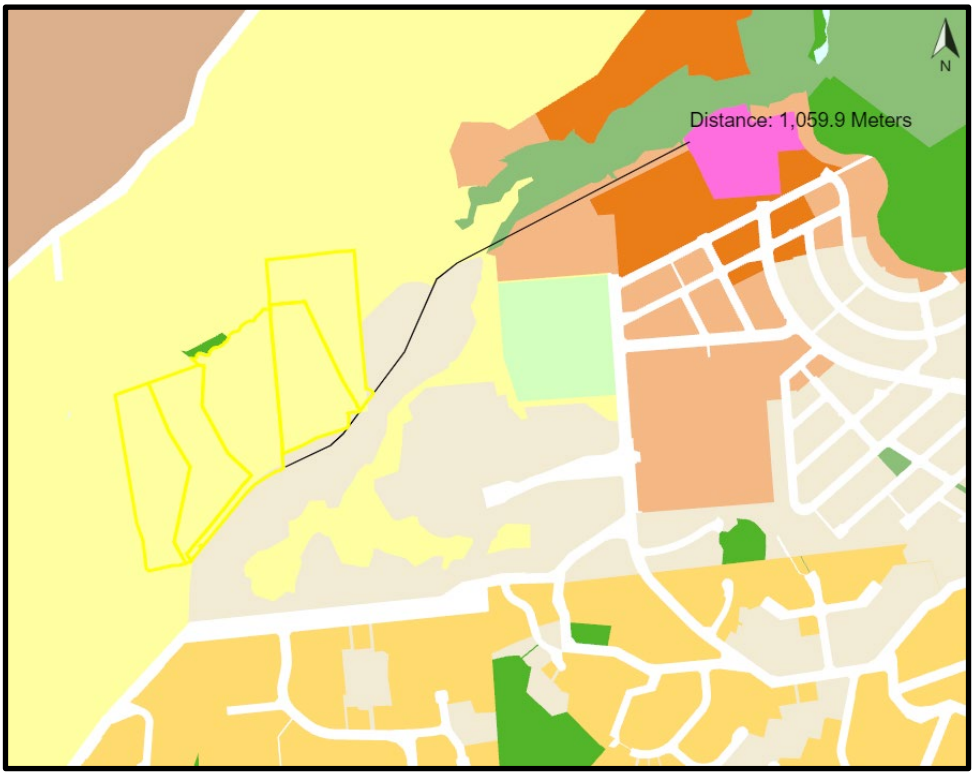


Figure 1: Distance from subject sites to Long Bay Local Centre (Source: Auckland Council GeoMaps).

Proposed Development

Our client are applying for a plan change to rezone the sites to enable a greater density of residential development on the land. They will then seek to apply for subdivision and landuse consents to develop the land. An indicative scheme plan for the proposed development is shown in Figure 3. The Plan Change and resource consents are due to be submitted later in 2022.

