# Future Development Strategy

## Organisations

## WRITTEN FEEDBACK
## Volume 19

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

# Future Development Plan 2023 #8632

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

**#8632**

Level 31, Vero Centre
48 Shortland Street
Auckland, New Zealand
PO Box 1509
Auckland 1140
+64 9 307 2172
**W** ellisgould.co.nz

31 July 2023
**Sent by Email**

Auckland Council
Private Bag 92300
Victoria Street West
Auckland 1142

E-mail: futuredevelopmentstrategy@aucklandcouncil.govt.nz

**Submission on the Draft Future Development Strategy – Foodstuffs North Island Limited**

We write on behalf of Foodstuffs North Island Limited ("**Foodstuffs**") to make the following submission on Auckland Council's Future Development Strategy 2023 ("**FDS**").

***Introduction and Relief Sought***

1. Foodstuffs welcomes the opportunity to submit on the FDS and, in summary, seeks the following relief:

   (a) **That Council arranges an opportunity for <u>all</u> interested parties to make oral presentations to the councillors and or independent commissioners following the filing of submissions on 31 July.**

   (b) **That the Council's focus on "*nodes*" and "*strong centres*" is applied to all identified Metropolitan, Town and Local Centres.**

   (c) **That the FDS enables and encourages increases in height standards applying to all centres and records that the geographical extent of existing centres may be increased as they are intensified.**

   (d) **That the FDS records Council's intention to work cooperatively with landowners and developers to facilitate development opportunities when they arise, subject to the application of appropriate provisions regarding amenity and urban form.**

   (e) **That the FDS promotes the prioritisation of infrastructure capacity funding to serve all Metropolitan, Town and Local Centres.**

   (f) **That the FDS recognises that the intensification of Auckland needs to be accompanied by increased opportunities for supermarkets of all sizes to establish in convenient locations and in particular supports changes to the Unitary Plan to enable full-service supermarkets to establish within the Light Industry zones as Discretionary Activities, at least on sites adjacent to arterial roads and on sites that are in close proximity to residential zones.**

2. The submission will address the following matters:

   (a) Background – Foodstuffs' interest in the FDS.

   (b) Issue 1: The FDS process.

   (c) Issue 2: The importance of enabling greater intensification in centres.

   (d) Issue 3: The importance of Council prioritising investment in infrastructure capacity in areas where that will generate the greatest benefit, including all Metropolitan, Town and Local Centres.

   (e) Issue 4: The need to enable full-service supermarkets to establish (as Discretionary Activities) within the Light Industry zones:

***Background - Foodstuffs' interest in the FDS***

3. Foodstuffs is a cooperative that owns, operates and develops supermarkets (Pak'n Save, New World and Four Square) and mixed-use developments in locations throughout Auckland.

4. Supermarkets are the most efficient way of supplying groceries to customers. They enable customers to obtain a full range of groceries from a single outlet in close proximity to their place of work, their home, or a conveniently located arterial route. Supermarkets promote transport efficiency, and minimise the time and energy involved in purchasing and transporting groceries.

5. There is a direct relationship between the quantity of supermarket floorspace that needs to be implemented in the City (in a range of supermarket sizes and offers) and the population being served by those stores. Accordingly, as Auckland intensifies and expands, additional supermarkets will need to be developed. Given that the Auckland Unitary Plan, NPS – Urban Development 2020 ("**NPS-UD**") and FDS all anticipate ongoing intensification within the existing urban area, the Council needs to implement strategies that enable a full range of supermarkets (from large full-service Pak'n Save supermarkets to smaller metro stores) to develop in close proximity to the incoming population within the existing urban areas, both in centres and in other convenient locations.

6. Foodstuffs' submission identifies ways in which the FDS can facilitate that development, which is a necessary consequence of the quality compact city model adopted by Council.

***Issue 1: The FDS Process***

7. The consultation process undertaken to date by Council on the FDS is inadequate and leaves it exposed to judicial review proceedings.

8. **Foodstuffs asks Council to arrange an opportunity for <u>all</u> interested parties to make oral presentations to the councillors and or independent commissioners following the filing of submissions on 31 July**. That may require a number of hearing days.

9. The FDS is a major strategic planning document for the region and includes substantive departures from the Future Urban Land Supply Strategy. It is potentially an extremely important document, both for Council and the development community but it will only be successful if it reflects a pragmatic and workable consensus between Council and the private sector regarding the key strategic elements that will inform the accommodation of growth in Auckland over the next 10-20 years.

10. Foodstuffs is aware that the FDS proposes significant reductions in development opportunities in parts of the current Future Urban Zone and that this may lead to judicial review proceedings. Other aspects of the FDS will also have significant implications for the urban form of the city.

Despite those far-reaching consequences, the FDS is not subject to the formal submission, hearing and appeal process that applies to Unitary Plan provisions. It is, therefore, essential that Council provide an opportunity for affected parties to make oral submissions to the key decision-makers, namely councillors.

11. Regulation and strategic documents themselves do not generate development and when inappropriately drafted can stifle it. Most of the investment in Auckland is from the private sector. Accordingly, there needs to be a commonality of views between the public and private sectors if the FDS is to facilitate development that is of high quality, feasible and appropriately located. The FDS is an opportunity for Council and stakeholders to work towards an agreed goal but in order for that to occur the Council needs to listen closely to the views expressed by the development community. That, in turn, requires Council to give the community an opportunity to speak and interact.

12. With regard to the current process:

    (a) Council scheduled a session on Friday 21 2023 July at which some parties with an interest in the FDS were able to speak briefly with Council members regarding their concerns. Council staff compiled a lengthy "*waitlist*" of parties (including Foodstuffs) who wished to present but were not allocated a speaking slot. Foodstuffs was able to present at the end of the day as a consequence of one submitter's non-attendance. The existence of the waitlist is, however, an indication that the consultation session was inadequate and that Council should have scheduled a significantly longer session for public input.

    (b) Written submissions on the FDS close on 31 July 2023. Scheduling an opportunity for submitters to present their positions in detail thereafter may well assist in resolving differences of opinion and reducing the prospect of ongoing litigation in the High Court.

    (c) For context, Council and submitters have already this year held 10 working days of hearings on introductory aspects of PC 78 to the Unitary Plan. Substantive hearings on PC 78 have yet to begin. In that context, it is appropriate for Council to set aside at least a number of days to hear from submitters on the FDS, given its strategic importance.

    (d) In summary, the issues raised by the FDS are both complex and strategically important, and the current consultation process is inadequate given that interested parties are being denied an opportunity to present to Council. A failure on Council's part to institute a meaningful and effective consultation process will leave it exposed to judicial review. That procedural failure will exacerbate the inadequacy of the analysis undertaken by Council in support of the FDS and in particular the lack of justification for removing development opportunities anticipated under the Auckland Unitary Plan (e.g.: through the proposed reductions in the Future Urban zone).

13. The approach undertaken by Council with respect to the FDS is illustrative of a broader theme that has been apparent since the Unitary Plan was made operative:

    (a) For example, Council has generally responded negatively to private plan changes, has taken a constrained and negative approach to PC 78 (being the Intensification Planning Instrument required under the RMA to give effect to the NPS-UD and MDRS), and has its Development Contributions Policy 2023. In each case, the Council sought to oppose the relief sought by the developer community or to impose punitive obligations that appear designed to prevent development occurring.

    (b) Foodstuffs considers that Council's approach to development and the development community needs to be altered significantly. Development opportunities only arise when a number of factors align, including land tenure, landowner or developer expectations,

market conditions, the availability of finance, and the regulatory framework. Sites that are ripe for redevelopment will, typically, not stay undeveloped whilst the Council waits for the perfect moment and form of development to arise. Instead, landowners will make decisions based on the options available to them. Once those decisions are implemented it is typically 50 years or more before consideration is given to redevelopment.

(c) In that context, it is essential that councils respond positively when developers present opportunities for intensification or appropriate peripheral development. Put simply, Council should endeavour to work with and not against landowners and the development community.

***Issue 2: The importance of enabling greater intensification in centres***

14. The FDS (e.g.: pages 19, 48 and 51) discusses the strengthening of "*sub-regional nodes*" which include the City Centre, Albany, Westgate and Manukau. These centres are identified as playing an important role in providing greater subregional sustainability. They include three of the 11 Metropolitan Centres. [Nb: confusingly, the FDS also refers to "rural *nodes*" which are much smaller in scale and less important strategically than the sub-regional nodes.] The FDS (e.g.: pages 16 and 34) also supports focusing development in and around what it calls "*strong centres*".

15. **Foodstuffs strongly supports that focus on the City's existing centres. It considers, however, that this focus should apply to <u>all</u> identified Metropolitan, Town and Local Centres. That will help to support create a network of mutually complementary centres, connected by a strong public transport network**. By way of explanation, Foodstuffs considers that:

(a) A compact urban form enables residents to live closer to places of employment, education, healthcare, and services such as retail. That reduces the need for travel and supports the use of public transport and active transport modes.

(b) Intensification around all centres will support those outcomes while enabling the centres to increase in scale, economic activity and viability, diversity of economic, social and cultural activities, and vibrancy.

(c) A compact urban form enables the sharing of key infrastructure such as urban roading and wastewater and water supply networks and reduces the marginal cost of construction for such infrastructure, albeit that the capacity of trunk wastewater and water networks may need to be increased.

(d) Intensification, particularly through multi-storey development, reduces the total extent of impermeable surfaces (having regard to roading as well as building coverage) and, consequently, reduces the quantum of total stormwater runoff from urban development.

