Future Development Strategy

Organisations

WRITTEN FEEDBACK
Volume 4

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

Future Development Plan 2023 #8034

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?

#8034

Titirangi
Residents & Ratepayers Association

Submission by the Titirangi Residents & Ratepayers Association on Auckland Future Development Strategy 2023-2053

3 July 2023

From: Titirangi Residents & Ratepayers Association
Contact: [redacted]

1. Introduction

1.1. Thank you for the opportunity to present the **Titirangi Residents & Ratepayers Association**'s submission on the **Auckland Future Development Strategy 2023-2053**.

1.2. This submission is made by The Titirangi Residents and Ratepayers Association, a non-profit incorporated society formed in 1987 to promote and represent the interests of ratepayers and residents in the Titirangi area. The Association can be traced back to the 1920s when an unincorporated society is recorded as lobbying Council regarding roads.

1.3. We wish to speak to our submission if that opportunity is provided.

2. Submission

How and Where Auckland Should Grow:

2.1. Auckland should grow upwards, not outwards. No more greenfield development. The FDS states that this is an aim, yet its strong focus on the 'future urban' allocations directly contradict this throughout.. As a 'key aspect of spatial and growth planning', it lists: "**Future urban areas:** new greenfield areas to be established on the fringe of the existing urban area, and in rural and coastal settlements". And we see no evidence in the text that *existing* urban is to be prioritised systematically over *future* urban.

2.2. Enable more intensification in areas with good public transport & near town centres, but must be done well. 'Intensification' is mentioned many times, and 'quality compact' growth, 'quality design', 'quality development' and 'quality' living environments. Yet 'quality' is not defined, nor how this might even be incentivised. Development currently is largely up to developers: for any aims to be more than a fantasy or wish list, the outcomes, and how a chosen regulatory approach will achieve them, need to be clear. The Government's Medium Density Residential Standards will deliver an appalling outcome a very long way from quality development and should never be implemented by Auckland Council.

2.3. Enable more high rise & less medium density infill - this is just reducing our green spaces and not achieving sufficient housing capacity so it is a lose-lose. The FDS emphasises urban density, but we don't see developers investing in urban intensification over (more lucrative?) 'future urban' projects in e.g. Warkworth, Drury, etc. We read that intensifying existing urban areas with good connective infrastructure is the priority, while 'focusing growth mainly on the nodes of Warkworth & Pukekohe". But you can't have both. The FDS also states how "the good health of the natural environment is a fundamental condition to the well-being and resilience of rural areas (and) plays a key role in water quality and biodiversity". It talks of 'thriving rural economy and people's quality of life', the need for 'resilience of rural communities', the 'resilience and wellbeing of rural Māori communities in the rural periphery' and so forth. Yet the goal is to develop greenfield areas, turn existing rural communities into commuter dormitories and eradicate farming remnants and genuine rural character, creating 'countryside living'. The FDS mentions a bit of a conflict here, but suggests nothing to resolve this. We see hypocrisy and poor planning that benefits no one but developers.

2.4. Higher, more dense development with greater amounts of green space & trees around them for everyone to benefit from. The FDS mentions **urban ngahere** four times: how 'Incentivising developers, landowners and communities to create urban ngahere across the city can mitigate climate change impacts' (true), and talks wistfully about the effects of unprotected urban ngahere. Yet the FDS makes no commitment whatsoever to ensure protection, beyond the one ill-defined goal: 'strengthen protection of existing vegetation and encourage or require new planting and ecological connections' under the AUP.

2.5. Covering the whole city in medium density infill covering all our gardens with concrete & roofs will just lead to more flooding, more pollution & lower quality of life for residents.

2.6. The vast majority of growth should occur in existing urban areas. Stop creating new cities on the fringes. It just adds to the congestion and travel times & is poorly served with public transport & other infrastructure.

2.7. Prioritise enhancing town centres in areas like Manukau and Tamaki where investment has been less in the past to improve equitable outcomes. This needs to be prioritised well before Warkworth or Pukehohe.

2.8. Rezone the area around Drury and Pukekohe to prevent urban intensification and loss of our most productive food growing soils. This area is not suitable for development of a satellite town. It is too far out of Auckland, which means provision of adequate infrastructure is more expensive and difficult. Commuting into the city is long and difficult and will mainly be via car. This is unsustainable development and this area should be supported to continue to grow fresh food for Auckland and the high quality soils legally protected in perpetuity. We wonder too how existing floodplains will be managed for the new big Drury development. If solutions were proposed to satisfy the consenting body, we have seen no details, peer reviews or assurances.

2.9. Private plan changes by developers should be opposed by council as they undermine strategic urban planning and are usually for development of greenfield sites outside the RUB and then cost all of us to provide the infrastructure.

2.10. Beware of suppressing economic activity by placing residential units among bars, restaurants, clubs and live music venues. This only leads to conflict (noise complaints), the closure of businesses & the loss of a vibrant night scene for the city. Separate these activities so that they can thrive while not upsetting people trying to sleep! Similarly, in the shift to mixed use, existing character must be taken into consideration. Shops and amenities can't just be enabled to sprout up in existing residential streets: they need to be placed with similar amenities close by.

2.11. Ditto re heavy industry. Needs to be well served by public transport but not too close to residential areas to affect health and quality of life. We are alarmed by the objective - "Enabling housing near employment by extending mixed-used areas to reduce VKT **while protecting light and heavy industries from reverse sensitivity effects**". This is redolent of Victorian slums in England nestling among factories and coal mines. The idea of protection from 'reverse sensitivity effects' (prevent people complaining when heavy industry roars and belches in their residential neighbourhood?) is very disturbing.

2.12. Enhance the connections for using public transport, cycling and walking between home, work, shops and entertainment to reduce reliance on cars and reduce congestion. Without this, the goal to "Support greenhouse gas emission reduction" is hardly worth including. Emissions reduction must be the priority, and is a legal obligation, yet the big focus on development into 'future urban areas' must increase emissions. With a few exceptions, new Rapid Transit networks and electric rail are constrained by lack of budget. The Council's new Regional Public Transport Strategy

only mentions a new rail station at Drury in 2026. Right now only a keen knitter would take the bus:
- From **Pukekohe to CBD**, train with bus takes **1hr 42 mins;** bus takes **2h 28m**; car takes **28 mins**.
- From **Warkworth TO CBD**, bus takes **1hr 30 mins**; car takes about **44 mins**.

2.13. What public transport serves Warkworth? Why is this a node for growth? Where are the employment options locally? This is just going to create more cars coming from the north into Auckland! This is the opposite of sustainable development. The plan creates a big commuter suburb and much higher emissions. With new fast roads to Auckland, the large greenfields area from Warkworth to Matakana will fill up with housing. Matakana village will grow exponentially, with high pressure for expansion into the protected natural areas between Matakana and the coast on the north, east and south. In the Place-Based Appendices, we see, 'Warkworth …serves as a gate-way to the many villages and beaches along the Matakana and Kowhai Coasts'. There are not 'many villages … along the 'Matakana coast' (there is no Matakana coast), just Omaha settlement and Leigh, and 'gateways' to the coast must not be widened. East of Matakana (Tawharanui Peninsula, etc) are many reserves and protected areas. To the north, beaches support endangered seabirds, the dune systems are fragile, and there's limited or no visitor infrastructure. This can never be a tourist destination, and vigilance must be applied to refuse sealed roading out to Pakiri or Te Arai or similar threats

2.14. Encouraging brownfield re-development of existing areas without hazards is the most sustainable way forward. Ensure infrastructure is adequate to support intensification and encourage high intensity development surrounded by lots of green space with trees.

Nature Based Infrastructure

2.15. Support prioritising nature based infrastructure to better respond to climate change, but your list did not include trees! Trees are the best natural infrastructure our city has, with mature trees providing multiple benefits that are well established by literature and worth millions to our cities - and yet they are not protected and are being removed daily in the race to intensify.

2.16. Prioritise and positively encourage nature based infrastructure (retention and planting of trees & green spaces) rather than hard infrastructure in developments. The draft suggests many times that Council intends to do this, and that "A strong policy approach will be set to restore and connect ecosystems and better manage the impacts of growth and development" (stated twice). However, this says very little, as do many of the related aims, principles, visions and goals; for example:
"Development must integrate the natural and built environment;
- integrate nature-based infrastructure;
- integration of well-being and environmental outcomes with housing development;
- Protect and restore the natural environment
- neighbourhoods need to be more sustainable" (we are unsure what this means).
"When investing in infrastructure, AC will prioritise investments (as is relevant) that:
- are nature-based, regenerative and mauri enhancing

- enable local decentralised solutions
- are low or zero emissions and circular in resource use".

There is no sense of what these statements mean in practice, what the outcomes would look like, or by what means they would be assured, if at all. To support such ideals with regulatory intent, they first need to be defined properly. And a *strategy,* needs action points on how goals will be achieved. Unless hard, measurable objectives and realistic pathways are identified for these aspirations, the FDS is only a set of well-meaning 'nice to haves', with no teeth or credibility.

2.17. Aim to achieve the 3:30:300 rule (everyone can see 3 large trees from their home, every neighbourhood has 30% tree canopy coverage, and it's only 300m to your nearest park or green space).

2.18. Tree protection is needed now or we will have lost all the large trees on private land in Auckland within a couple of decades - and we can never get them back. Positive legal protection of trees, historic buildings, character areas must be in place before an area is zoned for intensification, or all these assets will be lost.

2.19. Protecting existing areas of native vegetation and enhancing their scale and health is very important. This is supported by the one Appendix 12 item ("Strengthen protection of existing vegetation and encourage or require new planting and ecological connections"). Yet this could apply to any kind of vegetation, and 'ecological connections' (does this intend to mean ecological connectivity?) too vague to be meaningful. (Ecological connectivity certainly needs to be enhanced and supported by valid research and interventions. But what is mentioned in the RFS does not create confidence.)

2.20. Large trees need protected space in which to grow. These are the trees that provide the services & benefits we need to treat stormwater and air pollution etc. New plantings of trees too close to buildings in new infill developments are pointless as they will never be allowed to grow to maturity & will be removed as soon as they conflict with the buildings - which they are bound to do when planted so close to them.

Avoiding Hazards

2.21. Areas prone to flooding, overland flow, landslips and coastal erosion are avoided and not subject to intensification. No more consents should be issued for development or re-development of properties in areas zoned for flood risk. Prioritise identification of hazards with changes due to climate change the driving factor. Agree that the area around Kumeu should not be intensified and probably should be rezoned to rural. Noting that many investigations to evaluate the severity of hazard risks are still pending – should these evaluations not be done before making place-based assumptions?

2.22. Managed retreat is planned in areas of greatest risk with landowners compensated for moving to other safer areas. Create parks and plant trees to replace housing in areas of risk.

2.23. Do not develop or intensify areas until the required infrastructure to support that level of development is already in place. Otherwise hazards like flooding are increased and may occur in areas not previously considered hazardous due to under capacity of the

stormwater network or congestion of roads if public transport is inadequate.

This Consultation Document

2.24. The FDS consultation document is very hard to read and absorb, and reviewing it was needlessly hard work. Its innumerable headings, subheadings and other formatting devices do not structure the information helpfully but fragment this across the whole so that key points are hard to extract.

2.25. The wording is very long winded, and largely takes very long routes to go a short distance. There is a great deal of repetition, and the bulk of the points made are vague high-level statements of apparent intent, but not ‘strategy’.

2.26. Again, a PDF format is used for a substantial document, even though this software is antiquated, unwieldy and a pain to scroll.

2.27. In the 64 pages of the main document there are 27 large colour photographs, of which only one is arguably illustrative of a point. The document would cost a fortune to print.

2.28. While four ‘scenarios’ for growth are set out on P26, there is no indication that any of these is actually selected. This was confusing, and remains so.

2.29. Eight of the maps are illegible, four are only part-legible, and one key graphic is illegible, owing to insufficient resolution or inappropriate sizing.

2.30. It is our intention soon to discuss with Council staff how documents such as these can be made more user-friendly.

Future Development Plan 2023 #8047

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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?

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?

The Tree Council
Tiakina Rākau • est 1986

Submission by the The Tree Council on Auckland Future Development Strategy 2023-2053

26 July 2023

From: The Tree Council
Contact: Dr Mels Barton, Secretary
PO Box 60-203, Titirangi, Auckland 0642
021 213 7779
info@thetreecouncil.org.nz

1. Introduction

1.1. Thank you for the opportunity to present The Tree Council (TTC)'s submissions on the **Auckland Future Development Strategy 2023-2053**.

1.2. These submissions are made by The Tree Council, an independent, voluntary organisation, a non-profit incorporated charitable society which has been serving the Auckland community since 1986 in the protection of trees and as advocates for the significant benefits and services that our trees and green spaces provide.

1.3. We wish to speak to our submission if that opportunity is provided.

2. Submission

How and Where Auckland Should Grow:

2.1. Auckland should grow upwards, not outwards. No more greenfield development.

2.2. Enable more intensification in areas with good public transport & near town centres, but must be done well.

2.3. Enable more high rise & less medium density infill - this is just reducing our green spaces and not achieving sufficient housing capacity so it is a lose-lose.

2.4. Higher, more dense development with greater amounts of green space & trees around them for everyone to benefit from.

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2.9. Private plan changes by developers should be opposed by council as they undermine strategic urban planning and are usually for development of greenfield sites outside the RUB and then cost all of us to provide the infrastructure.

2.10. Beware of suppressing economic activity by placing residential units among bars, restaurants, clubs and live music venues. This only leads to conflict (noise complaints), the closure of businesses & the loss of a vibrant night scene for the city. Separate these activities so that they can thrive while not upsetting people trying to sleep!

2.11. Ditto re heavy industry. Needs to be well served by public transport but not too close to residential areas to affect health and quality of life.

2.12. Enhance the connections for using public transport, cycling and walking between home, work, shops and entertainment to reduce reliance on cars and reduce congestion.

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Avoiding Hazards

2.21. Areas prone to flooding, overland flow, landslips and coastal erosion are avoided and not subject to intensification. No more consents should be issued for development or re-development of properties in areas zoned for flood risk. Prioritise identification of hazards with changes due to climate change the driving factor. Agree that the area around Kumeu should not be intensified and probably should be rezoned to rural.

2.22. Managed retreat is planned in areas of greatest risk with landowners compensated for moving to other safer areas. Create parks and plant trees to replace housing in areas of risk.

2.23. Do not develop or intensify areas until the required infrastructure to support that level of development is already in place. Otherwise hazards like flooding are increased and may occur in areas not previously considered hazardous due to under capacity of the stormwater network or congestion of roads if public transport is inadequate.

Future Development Plan 2023 #8054

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Your feedback

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

Disagree

Tell us why

Denser, more compact cities do not result in improvements to the natural environment.

Accessible local centres

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

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

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

Other

Tell us why

refer to attached PDF for comment

Avoiding hazards

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

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

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

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

Other

Tell us why

Somewhat agree. Note Denser, more compact cities do not result in improvements to the natural environment and can potentially and inadvertently increase risk

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Other feedback

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

Please refer to attached PDF

Submission to Auckland Council on the Draft Future Development Strategy (FDS)

My name is [redacted]

Address

Date _____

Email [redacted]

Phone

As Auckland resident / Owner of Future Urban Zoned land in Auckland (delete one) I make the following submission in response to an invitation to comment on the Auckland Council Draft Future Development Strategy 2023 (FDS).

I strongly oppose the Council's approach to the FDS which focusses almost all of Auckland's growth in existing areas of Auckland for the following reasons:

1. Brownfields feasible residential capacity of 2.3m houses is highly over-estimated with much of the plan enabled capacity economically unfeasible, and not able to be developed due to limited infrastructure, private restrictive covenants (preventing further subdivision or development), high value existing dwellings, high construction costs (especially for apartments), and lack of market demand for the product.

2. The use of brownfields demolition and redevelopment as the predominant source of land supply is a highly risky strategy that does not provide a resilient supply and limits housing choice by type and location.

3. Infrastructure is already at capacity in brownfield areas including schools, early childhood centres, recreation reserves, hospitals, medical centres, roading, storm water, water, wastewater, and other services and cannot continue to be utilised for 30 years of projected population growth. Costs to upgrade this have not been compared with the same costs complained about in greenfield areas. This will be a budget blow out just like the CRL.

4. Intensification is already taking place in outlying areas of Auckland no closer to the CBD and employment hubs than many current Future Urban locations. Increased density will generate traffic adding further congestion.

5. The FDS ignores the unsatisfied demand for employment zoned land especially land for large footprint buildings. No business capacity study has been published yet no new business sites can be created in brownfields areas. As a result, the price of such land will continue to skyrocket while the FDS completely misses an opportunity to create sustainable residential communities close to new employment areas.

6. The FDS presumes there is no opportunity in ANY FUZ area where development could occur. This shotgun approach wastes expenditure already incurred on infrastructure upgrades. These assets will not be fully utilised if the greenfield land which they service is left undeveloped.

7. Perceived funding constraints should not be a reason to limit greenfield development.

8. Infrastructure triggers to be met before greenfield development are overly conservative and based on the assumption that the entire area is being developed. There is no allowance for smaller scale incremental development.

9. Greenfield developments coped well with the recent rain events in the Auckland region and provided for resilient communities compared with many of the existing brownfield areas. **Hobsonville Point** has been cited as a good example. Many brownfield areas earmarked for growth cannot cope with additional intensification.

10. The FDS deferral of zoning creates severe financial hardship for FUZ landowners who purchased in reliance on the 2017 FULSS. The U-turn signalled by the draft FDS will significantly damage investment confidence for years to come, sending developers to more development friendly cities.

11. It is unconstitutional to embed the FDS in the Regional Policy statement and through that mechanism remove the ability of landowners to apply for and achieve private plan changes.

12. It is most likely illegal for this policy to be introduced without extensive consultation and public hearings.

The outcome I would like to see from my submission is:

- Future urban area development should be allowed for in all FUZ zones where piped services capacity exists or can be provided by developers, especially where nearby business land is included to enable people to live near work and have housing choice.
- Defer the FDS by at least two years until Plan Change 78 is resolved and an accurate assessment of **feasible** brownfield capacity is completed including business land.
- A capacity study is done on infrastructure (particularly three waters) in brownfields areas to ensure it can handle future residential growth and the costs are in fact less than the per unit cost in greenfield areas.
- Initiate alternative funding models to fund infrastructure and allow incremental development to occur in FUZ areas where the infrastructure can be upgraded to allow for it.
- Assess current greenfield development opportunities on a much finer grained basis enabling at least some land to be developed immediately under a revised FDS.

Signed _____

[redacted]

Dated _____

Future Development Plan 2023 #8070

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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

This is a qualified agree. Please see comments in attached submissions

Accessible local centres

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

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

Agree

Tell us why

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Agree

Tell us why

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

Agree

Tell us why

Other feedback

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

Please see attached submission.

#8070

Gracechurch Drive Ratepayers Group Feedback in Response to Auckland Council Future Development Strategy 31 July 2023 (includes prior submissions concerning potential for development in Gracechurch Drive, Inchinnam Road and Browns Lane East Tamaki).

1) **Principles for Growth and Change.**
   a) We support the 5 principles outlined in the draft strategy together with their sub principles. These seem to us to be the appropriate overarching strategic approach to enable to achieve its goal of the provision of 200,000 additional residential households for Auckland over the next 30 years.
2) **Growth Scenarios.**
   a) The 4 scenarios on page 26 of the strategy appear to be presented as alternatives. As currently defined, we submit that none of the scenarios individually yet capture all the necessary options required to achieve the 200,000 households within the principles for growth and change. We believe that selecting any one alone would preclude elements in another scenario from contributing. For example, the boundaries between existing urban and other areas may not be appropriate to current day information, experience and knowledge given the significant time lapse from when they were established (decades in some instances).
   b) While we recognise the budgetary constraints of infrastructure investments and the need to target these to best, effect we believe that it is too early to effectively disregard an opportunity which may have the potential for providing a significant number of residential households for Tamaki Makaurau.
   c) For example, the Spatial Approach adopted in the strategy appears to confine growth primarily to existing urban areas with limited potential outside the areas currently defined as such. It is also not clear which of the 4 scenarios this spatial approach is linked to as the focus on existing urban areas is included in several of the scenarios. Some further clarity on this would be appreciated.
   d) In addition, figures 12 and 14 lack boundary detail at street level to be able to identify which streets fall within the existing urban area and those which fall outside it. Given our group is on or near this boundary, we request further detail regarding these to be able to make an informed response.
3) **Constraints on Development.**
   a) We support the constraints on development outlined in the strategy namely,
      i) Natural hazard constraints
      ii) Land Use Capability (LUC) Class 1, 2 and 3
      iii) Natural environment constraints
      iv) Natural heritage constraints
      v) Cultural heritage constraints .
   b) However we believe that it will be inevitable that some areas where constraints are identified will need to be the subject of development to achieve the number of household units required under the plan. Increasing Auckland's housing stock by 200,000 or an additional 34% over 30 years is a significant step increase and unprecedented in Auckland's history. Therefore to achieve this, we believe decisions must be pragmatic and development should not be precluded in areas where constraints are not major and can be managed without significant compromise to the strategic principles in the plan.
   c) Once again we believe that the detail in figures 4-8 lack sufficient detail for ratepayers to identify which hazards or combination of hazards apply particular property or neighbourhood. Therefore we request further detail regarding these to be able to make an informed response.
4) **The Gracechurch Drive, Inchinnam Road and Browns Lane Large Lot Zone.**

a) In 2022 our group made submissions to Council to change the zoning of this area to enable subdivision into smaller lots. These submissions are attached.
b) The Council's Planning Division responded by saying that their focus at that point was on implementing the Government's legislation on intensification in Auckland. The Council deferred further consideration of our submission until zoning decisions including the Large Lot Zones were considered along with the review of the Unitary Plan, due to commence in 2024 and be completed for announcement in 2026.
c) The Auckland Future Development Strategy document to which this response is directed seems to be the overarching document under which these zoning decisions will be made. Hence our interest in having our voices heard at this point.
d) The submissions we made for a zoning change appear to us to be compelling and if approved would provide a minimum of 400 additional residential households. Such a development also appears to be on the information currently available to us entirely consistent with the Goals and principles contained in the Auckland Future Development Strategy.
e) In addition the strength of our submissions has increased following Cyclone Gabriel and several other significant weather events which have occurred in Auckland over the last 12 months. This area emerged essentially unscathed by any flooding or land subsidence, thus establishing a significant record for resilience to the impact of climate change which is a major hazard identified in the Auckland Future Strategy.

5) Additional Information now sought in respect of the Auckland Future Development Strategy.

a) Please confirm the boundaries of the existing urban area in figures 10 and 12 in so far as they impact Gracechurch Drive, Inchinnam Road and Browns Lane Large Lot Zone. In other words is this area currently within or outside the existing urban area. Can you provide a more detailed map at street level to illustrate this boundary.
b) Please advise which of the constraints identified in the Future Development Strategy and shown in figures 4-8 apply to the this area. Please provide the detail on these constraints and whether they are assessed as more or less constrained and/or high or low risk. Can you provide a more detailed map at street level to illustrate the exact areas of each constraint..
c) Please advise which of the 4 scenarios or combination of scenarios is the basis for the Auckland Future Regional and Local Spatial Responses and Scales.
d) The requests in paragraphs 5(a) (b) and (c) are made pursuant to the Local Government Official Information Act 1987.

6) In view of the fact that some of the information contained in the Auckland Future Development Strategy is unclear as outlined in these submissions, and the fact that we have made a request for further information to clarify how the Strategy may impact our neighbourhood, we also request a further opportunity to address this further information after it is received and after the 31 July 2023 deadline for feedback.

Yours sincerely,

Peter Doone

Gracechurch Drive Ratepayers Group

#8070

The Howick Board
Auckland City Council.
19 April 2022.

Submissions in support of urgent services upgrade and further zoning intensification along Gracechurch Drive and Inchinnam Road Flat Bush.

1) Introduction.

a) Gracechurch Drive between Browns Lane and Jeffs Road comprises "semi-rural" in the main 2-acre lifestyle blocks with some subdivision into smaller blocks (now restricted to 5000 sq. m). It is zoned Large Lot Residential with the sub designation Countryside Transition Precinct I.

b) Residents in this area have been talking with each other about the condition of our street, the impact of higher intensification (including apartment blocks) and the cost of our rates lately and we thought it was about time that we put our combined concerns to the local board with a number of recommendations to resolve the issues identified.

c) This submission addresses the following areas of concern:

i) The lack of urban amenities including effective storm water drainage, the provision of mains water supply from some to all properties, proper footpaths and streetlights.

ii) In particular the lack of storm water drainage causes frequent flooding along the road during heavy rainfall and resultant damage to properties and the environment.

iii) Mains wastewater connections are only available for some of the properties and while connections for other properties are close by they have not been brought up to property boundaries to enable a connection.

iv) The level of intensification (up to the highest density residential Apartment zone) right next to the Large Lot Zone (the lowest density residential zone) with the result that many residents are no longer able to enjoy our previous "Lifestyle" character of living. The changes in the area since the rules for the Large Lot Zone were developed in 2003 is huge. The areas to the south and west were farmland at that time and we now have large blocks of apartments backing onto Large Lot properties.

v) Roading and footpaths are substandard for the significant foot and motorized traffic now being experienced, leading to significant safety risks for residents and people moving through the area.

vi) The relatively high levels of rates charged in the area without the provision of these services.

vii) The provision of these services will have a cost and we propose that this be met from zoning rule changes which will permit further subdivision down to 1000 square metres generating additional rates and development contribution revenue to meet those costs.

viii) We further submit that these changes can be managed to maintain and in in fact enhance the environmental issues identified by Council when the zoning rules were established and to provide a much safer environment for residents.

2) Provision of Services and Flooding.

a) Storm water drainage in this Area of Grace church Drive is rudimentary at best. While Storm water drainage off the road is connected into the Councils storm water system

but age has made it ineffective. About 6 years ago the drains in the lower parts of the area started blocking up whenever we had a large down pour of rain causing flooding to the roads and some surrounding properties.

b) From time to time contractors have turned up to fix the blockage but their efforts have also been ineffectual and they have had to keep coming back. The storm water drains are still getting blocked as illustrated in a video sent to Mike Turinsky from 21 July last year.
c) The torrent of flood water washing down our properties erodes the land away behind the concrete wing wall and under our fences. You can see the damage in the video.
d) When the flood gets across the road, it starts gushing down around the large pine trees on our neighbouring properties and the water is undermining tree root systems. Since the flooding has started there have been 3 or 4 large trees come crashing down with 2 of them totally blocking the road.
e) One of our local residents Andrew Barge has a digger and has himself cleared much of the damage caused by the flooding on several occasions, thus saving the council considerable expense.
f) The use of septic tanks was identified as a risk to the environment in the 2003 Flat Bush Plan yet after nearly 20 years only some of the properties are connected to the mains wastewater system. Connections are relatively close to other properties and work to connect the whole area should be an urgent priority for Council.
g) On the new district plan, our road is classed as a local road, not a rural road. The road would be a lot safer if it was up to the standard the district plan shows. We have no curbing, shoulder or channelling and no street lights and no footpath on one side, no mains water and a storm water drainage system that can no longer cope and is causing danger to traffic on the road, damage to properties and harm to the environment through erosion.
h) Drainage in Gracechurch Reserve is also a problem. It has a relatively steep gradient in places and drains directly into the neighbouring properties on the southern side and the stream which runs through those properties. Flooding and erosion into these properties and the stream are issues during heavy rain.
i) Each year the council is increasing our rates without addressing the causes of the problem and failing to provide us with effective storm water drainage, a safe road, street lights, footpaths and town supply water, all benefits enjoyed by ratepayers in neighbouring streets.
j) Here's an example of why we are upset. A neighbour has to replace his irrigation line on his septic which will cost thousands and then the council expect them to pay for waste water!!!

3) Source of Funding to Provide Essential Services to the Gracechurch Drive area between Browns Lane and Jeffs Road.

a) Recognising there is a cost to provide these services we recommend that the council raise the money by letting us subdivide to approx.1000 squares meters per section. This would raise significant finance from additional rating as well as development contributions from the subdivided lots. Then we would be helping with the formation of a new road, improved and effective storm water drainage, street lighting and additional footpaths.
b) It would also make our properties 'fit in' with the surrounding area where there has been significant intensification in neighbouring streets which range from Mixed Suburban to Terraced Housing and Apartment Zones. This has resulted in sizeable apartment and terraced housing development in close proximity to this area including backing right onto some of our supposedly Lifestyle Blocks. This in turn has seriously impacted the Countryside "Lifestyle" we used to enjoy to an extent

that the designations “Countryside” and “Lifestyle” are no longer valid descriptions of the area.

4) **Background to Building Intensification in Adjacent Streets.**
   a) The first development in Gracechurch Drive occurred in the 1970's when the majority of Lots in were divided into the traditional 2-acre (0.8 hectare) Lifestyle Blocks.
   b) In 2003 the Manukau District Plan was amended to enable lots of 8000 sq. metres in Gracechurch Drive, Inchinnam Road and Browns Lane to be further subdivided into lots to a minimum of 2000 sq. metres but averaging a minimum of 4000 sq. metres.
   c) A Substantial factor in maintaining the 4000 sq. m limit was the lack of wastewater connections to the properties in this area and the concern held by Council of the impact of septic tanks on the environment.
   d) At that time there was no "urban development" in Flat Bush. This was about to change however and development mushroomed through the development that became known as the Flat Bush Development Plan. This was incorporated into the Manukau District Plan around 2008. The Gracechurch Drive Area was designated as *Flat Bush Sub-precinct I (Countryside Transition).*
   e) In 2016 these provisions were incorporated into the Auckland Unitary Plan (Part I412 "Flat Bush Precinct") almost in their entirety. In an ironic exception however, the subdivision rules were changed to allow only subdivision of lots into 5000 sq. metre lots, effectively halting further subdivision in Gracechurch Drive due to lot sizes being in the main only around 0.8 hectares. Prior to this some 13 of the 68 properties in Gracechurch Drive had been subdivided into 2 lots. The zoning in the area became designated under the Unitary Plan as a "Large Lot" Zone but retained its "Countryside Transition" designation.

5) **Flat Bush Sub-precinct I (Countryside Transition). Key Provisions:**
   a) This Sub-precinct relates to land within the upper catchment area and alongside the many streams and waterways in the Sub-precinct. The Sub-precinct further functions to protect and enhance the natural environmental qualities found within the Sub-precinct, while providing for appropriate countryside living.
   b) The landscape quality, water and soil resources, native forest, wetlands and open space amenity values of this highly visible landscape in the mid to upper reaches of the Flat Bush basin along with the spaciousness in these low density residential sub-precincts is maintained and enhanced.
   c) Require lower densities and site coverage to create spacious rural and transitional urban development with reduced visual impact.
   d) Require riparian planting of native species within the conservation and storm water management area to: maintain and enhance water quality and aquatic habitats, existing native forest and to create spacious rural and transitional urban development with reduced visual impact.
   e) Retain significant native vegetation, including riparian vegetation and protect the ecological and landscape values associated with the area.

6) **Housing Intensification in Adjacent Streets**
   a) In direct contrast with the provisions relating to the Gracechurch Drive Large Lot Residential Zone the adjacent streets have been designated either Suburban Residential or Apartment and Terraced Housing. In particular the following areas are zoned for Apartment and Terraced Housing either adjacent to or very close to the Large Lot properties in Gracechurch Drive and Inchinnam Road:
      i) Carlos Way which runs off Gracechurch Drive and backs onto properties in Inchinnam Road and are very close to properties in Gracechurch Drive
      ii) 1 Gracechurch Drive. Now an 18 block Apartment Complex.

iii) 2 Gracechurch Drive. Another large Apartment Complex now incorporated into Stancombe Road but directly on Gracechurch Drive.
iv) Wyon Way. Runs off Stancombe Street but backs onto properties in Inchinnam Road and is also very close to properties in Gracechurch Drive.
v) Stancombe Street, numbers 124-132. These are further apartment blocks and back onto Carlos Drive. Number 136 is also in close proximity.

b) It should be noted that of the 5 Auckland Residential Zones the Large Lot Zone is the least intensive housing area requiring 5000 sq. metres per lot, the Apartment and Terraced Housing Zone is the most intensive requiring only 50 sq. metres or less per accommodation unit; some 100 times more intensive. The Mixed Suburban Zone is the third most intensive requiring only 400 sq. metres per lot which is 12.5 times more intensive than the Large Lot Zone. The Mixed Suburban zone is about to become even more intensive with the implementation of the recent Government legislation requiring more intensive housing development in major city residential zones. It is noted however that the Large Lot Zone is specifically exempted from this legislation.

c) Actual Development in Carlos Drive and 124-136 Stancombe Road.
i) This is a confined area but now has a total of 14 apartment blocks built with a total of 420 apartments. Individual blocks range from 16-44, averaging 35 apartments per block.
ii) The size of apartments are dominating and have a visual impact totally inconsistent with a “Countryside” and Lifestyle Block living experience. In addition however, the architecture and quality of some of the apartments is poor and unsightly. In particular the apartments at 1 Gracechurch Drive are of ugly (unsightly?) architecture and constructed of low quality building materials, not at all in keeping with the high quality architecture and building materials used in the rest of Gracechurch Drive.
iii) In addition 2 large apartment blocks at 132 Stancombe Street have been closed and blanketed in plastic sheeting for “remediation” for at least 2 years with no sign of an early completion. They are less than 10 years old and must have serious construction flaws.

7) The Case for Intensification now:

a) The result of the above intensification has totally undermined and effectively destroyed the former “Countryside Living” or a Lifestyle experience in nearby Gracechurch Drive and Inchinnam Road. This is despite the fact that the Unitary Plan has designated the area specifically for this purpose. Key negative impacts are caused through:
i) The provision of the highest density residential zone (Apartment and Terraced Housing) right next to the lowest density residential zone (Large Lot). The contrast is huge in terms of visual impact, additional noise, foot and vehicular traffic.
ii) Just looking at the apartments, there are 420 apartments in a residential space of approximately 6 hectares. In contrast there are more than 80 houses in a residential space of approximately 70 hectares in Gracechurch Drive Inchinnam Road and Browns Lane. The difference in building density is massive.
iii) The apartments range from 1 to 4 bedrooms. Taking a conservative average of 4 people per apartment there is a village of more than 1600 people living in the same confined area. Allowing for a higher density of 5 residents per larger property (although this is doubtful as there are many retired residents and fewer families) this makes a total of approximately 350 people (less than ¼ of the

apartments) in more than 10 times the residential area. Like the building density, the population density difference is also massive.

b) The impacts of this intensification now being experienced by residents in Gracechurch Drive and Inchinnam Road are:
   i) Significantly increased traffic on Gracechurch drive. Auckland Transport should have a record of this. Gracechurch Drive is now being used not only by its nearby residents but also as an alternative route to avoid Stancombe Road congestion and to gain more direct access to Highbrook and its motorway access point.
   ii) There are two schools increasing the traffic at both ends of Gracechurch Drive.
   iii) There has been a significant increase in public use of both Point View and Gracechurch Reserves on Gracechurch Drive with increased traffic, dangerous road-side parking, increased foot traffic and no pedestrian crossing.
   iv) In turn this has reduced the safety of both motorists and pedestrians in Gracechurch Drive through not only much higher traffic density but also excessive speeding, dangerous overtaking and lack of streetlights. Many serious crashes have occurred in recent years.
   v) Police have recognised the problem and now employ occasional speed cameras and alcohol checkpoints on Gracechurch Drive.
   vi) The noise inevitably created by large numbers of people living nearby and travelling through the reserve is significant and frequently drifts over towards residents in the area including loud music.
   vii) Gracechurch Reserve has also become subject to gatherings of young people who illegally consume alcohol, listen to loud music and race unregistered and unnumbered motorcycles on the reserve. The resultant noise is very intrusive to residents. In addition there are no rubbish bins in this reserve with the result that quantities of rubbish including bottles, cans and thrown away takeaway food and containers are frequent, unsightly and dangerous occurrences.
   viii) The result of this intensification is that residents are no longer able to enjoy "Countryside Living" one of the core stated objectives of the Flat Bush Plan. The Plan recognised the need to preserve this experience for residents and catered for it by describing the (now) Large Lot Zone as a " "Countryside Transition" zone between rural and urban zones. Transition in this context should mean a gradual change from one zone to another so as not to intrude to any great degree to existing lifestyles enjoyed in each residential zone. This should mean that the zones between rural and urban should be gradually increased so as not to destroy an existing zone's lifestyle. In other words the zoning next to Large Lot ought to be a single house zone, followed by mixed housing suburban, followed by mixed housing urban followed by Apartment and Terraced Housing. In other words residential zones gradually increasing in intensity from lowest to highest. In this case the highest density zone is right next to the lowest density zone which is totally inconsistent with the "transitional" designation of the lowest density zone.
   ix) It should be noted that this is in marked contrast to a similar area in Point View Drive where at the southern end there is a gradual transition of properties from Large Lot Zone to Single House Zone to Mixed Housing Suburban Zone. There are no apartments anywhere near this area.
   x) This is how the Zone Planning ought to have occurred in the Gracechurch Drive Countryside Transition Zone but it was not. The need to preserve the Countryside living experience of Gracechurch Drive and surrounding area as required in the Unitary Plan seems to have been totally lost in the implementation of the Flat Bush Development Plan.

c) In effect, the Flat Bush Development Plan, adopted in the Unitary Plan has failed in one of its major stated objectives, to the significant detriment of the lifestyle experience of residents in Gracechurch Drive and Inchinnam Road.
d) It is not only the physical impacts described above local residents are experiencing. Current subdividing and building rules are depriving residents of the ability to develop their own properties. For example Large Lot owners require 10,000 sq. metres in order to subdivide once. And then can build on only a footprint of 400 sq. metres (only 8% of the land). In neighbouring Mixed Suburban Zone subdivision is possible into 400 sq. metre lots and in the Apartment Zone, 1200 sq. metres may be developed into 24 apartments on more than 80% of the land three stories high. Another example is Wyon Way where on no more than a hectare there are now 16 individual lots some of which have three story Terraced Style Housing.
e) This has led to a significant disparity in the respective value of land in the differing zones. For example the land at number 32 Carlos way of approximately 4,000 square metres now has a rating valuation of $4.65m while a similar sized lot in Gracechurch Drive has a land RV of $1.65m only 35% of the value of the adjacent zone.
f) This is not to say that such intensive developments are not justified. They are a core strategy and will continue to be a reality in Auckland. It is simply that they ought not to be right next to a Countryside Living Lifestyle area as they are totally inconsistent with each other.

8) Management of Environmental Issues.

a) Along with maintaining an appropriate Countryside living environment, the protection of the natural environment was given a high priority in the objectives and policies the Flat Bush Development Plan (refer I412.3.3 of the Unitary Plan. Briefly summarized they included:
   i) Requiring activities, buildings and structures to retain significant native vegetation and protect the ecological and landscape values of the area
   ii) Requiring riparian planting of native species within the conservation and storm water management area to maintain and enhance water quality and aquatic habitats and prevent stream bank erosion.
   iii) A specific issue environmental issue identified in these respects was the risks posed by the widespread use of septic tanks in the area.
b) Progress on environment issues since the plan's implementation:
   i) Many properties are now connected to Council Wastewater systems and remaining connections should be relatively easy to make available so there should be no need to use septic tanks into the future.
   ii) In the limited cases of subdivision since that time riparian planting has been required as part of the resource consent process in the relevant conservation and storm water management areas on private property. In addition, erosion during construction has been managed through special bunds and soil containment methods.
   iii) The majority of the native trees and plants in the Gracechurch Drive area are on Council land including Point View Reserve and Gracechurch Reserve and are managed by Council.
   iv) Private Storm water systems required as part of subdivision consent are very effective. They are based on storage and trickle into the environment via perforated drainage. This poses very effective erosion control and have a much lower impact on erosion than actual rainfall falling on the ground.
   v) While the area is not yet on mains water supply, the use of water storage tanks has a positive impact on erosion and the environment due to the fact they

capture significant rainfall which is utilized within households before the greywater being drained into the Council waste water system where it is currently available. This reduces the amount of actual rain which falls on the ground. This is not an insignificant contribution. A case study in point is 14 Gracechurch Drive. Water usage within the household and minor dwelling is 1000 litres per day or more than 360,000 litres per year. The tanks store 60,000 litres and surveys have established that it take 150mls of rain to fill completely from the roof. 360,000 litres therefore requires 900mls of rain to store which means almost 90% of the annual rainfall which falls onto the roof is captured and does not contribute in any way to ground erosion or drain into the Council's storm-water system which is already under pressure. In addition, it takes pressure off the City's scarce mains water supplies which have been a problem in recent years. Subdivision into smaller lots has the potential to increase these contributions.

vi) In contrast the biggest risk for soil erosion in the area is the ineffective street storm water runoff system described at the outset of this submission which causes frequent widespread flooding including eroding the roots of trees and causing the trees to fall. This is the most urgent environmental issue to address rather than continuing to restrict subdivision.

vii) It should also be noted that the 16 properties built in Wyon Way referred to in paragraph 7 (f) above and zoned for Apartments and Terraced Housing are built right next to one of the major exposed waterways flowing from Point View Reserve through properties in Gracechurch Drive and Inchinnam Road. The Council do not appear to have been concerned about the environmental impact and erosion potential of this high-density housing area which is right next to the Large Lot Zone properties and one of its main waterways.

9) Contribution of further subdivision to Government and Council Objectives for growth in residential properties in the area.

a) The original Flat Bush Plan recognised that the wider Flat Bush area was one of the last "Greenfields" areas within which to develop to house the rapid growth of Manukau City. The strategy was greater housing density and to go up rather than out where possible. This approach has now also been mandated by Government in its recent legislation requiring Councils to provide for higher density houses in most residential zones.

b) Restricting the Gracechurch Drive and Inchinnam Road and Browns Lane area to one house to 5,000 sq. metres has resulted in the construction of very large houses for one household with the possibility of a minor dwelling only of 65 Square metres. Otherwise there is a danger that the property will be undercapitalized. An example is 17 Gracechurch Drive where the house is 721 sq. metres over 3 levels. This is enough for 4 x 4-bedroom houses catering for 4 large families instead of 1 to 2. In addition, it defeats one of the purposes of the current restrictions of having minimally intrusive buildings to maintain the character and landscapes of the area. There are also other examples along Gracechurch drive.

10) Summary:

a) The most serious environmental risk to the waterways through erosion is the substandard road storm water system which needs an urgent upgrade.

b) The current aged and inefficient road storm water system in Gracechurch Drive is frequently overwhelmed in heavy rain causing flooding, dangerous road conditions and environmental damage to the surrounding area through erosion and tree roots being undermined causing trees to fall.

c) Such an upgrade coupled with completion of the partially implemented mains wastewater system, removes the environmental risk of further subdivision in the area. The need to upgrade the wastewater system was identified in 2003 planning documents yet nearly 20 years it is only partially implemented despite connections being available nearby.
d) Other policies and rules in place (e.g. riparian planting and building erosion control requirements) are capable of managing the environmental risks of further subdivision to 1000 sq. metre lots in Gracechurch Drive Inchinnam Road and Browns Lane.
e) The impacts from the high level of housing permitted in areas neighbouring on Gracechurch Drive and Inchinnam Road have effectively destroyed the 'Countryside Lifestyle' living previously enjoyed by residents. This impact is permanent and cannot now be reversed. This is highly unfair and inequitable for residents who moved here and invested their money for a 'Countryside Lifestyle' which is no longer able to be enjoyed
f) Such further subdivision will provide significant benefits including:
    i) Providing the funding to upgrade the current storm water system, create proper footpaths and street lighting thereby improving resident and commuters and pedestrians' safety on the road.
    ii) Contribute to Government and Council goals to provide additional housing in Auckland.
    iii) Enable residents to further develop their properties providing resources to move to an area of genuine Countryside living.

