Future Development Strategy

Organisations

WRITTEN FEEDBACK
Volume 13

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

Future Development Plan 2023 #8615

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?

#8615

Ministry of Education

Presenting Key Issues
Draft Auckland Future Development Strategy

Land Investment & Planning Group

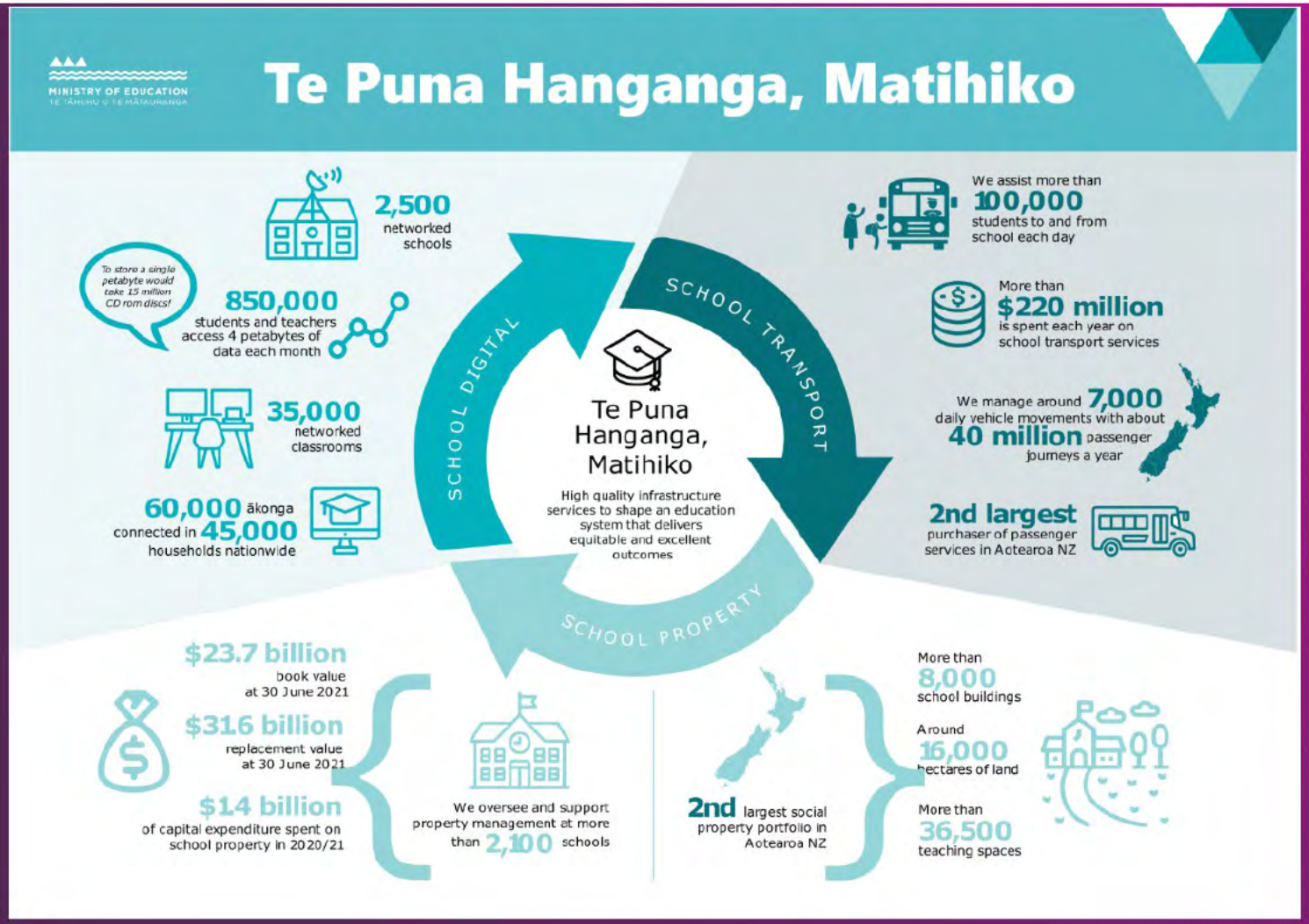
- [redacted] – Manager Spatial Planning
- [redacted] – Principal Advisor Spatial Planning

Friday 28 July

Te Tāhuhu o te Mātauranga
Ministry of Education

Te Tāhuhu o te Mātauranga
Ministry of Education

Why the Auckland FDS is important to MOE



Te Tāhuhu o te Mātauranga
Ministry of Education

Why the Auckland FDS is important to MOE

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National Education Growth Plan 2030

Auckland and Tai Tokerau

May 2019



New Zealand Government

MINISTRY OF EDUCATION

Auckland Plan

Education Growth Plan to 2030 | "Local students at local schools"

We are presenting a new way of thinking about and co-ordinating the Ministry of Education's response to population growth across New Zealand. The Auckland Education Growth Plan will ensure that sufficient capacity in the school network is delivered as the right type, in the right place, at the right time.

A Framework For Planning: Three Broad Profiles of Growth

- There are different types of population growth in different areas of New Zealand. Growth in an area can be a result of net migration (people moving into the region) or natural growth from births.
- Characteristics of the area influence the response to growth and, in some cases, there is the ability for expansion and new development. In other areas, increasing capacity may require redevelopment or strategic solutions across a school or groups of schools.
- We have identified 20 growth catchment areas within Auckland. For each catchment we have categorised them into one of three different profiles of growth: Blueprint for Growth, Complex Growth, Steady Growing. These are the three profile definitions:

Blueprint For Growth

This is where local government planning includes intensive housing development and expansion into outer urban areas in response to, or causing, a large influx of people to move into a particular areas. These are opportunities to master plan education infrastructure collaboratively across agencies to integrate in the new communities.

Complex Growth

This is where the area is desirable and there continues to be population growth despite limited room for expansion outwards. Local planning efforts are focused on redevelopment activities, intensification, or urban renewal to increase capacity or in response to other social and economic drivers.

Steady Growing

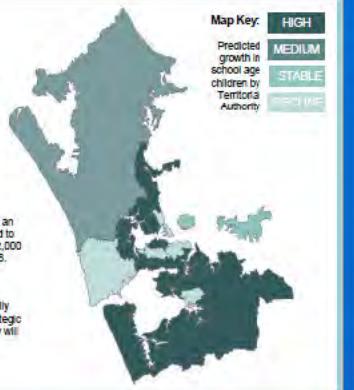
This is where population growth across a region is limited but a response is still required. For example there has been a change in the demographics of the region, with more young families moving into existing suburbs. Local planning efforts are focused on providing services for the demographic change.

A new approach is needed to ensure that the educational needs are met for every child in New Zealand.

We have an opportunity to modernise and expand our network to support education now and for decades to come.

We have forecast that between 2017 and 2030, an additional 60,000 student places will be required to meet growth in the Auckland school network. 12,000 of these have been funded through to Budget 18.

Historically we have funded places through the annual Budget process. Seeking funding annually reduces the ability to plan ahead and make strategic or innovative changes to the network. Flexibility will enable us to be responsive to growth.



Common solution framework across the full network

Different types of growth require different responses in terms of school network solutions. We have identified a set responses and pre-determined triggers for when responses will be implemented.

Enrolment zones
- Redirect students to under-utilised schools through zoning solution, e.g. new zone or shrink zone, managing out-of-zone enrolments.
- Zoning solution always first step considered when school at risk of exceeding student places.

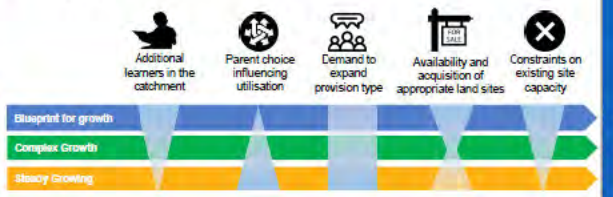
Network restructure
- Merger, relocation, or school type change e.g. primary to composite, from single sex to co-ed, English medium to bilingual.
- Considered if changing the network will redirect students to other schools with student places.

Roll growth funding
- Build new classrooms in existing schools to meet capacity, temporary or permanent.
- Considered after zoning options exhausted and schools still projected to be over-utilised.

Establish new schools
- Acquire land and build new school - from start to finish takes six to ten years.
- Considered if the network is projected to exceed capacity within six years.

Additional factors influencing solution decisions

There are a range of factors influencing the network solution. For example, in some cases additional classrooms can not be added to existing schools because there is no physical space available. The likelihood of these factors being present vary across the different growth profiles. We have illustrated the prevalence of some common factors.



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Why the Auckland FDS is important to MOE

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INFO SHEET

National Education Growth Plan (NEGP)

The NEGP is a new way of thinking about and co-ordinating the Ministry of Education's response to population growth across New Zealand.

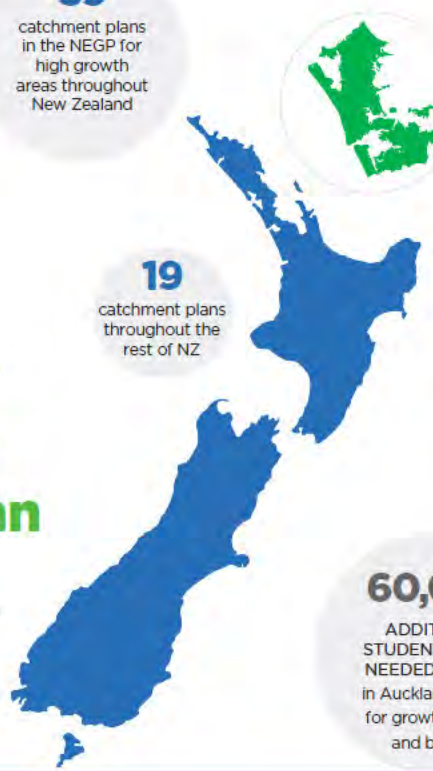
The NEGP Incorporates the...

Auckland Education Growth Plan (AEGP)

39 catchment plans in the NEGP for high growth areas throughout New Zealand

20 catchment plans in Auckland

19 catchment plans throughout the rest of NZ



▸▸ Population growth is placing pressure on our school network in specific areas of the country. These high growth areas are all unique and are experiencing growth in different ways.

▸▸ A new approach is needed to ensure that the educational needs are met for every child in New Zealand.

60,000 ADDITIONAL STUDENT PLACES NEEDED BY 2030 in Auckland to cater for growth to 2030 and beyond.

Key facts

The current population of Auckland is 1.65 million. Over the next decade, Auckland is projected to receive at least 55% of New Zealand's total growth and will reach two million people by 2028, adding another 45,000 people to the city each year.

By 2028, 18% of Auckland's population will be aged between 0-14 years old, with a further 6% aged between 15-19 years old. Of the Māori population in Auckland, one-third are aged between 0-14 years.

Auckland's education region has the largest student population, with over 275,000 students. In the 12 months to July 2018, the addition of 3,500 students continued to put pressure on Auckland's school network.

Of the 100,000 new student places forecast in the NEGP as being needed in high growth areas nationally by 2030, 60,000 of these are forecast as being needed in Auckland.

Investment

Auckland is our largest area of growth with its own Growth Plan.

Long term investment is required to deliver the AEGP.

Planning

The Ministry has undertaken engagement with the Auckland Education Sector, to understand their ideas for managing the growth in their local schooling networks in the next decade.

Our Growth Plan is aligned with and enhanced through partnering with Auckland Council and other government agencies.

Solutions

Catchment plans present strategic solutions for managing education demand across Auckland. Detailed response planning for each catchment will follow.

We will work with schools to implement enrolment schemes, apply schooling level changes, add in additional capacity and consider network structure as required across the Auckland region.