(e) Collectively, that enables an urban form that, overall, is more efficient, connected and supportive of residents while reducing or avoiding the adverse effects and inefficiencies that can arise from less compact forms of development. Those benefits will be optimised if the FDS is modified to enable more intensive development within and immediately around all centres.

(f) There is no rationale for emphasising only a selection of the zoned centres beyond the hierarchy inherent in the allocation of Metropolitan, Town and Local Centre zonings. The FDS should recognise the existing and potential future role played by those centres that: currently have the greatest concentration of activities; are well located with reference to the logical dispersal of centres through the city; and are most conveniently located with reference to the transport network and employment opportunities.

16. **Foodstuffs considers that the FDS should enable and encourage increases in height standards applying to all centres and to record that the geographical extent of existing centres may be increased as they are intensified**. By way of explanation:

(a) With the intensification of residential development that is occurring around centres and along corridors pursuant to the Unitary Plan (and is encouraged in the NPS–UD), the existing centres will need to contain a greater concentration of retail, entertainment, food and beverage, office and service activities. They will also provide an opportunity for co-locating residential and commercial activities.

(b) Given that supermarkets require a relatively large footprint and that intensification is increasing the value of land in centres, additional height is essential if supermarkets are to be viably established in centres. Greater height will encourage mixed use development and will enable land and construction costs to be amortised over a larger number of floors and hence greater floorspace.

(c) In that context, it is appropriate for the height standards governing centres to increase. That is currently being promoted through PC 78 as notified, and additional height has also been sought by submitters (including by Foodstuffs) for a number of centres.

(d) In some centres, the level and extent of development is such that it is appropriate for the geographical extent of the centre to also be increased. Again, that has been sought in some submissions on PC 78. In many cases, however, market and tenure conditions required to facilitate intensification or expansion of centres only become apparent between plan reviews. It is therefore important that Council is open to enabling additional development opportunities (whether by way of increases in height standards or through increasing the extent of a Centre zone) on specific sites by way of private plan changes.

(e) Development of land in urban areas happens in cycles and land will typically become available for redevelopment every 50 or 60 years. If those development opportunities are to be taken up, councils need to be ready to work with landowners and developers to enable and assist them to undertake significant development as and when they are prepared to do so. Failure to do so will commonly result in land being developed economically but in a form that does not maximise public benefit or the quality compact urban form that Council seeks.

(f) That requires Council being open to proposals from developers rather than simply applying pre-existing standards and expectations. **Foodstuffs asks that the FDS records a willingness to work with landowners and developers when opportunities arise**.

***Issue 3: Prioritisation of infrastructure capacity investment in centres***

17. The FDS (e.g.: pages 6, 13, 19, 20, 23, 34, 36, 40, 51-53, 58, and Appendix pages 57 and 58) refers to investment being prioritised in areas that will receive the greatest benefits, and identifies three spatial priorities – "*nodes*", "*local areas and communities*" and "*joint priorities between council and central government*".

18. **Foodstuffs strongly supports the prioritisation of infrastructure funding but considers that the terminology used in the FDS is not as clear as it should be**:

(a) **"*Nodes*" should be expanded to comprise all Metropolitan and Town Centres.**

(b) **"*Local areas and communities*" is a very loose description. The FDS should expressly record that all Metropolitan, Town and Local Centres are prioritised for investment,**

**albeit at a scale that reflects the relative importance and readiness for intensification.**

(c) **"*Joint priorities between council and central government*" is a logical determinant of investment. Foodstuffs understand this to include areas such as Drury which have been identified by central and local government as being a priority.**

19. **Foodstuffs asks that the FDS be amended to explicitly prioritise the provision of additional infrastructure capacity into the existing centres hierarchy.**

20. The existing infrastructure in the city (most notably water supply, wastewater reticulation and stormwater management) does not have sufficient capacity to cater for the level of intensification that is enabled under the operative Unitary Plan provisions, let alone the greatly increased intensification that would be enabled under PC 78.

21. As required by the RMA (as amended in 2021), PC 78 implements both extensive additional Terrace Housing and Apartment Building zoning around centres and the implementation of Medium Density Residential Standards ("**MDRS**") across much of the city. As a consequence, PC 78 broadens significantly the geographical areas within which intensification may occur but does not itself generate additional demand for development. Accordingly, the same number of additional residents will need to be accommodated in the city over time, but that development will be able to occur over a broader area and in a less concentrated way than would otherwise occur.

22. The likely consequence of the extensive intensification enabled under PC 78 is that infrastructure providers will be unable or unwilling to identify where to pro-actively focus future investment to increase infrastructure capacity, as intensification could occur almost anywhere in the city. In that context:

(a) Infrastructure providers will not be able to fund or implement the improvements in capacity required throughout the city to enable the proposed THAB zonings and MDRS to be realised without constraining development in centres.

(b) Infrastructure providers could decide to invest reactively (i.e.: in response to development patterns that arise). That approach would be the antithesis of the form of development encouraged in the Unitary Plan and the NPS-UD, which prioritise development in and around centres and the coordination of development with infrastructure.

(c) Even if the infrastructure providers could fund all the additional capacity needed to cater for potential growth patterns, that would be an inefficient use of resources because it is not possible to identify where the additional capacity will be required and hence to coordinate the level of investment with the demand for additional services that will in fact arise.

(d) The existing networks do not necessarily provide greater capacity to centres than to residential areas or even distinguish between them. Thus, PC 78 may in practice result in intensification that occurs in locations remote from centres (e.g.: through the MDRS or through development on peripheral THAB zone areas) being allocated infrastructural capacity in preference to subsequent development proposals within centres, which might be denied access to the infrastructure. That first-in, first-served approach raises a risk that it is intensification within centres (which can most efficiently accommodate growth) that might be precluded from occurring because less efficient, peripheral development has taken up the available capacity. That would compromise the achievement of the growth strategy inherent in the NPS-UD and the Unitary Plan.

(e) The FDS should, therefore, explicitly support the prioritisation of development in centres and along corridors. Explicitly prioritising infrastructure capacity investment in and around centres will give infrastructure providers clarity as to where to focus investment.

(f) By way of illustration, Watercare Services Limited has given evidence on PC 78 that there is sufficient "*bulk*" or "*trunk*" capacity for water and wastewater to cater for the anticipated growth in Auckland. It has not given any assurances, however, as to the ability of the existing pipe networks between those trunk lines and the zoned centres to cater for the extent of intensification and development that can currently be undertaken within those centres. The likelihood any existing shortfalls in such local capacity being rectified will reduce in the absence of priority being given to the centres over the servicing of the wider urban area where development may occur under the MDRS.

***Issue 4: Provision for supermarkets in the Light Industry Zone***

23. **Foodstuffs asks that the FDS be amended to explicitly recognise that the intensification of Auckland needs to be accompanied by increased opportunities for supermarkets of all sizes to establish in convenient locations and in particular to support changes to the Unitary Plan to enable full-service supermarkets to establish within the Light Industry zones as Discretionary Activities:**

(a) **On sites adjacent to arterial roads; and**

(b) **On sites that are in close proximity to residential zones (i.e.: are close to the periphery of the Light Industry zones).**

24. The purchase and consumption of food and other groceries is an essential component of modern life and unlike most other forms of retail, generally occurs on a weekly and increasingly more frequent basis. Supermarkets provide a convenient and efficient means of making those goods available to the public and constitute a significant part of the grocery sector and amenity for the community.

25. There is a direct relationship between the quantity of supermarket floorspace that needs to be implemented in the city (in a range of supermarket sizes and offers) and the population being served by those stores. Accordingly, as Auckland intensifies and expands, additional supermarkets will need to be developed. Given that the Unitary Plan, NPS-UD and FDS all anticipate ongoing intensification within the existing urban area, the Council needs to implement strategies that enable a full range of supermarkets (from full-service to metro) to develop in close proximity to the incoming population within the existing urban areas. Foodstuffs considers that it is most unlikely that there will be sufficient capacity within and immediately adjacent to existing centres to enable the establishment of the numbers of additional supermarkets that will be required in the future.

26. With time, increased urbanisation in and around centres and transport nodes will create additional opportunities for smaller (metro) stores to develop. That is not expected to cause demand for large full service supermarkets (e.g.: full size Pak'n Save and New World supermarkets) to fall away, however – there will still be high demand for large full service stores with convenient parking at which shoppers can make large regular purchases. A metro store is extremely convenient for an office worker or resident who will travel by foot but it is not convenient for a weekly or fortnightly "*main-order*" shop and customers will still need to visit full service supermarkets. If Foodstuffs cannot provide those supermarkets in convenient locations, then customers will simply drive further, thereby adding to traffic congestion in the city.

27. Whilst full service supermarkets commonly establish in centres, they do not need to rely on other retail users for their viability and can be successful on a stand-alone basis. In Foodstuffs' case, its out of centre supermarkets are almost always stand-alone (for example, New World Howick, Pak'n

Save Wairau). Foodstuffs' objective is to locate stores on visible, convenient and easily accessed sites close to residential activity. In the future, that will increasingly necessitate sites located between centres as we already have supermarkets in most of the centres that are zoned.

28. The population growth anticipated for the Auckland region will require, inevitably, the development of many more supermarkets in the region. Some of those supermarkets will be of smaller formats but NTC will also need to develop many large format full service supermarkets in both the New World and Pak'n Save formats. Foodstuffs' analysis is that Auckland will require in the order of 60-70 additional supermarkets (of all brands) over the next 30 years, many of which will be full service supermarkets.

29. Supermarkets are currently present in almost all Metropolitan, Town and Local Centres. In the rare situation where they are absent from a centre, it is almost always because it has proven too challenging for the supermarket operators to locate, purchase and develop an in-centre site.

