Future Development Strategy

Organisations

WRITTEN FEEDBACK
Volume 11

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

Future Development Plan 2023 #8587

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Please see attached submission

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please see attached submission

#8587

Cato Bolam
creating great places

Our Ref: 46767

31 July 2023

Auckland Council

[redacted]

Attention: The Growth & Spatial Strategy Team

Email: **futuredevelopmentstrategy@aucklandcouncil.govt.nz**

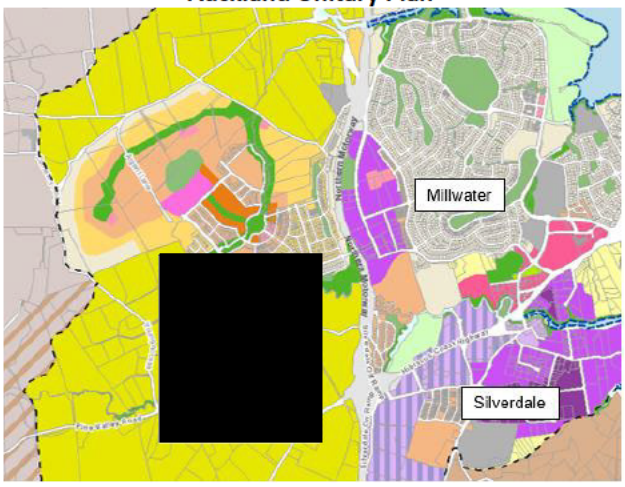
Dear Sir / Madam

SUBJECT: SUBMISSIONON DRAFT FUTURE DEVELOPMENT STRATEGY
Client: [redacted]
Location: [redacted]

1. Introduction

[redacted] is the owner of the 5.0325 ha property at [redacted] ("**Site**") , since 1990. The location is marked with a red star as shown in **Figures 1** to **3** below.

Auckland Unitary Plan



Draft Future Development Strategy, 2023

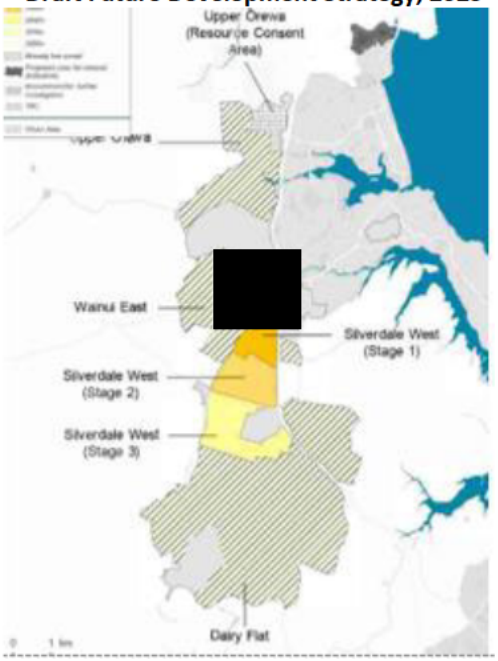
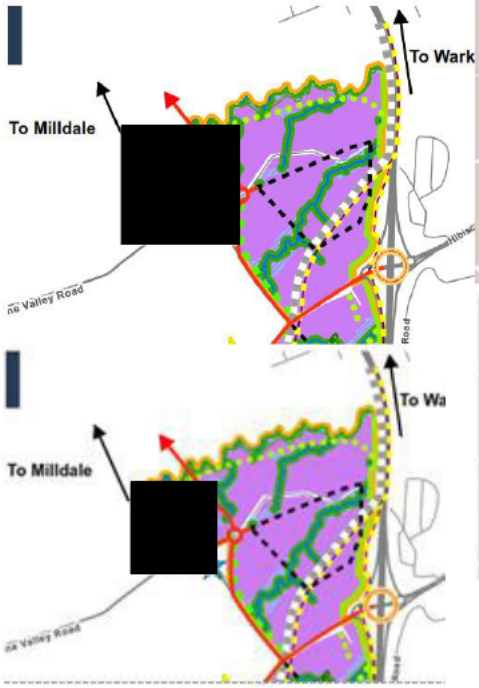


Figure 1

Silverdale Dairy Flat West Structure Plan, 2020



Draft Spatial Land Use Strategy – Dairy Flat and Silverdale Future Urban Zones, 2020

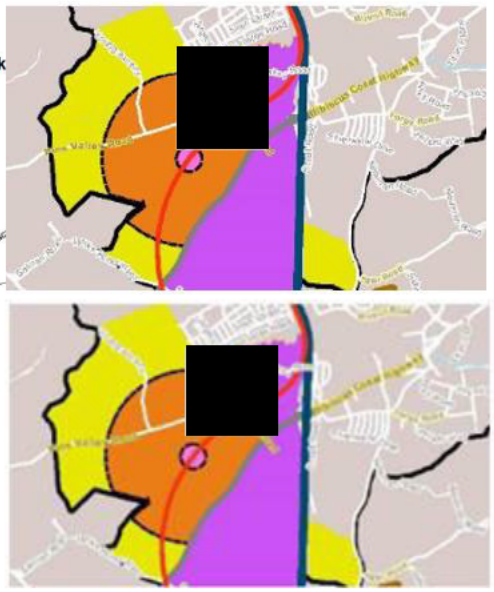


Figure 2

The Site is located on the edge of the different strategic areas/plans:

i. Silverdale West Dairy Flat Industrial Area Structure Plan, 2020:

It was uncertain whether the site located within the Structure Plan area foreshadowing a Light Industrial zoning or outside and in the Future Urban Zone ("**FUZ**").

ii. Draft Spatial Land Use Strategy – Dairy Flat and Silverdale, 2020:

It was uncertain whether the site located within the foreshadowed Terrace Housing and Apartment Zone ("**THAB**") or within the foreshadowed Light Industrial Zone.

iii. Draft Future Development Strategy ("FDS"):

It was uncertain whether the site located within the Silverdale West (Stage 1) area or within the Wainui East area.

Confirmation has been requested and received from Claire Gray, Council's Principal Advisor Growth and Spatial Strategy as quoted below:

"The sites are as follows in the various documents:

[redacted] -

- *Silverdale West Industrial Structure Plan – is within the SP area*
- *AUP - Future Urban Zone*
- *Draft Spatial Land Use Strategy - Proposed Light Industry area.*
- *Future Development Strategy - Silverdale West Stage 1.*

Preferred Strategic Transport Network North – May 2023

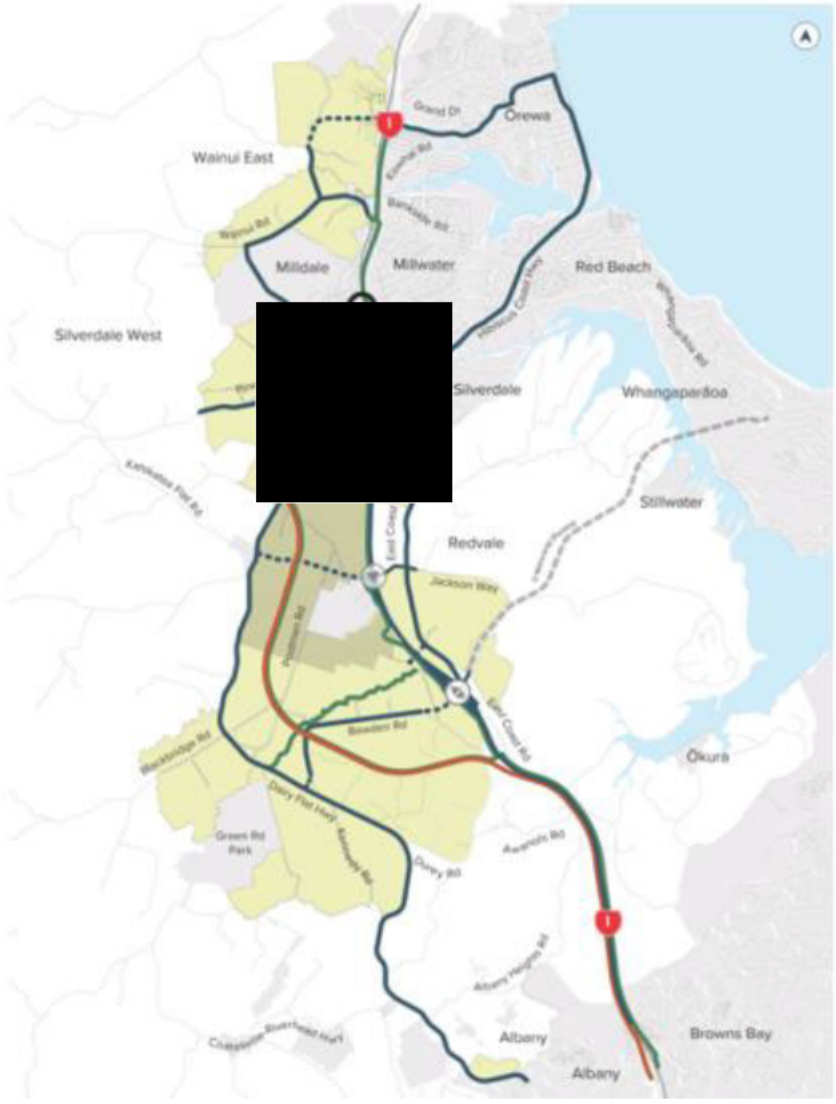


Figure 3

2. Scope of Submission

[redacted] has a specific interest in the Draft Future Development Strategy ("**FDS**") in respect to certainty on the future of the Dairy Flat/Silverdale area and its implications on property values, livelihood and asset decision-making. [redacted] submissions seeks to play a part in the outcome of the FDS and the sustainable management and efficient use and development of natural and physical resources. This submission raises particular concern about the change in signals sent by Auckland Council ("**Council**") under following plans/strategies:

- Future Urban Land Supply Strategy, 2017;
- Silverdale Dairy Flat West Structure Plan, 2020;
- Draft Spatial Land Use Strategy – Dairy Flat and Silverdale Future Urban Zones, 2022; and
- North Auckland – Strategic Transport Network, 2022.

3. Submission

[redacted] acknowledge that the preparation of a FDS is a requirement under National Policy Statement on Urban Development ("**NPS-UD**"), which requires Council to prepare a long-term strategic plan to

ensure there is sufficient development capacity and to integrate that with infrastructure planning and funding.

The submission is further detailed in **Attachment 1**.

Yours sincerely
CATO BOLAM CONSULTANTS LTD



PLANNING MANAGER

[redacted] #8587

Attachment 1

	FDS	Submission point
	Future urban areas proposed for further investigation	
1.	**Dairy Flat and Wainui East** are recommended for further investigation. Dairy Flat and Wainui East are not planned to support development before 2050+. Further investigation due to: • Infrastructure • Urban form and business land retention • Emissions/VKT reduction • Natural hazards	• Council has spent public money to develop the Draft Spatial Land Use Strategy – Dairy Flat and Silverdale Future Urban Zone, 2020 that identify future centres and business land that the transport network will support and impact. • The above-mentioned strategy has informed the Supporting Growth Alliance ("**SGA**") detailed business cases for key transport infrastructure projects and their route protections. The Preferred Strategic Transport Network North - May 2023 (refer **Figure 3** above) is a key outcome recognising the Dairy Flat and Silverdale Future Urban Zone area as a growth area. • Route protection that is supposed to guide future location choices for other essential community services is undertaken without the supporting planning of the areas they are supposed to connect. This disjoint between transport and land use planning & other infrastructure funding for housing and employment, recreational and other services cannot produce well-functioning urban environment.
	Future urban areas with proposed timing changes	
2.	**Silverdale West (Stage 1)** is recommended for a timing delay for when the infrastructure required to service the full build-out of the area is likely to be implemented, from 2018-2022 to 2030+. The following Key Infrastructure Triggers are listed: • PPC proposed mitigation • North Shore Rapid Transit (extension to Milldale) • Public Transport Services • Interchange upgrades	• Sustainable localised neighbourhoods where Aucklanders can live, and work should be enabled by Council's growth strategies. In doing so, a compact urban form is achieved on a micro scale and thus reduce vehicle kilometres travel. In support of sustainable communities and given the requirement for a FDS to also ensure capacity for business land, the Draft FDS's timing delay for Silverdale West (Stage 1), which covers the area of the Silverdale West Dairy Flat Industrial Area Structure Plan, should be reprioritised and brought forward. • Due to Cato Bolam's close involvement in the development marketplace, we are regularly approached by business and property owners (ranging from large developers to single property owners) to advise on the resource consenting feasibility and/or provide due diligence advice on establishing non-residential / non-rural business, light industrial activities in the Silverdale West (Stage 1), the same area as the Silverdale West Dairy Flat Industrial Area Structure Plan. These enquiries all state the unavailability of appropriately sized and/or located suitable land as the main reason for targeting this area. Thus, demonstrating a real need for light industrial zoned land in this area. The current FUZ creates investment risk and significantly limits the feasibility and/or longevity of these business activities. Currently, several storage facility, motorhome storage, shipping container storage facility, caravan storage facilities have already established in the area but are limited in scale and or permanence due to resource consent imposed conditions as a result of the FUZ provisions.

	FDS	Submission point
		• Council has spent public money to develop the Silverdale West Dairy Flat Industrial Area to support council-initiated plan changes to provide urban zones and guide the provision of key infrastructure. The development of a structure plan also sends promising signals of live zoning in the medium term to affected property owner and the development community, impacting on their decision-making. However, the Draft FDS creates uncertainty on the future of this Structure Plan area. • Council has also spent public money to develop the Draft Spatial Land Use Strategy – Dairy Flat and Silverdale Future Urban Zone, 2020 that identify future centres and business land that the transport network will support and impact. This strategy has informed the Supporting Growth Alliance ("**SGA**") detailed business cases for key transport infrastructure projects and their route protections. The Preferred Strategic Transport Network North - May 2023 (refer **Figure 3** above) is a key outcome recognising the Dairy Flat and Silverdale Future Urban Zone area as a growth area. • The SGA has also communicated with [redacted] (and other affected land owners) about route protection for transport connection that will be required over the next 10 to 30 years. While route protection provides property owners, business and the community with certainty on where transport routes will be in the future, these current initiatives by the SGA, also seem to contradict the Draft FDS priorities. This sends mixed signals to property owners and developers and further impacts on property values, which creates uncertainty and instability in the Auckland property market and housing supply. • Route protection that is supposed to guide future location choices for other essential community services is undertaken without the supporting planning of the areas they are supposed to connect. This disjoint between transport and land use planning & other infrastructure funding for housing and employment, recreational and other services cannot produce well-functioning urban environment. • The Draft FDS also proposes to delay urban development in Silverdale West (Stage 1) until critical infrastructure can be provided. However, the approach seems counterintuitive as bulk infrastructure will not be planned and provided unless there is concrete certainty on the timing of greenfield development and if that timing is in the near to medium future.

	FDS	Submission point
	Constraints on Development	
3.	**Natural Hazards, Natural Environment, Natural Heritage, Cultural Heritage**	• Greenfield developments can be planned (via the Auckland Unitary Plan structure plan process) and designed (via the plan change and resource consenting processes) to mitigate flooding and other natural hazards. This is much simpler and more cost effective than addressing natural hazards in existing urban areas. New urban neighbourhoods (e.g. Millwater/Milldale) were not significantly adversely affected by the recent floods due to good design and engineering that avoided/mitigated natural hazards resulting in resilient built systems, natural environment and communities.
4.	**Land Use Capability**	• Removing or delaying greenfield land (i.e. change the FUZ zoning to a non-urban zone) will cause the National Policy Statement on Highly Productive Land ("NPS-HPL") to come into play. The NPS-HPL will apply to all land with highly productive soils that are not identified in a published FDS for urban development within 10 years. Accordingly, where the Draft FDS changes live zoning timelines of FUZ land beyond 2033, the NPS-HPL may be said to apply and stop urban and rural lifestyle development. Some of the exceptions provided for in the NPS-HPL is where: o Council identifies that highly productive land is required to provide sufficient development capacity to meet the demand for housing or business land to give effect to the NPS-UD; or o The highly productive land is subject to identified permanent or long-term constraints. o The implications of the NPS-HPL could thus result in FUZ land that are delayed in the Draft FDS beyond 2023 becoming unavailable for future live urban zoning. This has consequences on the adequate supply of residential land to meet the demand. It also creates further uncertainty to property owners and developers and could create turmoil in the property market.
	Development Capacity	
5.	Council estimates the current plan enabled dwelling capacity to be over 2,3 million because it includes Intensification Plan Change 78 ("**PC 78**") areas with all Qualifying Matters applied.	• PC 78 is still in the plan change process and given the extension granted by the Government can only be realised in 2025. In addition, whether the current legislation survives until 2025 may be dependent on the outcome of the 2023 national election, given the recent announcements by the National Party. • This submission raises particular concern about what we consider to be an over-emphasis on brownfields development at the expense of the more balanced approach including greenfield development that currently exists. In brief, we consider the draft FDS goes too far in drawing back on the scale and timing of greenfields development opportunities. It is critical that the Council get this right and make science-based decisions on how and when Auckland should grow.

	FDS	Submission point
		• Despite the large number of building consents issued, the building industry are unable to deliver on the ground. This is because from 2009 to 2020, home building did not keep pace with New Zealand's fast-rising population, resulting in a significant shortfall of houses in Auckland. According to NZ Institute of Economic Research: "Before the COVID-19 pandemic, strong migration-led population growth boosted demand in New Zealand, including for housing. With housing construction slow to respond, the limited supply of new housing moving onto the market exacerbated the housing shortage." The backlog was further sustained by the construction delays caused by COVID-19. • The Draft FDS proposes to focus most growth in existing urban areas because it supports quality compact urban form. That general principle is supported. This submission does not oppose quality compact urban form – only an over-emphasis on it in brownfields areas. Quality compact urban form can, and indeed should, be also achieved in greenfields development. • Focussing most of the growth in existing urban areas will also result in competition for land and thus impact on land prices and ultimately further worsen Auckland's housing affordability. • We consider that the existing housing shortage, the building industry's lack of capacity and market instability coupled with the uncertainty created by the significant change in direction, as proposed by Draft FDS, will further slowdown housing delivery. The lack in supply will thus further increase the backlog and exacerbate house price unaffordability. • To avoid these unintentional consequences, a more balanced approach is required to planning for Auckland's growth by providing for sufficient growth in both brownfield and greenfield areas.

Future Development Plan 2023 #8588

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Your feedback

Focusing growth

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

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

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

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

Tell us why

The above assumptions are not based on factual evidence. Evidence indicates that greenfield land is less costly to develop and can be more efficient in terms of responding to the effects of climate change; providing for a well-functioning urban environment; delivering the required infrastructure and providing choices for where and how people live and work. The FDS should strike a balance between provided for urban consolida on and greenfield development to contribute to business land, housing supply, affordability and choice.
Given the existing infrastructure and community facilities it is an efficient and compact outcome to retain the Warkworth Central area (inclusive of 14 Mason Heights) as Future Urban to be development ready in 2028 - 2032. This timing will align with the Unitary Plan review process, will provide the required degree of certainty to landowners and will facilitate opportunities for land development to deliver land for housing as required to respond to growth demands in Warkworth. The proximity of the land to nearby services, centres and education facilities will assist in reducing vehicle movements to and from Warkworth.

Accessible local centres

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

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

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

Tell us why

As set out above, the land is in close proximity to infrastructure, a future local centre, the Town Centre, schools and other education facilities and employment options. It also provides the clearest opportunity to develop local employment opportunities in Warkworth.

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

Avoiding hazards

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

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

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

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

Tell us why

Significant hazard risks do need to be defined and responded to. Flooding has been and will continue to be an issue for land development. The recent flood events do bring the issue to the forefront of mind. However, there are many good examples of where flood hazards can be effectively managed. The presence of a risk should not render land unsuitable for development. Greenfield Development often responds better, and the response is more efficient, in terms of managing potential hazards. The existing policy and legal framework require hazard risk to be fully assessed through any proposed plan change process.

The removal of future urban areas due to the presence of a potential flood risk does not allow for land developers to put forward a sustainable urban development option that is fit for purpose for the site or area in question.
The identification of the need for further investigation and removal of the future urban land for this reason limits the ability to provide for all types of housing and commercial spaces to meet the demands of Auckland growing population.