11) Next Steps.

a) We are looking for a commitment from Council to fix these issues raised in this paper and request a timeline when we can expect them to be completed. Of particular urgency is the upgrade of the services requested to be made available to us especially fixing the storm water system and extending mains wastewater connections to all properties.
b) There is a process already established by Council for the implementation of Government Legislation providing for higher density housing to most residential zones in Auckland. The new provisions must be implemented by August 2022. While the legislation does not include the Large Lot Zone in its mandatory requirements, given the evidence cited above, we are requesting Council to consider the question of higher housing density in the Gracechurch Drive, Inchinnam Road and Browns Lane Large Lot Zone now long with the other intensification issues. Not to do so would inevitably make a bad situation for us now much worse with increasing intensification around us.
c) The process and the people established for implementing the legislation would be the ideal framework for this work although it is recognised that the timeframe to complete this for the Large Lot Zone may extend beyond August 2022.
We would like agreement from the Council to incorporate this higher density housing for Gracechurch Drive and Inchinnam Rd.

12) Consultation.

a) To date 14 households have responded to these issues. The only concern expressed by one household has been the potential for rates to rise for existing properties if further subdivision was permitted. Other feedback has been very supportive of this submission.
b) Many of the properties are tenanted with owners living in other areas and further efforts are being made to contact a wider group for feedback.

Thank you for time and consideration.

Future Development Plan 2023 #8073

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

Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

Please see our submission attached

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

Please see our submission attached

Avoiding hazards

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

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

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

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

Agree

Tell us why

Please see our submission attached

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

Please see our submission attached

Other feedback

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

Please see our submission attached

Richmond Residents' Association Submission on Auckland Council's Auckland Future Development Strategy 2023 – 2053

31 July 2023

1. The Richmond Residents' Association thanks Auckland Council for the opportunity to submit on its draft Auckland Future Development Strategy 2023 – 2053 (**Draft Strategy**).

Who we are and who we represent

2. The Richmond Residents' Association is reponsible for the governance and management of a growing, vibrant medium density community located in southern part of Mount Wellington, near the suburb of Ōtāhuhu. Our development is boarded by Panama Road, Hillside Road and Ryburn Road, and is adjacent to Mount Wellington Highway. This was once the site of Te Apunga o Tainui / Mc Lennan Hills before it was quaried in the 1950s – 1970s and became the flat area that our community is now built on.

3. Our relatively new development commenced in 2017 and is due to complete in the final half of 2023. By bringing this development to completion our developers, the Wiltshire Group, will have added c.500 high quality apartments and terraced homes to Auckland, a city desperate for quality housing solutions in central locations.

4. We are a diverse community, and we love this emerging area that we call home.

Housing developement in our surrounding area

5. It is clear that Auckland is changing quickly as it densifies, and the Richmond Development is part of that densification. It is also clear that our southern part of Mount Wellington is experiencing densification at faster rates that other parts of the city. This is due to factors including 1.) the zoning of our area as a 'Residential – Terraced Housing and Apartment Buildings Zone'; 2.) Auckland Council's Development Strategy 2050[1] which focuses on compact development; 3.) the large number of residential sections which are suitable for high and medium density development in our area; and 4.) the Medium Density Residential Standards and other regulatory reform.

6. Our expectation is that the population of this area will increase significantly in the coming years. Anecdotally, there are currently three significant housing developments under construction directly on the boarder of our development, including one large apartment building with 59 dwellings. Based on current consents, our zoning, and the development trends, we know there will be more similar developments on the horizon adding further density to our area.

Our comments on the Draft Strategy

7. We have reviewed the Draft Strategy from the perspective of how it will impact our community, and have the following feedback for Auckland Council to consider:

Supporting communities to live, work and play locally

7.1. We note that Principle 1 of the Principles for Growth and Change states "A compact urban form is a critical requirement for low carbon and climate resiliant urban development".[2] Sub-principle 1(b) goes on to argue that intensification alone is not enough, "Auckland also needs neighbourhoods with

[1] https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/auckland-plan/about-the-auckland-plan/docsprintdocuments/section-8-development-strategy.pdf

[2] P.16 Draft Future Development Strategy, Auckland Council, May 2023

centres at their hearts to enable people to live locally and access most of their daily needs by active modes and public transport."[3] We agree with this view.

7.2. Unfortunately however, the infrustructure surrounding our development is in terrible condition. The footpaths are often broken creating safety issues for pedestrians using prams or wheelchairs. There is no cycling infrustructure at all, and due to the industrial nature of some parts of Mount Wellington, we often share the road with large dangerous trucks. This makes cycling dangerous[4] and untenable for many people. We do have bus connections to Sylvia Park and Ōtāhuhu train stations, however those connections are not always frequent or reliable.

7.3. These factors taken together mean that our residents do not have realistic options to take active modes of transport, or public transport as a reliable alternative to driving. We note the Draft Strategy lists Sylvia Park Bus improvements to commence in the decade starting from 2033 – these plans are insufficient to respond to the urgent transport and infrustructre needs of our community.

7.4. We support Principle 1 for growth and change, particularly sub-principles 1(b) (strengthen accessible, walkable and mixed-use neigbourhoods) and 1(c) (bring jobs and homes closer together). However, we do not believe the Draft Strategy implements or supports Principle 1 by prioritising the necessary funding allocations to suburban infrustructure. Our experience is that Auckland Council has allowed rapid intensification in Mount Wellington with no additional funding to upgrade our local infrustructure. The has resulted in increased congestion, increased carbon emmissions, and community frustration.

We are requesting Auckland Council to amend its Draft Strategy to make explicit that suburban infrustructure which supports Principle 1 will be funded.

Investing in suburban communities that are accomodating densification

7.5. We note Principle 3 and its sub-principle 3(a) explains that Auckland Council will take a regional view to infrustructure investment and costs and "...prioritise growth and infrustructure investment closer to the city centre and sub-regional nodes within the existing urban area"[5].

7.6. We are concerned that our community will not fall within these catchments, despite providing Auckland with significant high quality, medium density housing within 12 kms of the city centre, and 2.3 kms of the Sylvia Park Mall and train station.

7.7. We are particularly concerned about Auckland Council's prioritisation of investment closer to the the city centre. Historically this approach has led to low density suburbs in heritgage protected areas recieving significant infrustructure upgrades, while south Auckland suburbs like Mount Wellington host rapidly growing communities without equivalent or even adequate infrustructure investment. Our communities matter, and we deserve to be prioritised for quality infrustructure upgrades.

We are requesting Auckland Council amend its Draft Strategy to place greater emphasis on investing in suburban communities like Mount Wellington, where densificiation has and will continue to occur.

[3] P.16 Draft Future Development Strategy, Auckland Council, May 2023

[4] Last year Mount Wellington was sadly the location of a cyclist death on Marua Road. Although this is at the northern end of Mount Wellington, the nature of the infrustructure is similar to what we have in our area on Carbine Road and Mount Wellington Highway. See more information on the cyclist death here.

[5] Page 19, Draft Future Development Strategy, Auckland Council, May 2023

Building on existing resilience demonstrated through the recent Auckland floods

7.8. We note that resilience is a key theme in the Draft Strategy, referenced througout the document. In reference to the development of future urban areas, the Draft Strategy rightly states that the Auckland storms of January and February 2023 have demonstrated the dangers of flooding and highlighted areas of risk.[6] Fortunately, the Richmond Development has been profiled as an example of where comprehensive flooding infrustructure creates communities resilient to flooding.[7] Our community was largely unaffected by these historic floods due to the world class infrustructure developed by the Wiltshire Group. We believe this resilience is another strong reason for Auckland Council to ensure our growing community in the south of Mount Wellington be prioritised for further infrustructure investment.

We are requesting Auckland Council to build on exisiting resilience by comitting to infrustructure investments in suburban communities, like ours in Mount Wellington, in its Draft Strategy.

Conclusion

8. Thank you for considering our submission, please contact [redacted] if you have any further questions or feedback.

Yours faithfully,

[redacted]

Committee Chairperson
Richmond Residents' Association

[6] Page 39, Draft Future Development Strategy, Auckland Council, May 2023
[7] See the profile from Stuff here.

Future Development Plan 2023 #8075

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Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

Please see attached submission.

Accessible local centres

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

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

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

Agree

Tell us why

Please see attached submission.

Avoiding hazards

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

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

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

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

Agree

Tell us why

Please see attached submission.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Please see attached submission.

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.

AK Have Your Say

Aktive Submission

Auckland Council – Future Development Strategy

Introduction

Thank you for the opportunity to make a submission on the Auckland Council Future Development Strategy ("FDS"). The growth and development of Tāmaki Makaurau over the next 30 years will have an impact on not only where people live, but how they live their lives, how they get to work, play and everything in between and most importantly on their health and wellbeing. The importance of planning for this growth effectively cannot be overstated.

We already know that historical growth patterns and infrastructure investments have resulted in inequitable access to community facilities, open spaces, services and resources and that any future planning needs to ensure access to this community infrastructure is equitable for the entire population.

Aktive exists to enable and inspire Aucklanders to lead more active lives through physical activity and has a particular interest in the health and wellbeing of our people and how the built and natural environment can facilitate positive outcomes in these areas.

We are a charitable trust established to support Tāmaki Makaurau becoming the world's most active city. We are a key strategic partner of Sport NZ, Auckland Council and major grant-makers and funders. With this support, Aktive is able to invest into a range of delivery partners, organisations and projects that aim to get more people active in Tāmaki Makaurau, with a focus on tamariki and rangatahi in low participation communities, girls 10 to 18 years, Māori, Indian, Chinese and Pacific ethnicities and those living with disabilities.

We know being physically active has a positive effect on society, improving the wellbeing of people and communities and contributing to the hauora (health and wellbeing) of our young people. There is a significant amount of research demonstrating the benefit of play, recreation and sport:

- Physical activity brings $372 million of healthcare savings for Tāmaki Makaurau and contributing to 279 fewer deaths[1];
- Participation in sport brings 74.3 million hours of meaningful, positive social interaction each year[2];
- Evidence is emerging that underspending on facilities leads directly to lower participation levels[3];
- Sport and recreation operating spend has a direct and significant correlation with participation levels[4];
- Physical activity has a positive link to improved educational outcomes, leading to an increased $8.6 million of GDP growth for Auckland[5];
- Physical activity brings $210 million of savings to Auckland through increased productivity levels, due to reduced sickness costs[6].

[1] ACW Auckland City Report 2018, Portas Consulting. Available at: https://aktive.org.nz/resource-hub/insights-research/
[2] Ibid
[3] Ibid
[4] Ibid
[5] Ibid
[6] Ibid

We believe that the direction shown by the FDS helps to support our vision of making Tāmaki Makaurau the world's most active city. It will do this by focusing growth in existing areas, making active transport a viable option to get around and ensuring facilities and open spaces are more accessible to greater numbers of people. However, we want to ensure that health and wellbeing are at the core of this future development.

Summary of our Submission

Having reviewed the Auckland Future Development Strategy 2023-2053 Consultation Draft document, the overview document and the feedback form, we make the following comments:

1. Greater emphasis needs to be placed on how existing infrastructure will be used to cater for growing populations within the existing urban areas
2. Greater emphasis needs to be placed on the role and social value of community infrastructure
3. There needs to be an acknowledgement that there is an existing shortage in infrastructure to support physical activity and that there will need to be both an increase in the quality and/or capacity of existing infrastructure as well as the development of new infrastructure to cater for the growing and diverse population of Tāmaki Makaurau
4. There needs to be more detail around how the FDS will address disparity and achieve equal outcomes for our communities in terms of access to community facilities and open space
5. Health and well-being outcomes need to be better defined and brought to the forefront throughout the document
6. Planning and pricing policy need to ensure that no communities are left out, leading to even greater inequity
7. Community facilities and open spaces should be acknowledged as key pieces of resilient infrastructure that can be used to respond to climate events
8. The impacts of climate change need to be considered when designing new facilities and the wider network of community facilities.

Response to the Consultation Document

We acknowledge the over-arching challenges set out in the consultation draft and agree that historic patterns of "hard and soft" (not that we support this terminology) infrastructure investment, or lack thereof, have resulted in inequitable levels of accessibility and the distribution of goods, services, employment and resources. This is particularly apparent in our sector with the location and quality of sport and recreation facilities and fields.

We accept that infrastructure is costly and the Council's capacity to provide infrastructure is not unlimited, however as urban density increases investing in the facilities which build strong and resilient communities is essential. We believe that Auckland Council must work with Kainga Ora and the Ministry of Education to invest in and provide community sport and recreation infrastructure to meet current and future needs.

We agree that with intensification as the basis for accommodating growth, infrastructure investment must provide a sustainable foundation for communities to thrive and that good design includes the quality of the city structure and the design of public places and spaces for people and nature, as well as building and house design. We support the principle that investments are prioritised in the parts of the region that need it most – to address disparities and serve communities of greatest need. The approach helps informs the work that we do.

We support Principle 1(b) to strengthen neighbourhoods with centres at their hearts to enable people to live locally and access most of their daily needs by active modes and public transport and that strong centres must incorporate open and green spaces. This supports an active population and connects communities.

We support Principle 2(b) to prioritise integrated, nature based, regenerative and resilient infrastructure and prioritising investments that are nature-based, regenerative and mauri enhancing. Recent climate events in Tāmaki Makaurau have reinforced the importance of green open spaces as assets to absorb stormwater and flow waters. Our green spaces serve multiple functions and should be viewed with a wider lens than just areas of sport and recreation. We agree that the total economic value in decision making should consider social cultural and environmental outcomes and should take a whole-of-life approach. We also submit that the Social Return on Investment approach is a critical lens.

We support Principle 3 (b) to make the best use of existing infrastructure and have seen great outcomes achieved through the regional field sand carpeting programme (which we would like to see accelerated). However, this Principle also creates challenges where there are existing shortfalls of facilities or field access. It is not clear from the consultation document how this shortfall can be addressed through the proposed approach to urban intensification.

Purchasing new open space in existing urban areas is challenging and generally cost prohibitive – how this is to be achieved needs to be considered and addressed. A series of small pocket parks does not create a useful open space network, limits use options and has operational cost implications.

We strongly agree that as Tāmaki Makaurau intensifies and private outdoor space diminishes, the quality, function, distribution and accessibility of public open space becomes increasingly important and that, although the primary function of public open space is often recreation or social utility, it can also be used as detention basins to protect communities from hazards and to protect areas of biodiversity or natural and cultural heritage. While consideration of development infrastructure investment usually focusses on the pipes and roads, it is important to note that open space, playing fields and sport facilities is the infrastructure which creates and sustains communities. Without this infrastructure "quality" is lost from the "quality compact" approach to growth.

Response to Consultation Questions

Focusing growth

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

Aktive supports focusing growth on existing urban areas as this has the ability to enhance accessibility for residents. This will enable people to use more methods of transport such as walking, cycling, and public transportation to access services, community facilities and open spaces, leading to a more active population.

The view to address disparities in infrastructure and services by taking a regional and whole of society view to planning decisions is very important as we know that there is already a significant disparity across different areas due to different levels of investment from legacy councils.

The FDS notes that a key consideration when looking at spatial environments is the insufficient integration of well-being and environmental outcomes with housing development. We fully support this consideration, particularly where it states: "*Wider sustainability and community well-being outcomes are as important for long term success, but have not had the same level of attention as increasing the number of dwellings.*"

Aktive supports the overall approach for development within existing urban areas. We would also like the following to be considered:

Existing infrastructure
Greater emphasis needs to be placed on how existing infrastructure will be used more effectively and will cater for growing populations within the existing urban areas. Aktive agrees with Council's approach that "Development in the existing urban area supports the most efficient use of infrastructure for the least monetary cost over time." However, there is no reference to how this existing infrastructure will need to significantly increase its capacity to cater for higher use. The FDS simply references the fact that much of the infrastructure required already exists and that renewal of infrastructure can be accommodated at marginal cost without considering the upgrade of this infrastructure.

We know that there is already a significant shortage when it comes to recreation and sport facilities in Tāmaki Makaurau. In terms of indoor courts there is currently shortfall of around 30 courts with limited opportunities for expanding the use of existing facilities. The demand for indoor court facilities will increase rapidly, with projections indicating a 20 per cent to 25per cent increase by 2033 and an 18 per cent to 34 per cent increase by 2043[7]. Similarly, evidence indicates that many field-based sports clubs are already operating at capacity within their existing facilities, with demand likely to grow significantly This shortage of suitable sports fields is particularly pronounced in central and south Auckland.

To ensure that the growing population in existing urban areas is catered for, there will need to be both an increase in the quality and/or capacity of existing infrastructure (including fields) and the development of new infrastructure to cater for the increased population. We also need to make sure that this infrastructure is fit for purpose, i.e. as noted

[7] Auckland Indoor Sports Court Facility Plan, Visitor Solutions, 2017

previously developing pocket parks to address the demand for open space or small community halls to address the demand for community facilities do little to create good outcomes for sport and recreation.

We would like to see the importance of community facilities and open spaces better reflected in the FDS.

Addressing disparities
Aktive would also like to see more detail around how the FDS will address disparity and achieve equal outcomes for our communities. The FDS talks to how different communities experience different on-the-ground outcomes due to historic growth patterns and how disparities in our communities need to be addressed. For Aktive this is obvious when it comes to investment and support for play, recreation and sport and we are working strategically with our partners to help address these disparities with targeted approaches across the region.

We would like to see in the FDS specifically how the spatial planning will not only address current, but also historic groups that have traditionally been disadvantaged such as Māori, Pasifika, disabled people, older adults and others.

Wider outcomes
As stated above, the FDS acknowledges that community well-being outcomes are as important as the number of dwellings developed. We would like to see these outcomes better defined and brought to the forefront throughout the document to ensure any planning considers the importance of physical activity and health.

We believe that one of the most important factors to be considered in planning, that has a significant impact on health and well-being, is the availability and accessibility of community facilities and open spaces. These facilities have significant impacts on mental health, physical activity, social connectedness and the prevention of chronic diseases.[8]

Accessible Local Centres

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

Aktive supports Council's focus on development near local centres to ensure people have easy access to all their required services and facilities.

Enabling people to live locally and access most of their daily needs by active modes or public transport is essential. Active forms of transport lead to improved mental health and prevention of chronic diseases as well as being an effective way to integrate physical activity into everyday life for the majority of the population, at little personal or societal cost.[9]

While planning for people to live locally is ideal, we still need to ensure that this planning is supported by sufficient services and resources to enable this. As stated above, we already know that there is a significant shortage of recreation and sport facilities across the region and that existing facilities are aging and requiring significant investment to be fit for purpose.

Aktive supports the overall model for development near local centres and submit that community facilities and open spaces, including recreation and sport facilities need to be prioritised as **core infrastructure** that needs to be considered and developed alongside the increase in density as opposed to retrofitted afterwards.

Resilient infrastructure

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

Aktive supports the approach of prioritising infrastructure that is resilient and regenerative and responds to the impacts of climate change.

[8] UN-Habitat and World Health Organization (2020). Integrating health in urban and territorial planning: A sourcebook.
[9] Healthy Transport = Healthy Lives, 2012, British Medical Association

Recreation and sport facilities play a crucial role in promoting development that avoids hazards and prioritises resilient and regenerative infrastructure. These facilities act as multifunctional spaces that not only provide opportunities for physical activity and community engagement, but also contribute to the overall resilience of our urban areas. Facilities such as sports fields, playgrounds, golf courses and other open spaces, when properly designed and managed, can serve as valuable components of hazard mitigation strategies. They can be designed to act as detention basins capable of temporarily storing excess stormwater during heavy rainfall events.

By incorporating features such as permeable surfaces, swales, and bio-retention areas within these facilities, they can effectively manage stormwater runoff, reduce the risk of flooding, and alleviate pressure on traditional drainage systems. This integrated approach to infrastructure ensures that these facilities not only provide safe and enjoyable spaces for physical activity but also contribute to the overall resilience and adaptability of our communities.

It is also critical that community facilities are appropriately future proofed against the impacts of climate change. This relates both to new facilities designed with reduced embodied carbon construction and with sustainable operational principles, such as energy efficiency and water reduction. As evidenced by the recent climate events in Auckland it is important that community facilities are located in areas that are not subject to natural hazards or in high-risk areas.

The loss of critical indoor facilities in Tāmaki Makaurau following the January 2023 flood event has had a long-term impact on activity levels. As the frequency of extreme weather events increases, we must ensure that we have a resilient network. The design and make-up of the network is also critical to reduce people's reliance on private transport.

Other feedback

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

Future Urban Areas

The FDS proposes that there will still be a need to develop new urban areas. We agree with the coordinated approach identified and that sequencing and timing are crucial to ensure development is undertaken efficiently.

However, most of the triggers for identifying when future urban areas can be developed are transport and wastewater related. This ignores the multitude of other factors that need to be developed to ensure any future urban areas are suitable for people to live in. We think that community facilities and open spaces need to be added as a "Other factor to consider" when reviewing potential future urban areas.

Conclusion

Aktive generally supports the direction of the Auckland Council Future Development Strategy and its vision for a vibrant and active Tāmaki Makaurau. We believe that inclusive communities can be created by developing in existing urban areas based around local centres with appropriate investment to address shortfalls and inequity. We know that giving people more options for transport including walking and cycling and easier access to community facilities and open spaces will lead to greater levels of physical activity.

A critical element to ensuring this planning and intensification is done correctly is to consider health and well-being as a key outcome for development as opposed to simply the number of dwellings. Infrastructure, in particular community facilities and open spaces, are integral in enabling people to live healthy, active lives.

We want it to be acknowledged that there are already disparities and shortages in the level of provision of facilities and resources across the region and that for recreation and sport facilities there will not only be a need to invest into existing facilities to ensure they have capacity but also to invest into new facilities to cater for growth.

We know that the future is going to be difficult with our adaptation to fighting climate change as this will have a huge impact on where and what can be developed across the region. We want to ensure that in this process that those who have already disadvantaged are not ignored and are included in planning to stop further inequity. We also want to see recreation and sport infrastructure as being an important aspect in addressing climate change through cutting edge and creative development.

#8075

We welcome the ongoing opportunity to work together with Auckland Council to ensure that Tāmaki Makaurau is able to plan to cater for a growing and diversifying population, to provide opportunities for everyone to have an active life and to realise the vision of Auckland becoming the World's Most Active City | Tāmaki Makaurau – te tāone ngangahau rawa o te ao.

Future Development Plan 2023 #8080

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Please refer to attached submission

Accessible local centres

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

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

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

Other

Tell us why

Please refer to attached submission

Avoiding hazards

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

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

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

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

Disagree

Tell us why
Please refer to attached submission

Resilient infrastructure

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

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

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

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

Other

Tell us why
Please refer to attached submission

Other feedback

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

Please refer to attached submission.

WINTON

DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY SUBMISSION

TO:	Auckland Council ("**Council**")
SUBMITTER:	Winton Land Limited ("**Winton**")
SUBMISSION ON:	Draft Auckland Future Development Strategy ("**Draft FDS**")

Summary

1. The Draft FDS proposes significant changes to the plans for how and where Auckland is to grow over the next 30 years. Winton is actively involved in land development in Auckland (including resource consent and private plan change processes) and is a regular and sophisticated user of the Resource Management Act 1991 ("**RMA**"). We have successfully developed over 500 ha of carefully planned high quality residential neighbourhoods throughout New Zealand and the Auckland region.

2. Winton is also the owner of a large block of land at Cosgrave Road, Takaanini which is zoned Future Urban ("**Takaanini Land**") which has been identified by the Council as "development ready" in the next couple of years. Winton is currently in the pre-application phase of a private plan change request to live zone the area.

3. Winton opposes the Draft FDS and considers it fails to comply with key requirements of the National Policy Statement on Urban Development 2020 ("**NPS-UD**").

4. The Draft FDS:

   (a) does not provide for "sufficient development capacity" as that term is defined in the NPS-UD and places too much reliance on intensification anticipated to be enabled through Plan Change 78 ("**PC78**"). This is despite PC78 being in its infancy and the outcomes of that process not yet determined. The Draft FDS:

      (i) overestimates the capacity of Auckland's existing urban areas to meet expected demand on the basis of an incomplete and inaccurate evidence base; and

      (ii) underestimates the need for greenfield development to meet Auckland's expected housing and business land demand over the next 30 years;

   (b) has not been prepared on the basis of an adequate and complete Housing and Business Capacity Assessment ("**HBA**");

   (c) does not provide for well-functioning urban environments by failing to adequately consider the infrastructure constraints within existing urban areas, and the significant opportunities that greenfield development can provide for well-integrated development;

Level 4, 10 Viaduct Harbour Avenue, Auckland 1010
PO Box 105526, Auckland 1143

(d) does not give adequate consideration to the available funding mechanisms for new greenfield development and creates confusion and uncertainty as it is inconsistent with Auckland's current infrastructure strategy, which anticipates investment in new and expanded infrastructure; and

(e) applies overly blunt principles to development in areas subject to natural hazard risks and takes an overly cautious approach to potential natural hazards.

5. Preparation of the Draft FDS has been rushed. More work must be undertaken by Council to properly consider which areas of Auckland are appropriate for future growth. More work is also required to ensure that there is sufficient development capacity for both housing and business land provided in the region in the next 30 years. The adverse implications of the Draft FDS are significant.

6. Winton seeks:

(a) the Draft FDS consultation period under s83 of the Local Government Act 2002 be extended to allow further work to be undertaken by Council to identify areas appropriate for intensification;

(b) meaningful consultation be undertaken with the developer community in relation to the Draft FDS such that key principles be agreed including in relation to sufficient land being released at the appropriate time to cater for expected demand, infrastructure provision and management of natural hazard risks;

(c) that Council pause the current programme on the Draft FDS and delay the adoption of the Draft FDS until further work has been undertaken by Council to identify areas appropriate for intensification; and

(d) the Takaanini Land be clearly identified in the final Auckland Future Development Strategy as a committed growth area that is development ready in the 2023-2027 time period.

NPS-UD

Key statutory requirements

7. The NPS-UD provides the legal basis for the Draft FDS.[1] The Draft FDS must be prepared every 6 years and in time to inform, or at the same time as, Auckland's next long-term plan,[2] which we understand is being updated in 2024. Once the FDS is prepared, Council will be required to have regard to it when preparing or changing RMA planning documents.[3] On that basis, it has the potential to significantly influence RMA decision making processes.

8. The NPS-UD also sets out a prescriptive criterion of sources of information that must be considered in informing the Draft FDS. This includes the most recent applicable HBA, consideration of different spatial scenarios for achieving the purpose of the FDS, the relevant long-term plan, infrastructure strategy, and other relevant strategies and plans, feedback from this consultation, and every National Policy Statement or relevant national policy required or issued by legislation.[4]

1 NPS-UD, Part 3, Subpart 4.
2 NPS-UD, clause 3.12(1).
3 NPS-UD, clause 3.17.
4 NPS-UD, clause 3.14.

9. These requirements need to be considered against the overarching purpose and direction of the NPS-UD, which is to ensure there is sufficient development capacity for housing and business land to meet expected demand in New Zealand. The NPS-UD's first objective is to provide for well-functioning urban environments, which 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. This is fundamental to the application of the NPS-UD and development of the Draft FDS.

Providing for sufficient development capacity

10. The Draft FDS must set out how Council intends to provide at least "sufficient development capacity" for housing and business land to meet expected demand in the short term, medium term and long term.

11. For housing, capacity must be provided to meet expected demand in both existing and *new* urban areas.[5] In order to be considered as "*sufficient*" development capacity, it must be plan enabled, infrastructure ready, feasible and reasonably expected to be realised and meet the expected demand plus the appropriate competitiveness margin.[6]

12. However, the overall effect of the Draft FDS will be to fundamentally slow down, defer or remove future development areas as being identified for future urban development which is entirely inconsistent with the purpose of the NPS-UD and purpose of the Draft FDS. The approach suggests that, at least until the 2030s, the Council thinks that the vast majority of Auckland's expected demand for housing and business land can be successfully managed solely within existing urban areas.

13. This approach appears to be based on a number of assumptions and an evidence base that is fundamentally flawed and incomplete. For example:

    (a) The Draft FDS estimates that the total plan enabled net housing capacity for Auckland is 2,345,500 (which includes proposed PC78 enabled residential capacity with all qualifying matters applied).[7] This is an over-reliance on the outcome of a plan change process that is not yet determined. It cannot also be said that the capacity enabled through PC78 is all "feasible" given realisation of that capacity requires existing buildings to be demolished and a site redeveloped. Realisation is largely dependent on a landowner wanting and having the capability to maximise the development potential of their property.

    (b) The Draft FDS has been prepared on the basis of an inadequate and out of date HBA. The HBA does not include any assessment of business land capacity and contains different capacity assumptions to those used in the Draft FDS.

14. By removing and delaying some areas for development from future urban zoning and increasing the reliance on infill developments through the Draft FDS, Council has placed far too much reliance on the capacity of the region's brownfield areas to provide sufficient development capacity, as required under the NPS-UD.

15. The capacity assumptions relied on by Council in preparing the Draft FDS significantly overstate the position. By removing greenfield areas earmarked for future urban development, housing supply and type will be constrained which will escalate the price. This will result in housing becoming more

5 NPS-UD, clause 3.2(1)(a) and (b).
6 NPS-UD clauses 3.2(2) and 3.3(2).
7 Draft FDS at page 29 and Appendix 4.

unaffordable for a significant portion of the community, which is exactly what the NPS-UD seeks to avoid. The primary purpose of the Draft FDS should be to ensure there is sufficient development capacity in the short, medium and long term. In its current form, it does not do this.

16. Natural hazards work is also still being undertaken by Council following the Auckland floods and Cyclone Gabrielle. Until this further investigation has been completed, there is a significant element of uncertainty as to whether there will be sufficient development capacity in Auckland in the long-term. It cannot be the case that greenfield areas are being precluded for future development on the basis of natural hazard risks now, while brownfield areas continue to be investigated. These risks (and corresponding impacts on where development capacity is enabled) must be considered holistically.

17. A range of areas identified for intensification in PC78 are subject to challenge, including to enable a lower level of intensification (or no intensification) on the basis of qualifying matters. Significant parts of PC78 are also currently on hold.

18. Precluding or delaying areas for future development in the absence of an accurate and reliable evidence basis is unreasonable and inappropriate and will also have significant consequences both for housing and business land availability (and cost) in Auckland.

Approach to managing natural hazard risks

19. The Draft FDS has also placed a strong emphasis on avoiding further growth in areas exposed to hazards. Although Winton is supportive of an approach to generally avoid areas of high natural hazard risk, there are a range of existing protections and incentives on landowners and developers to ensure that any future development occurs in a way that appropriately manages those risks.

20. Council's approach of blacklisting areas that could potentially be developed on the basis of natural hazard risks, is overly blunt and ignores the multiple engineering solutions available to developers to manage those risks. As long as new development is accompanied by appropriately designed and tested engineering solutions paid for by the developer, it is not necessary, nor is it appropriate, to constrain development based on a perception of a flood risk or geotechnical risk.

21. Council must consider other incentives on developers to build high-quality developments that address, manage and mitigate hazards (for example, building standards, or insurance). In addition, further work on a consistent national approach to managing development in hazard risk areas, and managed retreat is also expected to occur through the Climate Change Adaptation Act. It is critical that the Draft FDS does not preclude or undermine that future work by constraining development in the interim.

Infrastructure funding constraints

22. Under the NPS-UD, development capacity is considered "infrastructure ready" if:[8]

    (a) in relation to the short term, there is adequate existing development infrastructure to support the development of land;

8 NPS-UD, clause 3.4(3).

(b) in relation to the medium term, there is adequate existing development infrastructure available to support the development of land or funding for that adequate development infrastructure has been identified in the long-term plan; and

(c) in relation to the long term, funding for adequate development infrastructure has been identified in the long-term plan, or the development infrastructure to support the development capacity is identified in the Council's infrastructure strategy.

23. The Draft FDS appears to be based on the premise that infill development utilising existing infrastructure is cheaper than greenfield development and to be preferred in the short, medium and long term.

24. This is simplistic. Infrastructure investment is a complex challenge that requires a good understanding of development needs in the short, medium and long term. While new greenfield developments may have higher infrastructure costs upfront in the short term, those are then paid for over time through development contributions, which can provide more significant and cost-effective benefits over the longer term. Just recently the Council changed its development contributions policy to provide for a longer-term horizon for funding of infrastructure in high priority growth areas – it has the tools available to provide this infrastructure in greenfield areas with prudent planning.

25. In many cases, brownfield development can be subject to the same, or more significant infrastructure constraints. Many brownfield areas are already over-capacity, which can impact the feasibility for future upgrades (and therefore, tying into the development capacity of an area), which should urge Council to exercise more nuanced decision-making in relation to infrastructure investment.

26. Aside from cost, the Draft FDS also fails to recognise the other significant benefits that greenfield development capacity can provide, including:

(a) opportunities for integrated, master-planned developments that better utilise land for open space and community areas, active transport modes, and other engineering;

(b) opportunities for new infrastructure that is better designed to deal with flooding and extreme weather events; and

(c) provision of a greater variety of housing choices to meet the needs of the communities, which is a key focus in the NPS-UD. Similarly, the needs of industrial and other commercial development will be very different to other residential land uses and arguably face greater supply challenges through infill while also exacerbating reverse sensitivity effects on existing uses.

27. While the Draft FDS has an outlook purportedly over the long-term with regard to its principles around infrastructure funding, Auckland's most recent infrastructure strategy clearly anticipates significant investments in infrastructure are required to meet the demands of our growing communities. This signals that long-term development capacity is infrastructure ready, despite the Draft FDS suggesting otherwise. Given the region's most recent funding decisions have accounted for long-term new infrastructure investment, the approach under the Draft FDS is misaligned with Auckland's long-term plan, infrastructure strategy, and the key purpose and requirements of the NPS-UD.

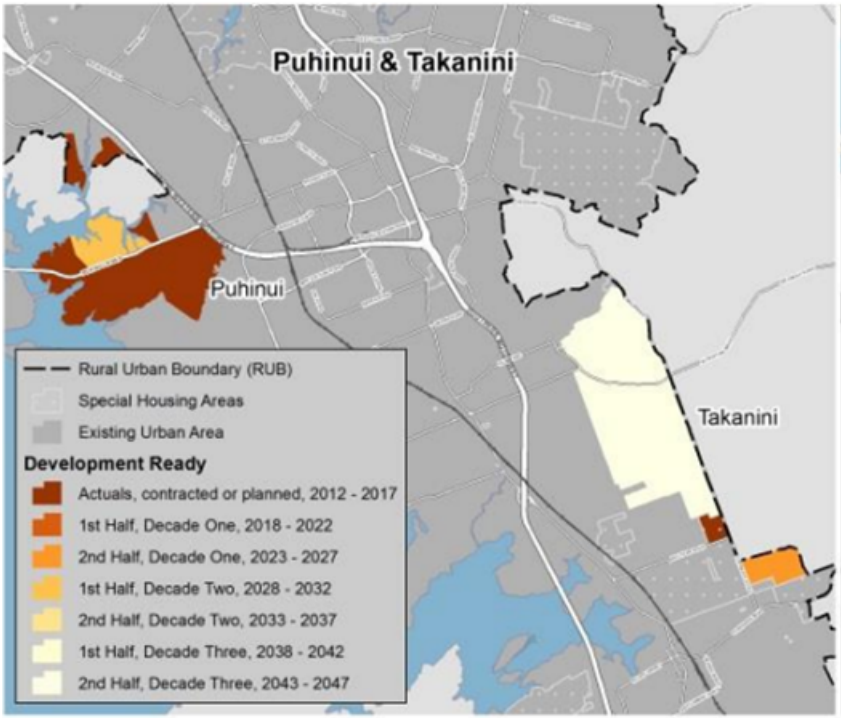
Well-functioning urban environments

28. As currently proposed, the Draft FDS does not give effect to the objective of the NPS-UD to provide for well-functioning urban environments. The Draft FDS fails to appropriately consider options that achieve well-functioning urban environments, in terms of providing for a range of housing options (both brownfield and greenfield developments), and the ability to ensure new development is well integrated with infrastructure, community spaces and green open spaces, and active transport modes. There is naturally less scope to achieve this integration through infill, as development operates within the constraints of existing, and often poorly planned, urban areas.

29. The NPS-UD expressly recognises the need for a combination of greenfield and brownfield development to provide for well-functioning urban environments and different housing options. In achieving the purpose of the NPS-UD, the Council must undertake a balanced consideration to greenfield development and take into account the significant opportunities these can provide to achieving well-functioning urban environments over the medium and long-term.

Takaanini Land

30. Winton's Takaanini Land is currently zoned Future Urban in the Unitary Plan. It is also identified in the Future Urban Land Supply Strategy ("**FULSS**") as being "development ready" by 2023-2027:



31. Winton's Taakanini Land is shaded orange in the above image from the FULSS.[9]

32. Astoundingly, the Draft FDS proposes to delay the timing for the Takaanini Land being "development ready" to 2050+ based on the timing for Mill Road and the frequent transport network. Not only is

9 Future Urban Land Supply Strategy (Auckland Council, July 2017) at page 16.

this inconsistent with the requirements in the NPS-UD, it also represents a major departure from Council's long-standing plan to live zone this area between 2023 and 2027.

33. Winton is in the process of lodging a private plan change request with Auckland Council to rezone the Takaanini Land ("**Plan Change**"). The Plan Change seeks to rezone the majority of the land to be MHU, consistent with the proposed surrounding residential zoning. The Plan Change also provides for a neighbourhood centre to service the community, provides a block of open space and extension of the Awakeri wetlands conveyance channel and provides protection for the high-pressure gas line which passes through the Takaanini Land.

34. The Plan Change land will therefore be subject to the full AUP standards around subdivision, trip generation and transport controls, management of natural hazard risk, stormwater management including capacity and quality. The Plan Change includes a funding commitment to build and implement the conveyance channel and landscape it to the same standards as the Stage 1 Awakeri wetlands and includes a commitment to transport upgrades within the Cosgrave Road/Mill Road corridor.

35. The most significant infrastructure commitment by Winton to the Takaanini Land is the proposed delivery of the conveyance channel which is designed to manage flood prone issues within the Takaanini East area. The Council has completed a detailed stormwater management strategy for the area, which identified the appropriate method of control was through construction of a stormwater conveyance channel. Stage 1 of the Awakeri wetlands has already been completed and the land for stage 2 has been designated prior to Winton owning the Takaanini Land.

36. The Takaanini Land is development ready in all aspects. However, the Draft FDS proposes to substantially defer the long-standing commitment by Council that the Takaanini Land will be live zoned between 2023 and 2027. This has been proposed without any consultation with Winton. Through the Draft FDS, the Council has not provided any logical or rational justification for deferring the Takaanini Land for development in the timeframes originally committed to.

37. It is nonsensical that an area that has long been planned for and invested in be proposed to be deferred for urban development until 2050 and beyond, particularly against the backdrop of a willing developer with a Plan Change ready for lodgement to advance that area's development and fund any remaining necessary infrastructure. To defer the timing for this land being development ready is completely contrary to the key drivers of the NPS-UD and purpose of the FDS.

Broader implications of the Draft FDS

Integrity of Council planning documents undermined

38. The Draft FDS has significant adverse financial implications for developers across the region and fundamentally undermines the confidence Winton has in the integrity of Auckland Council planning documents.

39. Developers have significantly invested in land in reliance on Auckland Council planning documents like the Auckland Plan 2050, the FULSS, the AUP and Structure Plans. These planning documents have been well tested, subject to extensive public consultation (and in some cases a hearing before independent commissioners) and are based on a suite of expert evidence. The same cannot be said for the Draft FDS.

40. To now preclude or defer areas for future urban development through the Draft FDS represents a fundamental departure from long-standing Council policy and severely undermines the integrity of Council's other long-term strategy and planning documents. This has huge implications for the future development of Auckland, which relies on private developers purchasing land in reliance on Council's planning documents to meet expected housing and business demand.

Changes to the RUB should remain a district plan level control

41. Winton also has concerns with the suggestion by Council through its approach that the Rural Urban Boundary ("**RUB**") should be a *regional* rule and therefore only able to be modified effectively by the Council through a public plan change. This approach was tested through the proposed AUP hearings process, and the Panel found that a plan change to the RUB should remain a *district* matter and it was inconsistent with the RMA to do otherwise:[10]

> "While the desire of the Council to achieve planning certainty about growth over the next 30 years is understandable, the Panel does not consider that it promotes the purpose of sustainable management to lock in land supply and infrastructure decisions over such a long period when the environment and the needs of people are constantly changing. Resource management planning needs to be responsive to the dynamic processes of urban growth. While providing certainty can promote efficiency by reducing future process requirements, overly or unnecessarily rigid application of rules can be a hurdle or barrier to efficiency by creating additional costs.
>
> […] A Rural Urban Boundary that is permanent for the next 30 years, subject only to the unilateral power of the Council (or a Minister) to move it, would not provide sufficient planning flexibility to adapt to changing circumstances."
>
> "For these reasons the Panel recommends that the Rural Urban Boundary should remain as a method in the Unitary Plan but should be moved from the regional policy statement to the district plan. […]"

42. Council's track record of implementing plan changes under the FULSS is also very limited. The only plan change Winton is aware of where Council has promoted giving effect to the FULSS was in Whenuapai. However that plan change was subsequently withdrawn. Plan changes giving effect to the FULSS are essential to provide for growth in Auckland. Ultimately, the Council relies heavily on private developers to initiate and fund these plan changes.

Engagement and procedural concerns

43. Clauses 3.15(f) and 3.16(2)(a) of the NPS-UD state that when preparing or updating a draft FDS, or when undertaking a review of an FDS, the local authority must engage with "*the development sector (to identify significant future development opportunities and infrastructure requirements)".*

44. Auckland Council has not engaged with Winton on the Draft FDS and it appears that the consultation with the development sector has been very limited. A lack of extensive "development sector" knowledge has significantly skewed the Council's understanding of the availability of urban land now and in the foreseeable future to service the needs of Auckland. Winton considers the consultation on the Draft FDS has been rushed, flawed and not in compliance with the requirements of the NPS-UD.

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

45. There has also been insufficient information and time available to properly give consideration to a proposal of such significance. The Draft FDS involves a fundamental change from the long-established growth pattern that has been in existence since 2011. This major change to existing long-established policy is being done with very limited public consultation prior to the proposal being published.

46. Further time (beyond the July 31 extension) is required, given the further work Council needs to do in order to demonstrate the Draft FDS is achieving the criteria of the NPS-UD.

47. Winton wishes to speak to this submission.

Duncan Elley
General Manager – Project Delivery

Future Development Plan 2023 #8082

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Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

If good infrastructure - and if not good investment made this is best practice for the environment- but please no more intensive building on wetlands and high risk areas

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

Good for community connection and environment

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?