30. Full service supermarkets are large retail shops which attract a large number of customers on a regular basis, have high delivery and service needs and require extensive areas of land to be developed. With the increasing cost of land in Auckland's urban area, innovative solutions such as grade-separated car parking and the development of other activities (e.g.: residential or offices) above retail shops are being implemented to achieve economically viable projects. Even with innovation, however, it is becoming increasingly difficult to obtain sites in centres that are physically able to accommodate new full service supermarkets.

31. There is very limited opportunity in most centres to develop additional large format retail. Foodstuffs therefore looks to locate on sites at the edge of centres (e.g.: in the General Business, the Mixed Use zone and on Identified Growth Corridors). All of those locations pose practical and planning challenges, however (e.g.: related to the scarcity of land, the lack of sites of suitable size and shape, and planning status). In practice then, Foodstuffs needs to look elsewhere (i.e.: outside the centres, General Business zones, Mixed Use zones and Identified Growth Corridors) to locate at least a significant proportion of its new full service supermarkets. The most obvious location is the Light Industrial zone as it is very extensive and, in many cases, well located with respect to residential catchments. In practice the Light Industrial zone is the only feasible location for new full service supermarkets in many parts of Auckland.

32. The pace of growth in Auckland is significant. Whereas previously Foodstuffs has land-banked sites in anticipation of growth and had been prepared to seek a zoning change in time, the rate of growth anticipated for Auckland (and the fact that much of it is to be accommodated via intensification rather than peripheral development) means the company now has to plan for growth and new store development at a faster pace. It will be extremely difficult for Foodstuffs to make strategic decisions with respect to land purchases and to meet the demand for supermarkets as a result of that growth through its network planning if supermarkets remain a Non-complying Activity in the Light Industry zone.

33. Foodstuffs accepts that any proposal to establish in a Light Industry zone would need to be assessed against a full range of resource management effects. For that reason, it suggests full Discretionary Activity status and a policy that expressly identifies issues in terms of effects on centres, traffic and surrounding industrial activities. Such a policy and rule framework would remove some of the uncertainty generated by Non-complying activity status while still requiring any proposal to satisfy Council that adverse effects will be managed appropriately.

***Conclusion***

Foodstuffs looks forward to presenting evidence and legal submissions in support of this submission, whether to a Council committee or to independent commissioners who are retained by Council to hear presentation by interested parties and to make decisions or recommendations with regard to the content of the FDS.

Yours faithfully

[redacted]

# Future Development Plan 2023 #8633

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?**

#8633

# Waka Kotahi Submission on the Draft Auckland Future Development Strategy

Auckland Council Future Development Strategy Have Your Say Event

Friday 28 July

WAKA KOTAHI
NZ TRANSPORT AGENCY



Te Kāwanatanga o Aotearoa
New Zealand Government

# Introduction

Waka Kotahi welcomes the opportunity to provide feedback through our submission on the Draft Auckland Future Development Strategy (FDS).

- Randhir Karma, *Regional Manager System Design (Auckland/Northland)*
- Brian Waddell, *Lead Strategic Planner (Auckland Northland)*
- Nita Chhagan, *Principal Planning Advisor*



# Why are Waka Kotahi interested in the FDS?

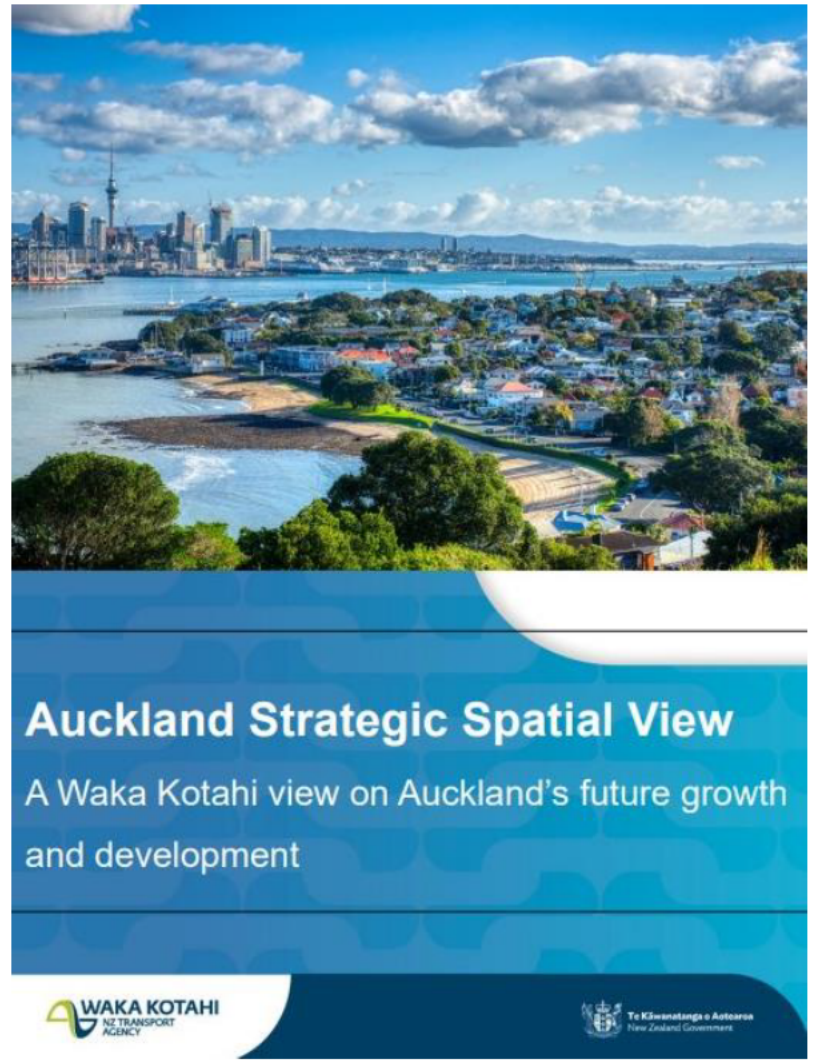
To deliver on Government outcomes (including those set by the GPS Transport, Emission Reduction Plan, National Adaptation Plan, NPS-UD and the MoT Transport Outcomes Framework)

Waka Kotahi has developed a number of strategies and plans relevant to the FDS. These include:

- **Arataki – our 30 Year Plan**
- **Toitū Te Taiao (our sustainability action plan)**
- **Tiro Rangi (our adaptation plan)**
- **Urban Development Position statement**
- **Auckland Strategic Spatial View**

Waka Kotahi generally support the direction of the Consultation Draft of the Auckland Future Development Strategy which aligns with our strategic direction

Waka Kotahi Urban development position:
***"We actively support, enable and encourage quality, mixed-use, compact urban development that efficiently uses land, reduces travel distances and lowers reliance on private vehicles to enhance people's lives."***



# Key submission point

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

- Include the key challenge of **emissions reduction** which recognises the significant role that land use and transport integration plays in reducing emissions.
- We seek clarity on the relationship between the **strategic spatial framework** and the outcome and directions of the **Auckland Plan 2050**.

| Future Development Strategy Strategic Spatial Framework | |
|---|---|
| Our vision | Auckland's built environment will underpin the development of prosperous, inclusive, and vibrant communities. Quality development will help to regenerate the environment and deliver our commitments to greenhouse gas emission reduction as we grow and change. |
| Te Tiriti | Honouring Te Tiriti o Waitangi and enabling Te Tiriti outcomes |
| Hapū and iwi values and aspirations for urban development | Mauri, Rangatiratanga, Mana Motuhake, Mātauranga Māori, Kaitiakitanga, Manaakitanga |
| Over-arching challenges | 1. Spatial planning in an uncertain and changing environment<br>2. Halting the ongoing degradation of the natural environment<br>3. Achieving equitable growth and change<br>4. Investing in infrastructure in a financially constrained environment |
| Spatial outcomes | • Tāmaki Makaurau is viewed as an interconnected living system<br>• Development achieves high quality living environments<br>• Disparities in our communities and investments are addressed<br>• Development results in resilient built systems, natural environment and communities |
| Principles for a quality compact approach to growth and change | 1. Support greenhouse gas emission reduction<br>2. Adapt to the impacts of climate change<br>3. Make efficient and equitable infrastructure investments<br>4. Protect and restore the natural environment<br>5. Enable sufficient capacity for growth in the right place at the right time |
| Inputs to our spatial response | Conceptual growth scenarios<br>Constraints on development<br>Development capacity |
| Our spatial response | Spatial scales<br>Spatial environments<br>Prioritising areas for development<br>Approach to natural hazard constrained areas |
| Implementation | Actions to implement this Future Development Strategy |