Resilient infrastructure

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

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

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

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

Tell us why

The provision of nature-based infrastructure can be better achieved via greenfield development in which infrastructure provision can be more efficient and responsive to the impacts of climate than in brownfields or infill development where there are often limitations on the ability to efficiently upgrade infrastructure in this way.

Other feedback

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

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

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

Ellper Holdings Limited seek that the FDS maps be amended to retain the Warkworth Central area as Future Urban, including the land at 14 Mason Heights, and that the timing for urbanisation of this area aligns within the timing in the FULSS, namely 2028 - 2032.

Ellper Holdings Limited also seek that the FDS maps be amended to show their land at 14 Mason Heights as a “Resource Consent Area” given that the subdivision consent approval is imminent and will likely occur prior to the FDS being finalised.

Ellper Holdings Limited wish to be heard in support of their submission and request hearings be held to facilitate this outcome.

31 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

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

Submitter Details

This feedback is provided on behalf of:	Ellper Holdings Limited
Property or Interest Affected by the FDS:	[redacted]

Address for Service

Name:	The Planning Collective Attention: Burnette O'Connor
Email Address:	Burnette@thepc.co.nz
Phone:	[redacted]

Property Details

The submitter owns the land at 14 Mason Heights, Warkworth. The property is legally described as Lot [redacted] and comprises of 9,623m^2. A dwelling is located within the south-eastern corner of the site which is accessed via a formed vehicle crossing to Mason Heights. An aerial image is provided in Figure 1 overleaf.



Figure1 – Map showing location of 14 Mason Heights, Warkworth (Auckland Council GeoMaps, 25/07/23)

The site is situated within the Future Urban Zone under the Auckland Unitary Plan - Operative in Part ("AUP-OP") as shown in Figure 2 below. The land immediately north and east of the site is zoned Residential - Single House. This land is proposed to be rezoned to Residential - Mixed Housing Urban through Auckland Council's Intensification Plan Change 78 ("PC78").

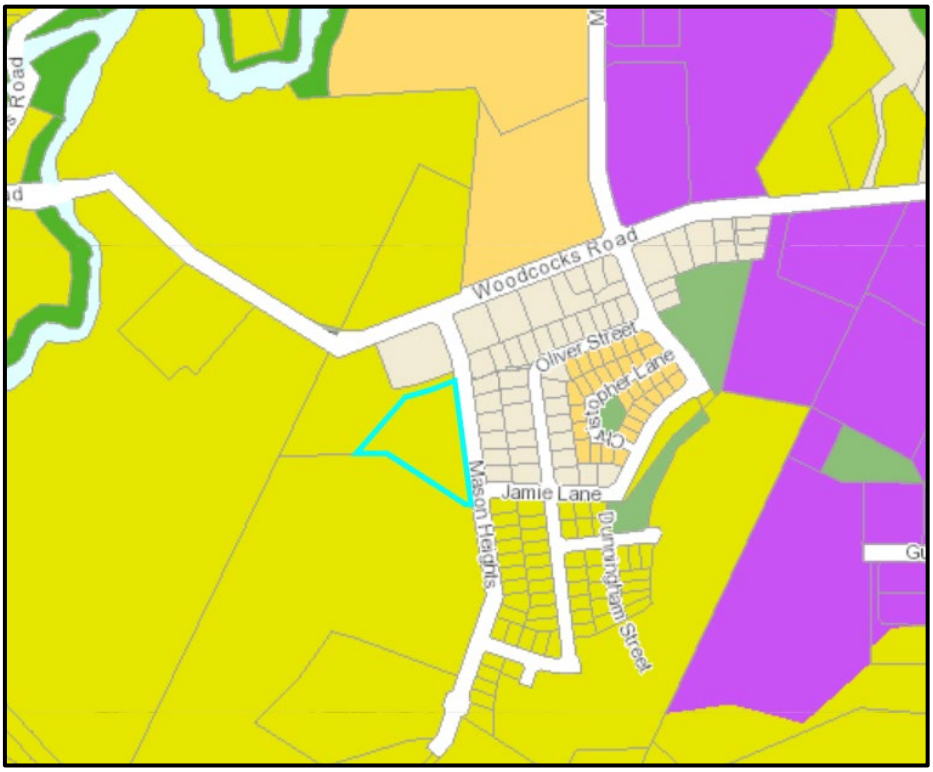


Figure 2 – Map showing zoning of 14 Mason Heights, Warkworth (Auckland Unitary Plan Maps, 25/07/23)

Figure 3 below shows the location of the site in the context of the existing and future urban areas within Warkworth.

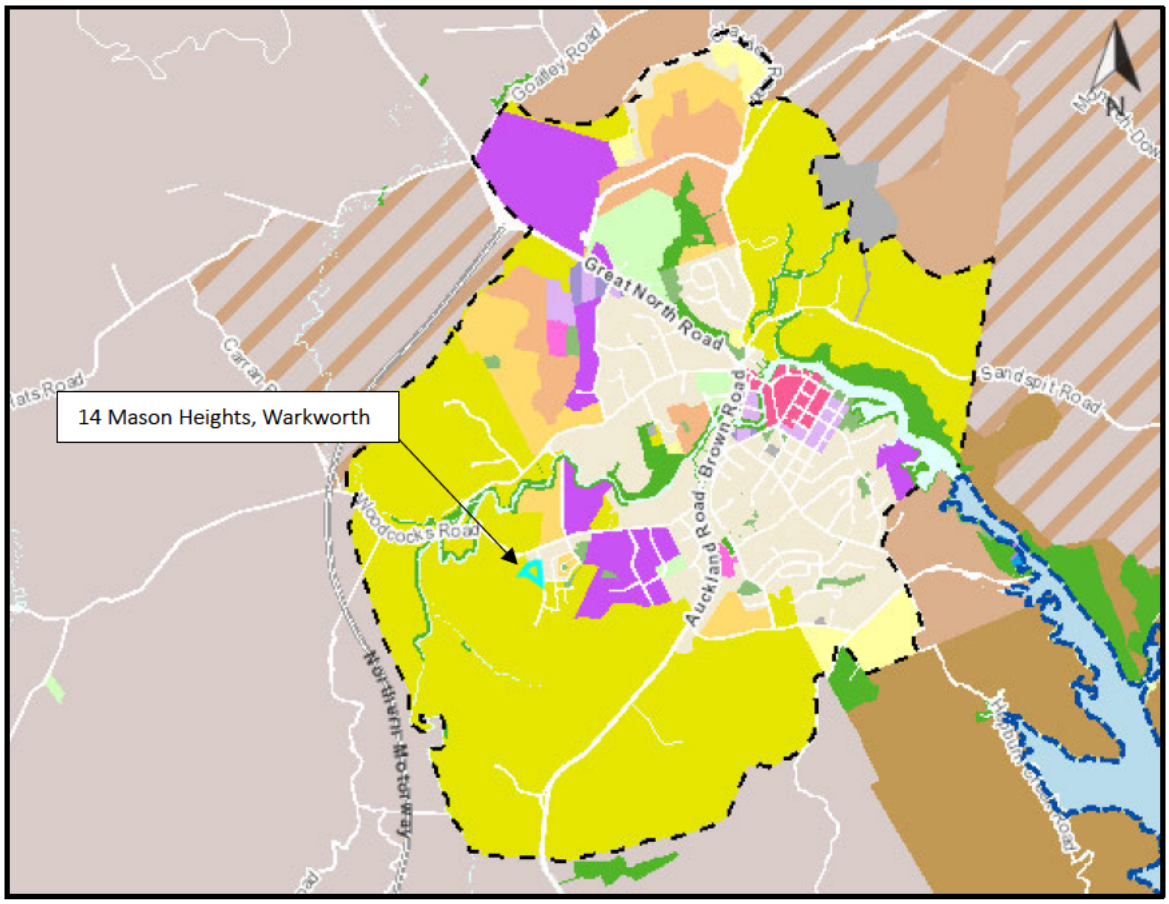


Figure 3 – Map showing location of 14 Mason Heights, Warkworth (Auckland Council Unitary Plan Maps, 25/07/23)

The Future Urban Land Supply Strategy 2017 (**"FULSS"**) identified the site as being within the Warkworth South future urban area. Warkworth South was identified as being 'development ready' between 2028 - 2032.

The Warkworth Structure Plan (**"WSP"**) identifies the future zoning of the land as a mix of Residential - Mixed Housing Urban and Residential - Mixed Housing Suburban. Given the direction of PC78, it is anticipated that the urban zoning of the land would be Residential - Mixed Housing Urban.

Auckland Council are currently processing a bundled land use and subdivision consent to subdivide the land at [redacted] into 18 residential lots and two joint owned access lots (bundled consent reference: BUN60402195)- refer to Figure 4 below for a copy of the lodged scheme plan. The land use component involves works associated with the subdivision and to enable the development and use of the residential sites prior to the live zoning of the land. The applicant and their team are working to close out stormwater matters at the moment and the consent should be issued in the next couple of weeks.

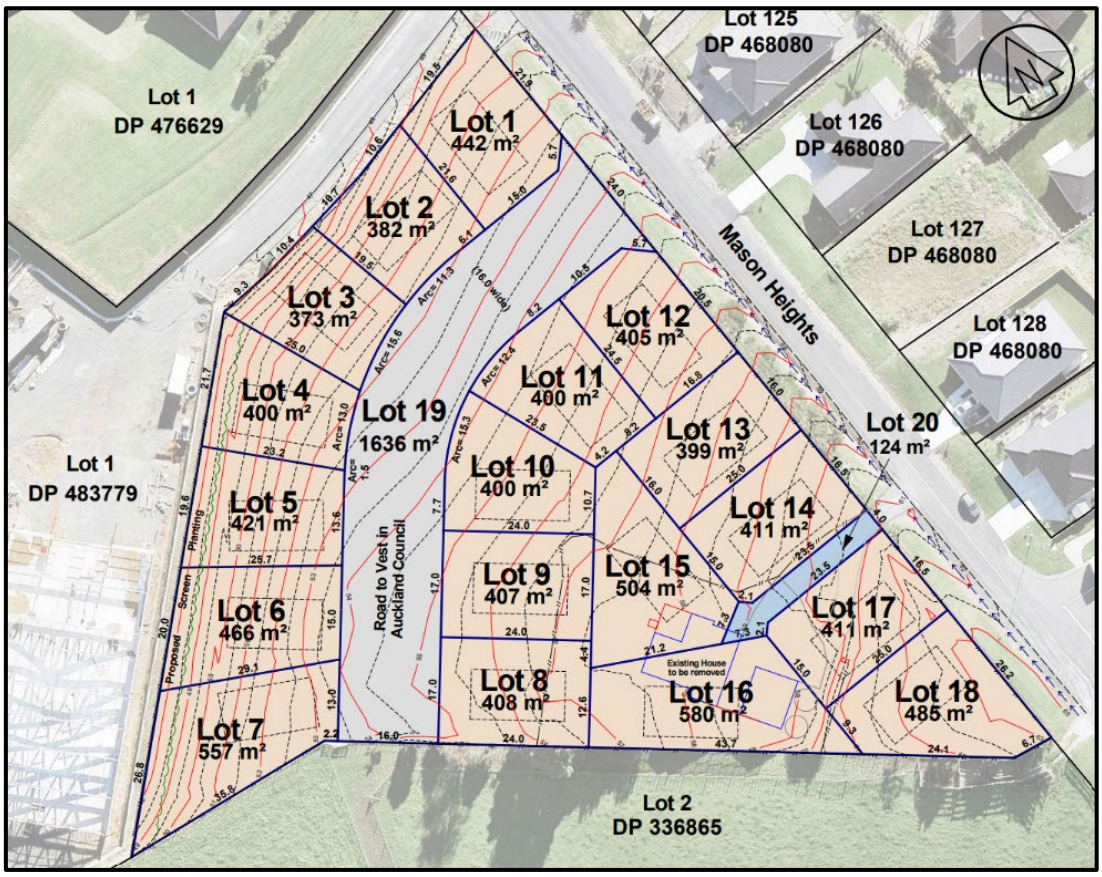


Figure 4 - Proposed Scheme Plan

In terms of the surrounding environment, the immediately adjoining site at [redacted] (zoned Future Urban) is developed, containing a church and car parking facilities. The land on the eastern side of Mason Heights is zoned Residential -Single House under the AUP-OP and is developed, largely containing a single dwelling per site. The site sizes range between 420m^2- 600m^2. The Future Urban zoned land to the south-east has been consented for residential development prior to live-zoning of the land and construction of the development is underway. The wider area includes land zoned Residential - Mixed Housing Urban, Residential- Single Housing and Business- Light Industry.

The wider surrounding locality includes a mix of activities including, but not limited to, Summerset Falls retirement village; Warkworth Toyota; Mitre 10 Mega, and a childcare centre which are located to the north-east of the subject site on Mansel Drive and Woodcocks Road. Mahurangi River is located north of the subject site.

Generic Feedback

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

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:

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

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

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

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

(2) Every FDS must spatially identify:

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

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

(c) any constraints on development.

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

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

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

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

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

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

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

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

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

(e) support reductions in greenhouse gas emissions; and

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

Clause 3.14 states the FDS must be informed by:

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

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

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

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

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

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

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

Consultation and Engagement:

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

Furthermore, Clause 3.16 (2) requires that for a review of the FDS, the review must also include engagement with the development sector and landowners.

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

> *(a) to enable democratic local decision-making and action by, and on behalf of, communities; and*
> *(b) to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future.*[1]

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

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

Site Specific Feedback

The FDS identifies [redacted] as being within the 'Warkworth Central' future urban area and proposes to delay the timing for urbanisation of the area from 2028-2032 (as identified in the FULSS) to 2040+.

The FDS recommends that the Warkworth Central future urban area should be subject to further investigation to determine whether or not this area should be retained for future urban development. The reasoning is:

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

Infrastructure

- Transport infrastructure is not planned to support development before 2040+. There is no rapid transit network planned so this area would not contribute to VKT reduction. Distance from the existing urban area, lack of rapid transit and lower opportunities for mode shift mean strategic outcomes are unlikely to be achieved.

Urban form

- Further consideration is needed to understand the role of Warkworth as a rural node and impact any changes might have on its sub-regional function.
- Business land provision is crucial to how Warkworth will develop. Further assessment is needed to understand the impact any changes might have on business land capacity.

Emissions/VKT reduction

- Potential for higher vehicle kilometres travelled (VKT) and CO2 emissions than other FUAs due to Warkworth being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs.

Natural hazards

- Warkworth North-East has moderate hazard constraints, including approximately 8% of the FUA within the 1% AEP floodplain, and a small section at the southern end of the FUA bordering the Mahurangi river that is at risk of coastal inundation. There is a moderate proportion of the FUA subject to high-risk slope instability.
- Warkworth South has moderate hazard constraints, including approximately 25% of the FUA within the 1% AEP flood plain, and small to moderate areas of the FUA containing some risks of settlement, liquefaction and slope instability.

This submission demonstrates that these reasons are insufficient and flawed for the Future Urban land at Warkworth Central, and specifically for the submitters land, for the following reasons:

<u>Infrastructure</u>

- The expert assessments undertaken demonstrate that there are no transportation constraints to the urban development and use of the land. The land presently has access to Mason Heights, which provides access to the Town Centre, education facilities, services and employment areas. The future residential lots will have access to Mason Heights via joint owned access lots. There are no transportation constraints which inhibit the residential use or development of the land.

- Supporting Growth have recently lodged Notice of Requirements on behalf of Auckland Transport and Waka Kotahi to protect the future transport network for Warkworth. Parts of the required network in the southern area of Warkworth do not form part of the Notices of Requirements as there was comfort that these transport corridors would be provided by the Waimanawa – Warkworth South Plan Change that has recently been lodged with Auckland Council.

- Expert assessments provided with the bundled land use and subdivision consent application for 14 Mason Heights adequately demonstrate that there is adequate servicing capacity to facilitate the urban development and use of the land. There are no infrastructure constraints that warrant removing the Future Urban zoning of the land.

- The Snells Beach Wastewater plant has been designed to service all future urban land in Warkworth so there is wastewater infrastructure in place.

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

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

Urban Form

- Significant work has been undertaken by the Auckland Council and Warkworth Community to plan for much needed growth within Warkworth. The FDS undermines the community vision and undervalues the importance that providing housing choice has to creating a quality and well-functioning urban environment.

- It is anticipated that the land will be developed for residential purposes in the imminent future. The combined land use and subdivision consent application demonstrates that the urban development of the subject land can be undertaken in a manner that positively contributes to creating a quality urban environment and delivery of much needed housing supply.

- The land can directly access Mason Heights and there are existing pedestrian routes along the eastern side of Mason Heights and surrounding area to facilitate alternate means of transport. The land and surrounding future urban area are also located within close proximity to existing educational facilities, services, the town centre, and future local centre as identified in the WSP. The future urban land is within a prime location to deliver a small amount of affordable and quality housing for Warkworth.

Emissions/VKT reduction

- For the reasons stated above, the land and associated future urban area is suitable for development. The land and future urban area will provide local employment opportunities and housing supply to enable a reduction in VKT, notably the creation of a new local centre to cater for future residential land. There is also reasonably direct access to the town centre and is close to services and education establishments including early childhood/learning centres, Mahurangi College and the tertiary opportunities provided through Manukau Institute of Technology campus facilities in Woodcocks Road.

- The future planned upgrades to Woodcocks Road incorporate walking and cycling facilities which will further assist with providing people with more transport options to assist with reducing vehicle kilometres travelled.

Natural Hazards

- The land and area are not constrained by environmental hazards – there is no significant natural hazard risk.

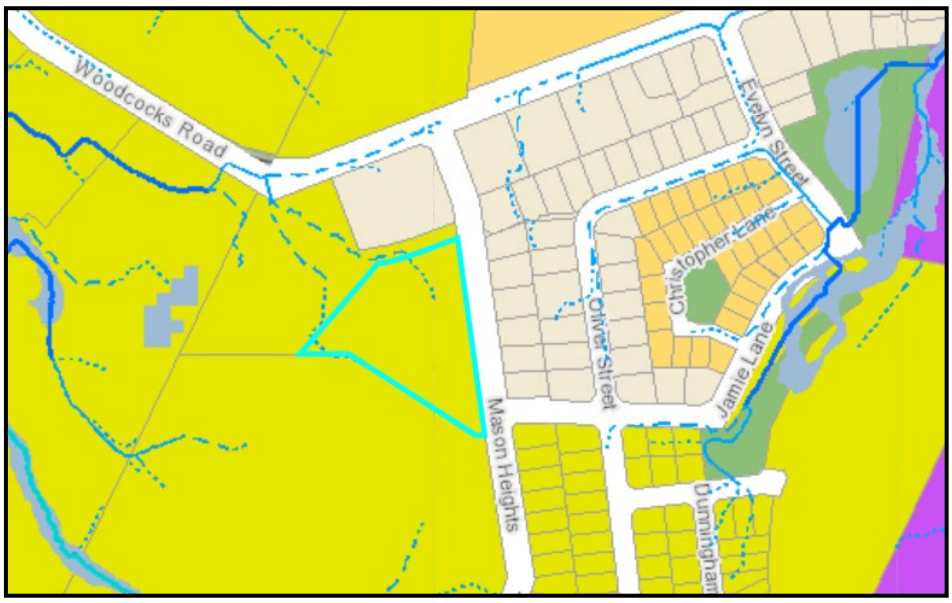


Figure 4 - AUP-OP Maps showing overland flowpaths, watercourses and floodplain overlaid (source: AUP-OP Maps, July 2023)

- It is not appropriate for Auckland Council to consider removing future urban land due to the land being subject to natural hazards. The recent flood events highlight the need to plan for natural hazards, however there are many good examples of where flood hazards can be effectively managed. The presence of a risk should not render future urban land unsuitable for development.

- A structure planning and plan change process is a more appropriate pathway to assess the options and detail associated with issues such as natural hazards. It is at this stage that a location-specific assessment of natural hazard risk can be undertaken and tested via the structure planning or private plan change process, and the most appropriate use of the land can be determined.

- Greenfield developments, which are carefully master planned, can equally respond to climate change and hazards. Good development done well does not lead to flooding and natural hazard risk. Land constrained by natural hazards can still serve a function, for example riparian planting or landscaping areas along rivers and streams contribute to ecological or landscape values and open spaces can have a dual function of use for stormwater detention during weather events.