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Key Submission Points

Ministry generally supports the Council's compact centres-based approach

BUT the detail is critical

- How this is achieved and delivered is important
- Significant questions about how the aims of the FDS will be achieved and implications for managing growth
- This relates to both the FDS and the supporting Implementation Plan that enables delivering the growth outcomes it seeks

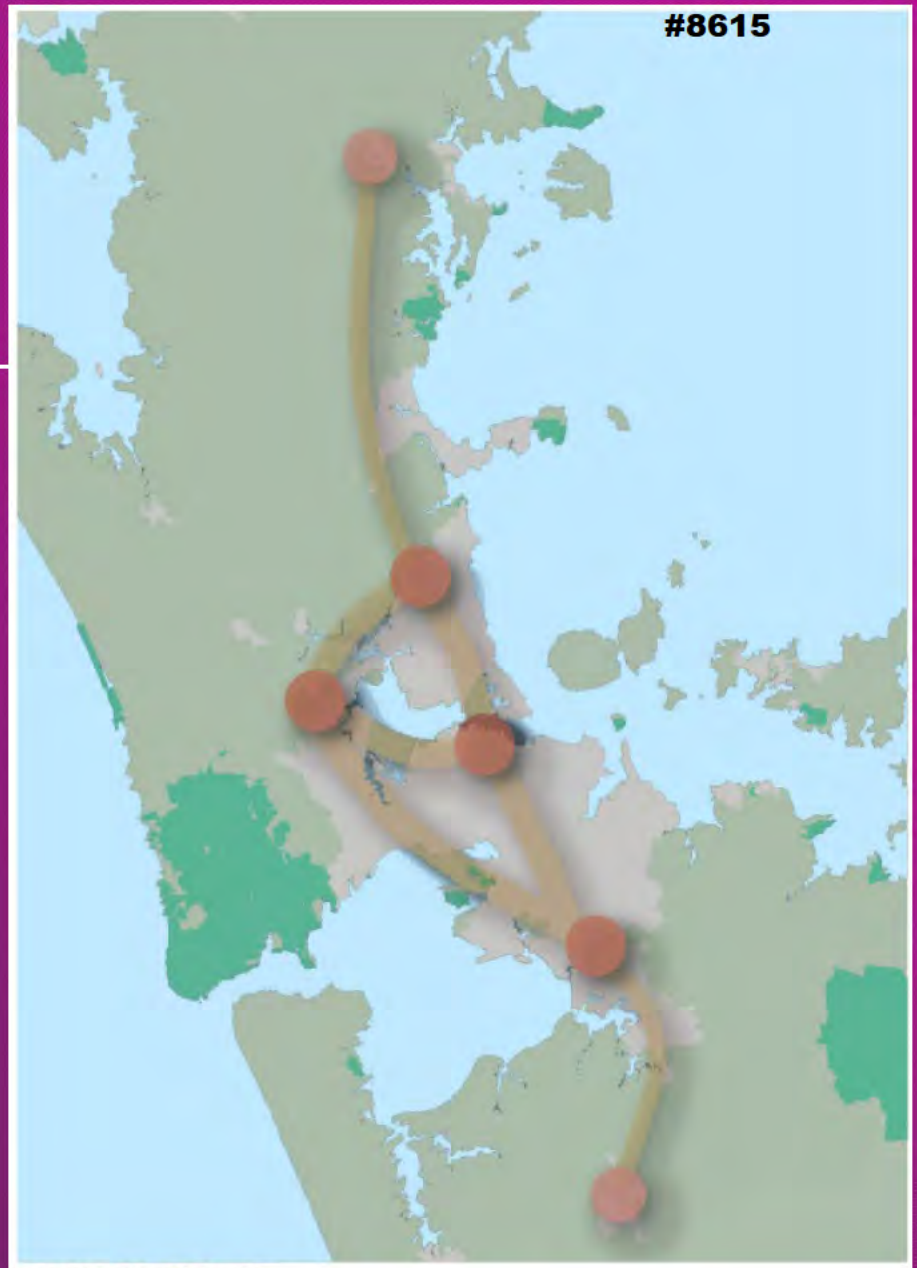


Figure 10 - Multi-nodal model

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Key Submission Points

Ministry holds a number of key roles:

- Crown Agency
- Provider/ Developer of Additional Infrastructure
- Landowner

FDS is missing a critical component – "additional infrastructure" to support growth

Necessary to provide for ***"well functioning urban environments"*** under the National Policy Statement on Urban Development 2020



Ngākoroa Primary School, Auranga Drury



Ormiston Senior College

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Ministry of Education

Key Submission Points

Brownfield/ Existing Urban intensification priority – implications for education infrastructure network

Understanding quantum, timing, nature and/or type of development is critical for the Ministry – the FDS is very light on the detail for the existing urban areas

The updated HBA information is critical – expected to provide detail on housing demand, capacity and estimations on what development is feasible & reasonably expected to be realised

Without the accompanying HBA the Ministry is unable to update our forecasting and planning for the schooling network

The HBA is supporting information expected to be provided with the FDS



Key Submission Points

- Greenfield/ Future Urban Land Sequencing Changes – implications for education infrastructure network

- Involvement in Implementation Planning & Delivery to support the FDS

- Involvement in SPAs / growth priority areas now and going forward

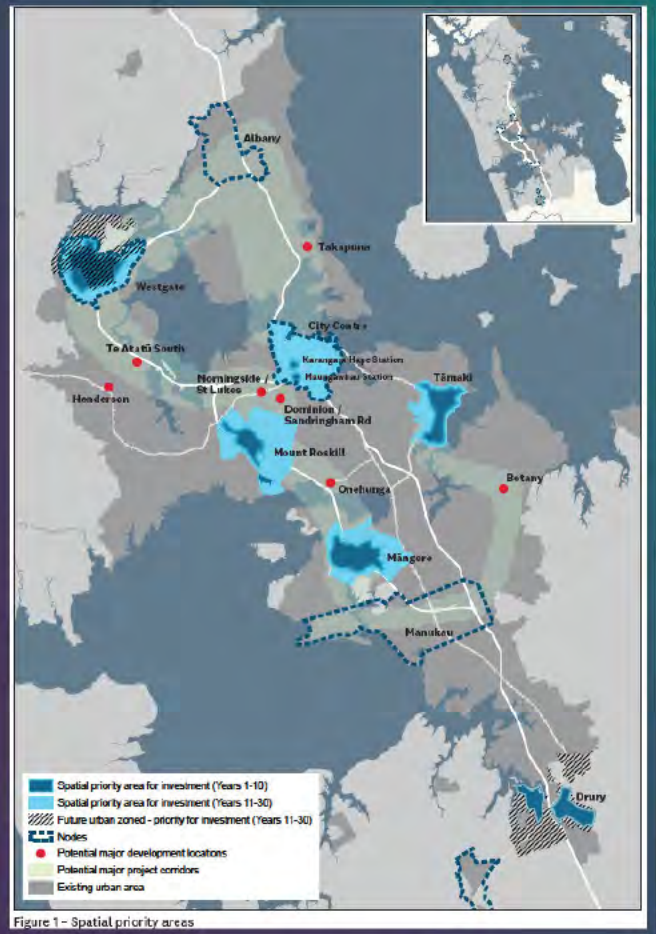
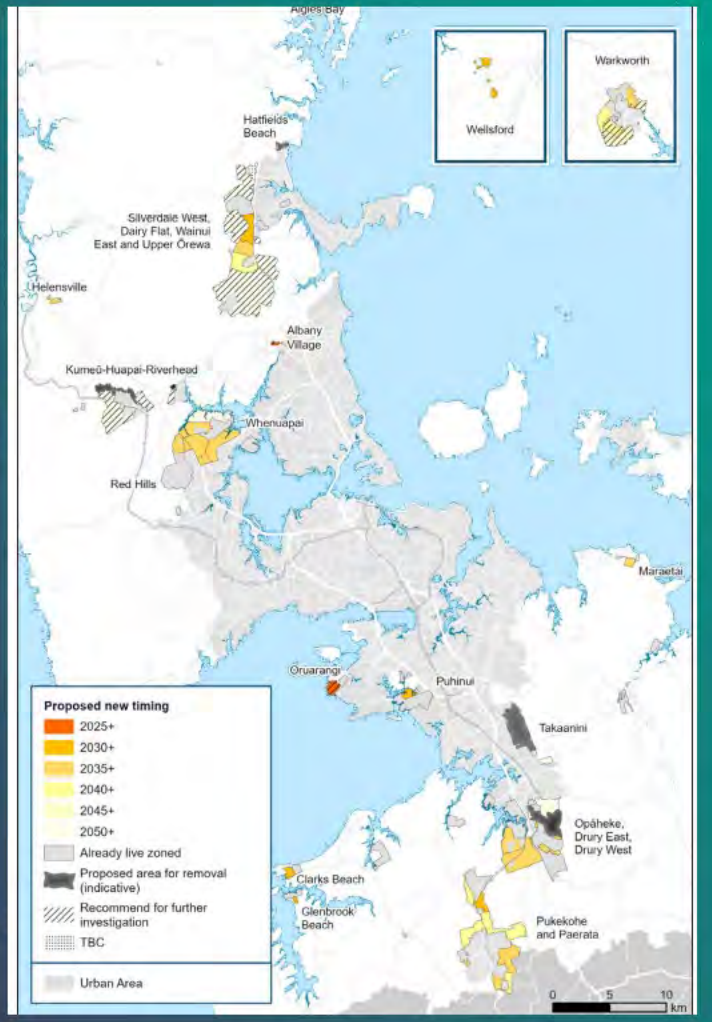


Figure 1 – Spatial priority areas



FDS maps: Spatial Priority Areas and Future Urban Areas

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What is the Ministry seeking?

- To work collaboratively with Auckland Council, central government agencies, key stakeholders and partners in developing and implementing the FDS
- To better understand the location, quantum, sequencing and timing of growth
- Ensure collectively we are meeting the government policy directive of achieving **"well-functioning urban environments"**
- Whilst Council has sought to keep the Ministry informed – **we seek to work in a greater spirit of partnership and collaboration moving forward**

[redacted]

- This is critical for our role and responsibility as a provider of social infrastructure across the education system

#8615

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education.govt.nz

We **shape** an **education** system that delivers **equitable** and **excellent outcomes**

He mea **tārai** e mātou te **mātauranga** kia **rangatira** ai, kia **mana taurite** ai ōna **huanga**

Te Kāwanatanga o Aotearoa
New Zealand Government

Te Tāhuhu o te Mātauranga
Ministry of Education

Submission on Auckland Council's Consultation Draft Auckland Future Development Strategy 2023-2053

To: Auckland Council

From: Clive Huggins (Director Land Investment and Planning, Ministry of Education)

Date: 31 July 2023

Subject: Submission on Auckland Council's Consultation Draft Auckland Future Development Strategy 2023-2053

1. Background

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

The Ministry of Education (the Ministry) is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Auckland region.

2. Overarching Comments - Draft Auckland Future Development Strategy

The Ministry thanks the Council for the opportunity to make a submission on the FDS.

The Ministry generally supports Auckland Council's compact centres-based approach, which focuses growth in existing urban areas that can be serviced by infrastructure (Section 1.2.4). This includes limiting growth in rural areas, with the growth of satellite nodes favoured (Section 4.2.3).

The Ministry, whilst supportive of the intent of the FDS, has concerns about how the aims of the FDS will be achieved and the implications for managing growth in the medium and long term. The intention of an FDS is to promote integrated land use and infrastructure planning across a 30-year period in accordance with the National Policy Statement on Urban Development 2020 (NPS UD). This FDS does not identify the additional infrastructure supplied by providers (other than the Council) that will be necessary to support the 30-year development capacity identified by the FDS and does not provide sufficient detail as to the location, quantum, timing and type of growth enabled.

This makes it difficult for the Ministry to understand pressures on the educational network in the short, medium and long term or to proactively plan to ensure educational requirements can be met, contributing to well-functioning urban environments. The ability to align investment of development and additional infrastructure is a critical aim of an FDS under the NPS UD and will require significantly greater work at the Implementation Plan stage if not completed now.

3. Key Matters from the Ministry - Draft Auckland FDS

The Ministry holds several key roles as Crown Agency, provider/developer of additional infrastructure and landowner relating to the provision of social infrastructure across the education system. In order to plan for education requirements to support well-functioning urban environments, the Ministry seeks to understand the likely location, quantum, timing and type of growth in the region. An FDS is a key document to assist the Ministry in our planning, but there are important gaps in the current FDS.

The purpose of our submission is to support elements of the FDS but also to seek changes to the FDS where this would assist the Ministry in our planning for schools to support growth in Auckland.

Our submission covers the following key matters:

- **NPS UD – Additional Infrastructure –** Refer Section 4
- **Improving communication of Auckland's vision for growth –** Refer Section 5
- **Greenfield/ Future Urban Land Sequencing Changes – implications for educational network infrastructure planning & delivery** – Refer Section 6
- **Infrastructure Triggers** – Refer Section 6.1
- **Brownfield/ Existing Urban intensification – implications for educational network infrastructure planning & delivery** – Refer Section 7
- **Spatial Priority Areas and Priority Development Priority Areas** – Refer Section 8
- **Implementation planning and delivery to support the Auckland FDS** – Refer Section 9
- **Clarity on how Auckland Plan 2050 and Auckland FDS work together** – Refer Section 10

The Ministry also supports the Ministry of Housing and Urban Development (HUD) overarching comments on Auckland Council's Future Development Strategy, outlined in section A of their submission. These overarching themes were developed as part of the central government cross-agency discussion and review of the Draft Auckland FDS.

4. NPS UD - Additional infrastructure

Policy 10 of the NPS UD states that local authorities should engage with providers of development infrastructure and additional infrastructure (schools are considered additional infrastructure), to achieve integrated land use and infrastructure planning. In addition to this, subpart 3.5 of the NPS UD states that local authorities must be satisfied that the additional infrastructure required to service the development capacity is likely to be available.

With specific reference to the requirements of preparing and updating an FDS, Section 3.15 (2) of the NPS UD states that (2) In order to prepare the draft required by that procedure, local authorities must engage with the following: … (d) providers of additional infrastructure.

Whilst the Council has consulted with the Ministry during later stages of the FDS, as a Crown agency as per some of the requirements of the NPS UD (3.15.2b), this has been at a very high level and could be significantly improved. Whilst the challenges of developing an FDS of this size are appreciated, greater engagement earlier with the Ministry and other Crown agencies, with sufficient time for this to have a meaningful impact on the final FDS would have been beneficial.

The need for the FDS to address additional infrastructure requirements under the NPS UD is essential to achieve well-functioning, sustainable and thriving urban areas and communities. This will ensure that urban development is integrated with infrastructure planning and funding (NPS UD – Objective 6), achieve integrated land use and infrastructure planning (NPS UD Policy 10 b) and additional infrastructure is available to service development capacity (NPS UD Sections 3.5.1 and 3.15.2d).

Appendix 3 of the FDS sets out infrastructure to support development capacity, including additional infrastructure, but does not include educational infrastructure. There needs to be greater recognition within the FDS of the additional infrastructure that is required to enable well-functioning urban environments.

Relief Sought:

The Ministry considers engagement with additional infrastructure providers to be a fundamental requirement when developing an FDS. The Ministry seeks that Auckland Council engages further with us directly in order to identify the additional infrastructure requirements needed to service the projected residential growth over the 30-year period of the FDS.