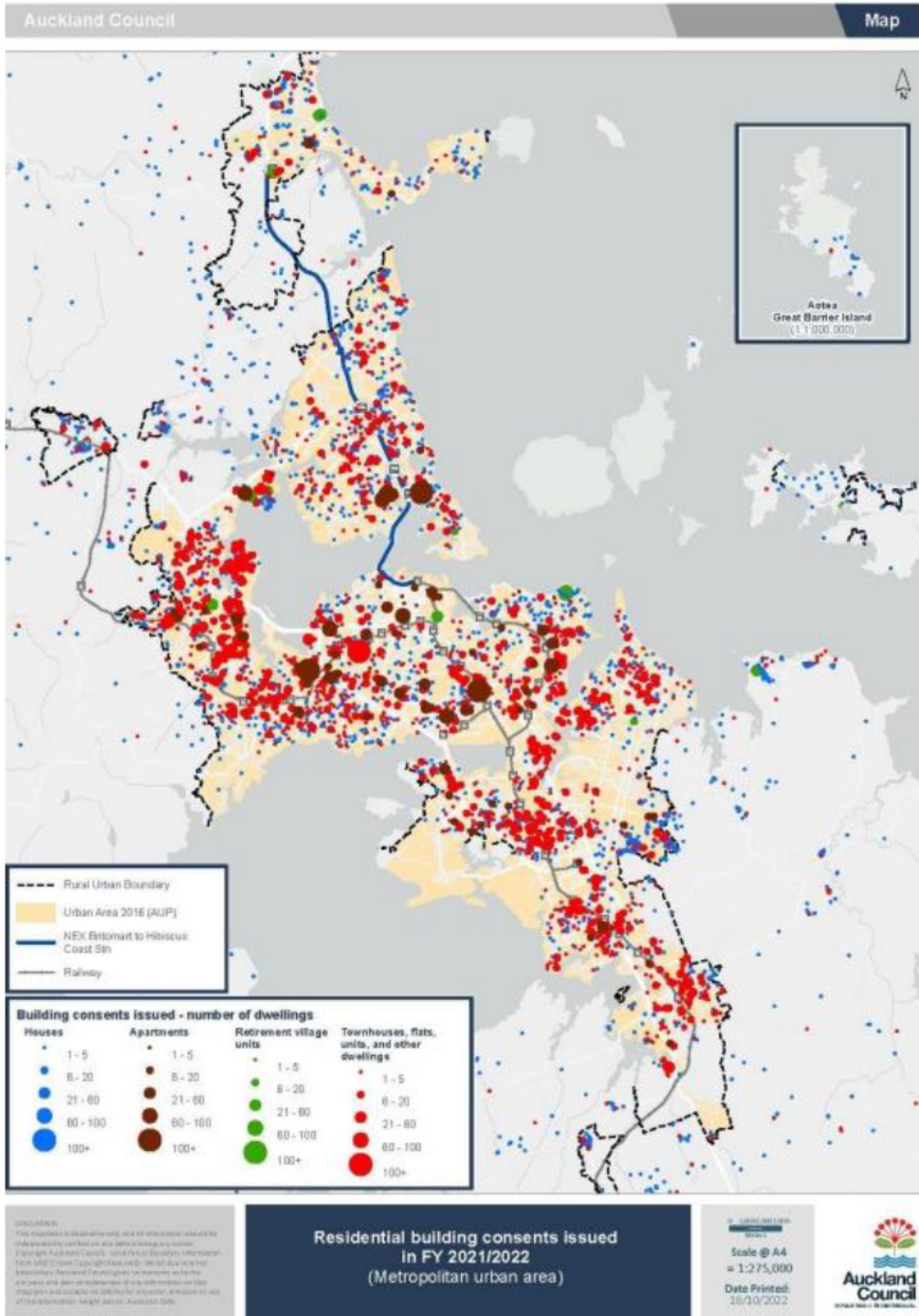
#8633

# Key submission point

## Support the update to the quality compact approach.

- As it provides a greater degree of intensification in existing urban areas, along with less reliance on expansion into future urban areas
- Successful uptake of the Auckland Unitary Plan Mixed Housing Suburban and Urban zones.
- For each of the last five years, over 80% of growth has happened within existing urban areas (FDS Evidence Report)
- Waka Kotahi Auckland Strategic Spatial View:

  *A greater share of Auckland's future growth will occur through brownfield intensification than previously anticipated. This shift should be encouraged through supporting intensification and delaying urbanisation in some major planned greenfield areas.*



# Key submission point

## Waka Kotahi supports land-use decisions that reduce trip lengths and focus growth in areas with better travel choice

- Existing urban areas have greater travel choice and generate shorter average trip lengths.
- Land use patterns (the location and density of homes, jobs, services etc.) determine the scale and type of travel demand