In addition to the above, the submitter considers that the following arguments made by Auckland Council in the FDS are fundamentally flawed:

- The FDS seeks to limit the use of private plan changes as a mechanism for rezoning Future Urban areas on the basis that the private plan changes have severely undermined the sequenced approach provided for through the FULSS. Section 4.2.2(1) of the FDS outlines that:

> *Future urban areas have come under increasing development pressure. Rather than the sequenced approach provided for through the FULSS, live zoning has come through private plan changes ahead of time. Up until the end of March 2023 10 private plan changes were fully operative in the future urban area. A number of other private plan changes are being processed with more expected. In effect, private plan changes are*

driving the strategy. This has removed any degree of certainty in sequencing and timing of growth and has forced the council group to become more reactive to ever changing priorities – both in the timing of development and the number and spread of areas being live zoned.

Private plan changes are fundamental to achieving the development of greenfield land. The FDS states that approximately 33% of the identified future urban land has now been live zoned and is being developed (as at the end of March 2023) - this has been solely achieved through private plan changes, noting that the only plan change initiated by Auckland Council - Plan Change 5: Whenuapai Plan Change was withdrawn.

The provision for infrastructure is a key consideration when Council is assessing private plan changes and therefore delaying or removing the future urban areas will not solve the issue of out of sequence urban development of land.

- It is vital to obtain input from the private sector, such as developers and landowners, to formulate a growth outcome that is cost-efficient to Council and delivers quality urban outcomes. The FDS in its current form does not achieve this.

- The FDS relies on redeveloping brownfield areas to deliver a majority of the housing and business capacity because it claims that this is the most cost-effective from an infrastructure perspective. This is not necessarily, uniformly correct. Often greenfield land is less costly to develop and can be more effective in terms of new provision for infrastructure that is more responsive to natural hazards and climate change, provides for a well-functioning urban environment and delivers choices for where and how people live and work.

- The FDS is inconsistent in its approach to investigating or potentially removing future urban land due to emissions/VKT reduction. The future urban areas within Warkworth are recommended for further investigation due to this reasoning, however the FDS outlines that the future urban areas within Clarks Beach and Glenbrook are to proceed with urbanisation in 2030+. If the FDS applied a consistent approach, these future urban areas would be recommended for further investigation or removal due to emissions/VKT reduction given the isolated nature of these two settlements and reliance on private vehicles to travel to nearby areas such as Drury and Pukekohe for employment and services.

Specific Feedback in Response to Have Your Say

Focusing Growth:

Focusing growth

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

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

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

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

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

Given the existing infrastructure and community facilities it is an efficient and compact outcome to retain the Warkworth Central area (inclusive of 14 Mason Heights) as Future Urban to be development ready in 2028 - 2032. This timing will align with the Unitary Plan review process, will provide the required degree of certainty to landowners and will facilitate opportunities for land development to deliver land for housing as required to respond to growth demands in Warkworth. The proximity of the land to nearby services, centres and education facilities will assist in reducing vehicle movements to and from Warkworth.

Accessible Local Centres:

Accessible local centres

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

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

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

As set out above, the land is in close proximity to infrastructure, a future local centre, the Town Centre, schools and other education facilities and employment options. It also provides the clearest opportunity to develop local employment opportunities in Warkworth.

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

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

Avoiding Hazards:

Avoiding hazards

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

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

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

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

Significant hazard risks do need to be defined and responded to. Flooding has been and will continue to be an issue for land development. The recent flood events do bring the issue to the forefront of mind. However, there are many good examples of where flood hazards can be effectively managed. The presence of a risk should not render land unsuitable for development. Greenfield Development often responds better, and the response is more efficient, in terms of managing potential hazards. The existing policy and legal framework require hazard risk to be fully assessed through any proposed plan change process.

The removal of future urban areas due to the presence of a potential flood risk does not allow for land developers to put forward a sustainable urban development option that is fit for purpose for the site or area in question.

The identification of the need for further investigation and removal of the future urban land for this reason limits the ability to provide for all types of housing and commercial spaces to meet the demands of Auckland growing population.

Resilient Infrastructure:

Resilient infrastructure

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

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

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

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

The provision of nature-based infrastructure can be better achieved via greenfield development in which infrastructure provision can be more efficient and responsive to the impacts of climate than in brownfields or infill development where there are often limitations on the ability to efficiently upgrade infrastructure in this way.

Conclusions and Outcomes Sought

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

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

Ellper Holdings Limited seek that the FDS maps be amended to retain the Warkworth Central area as Future Urban, including the land at [redacted], and that the timing for urbanisation of this area aligns within the timing in the FULSS, namely 2028 - 2032.

Ellper Holdings Limited also seek that the FDS maps be amended to show their land at [redacted] as a "Resource Consent Area" given that the subdivision consent approval is imminent and will likely occur prior to the FDS being finalised.

Ellper Holdings Limited wish to be heard in support of their submission and request hearings be held to facilitate this outcome.

Yours sincerely

[redacted]

End of Report

Future Development Plan 2023 #8589

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Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

31 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

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

Submitter Details

This feedback is provided on behalf of: [redacted]

Property or Interest Affected by the FDS: [redacted]

Address for Service

Name: The Planning Collective
Attention: Burnette O'Connor

Email Address: Burnette@thepc.co.nz

Phone: [redacted]

Property Details

The submitter has a particular interest in the land at 10 Mason Heights, Warkworth, legally described as Lot [redacted]. The site is zoned Future Urban and is 1.18ha in area. The site is located on the western fringe of residential and industrial development along Woodcocks Road. The land along the eastern side of Mason Heights has been further subdivided for residential purposes. The site is essentially the Future Urban frontier for Warkworth West.

The site is owned by the Mason Heights Gospel Hall Trust and has operated as a place of worship for over ten years, as R55961 to construct and establish a church meeting hall and associated car-parking

was approved in July 2010. The church is approved to hold general congregations with up to 200 persons in attendance on weekday evenings, specific morning hours on a Sunday and specific morning hours on alternate Saturdays. Three days per calendar year, the church is approved to hold special events catering for up to 644 persons.

On 17 May 2023, The Planning Collective lodged a Section 127 application (LUC60002326-A) to change the conditions of R55961 to increase the general congregation numbers to 400 outside weekday commuter peak hours, increase the special event congregation number to 950 and remove most existing restrictions pertaining to congregation times. This application is currently processing with Auckland Council.



Figure 1: Aerial image of subject site (Source: Auckland Council GeoMaps)

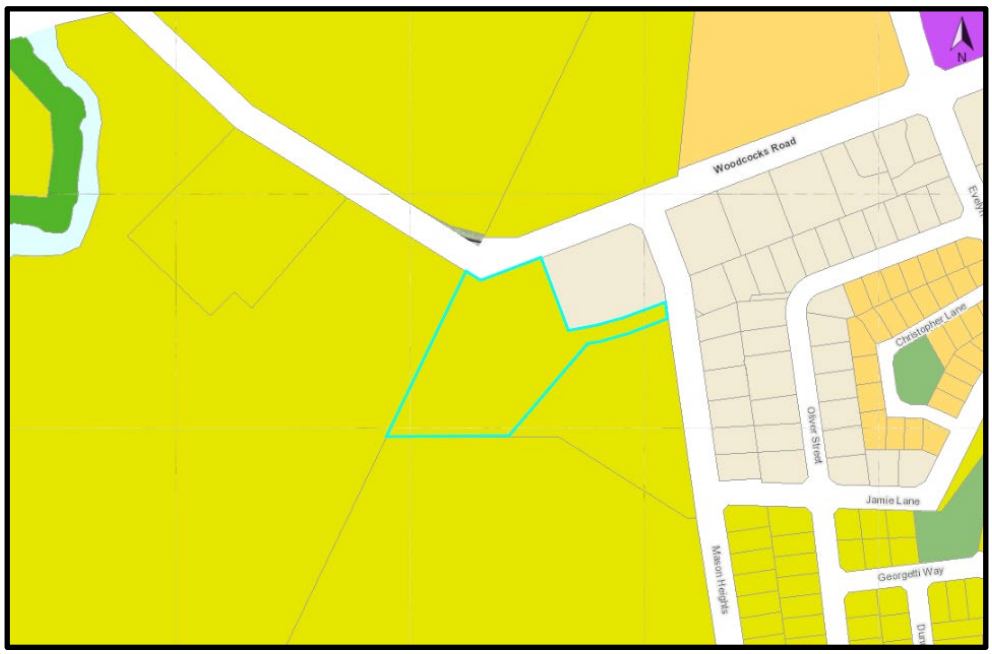


Figure 2: Zoning of subject site (Source: AUP-OP Maps)

Generic Feedback

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

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

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:

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

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

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

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

(2) Every FDS must spatially identify:

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

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

(c) any constraints on development.

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

Clause 3.14 states the FDS must be informed by:

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

(b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS

(c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans

(d) Māori, and in particular tangata whenua, values and aspirations for urban development

(e) feedback received through the consultation and engagement required by clause 3.15
(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement
(g) any other relevant national policy required by, or issued under, legislation.

Clause 3.27 states that the effect of the FDS requires every local authority to have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

Consultation and Engagement:

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

Given the above, Auckland Council must take into account feedback provided by land developers and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS.

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

Feedback to the Draft FDS provides an opportunity for the private and public sector to collaborate to achieve quality planning outcomes for the current and future residents of Auckland. Council has not adequately engaged with the development sector who provide a large portion of Auckland's infrastructure and heavily influence Auckland's urban form and natural hazards. Without consulting developers, Council has produced a Future Development Strategy that does not meet the statutory requirements of the NPS-UD and LGA 2002.

Well-Functioning Urban Environment:

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

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

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and
(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active

transport; and

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

(e) support reductions in greenhouse gas emissions; and

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

Site Specific Feedback

The FDS has categorized the site as being located within the Warkworth South Central which under the Future Urban Land Strategy 2017 was proposed to be developed between 2028 – 2032 but is now recommended to be pushed back to 2040+ under the FDS. The draft FDS has also categorized the Warkworth South Central area, which includes the subject site, as an area "Recommended for further investigation."

Given the urban use of the site and the granted resource consent under which the church operates, the FDS should acknowledge in maps and in any reference to the area within the draft document, that 10 Mason Heights, Warkworth as a *"Resource Consent Area"* as Upper Ōrewa has been.

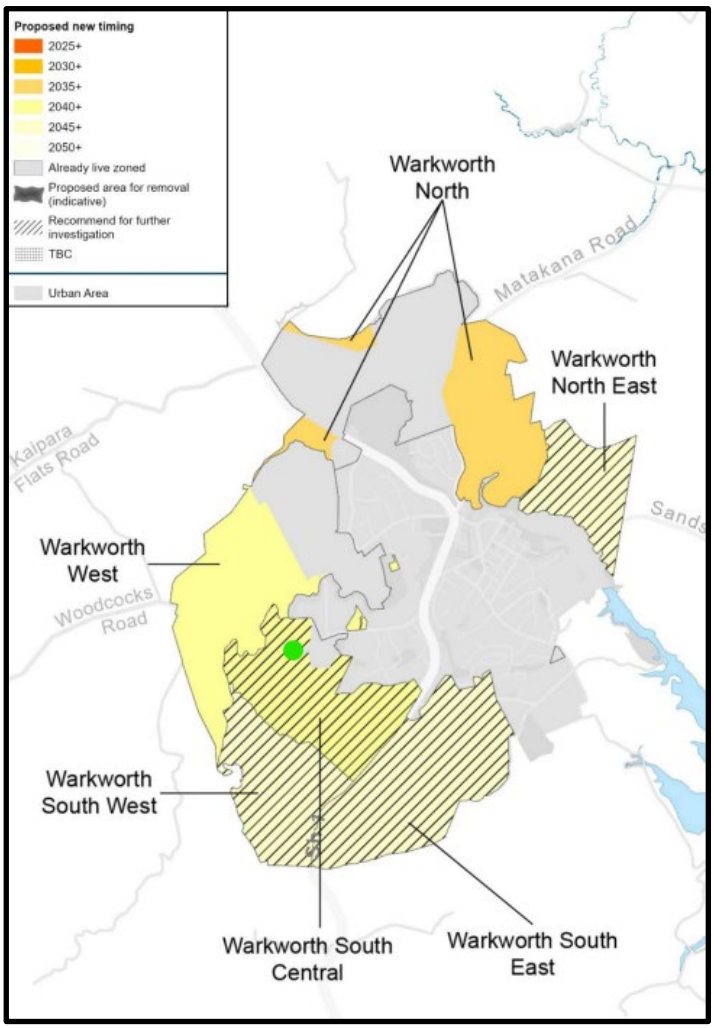


Figure 3: Subject site (green marker) recommended for further investigation (Source: Draft FDS, Appendix 8,

Conclusions and Outcomes Sought

Mason Heights Gospel Church seeks that the FDS is amended to identify the land at 10 Mason Heights, Warkworth as “Resource Consent Area”. It is sought that the relevant maps are updated, including any mention of this particular land area within the draft document.

Mason Heights Gospel Hall Trust does wish to be heard in support of this submission and requests that hearings be held to facilitate this outcome.

Yours sincerely



End of Report

Future Development Plan 2023 #8590

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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

Greenfield development that is properly planned can deliver sustainable developments. Infrastructure and transport connections can be adequately planned for at the outset of the development to ensure that site constraints. Some types of development, such as retirement living options, require large areas of land in one land holding. This type of development cannot be delivered affordably at scale through infill development. The growth of Auckland needs to be facilitated through a balanced approach of encouraging infill development, while allowing for greenfield development in appropriate areas.
Greenfield development is often more fiscally efficient than infill and is required to achieve the outcomes of the NPS UD with respect to providing a range of living options and well-functioning urban environments.

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

as urban centres grow, whether through infill development or greenfield, new urban centres will be required. Large-scale greenfield developments will require new local centres to be created to service the demands of the future population. A well-connected, resilient, and integrated greenfield development can also create accessible local centres as part of the comprehensive design of any larger scale greenfield development. The FDS needs to provide a more balanced approach to allowing for greenfield development while also encouraging infill.

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

Significant hazard risks do need to be defined and responded to. However, in many cases, like Riverhead, the flood hazard can be mitigated and avoided through sustainable urban design methods and best practice stormwater management. Flooding has been an issue for land development for centuries. The recent flood events do bring the issue to the forefront of mind. However, there are many good examples of where flood hazards can be effectively managed. The presence of a risk should not render land unsuitable for development. In the case of Riverhead, the flood hazard is not considered to be significant and can be effectively mitigated and managed as demonstrated by the recent decision to approve the development of the sites for the Retirement Village.

Matvin Group Limited is in agreement with the FDS that if there is a ‘significant risk’ that cannot be mitigated, then urban development should be located elsewhere. The use of the term ‘significant’ needs to be assessed in context. Where there are design options to avoid or mitigate natural hazards, they should not be considered significant.

The solution for flood hazard mitigation is determined at the Plan Change/Resource consent stage. For example, the area land that is subject to flooding at the northern end of the Riverhead FUZ could be used for stormwater attenuation and as a public amenity or for recreation purposes.

Careful management of flood prone land in balance with non- flood prone land can achieve well-functioning urban environments. The removal of FUZ due to the presence of a potential perceived flood risk does not allow for Developers to put forward a sustainable urban development option that is fit for purpose for the site, taking into account the site constraints. The identification of the need for further investigation and removal of the FUZ for this reason limits the ability to provide for all types of housing and commercial spaces to meet the demands of Auckland growing population. Auckland Council has the detailed assessments provided in support of the fast-track application and the Plan Change Request. Further Investigation is NOT REQUIRED. Council has sufficient information to know that any actual or potential flood hazard risk can be appropriately avoided or managed such that it is certainly not significant.
Well-designed greenfield development provides an opportunity to significantly reduce the impacts on infrastructure. It is generally cheaper and quicker to commission than upgrading exis ng infrastructure (which is what infill development requires) and can be paid for by the Developer without funding from Council.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

this is already the best practice approach for many large-scale developments and is an approach that is consistent with Mativn Groups development ethos. However, the most efficient way to achieve a nature-based infrastructure approach is through large scale developments. Infill development typically occurs on smaller sites where land is limited. With greenfield development, there is typically more space to allocate and plan for nature-based infrastructure solutions. For example, the consented development for the site includes an onsite stormwater solution that provides both a space on site for all stormwater to be managed and treated and an amenity for the residents of the site to enjoy. If the retirement village was to be located within an infill development, stormwater would likely be connected to the existing stormwater system present at the site, putting further constraints on its capacity.
Nature-based infrastructure requires a large area of land to be successful and can be best achieved through greenfield development. If Auckland Council want to prioritise nature-based infrastructure, then the approach taken in the FDS to prioritise infill development over greenfield development is inconsistent with this goal.

Other feedback

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

Please refer to the attachment

28/07/2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

This Feedback details the submitter, the affected property/ies and responds to the provisions of the draft Future Development Strategy ("**FDS**") in generic and specific ways including addressing the matters that Auckland Council has invited specific feedback on the Have Your Say webpage.

Submitter Details

This feedback is provided on behalf of: Matvin Group Limited

Property or Area of Interest Affected by the FDS: Future Urban zoned land at Riverhead and [redacted]

Address for Service

Name: [redacted]

[redacted]

Phone: [redacted]

Property Details

The submitter has a particular interest in the land at 1092 Coatesville Riverhead Highway.

The land is held in two titles ([redacted]), both of which are owned by [redacted]. There is a Caveat on the title that refers to:

- 12123523.1 CAVEAT BY MATVIN GROUP LIMITED - 17.5.2021 at 10:14 am

The caveat refers to an Agreement for Sale and Purchase dated 8/12/2020 between the Registered Owners [redacted] as vendor and the Caveator Matvin Group Limited as purchaser.

Matvin Group Limited is a specialist residential, commercial, and industrial property developer based in Auckland, with over 20 years' experience designing and delivering a variety of quality and commercially successful projects.

The land subject to this submission is currently zoned Future Urban within the Auckland Unitary Plan (Operative in Part). The land surrounding the site comprises of Future Urban to the South and the West and Northwest and Residential Single House (Mixed Housing Urban under Plan Change 78) to the East and Northeast along Cambridge Road.

The Future Urban Land Supply Strategy – updated 2017 ("**FULSS**") identified the Future Urban zoned land at Riverhead as sequenced to be "*Development Ready*" in the first half of the second decade – 2028 to 2032.

Auckland Transport have submitted a Notice of Requirement ("**NoR**") for upgrades to the transport network adjacent to the site. The works include the upgrading of the Coatesville- Riverhead Highway and Riverhead Road intersection to a roundabout. Notably one of the objectives of the NoR's is for the integration with and support for the existing and future environments and future transport network at Riverhead:



Consent has been granted under the Covid-19 Recovery (Fast Track Consenting) Act 2020 for the construction of a retirement village complex, called "The Botanic" on the site, providing approximately 422 residential units, 88 care beds and associated facilities, together with a separate childcare facility and café across both titles. Auckland Council has appealed this decision under the Covid-19 Recovery Act 2020 to the High Court and a hearing is scheduled for 15- 16 August 2023.