Please enforce conditions of resource consents and particularly ensure Watercare comply with their NDC and work towards in a timely way improving the water quality in Hobson Bay

#8082



Clean Water Waitaramoa/Hobson Bay – A Pipe Dream?

Event information 5 August 2023.

Waitaramoa/Hobson Bay ("the Bay") has arguably the most sewage contamination without a solution in all of Aotearoa. Currently there is a serious risk of illness if people have contact with the water in any of the six streams, and in the harbour up to 48 hours after .05mm- 2.0mm of rain. (Map source public notice November 2022)



The best information available for when there has been less than .5mm- 2 mm of rain over 48 hours is shown in the following map (Source public health notice November 2022)



Since 2020 a tailored Public Health Notice has been created annually however each year there is little change in the overall safety of the water and the associated maps. There has only been a limited effort to inform the public of the issues nor have has there been a substantive attempt to share timely solutions and/or provide a solidly funded plan to reduce this contamination. This is in an area where residents advocate strongly for cleaner water and local boards and their Councillor backed the Water Quality Targeted Rate as well as increases to it.

Despite this unwanted sewage contamination, the Bay continues to be a place of great cultural, social and ecological significance and is a treasure to be looked after feeding into the Waitematā Harbour. It is bordered by three special ecological areas and one Marine and is widely enjoyed by the public. It is surrounded by walkways, sports fields and recreational facilities for children and adults. The Bay has a concentration of preschools and schools near the water, and numerous water access points including two popular swimming beaches. In 2013 the comprehensive OLB Hobson Bay Action Plan 2013 was developed which includes important detailed background information however implementation of the plan has been limited even though is still widely supported. Reducing and, in time, fully eliminating the sewage contamination will enable current and future generations to safely engage with the Bay.

Points of Interest.

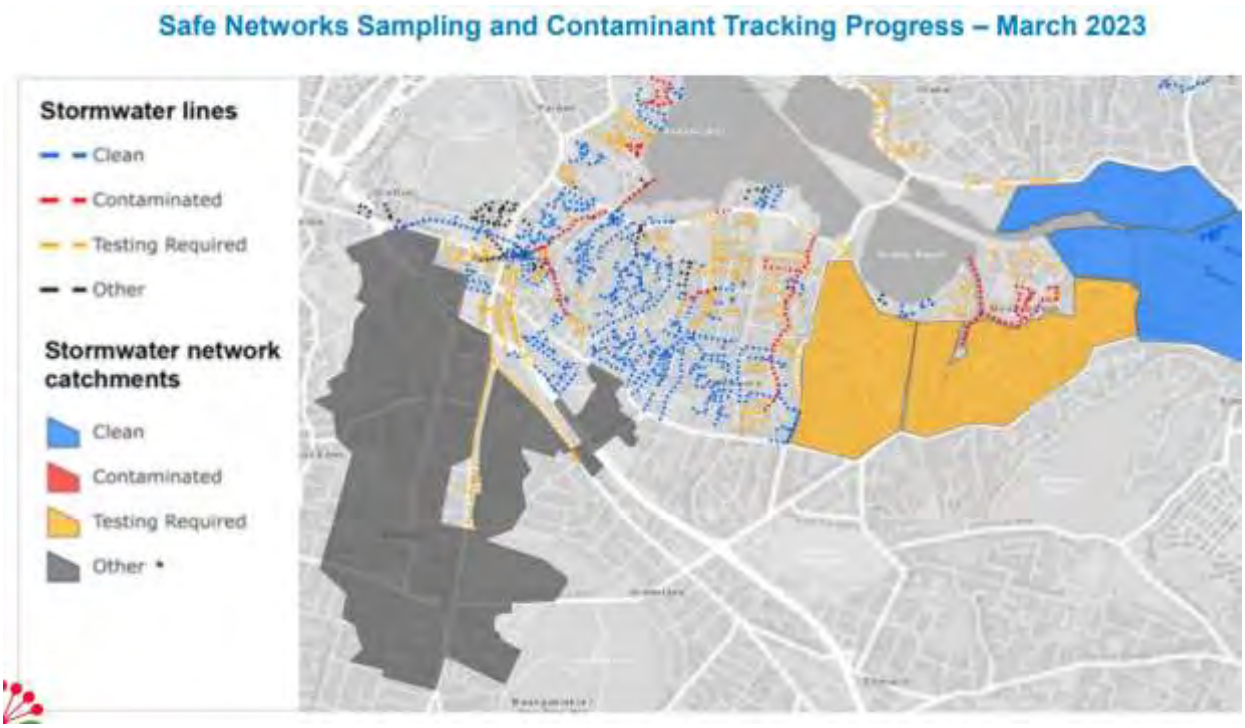
- It is Watercare's job to keep the sewage in the pipes and maintain the network. The non-notified network discharge consent granted to Watercare in 2017 was issued on the basis that the amount of sewage contamination in waterways would reduce. This reduction has not happened in the Bay nor has the

infrastructure been adequately maintained (i.e., per Watercare's Maintenance Plan), although some increased efforts of late have been made through Watercare and Auckland Council working together.

- Historically some members of the public knew of the sewage contamination of the Bay. Misinformation regarding the benefits of the completed Hobson Bay tunnel and yet to be completed Central Interceptor however has meant that some thought the issue was being resolved. There has been little testing of the water in the Bay and no post-construction testing of the efficacy of the Hobson Bay tunnel was done.

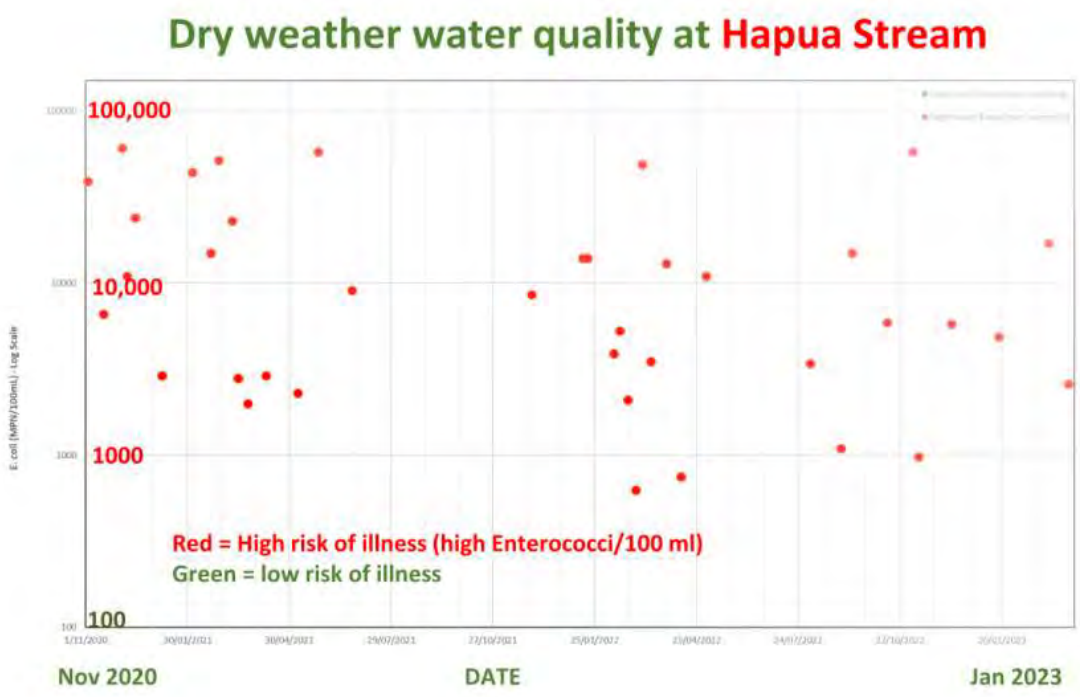
- As a result of lobbying from Hapua Thrive in January 2020 extensive testing was commenced by Watercare and Auckland Council in six streams and all stormwater discharge pipes into Waitaramoa Bay. Dangerously high levels of human faecal bacteria were found in every stream tested.

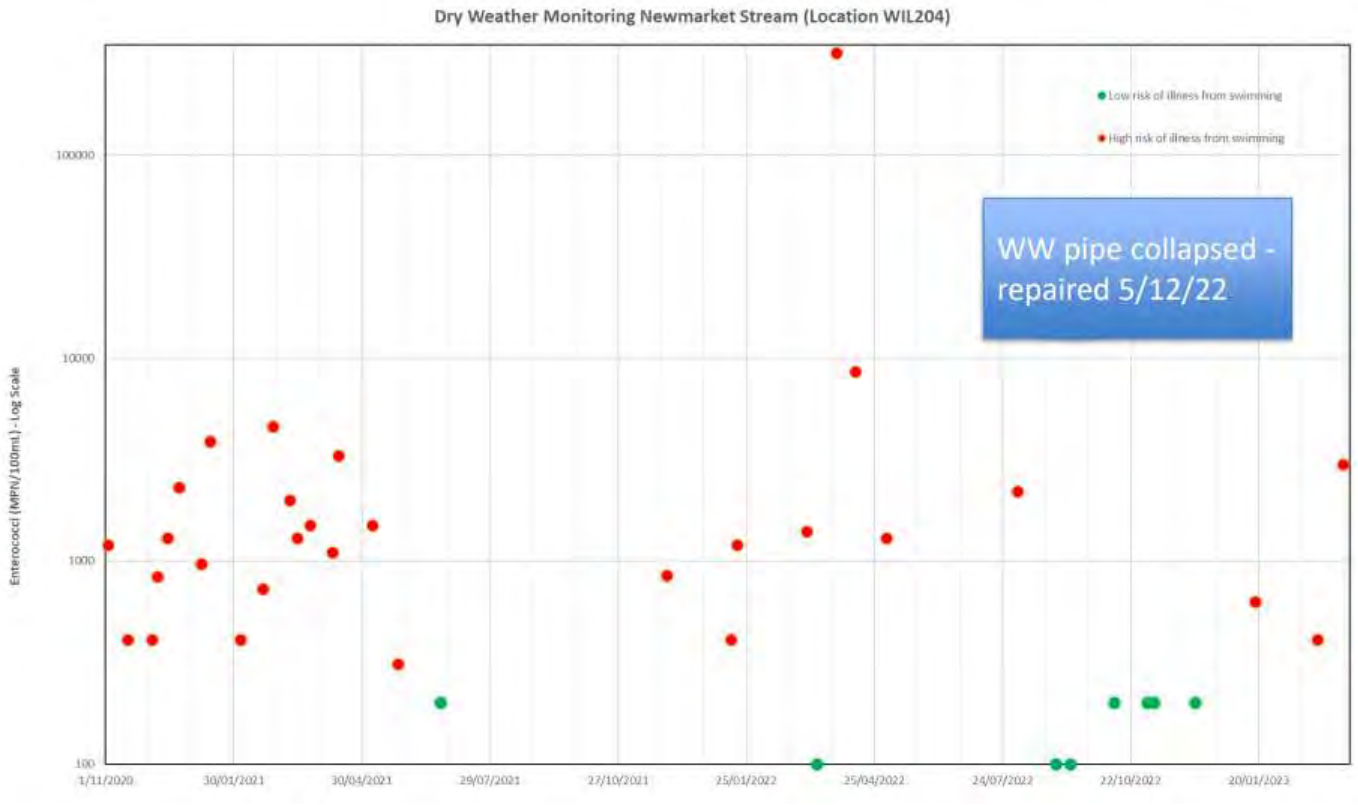
- Over the last three and a half years extensive investigative and remediation work has been conducted focusing on locations where sewage discharges in dry weather (which should not happen). 148 issues have been identified with 82 of those being resolved. This new proactive approach is appreciated however the problems are far more extensive than expected. To date less than half the pipes have been able to be checked. The initial expectation was that these dry weather issues would all be resolved within 6 months.



The dots show under half the Bay's stormwater lines have been tested and identified as 'clean (blue" or contaminated (red) after intensive testing over 3.5 years (which have included Covid)

- Hapua and Newmarket streams were prioritised first for resolution for dry weather discharges however they both remain highly contaminated.



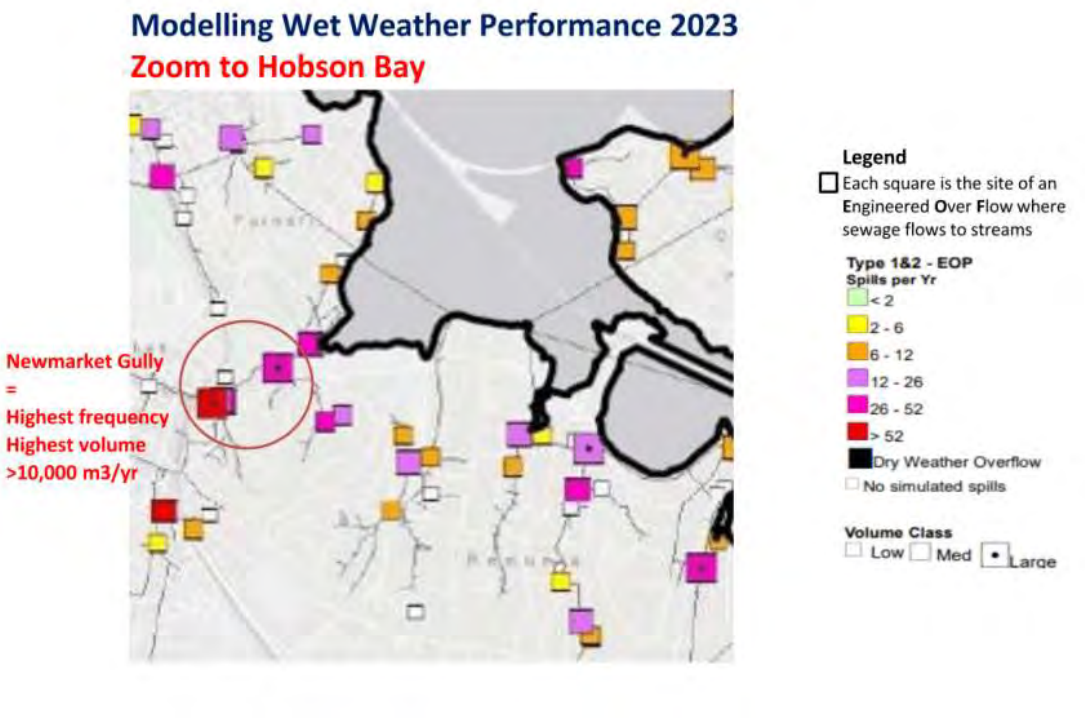


Dry weather water quality at Hapua Stream (top graph) and Newmarket stream (bottom graph). Red dots indicate high risk of illness due to high concentrations of faecal bacteria in the water. There are no green dots on the Hapua graph.

- There is no certainty of a clear funded plan to resolve these dry weather issues. Watercare's maintenance and inspection programme has been found to be lacking. Testing continues but resolution work is hampered by the fact that in just 0.5 to 2 mm of rain sewage is discharged through many of the emergency or engineered

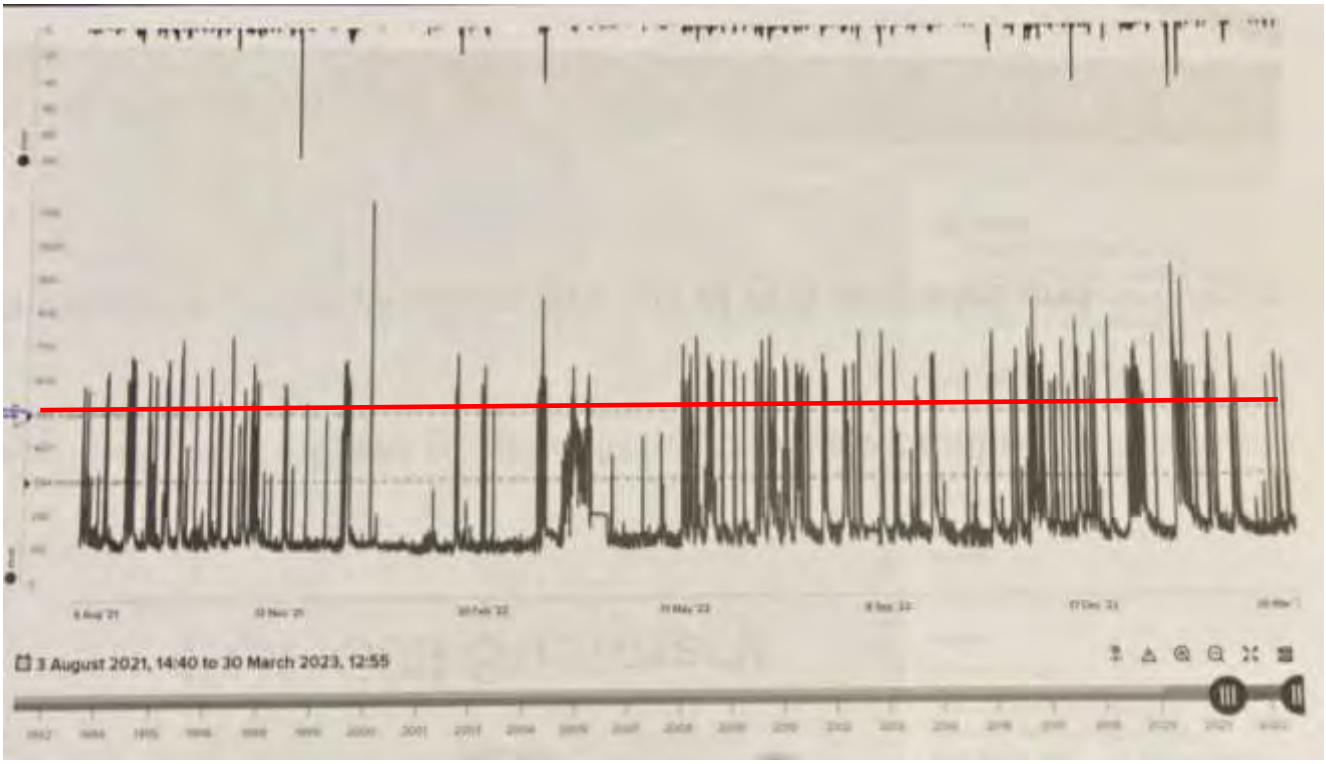
overflow points which further contaminate the water (and prevents 'dry weather' testing to check any remediation). From the beginning of 2023 testing in dry weather has only been able to be conducted on three occasions.

- More than a **quarter** of Auckland's engineered overflow points (EOPs) discharge into the Bay. Many of these discharges are high frequency and high volume. The Watercare Network discharge consent limit is for an average of **2** overflows per EOP per year or "Best Practicable Option". Watercare's 2023 modelling shows that more than 20 of the bays EOP's discharge at least **12** times than year; Hapua St EOP discharges more than **40** times per year; Ayr Street EOP discharges more than **80** times/yr.



- The desired outcome for Watercare is to only have green low volume overflows, and no brightly coloured boxes in their above chart. Modelling in this area since 2015 shows no improvement to 2023 and it is understood that these volumes and frequencies will not reduce for the next ten years (Source Watercare meeting 26 July 2023)

- Since 2022, 19 of these EOPS have been continuously monitored. This allows checks on the accuracy of the modelling. We know now that if there is enough rain to get your hair wet some high volume EOPS will overflow. Also monitors allow Healthy Waters to more accurately advise the safety of any community events planned from Safeswim sites in the Bay which is appreciated.



***Overflows at Scherf Rd that discharge into Portland Stream in the six months from August 2021 to March 2022. Sewage overflows happened when the flow (black line) was higher than the red line*. Top of graph shows rainfall**

- The 2023 modelling of overflows estimates 150,000m3 of wastewater is discharged in an average rainfall year- the equivalent of 60 Olympic sized swimming pools or 5000 busloads. Half of the volume comes from Newmarket Gully and this discharge could be stopped with the construction of a storage tank- known as the Newmarket Gully Storage Project. This tank was anticipated to be completed in 2017 when the Network Discharge Consent was granted to Watercare however progress on this has been very slow. There is however a tunnel "concept" in the early development stages which the community would like built in a timely manner and funding secured. This tunnel project is intended to resolve some of the local network issues as well as the main trunk line.

Again- Of particular note

- The Bay area has the highest frequency and volume of overflows without a funded plan in the rohe.
- Sewage smells in parks & walkways around the Bay are frequent. Signs warning the public not to access the water or eat kaimoana from time to time are installed but they are frequently removed or damaged. The Hobson Bay Community Plan (2013) and Catchment Plan (2014) both identified that reducing sewage inflows was required to improve the Bay for people and the environment.
- There is no long-term water quality or sediment monitoring programme in the Bay, so it is difficult to know the extent to which it is being degraded or the effects of improvements made, if any. A proactive maintenance and inspection programme of the infrastructure is also necessary.

Future Development Plan 2023 #8093

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Agree

Tell us why

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Agree

Tell us why

Other feedback

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

THE COALITION FOR MORE HOMES

The Coalition for More Homes presents a submission to Auckland Council on the Future Development Strategy.

About us

The Coalition for More Homes is a non-partisan group of volunteers and organisations including think tanks, consultancies, incorporated societies, Community Housing Providers, unions and developers.

Our vision

We want to see Auckland make the most of the opportunity provided by the NPS-UD and MDRS. The Future Development Strategy (FDS) is an important part of achieving this.

Auckland's response to the NPS-UD and MDRS can have huge benefits in the next few years and for future generations, to:

- Enable more homes for Aucklanders
- Boost housing choice & quality
- Enable more convenient, liveable neighbourhoods with access to transport & amenities
- Reduce emissions from housing and transport
- Lower travel cost and demand.

Auckland is in a multi-generational housing crisis. Secure and affordable housing is out of reach for more Aucklanders than ever. Poor housing quality is also leading to poor health outcomes, especially for renters.

We also have a climate crisis. On the 11th of June 2019, Auckland Council declared a climate emergency. In Auckland, 43.6% of carbon emissions are from transport. With constrained housing choices in high demand areas, many people are forced to live far from work and family, and accept long, costly commutes.

Allowing more people to live closer to where they work, study, shop and socialise and where they can access other transport options can significantly reduce our transport emissions. To expand housing capacity and choice, and reduce our emissions, we need to enable greater intensification around our existing centres, the rapid transit network and frequent bus network. This is what Climate Responsive Urban Development looks like.

Our FDS submission presents the following arguments:

1. Plan Change 78 should enable more intensification within Auckland's existing urban area (especially the isthmus) - much more, if CFMH's arguments in upcoming hearings are accepted.
2. This will mean a slowing in takeup of greenfields.
3. Intensification has lower public infrastructure costs than greenfields.
4. The points above mean that Council's capital investments will shift towards intensification rather than greenfields - and that the money should go further as a result. This will enable more homes overall, with better service levels.
5. Greenfields growth is likely to have higher externalities which aren't fully recouped/ charged.
6. A shift towards more intensification will also support lower emissions.
7. Enabling more intensification will also support better housing affordability.

1.0 Plan Change 78 should enable more intensification within Auckland's existing urban area (especially the isthmus).

The following points are taken from our Plan Change 78 submission, and are isthmus-focused. They are still true for Auckland's wider urban area (albeit to a lesser extent than the isthmus) when compared with greenfields growth.

1.1 We support the provision of more homes in Auckland's isthmus suburbs for several key reasons:

1.1.1 It will improve affordability

a) **Grants more affordable housing choices.** Even if they are still above the regional

median price, new medium and high density homes in isthmus suburbs will be cheaper than standalone homes in the same neighbourhoods. This provides relative affordability and entry to the accessibility and opportunity of those suburbs.

b) **Reduces housing costs throughout the city.** Restricting new homes in high-demand central suburbs pushes people out to the nearest suburb they can afford. This has flow-on effects right out to the outermost parts of Auckland, pushing up housing costs everywhere. It is also inherently inequitable, hurting those on low incomes the most and gentrifying areas which are relatively more affordable.

c) **Reduces transport costs.** Housing affordability must consider associated costs beyond rent or the capital cost of purchase. Transport costs are generally lower for those who live centrally, through having to travel shorter distances (regardless of the mode being used) to access jobs, education and daily needs.

d) **Reduces infrastructure costs.** Continuing to rely on greenfields and outer brownfields growth will push up the distances people must travel to access opportunities. This increases the cost of providing transport infrastructure. All growth requires infrastructure upgrades, but the costs are higher for greenfields (e.g. Drury where development contributions are now being proposed at $90,000 per home), or for dispersed/outer brownfields growth. Our central suburbs already have the best public transport, walking, and cycling infrastructure. They also have access to public facilities and amenities like open space, quality public parks, and playgrounds in neighbourhoods.

e) **Healthy and affordable homes to operate.** New-build homes are built to modern standards with better insulation and energy efficiency. While older homes, particularly those with special character protections, do not meet modern standards. The only way these old homes are brought up to modern standards is if they become even more unaffordable.

1.1.2. It's better for the climate

a) Aucklanders living in isthmus suburbs have more transport choices (cycling, walking, and public transport) than those in car-dependent outer suburbs. They also travel shorter distances by car. As a result, they have much lower transport emissions.

b) Enabling more homes in isthmus suburbs will make cycling, walking, and public transport more viable for many thousands of Aucklanders, and help cut transport emissions — a vital shift for our city.

c) Enabling more homes in isthmus suburbs will support the creation of 15 minute neighbourhoods, noting the significant provision of existing town and local centres in the Isthmus area.

d) Building homes in isthmus suburbs avoids converting productive horticultural and agricultural soils, particularly in areas such around Pukekohe & Drury, which are under immense pressure from greenfields subdivision.

1.1.3. It will create a more equitable Auckland

a) Grants more Aucklanders access to the high quality jobs, services, and amenities that the isthmus suburbs can offer.

b) Equity lens — provides housing choice, responds to the housing crisis, reduces living costs (including travel cost), ensures the city provides for the needs of all.

c) Enabling development means new homes will be of higher quality than older housing.

d) Allows for ageing/living in place.

2.0 This will mean a slowing in takeup of greenfields.

We are not against greenfields as such. CFMH does not have a position on greenfields growth; our focus is on enabling more housing supply and choice through intensification instead. Plan Change 78 will tilt Auckland's growth patterns further towards intensification - potentially much further, if key pro-housing points from our Plan Change 78 submission are accepted.

As such, Plan Change 78 will slow the rate of greenfields expansion, simply by making so much more housing possible within the existing urban area.

Over the last five years, roughly 80% of Auckland's building consents have been within the 2010 Metropolitan Urban Limit.[1] This boundary no longer exists, but it shows that the Unitary Plan has been successful in enabling new housing supply within Auckland's existing urban area. Only 3,000-4,000 homes per year are being consented outside the old Metropolitan Urban Limit.

However, the Unitary Plan didn't go far enough - hence further Government/ Parliamentary policy changes such as the NPS-UD and MDRS. In fact, the MDRS are intended in part to address the Unitary Plan's "bias towards urban fringe development",[2] by enabling much more supply in the central/ high-amenity places where people actually want to live.

3.0 Intensification has lower public infrastructure costs than greenfields.

4.0 The points above mean that Council's capital investments will shift towards intensification rather than greenfields - and that the money should go further as a result. This will enable more homes overall, with better service levels.

5.0 Greenfields growth is likely to have higher externalities which aren't fully recouped/ charged.

CFMH believes that greenfields growth should 'pay its own way', and not be cross-subsidised by Council/ Government or have unrecovered externalities. Under the status quo, greenfields is frequently granted an inefficient subsidy through:

- Council not fully recovering its growth-related infrastructure costs (e.g. through Development Contributions which are too low - Drury is the first area where Council

[1] https://www.knowledgeauckland.org.nz/publications/auckland-monthly-housing-update-datasheet/

[2] "Cost-Benefit Analysis of proposed Medium Density Residential Standards", PwC/ Sense Partners, 2021

has attempted to substantially lift Development Contributions, and even then it is not achieving full cost recovery)
- Council facing higher ongoing costs to maintain infrastructure for its entire lifetime due to the greater amount of per-capita infrastructure required for greenfields. These costs are not fully recouped via rates on the greenfields properties, since property rates are largely based just on the property's Capital Value.
- Government not fully recovering its costs (e.g. questionable roading projects with low Benefit Cost Ratios and/ or greater pressure on the state highway network).

4.0 A shift towards more intensification will also support lower emissions.

5.0 Enabling more intensification will also support better housing affordability.

Point 1.0 above provides some commentary on these points, but we will go into further detail in our Plan Change 78 evidence (and any Future Development Strategy hearing).

In brief, Council is correct that greenfields growth typically means higher transport emissions. There is substantial New Zealand and overseas evidence on this. Enabling more growth in the isthmus, and across Auckland's existing urban area, will dramatically improve housing affordability. This is made clear by the economic Cost Benefit Assessments for the NPS-UD and MDRS.

5.0 Summary.

As such, we support the overall direction of the draft Future Development Strategy - to pivot further towards brownfields rather than greenfields, and signal a reallocation of infrastructure funding accordingly. We note that for this direction to be achieved, Council needs to maintain focus on Plan Change 78 proceeding and becoming operative. This will give a major boost to (feasible, realisable) capacity within Auckland's isthmus and existing urban area, so that more people can live in the places they want, more affordably.

However, Plan Change 78 as notified doesn't go far enough, and covers huge parts of the isthmus with Qualifying Matters which would continue to restrict growth there. We firmly refute Council's assertion that the NPS-UD and MDRS "[make] it hard to have an informed estimation of where and when growth is likely to happen". The Cost Benefit Assessments for the NPS-UD and MDRS make it very clear that Auckland's isthmus is underdeveloped and very attractive for development, if Council can remove the restrictions that exist there. In particular, this means removing (or dramatically reducing) the Special Character Area overlays and those overlays referring to water network issues, Council should therefore be planning for more infrastructure investment in the isthmus.

We disagree with the inclusion of Special Character Areas as a constraint in "Figure 8: Cultural heritage constraints". We will present further evidence on Special Character Areas as part of the Plan Change 78 hearings process.

As for Development Capacity, Auckland Council clearly has not yet completed the full analysis required for a (finalised) Future Development Strategy. We make the following comments:

- We believe Auckland Council has undercooked its future growth/ demand projections. We will be carefully scrutinising the reasons for demand reducing since the 2021 HBA. In particular, Council should note that the existing housing shortage has not yet been solved. Council should be planning for a much higher number than 200,000 new homes, more in line with the 400,000 homes in past studies.
- Feasibility is likely to have worsened since the 2021 HBA was completed.
- We acknowledge that Council will be removing capacity in some areas which have higher natural hazard risks. We want to see new (feasible, realisable) capacity being added to replace this loss.
- We want to see much more plan-enabled (and feasible, and realisable) capacity in the "inner suburbs" and "isthmus brownfield" areas and will be presenting evidence on this as part of the Plan Change 78 hearings process.

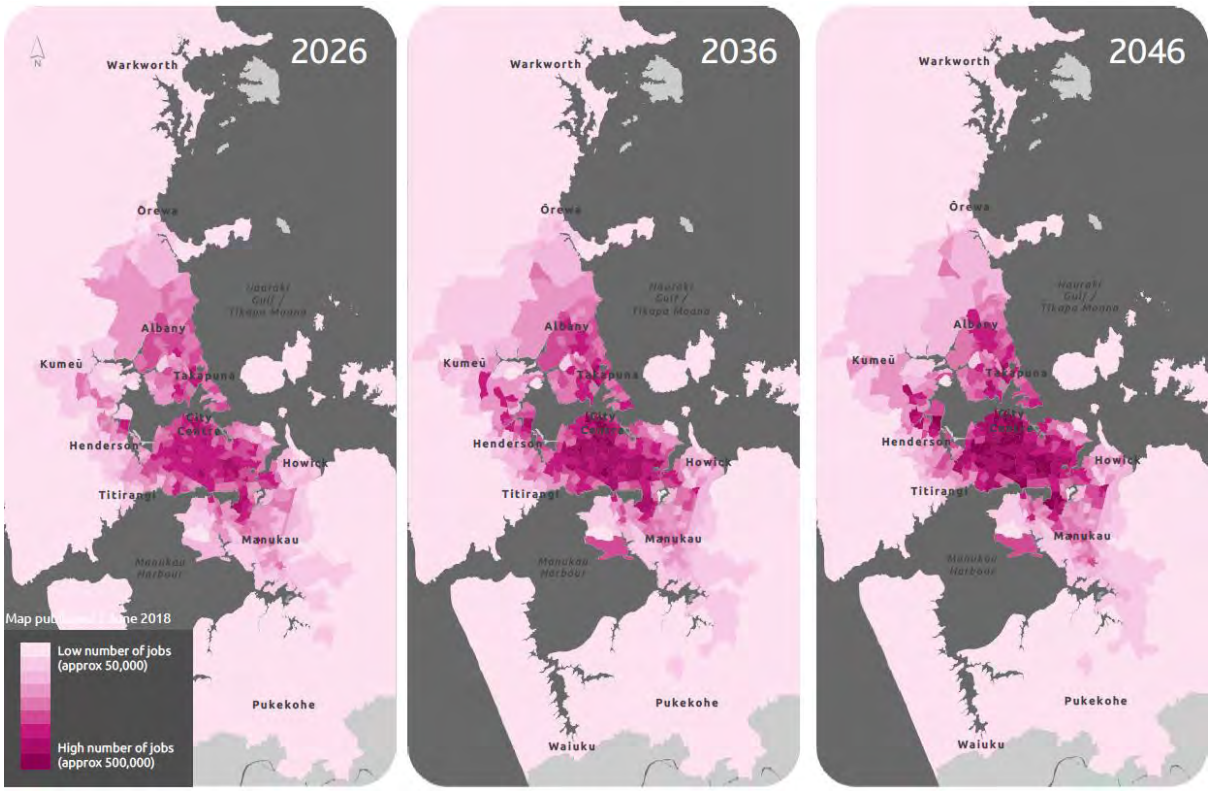
Lastly, we note that the isthmus will continue to be the most highly accessible, multi-modal area for transport throughout the 30-year horizon of the Future Development Strategy, and is the most desirable, highest demand area for new housing as evidenced by its high land values - as illustrated in the following two attached graphs.

The Coalition for More Homes

31 July 2023

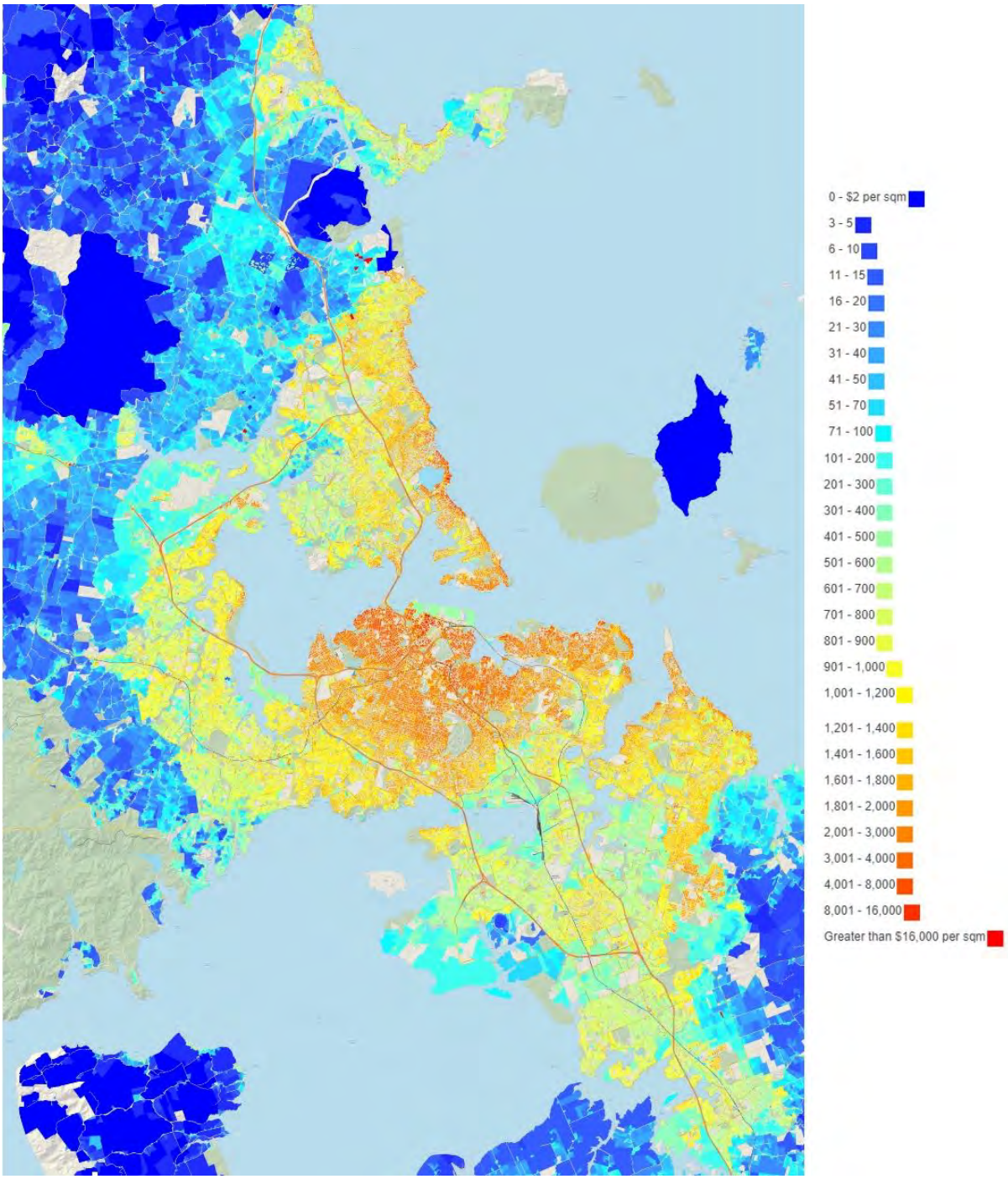
Attachment 1: Auckland Plan 2050, Map 8

"Access to Jobs (45 mins by public transport)"



Source: https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/auckland-plan/transport-access/Documents/map-8-ta-access-to-jobs-public-transport.pdf

Attachment 2: Auckland Land Values, 2017



Source: https://www.greaterauckland.org.nz/2018/07/16/auckland-land-values/

Future Development Plan 2023 #8108

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Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

Please also see attached submission

Accessible local centres

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

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

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

Agree

Tell us why

Please also see attached submission

Avoiding hazards

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

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

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

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

Other

Tell us why

Please also see attached submission

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Please also see attached submission

Other feedback

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

Submission to Auckland Council on the Draft Future Development Strategy 2023 ("FDS")

As an owner of Future Urban Zone ("Future Urban") land in Auckland, I make the following submission in response to an invitation to comment on the Auckland Council Draft Future Development Strategy 2023 ("FDS").

I **strongly oppose** the Council's approach to the FDS for the following reasons:

1. Removing the future urban zones and concentrating developments on brownfields will completely break the already tipping balance and is highly likely to create significant adverse societal impacts. To have developments focussed on brownfields will also turn Auckland streets into a huge construction site for many years to come – streets that are already densely populated. This would result in a terrible environment for the residents and also increases hazards due to these construction works for Aucklanders.

   The existing Unitary Plan has already considered the varying characteristics of each suburb and has the building density set to a maximum level, where housing supply and environmental impact is balanced. Current high-density areas are already experiencing significant/unresolved issues; little space between neighbours, single garage or no parking causing roadside parking to increase which causes traffic jams, no safe space for kids to play on the property, dangerous road conditions for pedestrians and drivers alike. All these issues are only becoming worse with the amount of tall, high-density terrace/town houses being permitted for construction in these areas.

2. Existing public service facilities in current urban areas, including but not limited to public medical centres, libraries, swimming and fitness centres, public green places, will bear pressure beyond the scope of the proposed FDS regulations, and the possibility of expansion under existing urban conditions (land size, traffic conditions etc) is extremely low. This will cause a lot of inconvenience for existing users and even a shutdown for an extended period of time.

   From the cost and convenience point of view, the construction and development of new public facilities in new urban areas will allow for even distribution of the pressure on existing urban areas. It is a more cost-effective and more feasible way to use taxpayers' money as these newly developed areas will be better constructed and more aesthetically designed to provide quality-of-life improvements for Aucklanders including better irrigation systems, public infrastructures, and public facilities.

3. From an investor's perspective, funds put towards areas with a future are much more attractive. With businesses and investment, the government will also receive more tax funding, this can further be put into support of better infrastructure such as new underground power lines instead of the dangerous overhanging power pylons. This deferral or restriction to the current Future Urban development will not only cost investors time and money, but will also cost the council money as well as confidence from the investors.

4. The Council has already put time and money into effectively investigating and planning so that the Unitary Plan can be put into effect, this includes consideration for the population growth in the area, schools, town centres, kindergartens, retirement villages, road planning, public transport, drainage as well as accommodation development. We should be able assume that council's decision to zone the area as Future Urban Zone years ago was after thorough consideration.

   As the population of Auckland continues to grow, there will inevitably be a shortage of affordable housing. Promoting the development of Future Urban areas by creating new centres of living not only provide job opportunities, but also affordable living for those in the locale. Whereas if this is reconsidered now, it would be a waste of taxpayers' money to do another review when the current Auckland area becomes heavily overpopulated and these areas become sorely needed again. There is no reason for the Council to waste money and time to change the original plan with only just 6 years from effect. Money and resources should be focussed on upgrading existing infrastructure which Auckland Council has always promised but failed to carry out.

5. Local schools are also have full capacity and will not fulfil the schooling requirements of future residents should population density increase in these areas. Schools are already facing classroom space shortage, shortage of teachers, and families within the school zones need to be put on waiting lists for enrolments which evidences that the population density has reached a limit under current infrastructure capacity. Existing school resources have been unable to cope with the increase in the school-age population brought by high density development in the existing urban areas, and the educational resources provided by the government cannot match the consequences of high density development. For example, Hobsonville Point Primary School now requires an application queue two or more years in advance, and Chapel Downs Primary in Flat Bush already has more than 50 students per class. The teachers are unable to identify individual students let alone provide effective student-teacher interaction if class size exceeds a certain number. This issue persists and is common in schools in high density urban areas. In view of the limitations of built urban areas, the possibility of expanding pre-existing schools is low and extremely challenging. The only way is to increase the construction of new schools in new urban areas to reduce the pressure on pre-existing education resources.

6. The recovery of brownfield to become usable land only has two possible resolutions, money spent on sterilising and recovery, or leaving the area to naturally recover over an extensive period of time. Infrastructure is the same, the replacement or installation of new systems into the area to support development does not change between brownfield and greenfield. Furthermore, brownfield is not currently attractive towards investors, nor would it be attractive towards home owners if they are told that the area was a contaminated, waste disposal or dump site.

   Brownfield intensification will cost the council a lot less if left to decontaminate naturally over a longer period of time. We are fairly certain that developers will not be keen towards putting funds into decontamination of a property when they can invest

into a property that does not have these issues, this is why the geo-technical report exists in the first place.

7. The Council proposes to remove four areas for urban development (down zone future urban land) because of hazard risk (in whole or in part). What are the hazards risks and have these areas been identified? Does this hazard risk have any causal effect on other areas? Investigation should be focused on areas where there is high risk of flooding. Increasing the density of housing in low-risk areas and decreasing the number of houses in flood-prone areas would make sense both ethically and economically, this is a good direction for the general population as it provides for new safe and sanitary living conditions.