The Council may wish to consider amending Appendix 3 of the FDS to include recognition of additional infrastructure beyond that provided by the Council. However, in order to inform the identification of additional infrastructure requirements, the FDS needs to identify the quantum, timing and type of growth anticipated, along with indicative densities, rather than rely on the Implementation Plan stage to provide this level of detail. Without this information even at a high level the Ministry cannot provide useful input on the sufficiency of additional infrastructure.

Prior to the Implementation Plan phase starting, supplying growth model information created to inform the draft FDS, including the Housing and Business Development Capacity Assessment (HBA), would provide an evidential base from which to begin developing robust estimates of development capacity, timing and typology. Similar information has been invaluable in other FDS processes to enable the Ministry to provide useful input as additional infrastructure providers and as a Crown agency.

5. Improving communication of Auckland's vision for growth

The Ministry considers the SPA Map (Figure 18) in its current form does not provide a clear picture/vision of where the Council would like growth and intensification to be directed to, particularly within the existing urban areas. It lacks a legible land use and public transport integration vision, and it doesn't yet communicate a clear strategy around a hierarchy of centres and corridor intensification aligned with public transport investment (existing and proposed).

The previous Auckland Plan Development Strategy provided a clear vision for growth with sequencing over a 30-year period. The SPA map seems to primarily convey where the Council has agreed funding for

infrastructure investment aligned with the Proposed Long-Term Plan (LTP). However, the role of an FDS is to assist the integration of land use and infrastructure planning and funding decisions over a 30-year period.

Planning for new schools can take 7-10+ years and the demand for schools is time-sensitive. Where possible, the Ministry needs to be able to anticipate where demand will be and have schools in place in time to meet the needs of the school-aged population. The FDS does not yet provide the Ministry with the necessary level of detail to enable proactive planning for new schools and could lead to reactive or poorly planned investments.

Relief Sought:

The Ministry recommends the Council amend the FDS SPA Map (Figure 18). The revised map should seek to provide a clear vision of where both urban intensification and greenfield growth and development will be focussed. Other Urban Growth Partnerships (UGPs) such as the Greater Christchurch Partnership, Future Proof, and Smart Growth have developed clear and concise graphical outputs to illustrate the growth vision well beyond a focus on 1-10 year infrastructure investment.

It is recommended to consider visually communicating the following content as a minimum:

- Integration of land use density and intensification with public transport investments particularly regarding Rapid Transit Networks (existing and proposed networks).

- A clear hierarchy and network of centres and locations of significant employment areas. Consider incorporating this with the 'local areas / locations' that are also intended to take growth but have not been identified spatially on the SPA Map.

- Clear timing aligned with the NPS UD definitions of short (0-3 years), medium (3-10 years) and long-term growth (11-30 years).

6. Greenfield/ Future Urban Land Sequencing Changes – implications for educational network infrastructure planning & delivery

The Ministry acknowledges the Council has reviewed the extent and timing for Auckland's Future Urban Areas (FUA). Factors that have influenced the review include:

- Urban areas capacity increase / up-zoning resulting from the NPS UD including Medium Density Residential Standards (MDRS)
- Climate change policy direction considering matters such as natural hazards.
- Reducing vehicle emissions through VKT reduction requirements.

It is also acknowledged that Private Plan Changes (PPCs) are a key consideration that has undermined the Council's existing strategy to manage greenfield growth through the current Future Urban Land Supply Strategy (FULSS 2017). The proliferation of PPCs that have live-zoned Future Urban Zone (FUZ) areas ahead of intended sequencing timeframes provides significant challenge to infrastructure provision and delivery.

The Ministry as an infrastructure provider across the education system, is significantly impacted by the proposed changes to land sequencing and staging as currently signalled in the FDS. Our school network planning, infrastructure planning and delivery is currently timed to align with the urbanisation of greenfield areas as per the FULSS. There is considerable complexity in planning for schools in growth areas, including

a consideration of the capacity of the existing school network in an area, alongside considering the need for new schools.

It is important to note that due to the time required to deliver infrastructure (7-10+ years) the Ministry is actively engaged in investigations for investment in school sites to meet the demand signalled through the current FULSS. The significant changes signalled for Future Urban Areas (FUA) in the FDS could therefore have substantial implications for the Ministry if this investment is no longer required or will be delayed in its need. There are complex implications of how new schools are staged in their development combined with managing and increasing the provision of existing school capacity in school catchment areas.

For most of the greenfield growth areas across the Auckland region, there are communities already established in these locations with live zoning through a combination of Special Housing Areas (SHA's), PPCs and the Council-initiated structure planning and rezoning. The Ministry needs more certainty in relation to the location and timing of FUA, embedded in a defensible policy framework through the FDS and Auckland Unitary Plan (RPS section), so that we can confidently invest in the necessary additional infrastructure required to support well-functioning urban environments.

Relief Sought

The Ministry seeks to work collaboratively with the Council on what has been identified as the Way Forward for Future Urban Areas (Section 4.2.2). We request greater involvement in the analysis and prioritisation of FUA so this can inform our investment timeframes over the short, medium and long term. The Ministry would like to understand timeframes from the Council for undertaking this work programme, and how the Ministry can be involved in this work going forward.

Further work the Ministry seeks to be involved with includes:

- **Areas identified for further investigation** in relation to the identified FUA shown on Figure 13. This work needs to be prioritised to ensure clarity is provided for the development and infrastructure sectors. The Ministry would like to understand the timing of when this work will be undertaken and to be involved early in this process.

- **Areas of deferred timing for development readiness** – where new timing / staging has been proposed for FUA. There is a need to better understand the transition of places where communities exist, new growth has commenced and the provision of additional infrastructure such as schooling still needs to be planned and delivered. Changes proposed for land sequencing/staging have significant implications in these areas for additional infrastructure provider investment. This work needs to be tied strongly to issues of responsiveness and enforcement of timing to provide an understanding of the trade-offs and risks involved.

- **Areas where land has been removed from development –** where areas are planned for removal the Ministry would like to be part of the evaluation and process to do this to understand the impact on our infrastructure and networks.

- **Development timing based on infrastructure triggers –** please refer the Ministry's comments and relief sought under submission point 6.1 below.

Additionally, the Ministry recommends that the Council clearly state in the FDS the intention to embed the approach to FUA into the statutory policy framework through the Auckland Unitary Plan (eg. RPS section) and begin to scope the process of what this would look like with key stakeholders.

6.1 Infrastructure Triggers

The Ministry acknowledges the Council proposes to introduce 'infrastructure triggers' as a mechanism to control development in the FUZ and/or greenfield rezoning out-of-sequence, or ahead of the necessary infrastructure required to support live zoning land. While the Ministry is supportive of the identification of infrastructure needs and staging across the region, the use of these triggers is not clear in their current form.

There is confusion over the requirement for all infrastructure to be provided and the ability for these to be altered in response to the changing needs of the region. While the Ministry is supportive of measures and tools to strengthen how PPCs are managed there needs to be clarity around what these triggers mean and implications for other statutory processes. Infrastructure triggers are identified specifically to manage Future Urban Areas (Appendix 6) however it is not clear in the FDS how this mechanism will be delivered upon.

The Ministry agrees there does not seem to be a successful policy framework to enforce the existing FULSS 2017 (Section 4.2.2). However, it is unclear what specific consequential policy changes are signalled to improve this in the Regional Policy Statement (RPS) section of the Auckland Unitary Plan, if any. All changes need to ensure the 'responsiveness' requirement of the NPS UD is still achieved but is balanced against the other aims related to integrated planning of land use and infrastructure. Developing a clear and robust policy framework will ensure that infrastructure providers, such as the Ministry, can better manage and plan for the provision of infrastructure to support growth and established communities in and nearby FUA. The Ministry strongly supports integration of schools and other social infrastructure within Structure Plan processes that are resourced and led proactively by the Council, instead of responding to PPCs, to enable synergies for local and central government investment.

Relief Sought

Clarify the role of Infrastructure Triggers and how they will be applied and used in subsequent planning processes. We suggest a greater collaborative approach for further development of this mechanism with regional stakeholders.

Develop a clear policy approach to address of out-of-sequence or unanticipated development and we ask that this includes consideration of the impact on additional infrastructure.

Resource and prioritise Structure Planning (both new and reviews of existing) and other forms of Council-led Area Planning to proactively link infrastructure delivery with land use and staging. This includes both Greenfield and Brownfield areas indicated for growth.

7. Brownfield/ Existing Urban intensification – implications for educational network infrastructure planning & delivery

The Ministry understands the Council requirements under the NPS UD to provide sufficient development capacity to meet demand for housing and business land over the next 30 years. We acknowledge the FDS indicates that over the last five years over 80% of growth has happened within existing urban areas and the Council seeks most future growth to be accommodated within existing urban areas. Ample development capacity is indicated within Appendix 4 of the FDS, but the creation of well-functioning urban environments will require significant proactive spatial and area planning by the Council to ensure that coordination of investment will result in attractive, liveable and high-quality urban environments.

The Ministry's National Education Growth Plan (NEGP) identifies what we know about the anticipated location and patterns of growth in school-aged children to 2030 and where we are responding to development (both brownfield and greenfield). While the NEGP shows how sufficient capacity in the school network can be delivered in the right place at the right time it requires careful and informed forward planning. Significant recent changes such as MDRS make the delivery of infrastructure in Brownfield contexts challenging, but important to ensure well-functioning urban environments.

The demand for Primary and Secondary education is dynamic, with different communities demonstrating significantly different age profiles. This can result in significant changes in local demand for education over time, even in areas of limited change in housing, or can exacerbate surges in demand that result from some changes in housing typology. In response the Ministry has several mechanisms for planning its network to accommodate growth including amending school enrolment zones; funding of roll growth by adding classrooms in existing schools; network restructure such as merger, relocation, or school type change e.g. primary to composite, from single sex to co-ed, English medium to bilingual; and the establishment of new schools.

The implications of servicing more densely developed urban areas will also require the Ministry to explore different ways of planning and providing for new and / or growing existing schools. This will require the exploration of opportunities such as sharing facilities, more intensively developed school layouts and the potential of sharing land with other public sector organisations given the scarcity of land and its increasing value.

The FDS is a key document to help inform this network planning. Understanding the quantum, timing and type of development and investment that is signalled through a FDS is critical to ensure we can plan for sufficient capacity in the school network. Outside of the high-level numbers provided in Appendix 4 there is little information on this and the updated Housing and Business Development Capacity Assessment (HBA) that has informed the FDS has not yet been published by the Council.

The HBA is critical for the Ministry to understand as it provides key detail on housing demand, capacity and estimations on what development is feasible and reasonably expected to be realised. This level of detail is necessary to assist with forecasting and planning for the school network and without this it is not possible to provide comments to the FDS on the sufficiency for additional infrastructure as required by the NPS UD.

The current draft FDS and supporting evidence report's lack the detailed development and feasible development capacity information relating to the existing urban area. Without this information it is difficult to understand network pressures in the short, medium, and longer-term or to proactively align investment decisions between central and local government infrastructure providers to where growth is being directed to and when. This aligned investment is a critical aim of an FDS under the NPS UD and will require significantly greater work at the Implementation Plan stage if not completed now.

Relief sought:

The Ministry seeks greater data exchange and in-depth discussions with the Council to assess the implications of the FDS on its school network. The Ministry also wishes to be involved in proactive structure/spatial/area planning undertaken by the Council within Brownfield areas.

The Ministry requests that the latest HBA be made available as soon as possible to interested stakeholders to ensure the evidential base for decisions is understood and to understand implications for our planning.

The Ministry welcomes new ways of working across the Crown agencies and with the Council to provide for education needs in innovative ways, such as with land swaps, co-ordinated planning, shared facilities and investment.

8. Spatial Priority Areas / Priority Development Areas

Under the Auckland Housing and Urban Growth Partnership (AHUGP) a joint work programme of projects has been agreed. However, these AHUGP priority areas have not all been clearly identified within the FDS (Figure 18 – Spatial Priority Areas). Ensuring consistency with the currently agreed priorities is essential to align previous and future investment across the public and private sector.

The Ministry has not been involved in the selection of the SPAs nor the development of the criteria used in their selection. The process to date has involved the Ministry commenting on the SPAs at a very high level, with little information or detail on selection provided prior to the publication of the FDS. There is an opportunity here to improve the collaborative approach to the selection and prioritisation of the SPAs.

Greater involvement here of regional stakeholders would allow for a more detailed understanding of growth and the opportunity to input proactively in growth planning rather than responding to already decided priorities.

There is also terminology used in the Draft Auckland FDS that is confusing to understand. For example:

- Is an SPA equivalent to the currently identified AHUGP Priority Development Areas (PDA)? (eg. Northwest and Drury).
- Inconsistency between the AHUGP Northwest PDA, and the FDS Westgate Node and Westgate SPA.
- 'Nodes' are not a term used in other UGPs or FDS processes and there is a lack of clarity over how this relates to other strategies. These are also depicted in Figure 18 and are lacking sufficient supporting information (Appendix 5) to understand their role in accommodating growth. Only some Nodes are prioritised/identified for investment over the 30-year period.
- Major development locations and corridors are also identified but there is insufficient detail in the FDS to understand what their role is in accommodating growth and their relative priority in relation to SPAs and Nodes.