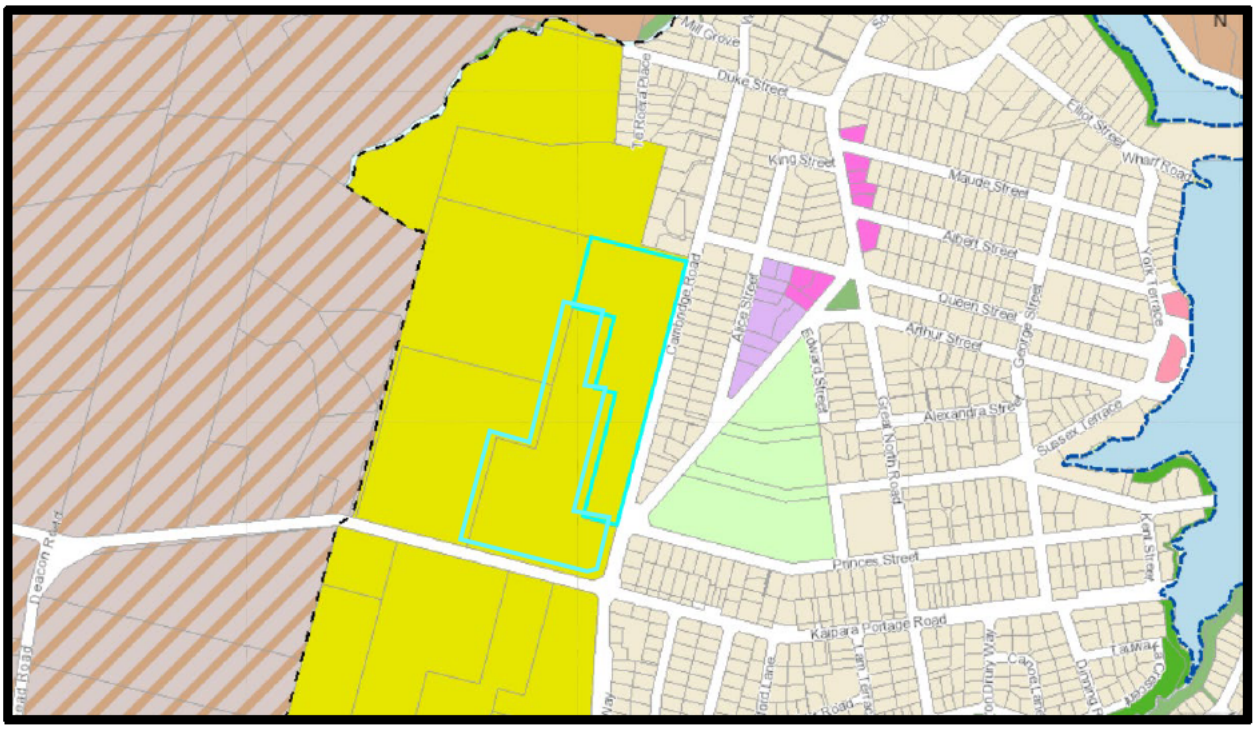


Figure 1- Location of the land of interest to Matvin Limited, highlighted by the blue lines. Source- AUP Geo Maps (20/07/2023)

The land zoned "Single Housing" to the east of the site contains predominantly one and two storey dwellings, with the new housing typologies consisting of two storeys. Three storey townhouses are becoming a part of the existing environment, as shown by the new development along Alice Street. The context of the area and related character is changing. The land to the west of the FUZ is zoned Rural-Mixed Rural and contains a wide variety of non-rural land uses including childcare centres, caravan parks and industrial activities.

The Riverhead War Memorial Park is situated opposite the site across the Coatesville-Riverhead Highway. This provides an important community asset in very close proximity to the site. Existing commercial activities (local centre) are located to the northeast, and a restaurant / bar exists on the river front further east. Opposite the northern end of the War Memorial Park is a mixed-use development consisting of a three-storey terrace form fronting Coatesville Riverhead Highway with commercial space at the ground level and residential above.

The FDS identifies the Future Urban zoned land at Riverhead as Area for Further Investigation and a small portion to the north of the Matvin land to be removed.

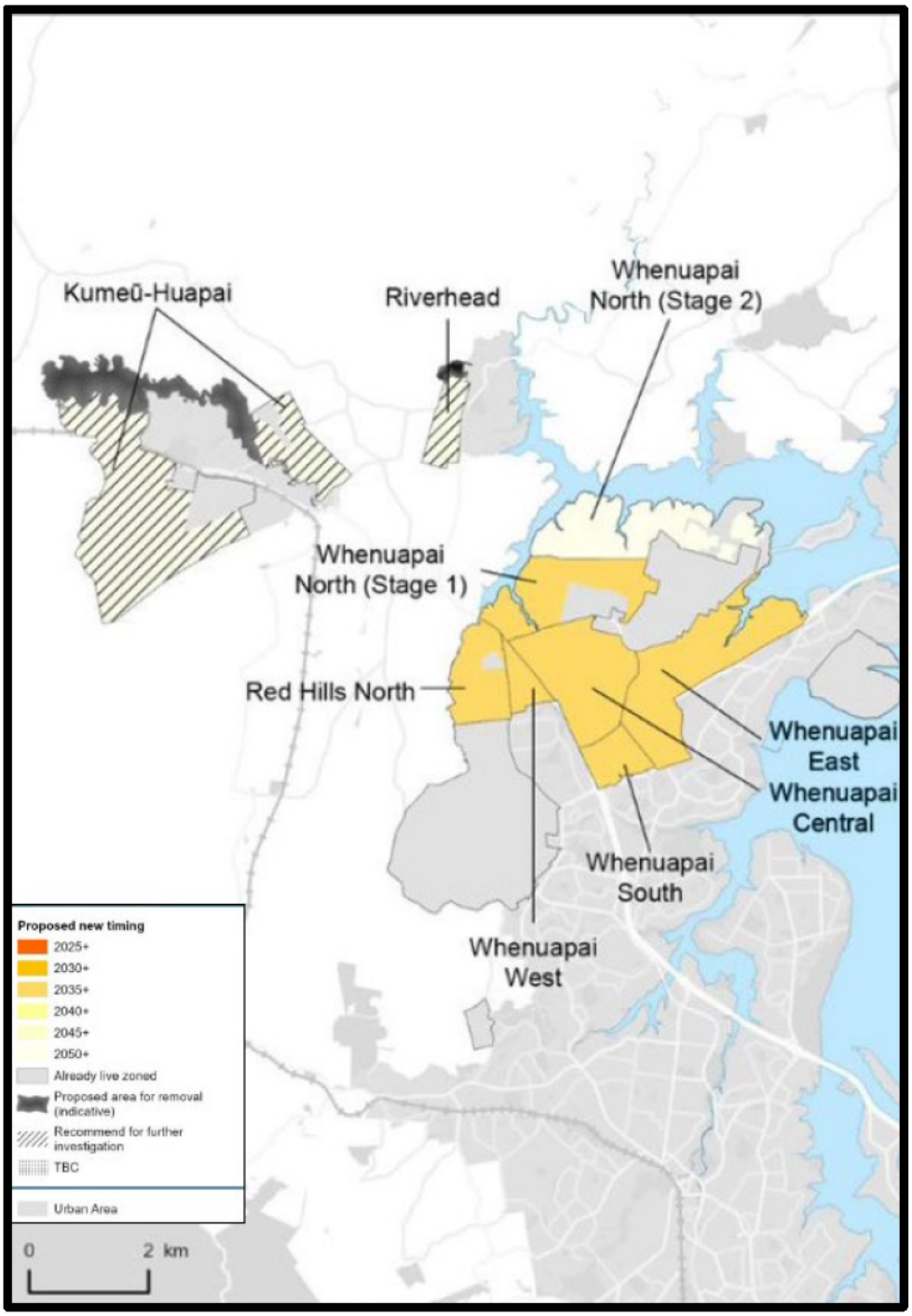


Figure 2 – Draft Future Development Strategy showing land Recommended for Further Investigation

Generic Feedback

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

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

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:

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

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

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

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

(2) Every FDS must spatially identify:

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

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

(c) any constraints on development.

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

Clause 3.14 states the FDS must be informed by:

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

(b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS

(c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans

(d) Māori, and in particular tangata whenua, values and aspirations for urban development

(e) feedback received through the consultation and engagement required by clause 3.15

(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement

(g) any other relevant national policy required by, or issued under, legislation.

Clause 3.27 states that the effect of the FDS requires every local authority to have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

Riverhead Future Urban zoned land is efficient to develop given the relatively flat topography and access to existing infrastructure. The upgrades required to support development of the Future Urban zoned land are relatively minor and can be staged to align with urban growth.

Consultation and Engagement:

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

Given the above Auckland Council must take into account feedback provided by land developers and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS.

Matvin Group Limited were not consulted by Auckland Council. This is inconsistent with the requirements of Clause 3.15 above. As noted previously, Matvin Group Limited have a caveat on the title, which registers their interest in the land. As such, Matvin Group should have been consulted by Auckland Council. Auckland Council is well aware of the Consent (subject to appeal) that Matvin Group Limited hold for the development of the land at the subject site. Auckland Council is also fully aware of the other developer's, including Matvin, who are pursuing a private plan change request for the urban development of all of the Future Urban zoned land at Riverhead. Recently Auckland Council staff recommended the private plan change be accepted for notification. The elected representatives voted against the staff recommendation and that Request is also subject to appeal.

By not engaging with Matvin Group Limited, and the other plan change Request parties, over the preparation of the FDS, Auckland Council has missed an opportunity to discuss the many advantages of how the development of this land can achieve the purpose of the FDS, as set out above, namely, to achieve well-functioning urban environments in existing and future urban areas now and over the long-term.

By not properly engaging with the development sector, including Matvin Group Limited on the Riverhead FUZ, the FDS is inconsistent with the NPS-UD.

Well-Functioning Urban Environment:

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

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

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and

(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

Greenfield housing options are required to deliver a wider range of housing options to create a well-functioning urban environment as defined above. The Riverhead land will enable a well-functioning urban environment to be created in this location that will respond to current and future growth demand in the western part of the region.

In order to achieve competitive land markets there needs to be more supply of land, not less. A constrained market is contrary to the objectives and policies of the NPS UD.

Site Specific Feedback

The FDS seeks to PARTIALLY REMOVE the Future Urban zoning at Riverhead for the following reasons:

1. *"Significant hazard constraints, including approximately 30% of FUA covered by a 1% annual exceedance probability (1% AEP) flood plain. Portions of the Kumeū-Huapai Riverhead FUA proposed for removal are parcels entirely or mostly within this floodplain extent and have few appropriate land uses.*

2. *Potential for higher VKT and CO2 emissions than other FUAs due to Kumeū-Huapai Riverhead FUA being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs."*[1]

This submission demonstrates that these reasons are INSUFFICIENT and FLAWED for the Future Urban land at Riverhead for the following reasons:

- Significant Hazard Constraints:

The Riverhead FUZ is subject to some identified overland flows paths (hatched lines) and flood plain (light blue) as shown in Figure 2. Aspire Consulting Engineering Ltd have prepared a Site Wide Stormwater Management Plan (SMP) for the proposed Development on the land referred to in this submission. The SMP, which is referred to in the conditions of the consent for the retirement village outlines the overall impacts and management strategy for the stormwater generated from the proposed development once operational. The Stormwater will be managed via an integrated treatment train approach, with source devices working in conjunction with multiple dry basins to manage flows. Devices

[1] Draft Future Development Strategy- Appendix 7, Page 29.

such as swales and reuse tanks will be incorporated to provide some level of treatment and attenuation prior to entering the Detention basins. The proposed stormwater management approach is consistent with the aims and objectives of the FDS and in fact the Auckland Unitary Plan. It has been demonstrated that stormwater can be managed to ensure there are no natural hazard effects or adverse effects associated with climate change.

The proposed stormwater management devices will be able to attenuate a 1% AEP storm event. The land subject to this submission DOES NOT include flood hazards as identified by the AUP. Stormwater is able to be appropriately managed to reduce the risks of flooding within the site and the surrounding areas. The natural hazard risk is minimal to the point of barely measurable and should not be defined as "significant."

For the reasons above, the removal of the FUZ from the land subject to this submission would be unjustified. There are areas within the FUZ which could be at risk of significant flood hazards as shown in Figure 2 below. However, a structure plan and plan change process is the appropriate pathway to assess the options and detail associated with issues such as natural hazards. The SMP for the plan change Request assesses and addresses the flood hazard. That assessment will rightly be tested through the plan change process once the plan change is allowed to be accepted and notified.

Where there is no significant hazard risk (as is the case for this particular site), the FUZ should remain as there is no rationale for its removal.

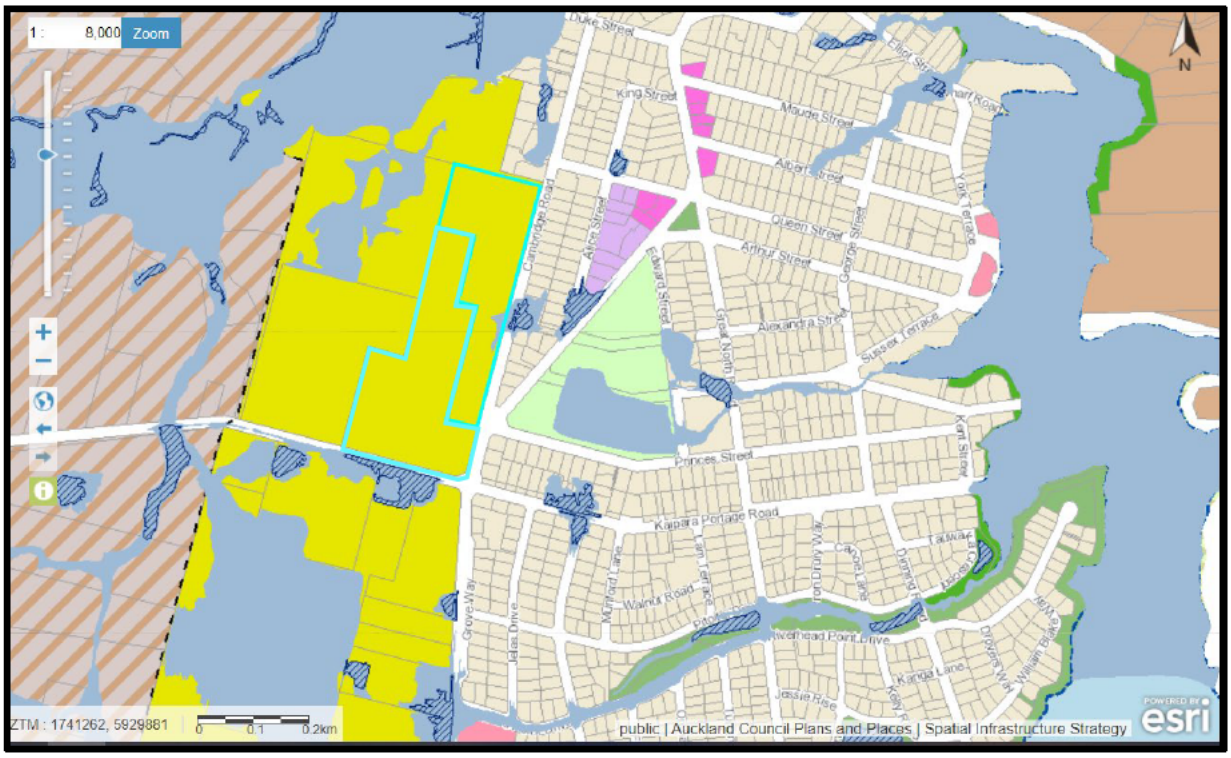


Figure 3- Areas prone to the 1:100-year flood event, highlighted in light blue. Location of the land of interest to Matvin Limited, highlighted by the blue lines. Source- AUP Geo Maps (20/07/2023)

- Climate Change and Accessibility

The Consent Application was supported by an Integrated Traffic Assessment (ITA), prepared by TEAM Ltd. The assessment provides a full assessment of the proposed development and its potential impacts on the existing road networks. The assessment details the additional traffic generated by the proposed development on the operation of the existing road network. The modelling concludes that the additional traffic generated is not expected to have any significant effects on the operation of the surrounding network. Retirement village activities generate less traffic than standard residential activities.

The rationale that Riverhead is distant from high quality existing or planned public transport should not be a reason for dismissing the Riverhead FUZ from urban development. There are number of bus stops located on Coatesville-Riverhead Highway, with the nearest bus stops located adjacent to the subject site. These bus stops are serviced by bus route 126 which provides a connection between Westgate and Albany Station via Coatesville-Riverhead Highway. The frequency of route 126 is typically every hour throughout the entire day including weekends. As noted previously, Auckland Transport as also seeking to upgrade the intersection of the Coatesville-Riverhead Highway and Riverhead Road, which includes acquiring a small portion of the land referred to in this submission. It was also concluded that additional retirement population in this location would likely support the off-peak public transport options.

Not all types of urban development generate the same levels of VKT or CO2 or demand for employment. The Retirement Village is a good example of an urban land use that generates employment for the local community (approximately 64 FTE's) while creating less VKT than traditional residential development. When the land is rezoned, the impact of the rezoning and land use on the public transport network should be assessed at the time. The use of the Site for retirement living represents a sustainable land-use option for this site based on the current public transport options within Riverhead. As such, the land should remain FUZ as options for well-functioning urban environments can be achieved on the site.

Specific Feedback in Response to Have Your Say

Focusing Growth:

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

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

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

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

Disagree in part- Greenfield development that is properly planned can deliver sustainable developments. Infrastructure and transport connections can be adequately planned for at the outset of the development to ensure that site constraints. Some types of development, such as retirement living options, require large areas of land in one land holding. This type of development cannot be delivered affordably at scale through infill development. The growth of Auckland needs to be facilitated through

a balanced approach of encouraging infill development, while allowing for greenfield development in appropriate areas.

Greenfield development is often more fiscally efficient than infill and is required to achieve the outcomes of the NPS UD with respect to providing a range of living options and well-functioning urban environments.

Accessible Local Centres:

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

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

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

Agree In part- as urban centres grow, whether through infill development or greenfield, new urban centres will be required. Large-scale greenfield developments will require new local centres to be created to service the demands of the future population. A well-connected, resilient, and integrated greenfield development can also create accessible local centres as part of the comprehensive design of any larger scale greenfield development. The FDS needs to provide a more balanced approach to allowing for greenfield development while also encouraging infill.

Avoiding Hazards:

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

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

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

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

Agree in part- Significant hazard risks do need to be defined and responded to. However, in many cases, like Riverhead, the flood hazard can be mitigated and avoided through sustainable urban design methods and best practice stormwater management. Flooding has been an issue for land development for centuries. The recent flood events do bring the issue to the forefront of mind. However, there are many good examples of where flood hazards can be effectively managed. The presence of a risk should not render land unsuitable for development. In the case of Riverhead, the flood hazard is not considered to be significant and can be effectively mitigated and managed as demonstrated by the recent decision to approve the development of the sites for the Retirement Village.

Matvin Group Limited is in agreement with the FDS that if there is a 'significant risk' that cannot be mitigated, then urban development should be located elsewhere. The use of the term 'significant' needs to be assessed in context. Where there are design options to avoid or mitigate natural hazards, they should not be considered significant.

The solution for flood hazard mitigation is determined at the Plan Change/Resource consent stage. For example, the area land that is subject to flooding at the northern end of the Riverhead FUZ could be used for stormwater attenuation and as a public amenity or for recreation purposes. Careful management of flood prone land in balance with non- flood prone land can achieve well-functioning urban environments. The removal of FUZ due to the presence of a potential perceived flood risk does not allow for Developers to put forward a sustainable urban development option that is fit for purpose for the site, taking into account the site constraints. The identification of the need for further investigation and removal of the FUZ for this reason limits the ability to provide for all types of housing and commercial spaces to meet the demands of Auckland growing population. Auckland Council has the detailed assessments provided in support of the fast-track application and the Plan Change Request. Further Investigation is NOT REQUIRED. Council has sufficient information to know that any actual or potential flood hazard risk can be appropriately avoided or managed such that it is certainly not significant.

Well-designed greenfield development provides an opportunity to significantly reduce the impacts on infrastructure. It is generally cheaper and quicker to commission than upgrading existing infrastructure (which is what infill development requires) and can be paid for by the Developer without funding from Council.

Resilient Infrastructure:

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

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

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

Agree in part- this is already the best practice approach for many large-scale developments and is an approach that is consistent with Mativn Groups development ethos. However, the most efficient way to achieve a nature-based infrastructure approach is through large scale developments. Infill development typically occurs on smaller sites where land is limited. With greenfield development, there is typically more space to allocate and plan for nature-based infrastructure solutions. For example, the consented development for the site includes an onsite stormwater solution that provides both a space on site for all stormwater to be managed and treated and an amenity for the residents of the site to enjoy. If the retirement village was to be located within an infill development, stormwater would likely

be connected to the existing stormwater system present at the site, putting further constraints on its capacity.

Nature-based infrastructure requires a large area of land to be successful and can be best achieved through greenfield development. If Auckland Council want to prioritise nature-based infrastructure, then the approach taken in the FDS to prioritise infill development over greenfield development is inconsistent with this goal.

General Feedback

The Future Urban Land Supply Strategy – updated 2017 ("FULSS"), was prepared to provide direction, and a degree of certainty, to assist with infrastructure planning for the Future Urban zoned land areas across Auckland. The FULSS identified the Future Urban zoned land at Riverhead (as identified in Figure 1) as sequenced to be "*Development Ready*" in the first half of the second decade – 2028 to 2032 – Refer Figure 3 below.

Development Ready in the FULSS means that the land is live zoned for urban purposes (residential, business zones) and is able to service urban development with infrastructure. While the land in the FUZ at Riverhead is not 'live zoned', the consented development is able to be serviced with infrastructure and there is funding available from the developer to provide for the upgrades that are discussed later in the application.