   Impacts of natural hazards on future urban land do exist, especially in high-density brownfield zones. Due to the dense population, green areas have drastically reduced. Current drainage pipes are unable to process large amounts of rainwater and sewage as evident with recent floods. The damage caused by these recent events is directly related to the loss of green space due to the overdevelopment of brownfield sites. The FDS plan will only increase the pressure on existing infrastructures to withstand future natural hazards which would cause far more potential losses and heavier consequences in the future.

8. The FDS provides a trigger based approach to greenfield development. It's unclear if all infrastructure projects need to be implemented prior to a change of land zoning or is a staged approach. This is not a reasonable consideration, after the zoning has been changed, infrastructure projects should be implemented so as to support further development in those Future Urban areas where investors have put money into. A staged approach after the zoning change is reasonable as the expansion of Auckland goes outwards.

   Additionally, the FDS will form part the Reginal Policy Statement which poses a risk that all future private plan changes can be rejected if they don't align with the FDS especially around infrastructure triggers. These infrastructure rules should have already been considered during the previous Unitary Plan assessment. This should be a united decision and not one that is solely controlled by FDS, as there will be believers that emphasis on brownfield recovery at the cost of the council/government is more effective that upgrading or installing new infrastructure to greenfield, as previously mentioned developers would not be keen and neither would taxpayers.

9. Since the Unitary Plan came into action commencing 15 November 2016, certain regions have been zoned as Future Urban land under this plan, which greatly increased the CV of these areas and subsequently increased the respective land rates. As a result, landowners of these Future Urban land have paid more in local taxes over the years than what is required for the current municipal conditions in these areas. If the government wants to change this Unitary Plan, the overpaid land taxes starting 15 November 2016 must be refunded to these landowners.

Due to the increased CV after these regions were zoned as Future Urban land under the Unitary Plan commencing 15 November 2016, the housing price in these areas also rose sharply. Some individuals have already purchased property and land in these Future Urban land at high prices. The housing market prices are greatly affected by CV; therefore the government must compensate the existing landowners in the Future Urban land under the current Unitary Plan for the loss caused by the fall in house prices as a result of removing these areas as Future Urban land.

10. Restrictions to greenfield growth is absolutely going to cause already high-density areas to increase in price. As Auckland does not have plans to become a skyscraper city, the expansion can only go outwards, and it should as this is the quality of life that people who visit or reside in Auckland want for experience. New Zealand is known for its natural environment which attracts people around the world. People from other countries come here to enjoy a low-density high-quality life, and along with them come the money to support business opportunities. If all of Auckland's growth is focussed on brownfields, it will ruin the character of Auckland city.

    For many Aucklanders, living in a suburb is where they and their family can enjoy space and nature, and commuting to work in an urban centre is already part of the "kiwi culture". The FDS plans to overdevelop the brownfield zones which would only destroy this culture. If Auckland becomes no different from other overpopulated cities with a high cost of living, unaffordable property prices, and tiny living spaces, this will not attract anyone. No people, no business, no future.

Name [redacted]

Address

Signed [redacted]

Dated 19-7-23

Future Development Plan 2023 #8116

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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?

Disagree

Tell us why
please refer to submission letter

Accessible local centres

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

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

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

Disagree

Tell us why
please refer to submission letter

Avoiding hazards

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

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

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

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

Disagree

Tell us why
please refer to submission letter

Resilient infrastructure

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

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

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

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

Disagree

Tell us why
please refer to submission letter

Other feedback

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

please refer to submission letter

FEEDBACK ON AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023-2053

To: Auckland Council

Name of submitter: Yun Hwa Investments Limited

This submission relates to Auckland Council's Future Development Strategy 2023-2053 ("FDS"). The feedback is concerned with the overall strategy and also specifically the land that is located at [redacted], Auckland, currently zoned Future Urban in the Auckland Unitary Plan.

This property falls within the Franklin Local Board area.

Yun Hwa Investments Limited, owns a site at [redacted]. This land is generally contiguous with the existing urban environment and it is located in a wider island of Future Urban Zoned land that is defined by Takanini to the North and Drury to the South.

FDS has proposed new timing - The subject site has mainly been identified as "Proposed area for removal (indicative)" as indicated in **Figure 1.**

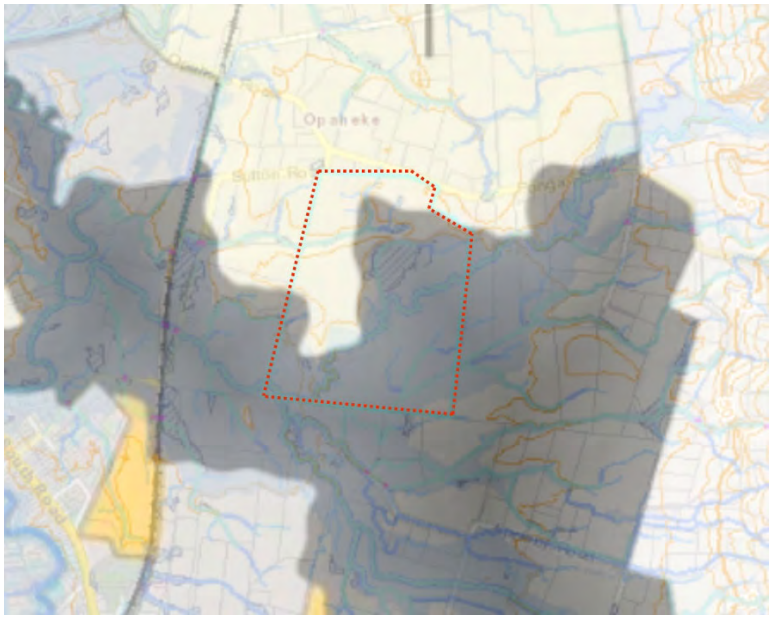


Figure 1 – FDS Proposed area for removal (indicative) - (subject site outlined by the red line)

The reasons for the submitter's concerns are:

1. The applicable provisions intended for this land do not enhance housing affordability by supporting competitive land and development markets, contrary to Objective 2 of the National Policy Statement on Urban Development 2020 ('NPSUD");

2. The provisions lack a solid foundation in evidence or an appropriate cost-benefit analysis, which is required by section 3.11 of the NPSUD to assess the impact of different regulatory and non-regulatory options for urban development and their contribution;

3. The specific reasons for the submitter's concerns are as follows:

    a) The surrounding residential zoned areas located in Drury and Takanini are either currently undergoing development or have already been developed.

    b) The Opaheke/Drury area encompasses 1,149ha of greenfields land, offering substantial housing capacity for future residents.

    c) The areas identified as Proposed areas for removal (indicative) appear to be primarily affected by floods. Recent developments in Stonefields and Takanini have demonstrated that effective stormwater strategies can be implemented to enable development.

    d) The submitter has undertaken technical engineering flooding assessment that confirms engineering solutions can amend flood plains and increase developable area alike to many existing developed area in Auckland.

    e) The submitter strongly believe that the removal of the areas identified as Proposed areas for removal (indicative) would contribute to improving housing affordability by supporting competitive land and development markets, in alignment with the objectives of the NPSUD.

    f) Greenfield developments coped well with the recent rain events in the Auckland region and provided for resilient communities compared with many of the existing brownfield areas. Hobsonville Point has been cited as a good example. Many brownfield areas earmarked for growth cannot cope with additional intensification.

    g) The FDS deferral of zoning creates severe financial hardship for Future Urban Zone landowners who purchased in reliance on the 2017 FULSS. The U-turn signalled by the draft FDS will significantly damage investment

confidence for years to come, sending developers to more development friendly cities.

h) It is unconstitutional to embed the FDS in the Regional Policy statement and through that mechanism remove the ability of landowners to apply for and achieve private plan changes.

i) It is most likely illegal for this policy to be introduced without extensive consultation and public hearings.

The submitter's concerns would be addressed in the following way:

a) Evidence or an appropriate cost benefit analysis as required by section 3.11 of the NPSUD to assess the impact of different regulatory and non-regulatory options for urban development and their contribution.

b) Retaining the area of land at [redacted], along with the majority of the land identified in the Proposed areas for removal (indicative) to remain as Future Urban Zone, adhering to the original delivery timing set forth in the Future Urban Land Supply Strategy 2017**.**

c) Alternatively, Future urban area development should be allowed for in all Future Urban Zones where piped services capacity exists or can be provided by developers, especially where nearby business land is included to enable people to live near work and have housing choice.

d) That no changes are made to the FDS and Future Urban Zone (including staging) until Plan Change 78 has been approved for at least two years, so that and an accurate assessment of feasible brownfield capacity is completed including business land.

e) Implementing any necessary consequential changes to the Future Development Strategy (FDS) that would effectively address the concerns raised in this submission.

We welcome the opportunity for further engagement and clarification with the Strategy team if required. Please feel free to contact us at your convenience.

Thank you for considering our submission. Your attention to this matter is greatly appreciated.

[redacted]
For and on behalf of Yun Hwa Investments Limited as its duly authorised agent.

Date: 31 July 2023

Address for service of submitter:

Yun Hwa Investments Limited
[redacted]

Future Development Plan 2023 #8119

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

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

Disagree

Tell us why

Accessible local centres

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

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

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

Agree

Tell us why

Avoiding hazards

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

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

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

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

Other

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?

#8119

SUBMISSION TO THE AUCKLAND COUNCIL : FUTURE DEVELOPMENT STRATEGY

SUBMISSION BY WAIOHUA-TĀMAKI RŌPŪ

DRAFT 4 – **27 JULY 2023**

This is a submission by Waiohua-Tāmaki rōpū to the Draft Future Development Strategy (FDS) of Auckland Council.

This submission in particular relates to the Te Auaunga Precinct land (currently called Wairaka Precinct) at Carrington Road, Point Chevalier/Mt Albert.

1. **Waiohua-Tāmaki rōpū**

   The Waiohua-Tāmaki rōpū comprises the following iwi:

   - Ngāi Tai Ki Tāmaki;
   - Ngāti Tamaoho;
   - Ngāti Te Ata;
   - Te Ākitai Waiohua;
   - Te Kawarau ā Maki.

   This submission is made by the iwi collectively through their rōpū. Individual iwi may in addition make their own separate submissions to the Draft FDS.

   Waiohua-Tāmaki rōpū is working collaboratively with the Crown over land development within part of the Te Auaunga Precinct (currently called the Wairaka Precinct). This land was originally part of the Hospital Board lands for the Oakley Hospital. It has progressively owned by Unitec and more recently the Crown.

   It is part of the Land for Housing programme at which three rōpū, including Waiohua-Tamaki, will develop a portion of this property.

2. **General comments about the draft FDS**

   The Draft FDS has been prepared by the Council under the National Policy Statement on Urban Development and is intended to propose a strategy to provide for and manage Auckland's growth over the next 30 years.

   It represents a significant change in the current "balanced growth" strategy. The draft FDS:

   (a) Disproportionately focuses the next 30 years' growth for Auckland being provided for within the existing urban area.

   (b) Substantially defers the timing for the release of greenfield land for urban development. In some cases this currently identified Future Urban zoned land is set down for 'further investigation' or in some cases removed from future greenfield development.

(c) Identifies the significant constraints that Council is operating under in terms of infrastructure.

(d) Acknowledges that the targeted approach to existing urban areas will mean that large scale substantial infrastructure and service upgrades and investment will be required.

(e) Seeks to prioritise funding to identified significant growth areas, and around key subregional nodes.

The Council expresses a view that the existing urban area already represents significant infrastructure provision, and that it is more efficient to focus investment within these existing areas.

The Council relies on a substantial uplift in residential yield across the existing metropolitan area. However the identified areas for growth and associated infrastructure investment are quite limited. If the Council is to place such reliance on brownfield development then infrastructure investment must support this growth.

The Waiohua-Tāmaki rōpū collectively, and as individual iwi, oppose the Draft FDS in its current form. The existing *balanced strategy* which has been in place since 2011 is much preferred.

This submission focuses on the Te Auaunga Precinct and the Carrington Road area.

3. **The Opportunity for the Te Auaunga Precinct land to make a significant Contribution to Auckland's Growth**

The Te Auaunga Precinct land at approximately 32 ha of vacant or underdeveloped land available for housing, represents the single biggest block of brownfield land on the Auckland isthmus. It should be a key part of the Council's Urban Consolidation growth strategy.

The Draft FDS signals that growth should be focused around town centres and along major public transport corridors. The Te Auaunga Precinct land is ideally located in terms of these characteristics.

- It is within easy walking distance of either the Point Chevalier or Mt Albert town centres.
- It is on the *outer link* bus service.
- It is in easy walking distance for the major public transport corridors along Great North Road and the Mt Albert rail station.
- It is relatively close to the city centre and with good connections to the CBD.

The Te Auaunga Precinct is subject to a plan change request currently being processed by the Council (in pre-notification stage).

That plan change will provide for between 4,000 and 4,500 dwellings within the Precinct. This compares to the 3,500 dwellings provided for within the current Precinct provisions (including student accommodation).

At 4,000-4,500 dwellings, Te Auaunga will make a meaningful contribution to the Council's growth strategy. Even if the plan change is not successful, and development is constrained to the current zoning, this would still make a contribution to growth. That would however represent a material underdevelopment of the land.

The final FDS should recognise the importance of this land and the significant opportunity it offers in terms of providing for Auckland growth on a location which meets the key criteria for growth nodes.

4. **Infrastructure**

This land is uniquely placed to achieve a high-density development well serviced by infrastructure.

Transport

The land significantly benefits from:

(i) The Waterview Tunnel and connections to the North-Western Motorway have substantially reduced traffic volumes in Carrington Road.

(ii) The southern portion of the precinct is within the walkable catchment of the Mt Albert Rail Station. The central portion is in the walkabout catchment of the Link bus services on Carrington Road, or the high volume bus services along Great North Road accessed by the new pedestrian bridge. The northern portion of the precinct is within easy walkable catchment of the public transport services along Carrington Road (Link service) and the high volume bus services through the Point Chevalier shops.

(iii) The additional yield of the plan change will mean upgrades are needed in the Carrington Road corridor between Mt Albert and Point Chevalier. This has been funded by the Crown to the value of $113.2 million. This will provide dedicated bus lanes, cycleways and vehicle lanes through this corridor. This will give material improvement in the network connections.

(iv) The high standard cycleways within the development will link to the north-western cycleway, and the Mt Albert cycleway. It also connects to the Waterview Strait.

Wastewater

The site benefits from the construction of the new *central interceptor*. The current interceptor connecting West Auckland through to Orakei runs through the site. The *central interceptor* will take significant wastewater volume out of this area. That will resolve all but extreme overflows within the combined system, and introduce significant capacity. The *central interceptor* is physically in construction.

Potable water

Potable water is available to the block, but does need an upgrade at Sutherland Road. This is already an identified project within the Watercare Asset Management Plan. With this upgrade already in the budget, there is good potable water supply to the block.

Stormwater

All stormwater matters can be resolved within the broader site. The land benefits from adjoining Oakley Creek and the Waitematā Harbour. The Council's preference is to move stormwater through the precinct as quickly as possible so that in times of peak rain events, stormwater from the land has entered and exited Oakley Creek before the more flood prone waters from upstream arrive and risk impacting flooding to the south.

Regardless, this land being close to the mouth of Oakley Creek means that flooding risk is minimal.

None of the stormwater from the land enters the existing Council piped network. All the infrastructure will be upgraded as part of the development.

Overall

This means Te Auaunga Precinct is uniquely placed to address infrastructure to achieve the Council's urban consolidation strategies.

5. **Request**

(i) The Waiohua-Tāmaki rōpū requests that the Te Auaunga Precinct lands should be identified as a key growth node within any FDS.

(ii) That the required infrastructure funds (noting these are largely funded from the Crown but also the existing Watercare Sutherland potable water supply upgrade) be identified within any FDS.

Future Development Plan 2023 #8123

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

Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Accessible local centres

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

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

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

Disagree

Tell us why

Avoiding hazards

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

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

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

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

Disagree

Tell us why

Resilient infrastructure

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

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

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

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

Disagree

Tell us why

Other feedback

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

Future Development Plan 2023 #8129

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

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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?

#8129

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31 July 2023

Consultation Draft of the Auckland Future Development Strategy
Via online submission: https://akhaveyoursay.aucklandcouncil.govt.nz/future-development-strategy

Submission on the Consultation Draft Auckland Future Development Strategy 2023 - 2053

Name of Submitter: Waka Kotahi NZ Transport Agency

Address for Service: Waka Kotahi NZ Transport Agency
Attention: [redacted]

Overview of submission by Waka Kotahi:

1. Waka Kotahi welcomes the opportunity to provide feedback through our submission on the Draft Auckland Future Development Strategy (FDS). This submission addresses key parts of the FDS which we support, together with areas Waka Kotahi considers should be clarified and some that should be strengthened.

2. Waka Kotahi seeks to continue to engage with the Council as a key stakeholder in the draft FDS. This includes working with the Council team to:
   - finalise the FDS with the incorporation of our feedback provided in this submission.
   - develop and finalise the FDS implementation plan.

3. In summary, Waka Kotahi identifies the following key points within our submission:

   - General support for the direction of the FDS which aligns with our strategic direction.

   - General support for the Strategic Spatial Framework including the principles for growth.

   - Support the update to the quality compact approach to provide a greater degree of intensification in existing urban areas, along with less reliance on expansion into future urban areas.

   - Request for a map in the FDS which clearly shows a spatial vision for Auckland, by identifying the parts of Auckland where growth and development will be encouraged including in areas where there is existing infrastructure, high accessibility and areas integrated with planned strategic infrastructure, not just where investment will be focused.

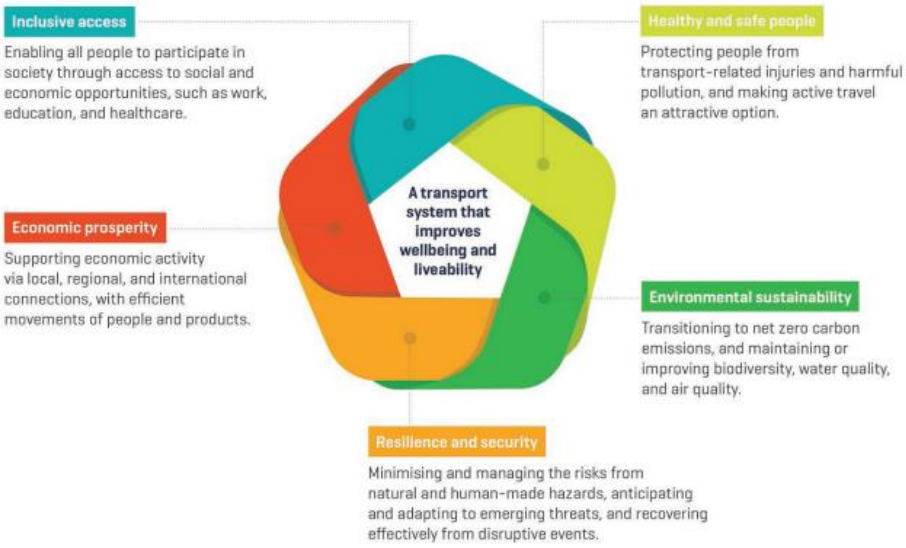
   - Support the Future Urban Land Supply Strategy being incorporated into the FDS and support changes to the future urban areas including the removal of those areas subject to major hazards and delaying a number of other areas, subject to a few points outlined in detail within the submission.

Waka Kotahi Statutory Functions, Powers and Responsibilities:

4. The Waka Kotahi statutory objective under the Land Transport Management Act 2003 (LTMA) is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest.

5. Waka Kotahi must carry out its functions in a way that delivers the transport outcomes set by the Government which are provided in the Government Policy Statement on Land Transport (GPS)[1]. This sets out four strategic priorities, which are relevant to this submission:
   - **Safety**: Developing a transport system where no one is killed or seriously injured.
   - **Better Travel Options**: Providing people with better transport options to access social and economic opportunities.
   - **Climate Change**: Developing a low carbon transport system that supports emissions reductions, while improving safety and inclusive access.
   - **Improving Freight Connections**: Improving freight connections for economic development.

6. The Ministry of Transport (MoT) have developed a Transport Outcomes Framework[2]. The purpose of the transport system is to improve people's wellbeing, and the liveability of places. It does this by contributing to five key outcomes, summarised in the diagram below.



7. All these outcomes are inter-related and need to be met as a whole to improve intergenerational wellbeing and quality of life.

8. The National Policy Statement on Urban Development (NPS-UD)[3] provides a framework which supports strategic transport outcomes through the integration of land-use planning and infrastructure provision. The NPS-UD also provides the key policy direction for the development of the Future Development Strategy.

[1] https://www.transport.govt.nz/area-of-interest/strategy-and-direction/government-policy-statement-on-land-transport-2021/
[2] https://www.transport.govt.nz/area-of-interest/strategy-and-direction/transport-outcomes-framework/
[3] https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-updated-may-2022/

9. Policy 1 of the NPS-UD is of particular relevance to the outcomes of the FDS from a transport / land use integration perspective (highlighted bold for emphasis):

> *Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*
> - *have or enable a variety of homes that:*
>   - *meet the needs, in terms of type, price, and location, of different households; and*
>   - *enable Māori to express their cultural traditions and norms; and*
> - *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
> - ***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***
> - *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
> - ***support reductions in greenhouse gas emissions**; and*
> - *are resilient to the likely current and future effects of climate change.*

10. The Emission Reduction Plan / Te hau mārohi ki anamata (ERP)[4] sets out a pathway to an approximate 41% reduction (on 2019 levels) in New Zealand's carbon emissions by 2035. Transport is expected to play a crucial role in meeting this target. The transport chapter of the ERP includes several nationwide sub-targets for 2035:
    - reduce vehicle kilometres travelled (VKT) by 20% (versus baseline 2035 forecast)
    - increase zero emissions vehicles to 30% of light fleet
    - reduce freight emissions by 35%
    - reduce the emissions intensity of transport fuel by 10%.

11. To deliver on Government outcomes, including those set by the GPS, Emission Reduction Plan, NPS-UD and the Transport Outcomes Framework, Waka Kotahi has developed strategies relevant to the FDS. These are Arataki – our 30 Year Plan[5], Toitū Te Taiao (sustainability action plan)[6], our urban development position statement[7] and Auckland Strategic Spatial View[8]. These documents have been shared with Auckland Council as part of our input into the development of the draft FDS. We have used these policies and strategies to inform our submission on the Auckland FDS.

12. Waka Kotahi generally supports the direction of the FDS which align with our strategies. Waka Kotahi encourages the Council to address the areas outlined below. We wish to continue to work with Auckland Council to address these matters effectively.

Strategic Spatial Framework

13. Waka Kotahi generally supports the Strategic Spatial Framework including the principles for growth and change to provide direction to the outcomes of the FDS. The points below indicate where the framework needs further work and improvement.

[4] Emission Reduction Plan: https://environment.govt.nz/publications/aotearoa-new-zealands-first-emissions-reduction-plan/
[5] Arataki – 30 Year Plan: https://www.nzta.govt.nz/planning-and-investment/planning/arataki/
[6] Toitū Te Taiao: https://www.nzta.govt.nz/about-us/about-waka-kotahi-nz-transport-agency/environmental-and-social-responsibility/toitu-te-taiao-our-sustainability-action-plan/
[7] Urban Development Position: https://www.nzta govt.nz/assets/resources/auckland-strategic-spatial-view/urban-development-position-summary-and-key-components-march-2023.pdf
[8] Auckland Strategic Spatial View: https://www.nzta govt.nz/assets/resources/auckland-strategic-spatial-view/auckland-strategic-spatial-view.pdf

14. The Strategic Spatial Framework should be explicit about how it relates to the strategic outcomes of the Auckland Plan 2050. Waka Kotahi suggests clarifying whether these are intended to be complementary or replace some of the Auckland Plan 2050 outcomes.

15. Waka Kotahi considers that climate change challenges of emission reduction, including the reduction of vehicle kilometres travelled (VKT) and resilience should be included in the overarching challenges and further integrated through the FDS.

16. The Strategic Spatial Framework does not include sufficient direction for future business/employment growth outcomes in Auckland. Waka Kotahi suggests this should be informed by an up-to-date assessment of business land demand and capacity, infrastructure needed to support commercial and industrial land uses, employment growth, mixed use development and the role and function of centres. Waka Kotahi suggests considering inclusion of these issues in both the overarching challenges and the spatial outcomes.

17. Waka Kotahi supports Principle 1 and its alignment with strategic transport outcomes to reduce emissions from the transport sector. However, suggests that there should be a stronger emphasis on growth being encouraged/enabled in and around rapid transit stops and centres, and intensification in locations that are highly accessible and sustainable.

18. Waka Kotahi supports Principle 2, with additional content. Waka Kotahi suggests further additional content that explicitly recognises the risks and significant maintenance costs in relation to infrastructure that is exposed to natural hazards, including that it can be the infrastructure that is at risk rather than the housing or businesses that the infrastructure connects to.

19. Waka Kotahi supports Principle 3, in particular, reference to multiple outcomes from investment decisions and the inclusion of the infrastructure investment hierarchy.

20. Waka Kotahi supports Principle 4. This principle aligns with Toitū Te Taiao - our sustainability strategy, in particular its goal of reducing environmental harm and the protection and enhancement of the natural and built environment.[9]

21. Waka Kotahi generally supports Principle 5, however, we do not agree with the statement that Council has "limited tools to help direct growth". We recommend this statement is removed or identify more clearly the tools available, including investment and financial tools, available to direct growth in locations that will achieve multiple outcomes. We generally support Principle 5b, but we consider that there are other areas that should be prioritised for growth and investment, such as around rapid transit stops.

Part 3 Inputs to the spatial response

22. Waka Kotahi supports the approach to identifying natural and physical constraints. However, a clear strategic statement regarding "special character" should be included which contrasts the value of retaining these areas with the wide-ranging benefits of enabling development in these very accessible areas. The benefits of growth and

[9] Toitū Te Taiao Workstream 3: Protect and enhance the natural and built environment: https://www.nzta.govt.nz/assets/resources/toitu-te-taiao-our-sustainability-action-plan/sustainability-action-plan-april-2020.pdf

intensification in these areas is identified in a number of the FDS's outcomes and principles, yet there is no consideration of this within the FDS or its background evidence.

23. Clause 3.14(1)(a) of the NPS-UD requires every FDS to be informed by the most recent applicable HBA (housing and business development capacity assessment). Whilst we understand this work is underway, the FDS would benefit from an up to date HBA being made available which includes a complete assessment of housing and business land. Without this full up to date assessment of the feasible and reasonably expected to be realised capacity for housing is unclear, particularly how this relates to anticipate growth across Auckland.

Part 4 Our Spatial Response

24. Waka Kotahi supports the update to the quality compact approach in the Auckland Plan 2050 to provide a greater degree of intensification in existing urban areas, along with less reliance on expansion into future urban areas.

25. However, Part 4 of the FDS needs a map which shows the overall strategy more clearly and identifies how, where and when growth should be focused within the existing urban area alongside the future urban and rural areas. This should include both housing and business opportunities.

26. Clause 3.13(2) of the NPS-UD states that:

> *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*

27. Waka Kotahi considers that the FDS needs to fully reflect clause 3.13(2) of the NPS-UD. Waka Kotahi is of the view that there is insufficient information in relation to clause (a) and (b). We request that land use and transport is clearly framed, and in particular, integrated by preparing a spatial planning map(s) and supporting information that addresses the following points:

- Identify key strategic transport networks (including road and rail freight) and the Auckland current and future rapid transit network. The Auckland rapid transit network is fundamental given this is where significant investment has been made or is planned to improve public transport levels of service. Waka Kotahi suggests that the FDS would benefit from identifying the opportunities for transformation associated with rapid transit and strategic networks.

- Identify highly accessible areas (i.e., inner isthmus). These are likely to be areas where there has been significant investment in infrastructure and there are likely to be further opportunities to optimise the outcomes delivered from this existing infrastructure.

- PC78 locations should be represented, especially where they align with Rapid Transit infrastructure investment and in areas with the highest levels of public transport accessibility (i.e., New Lynn, Greenlane, Mt Albert).

- Identify freight hubs, key employment areas, significant natural and open spaces and key community service destinations (e.g., hospitals and universities).

- Show the centres hierarchy, including consideration of how it links with the multi-nodal approach. This includes differentiating between nodes within the existing urban area, future urban areas and rural areas (i.e., recognising Pukekohe and Warkworth as rural nodes which may have a different approach to growth and more consideration to additional urban nodes such as Takapuna and Sylvia Park).

28. Waka Kotahi supports prioritising locations that give the greatest benefits for the region and address the Strategic Spatial Framework. However, it is not clear what Figure 18 (Spatial priority areas) is intended to show. Figure 18 includes potential major development locations, project corridors, alongside priorities for investment but this could be misinterpreted to show broader urban form outcomes.

29. Waka Kotahi recommends that Figure 18 Spatial Priority Areas is further refined through the Auckland Housing and Urban Growth Joint Programme to address the following points:

    - Spatial priorities for investment and planning are differentiated.

    - Consideration of additional priority areas for investment (i.e., locations which are expected to have greater development potential and are well serviced by the existing rapid transit network such as New Lynn, Ellerslie, Greenlane and Mt Albert).

    - Clarify the investment approach for the City Centre over the 30-year timeframe, acknowledging the range of major projects currently being planned.

    - Clarify the spatial extent of Drury and Westgate as priority areas for investment, given the level of investment to date and the work undertaken through the joint work programme.

30. Waka Kotahi would welcome the opportunity to work with Auckland Council to assist in the development of the spatial planning maps and prioritising areas for planning and investment to ensure greater integration and alignment.

Future Urban areas

31. Waka Kotahi supports the information in the Future Urban Land Supply Strategy being reframed and included in the FDS. Given the long lead time required to plan and deliver strategic infrastructure, funding and financing considerations, and alignment with emission reduction/VKT reduction opportunities Waka Kotahi supports delaying urbanisation in some future development areas.

32. Equally, Waka Kotahi is broadly supportive of timing of urbanisation being aligned with infrastructure provision. Waka Kotahi supports the timeframes for sequencing in the draft FDS identified as indicative. We also support the use of the tables with infrastructure

projects as a means to illustrate integrated and sequenced phasing. Waka Kotahi also supports clarification, that the list may be subject to change as further strategic planning and/or infrastructure funding and financing is developed. Waka Kotahi makes the following comments in relation to triggers and some of the future urban areas below.

Drury

33. Significant transport investment has been made to service Drury (e.g., rail electrification and new stations, widening of the Southern Motorway, etc.), and we query why significant other parts of Drury have been postponed to 2035+. Given the investment and pattern of live zoning in Drury to date, Waka Kotahi suggests to optimise and realise the outcomes from this investment, that all of Drury West stage 1 and 2 and Drury East should be identified for 2025+ unless there are infrastructure constraints which affects this land.

34. Please clarify the timing for the Hingaia Rising Main and or any other infrastructure constraints. Appendix 3- Water Supply Projects, identifies the timing for the “Hingaia watermain enhancement- Southern" for 2023+. If these constraints are required to enable the development of this land and this is the only reason for their delayed timing, then Waka Kotahi suggests that this is made explicit in the document.

Whenuapai and Redhills

35. The intentions for Whenuapai and Redhills are unclear, Waka Kotahi suggests clarifying the approach. Figure 18 Spatial Priorities indicates some investment is planned for the first decade and Appendix 8 (Table 3) indicates development readiness 2035+. Waka Kotahi is supportive of the phasing indicated in Appendix 8 Table 3, which will enable urbanisation to be timed with the implementation of rapid transit.

Areas for removal

36. Waka Kotahi supports the identification of the future urban areas proposed for removal, where supported by evidence.

Areas for investigation

37. Waka Kotahi supports land-use decisions that reduce trip lengths and focus growth in areas with better travel choice. We understand the rationale for investigating these areas given the Emission Reduction plan (VKT targets), recent climate related events and funding constraints in Auckland.

38. To facilitate transport planning currently in progress, Waka Kotahi would like to highlight the importance of decisions in relation to these areas being a priority. The uncertainty provides challenges for planning and protecting transport corridors in some of the future urban areas.

Information on Major Projects in Appendix 9

39. Waka Kotahi support reference in the FDS to major projects. Waka Kotahi suggests that this section could be improved and updated as and when decisions are made on these projects. We suggest that Council liaise with the relevant major project teams to ensure the FDS content is up to date and incorporates any decisions made between now and when the FDS is finalised.

Inter-regional considerations

40. Waka Kotahi suggests that the FDS should be strengthened with more detailed analysis of inter-regional issues in relation to growth and infrastructure. The spatial relationships between cities and their services and activities are of particular importance for the planning of strategic transport networks. In particular, the FDS should include recognition of the following:

    - Identification and understanding of issues and opportunities in relation to cross-boundary growth and infrastructure to the north with Te Tai Tokerau and to the south with Waikato.

    - Recognition of spatial planning initiatives undertaken in neighbouring regions, particularly those under the Urban Growth Agenda. This should include Future Proof and the Hamilton-Auckland Corridor Plan.

    - Specifically for the transport system, acknowledge the opportunities to enable stronger multi-modal connections between Auckland and Tai Tokerau and Waikato.

    - A potential implementation action could be for further cross-boundary spatial planning.

Implementation Actions

41. Waka Kotahi agrees that the FDS needs to be supported by strong policy and implementation frameworks, and in particular the FDS implementation plan that is required under clause 3.18 of the NPS-UD. Waka Kotahi seeks to continue to work with Auckland Council on the development of the implementation plan.

42. Waka Kotahi is generally supportive of the three categories of implementation identified in Part 5 and Appendix 12:
    - Changes to the Auckland Unitary Plan
    - Investment Prioritisation
    - Advocacy, research and non-statutory approaches

43. A key finding of the Waka Kotahi Auckland Strategic Spatial View is the increased uncertainty on where and when growth will occur. Waka Kotahi suggests that the FDS would benefit if greater clarity was provided on how this uncertainty will be addressed, for example:
    - Ways to encourage growth in some areas.
    - Ways to discourage growth from other areas.
    - Responses to growth in market attractive areas.

44. As part of implementation plan, Waka Kotahi supports Council undertaking the following:

    - Structure and catchment planning outlined in the implementation actions, particularly to support VKT and transport emission reduction outcomes aligned with the ERP. We support more detailed spatial planning for key nodes to identify built form, land use and employment outcomes as well as the planning, and investment required to support growth. Waka Kotahi would support the development of a programme or prioritisation framework for future planning initiatives.

- Changes to the Regional Policy Statement following adoption of the Future Development Strategy to strengthen the RMA policy framework to enable and manage growth.

- Improved analysis and explanation of financial policies and exploring new financial tools and approaches to fund infrastructure needed to implement the FDS.

- Providing greater clarity and specificity on the 'Advocacy, research and non-statutory approaches' and how they will assist in the implementation of the FDS.

Waka Kotahi wishes to be heard in support of this submission.

Signature of person authorised to sign on behalf of Submitter:

[redacted]

Future Development Plan 2023 #8130

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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?

Other

Tell us why
Please see attached.

Accessible local centres

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

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

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

Other

Tell us why
Please see attached.

Avoiding hazards

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

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

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

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

Other

Tell us why
Please see attached.

Resilient infrastructure

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

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

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

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

Other

Tell us why
Please see attached.

Other feedback

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

Please see attached.

#8130

UNDER the Resource Management Act 1991

AND

IN THE MATTER of a submission by **FLETCHER DEVELOPMENT LIMITED** to **AUCKLAND COUNCIL** on the draft Auckland Future Development Strategy

SUBMISSION BY FLETCHER DEVELOPMENT LIMITED ON THE DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY

1. INTRODUCTION

1.1 This submission is made on behalf of Fletcher Development Ltd ("FDL") on the Auckland draft Future Development Strategy ("Draft FDS").

1.2 FDL is the industrial development arm of Fletcher Building. FDL is a major provider of industrial development land and the development of industrial premises. Specifically, FDL acquires and develops industrial land to support Fletcher Building's broad property requirements and also develops land for sale to third parties.

1.3 FDL delivers significant capital investment projects within key growth areas across the Auckland region. Among FDL's landholdings is a large land parcel at Silverdale West, which is addressed in detail in this submission to demonstrate the impact of the Draft FDS. FDL is working collaboratively with Fulton Hogan Land Development Limited ("FHLD") on a plan change to rezone over 100 hectares from Future Urban zone ("FUZ") to Light Industrial zoned, in accordance with the Silverdale West Structure Plan adopted by Auckland Council ("Council" or "AC") in April 2020.

Overview and scope of the submission

1.1 FDL strongly opposes the Draft FDS, which will have a very significant impact on FDL's ability to deliver development ready land to meet the needs of not just Fletcher Building businesses but also other small and large business land users across Auckland. FDL is deeply concerned that the Draft FDS appears to have been prepared with only superficial consideration of existing business land availability, the broad range of industrial activities/requirements that cannot be met with infill development only, and the benefits of aligning business and residential community development.

1.2 Providing sufficient development ready land which caters to the users of business land's broad range of requirements is essential to enable businesses to meet the service, production, and distribution needs of the Auckland community, which in turn stimulates economic development and generates employment opportunities in Auckland.

1.3 The effective moratorium on the release of business land in the FUZ for the next 10 years is likely to severely constrain economic opportunity and will also escalate land prices, compounding the effects on the economy.

1.4 The Draft FDS will also have the unintended consequence of increasing the need for private vehicle travel by constraining industrial and commercial development in areas that are already experiencing growth in residential development, meaning more people will have to travel longer distances to work by private vehicle. This is the antithesis of what the Draft FDS is intended to achieve.

1.5 This submission addresses key issues identified in the Draft FDS in relation to business land capacity. The matters identified in this submission should not be treated as exhaustive as the problems with the Draft FDS are extensive and could not all be captured in the limited time available.

1.6 This submission addresses the following:

(a) The failure to comply with the requirements of the National Policy Statement on Urban Development 2020 ("NPS-UD") (Section 3);

(b) The approach in the Draft FDS to consideration of the spatial growth scenarios and intensification options (Section 4);

(c) The likely effects of the Draft FDS on business land affordability and choice (Section 5);

(d) Issues arising in respect of infrastructure provision (Section 6);

(e) The particular concerns arising in respect of Silverdale West (Section 7);

(f) The proposed implementation measures (Section 8);

(g) The consultation process (Section 9); and

(h) FDL's conclusion and requests to the Council regarding the Draft FDS (Section 10).

1.7 A summary of this submission is contained in Section 2.

Separate submission by Fletcher Residential Limited

1.8 A separate submission has been lodged by Fletcher Residential Limited ("FRL") in relation to the likely effects of the Draft FDS on residential capacity and demand. These two submissions have been prepared together and raise some of the same issues. In order to ensure that they can each be read as standalone documents, there is some duplication across the two submissions.

Supporting technical reports

1.9 FDL's expert team has undertaken a detailed technical analysis of the Draft FDS. This submission has been informed by the following technical reports, which are appended to this submission:

(a) *Analysis of the Auckland Council Draft Future Development Strategy 2023: Impact on the Provision of Land for Business Report to Fletcher Building* Tattico Limited **(Attachment A)**;

(b) *Economic Review of Auckland Council's Draft Future Development Strategy (FDS)* Insight Economics **(Attachment B)**; and

(c) *Transport Feedback on the Draft Future Development Strategy* Flow Transportation Specialists **(Attachment C)**.

2. SUMMARY

2.1 The Draft FDS is fundamentally flawed. It fails to give effect to the requirements of the NPS-UD and, if implemented, will starve the market of much needed boosts in the supply of business land to rectify existing shortfalls and keep pace with projected growth in demand. It will push up land prices and thereby undermine affordability for businesses looking to establish, expand, or relocate within the region, likely causing some businesses to be displaced to other regions.

Failure to comply with NPS-UD requirements

2.2 The Draft FDS does not meet the requirements of the NPS-UD. Specifically:

(a) It ignores the economic focus of the NPS-UD and rather than supporting the effective functioning of land and development markets, is instead focussed on preventing further growth.

(b) There are significant capacity shortfalls for business land in Auckland, evidenced by historically low vacancy rates prevailing in many of the region's business property markets. The Draft FDS needs to rectify this, not exacerbate it.

(c) Infrastructure funding constraints have been used as a rationale to place a moratorium on growth, despite the availability of many alternative funding mechanisms. The Draft FDS contains no discussion of alternative solutions at all.

(d) No Business Capacity Assessment has been completed, which means that the Draft FDS has been prepared without all of the necessary information.

(e) Even absent of a Business Capacity Assessment, the Draft FDS acknowledges that the growth strategy does not comply with the requirement in Clause 3.3 of the NPS-UD to provide "at least" sufficient development capacity for business land over the short and medium term.

(f) In addition, there is no consideration of whether development capacity is "suitable to meet the demands of different business sectors." The growth models relied upon assume that there will be infill opportunities and Gross Floor Area ("GFA") available above ground floor level, i.e. multi levelled industrial buildings. This is not consistent with realistic land requirements and business trends in Auckland.

(g) The Draft FDS is also silent on the competitiveness margin over and above the expected demand for business land. It is therefore unclear whether a competitiveness margin has been included.

(h) The Draft FDS assumes that servicing greenfield development is more expensive than brownfield development, when in fact, having regard to the many constraints faced when retrofitting infrastructure in an existing urban area, this is often not the case.

(i) No consultation has been undertaken with the development community, which would have provided the Council with information critical to making informed decisions on these issues.

2.3 Overall, the Draft FDS's approach to business land is reckless. It will starve the market of much needed boosts in supply to rectify existing shortfalls and keep pace with projected growth in demand, and will also push up land prices and thereby undermine affordability for businesses looking to establish, expand, or relocate within the region.

Flaws in options analysis

2.4 The options analysis undertaken to assess the different growth scenarios is poorly conceptualised and replete with errors, such that its conclusions cannot be relied upon to support the chosen growth strategy.

Implementation measures

2.5 The proposed implementation measures, including making changes to the Regional Policy Statement ("RPS") seek to relitigate matters that were comprehensively addressed by the Independent Hearings Panel ("IHP") on the Auckland Unitary Plan ("AUP"). The approach proposed in the Draft FDS was resoundingly rejected by the IHP, which found that it would likely have major consequences for land prices and housing affordability.

FDL's request

2.6 Having regard to the above, FDL requests that the Council pauses the current programme on the Draft FDS and initiates meaningful consultation with the community, including the residential development sector, as required by Clause 3.13 of the NPS-UD.

2.7 In respect of Silverdale West, FDL requests that:

(a) That the Draft FDS process be paused and meaningful engagement held with FDL and its development partner, FHLD, in relation to Silverdale West;

(b) That the Council receive and process its pending private plan change application for Silverdale West based on current operative policies without deferment or delay and without giving consideration to future, and unadopted, provisions of the Draft FDS; and

(c) As a bare minimum, any new iteration of the Draft FDS, or amendment to the Draft FDS, should:

(i) Identify Silverdale West as a committed growth area; and

(ii) Show Stage 1 of Silverdale West as development ready in the 2023-2030 time period.

3. FAILURE TO COMPLY WITH NPS-UD REQUIREMENTS

3.1 The Council has a legal obligation to prepare a future development strategy which meets the requirements of the NPS-UD.