The level of detail relating to the SPAs and the Nodes is much less than provided in both the existing AHUGP PDAs, and the Auckland Plan Development Strategy. Appendices 5 and 10 to the FDS do not provide information sufficient to inform our network planning nor do they clarify the relative significance of these areas. Additionally, the FDS does not answer questions related to areas outside the SPAs and Nodes, some of which are experiencing significant growth and will continue to do so as capacity is taken up. The Ministry needs greater detail on SPAs and Nodes to understand the quantum, timing and type of growth proposed, along with infrastructure requirements.

Relief sought:

The Ministry welcomes working collaboratively with the Council across all the FDS SPAs and Nodes in the future. A significant step towards this would be to provide the opportunity for the Ministry and other Crown agencies to input into the development and application of criteria as well as prioritisation of the SPAs as per other UGPs.

Clarify consistency with current agreed regional priorities and clarify the relative priorities of the SPAs, Nodes, and major development locations and corridors. This includes clarifying the terminology used and what this means for implementation planning.

Consider amending the FDS to provide additional detail regarding the SPAs, Nodes, and major development locations and corridors. This would include the potential quantum, timing and type of growth proposed, along with infrastructure requirements as per the NPS UD.

9. Implementation planning and delivery to support the Auckland FDS

It is understood from discussions with Council staff that there is high reliance being placed on the Implementation phase of the FDS to resolve many of the outstanding issues identified in the draft FDS and provide the detail of how growth will be managed. Subsequently, Council staff have explained the FDS has been purposely kept at relatively high level. At present the current implementation section outlined in Part 5 is very brief, with Appendix 12 listing several high-level Implementation Actions and there is a lack of clarity over how this will be enacted.

It is appreciated the size and scale of the Auckland region has made it a difficult and complex exercise to develop the FDS. This scale is also important to consider when developing the Implementation Plan, which may be a series of Plans of considerable scope and detail. Collaborative involvement of regional stakeholders in all stages of this process will be essential.

Relief sought:
Given the role the Ministry plays in providing infrastructure to support growth, to enable well-functioning urban environments, the Ministry seeks to be engaged with and work in close collaboration with the Council in the development of the Implementation Plan and delivery associated with the FDS.

The Ministry suggests the following approach to Implementation Planning to support the Auckland FDS:

- To assist developing an implementation approach, the FDS could be restructured into sub-regional sectors. This would provide a more manageable scale within which to develop Implementation Plans.

- Ensure collation and analysis of monitoring data to inform decisions of infrastructure providers. Ideally this should be undertaken in a collaborative way with all infrastructure providers.

10. Clarity on how Auckland Plan 2050 and Auckland FDS work together

It is unclear how the Auckland Plan 2050 and the FDS are intended to work together. We understand the FDS is intended to replace the land sequencing and staging from the FULSS 2017, and that the Auckland Plan Development Strategy Map (Sequencing Years 1-30) indicating greenfield and brownfield growth will also be replaced. Given the much broader scope of the Auckland Plan it is important to understand the role of each document and the integration across certain chapters.

Relief sought
The Ministry seeks clarity from the Council on how the FDS and the Auckland Plan 2050 will work together. We welcome working collaboratively with the Council and Crown agencies on this matter and seek to improve this as part of the Implementation Plan to support the FDS.

The Ministry does wish to be heard in support of its submission.

Nāku noa, nā

[redacted]

[redacted]
Manager – Spatial Planning
Land Investment and Planning - Te Pou Hanganga, Matihiko | Infrastructure & Digital

[redacted]

[redacted]
Director Land Investment and Planning - Te Pou Hanganga, Matihiko | Infrastructure & Digital

Future Development Plan 2023 #8616

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Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

Healthy Waters agrees with the approach to focus most of Auckland's growth in existing urban areas and to focus development near local centres.

Done well, redevelopment of existing areas will provide an opportunity to apply innovative water sensitive design and optimise the existing stormwater infrastructure, also identify opportunities to day-light urban waterways.

Additionally, infrastructure cost in existing urban areas typically cost less than in future urban areas. Focusing growth in existing urban areas ensure there is sufficient funding to renew poor condition stormwater infrastructure. The operation and maintenance costs are also likely to be less. This will ensure the limited funding is spent in a way that produces the most value, as the stormwater network cost will be spent in an effective manner to support growth.

Done poorly, urban intensification will worsen flood risk and environmental and water quality outcomes. Intensification alone therefore cannot be the sole aim of urban growth; future growth must also ensure other matters, such as those discussed below, are recognised.
Limiting growth in rural areas away from sensitive environmental and economically productive areas will protect the natural environment including the waterways. There should be slower growth in future urban areas, as this will allow alignment of growth with infrastructure provision.

Accessible local centres

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

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

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

Agree

Tell us why

Avoiding hazards

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

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

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

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

Agree

Tell us why

Healthy Waters agrees with the approach to avoid further growth in areas which are exposed to significant risk of environmental hazards.

Healthy Waters is upgrading and extending infrastructure to provide adequate flood protection or buying properties where flooding risk is excessive, this is also part of the "Making Space for Water" programme. It is important to protect the function of flood plains, overland flow paths and natural waterways.

Some hazards can be avoided through engineering solutions, however, this still comes with risk, especially in extreme events and can be costly to build and maintain. Additionally, those communities already struggling are more vulnerable to the impacts of flood hazards.

Healthy Waters supports the removal or removal in parts areas that have been identified as the most constrained by hazards from plans for future development, which includes Hatfields Beach stage 2, parts of Kumeu-Huapai-Riverhead, Takanini, parts of Drury-Opaheke (Slippery Creek).

Areas with moderate exposure to hazards will be further investigated for suitability of future growth, this is an appropriate approach.
Growth should not be enabled in flood hazard areas where people, property, infrastructure and the environment would be exposed to significant risk. Improving flood resilience by enforcing land use and regulatory controls and improving public awareness will ensure that people, property, infrastructure and the environment are protected.

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

A move to stormwater water management and flood hazard management that is more reliant on water sensitive design and less on hard infrastructure will result in a more resilient system. A degraded environment is less resilient and less able to cope with the impacts of climate change.

Working with the natural environment and identifying its unique catchment characteristics and receiving environment will ensure stormwater management and flood hazard management are appropriately integrated into the natural environment.
Additionally, green infrastructure can serve multiple functions: stormwater management, reduction of heat effects, greenhouse gas mitigation, provide ecological benefits such as habitat as well as amenities for the community.

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

#8616

To: Auckland Council, Future Development Strategy

futuredevelopmentstrategy@aucklandcouncil.govt.nz

Feedback on: Auckland Future Development Strategy Consultation Draft 2023-2053

From: Healthy Waters, Auckland Council

Date: 31 July 2023

1. Background

1.1 Auckland Council's Healthy Waters department is responsible for the management, planning and development of stormwater systems and their effects on the environment.

1.2 Healthy Waters works with iwi and prioritises te mauri o te wai, the life-sustaining capacity of water, in our decision-making to ensure water is protected and enhanced. We deliver our objectives in an innovative, sustainable, and collaborative way.

1.3 Healthy Waters aims to future-proof Auckland's water by creating healthy environments, empowering our communities, and building resilient stormwater systems, which fulfil Auckland Council's Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan.

1.4 A key focus of Healthy Waters is supporting growth in Auckland while ensuring stormwater management is accounted for in urban design. This includes that flood plains and overland flow hazards are avoided or appropriately managed, and that water quality and ecological outcomes are maintained and enhanced.

1.5 Healthy Waters is developing a better understanding of the scale and significance of the future impacts of climate change and sea level rise and how these will exacerbate flooding and inundation, infrastructure, erosion hazards as well as impacts to water quality and ecological outcomes.

1.6 The Future Development Strategy will be a key document for Healthy Waters to achieve these outcomes.

2. Healthy Waters feedback includes the following:

2.1 Healthy Waters **agrees** with the approach to focus most of Auckland's growth in existing urban areas and to focus development near local centres.

Done well, redevelopment of existing areas will provide an opportunity to apply innovative water sensitive design and optimise the existing stormwater infrastructure, also identify opportunities to day-light urban waterways.

Additionally, infrastructure cost in existing urban areas typically cost less than in future urban areas. Focusing growth in existing urban areas ensure there is sufficient funding to renew poor condition stormwater infrastructure. The operation and maintenance costs are also likely to be

less. This will ensure the limited funding is spent in a way that produces the most value, as the stormwater network cost will be spent in an effective manner to support growth.

Done poorly, urban intensification will worsen flood risk and environmental and water quality outcomes. Intensification alone therefore cannot be the sole aim of urban growth; future growth must also ensure other matters, such as those discussed below, are recognised.

Limiting growth in rural areas away from sensitive environmental and economically productive areas will protect the natural environment including the waterways. There should be slower growth in future urban areas, as this will allow alignment of growth with infrastructure provision.

2.2 Healthy Waters **agrees** with the approach to avoid further growth in areas which are exposed to significant risk of environmental hazards.

Healthy Waters is upgrading and extending infrastructure to provide adequate flood protection or buying properties where flooding risk is excessive, this is also part of the "Making Space for Water" programme. It is important to protect the function of flood plains, overland flow paths and natural waterways.

Some hazards can be avoided through engineering solutions, however, this still comes with risk, especially in extreme events and can be costly to build and maintain. Additionally, those communities already struggling are more vulnerable to the impacts of flood hazards.

Healthy Waters supports the removal or removal in parts areas that have been identified as the most constrained by hazards from plans for future development, which includes Hatfields Beach stage 2, parts of Kumeu-Huapai-Riverhead, Takanini, parts of Drury-Opaheke (Slippery Creek). Areas with moderate exposure to hazards will be further investigated for suitability of future growth, this is an appropriate approach.

Growth should not be enabled in flood hazard areas where people, property, infrastructure and the environment would be exposed to significant risk. Improving flood resilience by enforcing land use and regulatory controls and improving public awareness will ensure that people, property, infrastructure and the environment are protected.

2.3 Healthy Waters **agrees** with the approach to prioritise nature-based infrastructure.

A move to stormwater water management and flood hazard management that is more reliant on water sensitive design and less on hard infrastructure will result in a more resilient system. A degraded environment is less resilient and less able to cope with the impacts of climate change.

Working with the natural environment and identifying its unique catchment characteristics and receiving environment will ensure stormwater management and flood hazard management are appropriately integrated into the natural environment.

Additionally, green infrastructure can serve multiple functions: stormwater management, reduction of heat effects, greenhouse gas mitigation, provide ecological benefits such as habitat as well as amenities for the community.

2.4 Overall, Healthy Waters agrees with the outcomes sought by the Future Development Strategy, especially to have developments that result in resilient built systems, natural environment and communities, as this will help to establish a truly **resilient water sensitive community.**

2.5 To further achieve this aim, the Future Development Strategy should also recognise the following matters.

2.6 Better recognition on enabling partnership with mana whenua in urban design

Mana whenua's focus on enhancing, protecting and supporting the natural environment, including restoring and enhancing waterways and waterbodies, together with addressing matters associated with equity, aligns with outcomes sought in the strategy.

Mana whenua have knowledge and experience of the natural environment that is unique to them. Partnering with mana whenua will enable greater outcomes for flood hazard management and the protection of the environment, as well as address the enhancing social outcomes.

Better enabling mana whenua in the urban development and design of Tāmaki-Makarau should be better recognised in the principles of set out in the strategy.

2.7 Better recognition of catchment wide planning for stormwater management

Several private changes have occurred that are not in sequence with the Future Urban Land Supply Strategy 2017 which has negatively impacted infrastructure providers ability to deliver large scale planning, which require more planning and lead time, including stormwater infrastructure. "Fast-track" processes have exacerbated this pressure.

Stormwater management is best looked at from a whole-of-catchment perspective. The whole catchment view allows assessment of upstream catchments and identifies any concerns that then can be assessed and addressed, such as stream erosion, this manages and offset any downstream effects or requirements, which will help to reduce cost, mitigate flooding effects, improve environmental outcomes and provide amenities for communities.

A whole-of-catchment stormwater management will identify early on the unique characteristics of the catchment and the receiving environment, and address flood hazard risk to ensure growth is appropriate and any future development would need to comply with the whole-of-catchment stormwater management ensuring an integrated stormwater management and flooding hazard approach, further ensuring the protection of the receiving environment from degradation.

It allows for stormwater management planning to factor in the effects and patterns of growth on the catchment, current infrastructure and receiving environments. A whole-of-catchment planning provides more opportunities to collaborate with the development community and acquire quality assets, and opportunities to share in the funding with developers to provide catchment wide stormwater solutions that provide cost effective flooding hazard protection and

sustainable water quality outcomes. It also allows for a more balanced public and private responsibility for stormwater management at source and water sensitive stormwater solutions.

2.8 Better recognition for the incorporation of up-to-date information

It is important to ensure that up to date information and knowledge about flood hazards are used to inform policy, regulation, development, and asset management decisions at all levels so that Auckland's communities recognise and plan appropriately to adapt and respond to future risks in their catchments and coastal environments.

The Future Development Strategy needs to be able to adapt and make changes as new data comes to light.

2.9 Better recognition of future constraints on growth arising from the National Policy Statement for Freshwater Management

Auckland Council must notify Auckland Unitary Plan changes to implement the National Policy Statement for Freshwater Management by Dec 2024. This includes the setting of bottom lines for water quality and freshwater ecosystems, including within urban areas. The council is also under the obligation to address any degrading areas of water quality and freshwater ecosystems.

These obligations will have implications for urban growth, and must be specifically recognised within the strategy as a future constraint.

2.10 Better recognition of the opportunities of the Affordable Water Reforms

Increased population together climate change, flood resilience, erosion mitigation and the need for improved water quality and ecosystem outcomes all mean the demand for upgraded and new stormwater infrastructure will only increase.