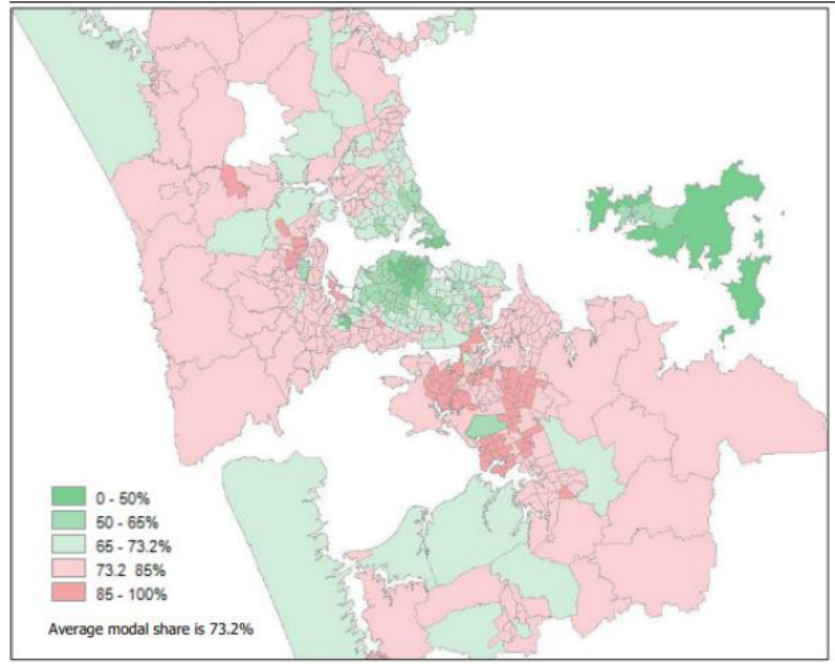



**Figure 18.1**
**Private car mode share by residents 2018 (per cent of total trips)**

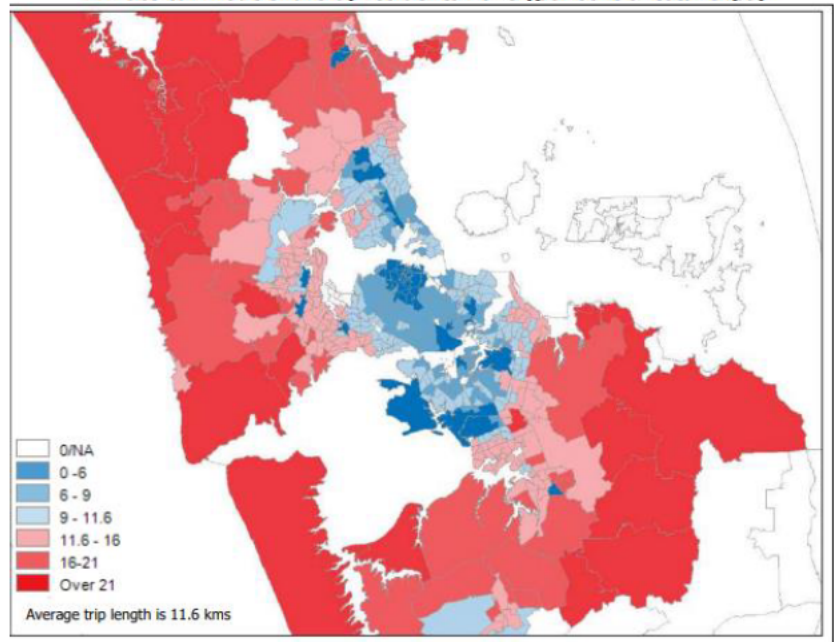


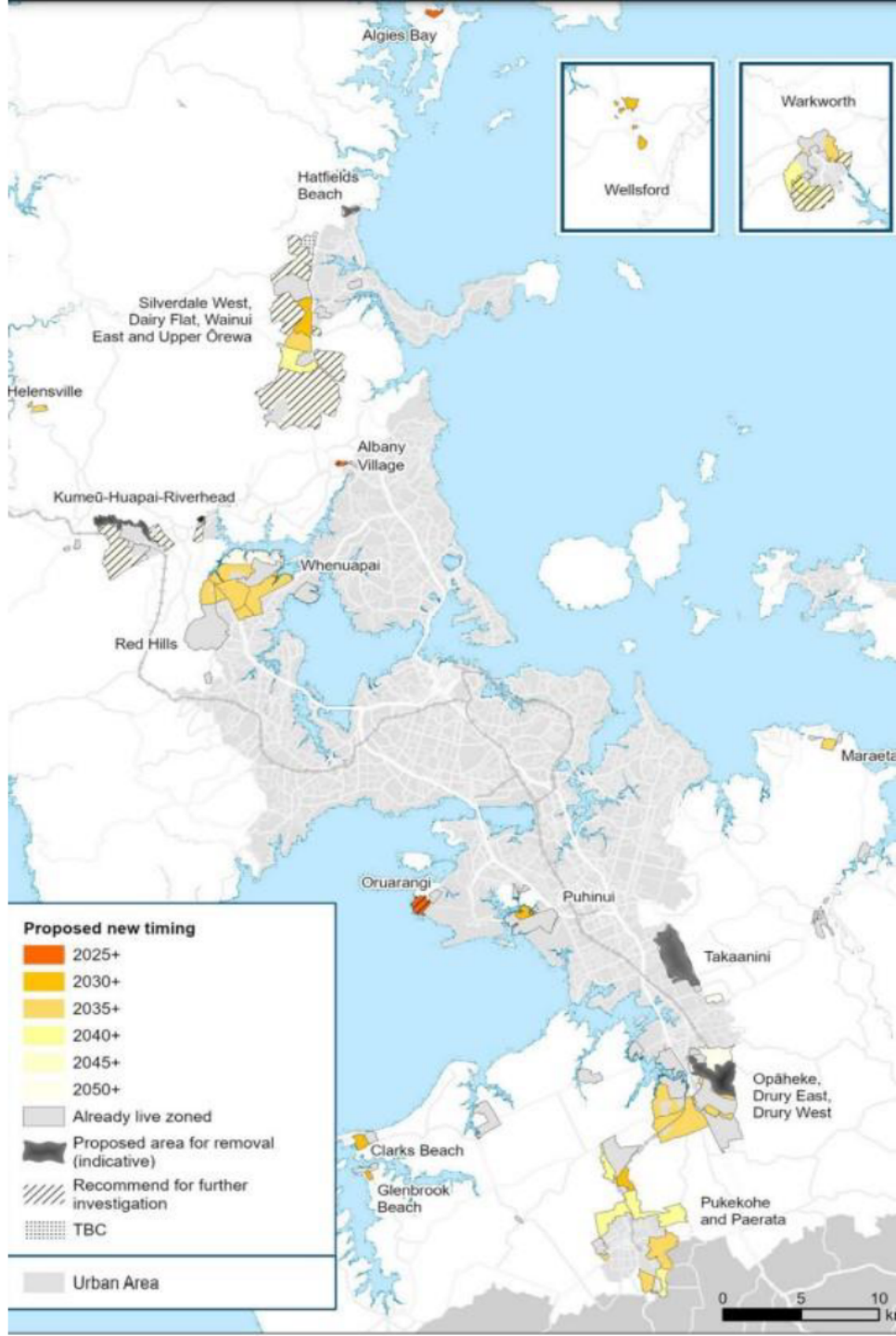

**Figure 18.11**
**Average trip length by origin (kms)**

Source: https://at.govt.nz/media/1985124/census-report-analysis-of-the-2018-census-results.pdf

# Key submission point

## Support the Future Urban Land Supply Strategy being incorporated into the FDS and broadly support direction indicated in draft FDS

- Support **areas for removal** where supported by strong evidence demonstrating major hazards
- Support **urbanisation being sequenced to align** with infrastructure provision in particular public transport infrastructure.
- Support **infrastructure projects/triggers** to illustrate phasing
- Support the **timing indicated for the Northwest which aligns with provision of rapid transport infrastructure**
- **Significant transport investment has been made to service Drury** and we query why significant other parts of Drury have been postponed to 2035+.
- **Areas for investigation,** could have implications for future planning work.
- We recommend these investigations are **resolved as quickly as possible.**



#8633

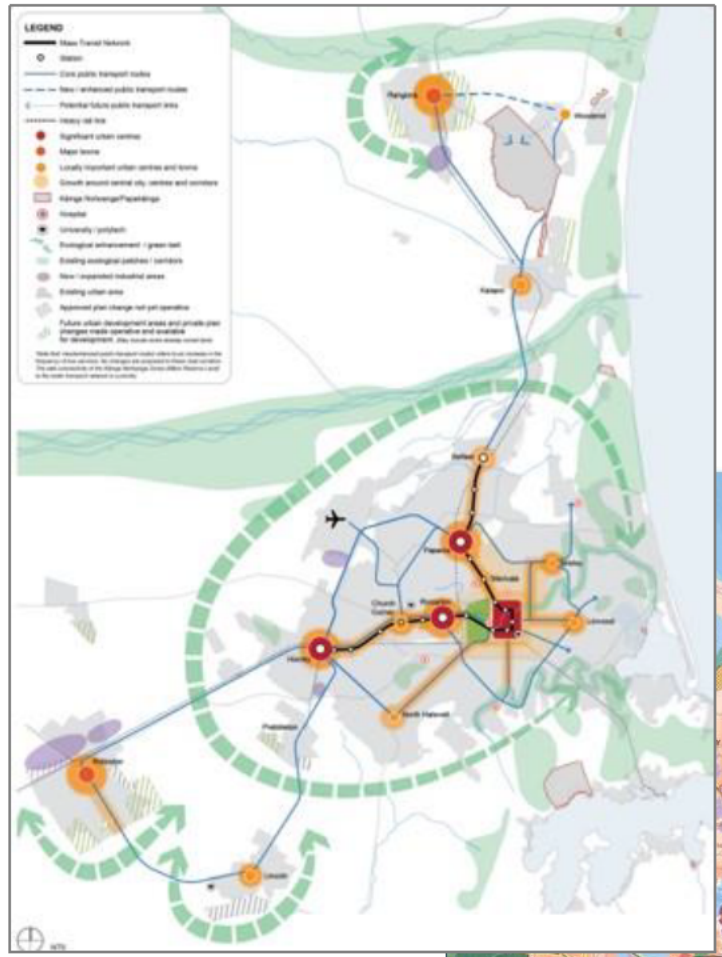
# Key submission point

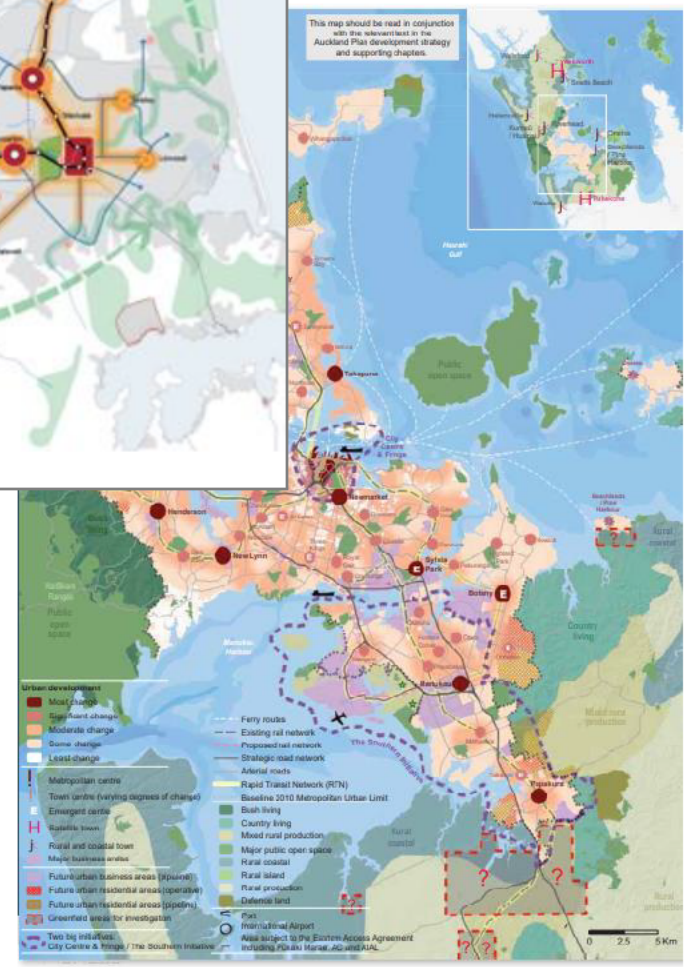
## The need for a map in the FDS which clearly shows a spatial vision for Auckland

- Identifies the parts of Auckland where growth and development will be encouraged, not just where investment will be focused.
- Identifies the strategic transport network, including rapid transit.
- Identifies the key intensification areas in walkable catchments around centres and Rapid Transit Stops identified in draft plan change 78
- To better meet the following requirements of the NPS-UD:

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

  > *Every FDS **must spatially identify**:*
  >
  > *(a) the broad locations in which development capacity will be provided over the long term, in **both existing and future urban areas**, to meet the requirements of clauses 3.2 and 3.3; and*
  >
  > *(b) the **development infrastructure and additional infrastructure required to support or service** that development capacity, along with the general location of the corridors and other sites required to provide it; and*
  >
  > *(c) any constraints on development*