3.2 The Draft FDS does not meet the requirements of the NPS-UD, for the following reasons:

Failure to support competitive land and development markets

3.3 At a fundamental level, the Draft FDS runs directly counter to the imperative in the NPS-UD to support competitive land and development markets, representing an effort to curtail greenfield urban growth in Auckland.

3.4 The Council's assertion that the requirement to deliver "well-functioning urban environments" has shifted the focus of the NPS-UD from an economically focussed policy (per the National Policy Statement on Urban Development Capacity ("NPS-UDC")) to

one that incorporates a range of non-economic factors which may override the economic imperative is incorrect.[1]

3.5 The strong economic focus reflected in the NPS-UDC has not been superseded. There remains a strong directive in the NPS-UD for local authorities to deliver greater land supply and support housing affordability. In this regard, the Environment Court has described the purpose of the NPS-UD as follows:[2]

> *"The NPS-UD has the broad objective of ensuring that New Zealand's towns and cities are well-functioning urban environments that meet the changing needs of New Zealand's diverse communities. Its emphasis is to direct local authorities to enable greater land supply and ensure that planning is responsive to changes in demand, while seeking to ensure that new development capacity enabled by councils is of a form and in locations that meet the diverse needs of communities and encourage well-functioning, liveable urban environments. It also requires councils to remove overly restrictive rules that affect urban development outcomes in New Zealand cities."*
>
> *[emphasis added]*

3.6 The Draft FDS enables less, rather than greater land supply. It also seeks to make planning less responsive to changes in demand, by proposing changes to the planning documents to implement more restrictive rules, controlling urban development outcomes. This is not what the NPS-UD requires and, as discussed below, is likely to have a chilling effect on Auckland's economy and housing affordability.

Business Capacity Assessment not available

3.7 The NPS-UD provides for the preparation of a Housing and Business Capacity Assessment, which is the key tool to be used to understand and quantify supply and demand for housing and business land in the region. Under Clause 3.2 the Housing and Business Capacity Assessment is required to identify demand from each business sector for additional business land in the region.

3.8 Clause 3.14(a) of the NPS-UD requires that the Draft FDS must be informed by the most recent applicable Housing and Business Capacity Assessment. However, no Business Capacity Assessment has been completed and the Draft FDS relies upon unpublished data which has not been peer reviewed or made available for public review.

3.9 The current status of the Business Capacity Assessment means that the Draft FDS has been prepared without all of the information available to make informed decisions about matters critical to Auckland's future growth. The Draft FDS is therefore significantly premature and submitters can have no confidence that its conclusions are correct.

Failure to provide sufficient development capacity to meet demand for business land

3.10 Clause 3.3 of the NPS-UD requires that every tier 1 local authority must provide at least sufficient development capacity to meet the expected demand for business land:

(a) From different business sectors; and

(b) In the short term, medium term, and long term.

1 *Future Development Strategy – Overall Evidence Report for Consultation* (Auckland Council, June 2023) at 101.

2 *Middle Hill Limited v Auckland Council* [2022] NZEnvC 162 at [33].

3.11 In order to be sufficient to meet expected demand for business land, the development capacity provided must be:

(a) Plan-enabled; and

(b) Infrastructure-ready; and

(c) suitable to meet the demands of different business sectors; and must

(d) Meet the expected demand plus the appropriate competitiveness margin of 20% for the short and medium term and 15% for the long term.

3.12 While the Business Capacity Assessment is not available to enable submitters to understand whether these requirements have been met, the Draft FDS states that the draft Business Capacity Assessment indicates that:[3]

> *"…there is likely to be at least sufficient plan-enabled business capacity on an aggregate region-wide basis. Shortfalls in some sub-regions, or for specific business sectors, particularly for land extensive sectors could occur in the short to medium-term. Over the medium to long-term these are planned to be addressed by the provision of additional business-zoned land, including through the provision of centres in new development areas."*

3.13 It appears, therefore, that the Draft FDS does not comply with the requirements of Clause 3.3 of the NPS-UD to provide "at least" sufficient development capacity over the short and medium term.

3.14 In addition, the focus on delivering sufficient "plan enabled" business capacity does not meet the requirements of Clause 3.3 to deliver sufficient capacity which is "suitable to meet the demands of different business sectors."

3.15 While there may be theoretical potential in the redevelopment of existing employment areas, the reality is that this is seldom financially viable - particularly compared to residential - so it will not occur.

3.16 The growth models that have been used by the Council to support the Draft FDS assume that there will be infill opportunities and GFA available above ground floor level, i.e. multi levelled industrial buildings. While FDL supports these concepts in principle, the reality is that they will only deliver limited opportunities. In this regard:

(a) Infilling of industrial areas only works where the land size shape and contour are fit for purpose. This is often a significant constraint to infill industrial premises.

(b) Secondly, building height can only be of limited use to achieve efficiencies. Vertical multi floored industrial facilities are not proven in New Zealand and are simply uneconomic and not practical.

3.17 It appears therefore, that the analysis underpinning the Draft FDS has not been prepared based on realistic land requirements, proven technologies and business trends in Auckland, as required by the NPS-UD.

3.18 The Draft FDS is also silent on the competitiveness margin over and above the expected demand for business land. It is therefore unclear whether a competitiveness margin has been included.

3 *Future Development Strategy – Overall Evidence Report for Consultation* (Auckland Council, June 2023) at 31.

Failure to engage with development sector

3.19 Clause 3.15 of the NPS-UD requires that the Council engage with the development sector in the preparation of the Draft FDS to:

> *"identify significant future development opportunities and infrastructure requirements."*

3.20 This reflects an intention that local authorities and land developers should work constructively together to deliver urban growth.

3.21 FDL understands that the only members of "the development sector" that the Council has engaged within the preparation of the Draft FDS are the Property Council New Zealand ("PCNZ") and Kainga Ora. As a government agency undertaking largely brownfield development, Kainga Ora offers a specific perspective on urban development that is not the same as that of the private sector. Similarly, while the PCNZ purports to represent the interests of its members (and many of the national-scale development companies are not members), it has no experience in development itself.

3.22 We also understand that the Council has undertaken a survey to ascertain the development intentions of developers in Auckland. FDL did not receive an invitation to participate in this survey and indeed a survey of PCNZ's members has indicated that 93% those surveyed had not been contacted by the Council.[4]The Council has not engaged with FDL or any of the other major developers in Auckland, all of whom could have provided information critical to a full understanding of Auckland's development market and the considerations that are relevant to successful delivery of urban development. This failure to consult is immediately apparent on the face of the Draft FDS, which contains numerous assumptions and assertions which are simply incorrect and could easily have been clarified by the development sector.

3.23 Very substantial investment decisions have been made across Auckland based on the Council's decision making on urban growth to date, as provided for in the Auckland Plan, AUP and the Future Urban Land Supply Strategy ("FULSS"). In many cases, developers have advanced development proposals for their land which have now been thrown into jeopardy by the Draft FDS.

3.24 This potentially has major implications for the economic wellbeing of the development sector and all industries (civil engineers, earthworks companies, house builders, tradespeople, etc) who rely on the development sector for their business. Despite its potentially disastrous effect, the Draft FDS includes no discussion of these issues.

4. SPATIAL GROWTH SCENARIOS AND INTENSIFICATION OPTIONS

4.1 Clause 3.14 of the NPS-UD requires that the spatial strategy is informed by "*consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS."*

4.2 The *Growth Scenarios Evidence Report* ("GSER") prepared to inform the Draft FDS includes an analysis of four growth scenarios representing different spatial options for land uses (Climate, Intensive, Compact, and Expansive) to accommodate growth over the next 30 years.[5] It states that the scenarios have been tested against a "*multi-criteria analysis relying on modelling outputs as well as quantitative and qualitative information*."[6]

4 Presentation on "Auckland Future Development Strategy" (Property Council New Zealand, July 2023).
5 *Auckland Future Development Strategy - Growth Scenarios Evidence Report for Consultation* ("GSER") (Auckland Council, June 2023).
6 GSER at 4.

4.3 FDL has undertaken a comprehensive review of the spatial scenario analysis and identified numerous flaws which undermine the validity of the analysis and conclusions.

Inclusion of implausible options

4.4 The process used to derive the four options has a major bearing on the overall direction and likely findings of the analysis. Of particular concern is the inclusion of an unrealistic benchmark scenario (Scenario A) that assumes different development patterns, home and job locations, and travel habits to the other three scenarios, but which are often masked or not properly acknowledged, causing the other three scenarios to be unfairly assessed.

4.5 The GSER states that "*four growth options were developed, representing different spatial options for land use, accommodating a consistent quantum of Auckland's growth and change in dwellings and jobs over the next 30 years*."[7] Similarly, on page 5, the report records that: "*four alternative growth scenarios were developed, each representing a different urban form."*[8] These descriptions indicate that the four scenarios are equally plausible but differ (mainly) in their associated urban form. However, that is not the case.

4.6 There are fundamental differences between Scenario A and the other three scenarios. Whereas the first three scenarios were derived via workshops held with subject matter experts, Scenario A was derived during the development of the Transport Emissions Reduction Pathway ("TERP") by a smaller subject matter expert group to "*reflect a spatial distribution world where climate mitigation and adaptation interventions and land use planning were prioritised over other goals and objectives for the region*." As a result, Scenario A is based on different (and unrealistic) assumptions which make it incomparable to the other scenarios and a poor benchmark for evaluating those other scenarios. For example, the report states:[9]

> *"The evaluation found little difference between the scenarios in terms of model outputs relating to travel behaviour, except for Scenario A which…deliberately [included] significant shifts in land use patterns and transport assumptions."*

4.7 Scenario A incorporates fundamentally different, unsubstantiated transport assumptions that defy any like-for-like comparison with the other scenarios, including that:[10]

(a) People with office jobs work from home 1 day per week (which is about triple the rate assumed for the other three scenarios);

(b) Public transport fares are $2 per trip forever (regardless of trip length/mode); and

(c) The uptake of active travel modes is much greater than in the other scenarios.

4.8 Scenario A also assumes much higher levels of job and housing growth "*to enable the model to make more decisions on uptake of development capacity including providing a significantly more mixed-use environment to support more dispersed employment locations"*.[11] Consequently, Scenario A assumes much closer spatial matches between

7 GSER at 4.
8 GSER at 5.
9 GSER at 8.
10 GSER at 19.
11 GSER at 13.

the locations of new jobs and new homes than the other scenarios, which directly bolsters its modelled travel benefits.[12]

4.9 Further, Scenario A assumes that relatively high-density development will occur throughout the region, even in remote rural areas, with 80% of future dwellings in rural nodes expected to be "attached" versus only 20% currently.[13] Finally, Scenario A withdraws capacity outside areas for intensification "*as a way to influence the model to respond according with the scenario narrative*."[14] Scenario A is therefore neither plausible nor realistic, so including it is inappropriate as it sets an unfair benchmark against which other scenarios are assessed.

4.10 Similarly, Scenario D is not credible because it reflects a highly dispersed urban form that is also a major shift from the current approach. Scenario D sees only 52% of new homes inside existing urban areas, with 48% in the FUZ and rural areas. This implied future spatial direction is a wholesale departure from the agreed "70/40" split underpinning the current strategy reflected in the AUP and thus also has no real-world basis.

4.11 In summary, therefore, two of the four options have limited real-world value for determining the optimal way to accommodate growth in homes and jobs over time, which undermines the validity of the entire exercise.

Absence of status quo option

4.12 There is also no scenario representing the status quo. This is highly unusual, because the default course of action for virtually every options assessment is to simply "do nothing". Absent of such an option in the assessment, it is impossible to properly compare the potential impacts of the different scenarios to the current evidence-based trajectory.

Flaws in assessment criteria

4.13 It is apparent that no objective assessment of the scenarios has been undertaken. The criteria used to assess options should be identified independently from the options themselves to avoid potential bias, especially when scores depend on experts exercising their professional judgement. Instead, the criteria appear to have been derived from the scenarios, resulting in a circularity between the scenarios and the assessment. Because of this, the Draft FDS records that the results are "thematic",[15] therefore undermining the validity of the exercise.

4.14 The assessment criteria also fails to consider areas of common ground and instead focuses only on differences between the options. Specifically, page 21 of the GSER lists evaluation themes (i.e. criteria) that were initially deemed important, but were later disregarded entirely or considered only fleetingly because the evaluators decided to consider only points of difference. The report states that *"Having considered the range of criteria identified, it was then determined that only criteria that would differentiate the scenarios should be taken through into the evaluation process."* [16]

4.15 While the differences may be of greater analytical interest than commonalities, omitting criteria where the scenarios perform similarly systematically distorts the nature and extent of the differences between the options. Furthermore, several key issues are not

12 This can be seen on page 15, where the assumed locations of new jobs and homes is almost perfectly spatially aligned in Scenario A compared to the other scenarios.
13 GSER at 20.
14 GSER at 13.
15 GSER at 8.
16 GSER at 22.

covered in any meaningful detail (presumably because the evaluators considered them areas of common ground), including: [17]

(a) Development feasibility;

(b) Housing affordability; and

(c) Ensuring there is enough land for business.

4.16 Meanwhile, transport impacts and accessibility account for 11 of 29 criteria (38%), compared to only two criteria for natural hazards and climate change adaptation/mitigation (7%). This means that transport and accessibility effects receive more than five times the weight of climate change adaptation and mitigation effects in the growth options assessment (i.e 38% vs 7%).

4.17 While transport issues are important, the FDS can only have a very limited impact on the region's future emissions profile because most of the urban form is already fixed. Further, light passenger vehicles account for only a modest fraction of national CO_2 emissions. In this regard, the latest Greenhouse Gas Inventory (published in 2023) shows that cars produce only 8% of total (gross) CO_2 emissions[18] and average CO_2 emissions of cars are already falling due to rapid shifts towards electric, hybrid, and other low-emissions vehicles. By 2050, petrol cars will account for just over 10% of total Vehicle Kilometres Travelled ("VKT"), with hybrid and electric cars accounting for more than 70%.[19] Therefore:

(a) Policies aimed at curbing Green House Gas ("GHG") emissions from cars will have limited impacts on meeting national emissions targets; and

(b) Seeking to reduce CO_2 emissions via the spatial location of new jobs and homes will have very little impact overall.

4.18 Thus, while reducing vehicle emissions (particularly in the short term) is important, this is not an appropriate primary focus for the Draft FDS.

Inclusion of flawed assumptions and processes

4.19 Some of the model's inputs are out-of-date. For example, the modelling assumes the need to accommodate an extra 408,000 dwellings and 380,000 jobs over the next 30 years, compared to only about half that amount in the Draft FDS itself. By modelling much higher levels of growth than are now anticipated, the analysis overstates the travel (and GHG emissions) impacts of each option.

4.20 Other inputs of concern include the unreferenced and unsubstantiated assumptions that:

(a) A city centre cordon and road pricing are in effect from 2031 and 2041, respectively.[20]

(b) Infrastructure required for all options is technically feasible.[21]

17 GSER at 22; see the list of initial criteria themes in Box 3.

18 Ministry for the Environment "About New Zealand's Greenhouse Gas Inventory" (27 May 2021) <www.mfe.govt.nz/climate-change/state-of-our-atmosphere-and-climate/new-zealands-greenhouse-gas-inventory>.

19 **Error! Hyperlink reference not valid.**Jayne Metcalfe and Serge Peeters "Vehicle Emissions Prediction Model VEPM 6.3 update technical report" (28 April 2022) Emission Impossible Ltd and M&P Consulting Ltd <www.nzta.govt.nz/assets/Highways-Information-Portal/Technical-disciplines/Air-quality/Planning-and-assessment/Vehicle-emissions-prediction-model/VEPM-6.3-technical-report-2022.pdf>.

20 GSER at 17.

21 GSER at 18.

4.21 Infrastructure requirements for the FUZ have been closely studied, but this is not the same for the infrastructure required to support widespread intensification under Plan Change 78 ("PC 78"). As discussed in Section 6 below, there is significant uncertainty that the infrastructure upgrades needed to support the intensification enabled by PC 78 are feasible.

4.22 The reliability of the model's processes, and hence outputs, is also a concern. For example, page 12 of the GSER records that the model crashes and breaks if there is insufficient capacity, which raises concerns about its robustness and reliability. Further, page 18 of the GSER records that the model has limitations in relation to capturing behaviour change even though that is critical to realising the alleged benefits of certain scenarios. At page 24, the GSER states that:

> *"To direct 'take up' to specific locations sometimes required plan-enabled capacity to be reduced or capped to limit take up and force the model to develop in accordance with the scenario narrative."*

4.23 Interfering with the model's operation and forcing it to take actions that suit a scenario narrative directly invalidates its outputs and casts serious doubt over the objectivity of the overall modelling process itself.

Flaws in approach to scoring

Reliance on subjective assessment

4.24 The majority of criteria were primarily subjectively evaluated by subject matter experts.[22] It is therefore essential that an appropriate mix of experts is used to assess them. However, the number of experts engaged, their qualifications, experience, and areas of expertise are not recorded. The expert group is recorded as comprising only members of the (unnamed) project team plus subject matter experts from Council departments and Council Controlled Organisations ("CCOs"). This raises concerns that a sufficiently deep and broad mix of expertise has not been utilised. There has also been no expert input from any other key stakeholders, such as the development community, which reduces the credibility and reliability of the scores.

Flaws in assessment measures

4.25 In addition, the measures against which criteria were assessed contain numerous flaws. In this regard:

(a) Access to open space is measured by the number of households and people within a walkable catchment of an open space that is at least 3000m^2.[23] Not only is this size threshold arbitrary, but the criterion itself does not consider the quality of the experience, nor the likelihood of congestion occurring at existing parks in scenarios with high intensification.

(b) The extent to which population is exposed to harmful air emissions from transport focusses on the *generation* of emissions, not the population's *exposure* to them.[24] This is highly misleading given the criterion's title, and it directly obscures the likely health impacts of scenarios that rely on high levels of intensification (such as Scenario A). Instead, this criterion assigns Scenario A the highest score possible.

22 GSER at 25; Natural hazards, Carbon emissions, Housing choice, Biodiversity, Health of water bodies, Water quality, Highly productive soils, Natural and built heritage, Access to social infrastructure, Air quality, Māori and cultural landscapes, Costs of development, Infrastructure and Market feasibility.
23 GSER at 36
24 GSER at 37.

(c) Access to social infrastructure was defined to include access to hospitals via active modes or public transport.[25] Hospitals are visited only rarely, and when they are accessed, it is usually in a hurry via a car or ambulance. Accordingly, the accessibility of hospitals via public transport and active modes is a crude and very narrow way to measure each option's access to social infrastructure.

(d) Similarly, access to social infrastructure and employment in high deprivation areas is partly based on accessibility to tertiary education via active modes or public transport.[26] However, very few regional residents are enrolled in tertiary education, so this is an unduly narrow way to measure the overarching criterion. Further, many people are now regularly accessing tertiary education online.

No reflection of cardinal modelling

4.26 Another issue arising in respect of the scoring is that the cardinal nature of the modelling outputs is not reflected in the multicriteria analysis scores. For example, an option may have scored only slightly better than another on a specific criterion according to the modelling, but the scores imply that it performed two or three times better overall. This issue affects at least three of the 29 criteria, including:

(a) The extent to which scenarios impact carbon emissions;[27]

(b) Mixed use communities;[28] and

(c) Accessibility to key economic activity.[29]

Inconsistency/errors in scoring

4.27 In addition, the scoring for several criteria does not reflect the preceding discussion. This issue affects at least three of the 29 criteria, including:

(a) The degree to which urban development consumes highly productive land.[30] For this criterion, Scenario C was scored as negative two because of its FUZ land despite the preceding discussion clearly stating that FUZ land is exempt from the requirements of the National Policy Statement on Highly Productive Land;

(b) Housing choice;[31] and

(c) Access to social infrastructure.[32]

Failure to weight criteria

4.28 Finally, the evaluation does not weight the criteria. This is highly unusual, and it directly elevates the importance of some factors while systematically downplaying others. That is because, absent of weighting, the more criteria per theme, the greater the weight afforded that theme in the evaluation, and vice versa. For example, suppose that one theme is measured by ten criteria, while another theme is measured by only two criteria. If weights are not applied, the first theme carries five times as much weight in the

25 GSER at 40.
26 GSER at 41.
27 GSER at 32.
28 GSER at 40.
29 GSER at 45.
30 GSER at 35.
31 GSER at 39.
32 GSER at 42.

overall assessment than the other. Usually, this is addressed by applying weighting that mitigate differences in criteria breadth and depth, but that is not the case here.

4.29 The following table puts the issue in context by showing the share of the 29 criteria that fall into (our suggested) evaluation themes, and the implied weighting on each overall:

Evaluation Themes	Number of Criteria	Implied Weight
Travel Impacts/Accessibility	11	38%
Environment	4	14%
Land & Housing Markets	4	14%
Social/Culture/Heritage	2	7%
Economy	2	7%
Infrastructure	2	7%
Māori	2	7%
Natural hazards/Climate adaptation	2	7%
Total	**29**	**100%**

Number of Criteria and Implied Weighting by Evaluation Theme

4.30 The result is that some themes have been given excess weight at the expense of others, without explanation, distorting the overall assessment.

Summary

4.31 It is apparent from the above that the consideration of spatial growth scenarios that has informed the Draft FDS is replete with baseless assumptions, inconsistencies and errors.

4.32 It is therefore of little assistance in terms of identifying the appropriate strategy for urban growth in Auckland and cannot be relied upon to justify the strategy set out in the Draft FDS.

5. FAILURE TO PROVIDE SUFFICIENT BUSINESS LAND CAPACITY

5.1 The Draft FDS acknowledges that there will be shortfalls "*in some sub-regions, or for specific business sectors, particularly for land extensive sectors*" in the short to medium-term.

5.2 The focus in the Draft FDS on travel impacts and accessibility assumes that more intensive development of greater employment generating land uses in or adjacent to existing residential areas. In adopting this approach, the Draft FDS seems to overlook the reality that many existing urban areas are almost fully built-out, with only very limited scope for growth, particularly for the broad range of business land requirements.

5.3 Further, there are already shortfalls in business land capacity in Auckland. The Insight Economics report states:[33]

> *"We agree that there will be shortfalls in business capacity over the short- to medium-term for certain parts of Auckland and/or specific business sectors. reflected in the current, historically low vacancy rates prevailing in many of the region's business property markets.*
>
> *For example, a Colliers research report for the first quarter of 2023 noted that the region's industrial property market had reached a historically low level of vacancy, with the vacancy rate for prime industrial properties falling to only 0.5%. In some southern industrial*

33 *Economic Review of Auckland Council's Draft Future Development Strategy (FDC)* (Insight Economics, July 2023) at 24.

> *areas, such as Manukau/Wiri and East Tamaki, there were virtually no vacancies as at the time of their survey. This is a concern, because a lack of vacant premises stifles opportunity and may even cause some businesses to be displaced to other regions, such as the large new business area in Pokeno."*

5.4 It is incumbent on the Council (and required by the NPS-UD) to rectify this issue. The Draft FDS fails to do so – and instead, compounds the issue by further constraining growth pushing up land prices and thereby undermining affordability for businesses looking to establish, expand, or relocate within the region.

5.5 The Draft FDS provides for no greenfield expansion until at least 2030. Of the areas identified for growth prior to 2030, the only two locations with a good supply of industrial land are Westgate-Whenuapai, in the north west, and Drury, in the south. There is limited supply elsewhere. This is a particular problem in the north, where residential development is continuing at pace but no industrial development has been enabled to support it, as discussed in Section 7 below.

Failure to consider needs of distribution sector

5.6 A particular concern is that insufficient consideration has been given to the needs of the distribution sector. This requires large flat vacant land to accommodate its increasingly sophisticated automation and larger facilities it requires. These types of facilities are typically located in new industrial estates which have been designed to accommodate such facilities. There is a risk that turning off the supply of such development will have a major impact on the ability of the distribution sector to locate in Auckland.

Need for greater supply

5.7 It is essential that Auckland's supply of business land keeps pace with economic growth and industry standards. Land supply needs to meet the required site and location characteristics, in terms of access to transport, contour and lot size. This is a significantly higher constraint than residential land where there is far greater flexibility to accommodate and work with size, shape and contour of land.[34]

5.8 Accordingly, new business land *will* be required in the FUZ to keep pace with residential growth and to address historic and existing home/job balances in the region's greenfield areas.

5.9 It is critical that any growth strategy provides opportunities across the region, rather than only in one or two locations. The acknowledgement that there will be shortfalls in some sub-regions (i.e. the north) is a direct result of the decision to constrain the development of the FUZ.

5.10 This is likely to have a significant impact on productivity, will increase market prices and will also lead to many more people having to travel significant distances to work, likely by private vehicle.

6. INFRASTRUCTURE PROVISION

6.1 It is apparent that the key factor underpinning the Draft FDS is the significant budget constraints currently faced by the Council. The Council's response is to put a moratorium on growth until funding issues are resolved and infrastructure can be funded.

6.2 The problem with this approach is that demand for housing and business development will continue, notwithstanding the Council's financial position. The focus on

34 *Auckland Council Draft Future Development Strategy 2023 – Impact on the Provision for Business Report to Fletcher Building* (Tattico Limited, July 2023) at [3.14].

infrastructure constraints rather than what is required to enable economic and community development represents "the tail wagging the dog". Managing the pace of growth is a tool that distorts the market and undermines industrial land affordability, as proven over the last decade.

6.3 The Draft FDS is entirely silent on other funding options available to fund infrastructure. In fact, there are many other options available that could be explored to enable the coordinated release of greenfield land, including:

(a) Private sector funding of key infrastructure;

(b) The option of partnership arrangements between the private and public sectors to fund infrastructure over time;

(c) Infrastructure funding agreements and the opportunity to build in mechanisms to fund work as land owners benefit from early infrastructure investment; and

(d) Utilisation of the tools in the Infrastructure Funding and Financing Act 2020.

6.4 The Draft FDS appears to assume none of these are applicable or workable. Having regard to the potentially significant economic consequences of constraining growth in the manner proposed, equal energy should be put into identifying innovative proposals that could work on targeted growth areas.

6.5 In addition, the Draft FDS appears to reflect the position that it is necessary for all major infrastructure upgrades to be funded and/or in place before land can be rezoned. That is unnecessary and in fact represents poor planning practice. The NPS-UD requires that urban development is "integrated" with infrastructure planning and funding decisions. As the IHP on the Drury East Plan Changes observed:[35]

> *"The essence of integration is that those matters happen contemporaneously, in a complementary way, and over time….*
>
> *A sequential approach…would compromise the potential for urban zoning and development to occur in a timely and integrated fashion ... That is because live zoning provides certainty and gives confidence to landowners (and central and local government agencies) that expenditure on infrastructure will be worthwhile and efficient."*

6.6 It is unnecessary, and potentially economically wasteful, to require all infrastructure required to support a large, staged development to be present at the outset. Implementing infrastructure before it is required can incur unnecessary financing costs over the period when it is unused or under-utilised. Some infrastructure, such as waste water networks, require a critical volume to operate efficiently, and so unused or under-utilised periods can lead to technical issues. It also prevents funds from being applied to other infrastructure that will be needed sooner. Once implemented, infrastructure needs to be maintained, which incurs costs. Installing infrastructure only when it is needed avoids those interim maintenance costs.

Infrastructure triggers

6.7 The analysis which has informed the infrastructure "triggers" for future land release has been undertaken at a coarse scale, and the actual infrastructure requirements required to service land will vary depending on factors including the nature of the development, infrastructure solutions proposed and the status of development on neighbouring sites.

35 *Proposed Private Plan Change 49 - to the Auckland Unitary Plan, Decision following the hearing of a Private Plan change under the Resource Management Act 1991* (Auckland Council, August 2021) at [179]-[180].

6.8 Over time, infrastructure requirements and solutions are likely to change. For example, the transport projects listed are (for the most part) those set out in the Regional Land Transport Plan ("RLTP"), which is subject to review and changes every six years. Further, Appendix 3 of the Draft FDS records that two key transport documents are currently being finalised, being the Auckland Rapid Transit Plan ("ARTP") and the Tāmaki Makaurau Integrated Transport Plan ("TMTP"). As such, projects and project timeframes are subject to change.

6.9 Although it is proposed that Council will stringently adhere to the infrastructure timeframes set out in the Draft FDS, the Draft FDS also allows timeframes to be reviewed. Using infrastructure upgrades such as Mill Road as an example, it is not reasonable to have development areas controlled by projects where funding may be redirected, be brought forward/pushed out, or removed altogether, which can be based on decisions at a government political level, and therefore out of the control of Council.

6.10 The extent of several projects is significant, such as Mill Road, the North Shore Rapid Transit (extension to Milldale), North-west Rapid Transit and SH16-SH18 Connections. The Draft FDS does not give regard to how these upgrades may be staged, or how interim interventions put in place by the transport authorities may deliver or assist in delivering suitable short to medium term network improvements. For example:

(a) A new Westgate bus station and improvements along SH16 for buses currently being implemented will improve public transport attractiveness and reliability for the North-west, such that the effect between the ultimate outcome (North-west Rapid Transit) and the interim outcome may be relatively minor (more resilient) when considering the timing of development;

(b) The recently completed Northern Corridor Improvements extends the Northern Busway to Albany and therefore assists with improving bus reliability for bus users to the North; and

(c) The provision of bus shoulder lanes in the future on SH1 to Silverdale, where limited interchange crossings exist, would present a feasible, reliable and low cost alternative that benefits bus users, with improved frequencies for local service, delivering a viable medium term solution. This approach is already being applied to SH16.

6.11 It is inappropriate to prohibit development where safe transport solutions can be addressed prior to the ultimate corridor upgrade being delivered.

6.12 The identified corridor upgrades do not only address transport (safety, active modes and capacity) but also include a significant amount of land and cost to improve stormwater improvements (for example, the Coatesville-Riverhead Highway upgrade), requiring private land acquisition. It is unreasonable for the Draft FDS to tie the development of private land to transport upgrades, as:

(a) Private land requires third party land acquisition which only the regulatory authorities can deliver.

(b) Safe, effective and efficient solutions can be delivered by private developers within the existing road reserve, which addresses the transport effects of private development.

6.13 Having regard to the above, while alignment of infrastructure and development over the long term is of course critical, it is unnecessary and inappropriate for infrastructure considerations to control development to the extent that a moratorium is placed on growth until infrastructure is available.

6.14 The appropriate time to consider whether the necessary infrastructure is available to support a greenfield development is at the plan change stage, when the proposed

development and its context is fully understood. There is an established legal position regarding the extent of infrastructure required to service a proposed development or rezoning[36] which can be thoroughly tested via the Schedule 1 process. The current framework which includes placing land use and infrastructure upgrade triggers into planning provisions allows the opportunity for developers to progress (working with the road controlling authorities) transport upgrades, which inevitably saves the roading authorities money.

Carbon emissions

6.15 In terms of carbon emissions, the Draft FDS also appears to be premised on the assumption that concentrating urban growth in the existing urban area will reduce vehicle emissions. There is no evidence to support that assumption.

6.16 To the contrary, enabling the development of well-functioning urban environments, including business development on the urban fringe, will support those areas as self sustaining neighbourhoods in which people can live, work and play, thereby reducing travel requirements.

6.17 Residential growth enabled in recent years has increased the population around Auckland's fringe. However, the development of employment land, and the provision of public transport networks, have not occurred at a similar pace, which in turn requires people to travel large distances to reach employment hubs.

6.18 The Auckland Transport Alignment Project ("ATAP") report that underpins the transport investments included in the Regional Long Term Plan (and the Draft FDS) highlights the:[37]

> *"significant unevenness to future employment accessibility and a growing polarisation of access to employment in the future. By 2046 more than a million people will be living in the western and southern parts of Auckland, nearly half the region's population. However, these areas see relatively little improvement in their access to employment over time."*

6.19 The 2018 Census commuting data shows that a large number of people commute to employment areas where light industrial activities are located, including:

(a) North Harbour Industrial Estate;

(b) Wairau Valley;

(c) Penrose/Mt Wellington/Onehunga;

(d) Henderson;

(e) East Tamaki (Highbrook); and

(f) Auckland Airport.

6.20 The mode of travel for the majority of these trips will be by private car, as frequent and reliable public transport connectivity does not exist to all areas, noting also that many

36 *Landco Mt Wellington v Auckland City Council* [2009] NZRMA 132, *Laidlaw College Inc v Auckland Council* [2011] NZEnvC 248.

37 Ministry of Transport NZ "Auckland Transport Alignment Project (ATAP) – Evaluation report" (September 2016) <www.transport.govt.nz/assets/Uploads/Report/ATAP-Evaluation-Report.pdf> at 15.

light industrial businesses include shift work which makes catching public transport less attractive due to off peak reliability and safety.

6.21 Existing commuter travel patterns are shown in the plan below:

North - Silverdale/Whangaparāoa	Northwest - Whenuapai/Hobsonville/Kumeu
	
Number of commuters to prominent light industrial employment areas – 3,800	Number of commuters to prominent light industrial employment areas – 2,300
Estimated annual private vehicle kilometers travelled (vkt) – 50 million	Estimated annual private vehicle kilometers travelled (vkt) – 20 million
Reduction in vkt if 15% work locally – 7 million vkt	Reduction in vkt if 15% work locally – 3 million vkt
Reduction in vkt if 30% work locally – 15 million vkt	Reduction in vkt if 30% work locally – 6 million vkt
Reduction in vkt if 45% work locally – 21 million vkt	Reduction in vkt if 45% work locally – 9 million vkt

Commuter travel patterns (using 2018 census data)

6.22 Providing employment opportunities closer to the new residential areas established around Auckland's fringe (Whenuapai, Silverdale and Pukekohe) is critical to achieving positive transport outcomes for the region, because it:

(a) Reduces the need to travel by private vehicle across the region to access jobs;

(b) Provides the ability to live, work and play about the same suburb, and substantially reduces VKTs;

(c) Allows more focussed public transport connections/routes to be established. Each area (Whenuapai, Silverdale and Pukekohe) has a nearby Rapid Transit Network ("RTN") station and therefore has the ability to extend or provide shorter and more frequent local bus services between residential and employment areas as they develop; and

(d) Provides safe connectivity for road freight and vehicle-based employment related trips, because each area already has established connectivity to the state highway network.

6.23 In summary, the Draft FDS ignores key accessibility challenges faced by Auckland's growth areas as set out in the ATAP Evaluation Report and does not contribute towards reducing VKTs for those residential areas already established/establishing about the outer areas of the region.

7. SILVERDALE WEST CASE STUDY

7.1 A particular concern for FDL is the implications of the Draft FDS for Silverdale West. As set out in the Tattico Report:[38]

(a) The Auckland Plan, AUP and FULSS all identified the Silverdale-Wainui area as a key growth area for Auckland.

(b) Significant upzoning for housing has been facilitated through the AUP and subsequent plan changes.

(c) The FULSS identified the need to provide additional industrial employment land in the north so as to create a reasonable proportion of job opportunities within the Silverdale-Wainui community. The FULSS identifies the land as scheduled to be development ready in the 2018-2022 time period.

(d) In late 2017, Council commenced work on the Silverdale West Structure Plan. This Structure Plan was entirely focused on industrial development.

(e) The Structure Plan provided for the staged release of industrial land.

(f) The Structure Plan was finally adopted in April 2020, almost 2.5 years after notification.

(g) In 2020, the Council resolved to initiate a plan change to live zone the area for industry. This was seen as critical in terms of economic development, the social drivers relating to employment, and transport in terms of creating more jobs in the north reducing the need for commuting south to Albany and the city centre.

(h) Major companies active in industrial land development purchased into the area and consolidated land holdings reliant on the Council's commitment.

(i) Through COVID, the Council signalled that budgetary constraints had impacted the timing of the Council plan change to undertake the necessary live zoning.

(j) Two primary landowners in Silverdale West Stage 1, FDL and FHLD, set up a collaborative approach to work with the Council to advance a private plan change. This plan change is intended to give effect to the Council's adopted Structure Plan. The private plan change does not seek to change zoning or intensity. It simply facilitates the Structure Plan as the Council would have through a public plan change, if they had the resources.

7.2 As set out in the FULSS, this land should already have been released for industrial development, to create jobs for the significant growth in housing in the Silverdale Wainui area. The Draft FDS proposes to defer this to 2030+.

38 *Auckland Council Draft Future Development Strategy 2023 – Impact on the Provision for Business Report to Fletcher Building* (Tattico Limited, July 2023) at 25.

7.3 This would place additional pressure on the northern transport corridor because residents will need to commute south for work. 47% of the Hibiscus catchment currently leaves the local economy for employment. This indicates that there is a significant industrial employment base within the localised market; but not enough industrial activity and employment opportunities locally to satisfy this demand.

7.4 The Silverdale Private Plan Change area could potentially accommodate 2,000 industrial employees, which would reduce the need to travel further distances, likely by car. Silverdale West has major advantages in terms of its location adjoining the existing industrial land within Silverdale, its proximity to the Silverdale transport interchange, and its location adjacent to the motorway interchange for freight movement.

7.5 The proposal to defer live zoning of Silverdale West is (like other areas) based upon a perception that there is insufficient infrastructure available to support the development. However, this ignores the extensive work that has been undertaken by FDL and FHLD (in consultation with the Council) regarding servicing of the site. Much of the bulk sewerage and water networks to service the Silverdale West area have already been constructed by FHLD. Further water infrastructure is being installed as part of the Highgate Bridge project currently underway.

7.6 In terms of other infrastructure required, the position is as follows:

(a) Only minor transport infrastructure upgrades are required to enable Stage 1 of the development, comprising 100 hectares of industrial land. The collaborating landowners will fund the necessary transport upgrades to ensure that the existing network can accommodate the additional traffic.

(b) The collaborating landowners will also fund the provision of water and wastewater infrastructure to the site.

(c) All flood risk and stormwater can be managed on the site so there is no impact either upstream or downstream.

7.7 The effect of this is that the collaborating landowners have proposed an alternative infrastructure funding mechanism to enable 89 hectares of industrial land to be live zoned. This would deliver significant employment opportunities, which, at typical employment ratios, would generate 2,000 jobs.

7.8 At the very minimum, the Draft FDS should signal that the Silverdale West Structure Plan is complete and Stage 1 of the development is to be rezoned ready for development. It could identify the infrastructure constraints the Council is facing and set a commitment to work with the private sector to find innovative infrastructure solutions for early release of the land.

7.9 Instead, the Draft FDS fails to acknowledge that such a solution is feasible and to the contrary, defers rezoning to 2030+, while aiming to put in place barriers to private plan changes that would prevent this kind of solution from being enabled.

8. PROPOSED IMPLEMENTATION MEASURES

8.1 The Draft FDS records an intention to implement changes to the AUP to require stricter compliance with the Council's growth strategy. Specifically, the Draft FDS proposes the initiation of a change to the RPS to:

(a) Amend the RPS to more directly require compliance with the FDS; and

(b) Make the Rural Urban Boundary ("RUB") a regional plan rule such that it cannot be amended by way of a private plan change request.

8.2 These changes appear to be motivated by a perception that private plan changes approved "out of sequence" with the FULSS have undermined the Council's ability to provide for integration of urban growth and infrastructure funding and delivery and should therefore be curtailed.

Requiring compliance with the FDS

8.3 Auckland's experience of the FULSS demonstrates that it is impossible for the Council to unilaterally control where growth occurs. Land release and development has not rolled out in accordance with the identified schedule, because it is a blunt tool that does not take into account land ownership patterns, market demand and other factors which determine how development occurs. Some flexibility is required to accommodate those factors. In this regard, the IHP on the AUP expressly decided to remove reference to a land release programme in the RPS. It said:[39]

> *"This is because the land release programme is currently not complete and therefore not available for review, there will be little public and stakeholder input as the process under which the land release programme is being prepared sits outside of the Resource Management Act 1991 and the programme represents a return to "failed growth policies of the past" and could be used as a means by the Council for constraining growth in the Future Urban Zone."*

All of those considerations continue to apply.

8.4 Since the FULSS was promulgated, the Council has only advanced one public plan change (at Whenuapai) to give effect to the land release strategy identified. This was subsequently withdrawn. The Council has therefore resoundingly failed to advance public plan changes to release land in accordance with its own policies under the AUP and FULSS. It has relied on the private sector to do this.

8.5 Private plan changes approved have almost all been within the areas identified in the FULSS as targeted for growth and zoned FUZ by the Council through the AUP. They have typically only been inconsistent with the FULSS in terms of timing.

8.6 Any private plan change must be the subject of a rigorous Schedule 1 process under the Resource Management Act 1991 ("RMA") in which the appropriateness of the proposed zoning and the ability of the land to be serviced is thoroughly tested. Decisions on private plan changes are made by experienced Independent Commissioners appointed by the Council. Therefore, all private plan changes that have been approved have been demonstrated to give effect to the relevant statutory and planning documents and to achieve the purpose of the RMA.

Making the RUB a regional rule

8.7 The Urban Growth provisions of the RPS and the question of whether the RUB should be a regional or district rule were robustly and comprehensively debated at the AUP hearings.

8.8 The IHP considered in detail the extent to which the AUP should lock in land supply and infrastructure decisions, concluding that such a step would not be consistent with the sustainable management purpose of the RMA. It said:[40]

> *"While the desire of the Council to achieve planning certainty about growth over the next 30 years is understandable, the Panel does not*

39 *Report to Auckland Council Hearing topic 013 Urban growth* (Auckland Unitary Plan Independent Hearings Panel, July 2016) at 8.

40 *Report to Auckland Council Overview of recommendations on the proposed Auckland Unitary Plan* (Auckland Unitary Plan Independent Hearings Panel, July 2016) at 67.

> *consider that it promotes the purpose of sustainable management to lock in land supply and infrastructure decisions over such a long period when the environment and the needs of people are constantly changing. Resource management planning needs to be responsive to the dynamic processes of urban growth. While providing certainty can promote efficiency by reducing future process requirements, overly or unnecessarily rigid application of rules can be a hurdle or barrier to efficiency by creating additional costs."*
>
> *[emphasis added]*

8.9 The IHP heard extensive economic evidence that excessively strict controls in respect of urban growth would likely have the effect of driving up prices, suppressing development and severely adversely affecting housing affordability. The IHP said:[41]

> *"The Panel considers that methods aimed at sustainably providing for housing in an efficient manner should be designed to discourage undesirable behaviours, such as land banking, and encourage desirable outcomes, such as creating alternative and competitive development opportunities to meet the needs of people. A Rural Urban Boundary that is permanent for the next 30 years, subject only to the unilateral power of the Council (or a Minister) to move it, would not provide sufficient planning flexibility to adapt to changing circumstances.*
>
> *For these reasons the Panel recommends that the Rural Urban Boundary should remain as a method in the Unitary Plan but should be moved from the regional policy statement to the district plan. While the policy for its location should remain in the regional policy statement to maintain its strategic direction over a longer term, the location of the boundary itself should be able to be changed by a plan change at the district plan level, which can be the subject of an application by any person."*

8.10 The proposal in the Draft FDS essentially represents another attempt to lock in the RUB, notwithstanding the incontrovertible findings of the IHP that such changes to the planning framework would have significant adverse effects on land values and would be inconsistent with the scheme of the RMA.

8.11 In the present case, no evidence has been provided to suggest that the IHP's concerns about severe adverse effects on affordability would not eventuate if the Draft FDS is approved.