The Future Development Strategy states the Affordable Water Reforms will make this more complicated to manage. However, it must be acknowledged that the aim the Water Reforms is to address all the matters raised in the strategy, and provide an opportunity for addressing these issues in a more economically sustainable approach.

Future Development Plan 2023 #8617

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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

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

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

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

Tell us why

Resilient infrastructure

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

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

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

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

Tell us why

Other feedback

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

Please refer to the attachment

#8617

Barker & Associates
Auckland

PO Box 1986, Shortland Street, Auckland 1140
Level 4, Old South British Building, 3-13 Shortland Street, Auckland

B&A
Urban & Environmental

31 July 2023

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

Submission on the Draft Future Development Strategy

Introduction

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

Background to Wellsford Welding Club

WWC is effectively a joint venture between a group of private investors and Vuksich & Borich limited. This private investment group has carried out or been intimately involved with several residential land development projects including Ockleston Landing in Hobsonville, Catalina Point at Whangaparaoa and Hunua Views in Drury - which in total will provide more than 700 residential lots to the market. In addition the group has been involved in substantial commercial and industrial developments. Vuksich and Borich is a long-established and well-respected civil engineering contractor with decades of experience in delivering residential and commercial land.

Summary of Submission

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

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

The importance of getting it right is brought into sharp focus in Auckland, where the stakes are high. Auckland contributes 40% to the GDP of New Zealand, and ensuring that there is sufficient land supply for business and housing is an important plank in the economic development of the city and the prosperity of its people. Providing enough land supply enables opportunities for high-value businesses to grow and employ more people, and supports the delivery of a greater range of housing choices by the market. If the strategy is not right – this may constrain the economic development of the region with negative consequences for the New Zealand economy as a whole.

Overall, it is apparent that short-term infrastructure constraints are driving the long term strategic plan for Auckland. Whilst we understand and appreciate the immediate issue, we strongly believe the current approach and the lack of meaningful public discussion will not produce a good long term outcome. We encourage the Council to take a long term view (30 year) as required by the NPSUD. WWC accepts that the Council is facing a significant infrastructure deficit and that it needs to look to alternative forms of funding to pay for growth, including higher levels of direct Government investment. If Council and the development sector work proactively together, the draft FDS provides the opportunity to negotiate this outcome with the Government in a comprehensive way. As it stands, the Council's unilateral approach to planning for growth in Auckland may help to suppress increases in general rates, but it fails to realise the longer-term and wider benefits of growth for the community.

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

In particular:

- WWC is concerned that more transparency/rigour is needed around the capacity analysis that underpins the draft FDS to ensure this has been based on feasible and realisable development capacity and not just plan enabled capacity.
- WWC is concerned that there are discrepancies between the number of additional dwellings identified within the FDS and the Housing Business Assessment. Furthermore, the number of dwellings required has been based on a medium growth scenario and further testing is required against a high growth scenario.
- WWC is concerned that the Council has not completed its assessment of business demand and capacity and therefore the evidence base for the FDS is deficient. Further transparency/rigour is needed in relation to the analysis that has informed the location and sufficiency of business land.
- WWC considers that more detailed spatial analysis is required that builds on the work undertaken for the strategic growth scenarios to ensure this is sufficiently robust and meets the requirements of the NPSUD.
- WWC considers that any roll back or change in sequencing of future urban areas needs to be based on robust evidence informed by spatial analysis and not driven by current infrastructure limitations.
- WWC is concerned that more analysis is required on the affordability impacts constraining greenfield growth.
- WWC is concerned that there has been limited engagement with the development sector to develop the FDS. Furthermore, adopting the FDS by September 2023 provides limited ability to make meaningful changes in response to feedback received.
- WWC request that the sequencing for the Wellsford North Future Urban Zone ("FUZ") be brought forward to 2025 to reflect that there is existing and funded infrastructure to service the development.

The submission below elaborates on these matters.

Draft FDS – Evidence Base and Process Issues

Demand and Capacity Analysis

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

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

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

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

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

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

Growth Scenarios for Development

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

- Feasible and reasonably expected residential development capacity on a sub-regional basis particularly to test the capacity assumed to be provided through intensification as opposed to greenfield growth.

- Location and sufficiency of business land especially for land extensive/industrial businesses. This should include an analysis of the locations for potential new industrial areas, which will in turn inform locations for supporting and proximate residential growth.

- Further scenario analysis of intensification options that considers the location and scale of intensification achievable across the urban area, noting that a conservative approach to hazard management needs to be taken in the urban area as more capacity will be required elsewhere to make up for this.

- Further analysis of greenfield areas not included within the current Future Urban zone, noting that there may be new opportunities for development beyond those that were identified over 10 years ago as part of the Auckland Plan and the original Future Urban Land Supply Strategy. Input from the development sector would support this aspect of the scenario development and analysis.

- The impact on housing choice, housing affordability and land prices. The preferred scenario as it stands will not provide choices that meet the varied needs of people and communities for a range of housing types and working environments noting Auckland's diverse and growing population.

- The ability to access employment and labour. The preferred scenario as it stands will result in fewer residents being able to access employment within a 30 minute commute because there will be a limited amount of local employment made available.

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

Greenfield Development

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

- The use of triggers is problematic in that the analysis undertaken to identify the infrastructure upgrades required is likely to have been undertaken at a coarse scale with no further explanation provided as to how the proposed triggers have been identified;

- The actual infrastructure requirements will vary depending on factors including the nature of the development and infrastructure solutions proposed and the status of development on neighbouring sites; and

- Over time, infrastructure requirements and solutions are likely to change.

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

- Identifies enough land for growth in the right locations where it can be delivered efficiently.

- Identifies what infrastructure is needed to support all future development (not just greenfield), and roughly how much will it cost, focusing on the next 10 years.

- If there is a funding gap, think creatively to find solutions, working in partnership with the Government and the private sector.

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

Affordability Impacts of Constraining Greenfield Growth

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

Process Issues

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

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

- The public was asked to complete an online survey on how they thought the Greater Christchurch partnership should tackle important issues such as building greater resilience to a changing environment, meeting our emissions reduction targets, preserving and enhancing our cultural and

natural environments, creating liveable and healthy urban areas, and supporting the delivery of housing to improve affordability. More than 7,000 people responded to the survey and this informed the development of the draft Greater Christchurch Spatial Plan;

- Public submissions on the draft Spatial Plan will be considered by an independent hearings panel to ensure a more open, transparent and fair process; and
- 4-6 months have been set aside from the close of submissions to adoption of a final plan to enable meaningful consideration of public submissions. In Auckland only two months has been set aside.

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

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

Draft FDS – Sequencing of Wellsford

WWC have land interests over 51.2 hectares of land within Wellsford North. WWC have applied for a private plan change to rezone approximately 72.06 hectares of Future Urban, Residential – Single House, Rural – Countryside Living and Rural Production zoned land for urban development, which will comprise:

- 5.87 ha Residential – Mixed Housing Suburban (MHS) zone;
- 39.64 ha Residential – Single House (SH) zone;
- 17.04 ha Residential – Large Lot zone;
- 0.89 ha Business – Neighbourhood Centre (NC) zone; and
- 11.56 ha Rural – Countryside Living (RCL) zone.

The current and proposed zoning pattern is shown in Figure 1 below.

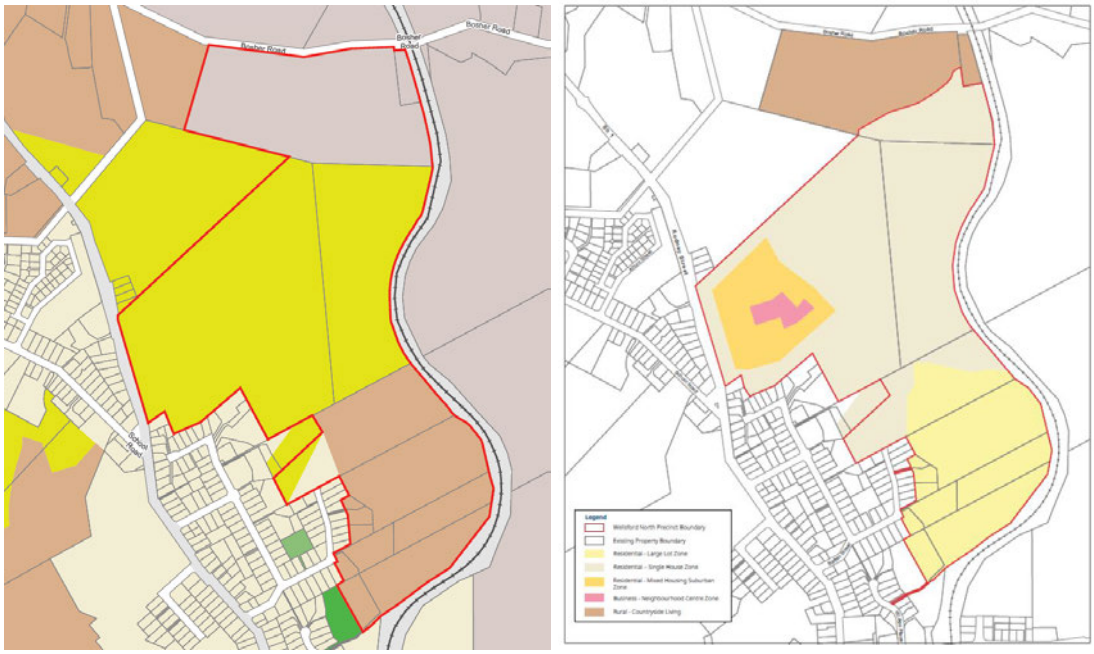


Figure 1: Wellsford North existing zoning and proposed zoning pattern.

The Plan Change request has been informed by the Wellsford North Structure Plan *refer Figure 2* and a suite of supporting technical analysis. The Wellsford North Plan Change was lodged with Council in May 2022 and the further information requests have now been concluded. Council officers are supportive of the plan change and have prepared the Clause 25 report to be reported to the next available committee meeting. The Plan Change documents and response to further information requests have been made available at a link attached to this submission.

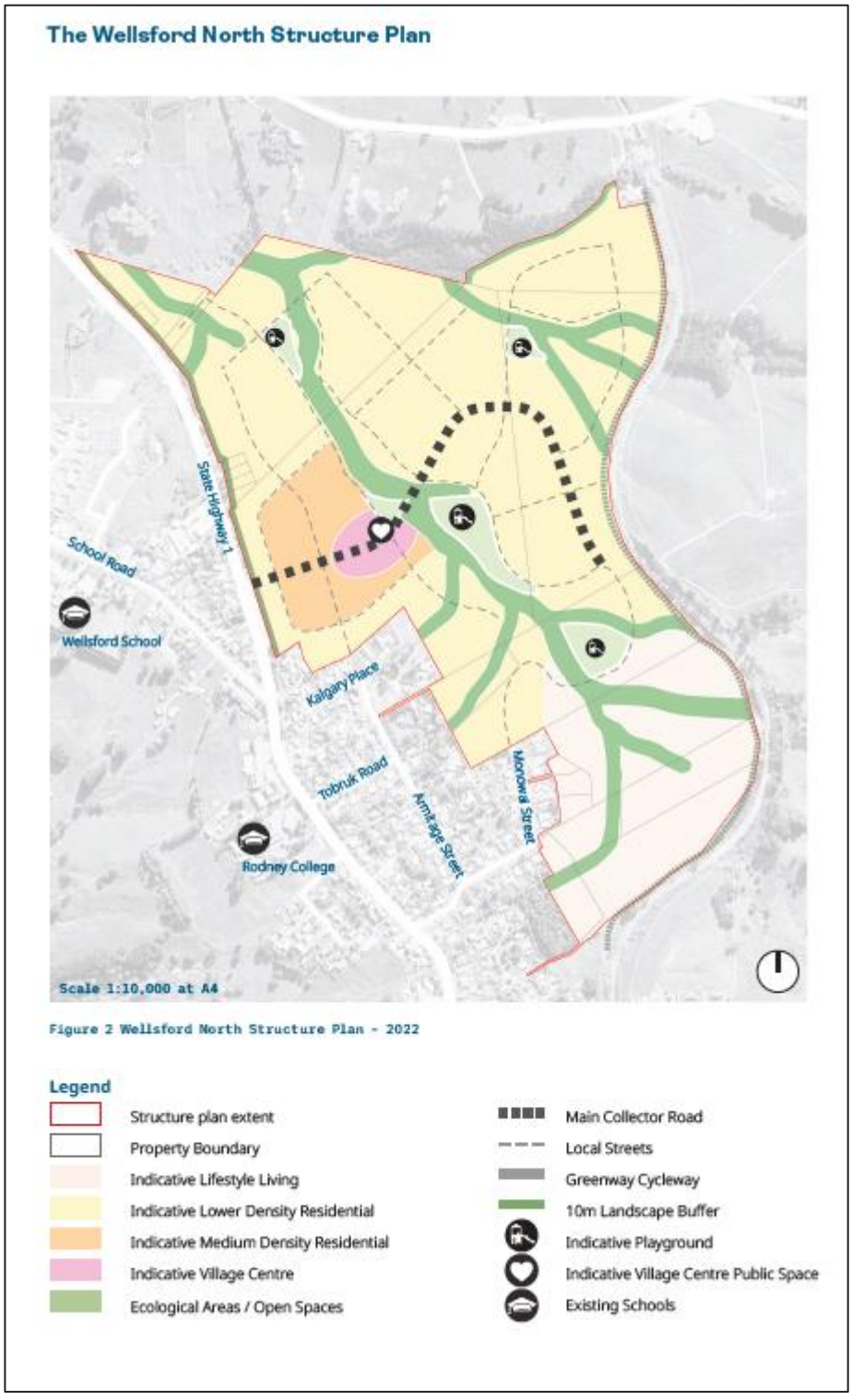


Figure 2: The Wellsford North Structure Plan

The Future Urban Land Supply Strategy (FULSS) identifies Wellsford North as being "development ready", that being live zoned and serviced, in 2023-2027. The FDS now proposes to delay the timing of the release of land at Wellsford North to 2030. The FDS states that the sequencing and timing of live zoning, and

subsequent development, is adjusted to reflect the realities of infrastructure funding and provision[of?] significant capacity in the existing urban area.