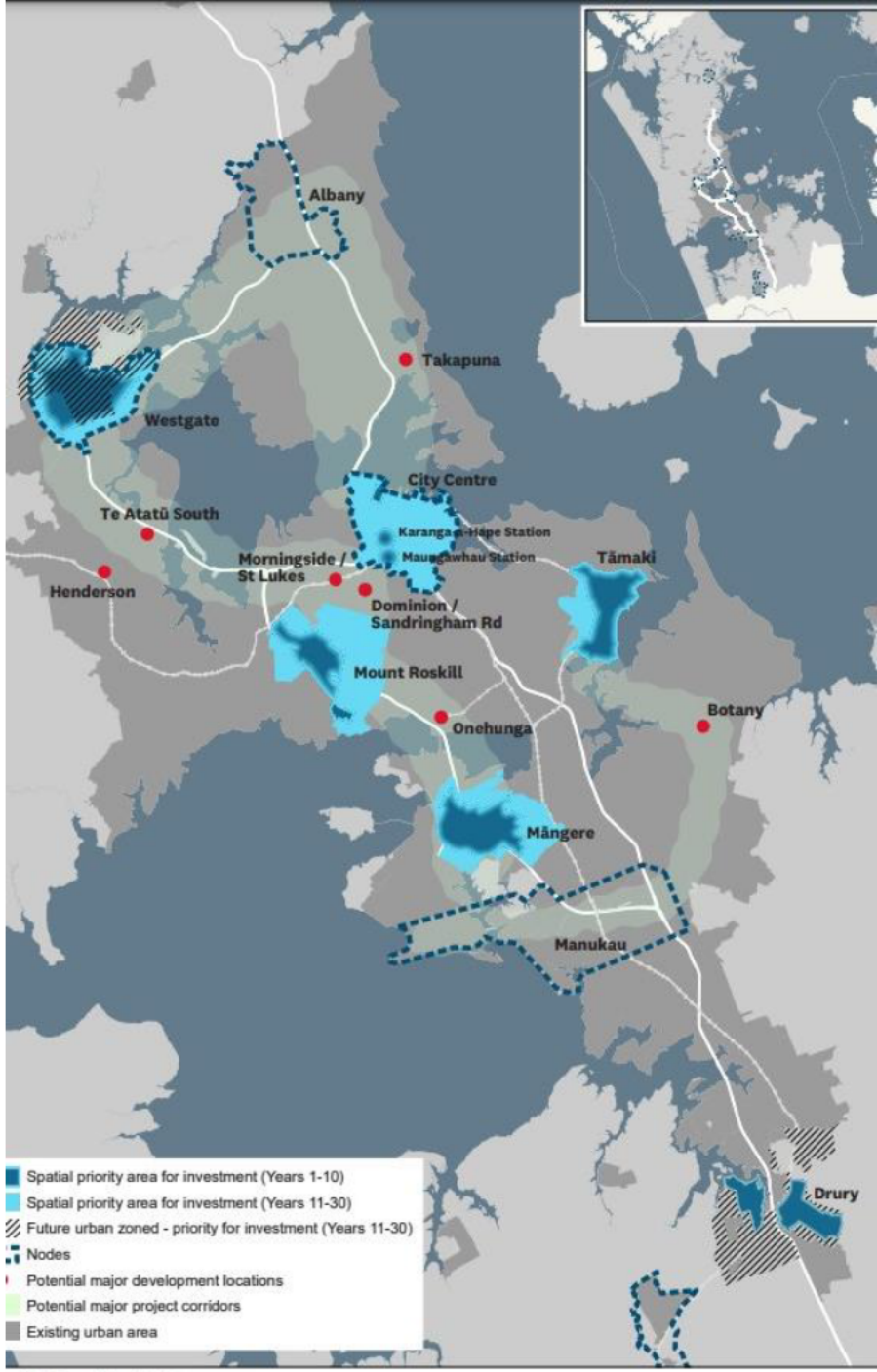
# Key submission point

Waka Kotahi seeks to continue to partner with the Council.

This includes working with the Council team to:

- finalise the FDS with the incorporation of our feedback provided in this submission
- develop and finalise the FDS implementation plan
- develop, along with AT the VKT Reduction Programme

Finalise the FDS with engagement with the Auckland Housing and Urban Growth Joint Programme including agreeing the spatial priority areas for investment




e 18: Spatial priority areas

# Questions

# Links to key documents

- Arataki – 30 Year Plan: https://www.nzta.govt.nz/planning-and-investment/planning/arataki/
- Toitū Te Taiao: https://www.nzta.govt.nz/about-us/about-waka-kotahi-nz-transport-agency/environmental-and-social-responsibility/toitu-te-taiao-our-sustainability-action-plan/
- Tiro Rangi: https://www.nzta.govt.nz/resources/tiro-rangi-our-climate-adaptation-plan-2022-2024/
- Urban Development Position: https://www.nzta.govt.nz/assets/resources/auckland-strategic-spatial-view/urban-development-position-summary-and-key-components-march-2023.pdf
- Auckland Strategic Spatial View: https://www.nzta.govt.nz/assets/resources/auckland-strategic-spatial-view/auckland-strategic-spatial-view.pdf

Level 5, AON Centre
29 Customs Street West
Auckland
New Zealand
T 0800 699 000
www.nzta.govt.nz

31 July 2023

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

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

Name of Submitter: Waka Kotahi NZ Transport Agency

Address for Service: Waka Kotahi NZ Transport Agency
Attention: Nita Chhagan, Principal Planning Advisor
[redacted]

**Overview of submission by Waka Kotahi:**

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

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

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

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

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

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

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

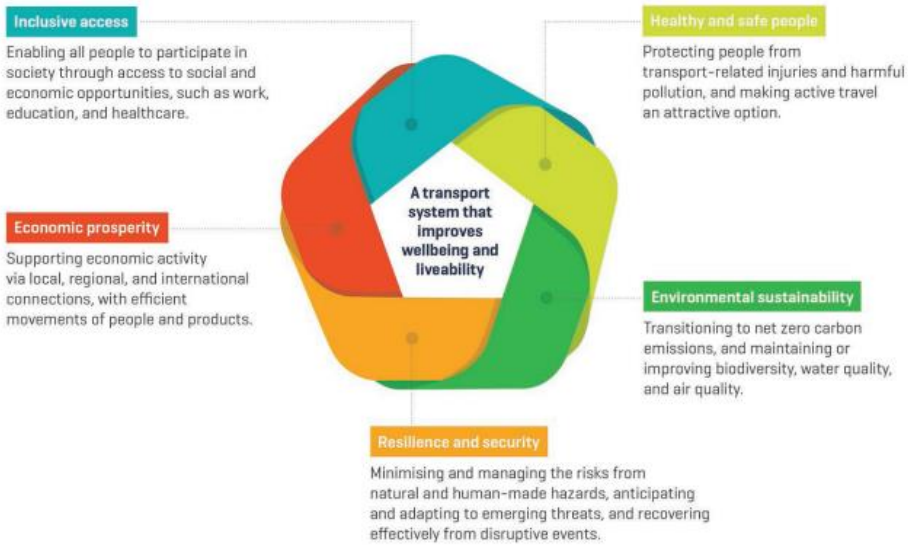
   - Support the Future Urban Land Supply Strategy being incorporated into the FDS and support changes to the future urban areas including the removal of those areas subject to major hazards and delaying a number of other areas, subject to a few points outlined in detail within the submission.

**Waka Kotahi Statutory Functions, Powers and Responsibilities:**

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

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

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




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

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

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

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

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

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

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

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

**Strategic Spatial Framework**

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

---

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

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

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

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

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

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

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

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

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

**Part 3 Inputs to the spatial response**

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

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

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

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

**Part 4 Our Spatial Response**

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

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

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

> *Every FDS must spatially identify:*
> *(a) the broad locations in which development capacity will be provided over the long term, in* ***both existing and future urban areas****, to meet the requirements of clauses 3.2 and 3.3; and*
> *(b) the* ***development infrastructure and additional infrastructure required to support*** *or service that development capacity, along with the general location of the corridors and other sites required to provide it; and*
> *(c) any constraints on development*

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

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

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

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

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

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

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

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

    - Spatial priorities for investment and planning are differentiated.

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

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

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

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

**Future Urban areas**

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

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

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

**Drury**

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

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

**Whenuapai and Redhills**

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

**Areas for removal**

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

**Areas for investigation**

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

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

**Information on Major Projects in Appendix 9**

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

**Inter-regional considerations**

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

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

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

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

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

**Implementation Actions**

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

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

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

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

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

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

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

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

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

Signature of person authorised to sign on behalf of Submitter:



# Future Development Plan 2023 #8634

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

#8634

metlifecare

# FEEDBACK ON THE AUCKLAND COUNCIL'S DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023-2053

31st July 2023

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

**Attention:** **Future Development Strategy**

Freepost Authority 190153
Private Bag 92300, Victoria Street West
Auckland

**Name of submitter:** Metlifecare New Zealand Limited

Metlifecare New Zealand Limited ('**Metlifecare**') provides this detailed feedback on the Auckland Council's draft Auckland Future Development Strategy 2023-2053 ('**FDS**').

## Introduction:

Metlifecare was established in 1984 and is a leading owner and operator of retirement villages in New Zealand. Metlifecare currently owns and operates a portfolio of 36 retirement villages and 23 care centres located predominantly in New Zealand's upper North Island. Metlifecare provides rewarding lifestyles and outstanding care to almost 7,000 New Zealanders.

Metlifecare has a significant presence in Auckland with 20 existing villages, an additional three retirement villages currently under development (at Whenuapai, Pukekohe, and Clevedon), and more than 1,650 new retirement living, and aged care units planned for completion throughout the Auckland region in the next eight years. Its ownership interest in Whenuapai is directly affected by the FDS.

Metlifecare has delivered a wide range of quality retirement villages to the Auckland market including, a variety of housing typologies comprising apartments, duplexes, detached independent living units, and care facilities on both brownfield and greenfield sites. Metlifecare is well-placed to understand the opportunities and challenges of delivering housing in both brownfield and greenfield contexts.

While most of Metlifecare's projects are undertaken in greenfield locations, its development activities are largely on land that is 'live-zoned' and within established urban areas. Metlifecare does not oppose intensification of existing urban land, as proposed in the FDS, but considers that there is a need for both urban intensification and planned expansion on greenfield land if Auckland is to achieve the requirements of the National Policy Statement on Urban Development 2020 ('**NPSUD**'), the objectives of the Regional Policy Statement, and the outcomes sought in the Auckland Plan.

## Executive Summary:

In summary, this feedback makes the following key points:

**Further analysis, consultation, and engagement are required before the FDS is adopted**

1. Metlifecare is a key part of the development sector, and a recognised developer in the Auckland region, but it has not been provided any opportunities to engage or contribute to the FDS. Metlifecare sent a letter to Auckland Council on 30 June 2023 (attached) expressing its concerns with the process followed to prepare and consider feedback on the FDS. Metlifecare considers that the process followed by Auckland Council to prepare and consult on the FDS does not comply with the requirements in the NPSUD or the relevant provisions in the Local Government Act 2002 ('**LGA**').

**Need for consistency and certainty**

2. Within this long-term strategic planning context, there is a need for consistency and certainty to enable efficient public sector investment in infrastructure and private sector delivery of development projects. While a review of the FDS is required (clause 3.16 of the NPSUD) in order to align with three-yearly Long-term Plan cycles, significant change at these times is not considered to be appropriate as it will undermine public confidence in a consistent approach to strategic planning.

3. Melifecare has significant concerns with respect to the Consultation Draft of the FDS. In Auckland's case there is still a significant challenge ahead to provide enough new and affordable homes and land for business in the right places at the right times to keep pace with demand well into the long term. As a general comment, Metlifecare is deeply concerned about the substantial shifting of policy settings. This approach creates significant investment uncertainty. Many developers, including Metlifecare, rely on clear and consistent policy positions when undertaking expensive long-term investment decisions.