9. CONSULTATION PROCESS

9.1 The Draft FDS is an extremely important document which will have major implications for Auckland's future growth and wellbeing. The consultation process adopted by the Council has not reflected that importance, and FDL is concerned that when making decisions on the Draft FDS, the Council will not be properly informed of the issues.

Timing

9.2 Section 83 of the Local Government Act 2002 ("LGA 02") requires that when using the special consultative procedure, a local authority must invite views on the proposal "for a period of not less than one month." The consultation period originally provided on the Draft FDS, of one month exactly, represented the bare minimum in terms of the legislative requirements.

41 *Report to Auckland Council Overview of recommendations on the proposed Auckland Unitary Plan* (Auckland Unitary Plan Independent Hearings Panel, July 2016) at 67.

9.3 The extension of an additional month was obviously welcomed, but even so, is insufficient to enable a comprehensive response to be provided, particularly because there has previously been no consultation between the Council and developers in the preparation of the Draft FDS, resulting in a significant divergence in terms of understanding of the issue.

No reasonable opportunity to present views

9.4 Importantly, the Council has not provided a reasonable opportunity for submitters to present their views in a manner that is appropriate to the preferences and needs of the submitter, as required by section 82(1)(d) of the LGA 02.

9.5 The Have Your Say events are wholly inadequate to provide submitters with a reasonable opportunity to present their views in accordance with section 83(1)(d) of the LGA 02, having regard to the extensive and complex issues requiring consideration. It is impossible to convey these issues by way of a public "drop in" event.

9.6 FDL took up the opportunity to present to the Planning Environment and Parks Committee on 21 July 2023. Despite the large number of major developers and other interested parties in attendance, FDL was disappointed to see that only six Councillors were present at the meeting. The meeting was an important opportunity for the Committee to understand direct from developers the key issues which have been ignored or misrepresented in the Draft FDS. It is unfortunate that so many Councillors elected not to attend.

Views to be received with an open mind

9.7 FDL has received advice that the Council may be aiming to adopt the FDS in September 2023. If correct, this timeframe leaves no scope for proper consideration of submissions and the undertaking of any necessary further analysis. It also suggests that the Council is not approaching this process with an open mind, but is instead committed to approving the Draft FDS notwithstanding the major flaws identified by submitters.

10. CONCLUSION AND REQUESTS

10.1 Having regard to the above, FDL requests that the Council pauses the current programme on the Draft FDS and initiates meaningful consultation with the community, including the residential development sector, as required by Clause 3.13 of the NPS-UD.

10.2 Future work on a revised FDS should be underpinned by the following principles:

(a) Sufficient land must be released at the appropriate time to cater for growth, continuing the combination of urban consolidation, greenfield development, and the expansion of satellite townships;

(b) Land should be released at the time needed to meet the community's needs, taking into account the long timeframes to work through the Council's regulatory processes to deliver occupiable homes;

(c) Opportunities for and staging of growth needs to be considered on an area by area basis, rather than applying blanket rules across the region;

(d) The private sector should be enabled to deliver quality urban growth;

(e) Growth needs to be serviced by adequate infrastructure, which can be supplied through a broad range of options including innovative methods and participation by the private sector (investment and development);

(f) Stormwater and flood plain management are important factors and need to be considered in the release of land, but there are various methods to manage such issues; and

(g) There should be sufficient flexibility to enable departure from the future development strategy in site specific circumstances, to be responsive to new information, site specific analysis and market need. As such, the RPS does not need to be amended to preclude private plan changes which are inconsistent with the future development strategy and the RUB does not need to be a regional rule.

10.3 In respect of Silverdale West, FDL requests that:

(a) That the Draft FDS process be paused and meaningful engagement held with FDL and its development partner, FHLD, in relation to Silverdale West;

(b) That the Council receive and process its pending private plan change application for Silverdale West based on current operative policies without deferment or delay and without giving consideration to future, and unadopted, provisions of the Draft FDS; and

(c) As a bare minimum, any new iteration of the Draft FDS, or amendment to the Draft FDS, should:

(i) Identify Silverdale West as a committed growth area; and

(ii) Show Stage 1 of Silverdale West as development ready in the 2023-2030 time period.

DATED at Auckland this 31 day of July 2023

Yours sincerely

[redacted]

[redacted]

[redacted]

[redacted]

Contact person: [redacted]

ATTACHMENT A

ANALYSIS OF THE AUCKLAND COUNCIL DRAFT FUTURE DEVELOPMENT STRATEGY 2023: IMPACT ON THE PROVISION OF LAND FOR BUSINESS REPORT TO FLETCHER BUILDING

27 JULY 2023

TATTICO LIMITED

#8130

tattico

Analysis of the Auckland Council Draft Future Development Strategy 2023

Impact on the Provision of Land for Business

Report to Fletcher Building

27 July 2023

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1 EXECUTIVE SUMMARY

1.1 This report has been prepared in support of a submission by Fletcher Development Limited (Fletcher) on the Auckland Council draft Future Development Strategy (draft FDS).

1.2 This report focuses on the impact of the draft FDS on the future supply of business land to enable Auckland to meet its economic development needs. This analysis focuses on industrial land (as opposed to retail centres).

1.3 Fletcher is a major provider of both industrial development land as well as the development of industrial premises for the many businesses within Fletcher Building that are involved in the manufacturing and distribution sector.

1.4 This planning analysis forms part of a broader assessment by Fletcher of the economic, traffic, and operational requirements for the full and successful provision of industrial land to underpin Auckland's economic growth, and how this should be reflected in a replacement FDS.

1.5 The conclusions of this analysis are that:

(a) The focus on intensification across existing urban areas in the draft FDS fails to take adequate account of the diverse needs of business land users. Such as land size (ranging from <100m^2 premises to large multi-hectare footprint buildings), proximity to employees in residential growth areas and nor does it consider the impact of the size and frequency of vehicle movements that business land use can generate. Providing sufficient development ready industrial land, that addresses the broad range of requirements, is essential to enable businesses to meet the service, production, and distribution needs of the Auckland community. In turn, stimulating economic development and generating employment opportunities.

(b) While the draft FDS acknowledges the need for business land in future urban areas "particularly in the north, north-west and south", the proposed new timing for release of business land in these areas is significantly deferred from the current Council proposed timing (in many cases in excess of 10 years). This will constrain economic opportunity in locations already experiencing growth in residential development and will compound the need for people to travel extended distances to work.

(c) Constraining land supply through reduction of business land area and deferring its release, will escalate land price, and add to land affordability problems, which will also impact affordability of residential land.

(d) The draft FDS inappropriately relies solely on urban consolidation to provide all new business land through until 2030/35. The historically low industrial vacancy rates across the existing urban areas of Auckland demonstrate there are limited new additional growth opportunities for industrial land. This is particularly acute for business activities that have real or perceived impact on adjacent land users, such as manufacturing activities typically undertaken in heavy industrial zone areas.

(e) Since the Unitary Plan became operative, Council has relied on the private sector to advance plan changes to live zone Future Urban zoned land. There have been no public plan changes completed by Council (PC5 in Whenuapai was promoted but subsequently withdrawn). All major rezonings have relied on the private sector. The draft FDS removes the ability for private plan changes and so there is a real risk that Council would not even meet the deferred proposed timing for release of land.

(f) It is accepted that Council has financial constraints, which are negatively impacting infrastructure provision. However, rather than restrict greenfield development for a decade, as the draft FDS is proposing to do in certain areas, Council should look for alternative and innovative ways to fund infrastructure. Such as working with the private sector to bring its experience and resources to help solve infrastructure problems on an area-by-area basis. This approach has been demonstrated to work across several areas of Auckland and has led to sustainable growth. Revoking the pathway for private plan changes, will not yield the desired outcomes that Council is trying to achieve and will instead hinder economic and employment growth in the region.

(g) A more effective way to solve infrastructure issues is through partnership with the development community, which calls into question why the development sector was not consulted on the draft FDS, as required by clause 3.15 of the NPS-UD. A more agile, rather than restrictive strategy, is called for.

(h) The Silverdale Wainui area was identified by the AUP and FULSS as a key growth area for Auckland. The FULSS also identified a need for additional employment land in the north (Silverdale West) to create job opportunities for nearby growing residential areas. Under current Council timing, Silverdale West was supposed to be development ready by 2018-22. However,

Council have failed to progress live zoning the land to industrial due to infrastructure constraints and have proposed in the draft FDS to defer this to 2030+. The Silverdale West area is an example where collaborating private developers (FDL and Fulton Hogan) are able fund the required infrastructure upgrades, in particular traffic, to unlock the first Stage of industrial land.

(i) The draft FDS promotes a set of "principles for growth and change" with a heavy environmental focus and disproportionately less weight given to growth capacity, particularly for business. "Future business land provision" is relegated to a secondary set of factors considered as part of the draft FDS.

(j) This understating of the importance of business development runs contrary to section 5 of the Resource Management Act 1991 (RMA) which, in association with the rest of Part 2 of the RMA, seeks the mechanisms to create the balance between cultural, environmental, social and economic outcomes essential to a sustainable community.

(k) Reinforcing this is the National Policy Statement on Urban Development (NPS-UD) which requires Council to provide a minimum of 30 years' growth for business land, and to complete a robust "Housing and Business Development Capacity Assessment" (HBA).

(l) The draft FDS has not followed a HBA as required by the NPS-UD. Had that analysis been undertaken, it would inevitably have identified the critical shortage of prime industrial land and the need to provide full provision of land to support economic growth and employment opportunities.

(m) Since 2011, the Council have been promoting a balanced growth strategy for Auckland, targeting employment/business land supply through both urban consolidation and targeted greenfield expansion. This has been consistently reinforced through the Auckland Plan, Auckland Unitary Plan, Future Urban Land Supply Strategy (FULSS) and various structure plans. The draft FDS does not present a balanced growth strategy for business land.

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

- Further constraining industrial land supply, which already show very low vacancy rates (1%) of prime industrial properties across Auckland.
- Reducing the opportunity for local employment in new residential growth areas

- Restricting manufacturing capabilities within the region, as well as the required growth within the service and distribution sectors.
- Further exacerbating congestion issues in Auckland by focusing employment in existing urban areas and not close to new residential areas.
- Significantly and negatively impacting industrial land affordability through land supply constraint, leading to more businesses relocating outside of Auckland.
- Having a demonstrable negative impact on the economic development of Auckland and the development sector.

1.6 The conclusion of this analysis is that the final FDS needs to provide a significantly increased focus on and provision for business land, and the direct economic and employment benefits this brings. To this end, this report recommends:

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

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

(c) some key principles be agreed including:

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

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

(iii) growth, including business land, needs to be serviced by adequate infrastructure;

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

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

(vi) apply those principles on an area-by-area basis to identify the release of land.

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

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

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

(g) That any new iteration of the FDS include the Silverdale West area as a committed growth area;

(h) That Silverdale West be shown as development ready in the 2023-2030 time period.

2 FLETCHER SPECIFIC INTEREST

2.1 Fletcher Building has a dedicated industrial development team, Fletcher Development Limited (FDL). FDL acquires and develops industrial land that support Fletcher Building property requirements (supporting 20+ businesses) or is developed and sold to other purchasers. FDL delivers significant capital investment projects within key growth areas in the Auckland region where industrial development is well supported by infrastructure, market demand and employment.

2.2 The draft FDS has a significant impact on the ability of Fletcher to acquire and deliver development ready land and to construct the industrial assets essential to the Auckland economy.

2.3 This submission is related to the whole Auckland region and the identified greenfield development areas currently zoned Future Urban.

2.4 In addition, Fletcher has particular land holdings in the Silverdale West area and is heavily involved in a collaborative approach with Fulton Hogan on the development of this proposed industrial land. This submission uses Silverdale West as an example of the impact of the draft FDS. However, this is only one part, albeit an important part, of this Fletcher submission.

3 BUSINESS LAND

3.1 The draft FDS, in analysing business areas, summarises current issues and trends. This work generally accords with the understanding by Fletcher advisers. It identifies issues including:

- "*Heavy and light industrial uses are moving out towards the periphery because existing industrial land is highly constrained for expansion."* (Consultation Draft section 4.2.4)
- "*The quality compact approach to accommodating future business growth is to make the best use of existing business land, as well as create new business land in greenfield areas.*" (Consultation Draft section 4.2.4)
- "*Business land for land extensive industries has specific requirements for large, flat sites with good accessibility. A number of such sites have been identified in future urban areas and need to be protected for that purpose."* (Consultation Draft section 4.2.4)
- "*Approximately 1,400ha of business land is needed in greenfield areas … indicative business land was also identified to serve the north, north-west and southern future urban areas, the focus was on defined sites for land extensive businesses particularly in Silverdale, Whenuapai and Drury Opaheke."* (consultation draft section 4.2.4 Business Areas)

3.2 The economic analysis commissioned by FDL would suggest that the requirement for additional greenfield land is understated, and the lack of an HBA as required under the NPS-UD, has not enabled the draft FDS to appropriately address this. It is difficult to determine whether the 1,400 ha shortfall of land is an accurate figure. Regardless, there is a big disconnect between the policy approach of trying to create more additional greenfield land in these locations, and the slowing down across the board of all Future Urban zoned land.

3.3 The draft FDS and associated reports identify opportunities for more efficient use of industrial land. This is supported in principle, but will only deliver limited opportunity for modern industrial premises. Reliance on this to manage land release needs to be carefully addressed. There are two main issues.

(a) Firstly infilling of industrial areas particularly for production and distribution, only works where the land size shape and contour are fit for purpose. This is often a significant constraint to infill industrial premises.

(b) Secondly, modern distribution centres do use height of buildings to achieve efficiency; however; vertical multi floored industrial facilities are not proven in New Zealand and is simply uneconomic and not practical.

3.4 The growth models that have been used by Council to support the draft FDS assume that there will be infill opportunity and GFA available above ground floor level i.e. multi levelled industrial buildings. Setting land release must be based on realistic land requirements, and proven technologies and business trends in Auckland.

3.5 This analysis focuses on industrial business land, and the essential role tis plays in fostering economic development and employment. It does not comment on the retail, or office sector.

3.6 While a generalisation, industrial business land can be broadly characterised as economic activity targeted at:

- service;
- production (which in this report includes manufacturing) ; or
- distribution sectors.

3.7 Each of the above have different land requirements.

3.8 The service sector is typically embedded across the region in different suburbs. Firms vary from those needing small sites to medium sized properties. They provide local services to local communities.

3.9 The production sector typically requires a broader range of small through to large sites. Access to employment and good transport linkages are essential. On large sites, contour is critical.

3.10 The distribution sector is growing in importance. This invariably needs large sites of flat contour with good transport connections. Freight costs are an essential element in location considerations and are driven by the location of their market.

3.11 Much of the industrial parts of Auckland developed in the 1950s, 60s and 70s is characterised by smaller sites with a fragmented subdivision pattern. Some of these are on a moderate contour. They have traditionally focused on the servicing sector and still provide significant and useful opportunity for that function.

3.12 The production and distribution sectors require larger sites where contour is critical.

3.13 Particularly through the late 70s and to the current time, there has been a significant rollout and uptake of land for the distribution sector.

3.14 There is growing demand for suitable land for the distribution sector with increasingly sophisticated automation and larger facilities. Here, large flat vacant land is required. Major industrial estates have been created and land released. It is essential that Auckland's supply of business land keeps pace with economic growth and industry standards. Furthermore, land supply needs to meet the required site and location characteristics, in terms of access to transport, contour and lot size. This is a significantly higher constraint than residential land where there is far greater flexibility to accommodate and work with size, shape and contour of land.

3.15 The final FDS needs to enable this economic activity. For reasons set out below, the draft FDS does not meet that objective.

4 INSUFFICIENT SUPPLY OF INDUSTRIAL LAND

4.1 The draft FDS promotes a significant urban consolidation model through until at least 2030 with no greenfield expansion.

4.2 The key areas identified for growth are essentially:

- Westgate / Whenuapai;
- City centre;
- Mt Roskill
- Tamaki;
- Mangere;
- Drury.

4.3 The only structure plan that specifically targeted industry is Silverdale West. This is a critical location to support local employment and economic activity in the north A dedicated structure plan is appropriate and beneficial. However even this key business rezoning is not in the identified growth areas over the next 10 years.

4.4 The other identified growth areas through to 2030+ provide for industrial land within the general area. In this regard:

(a) **Westgate / Whenuapai**: The Whenuapai Westgate area has vacant live zoned industrial land and a significant area of FUZ zone targeted for industrial development. Parts of these are identified in the draft FDS as a priority for years 1 to 10. The rest is in priority 11-30. Fletcher supports the priority for the release of this land as an essential part of providing economic activity and local employment in the Whenuapai Westgate area. On the face of it, the spatial priority area does have an element of contradiction over the timing of release of part of the Whenuapai land in that it is shown as both a priority for investment in years 1-10 and a priority for investment in years 11-30.

(b) **City Centre:** The city centre, with new business development aligned with the CRL stations, does not provide practical sites fit for purpose land for the productive or distribution sectors. It will promote business, but it is more in the commercial, office, retail and some servicing component.

(c) **Mt Roskill:** The Mt Roskill corridor does provide limited opportunity for industrial development. The industrial areas are largely developed, with the exception of the current redevelopment of the Roma Road area. On completion, that would exhaust the large vacant industrial land in this location.

(d) **Tāmaki:** The Tāmaki industrial land is essentially developed apart from a recreational facility.

The amount of industrial land apparent in this area is somewhat distorted firstly because of the eastern highway designation and a significant portion of this being zoned Light Industry. It is also distorted by the Mixed Use zoning which is almost invariably being redeveloped for housing. Redevelopment of sites will obviously contribute to employment, but this area offers minimal industrial land suitable for new expanded productive and distribution functions.

(e) **Mangere:** The Mangere growth node does not provide for a significant expansion of industrial land.

There is, however; vacant industrial land adjacent to the airport. Furthermore, the long-term strategy identifies additional land at Puhinui but this is not envisaged until post-2035.

There is some opportunity for expansion of industrial land at the airport precinct but this is constrained by transport access. The major redevelopment of the Puhinui industrial estate is capped by tight vehicle movement constraints.

(f) **Drury:** Drury does provide vacant land for light industrial development.

4.5 The only two locations with good forward land development opportunity are Westgate Whenuapai, in the north-west, and Drury, in the south. There is some opportunity around the airport.

4.6 Development opportunity in the north is particularly constrained because the draft FDS has delayed land development in Silverdale West out beyond 2030

4.7 There are limited infill opportunities across the region, however the FDS should:

- Provide for 30 years growth as required by the NPS:UD
- Include or be informed by a HBA and at all times provide more than sufficient industrial land capacity, so as not to distort market prices;
- Create opportunities across the region, not just focused in one or two locations. In this regard, the lack of business development land in the north is clear;
- Enable high-quality sites that meet the needs of industry, both the productive and distribution sectors,

The current FDS does not set out a strategy to achieve this.

4.8 The Council has produced five structure plans since the FULSS was prepared.

- Of these, only one (Silverdale West) is solely focused on providing industrial employment land;
- The remaining four provide for some material level of industrial land release;
- The one specific industrial structure plan (Silverdale West), which Council resolutions show was to be prepared and released prior to now, is to be deferred until 2030+ under the draft FDS;
- Of the other four structure plans providing for industrial activity;
    - the Warkworth Structure Plan is proposed to be deferred from 2018/2022 to 2040+;
    - the Drury Structure Plan is proposed to be deferred from 2028 to 2035 although a large block of industrial land has been recently rezoned.;
    - the Pukekohe Structure Plan is proposed to be deferred from 2023 to 2035+ and 2040+;
    - the Whenuapai Structure Plan is targeted in part for the next 10 years and in part 11-30 years (FUZ zoned land).

4.9 In each case, the reason for deferral related to matters of infrastructure (including transport) or stormwater management. None are deferred because of an assertion of a surplus of land or changed requirements for business.

5 FDS PRINCIPLES FOR GROWTH AND CHANGE

5.1 The draft FDS sets out the key principles which have led to the strategy.

5.2 Section 2.5 "*Principles for growth and change*" identifies the "*universal ways of accommodating growth, applicable Tāmaki Makaurau-wide, no matter what scale or spatial environment is considered".* These principles are:

- *Support greenhouse gas emission reduction*
- *Adapt to impacts of climate change*
- *Make efficient and equitable infrastructure investments*
- *Protect and restore the natural environment*
- *Enable sufficient capacity for growth in the right place at the right time*

5.3 While the Council constraints on infrastructure are recognised, the key principle for growth related infrastructure should be to invest in the provision of infrastructure to meet the social and economic needs of Auckland. It is about infrastructure being an enabler of economic development and community development, rather than constraining growth due to infrastructure. There needs to be a balance. What that balance is needs to be worked through. However, the key principles of the FDS should start from the premise of infrastructure as an enabler of economic development.

Council's approach to reviewing future urban areas

5.4 The Council's approach to reviewing future urban areas is set out Appendix 7 to the draft FDS. The scope of the review covered all future urban areas that had not been live zoned as of 2023, with the intention being to evaluate the appropriateness of areas for future growth. Consideration was given to new strategic and policy direction, new and updated data, changes to enabled development capacity.

5.5 The following key criteria were used:

- Exposure to natural hazards
- Modelled contributions to increased CO_2 emissions/vehicle kilometres travelled (VKT)
- Infrastructure timing and delays

5.6 *"Other factors"* considered were:

- High-level, indicative bulk infrastructure costs
- Committed council infrastructure

- Urban form and future business land provision
- Potential to provide key locations for future managed retreat of nearby vulnerable existing urban areas
- Presence of known sites of significance to mana whenua, Māori freehold land, commercial and cultural redress, and cultural and statutory acknowledgement areas
- Loss of highly productive land
- Impacts on the natural environment, including indigenous biodiversity and water quality.

5.7 Adequacy of supply of business land is considered an "*other factor*". This does not reflect the priority the NPS:UD requires Council to give to 30 years minimum of "future business land provision"

5.8 The draft FDS defers the timing of when many future urban areas will be "development ready" and able to accommodate growth. Often this delay is due to funding issues with additional infrastructure related to growth.

5.9 There is an underlying theme in the draft FDS of constraining and slowing down business land release, and the economic development and social benefits this brings, because of infrastructure constraints. While it is accepted the FDS must be tempered by the current financial position the Council is in, for reasons set out below, if the issue is *how infrastructure is funded* so as to be an enabler of growth rather than a constraint on growth, then the FDS should be open to different and innovative ways of addressing the issue. This rather than the presumption of an unresolvable budget problem leading to a necessity to defer land release and constrain development.

6 REQUIREMENTS FOR A PLANNED SUPPLY OF LAND TO MANAGE GROWTH

6.1 The National Policy Statement on Urban Development (NPSUD) sets a legislative requirement to have a planned 30-year growth for Auckland. This is for both residential growth and business growth.

6.2 The NPSUD requires tier 1, 2 and 3 local authorities (Auckland being tier 1) to "*at all times provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term and long term.*"

6.3 The strategy is targeted at both "*existing and future urban areas*" and sets a requirement to provide growth for at least 30 years.

6.4 The business growth is required to provide "*business land from different sectors*".

6.5 In a recent Environment Court decision (*Middle Hill Limited v Auckland Council* 2022), the Court stated:

> *"The NPS-UD has the broad objective of ensuring that New Zealand's towns and cities are well functioning urban environments that meet the changing needs of New Zealand's diverse communities. Its emphasis is to direct local authorities to enable greater land supply and ensure that planning is responsive to changes in demand while seeking to ensure that new development capacity enabled by council is of a form and in locations that meet the diverse needs of communities and encourage well-functioning, liveable, urban environments. It also requires councils to remove overly restrictive rules that affect urban development outcomes in New Zealand's cities."*

6.6 The Auckland Plan, Auckland Unitary Plan and Future Urban Land Supply Strategy are set out to create a balanced strategy that will achieve this requirement.

6.7 The draft FDS significantly slows down the release of business land in the medium and long term through deferring the live zoning of Future Urban zoned land. This will only lead to a shortage of land supply which in turn will escalate land price and demand for existing industrial premises.

6.8 The Auckland Transitional Act required the development of the Auckland Plan. This in turn set a 30-year horizon to, among other things, manage growth. This promoted a combination of existing development areas plus greenfield expansion.

6.9 The first iteration of this work was the AUP which provided for a level of appropriate development, both live zoned and zoned for future urban development.

6.10 This was then complemented by the FULSS of 2017 which informed the direction and location of growth, particularly for the future urban areas identified within the AUP.

6.11 The key issue with the FULSS has been the implementation of this strategy.

6.12 The long-established development scenario set effectively in 2011 has been:

- a 'spatial plan' that provides a 30-year strategy for the development of Auckland and its communities that integrates social, economic, environmental and cultural objectives (the Auckland Plan) - completed;
- identification of a resource management strategy which among other things identified areas of future urban zoned land (the AUP) - completed;
- identification of key growth areas to be live zoned over time (the FULSS) – completed.
- development of a structure plan for key growth areas – 5 structure plans have been completed, with no other ones currently proposed;
- implementation of the necessary plan changes to give effect to these developments - only one public plan change advanced, even that was withdrawn by Council. 18 private plan changes have been advanced.

6.13 What this shows is that:

(i) Since 2011, there has been a long-established strategic policy direction on the growth for Auckland based on urban consolidation and some greenfield expansion.

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

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

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

(v) Council has failed to deliver a single private plan change.

(vi) This has delivered additional growth for Auckland.

(vii) To the best of Fletcher's knowledge, none of these developed private plan change areas experienced any issues with the early 2023 extreme flooding events or geotechnical problems. The design and planning system worked and what has been delivered is working.

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

6.14 With some minor changes, this could simply be adopted for the next Long Term Plan (LTP) rather than pushing through an FDS based on incomplete information. The FDS is such a critical development tool and has a huge implication on:

- land supply,
- economic development,
- industrial land and the economic viability of the development sector,

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

7 UNDERSTANDING THE TIMEFRAMES TO GET LAND DEVELOPMENT READY

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

7.2 The process typically includes:

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

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

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

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

(e) The actual design, construction and commissioning of business premises (manufacturing plants, service and distribution facilities) can be a further 18-months to 2-year process.

7.3 These are realistic, if slightly optimistic, timeframes. Very few projects would hit good timeframes at every stage.

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

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

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

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

8 SUPPORT FOR THE CONCEPT OF A FUTURE DEVELOPMENT STRATEGY (FDS)

8.1 This analysis supports the concept of having a Future Development Strategy; but does not support the published draft approach.

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

8.3 The 2017 Future Urban Land Supply Strategy (FULSS) has worked reasonably well in informing and directing the location of growth, albeit that the strategy has not been responsive enough to keep up with the pace of growth. The timing of development ready land has invariably been slower than that set out in the FULSS. Furthermore the timing that has been achieved in all cases has relied on private plan changes.

8.4 An update of the FULSS through the FDS is a sound objective and is supported. Six years on, the FULSS does need an update. However, this needs to be a planned, considered, comprehensive upgrade; rather than a rushed reaction to a series of events.

8.5 It is accepted that there are financial infrastructure constraints facing Auckland, and therefore the direction and pace of growth needs to be clearly signalled by the Council to assist in the logical and sequential development of appropriate parts of the urban area of Auckland.

8.6 The FDS is the right thing to do; but the strategy embodied within the draft FDS is not.

9 A BETTER WAY TO SOLVE INFRASTRUCTURE

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

9.2 The critical issue in this draft FDS is that the need for business land and housing land cannot be paused until the Council's financial position rectifies itself.

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

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

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

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

9.7 The Council needs to explore options including:

(i) private sector funding of key infrastructure to enable at least early stages of growth. Private funding will often benefit the wider area and provide employment opportunities sooner than Council can or are able to. (Silverdale West is a strong example of where this can and should happen);

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

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

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

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

10 SILVERDALE WEST CASE STUDY

10.1 Silverdale West provides a useful case study for the impact of the draft FDS and the ability to explore alternate ways to achieve critically important economic development opportunity and employment in the north.

10.2 The context is that:

(a) The Auckland Plan, AUP and FULSS identified the Silverdale-Wainui area as a key growth area for Auckland.

(b) Significant upzoning in the area for housing has been facilitated through the AUP and subsequent plan changes.

(c) The FULSS identified the need to provide additional industrial employment land in the north so as to create a reasonable proportion of job opportunities within the Silverdale-Wainui community. The land was to be development ready in the 2018-2022 time period.

(d) In late 2017, Auckland Council commenced work on the Silverdale West Structure Plan. This Structure Plan was entirely focused on industrial development (as opposed to residential).

(e) The Structure Plan identified the staged release of industrial land.

(f) The Structure Plan was finally adopted in April 2020, almost 2.5 years after notification.

(g) In 2020, the Council resolved to move to live zone the area for industry. This was seen as critical in terms of economic development, the social drivers relating to employment, and transport in terms of creating more jobs in the north reducing the need for commuting south to Albany and the city centre.

(h) Major companies active in industrial land development purchased into the area and consolidated land holdings reliant on the Council's commitment.

(i) Through COVID, the Council signalled budgetary constraints had impacted the timing of the Council plan change to undertake the necessary live zoning.

(j) Two primary landowners in Silverdale West Stage 1, FDL and Fulton Hogan, set up a collaborative approach to work with the Council to advance a private plan change. This plan change is intended to give effect to the Council's adopted Structure Plan. The private plan change does not seek to change zoning or intensity. It simply facilitates the Structure Plan as would have the Council through a public plan change, if they had the resource.

10.3 The draft FDS has taken land which should be released before now to create jobs for the significant growth in housing in the Silverdale Wainui area, and deferred this to 2030+. This places additional pressure on the northern transport corridor as instead of more jobs in the area, residents need to commute south for work. The strategy to zone and develop a significant area of industrial land to enhance employment opportunities in the north concurrent with residential development, remains the right approach. The delay is due to funding infrastructure. Better to meet the community, social and economic objectives by finding innovative ways to fund infrastructure.

10.4 Forty seven percent of the Hibiscus catchment leave the local economy for employment, indicating there is a significant industrial employment base within the localised market; but not enough industrial activity and employment opportunities locally to satisfy this demand. The Silverdale Private Plan Change area could potentially accommodate 2,000 industrial employees which would reduce the need to travel further distances, and likely by car.

10.5 The private plan change request negotiations clearly identified the constraints the Council was working under. Consequently, the two collaborating landowners set out to find a way to work with Council and find ways to resolve infrastructure for at least the first stages of development. In this regard the Fletcher / Fulton Hogan work commitment has identified:

(i) Stage 1 of the development can be released with over 100ha of industrial land. This will require infrastructure upgrades, but it does not trigger the major Silverdale motorway interchange upgrade.

(ii) The collaborating landowners will fund the necessary transport upgrades such that the existing network will manage the generated traffic.

(iii) The collaborating landowners will fund and deliver water and wastewater services to the site.

(iv) The private plan change will be carefully designed so as to manage all flood prone areas, overland flow and stormwater within the catchment so there is no impact either upstream or downstream.

(v) Effectively the collaborating landowners are operating an alternative mechanism to fund and resolve infrastructure to get the first stage industrial land live zoned, with the private sector solving the infrastructure funding problem. The response of the draft FDS runs contrary to this approach.

10.6 The implication of the draft FDS is that:

- only the Council can fund the necessary infrastructure;
- the Council cannot afford to fund the infrastructure;
- therefore, the area should be deferred from live zoning to some future date.

10.7 Under the draft FDS, it would appear that little weight is given to the significant benefits that release of the land has in terms of reducing the need for commuting from the north and solving other infrastructure components.

10.8 The draft FDS and the supporting documents identify the need for business land in the north and the suitability of the Silverdale West area as an appropriate location for industrial land use. Silverdale West has advantages of its collocation with the existing industrial land within Silverdale, its proximity to the Silverdale transport interchange, and its location adjacent to the motorway interchange for freight movement.

10.9 Notwithstanding the identified merits of this location and the long established commitment through the Structure Plan and Council resolutions to rezone the land to light industry by now, the draft FDS defers this rezoning until 2030 plus.

10.10 The draft FDS states that the timing is changed based on the planned delivery of infrastructure. It identifies that infrastructure as being the North Shore Rapid Transit, public transport services, and interchange upgrades.

10.11 What this rationale for deferment fails to take account of are:

(a) The detailed traffic modelling as part of the Silverdale West private plan change work has identified that a significant area of industrial land can be developed in Stage 1 with identified road upgrades, before the need for the interchange is triggered.

(b) The collaborating landowners are committing to fund these works.

(c) This rezoning will deliver significant employment opportunities, which at typical employment ratios, would generate 2,000 jobs.

(d) The Council decision to relocate the rapid transit route further west, means that the Silverdale West area would be on the periphery of the walkable catchment anyway. The existing feeder bus service from the Silverdale interchange along Dairy Flat Highway provides an existing and more convenient public transport connection.

(e) Creating employment in this location reduces VKT by offering residents in this Hibiscus Coast area the opportunity to work locally, reducing the requirement for so many to have to commute south to metropolitan Auckland.

10.12 The draft FDS should instead signal that the Silverdale West Structure Plan is complete and the first Stage of land is to be rezoned ready for development. It can identify the infrastructure constraints the Council is facing and set a commitment to work with the private sector to find innovative infrastructure solutions for early release of the land. The FDS could even indicate this is a prerequisite to the Council being able to practically service this land.

11 NATURAL HAZARDS ARE ALREADY ADEQUATELY CONTROLLED

11.1 The FDS states that delaying development of some Future Urban zoned land is in part a response to the significant weather events and flooding and stormwater issues following the January and February storm events in Auckland.

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

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

11.4 There is no urgency to advance this draft FDS for reasons of natural hazards. The existing legislative regime and AUP provisions provide all the safeguards needed.

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

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

12 MANAGING STORMWATER IN SILVERDALE WEST

12.1 Returning to the Silverdale West case study, the Silverdale West Structure Plan identifies a flood plain through the valley running through the land.

12.2 The collaborating landowners, through the private plan change request, have commissioned detailed flood modelling work in this area. That work has been updated following the January 2023 storm events.

12.3 Essentially the core flood prone area is proposed to be zoned Open Space. The open space zoning will make it clear it is not suitable or appropriate for development. It is accompanied by protection of wetlands and upgrading of stream margins. A public walkway network will be created through the area to add to the amenity of the industrial estate. This project will see the significant enhancement of the stream and its environs.

12.4 The key issue is, through sensible zoning provisions and appropriate engineering management as required under the existing AUP controls, all facets of flood risk and natural hazards can be successfully managed.

13 CHANGES TO THE RURAL URBAN BOUNDARY (RUB) SHOULD REMAIN A DISTRICT PLAN LEVEL CONTROL (AS OPPOSED TO A REGIONAL CONTROL AS PROPOSED WITHIN THE FDS)

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

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

"While the desire of the Council to achieve planning certainty about growth over the next 30 years is understandable, the Panel does not consider that it promotes the purpose of sustainable management to lock in land supply and infrastructure decisions over such a long period when the environment and the needs of people are constantly changing. Resource management planning needs to be responsive to the dynamic processes of urban growth. While providing certainty can promote efficiency by reducing future process requirements, overly or unnecessarily rigid application of rules can be a hurdle or barrier to efficiency by creating additional costs.

The Panel considers that methods aimed at sustainably providing for housing in an efficient manner should be designed to discourage undesirable behaviours, such as land banking, and encourage desirable outcomes, such as creating alternative and competitive development opportunities to meet the needs of people. A Rural Urban Boundary that is permanent for the next 30 years, subject only to the unilateral power of the Council (or a Minister) to move it, would not provide sufficient planning flexibility to adapt to changing circumstances. "

"For these reasons the Panel recommends that the Rural Urban Boundary should remain as a method in the Unitary Plan but should be moved from the regional policy statement to the district plan. While the policy for its location should remain in the regional policy statement to maintain its strategic direction over a longer term, the location of the boundary itself should be able to be changed by a plan change at the district plan level, which can be the subject of an application by any person."

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

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

13.4 The community has effectively relied on the private sector to implement the plan changes necessary to give effect to the FULSS and associated structure plans. The only public plan change that the Council promoted giving effect to the FULSS was Whenuapai. Even then, the Council ended up withdrawing that plan change. No public plan changes have been promoted that would give effect to the current growth strategy. Every greenfield development has relied on a private sector initiative and a private plan change.

13.5 Being able to deliver these critical plan changes to provide for growth, is essential. Since 2017, the Council has relied on the private sector to do this. In a time where the Council is signalling severe financial constraints, a more effective and practical approach is to work collaboratively with the private sector to facilitate a blend of public and private plan changes to implement the Council's growth strategy.

14 RECOMMENDATIONS

14.1 It is suggested the Fletcher submission seek the following next steps from the Council:

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

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

(c) some key principles be agreed including:

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

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

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

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

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

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

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

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

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

(g) that any new iteration of the FDS include the Silverdale West area as a committed growth area;

(h) that Silverdale West be shown as development ready in the 2023-2030 time period;

(i) it is recognised the Council may want to record that the live zoning is dependent on an infrastructure funding agreement between landowners and the Council over key infrastructure funding;

(j) the FDS can record that as part of any rezoning, appropriate management of flood plain and overland flow will be required to ensure development sites are not within flood plains.

#8130

ATTACHMENT B

ECONOMIC REVIEW OF AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY (FDS)

27 JULY 2023

INSIGHT ECONOMICS

INSIGHT | ECONOMICS

#8130



Final Report: 27 July 2023

Economic Review of Auckland Council's Draft Future Development Strategy (FDS)

Prepared for: **Fulton Hogan Land Development & Fletcher Building**

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1. Executive Summary

Scope & Purpose of Report

This report peer reviews Auckland Council's (**AC**'s) *Draft Future Urban Development Strategy* (**FDS**) from an economics perspective, particularly the underlying assessment of options in its *Growth Scenarios Evidence Report* (**GSER**). It focuses on the rationale for, and likely effects of, proposed major reductions in Future Urban Zone (**FUZ**) land due to alleged greenhouse gas (**GHG**) impacts.

Background

The Auckland Plan 2050's development strategy is the region's current blueprint for growth, which reflects the culmination of many years' close collaboration by all stakeholders. The FDS, however, signals a wholesale departure from this. Given the tremendous time and effort taken to forge the current approach, the evidential threshold for any proposed new strategic direction – like the FDS – is necessarily high. In our view, though, the research and analysis underpinning the FDS is materially deficient and well short of that standard. This report explains our position by describing several serious issues with the multicriteria analysis (**MCA**) of growth options underpinning the FDS.

Key Findings – Scenario Definition

The first step in an MCA is to define the options for assessment. Typically, there are three or four options, one of which is the status quo, so that any proposed changes can be readily assessed. The FDS' scenario definitions, however, are unorthodox and puzzling. First, they include an unrealistic, utopian scenario – based on a totally different set of transport and infrastructure assumptions – that forms a fictional benchmark against which the other scenarios are unduly assessed. In addition, another scenario reflects a highly dispersed urban form that also makes no sense. Consequently, two of the four scenarios are implausible and become unnecessary distractions. Moreover, no scenarios represent the status quo, which dramatically reduces the overall utility of the analysis.

Key Findings – Evaluation Criteria

The criteria used to assess options are also problematic because:

- They ignore common ground and focus only on option differences. This distorts the scale of reported option differences, while omitting key criteria because they were deemed as areas of common ground. Conversely, by including all criteria in the assessment, a full picture of option similarities *and* differences could have emerged to enable better-informed decisions.

- The criteria fixate on travel impacts despite future travel mostly being "baked in" due to the current population and existing urban form. In addition, the MCA's focus on car-based travel grossly overstates its role in GHG emissions, while ignoring the current, rapid shift towards lower emissions vehicles. At the same time, the analysis of FUZ GHG emissions is flawed because it reflects only the current situation, not each FUZ area's future state, where they are designed to operate in a largely self-sustaining manner (as per their structure plans).

- Finally, the criteria overlook the likely adverse effects of intensification, while largely ignoring key criteria in the NPS-UD, such as the need to promote competition in markets, while boosting housing choice and improving affordability.

Key Findings – Option Scoring & Weighting

We also hold grave concerns about the MCA's approach to scoring/weighting because:

- It relies intrinsically on a model whose inputs, throughputs, and outputs appear unreliable. In addition, many criteria are scored primarily by an unnamed panel of Council and CCO experts, without any real input from other key stakeholders, particularly FUZ landowners.

- 10 of the 29 criteria are assessed via very narrow and specific measures that belie the broader scope of the overarching criteria and distort likely option merits and effects.

- In addition, the scores for many criteria defy the reported outputs of the model and/or differ significantly from the preceding commentary and analysis.

- The decision not to weight criteria directly elevates the importance of some factors while systematically downplaying others. This is because, absent weights, the more criteria per theme, the greater the weight afforded it, and vice versa. And, in the MCA, one theme – travel impacts and accessibility – had 10 criteria, while other themes had only two.

Key Findings – Consideration of Capacity Sufficiency

The MCA pays little attention to the sufficiency of business and residential capacity and instead relies mainly on the theoretical, plan-enabled capacity of PC78. This seems inappropriate because:

- PC78 is on hold and, if it is later withdrawn or revised substantially, there will be major implications for capacity sufficiency, but this is not acknowledged in the FDS. Moreover, plan-enabled capacity has no real-world meaning, so relying on it here is unsound.

- PC78's capacity uplifts are inversely proportional to the density already enabled by the AUP, so it significantly boosts capacity in peripheral locations while having little impact in and around centres, where higher density is already permitted by the AUP. Thus, while PC78 enables unprecedented levels of plan-enabled capacity, much of it is poorly located.

- Capacity serviceability is not properly assessed, with the MCA merely assuming that all plan-enabled capacity is technically feasible to service. That may not be the case for (say) replacing water or wastewater trunk mains in densely populated existing urban areas, where the resulting cost and disruption may render it untenable.

- Similarly, feasibility and uptake assume a continuation of the past. However, financial feasibility has changed profoundly, and many of the best intensification opportunities have already been taken up (with remaining thus ones being more marginal overall). Consequently, the assumption that the past will simply continue is not well-founded.

- Finally, the assessment pays almost no attention to business land needs and instead simply notes that at least 1,000 hectares of business land will likely be needed in the FUZ. That aside, it largely remains silent on this critical piece of the capacity puzzle.

Key Findings – Impacts on Choice & Competition

The MCA also fails to adequately consider impacts on key NPS-UD directives, such as promoting competition in markets, and ensuring greater housing choice and improved affordability. Instead, the evaluation zooms in to fixate on other factors that supposedly contribute to "well-functioning urban environments" (**WFUE**). While that is AC's prerogative, the FDS seems to place undue weight on these other elements of WFUE while losing sight of economic factors.

The potential downzoning of large swathes of FUZ land is a particular concern because it will erode competition. Indeed, without a strong and ongoing supply of new urban land in strategically chosen locations (like the FUZ), the competitive operation of the region's urban land market will be compromised. At the same time, this FDS does not reflect the community's preferences. According to a survey conducted for PC78, "infrastructure that can cope" matters the most to Aucklanders when planning for more housing. This will be even more important now after the devastating effects of the anniversary weekend floods and Cyclone Gabrielle. Together, these events revealed major vulnerabilities in the region's three waters network and highlighted the risk of excessive intensification (i.e. creating too much impervious surface area in concentrated locations).