WWC do not support this delay in sequencing of Wellsford North as the analysis undertaken in preparation of the Wellsford North Structure Plan and subsequent plan change application demonstrate that there are infrastructure solutions to service development now. In particular all infrastructure required to enable the urbanisation of the live zoned land within the Structure Plan area will be either developer funded, funded through the Watercare Assets Upgrade Plan or through the Infrastructure Funding Agreement between Watercare and the WWC *refer Attachment B*.

Specifically:

• A new intersection will be provided connecting to SH1 (Rodney Street), which will be fully funded by the developer;

• All new internal roads, connections and cycleways will be constructed and funded by the developer;

• Watercare Services Limited have confirmed that the existing water supply network can cater for the proposed plan change area; and

• Infrastructure upgrades to ensure there is wastewater capacity to service development will be delivered through the Infrastructure Funding Agreement between Watercare and WWC.

Given that the Structure Plan and Plan Change application are well progressed, demonstrate that there are no barriers to urbanisation and funding arrangements are in place, WWC propose an alternative staging within Figure 3 that would see the wider Wellsford FUZ sequenced for 2025.

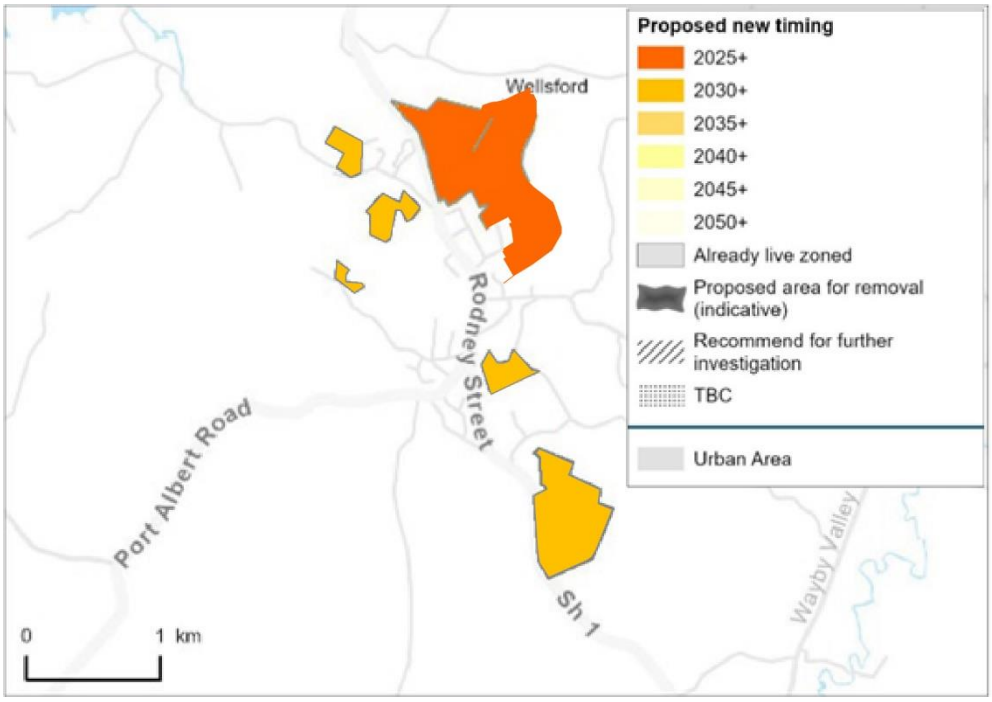


Figure 3: WWC proposed sequencing at Wellsford

Amendments Sought to the Draft FDS

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

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

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

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

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

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

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

g) Provide further analysis to address housing affordability; and

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

i) Bring forward the sequencing of the Wellsford North FUZ to 2025 to reflect that there is existing and funded infrastructure to service the development.

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

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



[redacted] Barker & Associates Ltd Date: 31 July 2023
(Person authorised to sign on behalf of submitter)

Address for Service

Wellsford Welding Club

C/ - Barker and Associates Ltd
PO Box 1986,
Shortland Street, Auckland 1140
[redacted]

[redacted]

Attachments:

Attachment A:	Specific Amendments Sought
Attachment B:	Infrastructure Funding Agreement between Watercare and the WWC

Attachment A – Specific Amendments Sought:

Amendment Sought – Section 2.3.1

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

Amendment Sought – Section 2.3.4

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

Amendment Sought – Section 2.4.2

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

Amendment Sought – Section 2.5

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

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

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

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

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

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

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

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

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

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

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

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

Principle 3

Add a new principle 3(d)

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

Principle 5(a)

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

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

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

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

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

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

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

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

Barker & Associates
Auckland

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Future Development Plan 2023 #8618

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

#8618

FUTURE DEVELOPMENT STRATEGY

SUBMISSION BY THE WILLIAMS GROUP NZ LTD/ARA WEITI DEVELOPMENT LTD - WEITI

28 July 2023

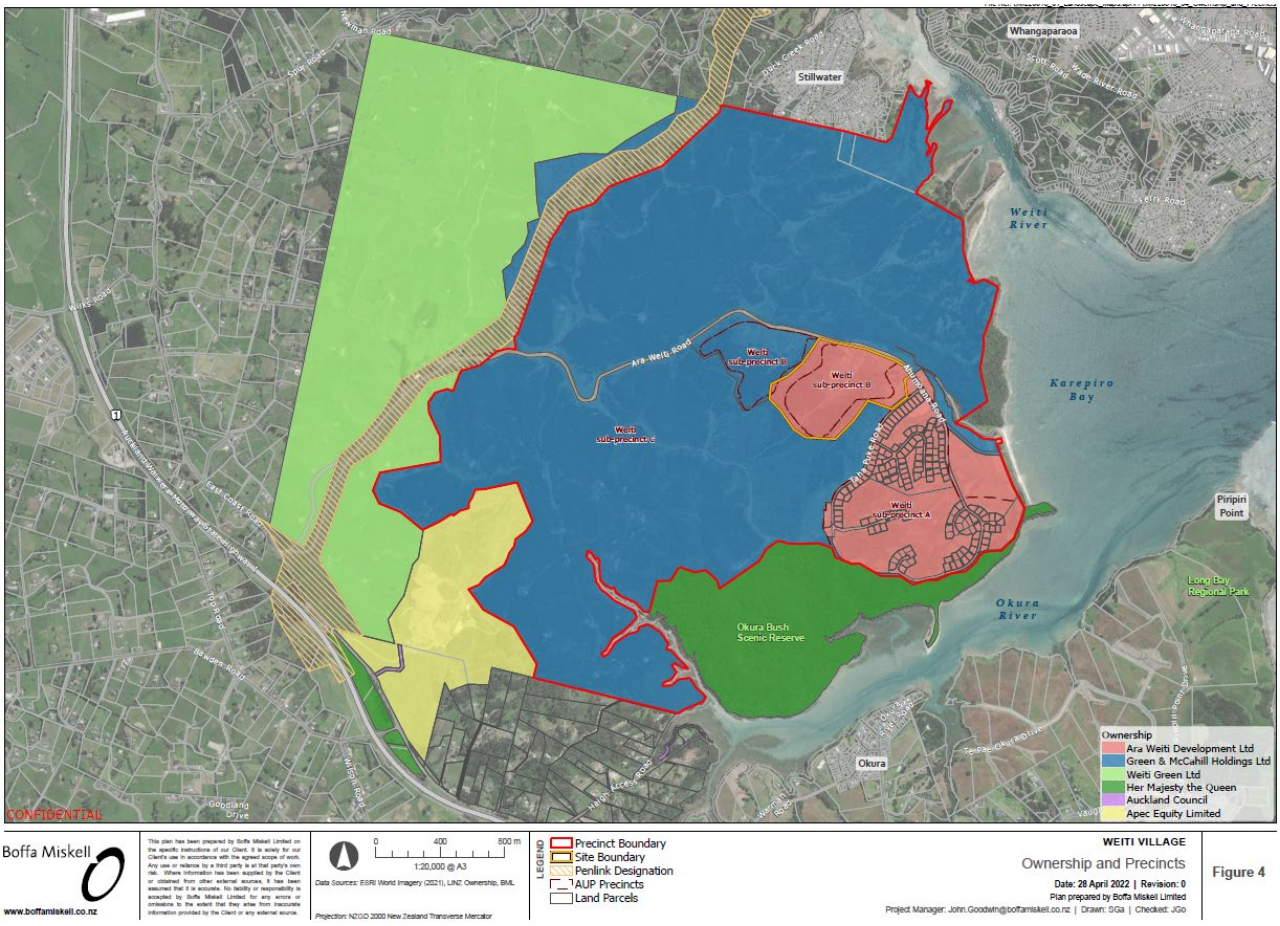
1. Submission

This is a submission by Williams Group NZ Ltd/Ara Weiti Development Ltd ("AWDL") (submitter) to Auckland Council's 'Auckland Future Development Strategy 2023-2053' Consultation Draft (**FDS**). The FDS was released for public consultation on 6 June 2023.

The Williams Group/AWDL is a property development company active in the New Zealand market. The company has property ownership interests within the I547 Weiti Precinct ("Weiti") south of Whangaparaoa Peninsula.

The map below shows the land holdings of these landowners.

Diagram 1: Land Ownership



2. Summary of Submission

The submitters oppose the FDS on the basis it:

a. Will have a significant and detrimental impact on housing affordability and the ability of the development sector to deliver needed housing to manage Auckland's growth.

b. Does not give sufficient weight to opportunities within current zoned land that are vacant but zoned for and able to be developed. Weiti is an example.

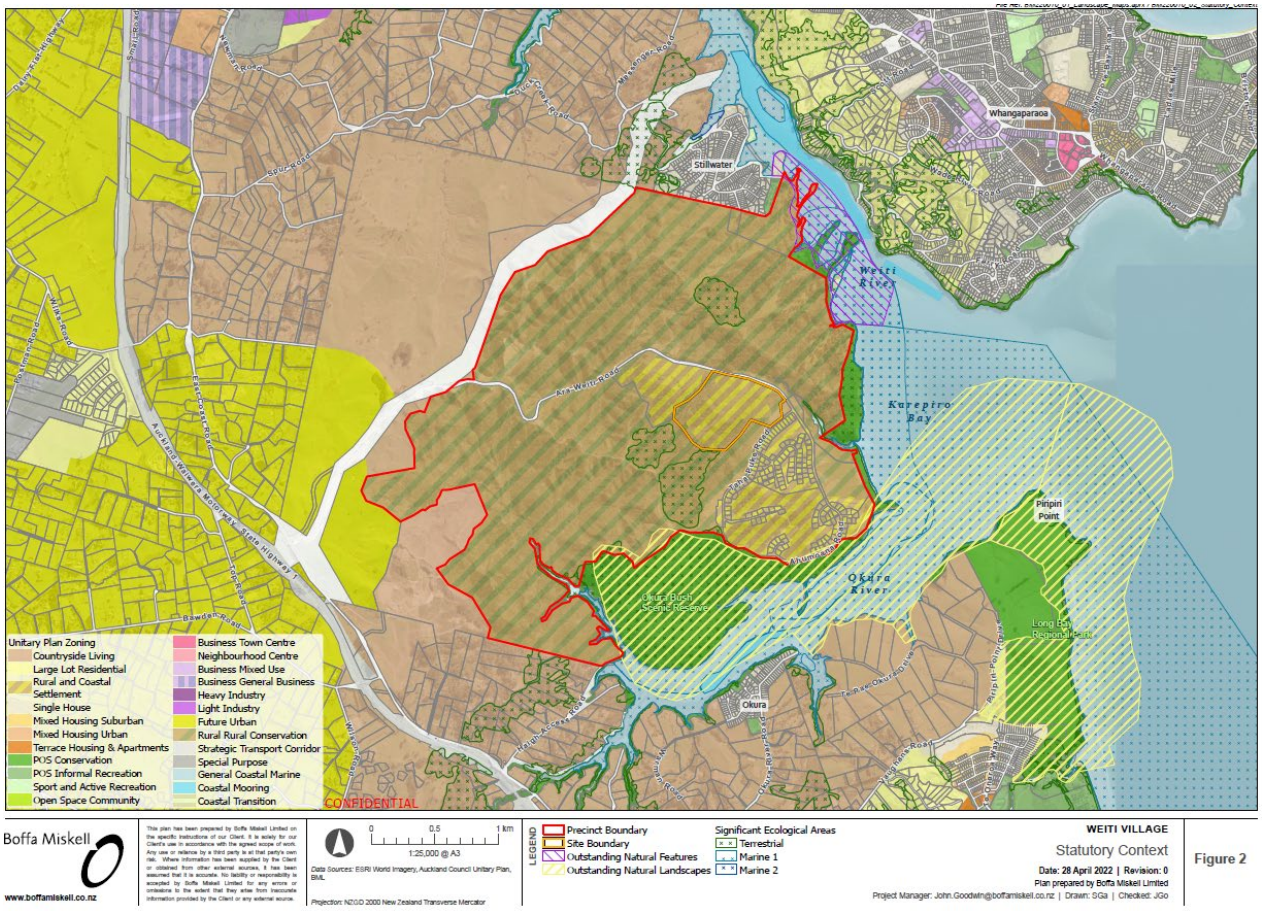
c. Takes an overly cautious approach to potential natural hazards that does not allow for projects to demonstrate they can avoid, remedy or mitigate the risks from natural hazards;

d. Substantially over-estimates the capacity of Auckland's existing urban areas on the basis of an incomplete and inaccurate evidence base, thereby underestimating the need for greenfield development to meet Auckland's projected population over the next 30 years; and

e. Has not been prepared on the basis of an adequate and complete Housing and Business Development Capacity Assessment (HBA) as required by the National Policy Statement for Urban Development 2020 (NPSUD).