**Fairness**

4. There is also an element of natural justice and fairness to consider in relation to the FDS. Developers, investors, and the public generally will have made decisions based on the current FULSS and the broader development strategy contained in the Auckland Plan 2050. Anyone purchasing land in the FUZ will have paid for the land based on a value that is heavily influenced by the clearly signalled development potential. The only discount applied, relative to 'live-zoned' urban land, is that relating to timing. An investment of this nature, where the future development potential is now being removed or substantially delayed, could result in dire financial consequences for the owner. Guiding strategy documents around urban growth should not be altered in any significant way.

**Residential Capacity**

5. The primary assumption underpinning the draft FDS is that there is sufficient development capacity available to meet demand in the existing urban area such that Council does not need to enable expansion. To simply consider 'plan enabled' brownfield residential capacity rather than 'development feasible' capacity, then apply a maximum theoretical build out rate across that

land, is fundamentally flawed. Metlifecare considers that greenfield development within the Future Urban Zone ('**FUZ**') is part of the solution to managing Auckland's growth. It is accepted that intensification (infill) of the existing urban area is also an important means of accommodating growth. However, the two approaches can and should co-exist, in order to provide housing choice, efficient provision of infrastructure, homes close to existing sub-regional centres and towns, workplaces adjacent to existing transport infrastructure and residential growth areas, and resilience in the face of climate change. Metlifecare is of the view that the coexistence of both greenfield and infill housing will provide the best opportunity for supporting a competitive land and development market.

**FDS Site Constraints and Flooding Matters**

6. The FDS cites that there are a number of statutory and non-statutory documents that support the concerns raised in the FDS as reasons why growth in the FUZ should be slowed and further assessments completed. Metlifecare disagrees with the approach. The existing planning documents already provide a pathway and a consenting framework to address such matters. In Metlifecare's experience when developing larger greenfield sites, there is ample opportunity (and land) to masterplan developments to manage natural hazards and stormwater issues and, as noted above, there are already sufficient controls within the Auckland Unitary Plan ('**AUP**') to manage such effects.

**Infrastructure funding Investment**

7. The FDS assumes that only the Council will fund core infrastructure. This is not correct, and on many projects the developer funds and delivers the infrastructure. The infrastructure triggers in the FDS are unclear and appear to assume that all infrastructure needs to be delivered before rezoning occurs.

8. Metlifecare considers that where infrastructure investment has occurred, those areas should be prioritised so that a return can be obtained from the funding that has already been invested. For example, Council and its CCOs have invested $181m for the Northern Interceptor bulk wastewater line and North Harbour 2 watermain, both of which are required to service the Whenuapai area. In addition, the Council has purchased land for parks and open space in Whenuapai at a cost of $34m (161 Brigham Creek Road, 4 Spedding Road, and 92 and 94A Trig Road). Another example is Drury South.

**Infrastructure Triggers**

9. Triggers for live-zoning land are unclear and lack evidence to support their need. For example, the triggers listed in 2035+ and 2050+ do not practically relate to some areas. Preventing development until triggers are completed or progressed is unworkable as there is no certainty that these projects will be funded in the future. Metlifecare notes that Whenuapai North Stage 1 and Stage 2 contain the same development triggers.

**Developer Contributions**

10. Infrastructure is partially funded by developers, in accordance with an approved Developer Contribution Policy or other approved funding framework. There is virtually no mention of development contributions as a means of resolving funding shortfalls often cited in the FDS,

notwithstanding that large-scale development proposals almost always (via the Plan Change process) incorporate transport and infrastructure upgrade triggers as part of any successful rezoning.

**Mapping Deficiencies**

11. FUZ areas recommended for "further investigation" or "TBC" on the FDS maps (refer FDS Figure 13) are vague and uncertain. There can be no reliance on the retention of the FUZ on that land over the longer term. Identifying land in that manner in the FDS is not an appropriate approach for a strategy that is intended to provide development and investment certainty.

**Whenuapai: Case Study**

12. Northwest Auckland, in particular Whenuapai, is an exceptional case for which the sequencing and 'development-ready' timeframe should not be altered from the status quo. With regard to Whenuapai, the FDS does not accurately recognise the existing FUZ land that has been live zoned or the significant investment in infrastructure. The FDS creates an unfinished community. The effect of significantly delayed urbanisation on this land that has been signalled for such growth is lack of investment, removal of any significant productive potential, and creep of unauthorised urban activities. The amenity of the Whenuapai area is greatly reduced, and that is a poor outcome if sustained for any ongoing significant period. Growth in Whenupai is supported by the Upper Harbour Local Board.

    Our comments are provided in relation to the following key points:

## National Policy Statement on Urban Development 2020

13. Metlifecare notes that the purpose of the FDS, as required by NPSUD, is to set the high-level vision for accommodating urban growth over the long term and to identify strategic priorities to inform other development related decisions, such as the provision of infrastructure. The FDS seeks to promote long-term strategic planning by setting out the means by which a local authority intends to achieve a well-functioning urban environment, provide sufficient development capacity over the next 30 years, and integrate planning decisions with infrastructure planning and funding. This is intended to assist in delivering well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future as required by Objective 1 of the NPSUD.

14. Metlifecare also notes that Objective 2 of the NPSUD seeks to ensure that planning decisions improve housing affordability by supporting competitive land and development markets. From Metlifecare's perspective, it is important that sufficient opportunities are provided for a wide range of housing types and locations. This should include both brownfield and greenfield land. In Metlifecare's view, this will provide the best opportunity to ensure suitable housing supply, the provision of housing choice and a competitive land market.

15. Objective 4 of the NPSUD supports greater supply of housing, whilst ensuring that planning is responsive to changes in demand and that the form and location of development meet the

diverse needs of communities. The proposed FDS does not provide choice or meet the diverse needs of the community, particularly the ever-increasing elderly demographic. Given the nature of Metlifecare's business, it has particular location, size and topography requirements to ensure its retirement village developments can meet the particular needs of its residents. Finding a large-scale, flat residential site, on land that is not fragmented, in the urban area of Auckland, which meets the specific requirements of Metlifecare and is feasible to develop, will become an impossible task if all greenfield options are removed.

16. Metlifecare supports the NPSUD and intent of the FDS approach generally. It is important that Local and Unitary Authorities operate with a long-term planning horizon to ensure that sufficient suitably live zoned land is made available to meet the short, medium, and long-term needs of the community.

17. Metlifecare opposes the FDS being embedded into the Regional Policy Statement to restrict plan changes in the FUZ. This will remove opportunities for advancing the urbanisation of land, where that can address housing needs and where issues such as the provision of infrastructure have been resolved.

## Further analysis, consultation and engagement is required before the FDS is adopted

18. Metlifecare is a key part of the development sector, and a recognised developer in the Auckland region, but it has not been provided any opportunities to engage or contribute to the FDS. Metlifecare sent a letter to Auckland Council on 30 June 2023 (**attached**) expressing its concerns with the process followed to prepare and consider submissions on the FDS.

19. Metlifecare notes that under clause 3.15 of the NPS-UD, the Council is required to engage with a range of parties to prepare a draft FDS, including other relevant councils, central government, hapū, and iwi, infrastructure providers, and the development sector. The broader requirements in Policy 10 requires the Council to *"engage with the development sector to identify significant opportunities for urban development*". Engagement with the development sector is also required to identify infrastructure requirements.

20. Metlifecare considers that the Council has not complied with its requirements under clause 3.15 of the NPSUD and Policy 10. Based on the information provided by the Council the following consultation was undertaken prior to notification of the draft FDS:
    (a) a survey was sent to property developers on the Council's database to understand developer trends and future intentions;[1] and
    (b) the Council engaged with The Property Council.

21. Despite Metlifecare's prominence in the development sector, it was not sent a survey or provided an opportunity to engage or contribute to the FDS. Metlifecare is unable to identify any property

[1] We understand that the survey was sent to people who had recently lodged a building consent with the Council.

developers who were surveyed by the Council. It does not appear that the Council surveyed a large proportion of developers in Auckland.

22. Metlifecare considers that the FDS should be withdrawn and reconsidered following meaningful consultation with the development sector. It should also be delayed pending the central government elections, the review and approval of Plan Change 78 and the completion of the business land capacity study.

23. In preparing an FDS in accordance with clause 3.15 of the NPSUD, local authorities must use the special consultative procedure in section 83 of the LGA. Section 83(1)(d) of the LGA provides that the Council must "*provide an opportunity for persons to present their views to the local authority in a manner that enables spoken interaction between the person and the local authority ...".*

24. Based on the information available on the Council's website, the Council is proposing to make changes to the FDS in response to written feedback and adopt the FDS in late 2023 without holding a public hearing. This approach is entirely inconsistent with the LGA. While the Council belatedly provided a single day for feedback, this invitation was not sent to Metlifecare (or a number of large developers) and the limited dates that were provided were already fully booked.

25. The special consultative process is generally applied to matters that have high significance to the community and may have major implications. As set out above, the FDS will have a material impact on growth and development in the Auckland region. Developers, and the public generally, deserve to have their concerns heard and understood. This right under the LGA has been recognised in other regions across New Zealand including in Nelson (where hearings were held in April 2022 on its FDS) and Rotorua (where a hearing is scheduled for August 2023).

26. Metlifecare requests the Council schedule a hearing on the FDS in accordance with the LGA to enable all persons who provided feedback with the opportunity to be heard (as required by section 83(1)(d) and (e) of the LGA).