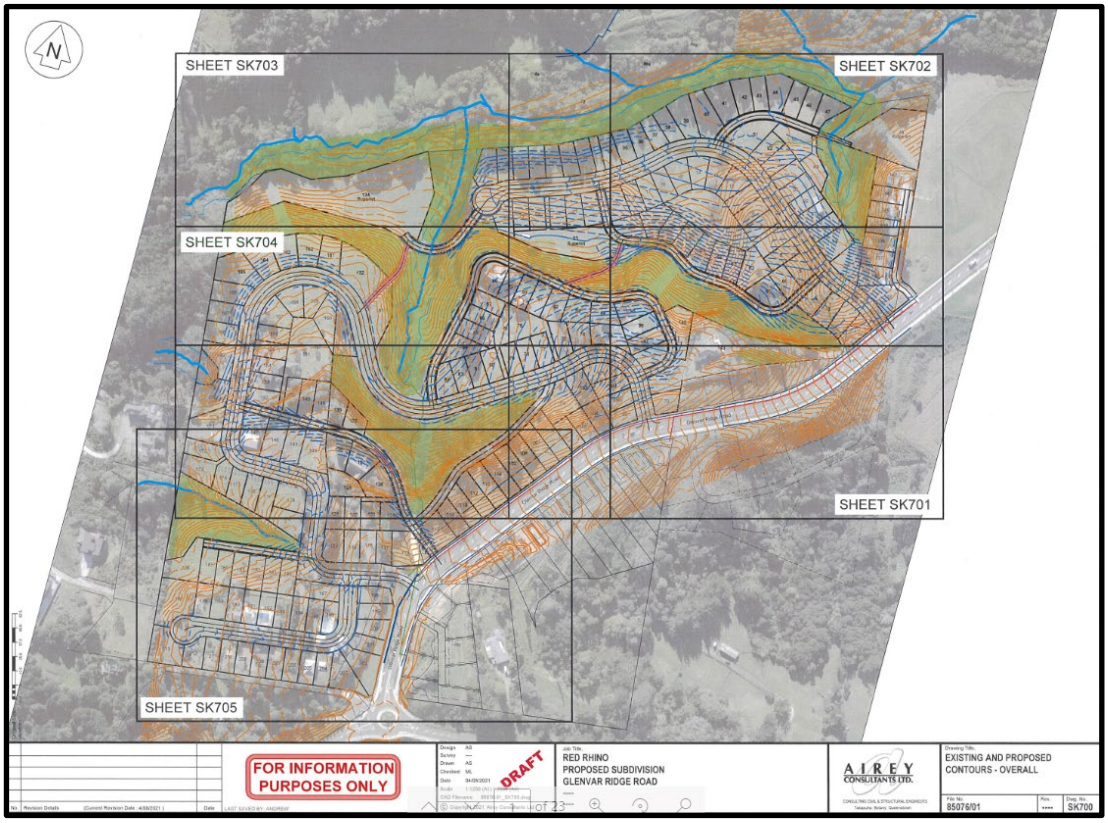


Figure 2: Preliminary plans (Source: Aireys Consultants Ltd)

Implications of the proposed draft zoning

Proposed Zoning

Auckland Council's *Preliminary response viewer for NPS-UD and MDRS* does not propose to rezone the sites. It is noted that the sites lie within an Area of Investigation as shown in Figure 3 below.

The qualifying matters applicable to the sites are the overlays and precincts stated in the description:

- Historic Heritage Place Overlay
- Significant Ecological Areas – Terrestrial
- Precinct Under Investigation
- Designation