The Weiti area is zoned Rural and Coastal Settlement and Rural Conservation in the Auckland Unitary Plan (AUP). It is subject to a Precinct Plan which seeks to create two additional residential villages within the Precinct. The submitter has significantly invested in the future development of this land on the basis of Council's planning documents including the Auckland Plan, the AUP.

Weiti is suitable, appropriate and ready for development.



The Williams Group/AWDL is lodging this submission on two bases:

- Firstly, as a development company operating within New Zealand and wanting to inform the Council of the significant and detrimental consequence the draft FDS will have on housing affordability and the development sector within Auckland, including its ability to contribute to managing housing supply to assist in residential growth.

- Secondly, as a developer at Weiti and wanting to ensure that existing identified growth areas still have sufficient funding for necessary infrastructure to achieve their zoned purpose.

The structure of this submission is as follows:

a. Summary of Weiti and the AUP provisions;
b. Submissions on the FDS generally;
c. Submissions on the FDS's approach to Weiti:
    i. Transport
    ii. Infrastructure Funding
    iii. Natural Hazards
    iv. Stormwater
    v. Climate Change
d. Impacts of changing Auckland's growth strategy including approach to the Rural Urban Boundary
e. Requested decision.

A WEITI

3. Weiti

Weiti is a precinct located between Long Bay and Silverdale. It provides for 550 residential dwellings, large conservation areas and effectively a green belt between the East Coast Bays and Silverdale-Whangaparaoa.

Within the central Karepiro Valley and coastline of Weiti is a development of three residential villages identified within the Weiti Precinct Plan. One of these, Sub-Precinct A, is already largely developed for 150 dwellings. The other two villages are designed for intensive village settlements totalling 400 dwellings with potential for some retail and business related activity in addition.

The Williams Group has the controlling interest in Ara Weiti Development Limited who are the developers of the Weiti Sub-Precinct A and Village 1 within Sub-Precinct B.

Approximately $55 million has been spent on enabling infrastructure to service the precinct. This includes construction of 5kms of primary road access from East Coast Road, connection of trunk potable water supply, securing easements for wastewater supply lines, power and telecom, and construction of the initial wastewater line.

Williams Group has constructed key amenity areas within the Karepiro Bay including walking tracks connecting down to the Bay and beach, a public car park, and associated revegetation programmes.

Ara Weiti is preparing to implement its resource consent for the development of Village 1.

B GENERAL SUBMISSIONS

4. **Proposed Future Development Strategy**

The FDS sets out a proposed framework for urban development of Auckland. This reflects a fundamental change in the direction initially chartered through the Auckland Plan and subsequently reinforced through the Auckland Unitary Plan (AUP), the FULSS .

The effect of the FDS is to:

- Growth within the Auckland region is identified for the first ten years to be wholly contained within the existing urban area. Within that, five key locations are identified for priority funding, none of which are on the North Shore/Rodney area. The risk is that concentration of infrastructure priority expenditure could leave necessary standard infrastructure upgrades on the North Shore/Rodney area incomplete. This would work against the FDS strategy of providing for the majority of growth through urban consolidation. Budgets need to be provided to maintain existing consented zoned growth across the region.
- Fundamentally slow down, defer or remove future greenfields development in some manner suggesting that, at least until the 2030s, Auckland's growth can be successfully managed solely within the existing urban area.

This strategy stems from a series of assumptions which the submitters think are based on a flawed and incomplete evidence base, as detailed later in this submission. For example, the FDS assumes that:

- there is sufficient capacity for Auckland's projected population growth within the existing metropolitan area and the two rural towns of Pukekohe and Warkworth, including through proposed Plan Change 78;
- the future expansion of the rural urban boundary (RUB) should only be managed by the Council through a public plan change process;
- there are overwhelming natural hazard concerns, particularly flooding, which drive the abandonment of some future growth areas or at least the re-examination of greenfield areas;
- the Council's predicament on budgetary constraints and infrastructure funding; and
- the view that core infrastructure necessary to enable land development can only be funded through Council and other public processes; and therefore any new greenfield developments should be deferred given the current financial predicament.

In addition, the FDS is not based on an adequate and up-to-date Housing and Business Development Capacity Assessment (HBA). It has drawn on a 2021 HBA however this document does not include any assessment of business land capacity, and contains different

capacity assumptions to those used in the FDS. This is in contrast to the requirements of the National Policy Statement on Urban Development 2020 (NPSUD).

5. **General Comments on the FDS**

(a) The NPSUD requires the Council to prepare an FDS that provides "at least" sufficient development capacity over the next 30 years to meet expected demand. This is to provide for both residential growth and business growth.

(b) The Council, since 2011, has been promoting a balanced growth strategy for Auckland targeting both residential growth and employment/business land supply through urban consolidation, targeted greenfields expansion, and growth of Townships including Weiti.

(c) This has been consistently reinforced through the Auckland Plan, Auckland Unitary Plan, FULSS, and various Structure Plans.

(d) The Council has not implemented any public plan changes to give effect to the structure plans. The private sector, through private plan changes, has funded and provided for these developments.

(e) A number of these areas have been successfully developed following private plan changes. The inference is the current provisions and required assessments are managing environmental risk.

(f) The submitter supports the review and updating of the FULSS. The legislative imperatives require, and sound practises demand, a well-considered, thought out, tested 'future development strategy'.

(g) The primary concern with the draft FDS is that this is being rushed through seemingly due to the combined factors of infrastructural funding constraint, flooding and geotechnical issues, and the requirement to update the Long Term Plan in 2024. The impact of what is proposed in the FDS is too critical to be treated in this rushed manner.

(h) If the FDS is pursued in its current form, then it will trigger the unintended consequences of:

- Further constraining residential and employment land supply.
- Further exacerbating congestion issues in Auckland by not locating employment land close to where people live.
- Significantly and negatively impacting housing affordability through land supply constraint.
- Having a demonstrable negative impact on the economic development of Auckland and the development sector.

(i) It is accepted that the Council has financial constraints which are negatively impacting infrastructure provision. However, the solution is not to somehow try and stop greenfields development for a decade. If the problem is funding infrastructure, then the

solution is to use alternative ways to fund infrastructure such as developer funding and the use of the Infrastructure Financing and Funding Act 2020.

(j) It seems Council is working off a scenario that only the Council can fund infrastructure, rather than using other mechanisms to assist in the sustainable funding and delivery of infrastructure.

(k) In terms of capacity assumptions, the FDS is based on extreme, theoretical and unrealistic scenarios for growth potential within the existing urban area. This is assessed using 'plan-enabled' and 'feasible' capacity but fails to assess whether this capacity is reasonably expected to be realised (3.25(c) of the NPSUD). This is a fundamental oversight and completely undermines the FDS's capacity assumptions. While theoretical models can be created to imply a decade's worth of growth within the existing urban area, the reality is that this is not available, and history has proven that this level of growth has not occurred. The asserted development potential to a large extent (but accepting proposed Plan Change 78 may free up more development) has been in place for the last ten years. Urban consolidation is a significant contributor to Auckland's growth. However, it is not the complete answer. It simply does not produce enough housing; because not everybody wants to maximise the development potential of their own property. Nor does it provide the NPS UD required competitiveness margins of 20% excess capacity in the short and medium term and 15% in the long term.

(l) In addition, the FDS is based on assumptions that there will be a large uplift in capacity in urban areas from PC78. However, PC78 has been paused to allow time for Council to complete flooding and natural hazard assessments. These assessments will inevitably lead to a reduction in capacity provided for through PC78 in the existing urban area. As a result, there will be implications for the capacity required in greenfield areas to meet forecasted demand. When PC78 implies an approximately 2.345 million dwellings as a theoretical potential, it is based on assumptions that are way beyond reality.

(m) Past experience has shown that when flawed data is relied on, but the market does not deliver to those levels, it constrains housing supply which escalates price, which, for a significant portion of the community, make housing simply unaffordable. This is exactly what the NPS UD is trying to avoid. It seeks to ensure an oversupply of land so the cost of land and housing reduces.

(n) The only way to solve infrastructure is through partnership with the development community. A more agile rather than restrictive strategy is called for.

(o) The draft FDS is based on a medium growth scenario. It should be stress tested against a high growth scenario and should be tested against actual development including brownfields and greenfields development.

(p) The FDS relies heavily on urban consolidation which in turn relies on Plan Change 78 but:

- The Council has deferred Plan Change 78 one year.
- It is premature to deal with the FDS when PC78 is so uncertain.

- The investment priority targets five key areas within Auckland. However, if the very significant contribution through urban consolidation the draft FDS wants is to be achieved, then it is important to ensure that there is sufficient infrastructure spend to support these consented zoned areas for redevelopment. The benefit is the local infrastructure is paid for by the development. There is also a contribution towards the subregional infrastructure.

(q) The FDS has been prepared in isolation without adequate consultation with the development community, mana whenua, infrastructure delivery partners and funding providers.

(r) What this shows is that:

(i) Since 2011, there has been a long-established strategic policy direction on the growth for Auckland based on urban consolidation and some greenfields expansion where that is well-thought out and appropriate.

(ii) This has been embraced by the community including the development community.

(iii) Very substantial investment decisions have been made based on this Council commitment.

(iv) The implementation of this strategy has solely relied on the private sector through the development community to rezone FUZ land through private plan changes.

(v) This has delivered additional growth for Auckland.

(vi) The private sector community has funded the necessary infrastructure to service these greenfield areas. It is recognised that the Council does face future funding constraints, this is addressed below.

6. **Plan Change 78**

(a) The Council seems to be relying heavily on Plan Change 78 to provide for growth in the short term. Plan Change 78 relies heavily on the Resource Management Amendment Act 2022.

(b) It is inappropriate and unwise to rely on a plan change which is still yet to have its hearing stage, and where the Council has cast significant doubt on the appropriateness of the notified provisions by advising that almost every topic need to be revisited following natural hazard assessments.

(c) There must also be uncertainty as to the future of the plan change given the divergent political views at national level over the degree of compulsion and growth. Both the Labour and National parties have come out recently saying they will either revisit or repeal the Medium Density Residential Standards.

(d) Already the Council has slowed down this plan change process by one year. It is poor public policy practise to place so much reliance on managing such a critical factor as Auckland's growth on an untested plan change.

7. **Constraining land supply directly impacts housing affordability**

(a) The key lesson of the 2000s and mid-2010s is that constraining land supply raises land value expectations in the current owners, which in turn raise the price developers need to pay for the land, which, when passed on to the end resident, significantly raises house cost. Under supply of land distorts normal market operations.

(b) It is not the developer who is making the significant value uplift. Developer margins have been reasonably constant. It is the distortion in the market that raises hope value amongst existing rural and urban landowners, because there is a critical land supply shortage. A healthy over zoning is an important method to ensure these distortions do not occur.

(c) One of the key unintended consequences of the FDS is that it will significantly constrain land supply, which will have a further negative impact on housing affordability.

(d) This is completely at odds with direction from central government through the NPSUD which directs Councils to provide "at least" sufficient capacity and aims to improve housing affordability.

8. **A better way to solve infrastructure**

(a) The FDS effectively identifies the significant budget constraints the Council is facing and their inability to solve infrastructure. The reaction to this is to offer up only one technique which is to slow down or stop growth until the Council's financial position catches up and infrastructure can be funded. Only then does the draft FDS contemplate the release of land for growth.

(b) The fundamental flaw in this draft approach; is that the population does not stop growing and the need for employment land and housing land does not cease until the Council's financial position rectifies itself.

(c) If the problem is the provision of infrastructure, then the FDS should focus on the problem and find alternative ways of working with the private sector to solve infrastructure.

(d) Managing the pace of growth is but one tool available. It is a tool that distorts the market and undermines housing affordability, as proven over the last decade. There are other examples where private sector funding have delivered necessary infrastructure to facilitate growth.

(e) Infrastructure is fundamentally a cost to the government (and its related agencies), the Council (and its CCOs), the private development sector, and the private investment sector.

(f) Rather than constrain the entire Auckland greenfields and satellite township land release programme, a better solution is to analyse on an area by area basis and find innovative ways of funding the infrastructure to enable the release of some or all of that land.

(g) The Council needs to explore options including:

(i) private sector funding of key infrastructure to enable at least early stages of growth (Silverdale West is a strong example of where this can and should happen);

(ii) the option of partnership arrangements between private and public sector to fund infrastructure over time;

(iii) infrastructure funding agreements and the opportunity to up front pay development contributions and build in mechanisms to fund that work as others benefit from the early infrastructure investment;

(iv) Exploring how it can utilise the tools in the Infrastructure Funding and Financing Act 2020.

The FDS seems to assume none of these are applicable or workable. Equal energy should be put into identifying innovative proposals that could work on targeted growth areas.