The assessments submitted to support the Consent Application for the retirement village and the Plan Change Request provide evidence that the infrastructure is available, or can easily be made available, to service the site and the upgrades needed can and will be funded by the development. This land is effectively *Development Ready* ahead of the finalisation of the live zoning. As noted, the land is anticipated to be developed for residential purposes as identified in the Spatial Land Use Framework.

Given the FULSS identified the land at Riverhead to be ready for development in 2028, five years away, plans were in place and a significant investment has been made to prepare the land for development, including the submission of a Private Plan Change application to rezone the land subject to this submission and the surrounding FUZ to a mix of Residential and Commercial zonings. While the Private Plan Change submitted to Auckland Council in July 2022 was rejected by Auckland Council (against planning staff recommendation) due to the lack of infrastructure, this does not pose rationale to remove the FUZ from Riverhead.

To propose to further investigate and remove land that is planned to be ready for development in five years from the FDS, and to not stipulate a timeframe for the site to be ready for development, creates significant uncertainty which is directly contrary to the stated purpose of the Future Urban zoning as per s32 reports for the Unitary Plan. This poses a significant risk and cost to Matvin Group Limited who have invested a notable amount of time effort and funds into preparing this land for development in accordance with the zoning of the land and the FULSS. The FDS places significant uncertainty as to the future use and value of the land. Future Urban zoned land commands a higher value because it was intended to provide certainty to landowner's developers and Council Controlled Organisations etc. The FDS removes this certainty.

In the case of the development of the land subject to this submission, a number of significant infrastructure upgrades are included in the Consent Conditions, including providing stormwater retention on site, a new potable water main and wastewater infrastructure on site. This infrastructure will be provided by the Developer.

Larger greenfield or brownfield sites are required to deliver retirement living opportunities at scale to meet the growing demand of the aging population[2]. Acquiring multiple sites in already developed urban areas increases the overall cost of development which impacts on the ability to deliver affordable and high-quality retirement living options. The consented development delivers 422 residential units for over 65's. This scale of development cannot be achieved through infill housing without significantly increasing the development cost.

Conclusions and Outcomes Sought

Matvin Group limited urges Auckland Council to engage with them actively and meaningfully, and the wider plan change development group, to ensure that a robust and well considered assessment is undertaken before a decision is made to remove the FUZ at Riverhead. The Riverhead FUZ is appropriate for urban development and the developer is prepared to fund the infrastructure required to achieve a good urban outcome. Some of the land is subject to flooding, however, the FUZ can be developed in a way that mitigates and manages the flood risk. Removing existing FUZ land simply because of the flooding overlay does not provide a rational reason to prevent development.

Matvin Group Limited request that as a minimum, the land referred to in this submission has the *Recommended for Further Investigation* notation removed and the land remains clear so that the FDS retains the FUZ as there are no identified flood risks or other reasons to remove or question the FUZ in this location.
There are public transport connections at the site. Development of the land as proposed by Matvin Group Limited will create job opportunities and education opportunities within Riverhead, creating positive social benefits, hence one of the reasons the proposal satisfies the Fast-Track Act requirements.

The consented development on the site proves that a sustainable option for increasing housing supply in Auckland can be achieved, while minimizing risk of natural hazards and without resulting in an adverse effect on the existing transport system. Removing the Riverhead FUZ based on the reasoning within the FDS is short sighted, does not meet the demand for increased housing supply in Auckland and removes the opportunity for developers to put forward a development approach that is suitable for this site taking into account the constraints.

Matvin requests that Auckland Council holds hearings in front of Independent Hearing Commissioners and wishes to be heard in support of its submission.

[2] *Better Later Life- He Oranga Kamatua 2019-2034*[5] is the Governments key strategy for New Zealand's aging population. The Better Later Life Strategy notes that the proportion of older people compared to the rest of the population is increasing. By 2034, there will be 1.2 million people aged 65+ (21% of the total population).

Yours sincerely



Attachments:

1 - Figure 42 from the FDS showing the timings for development at Riverhead.

Attachment 1: Figure 42 from the FDS showing the timings for development at Riverhead.

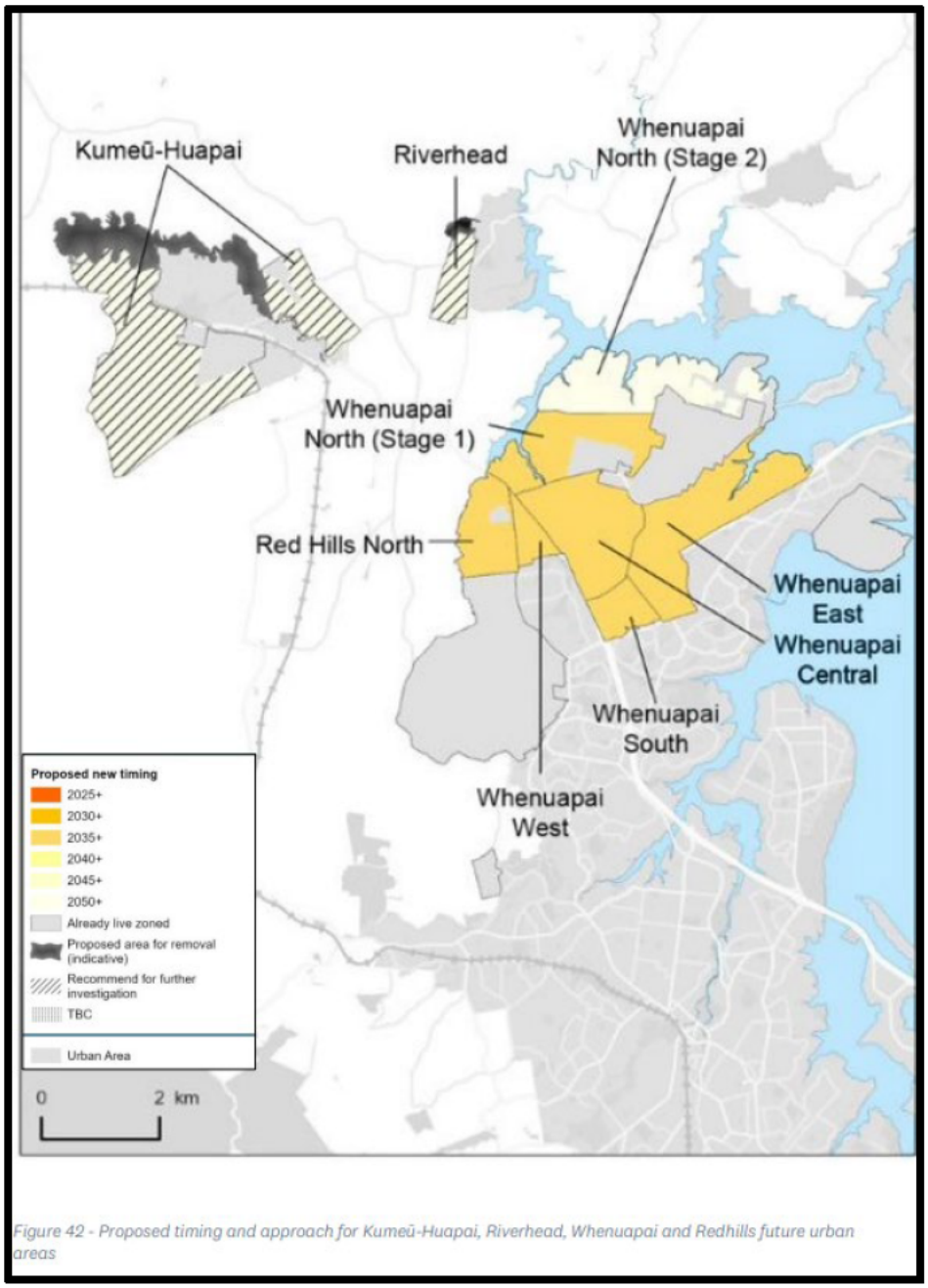


Figure 42 - Proposed timing and approach for Kumeū-Huapai, Riverhead, Whenuapai and Redhills future urban areas

End of Report

Future Development Plan 2023 #8591

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

Your feedback

Focusing growth

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

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

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

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

Tell us why

Accessible local centres

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

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

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

Tell us why

Avoiding hazards

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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please refer to the attachment

27 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

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

Submitter Details

This feedback is provided on behalf of:	The Planning Collective
Land Interest Affected by the FDS:	The Area of Future Urban zoned (FUZ) land bound by McKinney Road and John Andrew Drive, Warkworth and the Residential - Mixed Housing Suburban zoned land along McKinney Road, Warkworth recently rezoned through Private Plan Change 72 (PC72)

Address for Service

Name:	The Planning Collective Attention: Burnette O'Connor
Email Address:	Burnette@thepc.co.nz
Phone:	[redacted]

Land Area Details

This submission relates to the Future Urban zoned land bound by McKinney Road and John Andrew Drive, Warkworth and the Residential - Mixed Housing Suburban zoned land along McKinney Road which has been recently rezoned through PC72. Figure 1 overleaf identifies the land areas subject to this submission.

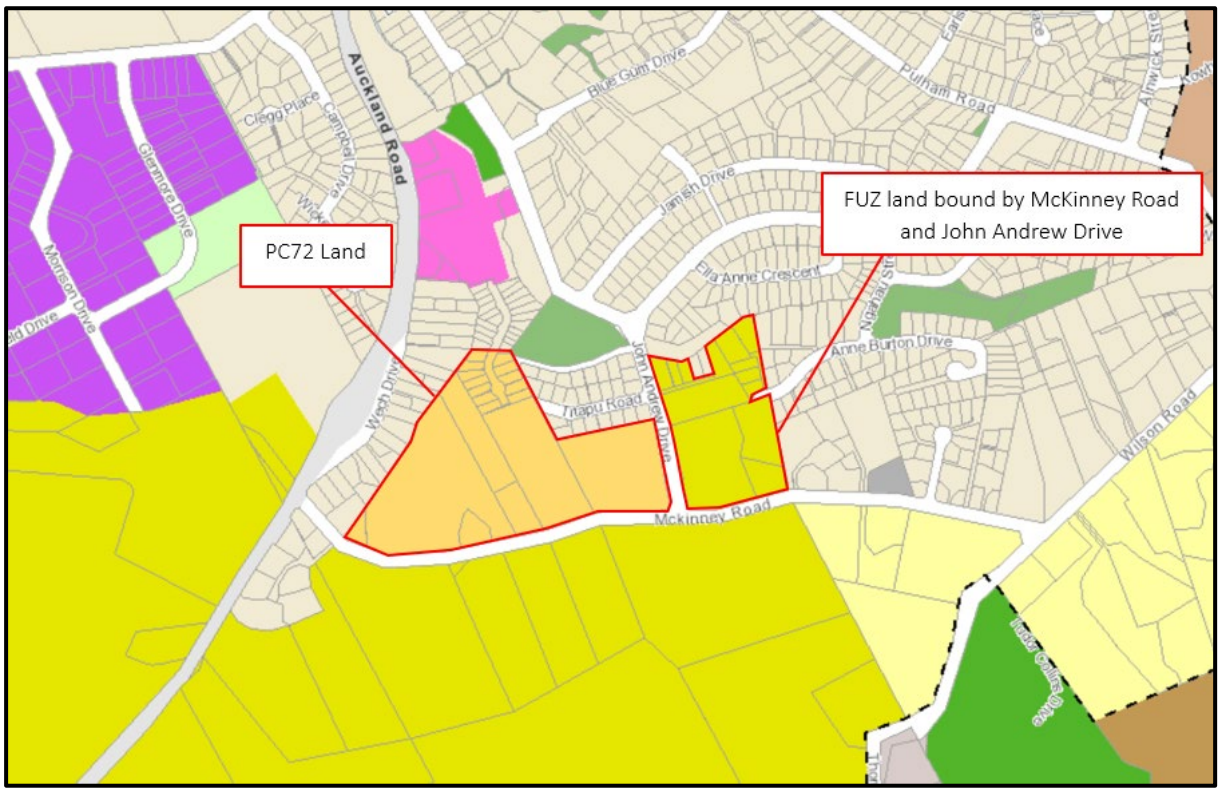


Figure 1: AUP-OP Maps identifying land subject to this submission

FUZ land bound by McKinney Road and John Andrew Drive

Resource consents have been obtained to develop this land for residential purposes ahead of the live-zoning of the land. The land is in the process of being developed for residential purposes. There are no bulk infrastructure constraints that are preventing the development of this Future Urban land.

PC72 Land

PC72 sought to rezone the land in question from Future Urban to Residential - Mixed Housing Suburban and to introduce a new precinct within the Auckland Unitary Plan - Operative in Part to address wastewater infrastructure staging, transport network, ecology and water quality effects. PC72 was approved by Auckland Council on the 10 February 2023 and was made operative on the 7 June 2023.

Generic Feedback

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

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

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:

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

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

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

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

(2) Every FDS must spatially identify:

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

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

(c) any constraints on development.

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

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

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

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

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

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

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

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

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

(e) support reductions in greenhouse gas emissions; and

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

Clause 3.14 states the FDS must be informed by:

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

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

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

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

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

The submitter requests that the FDS recognises and reinforces the significant role of future urban areas (for Auckland, the "Future Urban Zone") make in terms of their ability to deliver affordable urban development and create a variety of housing and living environments as well as integrated employment areas. But at the same time, the FDS needs to recognise that it is not realistic for the growth demand to be met and infrastructure issues to be resolved if greenfield development is constrained, at least to the

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

Consultation and Engagement:

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

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

> *(a) to enable democratic local decision-making and action by, and on behalf of, communities; and*
> *(b) to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future.*[1]

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

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

Feedback

FUZ land bound by McKinney Road and John Andrew Drive

The FDS shows this FUZ land as an area recommended for further investigation and delays the timing from 2028-2032 to 2045+. This submission seeks that this area of FUZ land be shown as an area that has been consented for urban development. This land has been developed for urban purposes and therefore the submitter requests that the FDS show this land as a "Resource Consent Area" and that the relevant maps are updated to show the land as being live-zoned through the upcoming Auckland Unitary Plan review process.

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

PC72 Land

The FDS shows the PC72 land as an area recommended for further investigation and delays the timing from 2028-2032 to 2045+. This land has already been live zoned and therefore the submitter seeks that the FDS show this land as an area "already live zoned".

The Planning Collective wishes to be heard in support of their submission and seeks that hearings in front of independent hearing commissioners be held given the strategic importance of the FDS to current and future planning.

Yours sincerely



Burnette O'Connor
The Planning Collective Limited
[redacted]
Email: burnette@thepc.co.nz

End of Report

Future Development Plan 2023 #8592

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

The Draft Future Development Strategy (FDS) fails to recognise the

important role of rural and coastal towns and villages within the Auckland region. Its sole focus on urban areas is at the detriment of these distinct rural communities as well their productive rural surrounds.
1.2. Rural and coastal towns and villages have their own individual identity and sense of place which cannot be replicated or replaced by focusing simply on managing growth in the metropolitan Auckland urban area. People choose to live in those settlements, outside of urban Auckland, because of what they can deliver, particularly in terms of amenity, employment, education and recreation /sporting opportunities.

Accessible local centres

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

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

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

Other

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?

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please see attached submission

Ngāti Te Ata- Feedback on Draft Future Development Strategy in respect of Clarks Beach

Feedback emailed via futuredevelopmentstrategy@aucklandcouncil.govt.nz

1. Executive Summary

1.1. The Draft Future Development Strategy (FDS) fails to recognise the important role of rural and coastal towns and villages within the Auckland region. Its sole focus on urban areas is at the detriment of these distinct rural communities as well their productive rural surrounds.

1.2. Rural and coastal towns and villages have their own individual identity and sense of place which cannot be replicated or replaced by focusing simply on managing growth in the metropolitan Auckland urban area. People choose to live in those settlements, outside of urban Auckland, because of what they can deliver, particularly in terms of amenity, employment, education and recreation /sporting opportunities.

1.3. Rural and coastal towns and villages are therefore distinct from urban areas. They have a different context which calls for a different management approach. However, this is not identified and supported by the FDS.

1.4. The FDS must be amended to specifically enable the managed and continued growth of rural and coastal towns and villages to meet the demands of people wishing to live and contribute to rural communities.

2. Ngāti Te Ata

2.1. Ngāti Te Ata have been living in the in the south-west part of Tamaki Makaurau for a thousand years. The Te Pae o Kaiwaka Pa, today known more commonly as Waiuku, was the principal pa of Ngāti Te Ata, where our founding ancestor Te Ata i Rehia resided and subsequent leading chiefs of the Iwi. The identity of Waiuku, Clarks Beach and Waiau Pa and its surrounding environment is synonymous with Ngāti Te Ata.

2.2. However, as part of the land wars in the Waikato, the military invasion and confiscation of over 100,000 acres of Ngāti Te Ata land in the area, crippled our economy and people's livelihood. This tragic history, for which redress is still being sought, should not be forgotten by decision makers, including the Auckland Council. The negative impacts of past Triti breaches are properly acknowledged in the draft FDS (page 18). The devastating impact of that early period of colonisation had significant impacts on the wellbeing of Ngāti Te Ata. Appropriate development opportunities for Ngāti Te Ata, in is own rohe, is essential to reverse the negative historical impacts on our people by empowering our Iwi members to provide for themselves, and their whanau.

2.3. In a contemporary context this means that Ngāti Te Ata need to be able to exercise our Triti guaranteed rangatiratanga over traditional places of residence, where our people once flourished. Improving the wellbeing of our people has not changed as a priority goal. That wellbeing depends on having access to services, employment, education, housing, and cultural opportunities. Regrettably, being of a generally lower socio-economic

disposition, if opportunities are limited, or rationed, it is our people that usually suffer first.

3. Submission

3.1. Ngāti Te Ata's primary concern is that the FDS disregards the important role that rural coastal towns and villages play in regard to providing people with choice as to where and how they live their daily lives. People choose to live in settlements like Clarks Beach because of the lifestyle opportunities that they offer in terms of amenity, employment and education.

3.2. The FDS fails to acknowledge that the growth and development of existing or new rural coastal towns and villages is specifically provided for in the Regional Policy Statement.

3.3. A specific objective[1] in the RPS is to enable the growth and development of rural coastal towns and villages subject to the avoidance of adverse impacts (including scheduled features, elite/prime soils, hazard risks) and subject to this growth and development being consistent with the local character of those settlements and their surrounds. There is otherwise nothing in the RPS that would prohibit or restrict such growth and development. The FDS in its current form conflicts with these enabling RPS policies.

3.4. Also relevant is the RPS objective[2] of enabling the growth and development of rural and coastal towns and villages subject to these having adequate infrastructure. In this regard, Watercare is about to have significant investments in water and wastewater at Clarks Beach in order to accommodate growth and development within these settlements. It is not only important to ensure the adequacy of this infrastructure to provide for growth, but it is equally important to maximise investments that have already been committed, such as these.

3.5. The RPS policy directives[3] enable Council to include provision in the Plan to provide for these growth outcomes. This means that there is a requirement for Council to be purposely active in allowing growth proposals in rural and coastal villages and settlements.

3.6. The RPS has been deliberately framed to provide a tailored approach for rural and coastal towns and villages. In arriving at the RPS objectives and policies (as per the footnotes above), the Independent Hearings Panel (Panel) for the Auckland Unitary Plan hearings acknowledged that towns and villages throughout the region provide different housing choices and support for rural communities and activities.