Key Findings – Deriving the FDS from the MCA

Lastly, the methodology used to translate the MCA into the FDS' preferred scenario is unclear. Rather than selecting the best-performing option from the MCA, as is usually done, the FDS instead creates a new, hybrid option that lacks any meaningful detail or explanation. In doing so, we consider the FDS to have erred because:

- More than half of all MCA scores (56%) were negative. According to the GSER, these negative scores "indicate the need for a specific policy intervention in addition to, or even instead of, land use or transport interventions alone." However, the FDS does not explain how it reflects or responds to the need for additional interventions to achieve its objectives.

- The FDS has not properly considered Infrastructure implications and instead deems intensification better due to allegedly lower public costs. We disagree. First, most growth-related infrastructure is funded directly by developers, and does not draw on public funds. Second, as already noted, the cost of (eventually) upgrading infrastructure networks in some existing areas could be prohibitively expensive and/or cause unacceptable disruption. Third, the "modelled" differences in infrastructure cost are much less than the MCA scores, commentary, and conclusions suggest. Accordingly, it is difficult to have any faith that the FDS has properly considered infrastructure implications when deriving its preferred scenario.

- Finally. The FDS' desire to spatially align new jobs with new homes implicitly assumes that existing urban areas work best because they let new homes reside near existing employment areas. However, this overlooks the fact that many existing employment areas are nearly fully built-out. Accordingly, new business land will still also be required in the FUZ to keep pace with residential growth and ensure appropriate balances between homes and jobs. Again, however, the FDS' proposal to slash the FUZ does not seem to reflect this.

Overall, we strongly reject the MCA underlying the FDS and urge a complete rethink.

2. Introduction

2.1 Purpose of Report

This report peer reviews Auckland Council's (**AC**'s) *Draft Future Urban Development Strategy* (**FDS**) from an economics perspective, particularly the assessment of options in its *Growth Scenarios Evidence Report* (**GSER**).[1] For brevity, this report addresses only the most substantive issues arising, with a specific focus on the rationale for, and potential effects of, the proposed downzoning of large tracts of Future Urban Zone (**FUZ**) land due to alleged greenhouse gas (**GHG**) emissions impacts.

2.2 Background

Auckland is New Zealand's largest region by far, accounting for a third of its population, and a similar (or higher) share of total economic activity. While population growth slowed temporarily due to the pandemic's effect on migration, strong and sustained growth is still forecast well into the future.

In fact, the latest projections indicate the need for at least another 200,000 homes over the next 30 years, which is more than the current sizes of Hamilton, Tauranga, Dunedin, Queenstown, and Invercargill combined. Solid employment growth is also expected. So, there is still a challenge to ensure that enough homes of the right types and sizes are provided in the right places at the right time to keep pace with demand well into the long term.

The need to plan for strong and sustained population and economic growth is nothing new, though, with the region's current growth blueprint embedded in The Auckland Plan 2050's development strategy. It reflects the culmination of several years' concerted and collaborative effort by AC, local developers, and other key stakeholders (such as central Government and infrastructure providers).

The FDS, however, signals a wholesale departure from the current evidence-based approach to accommodating growth, including the proposed deletion of entire FUZ areas in flood-prone locations, with large chunks of FUZ areas elsewhere placed in limbo pending further investigation.

Given the overwhelming time and resource expended to agree the current approach, as per the Auckland Plan 2050, any proposal to depart from that – like the FDS – must be supported by comprehensive and exhaustive research and analysis that clearly spells out the case for change and proves that the FDS is a superior way forward.

In our opinion, however, the research and analysis underpinning the FDS – particularly its evaluation of different growth scenarios – is materially deficient and falls well short of the evidential threshold that one would rightfully expect given the circumstances.

2.3 Key Issues Addressed & Report Structure

This report focusses on the following aspects of the FDS's growth options assessment, which follow the key steps in the underlying multicriteria assessment (**MCA**):

[1] Available here https://akhaveyoursay.aucklandcouncil.govt.nz/85613/widgets/408922/documents/261986

1. **Option Definition**: The process of identifying and evaluating scenarios is unorthodox and potentially misleading. It incorporates a "utopian" hypothetical option that becomes a fictional benchmark against which the other scenarios are unfairly assessed (**section 3**).

2. **Criteria Identification**: The criteria are not well formulated, and place far too much emphasis on vehicle kilometres travelled (**VKT**) despite the widely-known limited ability for land use controls to materially affect GHG emissions (**section 4**).

3. **Option Scoring & Weighting:** The scoring and weighting of growth options in the MCA appears to skew the assessment towards those that match the FDS' new growth narrative (**section 5**).

4. **Consideration of capacity sufficiency:** The analysis errantly relies on plan enabled capacity, rather than feasible or likely realisable, when assessing the need for - and merits of – the FUZ (**section 6**).

5. **Impacts on Competition, Choice & Affordability**: The analysis pays little attention to impacts on key NPS-UD issues, such as land market competition, plus housing choice and affordability, despite the FDS being a key vehicle for helping achieve such objectives (**section 7**).

6. **Derivation of Preferred Strategic Direction**: Finally, the methodology used to translate the options analysis into the FDS' preferred/composite scenario is unclear and raises many unanswered questions (**section 8**).

3. Scenario Definition

3.1 Introduction

The first step in an MCA is to define the options for assessment. Typically, there are three to four options, with one being the status quo, so that any proposed changes can be readily compared to the current course of action. However, the FDS' approach to option definition is unorthodox and the resulting set of options raises many issues, as set out below.

3.2 Inclusion of Implausible/Extreme Scenarios

The process used to derive the four options and their associated characteristics is slightly unclear, but it has a major bearing on the overall direction and likely findings of the analysis. Of particular concern is the inclusion of an unrealistic benchmark scenario (Scenario A) that assumes different development patterns, home and job locations, and travel habits to the other three scenarios, but which are often masked or not properly acknowledged, causing the other three scenarios to be unfairly assessed.

For example, the executive summary of the GSER simply notes that "four growth options were developed, representing different spatial options for land use, accommodating a consistent quantum of Auckland's growth and change in dwellings and jobs over the next 30 years."[2] Similarly, on page 5, the report goes on to further state that: "four alternative growth scenarios were developed, each representing a different urban form."[3] Clearly, these descriptions imply that the four scenarios are equally plausible but differ (mainly) in their associated urban forms. However, that is not the case.

The fundamental differences between Scenario A and the other three becomes clearer throughout the rest of the document, with numerous obscured soundbites adding important context. For example, the following comment is buried amongst the detail on page 8:

> *"The evaluation found little difference between the scenarios in terms of model outputs relating to travel behaviour, except for Scenario A which…deliberately [included] significant shifts in land use patterns and transport assumptions."*[4]

Digging deeper, I discovered that even the process for deriving Scenario A differed from the others. Specifically, page 12 of the GSER acknowledges that the first three scenarios were derived via workshops held with subject matter experts. Scenario A, conversely, was derived during the development of the Transport Emissions Reduction Pathway (**TERP**) by a smaller subject matter expert group to "reflect a spatial distribution world where climate mitigation and adaptation interventions and land use planning were prioritised over other goals and objectives for the region."[5]

[2] GSER, page 4
[3] GSER, page 5
[4] GSER, page 8
[5] GSER, page 13

This hypothetical fourth scenario (derived by a smaller number of experts outside the workshops held specifically for that purpose) makes many unrealistic assumptions that render it a poor benchmark for evaluating other scenarios.

For example:

- Scenario A Incorporates fundamentally different, unsubstantiated transport assumptions that defy any like-for-like comparison with the other scenarios, including that:[6]
    - People with office jobs work from home 1 day per week (which is about triple the rate assumed for the other three scenarios); and
    - Public transport fares are $2 per trip forever (regardless of trip length/mode); and
    - The uptake of active travel modes is much greater than in the other scenarios.
- Plus, Scenario A assumes much higher levels of job and housing growth "to enable the model to make more decisions on uptake of development capacity including providing a significantly more mixed-use environment to support more dispersed employment locations".[7] Consequently, scenario A assumes much closer spatial matches between the locations of new jobs and new homes than the other scenarios, which directly bolsters its modelled travel benefits.[8]
- Scenario A assumes that relatively high-density development will occur throughout the region, even in remote rural areas, with 80% of future dwellings in rural nodes expected to be "attached" versus only 20% currently.[9]
- In addition, it features a superior public transport network with greater network reach and higher service frequency.
- Finally, Scenario A omnipotently withdraws capacity outside areas for intensification "as a way to influence the model to respond according with the scenario narrative."[10]

Because of these key differences in foundational assumptions, Scenario A is neither plausible nor realistic, so including it is inappropriate as it sets an unfair benchmark against which other scenarios are assessed. Interestingly, even the report itself appears to acknowledge the limited inferential value of this scenario, with the following admission made on page 28:

[6] GSER, page 19

[7] GSER, page 13

[8] This can be seen on page 15, where the assumed locations of new jobs and homes is almost perfectly spatially aligned in Scenario A compared to the other scenarios.

[9] GSER, page 20

[10] GSER, page 13

Figure 1: Excerpt from Page 28 of the GSER

> Overall, Scenario A performed the best across most criteria. Scenario A was specifically developed with significant shifts in land use planning and transport assumptions to better reflect the expectations of the TERP[8], to test whether modelled travel behaviour, mode share and especially transport greenhouse gas emissions would change compared with other scenarios. As such, the fact that Scenario A performed better provides some important lessons but does not necessarily provide the solution for spatial planning. However, these differences also makes it challenging to compare outputs on a like-for-like basis with the other scenarios, particularly when trying to identify the land use, transport, model input or other reason for these differences. The findings from the evaluation of Scenario A and the other three scenarios inform the spatial component of the Future Development Strategy.

In our view, the inclusion of Scenario A has significantly clouded the overall assessment of options and appears to reveal the degree to which some participants have "pushed the envelope" towards an ideologically preferred outcome. Despite all that, Scenario A still did not achieve the ambitious emissions reductions sought via the TERP[11] which, in our view, highlights the risk and futility of focussing too strongly on GHG emissions in developing the FDS.

In a similar vein, scenario D makes little sense because it reflects a highly dispersed urban form that also veers from the current agreed approach and thus is not credible. For context, scenario D sees only 52% of new homes being built inside existing urban areas, with 48% in the FUZ and rural areas. This too is a wholesale departure from the agreed "70/40" split underpinning the current strategy and therefore also has no plausible, real-world basis.

Coupled with the fanciful nature of Scenario A, the unusual spatial definition of Scenario D means that two of the four options are non-starters for determining the best way to accommodate growth in homes and jobs over time.

3.3 Absence of Status Quo Option

Not only is the assessment compromised by the inclusion of two unrealistic scenarios (A & D), which needlessly consume analytical resources while bloating FDS reporting, but there is also no scenario representing the status quo. This is unusual, because the default course of action for virtually any option assessment is to simply "do nothing" and carry on as-is. Absent such an option in the assessment, it is impossible to compare the potential impacts of proposed new directions to the current, evidence-based future development trajectory.

For the record, we note that Scenario C is the closest match to the status quo, but it also includes a series of undocumented adjustments that obscure any efforts to reconcile the proposed new strategic direction with the current agreed one.

[11] See page 31 of the GSER.

4. Evaluation Criteria

4.1 Introduction & List of Criteria

This section addresses several critical issues related to the criteria selected to evaluate options. For ease of reference, the table below lists the 29 criteria in the growth options MCA, which we have grouped according to the key themes emerging.

Table 1: Criteria in Growth Options MCA (grouped by perceived key themes)

Travel Impacts/Accessibility (11 criteria)
Degree to which essential social infrastructure/employment is accessible by multiple modes in high dep. areas
Extent to which education is accessible by different modes (public transport + active modes)
Extent to which employment opportunities are aligned with areas of population growth
Extent to which household living costs can be reduced by increased proximity to employment opportunities
Extent to which key areas of economic activity are accessible by different modes (public transport + active modes)
Extent to which population is exposed to harmful air emissions
Extent to which rural production areas are accessible
Extent to which scenarios promote mixed use communities to reduce travel distances and safety risks
Extent to which scenarios provide improved, inclusive, & equitable access to social infrastructure & public spaces
Extent to which travel times are reliable
The extent to which scenarios impact carbon emissions
Environment (4 criteria)
Extent to which development promotes the restoration/connectivity of indigenous biodiversity
Extent to which development provides opportunities to improve the health of natural wetlands (brownfields)
Extent to which development provides opportunities to improve the health of natural wetlands (greenfields)
Extent to which options reduce the ability to swim safely and collect shellfish
Land & Housing Markets (4 criteria)
Extent to which growth creates greater housing choice to meet projected demand
Extent to which physical constraints increase the cost of development
Extent to which suitable land is available for Group 1 (land extensive) industries
Extent to which the market is likely to respond to the proposed land use pattern
Social/Culture/Heritage (2 criteria)
Extent to which scenarios are likely to result in improved levels of access to quality open space
Extent to which scenarios retain qualities of historic heritage places and values
Economy (2 criteria)
Extent to which opportunities for the agglomeration of similar/dependent industries are provided
The degree to which urban development consumes highly productive soils
Infrastructure (2 criteria)
Extent to which scenarios support current committed infrastructure
The extent to which scenarios result in measurable public monetary costs or losses over time from infrastructure
Māori (2 criteria)
Extent of Māori land within growth areas
Extent to which scenarios impact on Māori cultural landscapes
Natural hazards/Climate adaptation (2 criteria)
The extent of new urban development areas in 100-year floodplains (brownfields)
The extent of new urban development areas in 100-year floodplains (greenfields)

We now discuss several substantive concerns arising from the breadth and depth of these criteria.

4.2 Circularity Between Options & Criteria

The criteria used to assess FDS options reflect the collective input of many stakeholders, particularly the expert group convened to evaluate options. While that is fine, the overall process for deriving the assessment criteria is unclear and has resulted in a troublesome circularity between the scenarios and the criteria evaluating them. For example, page 8 of the GSER states:

> *"While the scores provide a useful indicator of the relativities between the scenarios, there was a strong inter-relationship between the scenarios and the criteria they are measured against. Therefore, the findings drawn from the results of the evaluation are thematic."*

This circularity between options and scores, and the resulting thematic nature of the results, is unusual and highly misleading. The criteria should be derived independently from the options to avoid potential bias, especially when the scores derived in the MCA depend on experts exercising their professional judgement in insolation (evidently) at remote, independent evaluation sessions.

4.3 Decision to Ignore Common Ground

Another issue with the evaluation criteria is the unusual decision to ignore common ground and focus only on option differences. Specifically, page 21 of the GSER lists various evaluation themes (i.e. criteria), which were initially deemed important, but then many are disregarded entirely or considered only fleetingly because the evaluators decided to look only at points of difference. In the words of the report:[12]

> *"Having considered the range of criteria identified, it was then determined that only criteria that would differentiate the scenarios should be taken through into the evaluation process."*

While option differences may be of greater analytical interest than commonalities, omitting criteria where options perform similarly systematically distorts the scale of reported option differences. Conversely, by including all criteria in the assessment, even those where options are expected to perform equally, readers can gain a full picture of option similarities *and* differences.

At the same time, focussing only on differences has meant that several key criteria are not covered in any meaningful detail (presumably because they were deemed by evaluators as areas of common ground), including: [13]

- Development feasibility;
- Housing affordability; and
- Ensuring there is enough land for business.

In our view, the GSER unhelpfully focusses on a carefully curated set of criteria that are designed to amplify option differences while simultaneously masking a high degree of common ground. Overall, this is an unhelpful and misleading way to frame the analysis.

[12] GSER, page 22

[13] See the list of initial criteria themes in Box 3 on page 22 of the GSER.

4.4 Undue Fixation on Travel Impacts & Accessibility

Transport has always been an important consideration to help determine where and when to enable growth in the population and the economy over time, particularly access to public transport and potential for active travel. That said, the FDS appears to place excess weight on travel accessibility and its impacts, particularly since the MCA has no criteria weightings.[14] Absent such weights, the more criteria there are per theme, the greater the weight that theme carries in the assessment.

As per the table above, transport impacts and accessibility – as we have categorised them – account for 11 of 29 criteria (or 38%), compared to only two criteria for natural hazards and climate change adaptation/mitigation (7%). This means that transport and accessibility effects receive more than five times the weight of climate change adaptation and mitigation effects in the growth options assessment (i.e 38% vs 7%). While transport impacts and accessibility *are* important, the FDS's fixation on them is a concern for the reasons set out below.

4.4.1 Future Travel & Emissions are Mostly Baked-In

Auckland's future spatial form, and thus its future transport emissions, are already largely baked-in due to its existing population and economic activity, with growth therefore having only marginal effects overall. This is a key finding of the FDS, which states the below in its executive summary:[15]

> *"Most of Auckland's future spatial form already exists and growth has limited influence."*

Later, on the same page, it elaborates that:[16]

> *"Key destinations for household trips, such as employment areas and education facilities, are well established, so changing the location of future dwellings (e.g. adding more origins) does not materially affect existing travel patterns other than reinforcing them by adding more trips."*

Indeed, with 1.7 million existing residents, the region's spatial form is mostly "baked-in" with growth representing only small changes. Consequently, focussing on marginal changes in $C0_2$ emissions between growth options, while placing little weight on other important factors, seems inappropriate and ultimately unhelpful.

4.4.2 Cars Account for Only a Small Share of Total CO_2 Emissions Anyway

Not only will the FDS have trivial impacts on the region's future emissions profile, but light passenger vehicles (i.e. cars) also account for only a modest fraction of national CO_2 emissions anyway. This is illustrated in the table below from the latest Greenhouse Gas Inventory (published in 2023).[17] It shows that cars produce only 8% of total (gross) CO_2 emissions, and hence that policies aimed at curbing GHG emissions from cars will have limited impacts on meeting national emissions targets.

[14] GSER, page 21
[15] GSER, page 8
[16] GSER, page 8
[17] https://www.mfe.govt.nz/climate-change/state-of-our-atmosphere-and-climate/new-zealands-greenhouse-gas-inventory

Table 2: Shares of Gross $C0_2$ Emissions by Group in 2021

Emitter Groups	$C0_2$ Emissions Shares
Agriculture	49%
Manufacturing	8%
Energy Producing Industries	7%
Industrial Processes	6%
Other Productive Sectors	6%
Road Transport - Cars	8%
Road Transport - LCVs	3%
Road Transport - HCVs	5%
Other Transport	2%
Waste/Tokelau	4%
Fugitive Fuel Emissions	1%
Total	**100%**

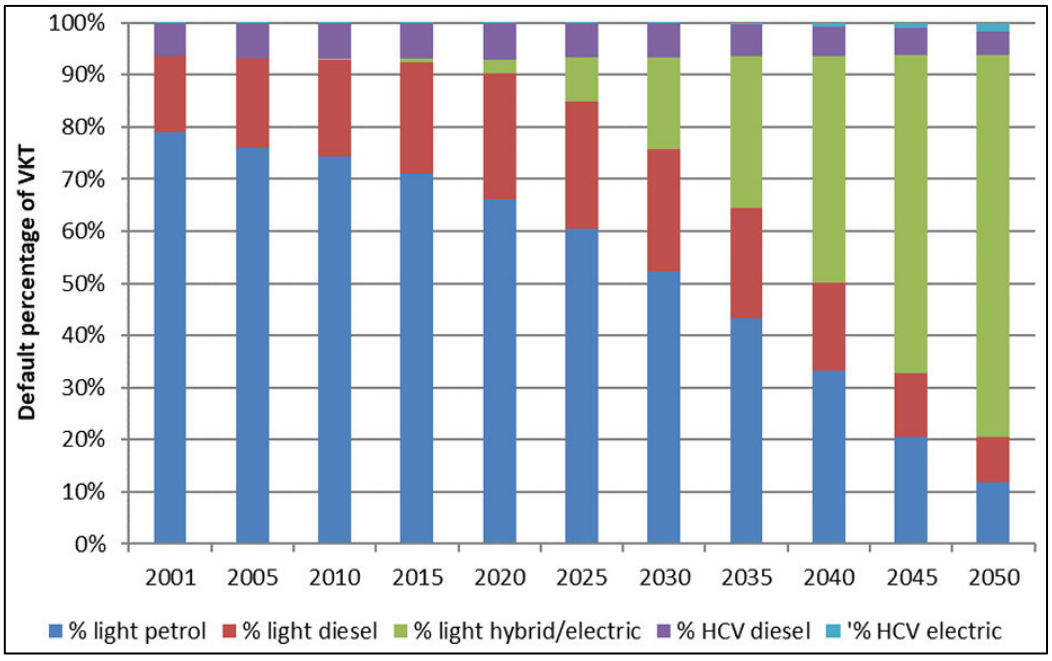
4.4.3 Car CO_2 Emissions Are Falling Rapidly Already

Not only do cars account for a slim share of national CO_2 emissions, but the average CO_2 emissions of cars is already falling due to rapid shifts towards electric, hybrid, and other low-emissions vehicles. This is illustrated in the chart below, which shows the projected composition of future VKT according in the Vehicle Emissions Prediction Model (**VEPM**), developed jointly by Waka Kotahi (**WK**) and AC.

In the graph below, the:[18]

- Blue segments represent the share of total VKT by petrol-powered cars, and
- Green segments represent the share of total VKT by hybrid and fully electric vehicles.

Figure 2: Historic & Projected Shares of VKT by Vehicle Type and Motive Power



[18] https://www.nzta.govt.nz/assets/Highways-Information-Portal/Technical-disciplines/Air-quality/Planning-and-assessment/Vehicle-emissions-prediction-model/VEPM-6.3-technical-report-2022.pdf

Figure 2 above shows that petrol-powered cars accounted for nearly 80% of total VKT in 2001, but will reach about 60% by 2025. By 2050, petrol cars will account for just over 10% of total VKT, with hybrid and electric cars accounting for more than 70%. Given this rapid background trend, it follows that trying to reduce Co2 emissions via the spatial location of new jobs and homes will have very little impact overall and thus is not an appropriate primary focus for the FDS.

Interestingly, the relative importance of fleet electrification, and the limited scope to affect change via land use controls, was clearly acknowledged in the Auckland Climate Plan (**ACP**), which the FDS seeks to give effect to. For example, the ACP notes the following emissions reduction potential by policy initiative (on page 51):

- Remote working and reduced trip lengths –10% emissions reduction.
- Shifts to PT, walking and cycling – 14% emissions reduction.
- Switching to low-emissions vehicles – 55% emissions reduction.

Given that the FDS will have only minor impacts on the first two categories, its overall potential to accelerate ongoing CO_2 emissions reductions is limited and must be recognised as such.

4.4.4 FUZ GHG Analysis is Flawed & Misleading

According to the FDS, large areas of FUZ are pending further investigation due to natural hazards and the potential for higher-than-desired GHG emissions. We agree that development should be managed in flood-prone areas, or those at undue risk of natural hazards. However, we fundamentally disagree with potentially downzoning large swathes of FUZ due to estimated GHG impacts, because the underlying modelling is stacked against the FUZ. We elaborate below.

To estimate the future GHG emissions of different growth nodes, including the FUZ, various transport and land-use models were run iteratively to determine origin-destination matrices showing the travel patterns for 554 zone (i.e. locations) across Auckland. Mapping those fine-grained model zones to AUP zones, the travel impacts of each growth scenario could be readily estimated.

While the overall modelling approach is fine, the analysis captured only the current snapshot (as at 2022), when many FUZ locations were not well-developed and had relatively poor balances between homes and jobs. In short, by failing to reflect the self-sustaining future state of each FUZ area due to a balanced provision of residential *and* business land (as per their structure plans), the modelling grossly overstates the likely travel impacts of FUZ areas. This major limitation of the VKT and GHG assessment is documented on page 82 of the Future Urban Areas Evidence Report, as per the screenshot below.[19]

[19] Future Urban Areas Evidence Report, page 82.

Figure 3: Caveat of the Future Urban Areas Evidence Report Transport and GHG Assessment

- Presented data is a snapshot in time – some locations may be quite early in their development cycles and (modelled) travel behaviour may change as a result of further development (eg a FUA develops with stage 1 mostly residential, stage 2 mostly employment, but at the time of assessment, only Stage 1 residential development is underway, with PT services expected later, leading to long Car commutes (high VKT and low population) for early residents)

To understand the implication of this, consider the plight of Milldale and the FUZ surrounding it. Not only is Milldale one of New Zealand's largest residential subdivisions, but it is also adjacent to Silverdale West, where about 600 hectares of light industrial land will eventually be live-zoned. However, because the travel analysis reflected only the situation in 2022 when the Silverdale West business node was yet to commence, the travel impacts of Milldale and surrounding FUZ areas were systematically overstated. Conversely, if the model had been rolled forward to include the future employment area nearby, plus the various commercial areas yet to be fully developed within Milldale, its modelled impacts would differ vastly. The same applies in other FUZ areas where residential growth has preceded job growth, or vice versa.

Interestingly, despite this inherent bias against the FUZ, the modelling still showed that people living in the FUZ would generate near-identical rates of CO_2 to those in the existing urban area. In fact, the modelled car CO_2 per household for the FUZ was *lower* than for the existing urban area. See Table 3 below.[20]

Table 3: Outputs of Travel Model for CKT and CO2 by Household Origin

Origin	VKT/Car/Household	Car CO_2/household
Existing urban	48.60	3.31
FUZ	50.59	3.30
Rural	69.74	4.51
Out of Region	51.94	3.40
Total Auckland	**50.39**	**3.40**

4.4.5 Failure to Consider Other Options to Reduce CO_2 Emissions

Reducing CO_2 emissions is a task shared by all levels of Government, each with its own set of levers. For example, Central Government can introduce emissions standards for vehicles entering the fleet, or it can raise petrol taxes, to name but a few. Local Government, on the hand, has a smaller set of tools to play with, so the focus appears to have settled on the use of land use controls to reduce average travel distances.

We agree that shorter trips and greater use of public transport and active modes are important policy targets for Local Government. However, they are not the only tools available, with others being important additions. For example, the ACP identifies the following other ways to help improve Auckland's future GHG emissions profile (some of which may require central Government support):

[20] Future Urban Areas Evidence Report, page 91.

- Reduce private vehicle travel and encourage lower emissions travel options by introducing pricing and parking measures[21]; and

- Implement policies and regulations that facilitate faster uptake of lower emissions vehicles.[22]

And, according to recent policy research, travel demand management (**TDM**) measures like road pricing and parking charges are more effective at reducing VKT than land use controls or mode shifts to public transport (**PT**).[23]

4.5 Intensification Amenity Effects

Unlike its strong focus on transport, the FDS appears to pay little – if any – attention to the potential adverse effects of intensification even though they will vary by scenario. These effects have been widely canvassed in recent policy work, both here and overseas, including a cost benefit analysis completed by Sense Partners and PWC for the MDRS.[24] It identified the following common adverse amenity effects of intensification, none of which appear to be adequately considered in the FDS, particularly for scenario A that relies on widespread intensification.

- Loss of views;
- Shading and loss of sunlight;
- Noise pollution; and
- Light pollution.

Note: while the NPS-UD & MDRS accept that such effects will occur and implore Councils to enable intensification anyway, they are still relevant to the comparison of options (from an economic perspective) but are notably absent from the assessment.

4.6 Impacts on Housing Sufficiency, Choice & Affordability

Finally, we note that the FDS provides very limited coverage on key NPS-UD objectives, such as land market competition, capacity sufficiency, housing choice, and affordability. Given the significance of these concerns, they are addressed separately in sections 6 and 7 below.

[21] ACP pages 82 and 142

[22] ACP page 144

[23] See, for example, the findings of this report: https://www.transport.govt.nz/assets/Uploads/Discussion/DiscussiondocumentHikinateKohuparaKiamaurioraaiteiwiTransportEmissionsPathwaystoNetZeroby2050.pdf

[24] https://environment.govt.nz/assets/publications/Cost-benefit-analysis-of-proposed-MDRS-Jan-22.pdf

5. Option Scoring & Weighting

5.1 Introduction

Once growth options/scenarios and evaluation criteria are identified, the next step in an MCA is to score options against criteria, before weighting the scores to derive an overall ranking of options. In this section we discuss several issues related to the scoring and weighing of criteria.

5.2 Reliability of Model Inputs & Outputs

According to the GSER, the scores derived for each criterion reflect the outputs of an iterative modelling exercise combined with expert judgement. While we agree that a wide range of complementary quantitative and qualitative data should be used to score options wherever possible, we have some concerns about the reliability of the model's inputs and outputs.

First, some of the model's inputs are out-of-date. For example, the modelling assumes the need to accommodate an extra 408,000 dwellings and 380,000 jobs over the next 30 years, compared to only about half that amount in the FDS itself. By modelling much higher levels of growth than are now anticipated, the analysis overstates the travel (and GHG emissions) impacts of each option.

Other inputs of concern include the unreferenced and unsubstantiated assumptions that:

- A city centre cordon and road pricing are in effect from 2031 and 2041, respectively[25]
- Infrastructure required for all options is technically feasible[26]

While the latter is likely for the FUZ where infrastructure requirements have been closely studied, the same cannot be said for the infrastructure required to support widespread intensification under PC78 (whose newfound capacity is integral to the FDS's proposed new direction).

Second, the reliability of the model's processes, and hence outputs, is also a concern. For example, page 12 of the GSER admits that the model crashes and breaks if there is insufficient capacity, which raises concerns about its robustness and reliability. Further, page 18 of the GSER admits that the model has limitations around capturing behaviour change even though that is critical to realising the alleged benefits of certain scenarios. Even worse, page 24 states that:

> *"To direct 'take up' to specific locations sometimes required plan-enabled capacity to be reduced or capped to limit take up and force the model to develop in accordance with the scenario narrative."*

This is a startling confession. Interfering with the model's operation and forcing it to take actions that suit a scenario narrative directly invalidates its outputs and casts serious doubt over the objectivity of the overall modelling process itself.

[25] GSER, page 17

[26] GSER, page 18

5.3 Reliance on Expert Judgement

We are also concerned that expert judgement has played such a major role in scoring the scenarios. For example, the following matters were primarily evaluated by the subject matter experts:[27]

- Natural hazards
- Carbon emissions
- Housing choice
- Biodiversity
- Health of water bodies
- Water quality
- Highly productive soils
- Natural and built heritage
- Access to social infrastructure
- Air quality
- Māori and cultural landscapes
- Costs of development
- Infrastructure
- Market feasibility

These considerations are broad and far reaching, so it is essential that an appropriate mix of experts is used to assess them. However, the number of experts engaged, their qualifications, experience, and areas of expertise are not divulged, which raises concerns that a sufficiently deep and broad mix of expertise has been brought to bear. This is compounded by a comment on page 25 of the GSER which identifies the expert group as comprising only members of the (unnamed) project team plus subject matter experts from Council departments and CCOs.

In our view, the absence of any expert input from other key stakeholders, such as FUZ landowners, dramatically reduces the credibility and reliability of scores derived via expert judgement.

5.4 Many Criteria are Assessed by Narrow/Misleading Measures

There are also several specific scoring issues that appear to hamper the assessment's reliability and directly reinforce scenarios that fit a particular narrative.

The first specific scoring issue is that many criteria in the MCA are assessed against measures that appear unduly narrow, incomplete, or misleading. These include:

- **Access to open space** is measured by the number of households and people within a walkable catchment of an open space that is at least 3000m^2.[28] Not only is this size threshold arbitrary, but the criterion itself does not consider the quality of the experience, nor the likelihood of congestion occurring at existing parks in scenarios with high intensification.

[27] GSER, page 25

[28] GSER, page 36

- The **extent to which population is exposed to harmful air emissions** from transport focusses on the *generation* of emissions, not the population's *exposure* to them.[29] This is highly misleading given the criterion's title, and it obscures the likely health impacts of scenarios that rely on high levels of intensification (such as Scenario A). Instead, this criterion assigns scenario A the highest score possible.

- **Access to social infrastructure** was defined to include access to hospitals via active modes or PT.[30] We consider this unhelpful because hospitals are visited only seldomly. And, when they are accessed, it is usually in a hurry via a car or ambulance. Accordingly, the accessibility of hospitals via PT and active modes is a crude and very narrow way to measure each option's access to social infrastructure.

- Similarly, **access to social infrastructure and employment in high deprivation areas** is partly based on accessibility to tertiary education via active modes or PT.[31] Again, however, very few regional residents are enrolled in tertiary education, so this is an unduly narrow way to measure the overarching criterion. Not only that, but many people are now regularly accessing tertiary education online.

- The **extent of Māori land within growth areas** was crudely inferred via GIS estimates of proximity to Marae and other similar landmarks, without any input from Mana Whenua, despite the assessment recognising that:[32]

  > *"Only Mana Whenua can determine what impact the scenarios would have on Māori land and what types of Māori land are of greatest priority…[but the assessment] does not represent the views of Mana Whenua."*

- **Accessibility to key economic activity** was measured in reference to only the city centre, airport, metropolitan centres, and town centres. While those undoubtedly are areas of key economic activity, they are not the only ones. Others that could/should have been included are the large swathes of business/mixed-use/light industrial zones that span the region:[33]

- **Access to education** was measured by access to tertiary education by PT and active modes.[34] However, as already noted, only a small share of the region's population is engaged in such study and many are now studying online. Moreover, students enrolled in tertiary education are likely to self-select living locations that are relatively close to their place of study, so this specific measure is of limited value for differentiating options.

[29] GSER, page 37.
[30] GSER, page 40.
[31] GSER, page 41.
[32] GSER, page 43.
[33] GSER, page 45.
[34] GSER, page 47.

- **Household living costs** are measured by the extent to which living costs can be reduced by increased proximity to employment opportunities. However, according to the Household Economic Survey (**HES**), transport costs are only about 10% of weekly household spending. Coupled with the fact that travel to work accounts for only 20% of weekly travel, this criterion effectively focuses on an issue that represents only about 2% of weekly spending.

- **Costs of development** were measured only by the extent to which physical constraints (like contour or instability) may affect them.[35] This is an incredibly narrow view of development costs and, amongst other things, overlooks the effects of lower land market competition on section prices. At the same time, it penalises development in newer areas where land is yet to be shaped and readied for buildings, while glorifying intensification, despite noting that:

  > *"At the evaluation workshop, the relativity between scenarios was agreed because Scenario D takes development into more marginal land. However, it is also acknowledged that within existing urban areas there may be additional development costs that are not addressed by the evaluation."*

- **The extent to which the market is likely to respond to the development pattern** conflates areas with high land value as areas that are attractive to the market, even though the opposite is often the case.[36] i.e. the market often prefers lower cost options.

5.5 Cardinal Nature of Model Outputs Not Reflected in Scores

The next specific scoring issue is that the cardinal nature of the modelling outputs is not reflected in the MCA scores. For example, an option may have scored only slightly better than another on a particular criterion according to the modelling, but the MCA scores imply that it performed two or three times better overall. This issue affects at least four of the MCA's 29 criteria, including:

- The extent to which scenarios impact carbon emissions (page 32);

- Mixed use communities (page 40);

- Accessibility to key economic activity (page 45); and

- Infrastructure costs (page 55).

5.6 Scoring Does Not Reflect Preceding Discussion

Finally, we note that the scoring for several criteria do not reflect the preceding discussion in the GSER. This issue affects at least six of the MCA's 29 criteria, including:

- The degree to which urban development consumes highly productive (page p35);

- Housing choice (page 39);

[35] GSER, page 56.

[36] GSER, page 57.

- Access to social infrastructure by high deprivation areas (page 42);
- Access to education (page 47);
- Household living costs (page 50); and
- Costs of development (page 56).

5.7 Decision Not to Weight Criteria

As noted earlier, the expert evaluators made the unexplained decision not to weight the criteria when assessing options. This is highly unusual, and it directly elevates the importance of some factors while systematically downplaying others. That's because, absent weights, the more criteria per theme, the greater the weight afforded that theme in the evaluation, and vice versa.

For example, suppose that one theme is measured by 10 criteria, while another theme is measured by only two criteria. If weights are not applied, the first theme carries five times as much weight in the overall MCA than the other. Usually, this is addressed by applying weights that mitigate differences in criteria breadth and depth, but that is not the case here.

The following table puts the issue in context by showing the share of the MCA's 29 criteria that fall into (our suggested) evaluation themes, and the implied weighting on each overall. Clearly, the absence of weights causes some themes to be given excess weight at the expense of others, which lacks explanation and almost invariably distorts the assessment of options.

Table 4: Number of Criteria and Implied Weighting by Evaluation Theme

Evaluation Themes	**Number of Criteria**	**Implied Weight**
Travel Impacts/Accessibility	11	38%
Environment	4	14%
Land & Housing Markets	4	14%
Social/Culture/Heritage	2	7%
Economy	2	7%
Infrastructure	2	7%
Māori	2	7%
Natural hazards/Climate adaptation	2	7%
Total	**29**	**100%**

6. Consideration of Capacity Sufficiency

6.1 Introduction

The NPS-UD requires Auckland, like all high growth areas, to provide at least sufficient housing and business capacity to meet demand (at all times) right through to the long term, including providing a range of options to meet varying needs, preferences, and budgets. The NPS-UD also specifies different types of capacity that must be assessed, which vary according to whether they are:

- Plan-enabled;
- Serviced (or serviceable) with infrastructure;
- Feasible for development; and
- Likely to be realised over each NPS-UD timeframe.

These different measures of capacity are critical to understanding whether planning decisions, such as future development strategies, enable enough capacity to meet likely future demand. Unfortunately, however, the FDS remains relatively silent on these matters and appears to pay little attention to capacity sufficiency. We elaborate briefly below.

6.2 Reliance on PC78 Plan-Enabled Capacity

Section 3.3 of the FDS addresses development capacity, albeit only at a high level. It refers to plan-enabled capacity for an additional 2.35 million additional dwellings, much of which stems from recent theoretical capacity uplifts ushered in by PC78. For ease of reference, the table below shows the broad location of this plan-enabled capacity relative to the distribution of existing dwellings.

Table 5: Location of Plan-Enabled Capacity Relative to Existing Spatial Form

Existing urban	% of Existing Dwellings	% of Plan-Enabled Capacity
Central City	5.0%	3.5%
Inner Suburbs	3.4%	1.5%
Eastern Brownfield	10.9%	10.9%
Isthmus Brownfield	26.9%	26.0%
Northern Brownfield	16.4%	16.2%
Southern Brownfield	13.2%	16.2%
Western Brownfield	6.7%	6.6%
Greenfield		
Northern-western Greenfield	10.9%	9.1%
Southern Greenfield	1.5%	3.0%
Rural		
Northern Towns	1.6%	2.4%
Rural	1.0%	0.7%
Southern Towns	2.6%	3.8%
Auckland Totals	**100.0%**	**100.0%**

An important observation from this table is that PC78 has boosted capacity in relatively remote existing urban locations, such as southern Brownfield where job accessibility is poor, but produced very little capacity in areas that are favoured by the growth options assessment. For example, the city centre accounts for 5% of existing dwellings, but only 3.5% of plan-enabled capacity. Similarly, the inner suburbs account for 3.4% of existing dwellings, but only 1.5% of plan-enabled capacity. On

the other side of the ledger, northern and southern rural towns account for a notably higher share of plan-enabled capacity than their corresponding shares of existing dwellings.

Thus, while PC78 may enable unprecedented levels of plan-enabled capacity, it does not necessarily help meet the region's goal of a compact urban form. In fact, because the capacity uplifts caused by PC78 are inversely proportional to the density already enabled by the AUP, it significantly boosts capacity in peripheral locations, but has relatively little impact in and around centres where higher density is already permitted.

This is reflected in the excerpt below, which shows the location of plan-enabled capacity relative to the city centre.[37] Given these insights, it is important not to get waylaid by the very large (aggregate) plan-enabled associated with PC78 and instead drill-down to consider whether that supposed theoretical capacity helps achieve the desired compact urban form. Potentially not.

Figure 4: Location of PC78 Plan-Enabled Capacity Relative to City Centre

5.2.4 Enabled Capacity by Distance from the CBD

The plan-enabled capacity in each travel distance band from the city centre is shown in Table 5-1, and compared with existing dwelling numbers. The plan-enabled capacity increases with distance outward from the city centre. Under the current AUP, there is plan -enabled capacity for close to 231,000 dwellings within 6km of the centre. The NPSUD/MDRS provisions without QMs would enable some 371,000 dwellings. With all QMs in place, the plan-enabled capacity would be some 276,000 dwellings. This is about 3.8 times the current 79,000 dwellings there.

Table 5-1 : Plan-Enabled by Distance from CBD

Distance from CBD (km)	Existing Dwellings	MDRS/ NPSUD No QMs	MDRS/ NPSUD (with all QMs)
0-2	28,800	96,500	90,000
2-3	13,500	67,900	40,000
3-4	10,500	57,700	36,100
4-5	10,900	61,400	44,600
5-6	15,200	87,500	65,000
0-6	79,000	371,000	276,000
6-10	87,000	478,900	414,600
10-12	45,100	304,900	281,200
12-15	66,700	411,100	370,300
0-15	278,000	1,566,000	1,342,000

Source: Housing Enablement Model 2022

Another issue is that PC78 is now effectively on hold, so it seems inappropriate to continue relying on its potential theoretical capacity. If PC78 is later withdrawn or revised substantially, there may be major implications for capacity sufficiency, but this is not properly acknowledged in the FDS. Moreover, plan-enabled capacity is a purely theoretical metric that has no real-world meaning, so relying on it here is, in our view, imprudent.

[37] PC78 Economy Matters section 32 report, page 99.

6.3 Assessing Serviceability, Feasibility & Realisability

Another concern is that FDS does not explicitly consider the infrastructure serviceability of growth associated with each scenario. Instead, it simply assumes that any infrastructure required to service growth will be technically feasible.[38] That will not always be the case, though.

Take, for example, the upgrading or replacement of a water or wastewater trunk main through a densely developed part of the existing urban area. The disruption associated with such an upgrade may render it technically (and/or practicably) infeasible, and this is more likely for growth scenarios that rely heavily on intensification. Again, however, this is not addressed in the FDS.

Similarly, the FDS and its accompanying evidence reports does not appear to properly consider financial feasibility. Instead, it invokes the following logic, presumably as a reason not to bother.[39]

Figure 5: Future Urban Areas Evidence Report Comments on Residential Capacity

1.3.5 Residential development capacity

The statutory requirement to apply MDRS to Auckland's residential zones has changed the development landscape by substantially increasing residential development capacity.

The draft FDS meets the statutory requirement under the NPS-UD to ensure there is at least sufficient housing and business development capacity to meet demand over the next 30 years. (Auckland Council, 2023d). Therefore, the draft FDS does not focus on identifying significant additional plan enabled development capacity. The focus is rather on the quality aspects of accommodating growth; where and how development take-up occurs.

This sentiment is echoed in the FDS itself, which states that plan-enabled capacity is several times the level of expected demand[40], which evidently provides some latitude. Then, it claims that "much of this enabled capacity is or will be commercially feasible" but that not all needs servicing now.

We consider it inappropriate to merely assert that a high proportion of plan-enabled capacity will be feasible without doing the work to prove it. Indeed, development feasibility has changed dramatically over the last few years due to the compounding effects of lower house prices, higher construction costs, and significantly higher interest rates. Together, these changes conspire against feasibility and may result in a shortfall, particularly over the longer term.