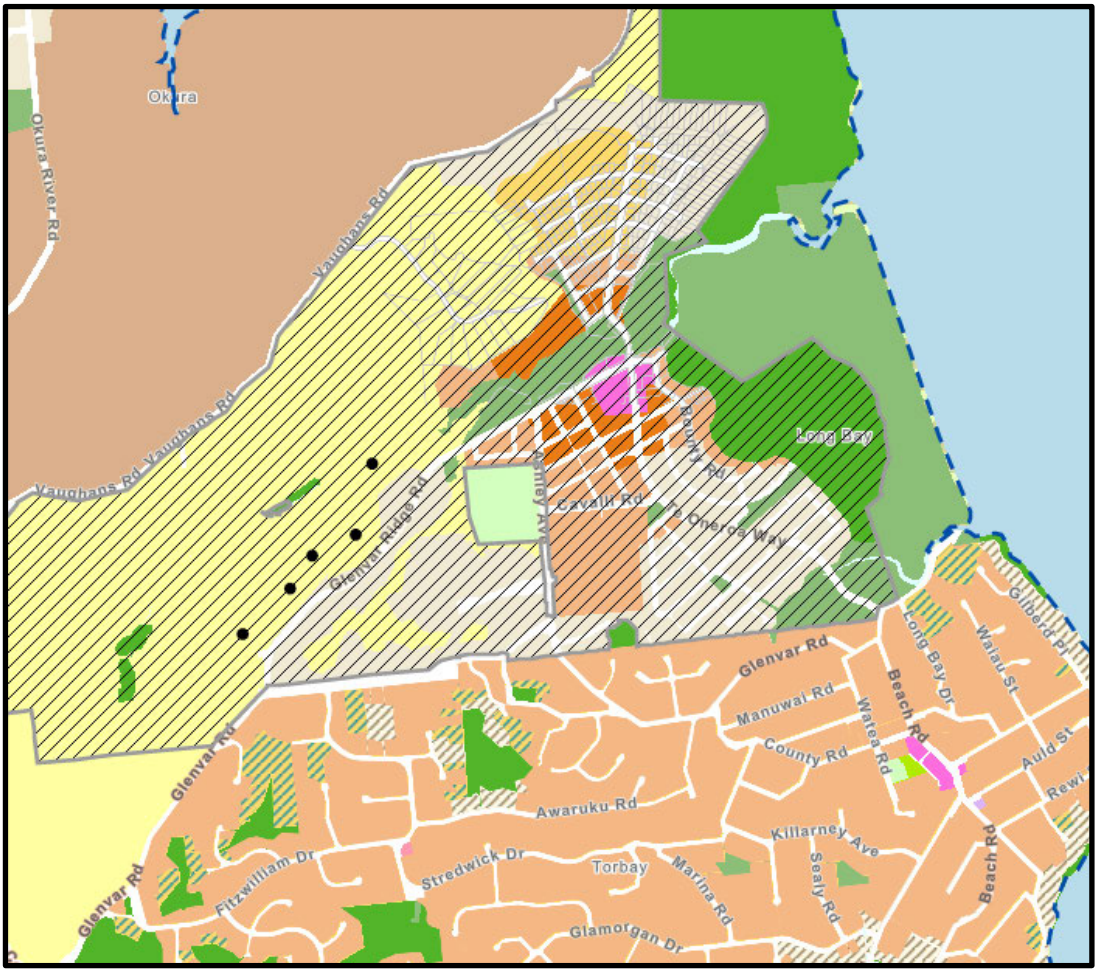


Figure 3: Draft Planning Maps. Sites identified by approximate black markers within Area of Investigation. (Source: Preliminary response viewer for NPS-UD and MDRS).

Implications

As shown on the draft Planning Maps above, the sites are situated within a precinct under investigation. This notation is supported and the submitter's wish to assist Auckland Council in any way to demonstrate that the land is in fact suitable for more intensive residential development to achieve the outcomes stated in the NPS: UD and the Enabling Housing Supply and other matters Act.

The Long Bay Precinct has enabled development of a new community on greenfield land in an integrated and sustainable way that protects and enhances the natural environment. Glenvar Ridge Road provides an opportunity for land to accommodate additional residential density without compromising Rural – Countryside Living zoned land further to the north.

The sites [redacted] Glenvar Ridge Road are located within approximately 1km walking distance, an approximate 10 minutes' walk of Long Bay Local Centre. There is also Public Transport options and the extensive reserve network at Long Bay in the immediate vicinity. Infrastructure can be upgraded to provide capacity to accommodate additional development. There are no known water supply or other constraints.

Whilst it is acknowledged that the Council has taken a blanket approach to exclude Residential - Large Lot zoned sites from the application of the MDRS, the sites unique split-zoning characteristics, greenfield development potential and proximity to existing local centres makes mixed housing urban zoning and related residential development a better, more efficient outcome for the land than the existing zoning pattern.

Summary

While Residential Large Lot zone is not under consideration as a part of the blanket approach taken to applying the Residential - Mixed Urban Zone, it is appropriate to look at these sites in the context of the surrounding zoning. The application of the Residential- Large Lot Zone in this location is no longer suitable for this site, when taking into account the adjoining zones, land uses and current development, the definition of the Residential - Large Lot Zone in the National Planning Standards and when considered in the context of the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. Rezoning provides a significant positive opportunity to enable a comprehensive approach to residential development on this land.

On behalf of the landowner/developer, we seek that the Auckland Council Policy Team up-zone the sites at [redacted] Glenvar Ridge Road, Long Bay. We can provide a more detailed zone markup area prior to notification of the Intensification Plan Changes in August this year. We can also provide s32 Analysis to support revised zoning patterns in this location. Please let us know if this would be of assistance to Auckland Council. Alternatively, an onsite meeting could be valuable. Please let us know.

Yours sincerely

[redacted]
The Planning Collective 2021 Limited
[redacted]

End of Report

End of Report