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[1] *RPS Objective B.2.6.1(1)*

[2] *RPS Objective B.2.6.1(2)*

[3] *RPS Policy B.2.6.2 (5) Enable the establishment of new or significant expansions of existing rural and coastal towns and villages through the structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines*
RPS Policy B.2.6.2 (6) Enable small-scale growth of and development in rural and coastal towns and villages without the need for structure planning, in a manner consistent with policies B2.6.2(1) and (2)

3.7. The following excerpts from the Panel's report to Council[4] are relevant (with our emphasis in bold):

> *The principal changes recommended by the Panel are:*
>
> *i. to remove the distinction between serviced and un-serviced villages;*
>
> *ii. not to require the Rural Urban Boundary around rural and coastal towns and villages; and*
>
> *iii. to enable new towns and villages and extensions to existing towns and villages within clear circumstances.*
>
> *On the evidence presented, the main issue in relation to whether villages are serviced or not is the adequate of the sizes of sites (and the nature of the soil) to accommodate on-site waste treatment and discharge facilities. As part of the consideration or rural subdivision, the Council presented evidence which acknowledged that this can be properly assessed as part of subdivision applications.* ***On that basis there is no need to differentiate villages for this purpose in the regional policy statement.***
>
> *…*
>
> *A secondary issue was that the growth of rural towns and villages posed a challenged to the quality compact urban form strategy by enabling growth outside the Rural Urban Boundary. At the outset of the hearings the Council was proposing that further work would need to be done to identify locations where such a boundary should be placed, beyond its primary location around the main urban areas of Auckland, Warkworth and Pukekohe.*
>
> *As explained in the Panel's Report to Auckland Council – Changes to the Rural Urban Boundary, rezoning and precincts July 2016, the Panel does not recommend that the Rural Urban Boundary be placed around the rural and coastal towns and villages.* ***The purpose of the control is to address the growth issues of those urban areas by identifying areas for future urbanisation. There is no evidence that this purpose needs to be addressed at the smaller towns and villages in the region. A better approach to controlling the growth of these towns and villages is by a combination of the restrictions on the intensity of rural subdivision and the expectation that any change of zoning, and in particular any change from a rural to an urban zone, will involve a structure planning process*** *done in accordance with the structure plan guidelines in the Plan (see Appendix 1 Structure plan guidelines).*
>
> *…*
>
> *The Panel, after hearing the regional policy statement submissions and evidence of the Council and submitters considers that* ***it is appropriate***

[4] *Hearing topic 013 Urban growth July 2016; section 7 Rural and coastal towns and villages, pp 13-15*

and necessary to provide for new towns and villages outside of the Rural Urban Boundary*. …*

3.8. Council accepted these Panel recommendations. No circumstances have arisen since Council declaring these provisions operative that would justify the FDS taking such a fundamentally different approach to the managing growth and development of towns and villages that are outside the Rural Urban Boundary. In fact the opposite has occurred where National Policy Statement for Urban Development requires that Council's "*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*"[5].

3.9. The FDS approach of a solely Auckland urban metro-centric growth strategy is therefore at the detriment of the need to have a finer grained and more nuanced approach to managing growth outside of the Rural Urban Boundary. It would not work to replicate a growth framework that might be appropriate in metropolitan urban Auckland and apply that to rural and coastal towns and villages. Hence, the management of growth outside the Rural Urban Boundary needs to remain different to urban growth that occurs inside the Rural Urban Boundary.

3.10. Rural Franklin is a very distinct community. This was acknowledged in the former Franklin District Growth Strategy (FDGS). That strategy noted that over a 30 year period, the demand and growth for countryside living was significant and that that had consequently led to the irreversible loss of versatile land[6]. The FDGS was therefore focused on managing the extent and proportion of potential growth yields between towns, villages and the rural area of the former Franklin District.

3.11. In applying that focused approach, the FDGS did not prohibit the growth of rural and coastal towns and villages. Instead, it supported the careful management of growth within the whole of that district, acknowledging that rural and coastal towns and villages needed to continue providing options for people to 'live, work and play' in self-sustaining and vibrant settlements, while redirecting the demand for countryside living opportunities away from latent lots that contain versatile soils. This latent capacity remains significant (this being vacant lots that were created in their thousands from the Town and Country Planning Act) in Franklin. The RPS objectives and policies for rural and coastal towns and villages remain consistent with that FDGS approach.

3.12. For Franklin, in particular, there has always been a strong approach of enabling growth to occur in the towns and villages as the most efficient means to provide for resident demand to live in rural areas. However, the FDS deliberately restricts the ability of towns and villages outside of the Rural Urban Boundary to provide solutions for what remains fast-growing areas of Auckland.

3.13. The approach of the FDS to limit growth opportunities associated with these rural and coastal towns and villages is unlikely to result in residents choosing

[5] Policy 2 NPS-UD

to live in an apartment in an urban area. This is because those people want to live in a rural environment in order to take advantage of what those particular locations can offer. This will continue to place demand on the growth of countryside living opportunities in areas which include versatile soils or other important features that built development must avoid. Such demand is likely to increase conflicts with the recently issued National Policy Statement for Highly Productive Land.

3.14. The FDS does not acknowledge that the approach of compact and contained settlements can and must apply in rural locations such as in Franklin, and as required by the RPS and NPS-UD. Those statutory documents do not limit the Council to only providing an urban strategy for metropolitan Auckland. The same approach for compact, contained and vibrant settlements needs to apply to rural and coastal towns and villages. This is because it remains important for these settlements to build a sufficient critical mass and scale that then enables them to be more self-sustaining and vibrant.

3.15. Expanding existing towns and villages so that they are more self-sustaining and in a way that supports their existing communities and their future residents is an important way to remedy known shortfalls. The alternative of these settlements being just 'commuter suburbs' would be unacceptable because that would disable, rather than enable, people from selecting from a range of lifestyle choices to suit their individual needs. It would also not be an effective way of managing adverse effects on the wider rural environment.

3.16. While compact, contained and vibrant communities can be provided in urban Auckland, it is the unique setting of rural communities which attracts people to live in locations such as Franklin. The level of housing demand in such rural locations cannot be simply turned off without affecting other matters such as highly productive land. A better outcome is to therefore provide alternatives to using latent potential in rural zones and slow down the market demand for countryside living. Rural and coastal towns and villages must therefore be enabled to growth and develop in order to provide a substitute for countryside living demand and therefore provide people with more sustainable lifestyle option.

3.17. On this basis, the FDS needs to recognise that a 'one size fits all' growth solution is inappropriate. It needs to acknowledge that there are different solutions based on different contexts which means that it needs to provide for the full spectrum of metropolitan urban, town and village living opportunities.

3.18. For these reasons, Ngāti Te Ata's evaluation is that the FDS is inequitable because it does not recognise the overarching purpose of the RMA which is stated in section 5 as managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being, and for their health and safety.

3.19. Ngāti Te Ata does not interpret section 5 to mean that only select urban metropolitan areas within the Auckland region are enabled to grow in response to a growing population and varied lifestyles. Rather, it is considered to mean that all people and communities must be provided with options that enable their general well-being to be realised.

4. Relief Sought

4.1. The FDS must be amended to specifically enable the managed and continued growth of rural and coastal towns and villages to meet the demands of people wishing to live in and contribute to rural communities.

4.2. The Ngāti Te Ata consider that there is benefit in further growth opportunities at Clarks Beach. This view has been been acted upon to some degree with the confirmation of a special housing area at Clarks Beach, of which approximately half has been developed.

5. Submitter Contact Details



Future Development Plan 2023 #8594

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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

Please see attached submission

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

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

Tell us why

Other feedback

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

Please see attached submission

NGATI TE ATA

"Ka whiti te ra ki tua o rehua ka ara a Kaiwhare i te rua"

Roimata Minhinnick & Ngāti Te Ata

Submission on the Draft Future Development Strategy 2023 – 2053

To:
The Planning, Environment and Parks Committee
Auckland Council
Email: futuredevelopmentstrategy@aucklandcouncil.govt.nz

31 July 2023

Ngāti Te Ata are the Mana Whenua of Waiuku

1. This submission is provided by [redacted] and is also on behalf of Ngāti Te Ata. [redacted] has provided a more general submission on the Draft FDS for Ngāti Te Ata and my submission is mainly focussed on the growth and development of Waiuku.

2. Ngati Te Ata have been living in the in the south-west part of Tamaki Makaurau for a thousand years. The Te Pae o Kaiwaka Pa, today known more commonly as Waiuku, was the principal pa of Ngāti Te Ata, where our founding ancestor Te Ata i Rehia resided and subsequent leading chiefs of the Iwi. The identity of Waiuku and its surrounding environment is synonymous with Ngāti Te Ata.

3. Waiuku had a prosperous trading era in the 1840s through missionaries then into the 1850s, and over 300 canoes plied the waters of the Manukau trading different resources. The Waiuku Isthmus was a vibrant commercial hub that grew to meet the social, economic, and cultural needs of mana whenua and the new settlers. There was a level of autonomy and aligned aspirations of Ngāti Te Ata and the first settlers to prosper from the abundant resources of the natural environment.

4. However, as part of the land wars in the Waikato, the military invasion and confiscation of over 100,000 acres of Ngāti Te Ata land in the area, crippled our economy and people's livelihood. This tragic history, for which redress is still being sought, should not be forgotten by decision makers, including the Auckland Council.

The negative impacts of past Triti breaches are properly acknowledged in the Draft FDS (page 18). The devastating impact of that early period of colonisation had significant effects on the wellbeing of Ngāti Te Ata. Appropriate development opportunities for Ngāti Te Ata, in is own rohe, is essential to reverse the negative historical impacts on our people by empowering our Iwi members to provide for themselves, and their whanau.

5. In a contemporary context this means that Ngāti Te Ata need to be able to exercise our Triti guaranteed rangatiratanga over traditional places of residence, like Waiuku, where our people once flourished. Improving the wellbeing of our people has not changed as a priority goal. That wellbeing depends on having access to services, employment, education, housing, and cultural opportunities. Regrettably, being of a generally lower socio-economic disposition, if opportunities are limited, or rationed, it is our people that usually suffer first.

Waiuku Should Be Allowed To Grow

6. It is for the reasons above that Ngāti Te Ata is deeply concerned with proposed growth management scenarios for "rural towns" which is assumed to include Waiuku. It is noted that a keyword search over the whole Draft FDS pdf, did not identify any specific references to Waiuku. This is of some concern as it appears that the merits of the growth of Waiuku, as a significant town with its own unique identity, has not been specifically addressed. Waiuku needs to be able to grow and change to be a well-functioning urban environment for our Iwi and the wider community.

7. It appears that Waiuku is assumed as being included in the generic reference to "rural towns", or more worryingly, is identified (purple colour) as a "rural settlement" in the Figure 14 Plan on page 51 of the Draft FDS. To call a town of over 10,000 residents a "settlement" is a miss-classification. If Waiuku was in the neighbouring Waikato District, it would be the biggest town with nearly 2000 more residents than Huntly. Waiuku is the second biggest town in Tamaki Makaurau.

8. The rural section in the Draft FDS, (4.2.3), rightly discusses the need for "rural resilience" in its "economic and social dimensions" (page 43) and the need for rural areas to survive and adapt. However, this section ignores the dependence that primary producers have on rural service towns, and there is no mention of how Waiuku contributes directly to the horticultural and agricultural sectors. Workers need affordable houses to live locally to avoid long commutes and because the primary sector cannot afford to pay urban levels of wages. Retired farmers want to live in their local town. Growers need schools for their children, business services, and plant and equipment suppliers.

9. Iwi are very concerned that either a cap, or significantly limiting greenfield growth of our town, is being considered by the Council. In Figure 3 on page 33 of the of the Draft FDS, Scenarios A and D limit the extent of "rural towns" and villages to current levels. Any scenario that limits the growth of the town that services our people, and over which we have mana whenua responsibilities, is strongly opposed.

10. On page 16 it states: "Growth in rural area will be minimal to retain the rural environment and rural productivity". If this is one of the reasons for scenarios that cap growth in Waiuku, this is inconsistent with other parts of the Draft FDS that say that growth will be focussed on "existing settlements". Waiuku is one of the oldest settlements in the Region and expansion of this established community should be distinguished from more general rural growth such as rural residential living, which would affect rural production more than modest expansion of the existing urban area.

11. Ngāti Te Ata understand the concerns about soils and food production, but a balance needs to be struck. Waiuku does have reasonable soils, but they are not as good as the soils to the west of Pukekohe, for example. Also, commercial agriculture and horticulture has significant adverse effects on the mauri of the whenua and wai in our rohe. From an environmental perspective, and the impact on our values, it should not be assumed that enabling primary production, at the expense of providing homes for our people, meets the needs of Iwi. Aotearoa produces enough kai for many times its population, and while food it is unfortunately getting more expensive, it is having access to affordable, safe, and healthy homes, that would be of most benefit to Ngāti te Ata.

12. Therefore, to stop Waiuku from growing, and providing housing and the ability of Ngāti Te Ata to exercise our rangatiratanga and kaitiakitanga, once again, would in my view be a breach of Te Tiriti o Waitangi. It would fail to recognise our traditional and cultural relationship with the land, waters and other prised taonga, throughout the Waiau Pa district.

Draft FDS Does Not Fulfil Triti Obligations, NPD-UD and is Inconsistent

13. The Draft FDS policy for Waiuku effectively denies Ngāti Te Ata the ability to exercise its rangatiratanga, kaitiakitanga and related aspirations and needs. Therefore it fails to comply with the Resource Management Act, s6, (to recognise and provide for our traditional and cultural relationship to lands and waters of significance at Waiuku), s7 (to exercise kaitiakitanga i.e. to have an ongoing meaningful presence in the area) and s8 (to give effect to the principles of the Treaty of Waitangi as in a real and genuine partnership as opposed to a policy imposed on us).

14. Furthermore, it should be noted that sections 6,7 and 8 of the RMA are matters of national importance and therefore in my view, they should take precedence over any FDS that is developed at a much lower level in the planning hierarchy.

15. It is noted that decisions on the final FDS will be a "planning decision", and Objective 5 of the NPS-UD requires the FDS to take into account the principles of the Treaty of Waitangi. Regarding the policies to implement this objective:

> ***Policy 1****: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*
>
> *……. and*
>
> *(ii) <u>enable Māori to express their cultural traditions and norms</u>;*

> ***Policy 9:*** *Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:*
>
> *a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and*
> *b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and*
> *c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and*
> *d) operate in a way that is consistent with iwi participation legislation.*
> (emphasis added)

16. It is submitted that regarding the growth of Waiuku, the consultation with Ngāti Te Ata has not been adequate to meet the requirements of the NPS. Furthermore, we have not been approached so that the values and aspirations for urban development of our town can be taken into account. We are stating very clearly in this submission that our values and aspirations for urban development, as mana whenua, will only be met if Waiuku is allowed to grow in a similar manner to other rohe in Tamaki Makaurau. With appropriate controls the adverse environmental effects of growth can be managed.

17. What is also very concerning is that the Draft FDS is in our submission inconsistent. In section 2.1 it purports to be acknowledging obligations under Te Triti o Waitangi, and Ngāti Te Ata are rightly acknowledged as an Iwi. Then in section 2.2 the Draft FDS purports to summarise hapu and iwi values and aspirations for urban development. Section 2.2.1 has a list of values including rangatiratanga, mana motuhake, mataranga Maori, kaitiakitanga and manaakitanga. Section 2.2.2 outlines aspirations for urban development and we agree with many of the issues outlined such as the need to improve the environmentally outcomes from urban development, address unaffordable housing and recognising Māori history, tikanga and values in the development process.

18. The concern we have is that if the growth of Waiuku is capped, or only can grow from infill, then none of these "aspirations for urban development" can be realised by Ngāti Te Ata on our own whenua, where it matters most. Denying opportunities in our own rohe is a breach of the principle of mana motuhake that the Draft FDS claims to recognise. For example, only providing "affordable housing", a recognised need, in the main Auckland urban area, which is over 20 km away, does not enhance the mana of Ngāti Te Ata and enable it to be kaitiaki for is resources. It also means that the Iwi cannot demonstrate manaakitanga in terms of providing for the essential needs of its own people, guests, and the wider community of Waiuku residents.

Preventing Waiuku from Growing is Inequitable

19. While, like all iwi, we have a diaspora of members throughout Auckland, Aotearoa and overseas, we consider it a breach of the Triti and our mana if our rohe is not able to grow and therefore provide for the needs of our people. We want our tamariki to see a future for them of obtaining good employment and housing in Waiuku. We want Iwi members that may have moved away, and lived elsewhere, to return with their skills and resources to support our main marae that is near Waiuku. Living locally in the community, and contributing to the iwi and the wider community, is the best way for our Iwi members to demonstrate "ahi ka" and build strong relationships with our whenua and enhance the mauri of the natural environment. This is not a choice for Ngāti Te Ata, but a duty and a significant responsibility.

20. Key principles of the Draft FDS include:

    - *"Achieving equitable growth and change*
    - *Disparities in our communities and investments are addressed*
    - *Bringing jobs and homes closer together"*

21. Waiuku is a relatively self-sufficient rural service town with strong local employment, including from the over 70ha Fernleigh light industry area (larger than Pukekohe), the primary production sector and the NZ Steel Mill. We need more housing to balance current and future employment growth and avoid people having to travel from houses in other area to Waiuku to work. This will allow communities to "live locally" and address "inequities" in employment and housing provision that exist across Tamaki Makaurau.

22. For the reasons outlined above, we are very concerned with the apparent general growth management approach of limiting or stopping growth in Waiuku in favour of more concentrated growth in places such as Pukekohe, Drury and existing urban areas of south and wider Auckland. Waiuku is the second biggest town in the Region and is twice the size of Warkworth for example. Warkworth is planned to quadruple in size and the mana whenua from that area will directly and indirectly benefit from the employment and housing opportunities that will be created from that growth.

23. We are not opposed to providing for more intensification of the existing urban areas, or growth in places like Warkworth, but do not see why Waiuku, a significant settlement, 20km away from any other sizeable settlement, should not be able to grow in the same way as the rohe of other iwi in the Region. There is no doubt that, for example, the urban growth of the central part of Auckland has in recent years, benefitted Ngāti Whatua, directly through Triti settlement land, and indirectly through educational, housing, services, and employment opportunities.

24. In preparing the Draft FDS, Ngāti Te Ata are not aware on having been consulted directly on the growth options for its rohe. It would have never agreed that Waiuku, its town situated on land that has been occupied for over 1000 years, should be prevented by Auckland Council from growing in an organic way to meet the needs of Iwi members and the local resident population. If growth is capped and insufficient

houses are built in Waiuku, house prices and rents will become even less affordable than they already are for our people. Our iwi members are probably the most vulnerable people living in the area, and will be the first to be pushed out, of our own whenua, and to other areas, if a reasonable level of growth is not provided. Or, worse still, forced to live in temporary accommodation in a place like Rotorua, and this temporary emergency housing is a disaster on every level.

25. The Draft FDS does support the development of papakainga housing on Iwi land, but we also need affordable housing in our town of Waiuku. Living in the urban area of Waiuku, a well-established existing town, provides accessibility benefits to our people that they would not obtain if living in housing on our Marae. For example, they would be less car dependent if living in a compact settlement like Waiuku and not at a marae in a rural location. Transportation is expensive and access to services, schools, and employment etc, can be a challenge for our whanau, and in a relatively small town like Waiuku, walking and cycling are viable options.

26. Regarding the types of houses that best suit our people, while we support infill terraces etc, they do not generally meet the needs of our people. We have larger families, often multi-generational, and more traditional standalone houses on reasonable sized sections will continue to be the most suitable for the foreseeable future. This is especially the case in a small rural town like Waiuku where we enjoy a more outdoor and sporting lifestyle. That is why Ngāti Te Ata need to have some greenfield development for new and affordable dwellings in Waiuku that our people can aspire to owning. This is no different to what Auckland Council has provided for in the rohe of every other iwi in the Region, with future development land, as far as we understand.

Infrastructure in Waiuku Will Help Protect Mana Whenua Values

27. It will be well known to the Council that Ngāti Te Ata, and the Minhinnick whanau, have been at the forefront of improving the standards of wastewater discharges and addressing other adverse effects on water quality, across the region. We remain concerned with development taking place in areas that do not have adequate protections for the mauri of freshwater and our harbours.

28. A key theme of the Draft FDS is to integrate landuse and infrastructure planning and to utilise 3 waters capacity as efficiently as possible (Principle 2(b)). Regarding infrastructure servicing in Waiuku, this well-established township can service more growth. A significant commitment has been made by the Council and Watercare to upgrade the current wastewater treatment for Waiuku and neighbouring settlements. Ngāti Te Ata have been intimately involved in the planning of the South-West Wastewater Upgrade and a plant site has been recently secured. This planned infrastructure can service greenfield growth for Waiuku and will be a state-of-the-art system and we have advocated for a very high standard of discharge quality.

29. New connections from greenfield development will help pay for this significant public/ratepayer investment, so that additional much needed upgrades can be funded. Principle 3(b) is to “make the best use of existing infrastructure” and allowing growth

in Waiuku to benefit from committed infrastructure investment will achieve that principle.