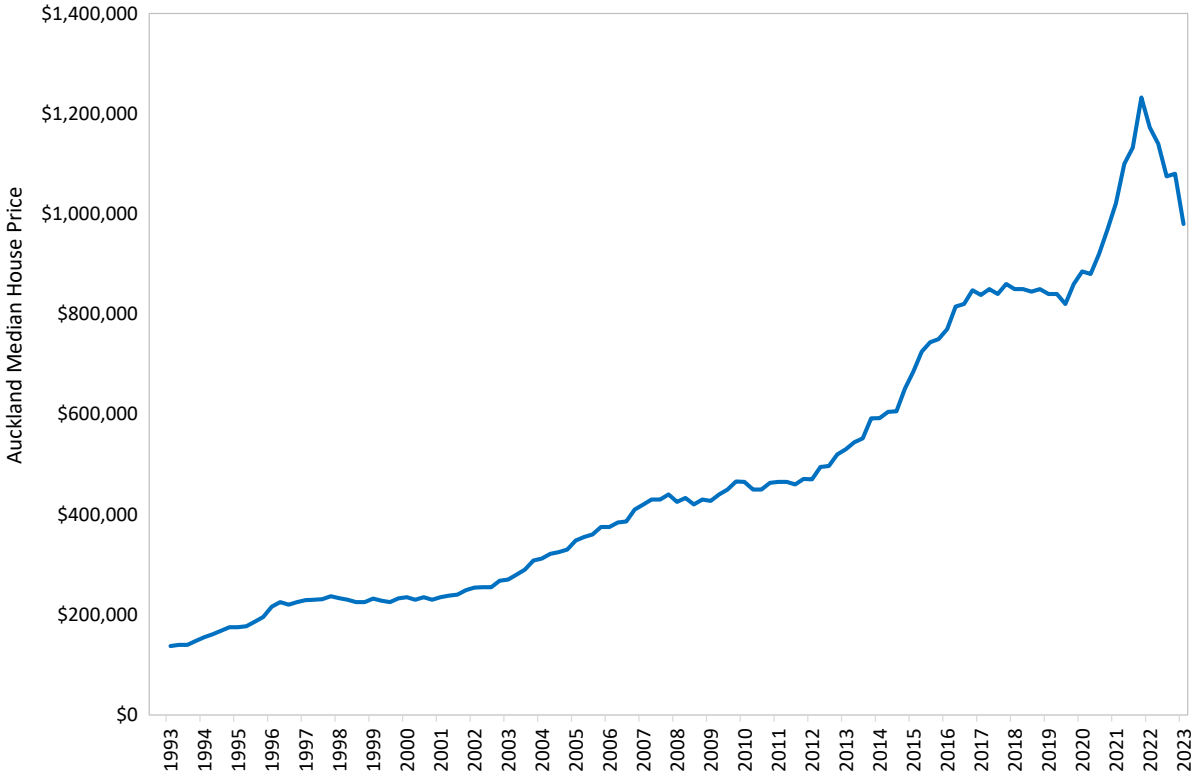
For context, the chart below shows how Auckland's median house price has tracked over time. While it has climbed steadily since the early 1990s, the region's median dwelling price has fallen precipitously from about mid-2021 onwards (when the FDS' modelling appears to have been done). In fact, the median price has fallen from $1.23 million in mid-2021 to only $980,000 in early 2023, a drop of more than $250,000 (or 20%) in less than two years. Coupled with the near-30% increase in residential construction costs over the same period, it should be clear that development feasibility has changed fundamentally and hence that relying on previous feasibility analyses is inappropriate.

[38] GSER, page 18.

[39] Future Urban Areas Evidence Report, page 14.

[40] FDS, page 29

Figure 6: Auckland Median Dwelling Price (from NPS-UD dashboard)



Not only does the financial feasibility of development appear to mostly be overlooked by the FDS and the GSER but, when it is considered, it is via an unorthodox approach that is unlike anything we've ever seen before. Specifically, the GSER summarises its approach to estimating development attractiveness and feasibility as follows:[41]

> *"The attractiveness of a [MSM transport] zone is determined through the land use model based on various aspects. Firstly, it looks at the permissible development (capacity together with the projected household and employment growth) to determine how much additional development is required to accommodate growth.* ***It then looks at the "rent values" in each to determine which zones are profitable to develop*** *(from developer's point of view higher rent means more profit). Baseline rent values are from the Council's rating database."* [emphasis added]

In terms of likely realisable capacity, the FDS appears to rely on historic uptake to determine that sufficient realisable capacity exists. Specifically, it states:[42]

> *"Take-up has been high in almost all areas where intensification has been enabled by the AUP, including in relatively low land-value locations. Ongoing take-up of these opportunities is reasonably expected wherever they are provided."*

We agree that take-up will continue, but not necessarily like it has before. First, financial feasibility has changed substantially. Second, many of the best intensification opportunities have already been

[41] GSER, page 24
[42] FDS, page 30

taken up, with remaining ones likely to be more marginal. Third, the capacity unlocked by PC78 is not like the capacity unlocked by the AUP, so this statement is a false equivalence.

6.4 Consideration of Business Land Needs

Finally, we note that the FDS appears to pay scant attention to ensuring that sufficient business land is provided in the right places at the right time to keep pace with demand. Instead, the FDS simply asserts that:[43]

> *"There is likely to be at least sufficient plan-enabled business capacity on an aggregate, region-wide basis."*

However, this is immediately qualified in the next paragraph as follows:[44]

> *"Shortfalls in some sub-regions, or for specific business sectors, particularly for land extensive sectors could occur in the short to medium term. Over the medium to long-term, these are planned to be addressed by the provision of additional business-zoned land, including through the provisions of new centres in new development areas."*

We agree that there will be shortfalls in business capacity over the short- to medium-term for certain parts of Auckland and/or specific business sectors. This is reflected in the current, historically low vacancy rates prevailing in many of the region's business property markets.

For example, a Colliers research report for the first quarter of 2023 noted that the region's industrial property market had reached a historically low level of vacancy, with the vacancy rate for prime industrial properties falling to only 0.5%.[45] In some southern industrial areas, such as Manukau/Wiri and East Tamaki, there were virtually no vacancies as at the time of their survey. This is a concern, because a lack of vacant premises stifles opportunity and may even cause some businesses to be displaced to other regions, such as the large new business area in Pokeno.

Other recent research reports draw similar conclusions. For example, Bayleys[46] recently noted that "historic low levels of vacancies, combined with strong demand from occupiers, is often resulting in spaces being leased well in advance of actual lease expiry dates or physical vacancies." This is highly unusual and reveals the extent of current industrial land shortages.

The Bayleys report goes on to state that "persistent shortages of industrial land have led to substantial growth in prices. Would-be owner occupiers are increasingly having to extend their search perimeters [sic] out to the fringe of the region or even into other regions." Other research by CBRE[47] and JLL[48] also report incredibly low vacancy rates for many business property markets, which confirms an acute need to provide additional business land now.

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[43] FDS, page 31

[44] ibid

[45] Colliers, Auckland Industrial Snapshot for Q1 2023, page 1.

[46] Bayleys, Industrial Market Update, Auckland Q1 2023

[47] CBRE, Auckland Property Market Overview, Q1 2023

[48] JLL, Market Snapshots Q1 2023.

Despite this backdrop of a dearth of available business land, the FDS appears to take a rather cavalier attitude to planning for growth in business activity. It cites fanciful estimates of vacant and vacant potential capacity within existing business areas[49] and appears to presume that this can meet short to medium term needs.

Not only do we categorically reject the FDS' estimates of additional business capacity residing within existing areas, but we also consider its assessment of the need for additional business land to be internally inconsistent. On one hand, it notes that at least 1,000 hectares of business land will be needed in new urban areas, but on the other it appears to delay the rezoning/enablement of them. For example, it seems that the rezoning of the Silverdale West business area has been pushed back despite being a critical part of the blueprint for that area.

In our view, the FDS's approach to business land is reckless. Not only will it starve the market of much needed boosts in supply to rectify existing shortfalls and keep pace with projected growth in demand, but it will also push up land prices and thereby undermine affordability for businesses looking to establish, expand, or relocate within the region.

[49] For example, it estimates unrealistic levels of plan enabled capacity above ground floor in areas where ground floor locations are not only preferred, but often essential for access and other reasons.

7. Impacts on Choice & Competition

7.1 Introduction

Just as the FDS provides only very limited commentary on capacity sufficiency, so too does it pay surprisingly little attention to other NPS-UD objectives, such as land market supply, competition, plus future housing choice and affordability. We briefly touch on these issues below.

7.2 Importance of Fostering & Maintaining Competition

A key plank of the NPS-UD is to foster and maintain competition in both land and development markets. For example, Objective 2 of the NPS-UD seeks that:

> *"Planning decisions improve housing affordability by supporting competitive land and development markets."*

This is given effect to via Policy 1 of the NPS-UD. It requires planning decisions to contribute to well-functioning urban environments, which (amongst other things):

> *"Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets."*

At a more prescriptive level, the NPS-UD requires Tier 1 territorial authorities like AC to complete a housing and business capacity assessment (**HBA**) triennially to inform its Long-Term Plan (**LTP**), with clause 3.23 specifically requiring that:

> *"Every HBA include analysis of how the relevant local authority's planning decisions and provision of infrastructure affects the affordability and competitiveness of the local housing market."*

Notwithstanding this unambiguous policy direction, though, the FDS provides no analysis of likely effects on competition. This seems to reflect AC's apparent perspective that:

- The introduction of the concept of "well-functioning urban environment" (**WFUE**) has shifted the focus of the NPS from an economically driven policy (like its predecessor, the NPS-UDC) to one that incorporates a range of non-economic factors; and

- Although WFUE has mandatory elements, Councils can add to them. AC has added numerous non-mandatory elements to its definition of WFUE and formulated a set of assessment criteria that seem to weigh these more heavily than some of the mandatory criteria; and

- The words "limit as much as possible adverse impacts on" in Policy 1(a)(d) imply that it is anticipated that planning for other aspects of well-functioning urban environments will generate some adverse impacts on competitive land markets, which are therefore acceptable in NPS-UD terms, which helps justify its decision to curtail FUZ opportunities.

While AC is correct that it can include non-mandatory factors in its definition of WFUE, this should not be at the expense of other core purposes of the NPS-UD. To be frank, it appears that the FDS has placed undue weight on these new elements of WFUE while losing sight of economic factors (such as supporting housing affordability and enduring competitive land markets). These remain key focuses of the NPS-UD, but the FDS does not adequately capture that.

In particular, the potential downzoning of large swathes of the FUZ is a significant concern in terms of fostering and maintaining competition. Without a strong and ongoing supply of new urban land in strategically chosen locations (as per the current development strategy), the competitive operation of the region's urban land market will be compromised. Economic theory explains the potential risks of this loss competition as follows:

- **Preventing Market Power and Monopoly**: Competition prevents the concentration of market power and the emergence of monopolistic practices in land markets. If a single entity or a small group of firms dominates the market, they can exert control over prices, limit choices, and stifle competition. Competition avoids this prospect by enabling multiple buyers and sellers to interact within local land markets.

- **Consumer Choice and Affordability**: Competition enhances consumer choice and promotes affordability in land markets. When there are many developers and landowners competing for buyers or tenants, consumers have a wider range of options to choose from. This competition exerts downward pressure on prices, making land and housing more affordable for a broader segment of the population. Moreover, competition encourages developers to differentiate their offerings by providing better amenities, quality construction, and innovative designs.

- **Price Discovery**: Competition enables price discovery. When multiple buyers and sellers actively engage in a market, they compete to buy or sell on the best possible terms, thereby enabling "discovery" of the current market price (where supply and demand meet). This ensures that market prices better reflect the true value of land based on its size, location, potential uses, and other valued attributes (rather than the profit-seeking behaviour typical of monopolies).

- **Efficiency and Productivity**: Competition fosters efficiency and productivity in land markets. In competitive environments, developers and landowners strive to maximise returns by using land resources optimally. This fosters innovative land uses, such as mixed-use development, and adaptive reuse of existing structures. Competition drives developers to find creative solutions to meet the changing needs of residents, leading to improved productivity and efficient land utilisation.

- **Investment and Development**: Competition also attracts investment and spurs development in nearby areas. When developers and investors perceive a viable market, they are more likely to invest in land and undertake development projects. The prospect of earning profits

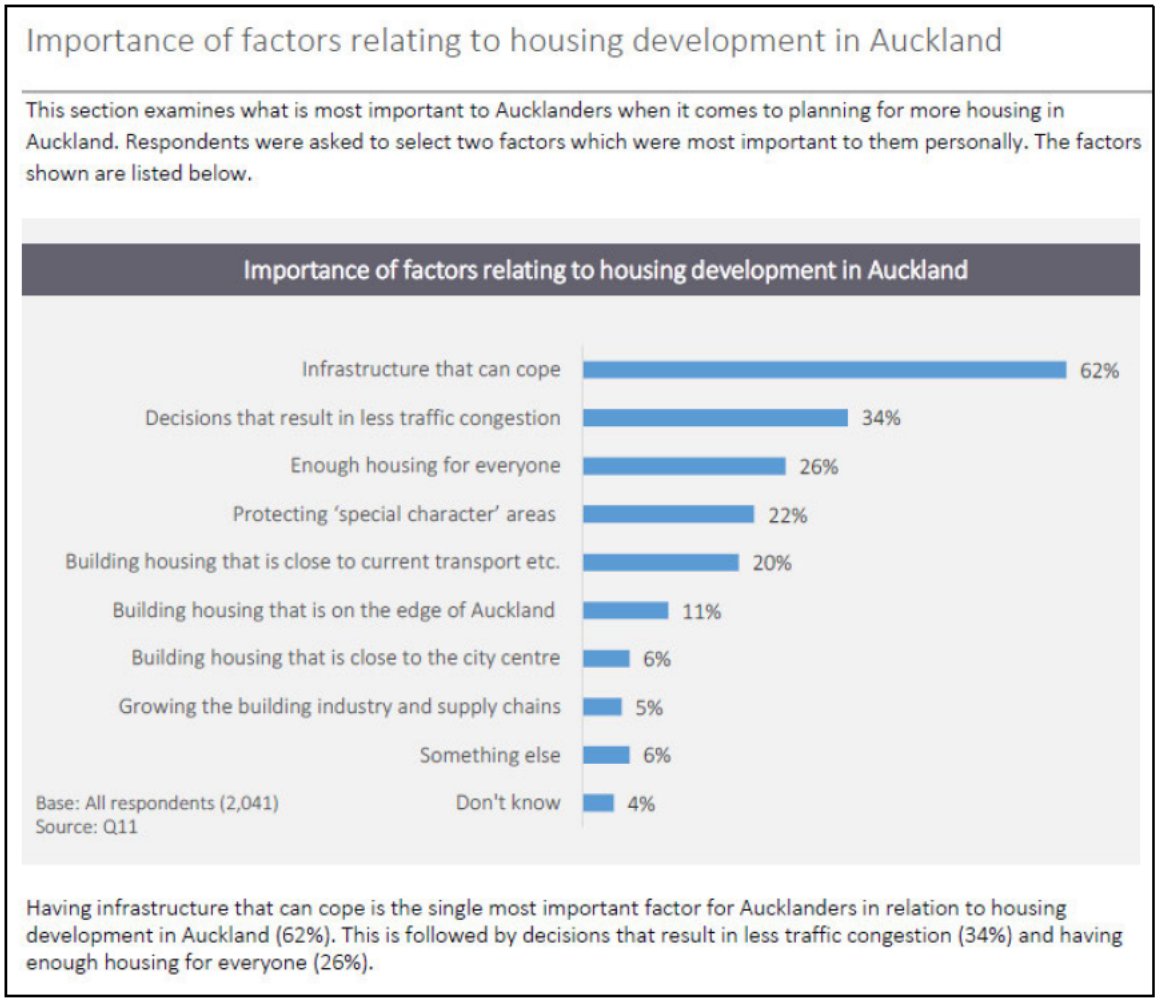
motivates developers to take risks and initiate new projects. Increased investment and development activities contribute to economic growth and job creation.

Overall, we are concerned about the FDS's potential impacts on competition. The large volumes of theoretical capacity unlocked via PC78 are not complete substitutes for competition in regional land markets. And, absent the latter, land prices will rise, flowing directly into new dwelling prices.

7.3 Providing Housing Choice & Reflecting Community Values

Finally, we note that it is critically important that the FDS promotes housing choice and reflects what's important to residents and businesses. In our view, the FDS is far too concerned with its futile pursuit of curbing GHG emissions, which does not reflect the community's preferences. See, for example, the chart below which shows the importance of various factors to the Auckland community in relation to planning for more housing.[50]

Figure 7: Importance of Various Factors Relating to Planning for More Housing in Auckland



As we can see above, "infrastructure that can cope" mattered the most to Aucklanders when surveyed (in 2021/2022) about the things that matter most in terms of planning for more housing.

[50] IPI Overall Evaluation Section 32 report, page 284

We expect that infrastructure adequacy will be an even greater concern now following the devastating effects of the anniversary weekend floods coupled with Cyclone Gabrielle. Together, these events revealed massive vulnerabilities in the three waters network and highlighted the risk of excessive intensification (i.e. creating too much impervious surface area in concentrated locations).

In our view, the FDS does not properly reflect the factors that matter most to Aucklanders in terms of new housing opportunities. This is exacerbated by a seeming over-reliance on capacity unlocked by PC78, most of which reflects intensification, and almost all of which[51] is only for one housing typology (attached). This limited range of choice is unlikely to best meet the needs of Aucklanders over time, so it is critical that the FUZ is maintained as much as possible to provide housing choice and boost competition in the region's urban land market(s).

[51] According to PC78 documentation, 96% of plan-enabled residential capacity is for terraces or apartments.

8. Deriving the FDS from the MCA

8.1 Introduction

Finally, the methodology used to translate the options analysis into the FDS' preferred scenario (i.e. its composite scenario) is unclear. Rather than selecting the best-performing option from the MCA, the FDS creates a new, hybrid option from the results that lacks any meaningful detail. This, in turn, obscures the details of the implied new strategic direction, and its rationale. This is a concern, and not just for transparency reasons, as briefly explained below.

8.2 Impacts of Negative Scores

The MCA adopted a seven-point scoring scale, ranging from -3 to 3, with negative scores reflecting bad outcomes, and positive scores good outcomes. While that's fine, the GSER makes the following critical acknowledgement about the implications of negative scores in its assessment, which is not captured in the overall narrative of the report:[52]

> *"In most cases, a negative score indicates the need for a specific policy intervention in addition to, or even instead of, land use or transport interventions alone."*

The table below shows the MCA scores, with red text indicating negative ones. Clearly, there are a lot of negative scores.

Table 6: MCA Scores (Red Values = Negative)

Criteria Themes	MCA Criteria (paraphrased)	A	B	C	D
Natural hazards & climate change	The extent of development areas in 100-year floodplains (greenfields)	-1	-1	-2	-3
	The extent of development areas in 100-year floodplains (brownfields)	-1	-3	-2	-2
Travel & Access	The extent to which scenarios impact carbon emissions	-1	-2	-2	-3
Environment	Scope to improve the health of natural wetlands (greenfields)	1	1	2	2
	Scope to improve the health of natural wetlands (brownfields)	-1	-1	-2	-2
	Impacts on ability to swim safely and collect shellfish	-1	-1	-2	-3
	Promotion of the restoration/connectivity of indigenous biodiversity	-1	-1	-1	-2
Economy	The degree to which urban development consumes highly productive soils	-1	-1	-2	-3
Social, Cultural, and Heritage	Retention of the qualities of historic heritage places and values	-2	-1	-1	0
	Likely result on levels of access to quality open space	2	1	1	-1
Travel & Access	Extent to which population is exposed to harmful air emissions	3	2	1	1
Land & Housing	Extent to which growth creates greater housing choice to meet demand	1	1	1	0
Travel & Access	Promoting mixed use communities to reduce travel distances & safety risks	2	1	1	-1
	Providing inclusive/equitable access to social infrastructure & public spaces	1	1	-1	-2
	Accessibility of social infrastructure & employment in highly deprived areas	-2	-3	-3	-3
Māori	Extent of Māori land within growth areas	1	1	1	2
	Extent to which scenarios impact on Māori cultural landscapes	-2	-1	-1	-3
Travel & Access	Accessibility of key areas of economic activity by PT + active modes	3	3	2	1
	Education is accessible by different modes (PT + Active)	3	2	1	2

[52] GSER, page 7.

Criteria Themes	MCA Criteria (paraphrased)	A	B	C	D
	Employment opportunities are aligned with areas of population growth	3	2	2	1
	Household living cost reductions from proximity to employment areas	3	2	1	1
	Rural production areas are accessible	-1	-2	-2	-2
	Travel times are reliable	-1	-2	-2	-2
Economy	Opportunities for agglomeration of similar/dependent industries	3	1	1	-1
Land & Housing	Suitable land is available for Group 1 (land extensive) industries	-2	-3	-2	-2
Infrastructure	Scenarios support current committed infrastructure	1	2	3	-2
	The scenarios result in measurable public monetary costs or losses	2	1	-1	-3
Land & Housing	Physical constraints increase the cost of development	-1	-2	-2	-3
	The market is likely to respond to the proposed land use pattern	1	1	-1	-2

In truth, more than half (56%) of all MCA scores are negative. Even the utopian scenario A scored negatively on 14 of the 29 criteria (48%). Table 7 summarises the situation by (our suggested) criteria theme. The widespread dominance of negative scores highlights the FDS' limited ability to affect meaningful change according to its own reporting.

Table 7: Share of Negative, Positive, and Neutral Scores by Theme

Criteria Themes	Negative Scores	Neutral Scores	Positive Scores
Travel impacts/accessibility	43%	0%	57%
Environment	75%	0%	25%
Land & Housing Markets	63%	6%	31%
Social, Cultural, and Heritage	50%	13%	38%
Economy	63%	0%	38%
Infrastructure	38%	0%	63%
Māori	50%	0%	50%
Natural hazards & climate adaptation	100%	0%	0%
All Themes	**56%**	**2%**	**42%**

8.3 Consideration of Infrastructure Implications

Infrastructure is a major technical and financial challenge for all Councils, especially in growing areas like Auckland. However, the GSER has only two criteria on infrastructure, which belies its vital importance in helping redefine the region's growth strategy. The scores for those two infrastructure criteria are reproduced below.

Table 8: Scenario Scores for Infrastructure Criteria

Criteria Themes	MCA Criteria (some paraphrased)	A	B	C	D
Infrastructure	Extent to which scenarios support current committed infrastructure	1	2	3	-2
	The extent to which scenarios result in measurable public monetary costs or losses over time	2	1	-1	-3

Table 8 shows that Scenario C, which is the closest match to the status quo, rightfully scored best on the first criterion because it most closely aligns with the agreed development trajectory and hence current growth-related infrastructure programme. But, Scenario C performed poorly on the second

criterion (the extent to which it could result in measurable public monetary costs or losses). Overall, the GSER concludes that:[53]

> *"More intensive compact urban forms perform better in terms of the least monetary cost of infrastructure over time, as they result in more efficient use of existing services and new infrastructure. More expansive urban forms require the greatest amount of new infrastructure with the highest costs."*

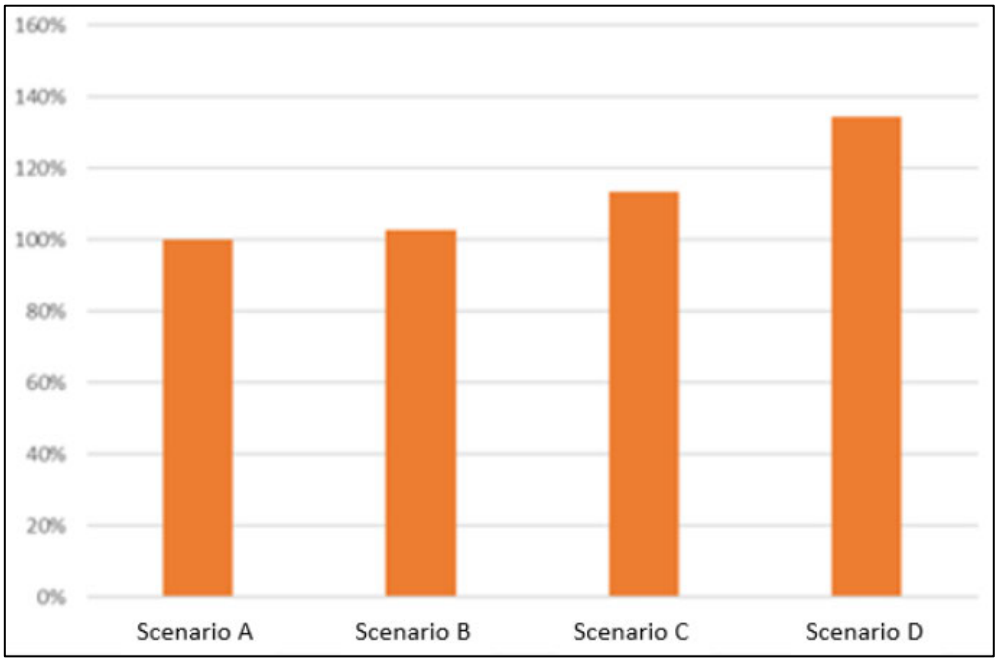
We challenge this conclusion on several grounds. First, the process used to quantify the infrastructure costs of each option are not explained. According to the GSER, infrastructure criteria were evaluated via subject matter expert input, which seems wholly inadequate given the cost and importance of infrastructure implications arising from the FDS.

Second, the cost of providing most growth-related infrastructure is recovered directly from developers via development contributions, private developer agreements, and developer self-provision. Accordingly, the reference to public monetary costs in the second criterion is misleading.

Third, the cost of (eventually) upgrading infrastructure networks in some existing urban areas could also be prohibitively expensive and/or cause unacceptable levels of disruption. This risk is particularly acute for the widespread, uncontrollable, and unpredictable growth enabled by PC78, which Scenarios A & B both rely heavily on, but the MCA scores wrongly signal otherwise.

Fourth, notwithstanding all the above, the "modelled" differences in infrastructure cost across options is much less than the scores, commentary, and conclusions suggest. This is shown in the screenshot below from page 55 of the GSER.

Figure 8: Relative Cost of Infrastructure to Service Expected Growth



[53] GSER, page 9.

To our eyes, it appears that Scenario C's infrastructure costs are only about 15% more than the far-fetched Scenario A. This is relatively immaterial in the scheme of things, with most projects having contingency buffers that far exceed the implied differential in option infrastructure costs.

Given that developers bear virtually all growth-related infrastructure costs, not ratepayers, we consider the FDS's analysis of infrastructure implications to be deficient and highly unreliable. This raises serious concerns about the validity of relying so heavily on intensification to meet the region's future business and residential needs.

8.4 Aligning New Jobs with New Homes

As already noted, the FDS places significant emphasis on travel impacts and accessibility, including the relative locations of new jobs and new homes. It assumes that more intensive development of existing urban areas is best because it lets new homes reside near existing employment areas. In forming this view, the FSDS seems to overlook the reality that many existing employment areas are almost fully built-out, with only limited scope for growth.

This again highlights the risk of relying just on plan-enabled capacity measures. While there may be enormous theoretical potential via the redevelopment of existing employment areas, this is seldom financially viable, particularly compared to residential, so it will not occur *en masse*.

In short, The FDS' presumption of significant job growth in existing urban areas is unlikely in some areas. Accordingly, new business land *will* be required in and around the FUZ to keep pace with residential growth and to address historic and existing home/job balances in the region's greenfield areas. This is also recognised in the executive summary of the GSER, which states that:[54]

> *"Providing business land opportunities in future urban areas provides opportunities to balance employment and housing."*

We agree wholeheartedly, and even the FDS notes the capability of FUZ business land to help improve employment access and bolster travel outcomes, but the proposal to undertake wholesale investigations of large parts of the FUZ (partly on travel grounds) directly contradicts it.

In our view, key decisions about the region's likely future urban form deserve a far more rigorous and reliable evaluation of options before any tweaks to the existing direction can be identified. Afterall, even the MCA itself observed the following about spatially aligning new jobs and homes: [55]

> *"Across all scenarios the model favours greenfield areas with the most job growth in [the FUZ] in Rodney and then Franklin."*

[54] GSER, page 9.

[55] GSER, page 48.

#8130

ATTACHMENT C

TRANSPORT FEEDBACK ON THE DRAFT FUTURE DEVELOPMENT STRATEGY

18 JULY 2023

FLOW TRANSPORTATION SPECIALISTS

flow
TRANSPORTATION SPECIALISTS

#8130

18 July 2023

Aidan Donnelly
General Manager, Development
Fletcher Living
Private Bag 99922
Newmarket
AUCKLAND 1149

Dear Aidan

TRANSPORT FEEDBACK ON THE AUCKLAND FUTURE DEVELOPMENT STRATEGY

Flow has been asked by Fletcher Living to provide comments on the Draft Auckland Future Development Strategy (Draft AFDS), which was recently released by Auckland Council. The Draft AFDS is proposed to replace the Future Urban Land Supply Strategy 2017 (FULSS) and the Auckland Plan 2050 Development Strategy 2018. If adopted, the AFDS will form the basis of Auckland's long term strategic planning framework.

The AFDS seeks to place some rigor on future development when considering the challenges currently faced by Council, which relates to financial challenges (funding), developing in flood prone areas, and ensuring that Government (both local and central) obtain a return on major infrastructure investments.

1 SUMMARY OF OUR ASSESSMENT

Our assessment discusses the transport concerns with the AFDS, as it relates to the following:

- The AFDS proposes to delay Future Urban Zoned land that is earmarked for employment (in particular light industry), as assessed through Structure Plans. In doing so, the AFDS will make it challenging for established/establishing residential catchments located about the fringe of Auckland to align with the outcomes sought by the Transport Emissions Reduction Pathway (TERP). This is because by delaying the outer employment areas, the AFDS
    - puts greater reliance on others (eg Auckland Transport and public transport providers) to establish and operate viable public transport networks that get people to work at the time and with the reliability that they need
    - reduces the ability to travel by cycle, scooter, and walking to access nearby employment
    - decreases the opportunities for those living in adjacent residential areas to drive shorter distances to work, therefore reducing vehicle-kilometres travelled
    - increases economic and social inequities, by making people more reliant on travelling by car if public transport cannot provide a viable alternative.

- Appendix 8 of the ADFS proposes to delay land development, aligning development when the strategic infrastructure required to service the "full build-out" of development area is "likely to be implemented". This outcome gives no certainty to when land can be developed. While the assessment of plan changes under the existing framework can be improved, development controls and developer funded upgrades that mitigate transport effects can suitably be captured in the current planning framework and reflects that development of large Plan Change areas and associated upgrades can be sequenced and occur over a number of years, if not decades.
- There is no certainty as to the timeframes of the Transport Triggers set out in Appendix 6 of the AFDS, with a number of concerns relating to the triggers suggested. These concerns along with some commentary are set out below.

2 DELAYING LAND EARMARKED FOR EMPLOYMENT

2.1 AFDS Proposal

The AFDS proposes to delay/push back the timing of Future Urban Zoned land that, through Structure Plans is earmarked for employment (light industry) development. The areas which have been delayed are located where residential growth is currently occurring at a fast rate, as allowed through approved resource consents. Large areas where employment land is proposed to be delayed are set out in Table 1.

Table 1: Revised timing of employment land

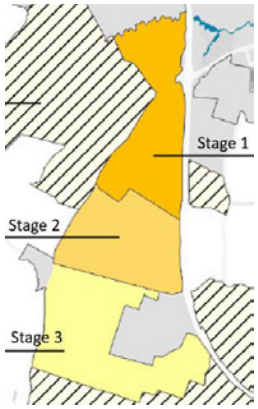
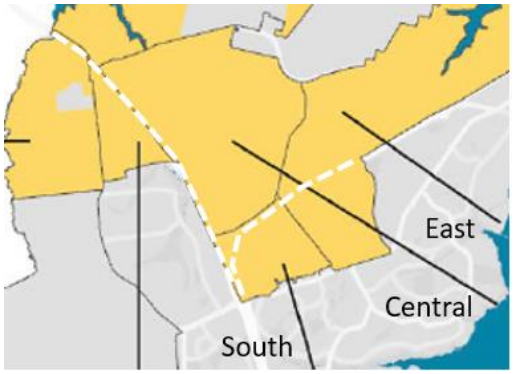
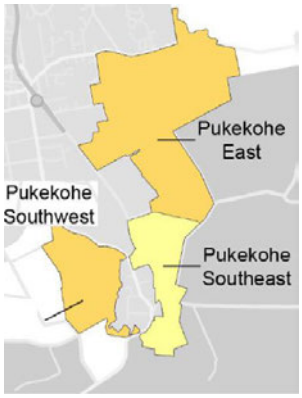
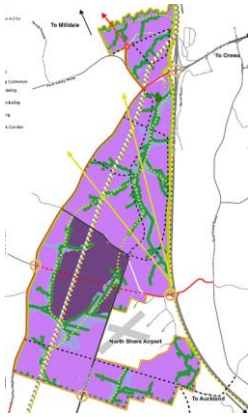
Area	Silverdale/North	Whenuapai/Northwest	Pukekohe/South
Location Map			
Structure Plan	Silverdale West Dairy Flat Industrial Area Structure Plan, April 2020	Whenuapai Structure Plan, September 2006	Pukekohe-Paerata Structure Plan 2019

Table 1: Revised timing of employment land

Area	Silverdale/North	Whenuapai/Northwest	Pukekohe/South
			
FULSS 2017 Timing	2018-2022	2018-2022 (East) 2028-2032 (Central)	2023-2027 (Pukekohe Southeast, Southwest)
AFDS Timing	2030+ (Stage 1) 2035+ (Stage 2) 2040+ (Stage 3)	2035+ 2050+ (Stg 2 North)	2035+ Pukekohe Southwest 2040+ Pukekohe Southeast
Proposed Jobs	9,000 Jobs (FULSS)	8,600 Jobs (WSP)	2,350 Jobs (PPSP)

2.2 Development of employment land

In recent history, the development of employment (light industry) land has taken 20+ years to be occupied, with recent examples including North Harbour Industrial Estate, Highbrook and The Landing at Auckland Airport. Each of these locations has relied on a suitable connection to the state highway network via an interchange, allowing the movement of road freight and vehicle-based employment related trips. Importantly, these areas have provided employment opportunities to the north, central and southern areas of Auckland. However, due to the lack of available light industrial land further afield, they are also employment hubs relied on by the wider population, with some having little or no support from suitable public transport.

The Auckland Transport Alignment Project (ATAP) report that underpins the transport investments included in the RLTP/AFDS highlights the *"significant unevenness to future employment accessibility and a growing polarisation of access to employment in the future. By 2046 more than a million people will be living in the western and southern parts of Auckland, nearly half the region's population. However these areas see relatively little improvement in their access to employment over time."*[1]

[1] https://www.transport.govt.nz/assets/Uploads/Report/ATAP-Evaluation-Report.pdf. Page 15

From a transport perspective, it is important to note that the traffic effects of a development area are not experienced from day one but are instead realised over time (20+ years). Recent development areas such as Drury South (Precinct I410) and Puhinui Precinct (I432) set out transport triggers and matters of discretion that need to be addressed to allow development to progress in an integrated manner, where effects are managed. While these frameworks can be improved, the intent of the provisions is to ensure integrated land use and transport network outcomes.

2.3 Travel behaviour

Residential growth enabled by the Metropolitan Urban Limit (MUL) and more recently, the Rural Urban Boundary (RUB) has increased population about Auckland's fringe. However, the development of employment land, and the provision of public transport networks, have not occurred at a similar pace, which in turn requires people to travel large distances to reach employment hubs.

We have assessed the travel behaviour of commuters about these outer areas (Whenuapai and Silverdale/Whangaparāoa) to better understand the destinations where people currently travel for work.

The 2018 Census commuting data (refer **Error! Reference source not found.**) shows that a large number of people commute to employment areas where light industrial activities are located, including

- North Harbour Industrial Estate
- Wairau Valley
- Penrose/Mt Wellington/Onehunga
- Henderson
- East Tamaki (Highbrook)
- Auckland Airport

The mode of travel for the majority of these trips will be by private car, as frequent and reliable public transport connectivity does not exist to all areas, noting also that many light industrial businesses include shift work which makes catching public transport less attractive due to off peak reliability and safety.

Figure 1: Commuter travel patterns (2018 Census)

North - Silverdale/Whangaparāoa	Northwest - Whenuapai/Hobsonville/Kumeu
	
Number of commuters to prominent light industrial employment areas – 3,800	Number of commuters to prominent light industrial employment areas – 2,300
Estimated annual private vehicle kilometers travelled (vkt) – 50 million	Estimated annual private vehicle kilometers travelled (vkt) – 20 million
Reduction in vkt if 15% work locally – 7 million vkt	Reduction in vkt if 15% work locally – 3 million vkt
Reduction in vkt if 30% work locally – 15 million vkt	Reduction in vkt if 30% work locally – 6 million vkt
Reduction in vkt if 45% work locally – 21 million vkt	Reduction in vkt if 45% work locally – 9 million vkt

Providing employment opportunities closer to the new residential areas established about Auckland's fringe (Whenuapai, Silverdale and Pukekohe) is a critical piece to achieving positive transport outcomes for the region, as it

- Reduces the reliance to travel across the region to access jobs, which are predominantly being accessed by private vehicle travel
- Locating employment opportunities about the residential growth areas will have a positive community effect, providing the ability to live, work and play about the same suburb, and substantially reduce vehicle kilometres travelled
- Allows more focussed public transport connections/routes to be established. Each area (Whenuapai, Silverdale and Pukekohe) has a nearby RTN station and therefore has the ability to extend or provide shorter and frequent local bus services between residential and employment areas as they develop

- Each area already has established connectivity to the state highway network, providing safe connectivity for road freight and vehicle-based employment related trips.

The AFDS ignores key accessibility challenges faced by Auckland growth areas as set out in the Auckland Transport Alignment Project Evaluation Report and does not contribute towards reducing vehicle kilometres travelled for those residential areas already established/establishing about the outer areas of the Region.

3 TRANSPORT TRIGGERS

The AFDS proposes to introduce infrastructure triggers at Appendix 6 that are required to be implemented prior to areas being development ready, with the proposed timings set out in Appendix 8.

The timing of areas being 'development ready' consider all infrastructure requirements. Our assessment has considered transport matters only, noting that other infrastructure (such as services) may be the primary purpose for the proposed delay. The number of transport triggers however is large and forms a significant obstacle in how land development can occur over time.

Transport projects listed for most part are those set out in the Regional Land Transport Plan (RLTP) which also tie back to the Auckland Transport Alignment Plan (ATAP). At Appendix 3 of the AFDS, it notes that two key transport documents are currently being finalised, being the Auckland Rapid Transit Plan (ARTP) and the Tāmaki Makaurau Integrated Transport Plan (TMTP). As such, projects and project timeframes are subject to change.

Issues with the AFDS transport triggers include

- It is proposed that Council will be stringently adhering to the infrastructure timeframes set out in the AFDS, however, the AFDS also allows timeframes to be reviewed. Using infrastructure upgrades such as Mill Road as an example, it is not reasonable to have development areas controlled by projects where funding may be redirected, be brought forward/pushed out or removed altogether, which can be based on decisions at a government political level, and therefore out of the control of Council
- The extent of several projects is significant, such as Mill Road, the North Shore Rapid Transit (extension to Milldale), North-west Rapid Transit and SH16-SH18 Connections. The AFDS does not give regard to how these upgrades may be staged, or how interim interventions put in place by the transport authorities may deliver or assist in delivering suitable short to medium term network improvements. For example,
    - a new Westgate bus station and improvements along SH16 for buses currently being implemented will improve public transport attractiveness and reliability for the North-west, such that the effect between the ultimate outcome (North-west Rapid Transit) and the interim outcome may be relatively minor (more resilient) when considering the timing of development
    - The recently completed Northern Corridor Improvements extends the Northern Busway to Albany and therefore assists with improving bus reliability for bus users to the North.

The provision of bus shoulder lanes in the future on SH1 to Silverdale, where limited interchange crossings exist would present a feasible, reliable and low cost alternative that benefits bus users, with improved frequencies for local service delivering a viable medium term solution. This approach is being applied to SH16, so would seem reasonable for SH1 North.

The above examples will help provide alternative travel options for the outer residential areas but may remain inadequate when providing attractive, efficient connectivity to key employment hubs located about the Auckland Region.

- Areas have been grouped (such as Riverhead with Kumeu and Huapai) and are therefore subject to wider area upgrades that do not necessarily impact on the safe and efficient accessibility of the area. That is, it is reasonable to tie development within Riverhead to the Brigham to Waimauku SH16 upgrade, but Riverhead should not be tied to the delivery of the Alternative State Highway (Kumeu Bypass) corridor or North-west Rapid Transit extension to Huapai which provides much needed transport improvements to the Kumeu-Huapai area, not Riverhead.
- The AFDS should not prohibit development where safe transport solutions can be addressed prior to the ultimate corridor upgrade being delivered.
- Corridor upgrades listed for areas do not only address transport (safety, active modes and capacity) but also include a significant amount of land and cost to improve stormwater improvements, for example, the Coatesville-Riverhead Highway upgrade. Long term connectivity opportunities exist for active modes when addressing corridor issues together, but cannot be achieved in isolation.
- As with current plan changes, safe, effective and efficient solutions are being delivered by private developers within the existing road reserve which address transport effects of private development. Therefore, it is unreasonable for the AFDS to tie the development of private land to transport upgrades, as private land requires third party land acquisition which only the regulatory authorities can acquire.

The logic of including strategic transport triggers to development areas which have a cost well in excess of what the Government (either locally or centrally) can progress is unreasonable. The assessment of Private Plan Changes could be improved, where development progressing prior to transport upgrades outlined in the RLTP need to demonstrate how the development will manage/control effects, such that the effects are mitigated.

The AFDS, while attempting to align the implementation of strategic transport infrastructure prior to development is not reasonable for the reasons outlined above. The current framework which includes placing land use and infrastructure upgrade triggers into planning provisions allows the opportunity for developers to progress (working with the road controlling authorities) transport upgrades which inevitably saves the roading authorities money.

4 CONCLUDING COMMENTS

An issue which exists with the delivery of transport networks, is having no easy mechanism to obtain targeted rates or contributions from land use development that can then contribute towards infrastructure that predominantly serves the area. Until a mechanism exists, the ongoing issue of ranking the region's transport priorities will always fall to where there is greater return on the investment.

Based on the current benefit framework, this is always going to direct investment where the greater demand/population exists and therefore starve investment the further out development is from the Isthmus.

The commuter travel patterns give two examples where a lot of traffic passes through Auckland. While efforts are being made to improve connectivity through active modes and public transport interventions, land use interventions also need to be part of the short to medium term solution. That is, ensuring employment opportunities exist where people live, ensuring schools (primary, secondary and tertiary), and community services such as libraries, medical centres, and hospitals exist so that cross city travel by private vehicle is minimised. We need a balanced approach to development, and land use plays a significant part of this. Rather than push certain growth areas out, we need to consider how balanced growth in areas helps achieve an efficient and feasible transport system, especially where there is currently an imbalance between residential, employment and community services in the outer areas of Auckland.

Should you wish to discuss any of the above further, please contact me on [redacted]

Yours sincerely

[redacted]