9. **Natural Hazards are Already Adequately Controlled**

(a) There is no debate that land developed for housing or business needs to either avoid or successfully mitigate the effects of natural hazards including flooding and land stability. However, the solution is not to remove future urban zoning completely where there is "possible" hazard risk. The solution is to ensure that before a development proceeds, it has been robustly tested for vulnerability to natural hazards, and can demonstrate that any identified natural hazard risks can be avoided, remedied or mitigated.

(b) In this regard, the RMA, RPS and Auckland-wide provisions in the AUP including the approach of 'Future Urban' zoning (which requires a plan change before an area can be development) and assessment criteria that apply to any subdivision or development consent, already give the Council full ability to prevent development occurring in high risk natural hazard areas where risk cannot be successfully avoided or mitigated.

(c) There is no urgency to hurry through a rushed FDS. The existing legislative regime and AUP provisions provide all the safeguards needed. There is no need to rush anything through to plug some perceived existing gap.

(d) The existing controls are working well. The vast majority of issues that occurred in the January/February weather events occurred in areas that had been developed a substantial time ago and in existing urban and suburban areas. Those areas developed under the current AUP controls were relatively unimpacted by the storm events.

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

10. **Support for the concept of a Future Development Strategy (FDS)**

(a) The submitter accepts that a FDS is required under the NPSUD, but do not support the Council's proposed draft and consider that it is based on an inadequate and insufficient evidence base.

(b) Having a blueprint for how Auckland will grow and where and how growth will be managed is an essential informant of the market. Done right, it will direct the market to locate housing and industry in the locations that work best from a social, environmental and economic perspective.

(c) The FULSS has worked reasonably well in informing and directing the location of growth, albeit that the strategy has not been responsive enough to the pace of growth and Council has not had the resources to fully implement it.

(d) Before the FULSS is updated in the form of an FDS, a comprehensive and robust assessment of business and residential capacity and demand is needed (in the form of an HBA) which meets the requirements of the NPSUD. This means assessing business land capacity (which has not been done) and realistic residential capacity including likelihood that plan enabled capacity will be taken up. Capacity figures need to include competitiveness margins. This work will need to incorporate the findings of the Council's natural hazard and flooding work and the outcomes of PC78.

C. SUBMISSIONS SPECIFIC TO WEITI

11. **Weiti transport infrastructure**

Weiti benefits from two factors:

- It is accessed off the new O Mahurangi Penlink motorway which is a project currently commissioned and well underway. The first 1.5km of the new 5km Ara Weiti Road was constructed to the alignment and gradients of Penlink.

- The local roading down into Weiti Bay (sub precinct A) and Village 1 (sub precinct B) at Weiti is fully complete.

There is no additional cost associated with transport infrastructure for Weiti, other than the local roads within the Villages which are paid for by the development.

12. **Weiti infrastructure**

The primary potable water line has been constructed into Ara Weiti Road to a point in proximity to Village 1. The completion of potable water is fully funded by the development.

All land procurement necessary for wastewater has been procured. There will need to be some upgrades to the wastewater line through to the primary trunkline through Whangaparaoa to the Army Bay plant and outfall. The new additional line to Stillwater is fully funded by the development.

13. **Managing stormwater in Weiti**

Weiti is sensitive in terms of stormwater because of its location adjacent to the Okura-Long Bay Marine Reserve.

This development entails a particularly high (well above normal standard) enhanced stormwater management system. That is fully funded by the development.

There are no flood plain or flood risk areas within the Village 1 and Village 2 locations.

The AUP, including the Auckland-wide and Weiti Precinct provisions, contain all the tools (objectives, policies, standards and assessment criteria) to ensure that in future subdivision and development, housing and business is kept clear of land subject to natural hazards including flooding.

D. WIDER IMPLICATIONS OF FDS

14. **The impact of reversing longstanding Council commitments to growth management**

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

Significant investment has been made by multiple landowners, including the submitters, based on a consistent, repeated, reinforced Council growth strategy reflected in these documents. To be blunt, such a stark departure from a long-standing Council policy severally shakes confidence in all of the Council's long term strategy and planning documents. Aucklanders, including business owners, developers and not for profits cannot be sure which of the strategies are here to stay and should be followed, and which are merely temporary

(despite stating they are long term). This has huge implications for the future development of Auckland, which relies of private developers to meet housing demand.

These aspects are clearly contrary to the Council's stated commitment to consultation and contrary to the requirements imposed on the Council under the Local Government Act for good faith consultation on policy changes of material significance. It also appears to be contrary to the requirement under the NPSUD that the Council engage with the development sector to "identify significant future development opportunities and infrastructure requirements" when preparing the draft FDS i.e. prior to the Special Consultative Process (Clause 3.15.2(f) of the NPSUD).

The FDS will set in place a 30-year growth strategy for the Auckland region. This proposed FDS involves a fundamental change from the long-established growth pattern that has been in existence since 2011. This major change to existing long-established policy is being done with very limited public consultation prior to the proposal being published. Despite the Council's extension of the consultation timeframe, this process is of questionable legality as outlined in the attached opinion and certainly contrary to democratic processes of consultation.

15. **Understanding the timeframes to get land development ready**

In identifying the timing for land to be development ready, the Council needs to take a realistic understanding of the timeframes involved. Even on optimistic timeframes, it is a five year process between commencement of the work to create the employment opportunity, and business premises becoming operational and jobs created. Often this can extend out to closer to eight – ten years.

The process typically includes:

(a) Development consultation and adoption of a structure plan – 1 - 2 years

(b) Taking this structure plan, preparing, notifying, processing, hearing and determining a plan change – 2 years.

(c) Preparing, lodging and obtaining the necessary resource consents and engineering plan approval – 1 year.

(d) The physical land development works involving procurement, establishment, bulk earthworks, infrastructure, subdivision and titling; is typically an 18 month process, even for a relatively confined stage. That does then achieve development ready sites.

(e) The actual design, construction and commissioning of plants can be a further 18 month to 2 year process.

These are realistic, if slightly optimistic, timeframes. Very few projects would hit good timeframes at <u>every</u> stage.

The key point is that if the Council is to achieve the '*development ready*' timeframes it seeks, then the commencement of structure planning work and other aspects needs to start a minimum of five years prior and more likely eight years. This signals two issues:

The importance of creating resource up front to get the enabling provisions in place.

The infrastructure cost when services are actually required will come at occupation of the business land. There is an inherent extended timeframe, i.e. a commitment to a certain area now does not equate to when the infrastructure rolls out. The operational demand for infrastructure is at least five years later.

Furthermore, because development is staged, there is a scaling up of demand for infrastructure even once the first portions of the development are occupied.

16. **Changes to the Rural Urban Boundary (RUB) should remain a district plan level control (as opposed to a regional control as proposed within the FDS)**

(a) The suggestion that the RUB should be a *regional* rule and therefore only able to be modified effectively by the Council through a public plan change, is demonstrably a retrograde step.

(b) This approach was tested through the Auckland Unitary Plan process. That process found that a plan change to the RUB should remain a *district* matter and that it was inconsistent with the RMA to do otherwise:[1]

> *"While the desire of the Council to achieve planning certainty about growth over the next 30 years is understandable, the Panel does not consider that it promotes the purpose of sustainable management to lock in land supply and infrastructure decisions over such a long period when the environment and the needs of people are constantly changing. Resource management planning needs to be responsive to the dynamic processes of urban growth. While providing certainty can promote efficiency by reducing future process requirements, overly or unnecessarily rigid application of rules can be a hurdle or barrier to efficiency by creating additional costs.*
>
> *The Panel considers that methods aimed at sustainably providing for housing in an efficient manner should be designed to discourage undesirable behaviours, such as land banking, and encourage desirable outcomes, such as creating alternative and competitive development opportunities to meet the needs of people. A Rural Urban Boundary that is permanent for the next 30 years, subject only to the unilateral power of the Council (or a Minister) to move it, would not provide sufficient planning flexibility to adapt to changing circumstances. "*
>
> *"For these reasons the Panel recommends that the Rural Urban Boundary should remain as a method in the Unitary Plan but should be moved from the regional policy*

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

statement to the district plan. While the policy for its location should remain in the regional policy statement to maintain its strategic direction over a longer term, the location of the boundary itself should be able to be changed by a plan change at the district plan level, which can be the subject of an application by any person."

(c) The reasons why the Council's suggestion of a regional rule were rejected in 2016, are equally valid today. No modification is justified. As noted by the Panel in its Recommendation Report to the Council on the Auckland Unitary Plan

(d) The Council's track record in implementing greenfields development through plan changes under the FULSS is very limited. The only public plan change that the Council promoted giving effect to the FULSS was Whenuapai. Even then, the Council ended up withdrawing that plan change. No public plan changes have been promoted that would give effect to the current growth strategy. Every greenfields development has relied on a private sector initiative and a private plan change.

(e) Being able to deliver these critical plan changes to provide for growth, is essential. Since 2017, the Council has relied on the private sector to do this. In a time where the Council is signalling severe financial constraints, what confidence can the community or the sector have that the Council can and will deliver on these changes.

E. REQUESTED DECISION

17. The submitters request:

(a) the Council pause the current programme on the FDS;

(b) there be meaningful consultation with the community including the development sector;

(c) some key principles be agreed including:

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

(ii) this will continue the combination of urban consolidation, greenfields development, and the expansion of satellite townships;

(iii) growth needs to be serviced by adequate infrastructure;

(iv) that infrastructure can be supplied through a broad range of options including innovative methods and participation by the private sector (investment and development);

(v) stormwater and flood plain management are important factors and need to be considered in the release of land, but recognising different appropriate methods to manage such land.

(i) apply those principles on an area by area basis to identify the release of land;

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

(e) enable the private sector to deliver the range and quality of urban growth that is good for the community and which the NPSUD and RPS aspire to;

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

(g) That any new iteration of the FDS include the Weiti Precinct area as a committed growth area. The Weiti Precinct is currently zoned for 550 residential lots, it is a live zone, has existing development already completed (sub-precinct A), and has resource consent for sub-precinct B in place.

Future Development Plan 2023 #8619

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

Your feedback

Focusing growth

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

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

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

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

Other

Tell us why
Please see attached submission

Accessible local centres

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

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

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

Other

Tell us why
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
Please see attached submission

Resilient infrastructure

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

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

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

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

Tell us why
Please see attached submission

Other feedback

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

Please see attached submission

#8619

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Feedback by the New Zealand Defence Force (NZDF) on the Auckland Future Development Strategy (FDS) 2023-2053 is set out below.

1. The Minister of Defence is the requiring authority for 14 designated sites in the Auckland region, including Royal New Zealand Air Force (RNZAF) Base Auckland located in Whenuapai, Devonport Naval Base, Papakura Army Camp and Ardmore Military Training Area. NZDF's key interests regarding the FDS relate to mitigating risks arising from potential new development on the current and future operation of NZDF facilities, and ensuring Defence capability is not compromised by new development. Reverse sensitivity is a significant issue and focus for NZDF.

2. NZDF seeks to ensure that reverse sensitivity effects arising from new development does not impact the safe and efficient operation of existing infrastructure, including Defence facilities. It is essential that the FDS does not envisage development that is incompatible with existing infrastructure. To achieve that, the FDS must explicitly recognise:

    a) the importance of existing infrastructure (including Defence facilities) and the need for its continued safe and efficient operation;

    b) the risk of reverse sensitivity effects on existing infrastructure posed by incompatible development, and the need to avoid incompatible development;

c) that infrastructure can have effects (such as noise), designations and planning controls that extend beyond physical site boundaries (including approach and departure path designations and aircraft noise overlays), which may constrain development potential and impact land use outside of physical infrastructure boundaries; and

d) constraints as per (c) are important inputs into Council's spatial response as they affect development capacity and where growth is or is not appropriate; they should be spatially identified as key constraints on development.

3. NZDF is a significant stakeholder regarding development in Whenuapai because of the long-standing presence, operation and significance of RNZAF Base Auckland. RNZAF Base Auckland was established in 1937 and occupies a significant portion of the Whenuapai area (approximately 311 hectares). It is nationally and regionally significant infrastructure. Relevant to Principle 3 regarding efficient and equitable infrastructure investments, RNZAF Base Auckland represents a significant and long-term Government investment in infrastructure. Ensuring that RNZAF Base Auckland can safely and efficiently operate now and into the future to meet Defence purposes under the Defence Act 1990 is critical.

4. RNZAF Base Auckland is located close to an existing urban area identified as a spatial priority area for investment (years 1-10 and 11-30). The land surrounding RNZAF Base Auckland is zoned Future Urban under the Auckland Unitary Plan (Operative in Part). It is essential that future development and land use in Whenuapai is not incompatible with the current and future operation of RNZAF Base Auckland, and that planning constraints associated with it (including approach and departure path designations and aircraft noise overlays), are a key input into identifying where and what development in Whenuapai is and is not appropriate.

5. Development in Whenuapai is currently occurring, or proposed to occur, in a piecemeal fashion and in advance of the necessary infrastructure to support this development. NZDF has been, and is, engaged in numerous ad-hoc, uncoordinated statutory planning processes (resource consent applications and private Plan Changes) under the Resource Management Act 1991 and the Covid-19 Recovery (Fast-track Consenting) Act 2020 for development adjacent to and in close proximity to RNZAF Base Auckland. A more coordinated and integrated approach to appropriately manage development and potential reverse sensitivity effects on RNZAF Base Auckland is required, and NZDF wishes to be involved in further discussions with Auckland Council in this regard.