30. Regrettably, poor quality wastewater discharges and sewerage overflows are all too common across the region, including into the Waitemata from Meola creek. While this will be reduced with the Central Interceptor, the problem will continue due to the combined historical network and infiltration. Urban growth in Waiuku will therefore most likely have less adverse effects than in many parts of Tamaki Makaurau, so it should not be excluded from growing. The mauri of wai is of great concern to mana whenua, and development should be directed to towns as settlements that best protect our taonga. Waiuku will be a settlement that can accommodate growth while maintaining the health of natural and physical resource and Iwi values.

Conclusion

31. It is imperative for the people of Ngāti Te Ata that the mana of Waiuku and its wider rohe is upheld, acknowledged, and respected, and that we can demonstrate rangatiratanga by influencing decisions over the management of growth on our ancestral land and taonga. Ngāti Te Ata have responsibility as kaitiaki to fulfil their obligation and responsibilities to the environment in accordance with customs passed down, and to be accountable to the people (current and future generations) in these roles as custodians. Just as our tupuna strove to provide opportunities for the current generation, to live and thrive, in Waiuku, we must do the same for our tamariki and their tamariki.

32. Greenfield growth in Waiuku will provide benefits for our iwi including making housing in Waiuku more affordable and providing more housing choice, including for aged and retired people, and our kaumatua. If housing is in short supply, we know that it is usually our people that are the first to experience housing hardship. We want our mokopuna to have the opportunity to live and work in Waiuku, and not be forced to live elsewhere, so that they can contribute to their marae and local community.

33. There is now wide recognition that colonisation has deprived Māori of autonomy, essential resources, and opportunities, and that has caused on-going issues for our people. The way to address that is to enable iwi to exercise rangatiratanga and to be kaitiaki, and implementing such principles is now a statutory requirement. In this historical context, Ngāti Te Ata is particularly concerned that the Draft FDS is suggesting, as an option, that Waiuku (assuming it is a "rural town") not be allowed to grow in a similar manner to every other part of Tamaki Makaurau. A lack of growth in its rohe will remove opportunities for services, employment, and houses, that would otherwise occur.

34. Therefore, suppressing growth, and the opportunities it provides for our Iwi, in our rohe, and enriching other areas/communities, by enabling their growth, is arguably just an extension of an extractive "colonial" strategy. Ultimately it undermines the ability of Ngāti Te Ata to enhance their social, economic, and cultural well-being, on their own whenua, as has occurred in the past. More of our people will be forced to

live elsewhere, not contributing to, or having a regular relationship with, their home marae, because of a lack of opportunities in their tribal area.

35. Stopping greenfield growth in Waiuku, and only providing for infill, will effectively "cap" Waiuku's future, and cause adverse impacts such as making houses even less affordable. Such a planning outcome is therefore considered to be a breach of statutory obligations to Ngāti Te Ata under the Triti. It is also inconsistent with those parts of the Draft FDS itself, that claim to be acknowledging the values of hapu and iwi, and taking their interests into account, as is required.

36. Waiuku needs to be able to grow and change, including greenfield expansion, to be a well-functioning urban environment for our Iwi, and the wider community.

37. I and Ngāti Te Ata wish to be heard to speak to this submission (and the more general one), and in support of allowing Waiuku to grow and flourish, to improve the wellbeing of Iwi members and the wider community.

[redacted]
Ngāti Te Ata

31 July 2023

Ngāti Te Ata
PO Box 437
Pukekohe
[redacted]
[redacted]

Future Development Plan 2023 #8596

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

Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

Accessible local centres

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

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

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

Other

Tell us why

It is better than expansion, and all our local centres should be seeing intensification,

so it's good to focus on those that need the most regeneration. However, the Strategy provides insufficient focus on how to improve the entire existing built area.

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 refer the attachment



All Aboard Aotearoa Inc

Submission on the Future Development Strategy

31 July 2023

To: Auckland Council

Thank you for the opportunity to submit on the draft Future Development Strategy.

Help us Shape Auckland's Future Growth

Submission on the draft Future Development Strategy

Our Details: All Aboard Aotearoa
First Name: Heidi
Last Name: O'Callahan
Email address: info@allaboard.nz
Local Board: N/A as we are a citywide organisation

This submission is on behalf of the organisation All Aboard Aotearoa.
I confirm I have the authority to submit on behalf of this organisation.

Questions

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

Agree.

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

Other. It is better than expansion, and all our local centres should be seeing intensification, so it's good to focus on those that need the most regeneration. However, the Strategy provides insufficient focus on how to improve the entire existing built area.

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

Agree

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

Agree

5. **Do you have any other feedback?**

Yes. Our feedback is below.

The ***direction*** of this Future Development Strategy is good:

> *There will be less reliance on expansion into future urban areas and what growth there is will be phased over a longer timeframe.*

We are also pleased the Council is addressing the problem that private plan changes are effectively "driving the strategy".

However, we have a number of concerns about the strategy:

1. The timing is overdue
2. The scale and pace of change is inadequate
3. Deliberative democracy is needed for land use planning
4. Critical changes to the strategy are required

1. The timing is overdue

Council declared a climate emergency in June 2019, and needed to address the problem of urban expansion immediately.

However, during these four years since the emergency declaration, Council has created barriers to creating a quality compact city. The cross-party housing accord on the NPS-UD and MDRS was an unprecedented opportunity for Council to stand strong with both major political parties, revise the AUP to halt urban expansion, fix some of the regulations preventing quality regeneration, and create transformational change in our land use planning.

Council wasted this opportunity by directing staff to use biased methods to map colonial "character" — a move that restricted intensification potential significantly. This left staff little time to improve the AUP by resolving how to restrict expansion, nor to add quality regulations, universal mixed-use zoning, a better urban form with lower site coverage and taller buildings, reduced car domination and other issues that would set Auckland's development on a climate-resilient path. Council hasn't even answered a question we posed about vehicle crossings in October last year:

> *Why were there no substantial amendments to the AUP proposed in PC78/PC79 for vehicle crossings — such as requiring new developments to use consolidated carparking, or to rule out designs that have a high saturation of vehicle crossings? — Email from Heidi O'Callahan to Celia Davison*

This has stifled our climate response, damaged the civic conversation, and increased danger to our children and future generations. Council needs to use this review of the development strategy to mitigate this loss of four years' progress, and get our climate planning back on track.

2. The Scale and Pace of Change is Inadequate

We approve of the draft Strategy's vision:

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

To realise this vision, however, the draft Strategy needs to genuinely enable the delivery of the Climate Plan and TERP. These Council-approved plans describe **how** to deliver our commitments to greenhouse gas emissions reduction. The TERP says:

> *To meet the target, Auckland cannot rely on incremental change; it needs transformation…*
>
> *Auckland's emissions goals can only be achieved through a complete transformation of the transport and land use planning system. — TERP*

This draft Future Development Strategy does not attempt a complete transformation of the **land use** planning system. It is only incremental.

This internal inconsistency at Council means the draft Strategy cannot deliver its own vision.

At the same time, Auckland Transport is also not attempting a complete transformation of the **transport** planning system.

In order to mitigate AT's laggard performance, Council now needs to pull every development lever possible to deliver the Climate Plan and TERP. This requires bringing action forward. For example, the TERP says:

> *1. Land use decisions undermine emissions reduction goals*
> *Progressively refocus funding from growth in new urban areas to supporting investments that more effectively promote mode shift in the existing urban area.*

The term "progressively" must be interpreted to mean "as quickly as is required to deliver our commitments to greenhouse gas reductions". Council has provided no evidence that the pace of change in the draft Future Development Strategy will achieve this.

Nothing has higher priority than delivering our climate commitments (equitably). Any excuse of elevating economic or social goals for current generations over delivering our climate commitments is both shallow and untenable. We have a responsibility to both current and future generations. Enabling future generations to realise their own economic and social goals relies on us ensuring we deliver our climate commitments.

3. Deliberative democracy is needed for land use planning

Generations of Aucklanders have witnessed our growth being accommodated through expansion, and many will not question the practice. Even though stopping urban expansion would improve our collective finances, environment and wellbeing, most Aucklanders barely give the idea a thought. Conversely, those individuals and companies who make money from sprawl are motivated to submit against progressive changes and to influence the civic discussion.

And yet, a transformational change in planning is required, and has been approved by Council as part of approving the TERP. Given the scale of change required, land use planning needs an informed, constructive and deliberated Council-led discussion.

The draft Strategy is about both "***climate action***" and "***transport decision-making***", so it's a perfect example of where the TERP recommends deliberative democracy:

> *11.1. Enable deep and ongoing dialogue with Aucklanders on **climate action***
> *11.1.2. Transform engagement processes to better enable citizen participation in **transport decision-making**, using participatory models such as deliberative democracy – TERP*

We appreciate the moves taken towards better democratic decision-making in the wider transport sector (eg on funding transport by the Ministry of Transport) and in the wider Auckland Council umbrella organisations (eg by Watercare and by Council for the VKT Reduction Plan).

With land use planning, it is not the job of the public to balance the submissions from vested interests. Rather, Council has the legislative responsibility to plan for future generations. Our collective well-being must inform what Council should do, not fear of well-moneyed backlash.

For this draft Strategy, we hope the results of the consultation will be interpreted appropriately: as a source of information to add to what Council knows, rather than any kind of poll, which it is not. In future, we believe Council should use deliberative democracy in creating development strategy.

4. Critical changes to the strategy are required

Change 1: Stop all Expansion

The Strategy gives excellent reasons why expansion should be stopped, including:

> *In general, urban expansion and greenfield development is likely to produce more emissions than existing urban development…*

> *Adding additional growth at the fringes of our existing networks is the least cost-effective investment in infrastructure to support growth. The best return on investment is closer to the centre… — FDS*

We cannot afford expansion. We certainly shouldn't be loading its enormous costs onto our children and future generations. And the added emissions are destructive in the short, medium and long term.

It is therefore inconceivable that this Strategy proposes continued expansion, particularly as no climate-appropriate justification has been supplied. The reasons given for continuing to expand are entirely unsupportable:

"Demand for residential land": Council can slash demand for new residential land by significantly increasing the development capacity in the existing urban area.

"Demand for business land": Council claims we need ***1400 hectares of new business land in greenfield areas***, yet this has been calculated on the assumption that economic growth for the land-extensive industries (which are considered part of Manufacturing, Transport and Construction) will roughly match population growth.

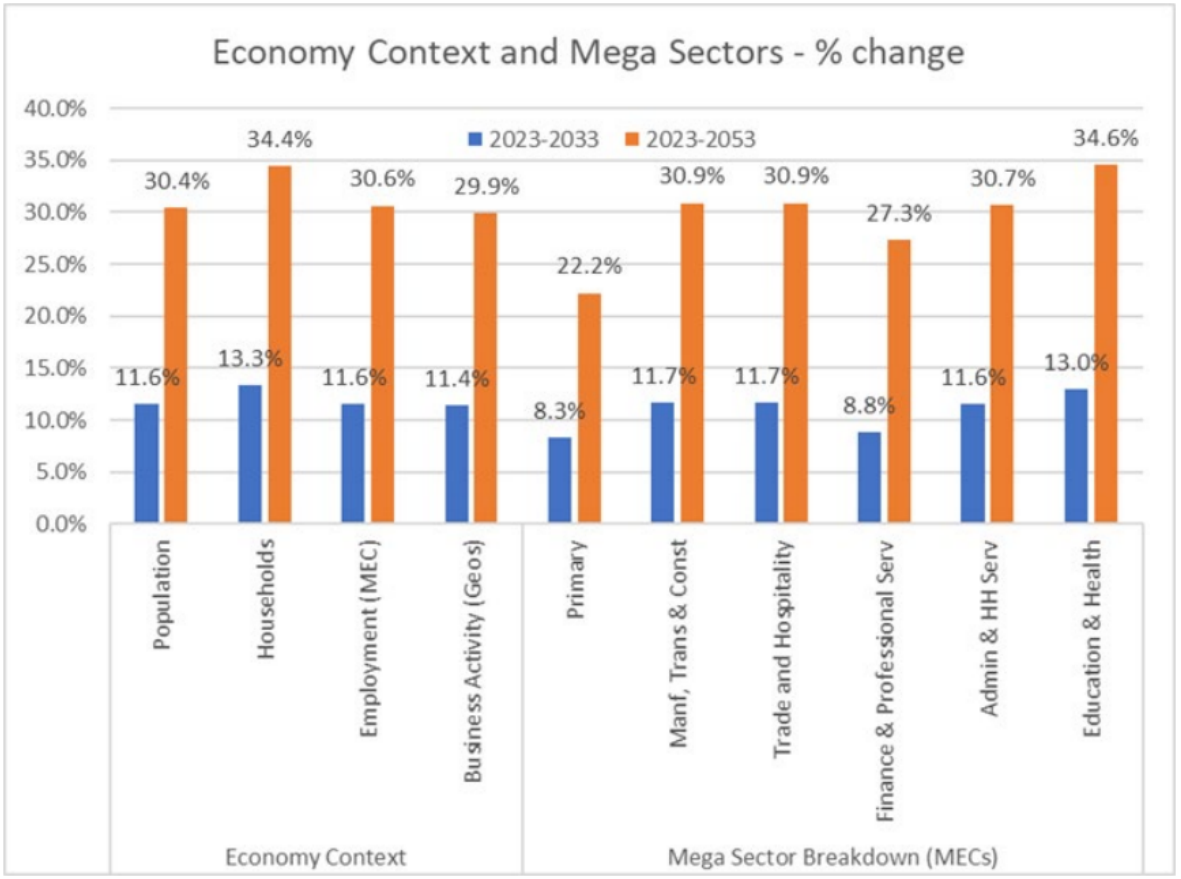


Figure 9 - Expected proportional growth in the economic context and proportional growth in different sectors

This is a gross departure from Te Tāruke-ā-Tāwhiri, Auckland's Climate Plan (TTT), which says we will achieve a regenerative economy:

> *Kaitiaki values guide our economy*
>
> *A regenerative economy underpinned by the ethic of kaitiakitanga ensures that **natural resources are extracted at a rate that they can be replenished**. Embedding these principles in our economy is increasingly important as we better understand the finite nature of our natural resources and the implications of exceeding our planetary boundaries. — TTT*

Council's claim of a high demand for business land in greenfields areas is not accompanied by evidence such as:

- A stocktake of industrial and commercial sites where the land is being used poorly (eg with extensive carparking). This is land that is potentially available for "land-extensive industries";
- A granular analysis of the potential for some industrial and commercial businesses to adopt multi-story practices as is done in some international cities;
- An analysis of how the "land-extensive industries" will adapt their land use practices in response to a nation-wide climate-appropriate land use strategy, ie if they are unable to migrate to new sprawl elsewhere.

Land is a ***finite natural resource*** that Council is proposing be "extracted" at a rate that ***cannot be replenished***. Council needs to upskill rapidly here if we are to create "a regenerative economy."

Council's claim for a need to expand stems from a paradigm of planning and economics that was formed during the era of Auckland's fossil-fuelled expansion. Professionals are expected to keep abreast of developments in their field.

Referring to Figure 13, Council needs to remove from the Future Urban Area all urban expansion, including:

- Land Council has proposed for removal from the Future Urban Area.
- Land Council has recommended for "further investigation"
- Land Council has labelled "TBC"
- Land Council has proposed live zoning in future, whether for 2025 or beyond 2050.
- Land Council has already live-zoned but is not yet developed.

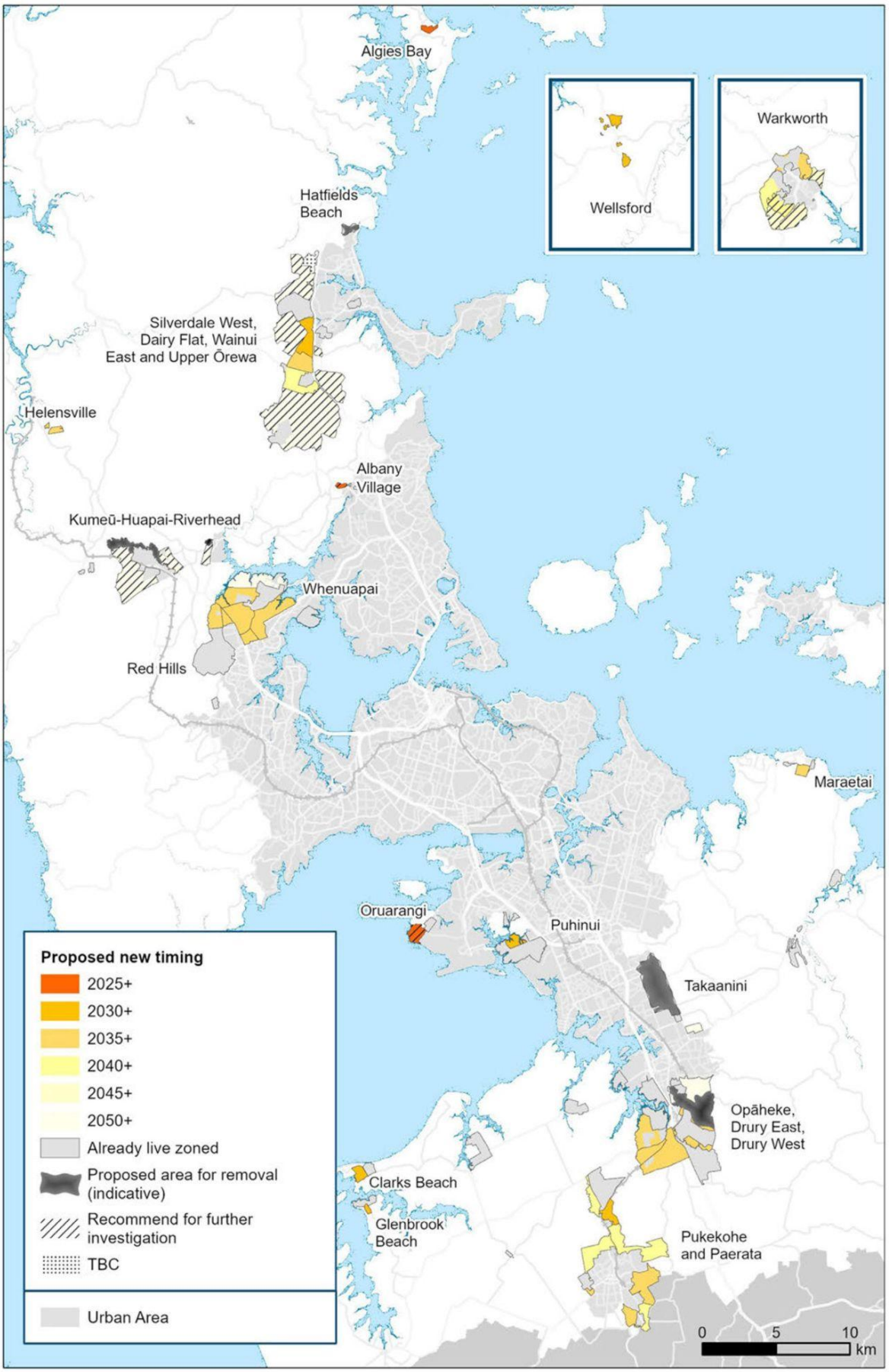


Figure 13 – Future urban areas

Change 2: Supercharge Walking and Cycling

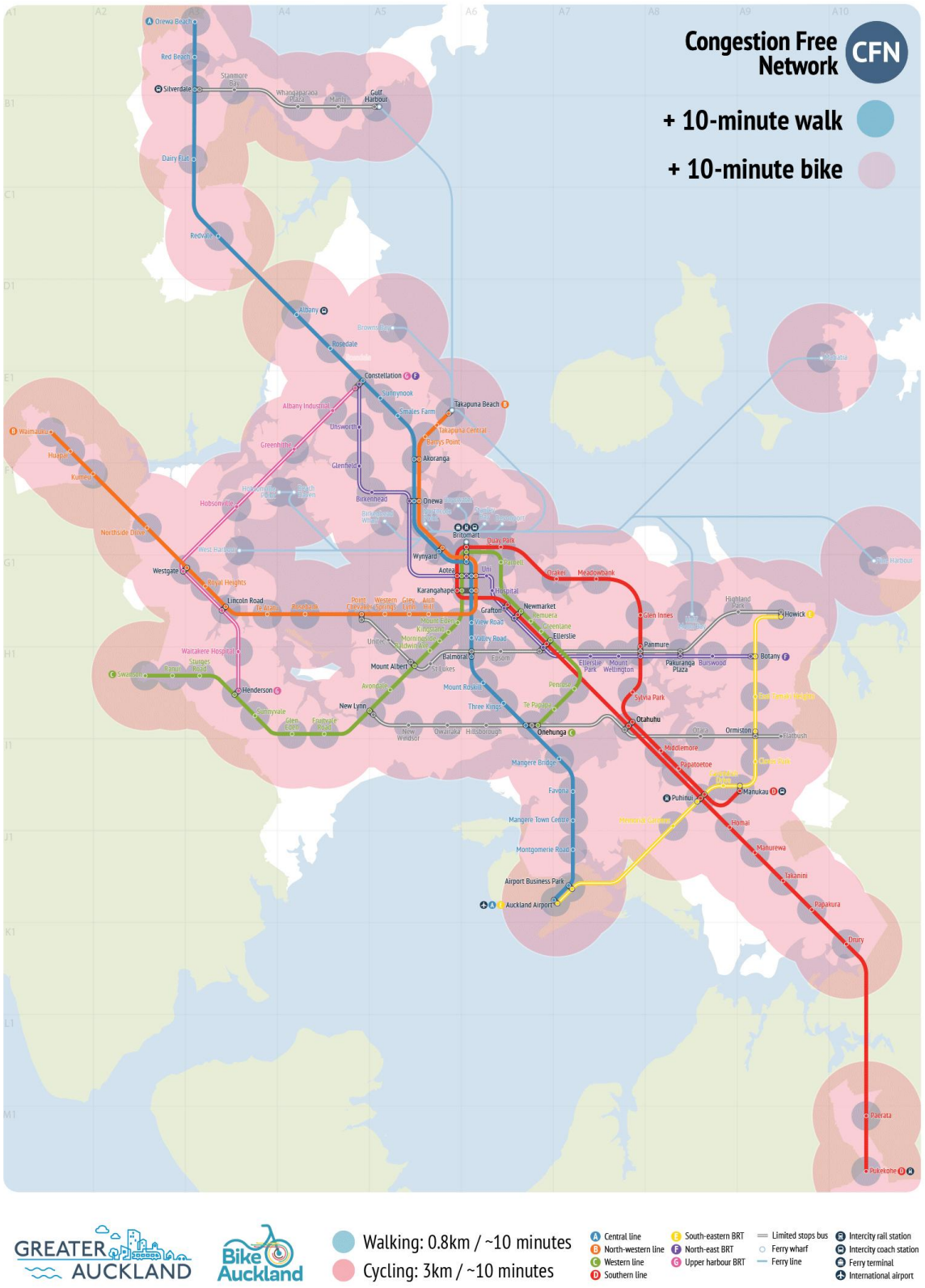
The development strategy is a critical part of delivering on the TERP, which aims to "Supercharge Walking and Cycling", and notes:

> *Auckland needs close to a ten-fold increase in passenger distance travelled via walking, cycling and micromobility by 2030. It is estimated about half of all trips less than 2.5km are made by car and about half of all car trips are less than 6km. Replacing car trips with walking, cycling and micromobility is a highly effective way to cut emissions quickly. A 6km trip is only 15 minutes by e-bike. — TERP*

We welcome the principle expressed in the draft Strategy:

> *Strengthen accessible, walkable and mixed-use neighbourhoods — FDS*

However, there seems to be little planning in the draft Strategy that acknowledges the importance of the bicycle in development decisions. It is several years since Bike Auckland laid push-bike catchments over Greater Auckland's map of the congestion free network:



An integrated network of train, light rail, and bus rapid transit lines to let Aucklanders travel around the region without being in traffic.
Developed by Greater Auckland by combining and extending projects identified by the Auckland Transport Alignment Project. This map includes modification of artwork originally published by Auckland Transport and the New Zealand Transport Agency.

E-bikes are already allowing people to go much further than push-bikes. We need safe streets to keep these people safe, and to encourage more people to travel this way. Yet the draft Strategy doesn't even include the words "e-bike" or "bike".

A good development strategy would focus on shifting investment away from highway and corridor expansion to projects that create:

- An entire city of low traffic neighbourhoods (LTNs) bounded by
- A complete network of safe, separated cycle lanes on the streets (arterials and connectors) that bound the LTNs
- A complete network of walking paths and footpaths, with safe pedestrian crossings at frequent spacing, improved surfaces and lighting, and unimpeded by vehicles and conflicting uses
- An improved network for buses, provided via bus priority at intersections, modal filters, moving bus stops at transfer points closer together, and by implementing bus lanes wherever there is room within the corridor in excess of the above walking, cycling and micromobility networks.

Most of this can be provided tactically over just a few years, and improved with permanent materials through the renewals programme.

Importantly, this means that enabling quality car-light intensification should be part of our development strategy across the ***entire*** existing urban area.

Change 3: Move the Nodes

The draft Strategy proposes to keep nodes at Warkworth, Albany, Westgate, the City Centre, Manukau and Pukekohe. All these locations need people-friendly improvements, better regulations and mixed-use zoning – but to reduce emissions and ongoing costs, ***growth*** must be in the existing urban area, and mainly located on the isthmus, which can provide all the capacity we need.

On the North Shore, mixed use development and improved streets can enable local living for local people, with employment, shopping and recreation. This will reduce travel distances and make the city more liveable. If a node is needed, it should be centrally located — Wairau Park, Glenfield or Constellation Drive, for example — not in Albany where half the catchment is rural. Albany is a node that serves sprawl, not intensification.

In the West, mixed use development and improved streets and transport connections can similarly improve the area. If a node is needed, it should be at Henderson. Not in Westgate where half the catchment is rural. Westgate is a node that serves sprawl, not intensification.

Referring to Figure 10, which demonstrates urban expansion (and makes a mockery of the “quality compact city strategy”) it is clear that Council’s approach needs an overhaul. The nodes at Warkworth, Pukekohe, Albany and Westgate should be removed, and the focus should be shifted entirely towards regeneration, intensification and better basic planning for public transport, walking, cycling and micromobility, throughout the existing urban area.

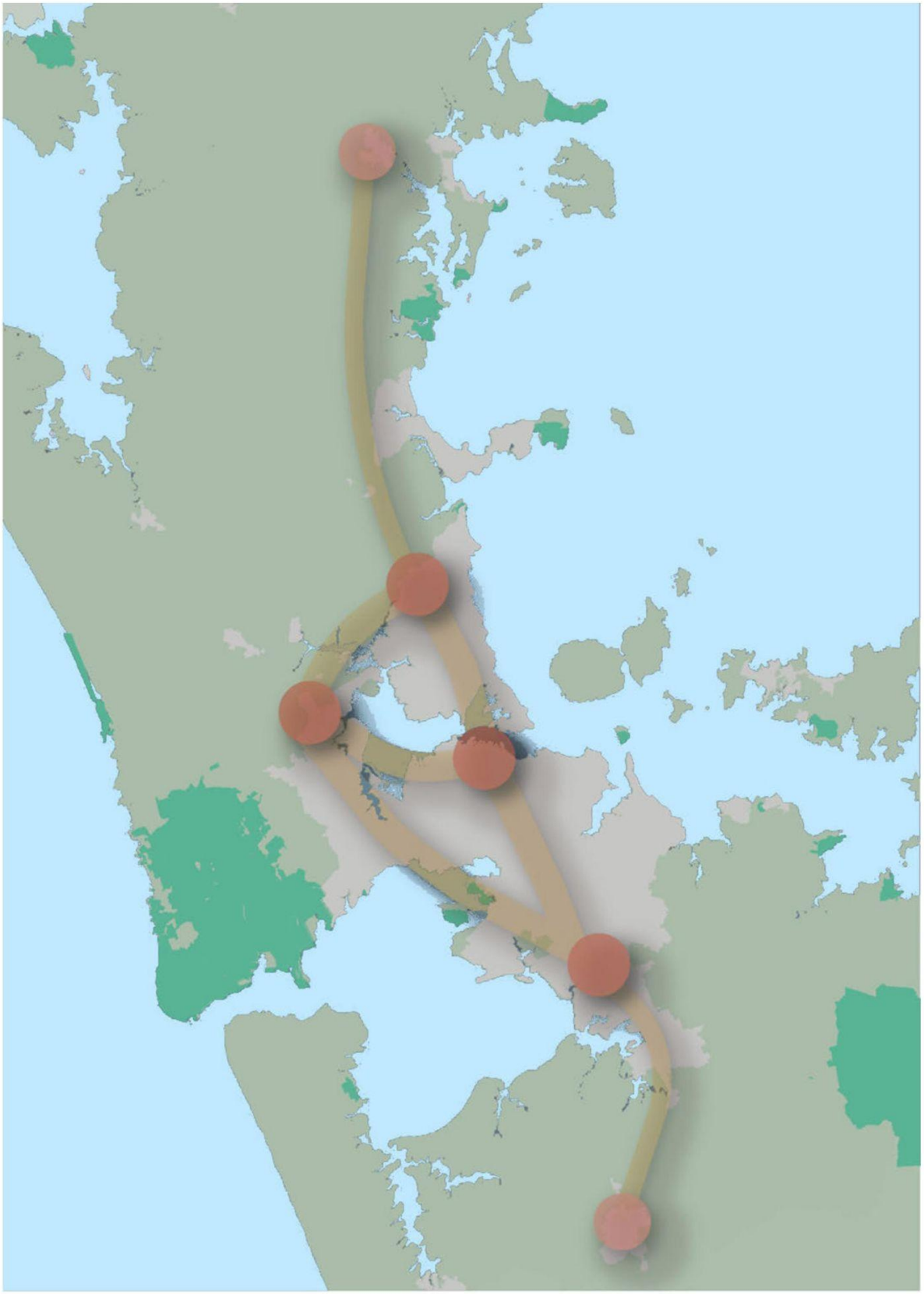


Figure 10 - Multi-nodal model

Change 4: Remove the misinformation about short-term impacts of development

Council's justification for their expansion plans is misinformed:

> *additional growth will have limited influence over travel patterns and behaviour over the next 10 years. – FDS*

This needs to be corrected as follows:

> *Additional growth has significant influence over travel patterns and behaviour over the next 10 years. Where the growth is located determines outcomes.*
>
> *Urban expansion increases the distances people must travel for all kinds of trips and makes people reliant on a car for more of the trips they take. Conversely, intensification increases proximity to all sorts of destinations, both reducing distances and encouraging mode shift away from driving.*
>
> *Over the next 10 years therefore, a **significant reduction** in overall vehicle km travelled (VKT) and emissions can be achieved through an improved development approach. — AAA suggestion*

To explain: Our existing urban form will continue to shape how far people will travel, and is why the city mustn't sprawl any further. Despite this, the Transport Emissions Reduction Pathway (TERP) still found average trip lengths can be reduced by 10% by 2030 (from +5% to –5%) as a result in development changes:

> *reduction in trip length possible through smarter neighbourhood design and intentional, transport-oriented development. – TERP*

We expect to see the draft Strategy corrected on this. If we can reduce trip lengths **by 10% over 7 years**, that means our development strategy has **a large influence over the next 10 years**; not a limited one.

Change 5: Focus more on Equity

The draft Strategy acknowledges that:

> *Historic growth patterns and hard and soft infrastructure investment, or lack thereof, have resulted in **inequitable levels of accessibility** and the distribution of goods, services, employment and resources.*
>
> *How and where we grow, change and invest must address these disparities…*
>
> *Investments are prioritised in the parts of the region that need it most – to address disparities and serve communities of greatest need.*

Although the intention is good, the draft Strategy hasn't yet adequately addressed these disparities.

In all Auckland communities, there is one group of people that is consistently disadvantaged, across all demographics regardless of socioeconomic, physical ability, ethnic, educational or geographic differences.

This group of people is our **children.**

The draft Strategy doesn't include the words:

- "Children"
- "Child"
- "Young people"
- "Youth"
- "Rangatahi"
- "Mokopuna"
- “Tamariki” except once, in a section talking about “aspirations”

The lack of language about children points to a systemic exclusion of consideration for children’s needs in developing the strategy.

The draft Strategy doesn’t address the lack of access that children have throughout all kinds of areas: residential, low-density suburbs away from centres, retail, educational, recreational, industrial and commercial areas.

The draft Strategy, as proposed, will mean many children will miss out on improvements due to a misconception at Council about the emissions reduction potential in typical Auckland suburbia. The draft Strategy says:

> *Less focussed and scattered intensification, such as that enabled by the MDRS, is not effective in reducing [vehicle km travelled (VKT)] and therefore transport emissions. – OER*

This needs to be corrected as follows:

> *Intensification is a critical part of “retrofitting the lower-density suburbs” (TERP) to be integrated into plans to deliver our greenhouse gas reduction commitments equitably. Bringing new homes and a variety of mixed uses into suburbs that are currently low density, far from centres, car dependent and barren of amenities improves options for residents for trips of all kinds — including for children to visit friends and a range of destinations.*
>
> *To **fund** “the creation of healthy, accessible and equitable neighbourhoods, predicated on enhanced walkability and improved cycling access,” (TERP), the rating base of these low-density neighbourhoods needs to be increased. This can only be achieved equitably through intensification. — AAA suggestion*

To explain: Council needs to acknowledge that, both to reduce transport emissions and to improve access for people of all ages, development is needed ***both*** near centres ***and*** in the low-density suburbs further away. As the TERP says:

> *Vibrant, mixed-use neighbourhoods for people across Auckland, where residents can easily access most of their daily needs by walking, cycling and PT. Building on the existing quality compact approach and continuing the trend to a greater diversity of land uses and an increased mix of housing typologies will* ***transform single-use residential and commercial suburbs into vibrant, mixed-use Neighbourhoods.***
>
> ***Cities across the globe have made this a key component of their efforts to reduce transport emissions****, with concepts such as Complete Neighbourhoods and the 15-Minute City being widely embraced. These ideas* ***focus on retrofitting low-density suburbs*** *into more healthy, accessible and equitable neighbourhoods, predicated on enhanced walkability and improved cycling access. – TERP*

In summary: the Strategy needs to focus more on what children need, and to bring improvements to children throughout the entire city.

Change 6: Divert Funding from Expansion Projects to Intensification Projects

We support the draft Strategy's narrative of:

> *investing primarily in existing urban areas, with a strong focus on aligning land use and infrastructure. — FDS*

Diverting investment funding from growth to existing urban areas needs to happen at the pace required by the Climate Emergency – ie immediately. Council seems to be prepared to reduce investment in sprawl only insofar as it eases short-term Council finance pressures; this approach is insufficient.

To *deliver our commitments to greenhouse gas emission reduction* (as per the Vision of the draft Strategy), Auckland Council needs to reject all expansion plans, including calling for a halt to the "Supporting Growth" programme wherever it supports growth in future urban areas and recently urbanised outer areas.

To act with integrity, in line with our C40 commitments, the Climate Plan and the TERP, Auckland Council's climate response requires the reversal of investment decisions on infrastructure that supports expansion in Drury, Pukekohe, Warkworth, the Northwest, Penlink and elsewhere. This needs to be made clear to Auckland Transport, Waka Kotahi, the Ministry of Housing Development, the Ministry of Transport, and other parts of central government.

The level of change required by the IPCC includes cancelling projects and departing from existing planning. Other countries are doing so, and so must New Zealand.

Change 7: Make Blanket Changes Across the City

We have a Climate Emergency which requires planning for urgent transformation. Travel patterns can shift very quickly if Council focuses on regenerating the entire existing urban

area, creating a safe, accessible, low-carbon urban form and transport system.
Cost-effective blanket planning changes are needed, such as:

- Low-traffic neighbourhoods rolled out across the city, including industrial and commercial areas
- Tactical streetscape transformations along the arterial streets, implemented through rafts of coordinated, small, cheap reallocation projects
- Improving the bus network so that it is more appealing than using a private car for the vast majority of trips throughout all areas of the city. This will require implementing VKT reduction strategies like LTN's, streetscape transformations, and properly pricing all elements of the driving network, including car parking.
- Revising planning regulations in all existing urban areas to allow and mandate urban forms which are greener and reduce car domination, such as **perimeter block housing (see below)**
- Urgent removal, reduction or pricing of every transport feature that encourages car ownership and prevents regeneration, walking, cycling and micromobility: parking (both public and private), vehicle crossings, large intersections
- Requiring Auckland Transport to reallocate space and, where required, change the traffic circulation patterns to create significant mode shift when delivering **all projects**, including **storm repair, renewals and improvements projects**
- Safe speeds (30 km/hr) as a blanket change across the city (except motorways)
- Funding many small transport projects over many areas rather than allow the funding to be hogged by a few megaprojects. The draft Strategy indicates this is the intended approach for nature-based solutions, but it is needed in transport, too.

Change 8: Swiftly Regulate to allow Perimeter Block Housing

Good planning can create a city that will be affordable for future generations ***and easy to intensify further***.

There is no place — not even in the lowest density suburbs furthest from centres — for development that makes intensification more difficult,such as:

- Backyard infill, which replaces green backyards with relatively few homes,
- Car-dependent sausage flats and townhouse development. This is better than backyard infill as it does at least provide more homes, so it prevents more sprawl, with a net benefit for green infrastructure. However, it still creates an environment dominated by paved areas, unsafe vehicle crossings, driveways and parking areas.

Instead of the above development types, our development strategy must be designed to create, on a site by site basis, a cohesive, low-carbon, beautiful and green urban form.

A city-wide urban form should be set according to a vision — in our case, what a "quality, compact city" actually looks like — and from that the regulations at individual site level should be developed. Instead, Auckland's city-wide plan has been created over time by developing regulations from concerns about sunshine onto or outlook from individual sites.

Council's inattention to this paradox means set-back, height and recession planes have been determined on the basis of change-averse individual property owners' ideas about shading and dominance. By creating regulations on the basis of these mistaken ideas, instead of on the basis of what would enable the development of a functional and beautiful urban form, Council has prevented the fulfilment of the rights of residents (current and future) to adequate housing and a climate-resilient, accessible, compact city.

The absurdity of the Council position is highlighted in the draft Strategy's Overall Evidence Report, where Council misdiagnoses the cause of tree loss:



Figure 10: Aerial images of recent urban housing regeneration showing loss of green space and tree canopy due to more intensive development. Left photo taken 2017, right photo taken 2022. Auckland Council.

This is certainly not an example of "intensive development". It is wasteful low-rise development that covers a lot of ground, created as a direct result of Council's regulations about recession planes, height limits and the ability to pave almost the whole property.

Council's attempt at resolving the loss of green infrastructure in the draft Strategy continues the misapprehension, with a recommendation that the AUP be changed to:

> *Strengthen protection of existing vegetation and encourage or require new planting and ecological connections – draft FDS.*

Council should instead fix the root cause of the problem, by including in the Strategy a recommendation that the AUP be changed to:

> *Allow perimeter block housing to develop, site by site, throughout all of Auckland, creating neighbourhoods of perimeter block housing, organised around gardens and greenery. — AAA suggestion*

This need not be politically hard to implement in the low-density suburbs; Council can stress that restricting development to the front half of sites only will prevent backyard infill, even as the side and front set-backs and recession planes are removed. If necessary, the heights allowed can be lower in low-density suburbs. Making this change means that:

- Backyard infill is avoided
- Green infrastructure is retained

- When further intensification is required, the regulations can allow for higher buildings
- The urban form will steadily improve, site by site, rather than steadily deteriorate.

Change 9: Remove reference to "trade-offs"

This wording in the draft Strategy is unhelpful, and should be removed:

> *As priorities change, **trade-offs** need to be made (and re-made) to ensure Aucklanders are getting the best value for money from infrastructure investment. — FDS*

The TERP talks of:

> *a significant change from **'trade-off'** thinking (where objectives are seen as in zero-sum competition with one another) to 'co-benefits' thinking where programmes are designed to maximise multiple objectives.*
>
> *Rather than necessitating **trade-offs** between emission reductions and other outcomes, a large body of research and empirical evidence demonstrate that many actions in the TERP would enhance multiple outcome areas (safety, health, network efficiency etc.). — TERP*

The draft Strategy needs to remove reference to "trade-offs". An appropriate statement mighty be:

> *Aucklanders can get the best value for money from infrastructure investment if development is focused on maximising multiple objectives, and enhancing all our outcomes areas together (climate, safety, health, network efficiency, etc) — AAA suggestion*

Thank you for reading our submission.

All Aboard Aotearoa Inc.