27. Metlifecare notes that limited changes can be made through the Special Consultative Process without triggering the need to re-consult. Effective pre-engagement is therefore needed. Metlifecare considers that independent hearings are required to consider the evidence.

## The need for certainty and consistency

The purpose of a future development strategy is to promote long-term strategic planning by setting out the means by which a local authority intends to achieve a well-functioning urban environment, provide sufficient development capacity over the next 30 years, and integrate planning decisions with infrastructure planning and funding. [2]

Within this long-term strategic planning context, there is a need for consistency and certainty to enable efficient public sector investment in infrastructure and private sector delivery of development

[2] NPSUD, clause 3.13

projects. While review of the FDS is required[3] in order to align with three-yearly Long-term Plan cycles, significant change at these times is not appropriate as it will undermine public confidence in a consistent approach to strategic planning.

It needs to be recognised that most of the development of Auckland is undertaken by private developers. Property development is not a quick turnover business. Projects often take multiple years to come to fruition, and developers rely on the consistency and certainty of long-term planning to make investment decisions. Metlifecare has relied heavily on the AUP and the Future Urban Land Supply Strategy ('**FULSS**') to guide its investment decisions since 2015, and it now sees the prospect of much of that investment being unnecessarily frozen or undermined due to the proposals in the FDS.

The significant changes that the FDS now proposes to growth planning in Auckland will weaken developer confidence in the region as a place to invest. As development primarily occurs as a result of private sector investment, a reduced level of developer confidence in Auckland will inevitably have consequential impacts on the regional economy and on housing affordability.

## Fairness

There is an element of fairness to consider in relation to the draft FDS. Developers, investors, and the public generally will have made decisions based on the current FULSS and the broader development strategy contained in the Auckland Plan 2050.

Anyone purchasing land in the FUZ will have paid for it based on a value that is heavily influenced by the clearly signalled development potential. The only discount applied, relative to 'live-zoned' urban land, is that relating to timing. An investment of this nature, where the future development potential is now being removed or substantially delayed, could result in dire financial consequences for the owner. Guiding strategy documents relating to urban growth should not be altered in any significant way, particularly with regard to removal of development potential or delaying the timing of land release. If it is agreed that a change in course is desirable, that should be a long-term realignment that is applied to new development areas that might be considered beyond the current 30 year timeframe under the FULSS and the Auckland Plan.

## Residential Capacity

28. Metlifecare considers that the draft FDS significantly overstates the ability of the existing urban environment to meet the housing needs of the Auckland community. The FDS is essentially relying on all of Auckland's future housing stock deliverability to be provided through infill development. While such housing is indeed part of the overall solution, these areas comprise a much higher percentage of small-scale developers, land-bankers or 'mum and dad' investors. The FDS significantly constrains available land supply and does not provide choice or options for the diverse needs of the community, particularly the elderly demographic who require higher levels of personal and medical care and the support that retirement village living provides.

[3] Ibid, clause 3.16

29. The FDS analysis appears to be based on plan-enabled capacity. Metlifecare considers that there is a need to consider "*feasible and reasonably expected to be realised*" capacity by location and type, as identified in the NPSUD.

30. There are many reasons why existing urban land may not be suitable for redevelopment. This includes the circumstances of the land owners, the existing capital investment on the land that makes redevelopment cost prohibitive, and the lack of suitable infrastructure capacity. This has certainly been Metlifecare's experience when developing such land.

31. The proportion of New Zealand's 70 and over population is anticipated to grow substantially over the next 25 years as our population ageing continues to accelerate. The estimated population of people over 70 years old in New Zealand is projected to grow 125%, from approximately 500,000 in 2023, to over 1.1 million by 2048. The 80 years and over population will experience even more growth with 157% population growth between 2023 and 2048. By 2048, the 70 years and over age group is projected to be 18% of New Zealand's population. Due to the overwhelming population growth of this age group, primarily due to the "baby boomer" generation, there will be further need for housing and age-specific services such as dementia and palliative care.[4]

32. Through the statistics provided above, it is apparent that there is growing demand for comprehensive aged care retirement villages and the region lacks supply for these types of villages, and aged care living more generally. Comprehensive aged care retirement villages provide for a range of retirement living and care options, including independent units such as villas, duplexes and apartments. It also provides the full range of aged care, including services for assisted living, rest-home, hospital-level care, specialist dementia level care and respite care.

33. Metlifecare is a leader in the development and management of vibrant social retirement communities which provide independent living and aged care options. Metlifecare develops its retirement village product which is based on 'urban village' design where residents are accommodated in a number of buildings grouped around a "street network". This approach more closely aligns with urban design best practice and better meets the Auckland Council's design strategy and provides a balanced approach to retirement villages. The fundamental requirement of an 'urban village' is effectively a large, flat site. This impacts the degree of earthworks and land contour. Because of mobility issues for the elderly, there is a high use of mobility scooters and walking frames. Residents need level well-designed paths. The finished contour of the 'streets' are fundamental. The FDS removes greenfield options which will significantly impact Metlifecare's ability to find suitable sites that meet the needs of the elderly community.

34. Noting the current recession and uncertainty in the housing market, a slowdown in the availability of greenfield land for housing development will result in a significant reduction in general housing stock availability. Whilst the length of recession is unknown, the current FDS will likely contribute to significantly lower housing availability and further delays in housing deliverability, and increased house prices over the short term.

[4] Statistics New Zealand _ Population projections based on 2018 census data.

35. Despite the assertion that the MDRS will significantly increase infill housing supply, Metlifecare notes that since 2016 most of the urban areas in Auckland have been able to develop up to 3 dwellings as a permitted activity. Despite this opportunity, the share of Auckland's dwelling growth that has been delivered by these smaller permitted activities is considerably less efficient than larger multi-unit developments and greenfield neighbourhoods. Metlifecare has significant doubts that the MDRS will deliver a larger percentage of growth than the present situation.

36. The draft FDS will result in a significant reduction in available housing capacity, with no economic assessment of the overall flow on effects from removing or delaying such large areas of FUZ land. Metlifecare notes that infill and redevelopment housing is generally 20-30% more expensive to build than greenfield housing. The reduction in land supply will place ongoing upward price pressures on houses, as experienced in Auckland since the introduction of the AUP in 2016.

37. The FDS targets urban growth only at Red Hills, Tāmaki, Mangere, and Mt Roskill. These are very largely identified as the Kāinga Ora redevelopment areas. These locations are too confined and will not provide for the necessary breadth of growth; and too limited in the geographic spread in terms of where people desire to live, and the breadth of lifestyle choice that people seek.

38. Metlifecare notes that the Auckland Council has obtained a further 12-month extension for implementation of the MDRS under Plan Change 78. We understand that the primary reason is the uncertainty of the ability to intensify some existing urban areas due to the recent flooding events. There is significant uncertainty as to the extent that these recent weather events will reduce the development capacity in the existing urban areas. Metlifecare considers that it is premature to undertake changes to the FUZ (including staging) until Plan Change 78 has been approved.

39. Metlifecare also notes that the FDS proposes to remove areas of FUZ, but there is no indication that the Council has considered areas outside the FUZ to address this reduction of land.

## Business Land Supply

40. Metlifecare acknowledges that the FDS not just about delivering homes and housing, but it is also about well-located opportunities for business activity and community facilities, to offer good accessibility to employment and a range of household needs in the urban setting.

41. Metlifecare considers that meaningful intensification of the existing urban area is an unrealistic option for industrial development, particularly for land-extensive floorplates. Provision for most of this growth will need to be in greenfield locations.

42. Metlifecare also notes that the Business assessment is not complete. This is a fundamental part of the evidence base that needs to be completed to inform the FDS. Without an adequate supply of employment land, Auckland risks reducing its competitiveness and business will relocate outside of Auckland.

43. The FDS should be delayed until this work has been completed.

## FDS Identified Site Constraints and Flooding Matters

44. The FDS states that there are several statutory and non-statutory documents that support the concerns raised in the FDS as reasons why growth in the FUZ should be slowed and further assessments completed. The includes documents like The *National Policy Statement for Freshwater Management 2020* which deals with sensitive hydrological spaces, inclusive of wetlands and streams. Sediment and erosion are controlled by consent conditions and Council's own GD-05 standards. The recent flood events have been identified as one of the reasons to prevent greenfield development due to several stated constraints.

45. Metlifecare disagrees with the approach. The existing planning documents already provide a pathway and a consenting framework to address such matters. In any event, the potential for enhanced regulatory methods (i.e. even better stormwater performance requirements) should have been considered as options. It is also noted that the requirement for structure planning and an eventual Plan Change provides more than sufficient controls to ensure that site constraints (including natural hazards) are identified and suitably addressed.

46. In Metlifecare's experience, when developing larger greenfield sites, there is ample opportunity (and land) to masterplan developments to manage natural hazards and stormwater issues and, as noted above, there are already sufficient controls within the AUP to manage such effects. Metlifecare is not aware of any recently rezoned greenfield areas that failed or suffered undue flooding damage as a result of the recent stormwater effects. On the contrary, it was largely areas of infill housing that experienced the most significant adverse flooding damage.

47. Metlifecare also notes that it is likely that additional qualifying matters, such as flooding, would prevent or delay development under the MDRS until this aspect of development was resolved. The current uncertainty around the final outcomes of Plan Change 78 and the MDRS (including the 'theoretical yield') further highlights the lack of certainty on the ability for the policy framework to provide suitable housing choice to the Auckland community.

48. Metlifecare has been involved in a significant number of both greenfield and brownfields developments and it is of the view that development done well, designed in an integrated manner from the outset with good modern infrastructure standards, is far superior to ad-hoc and fragmented infill in older, often car-orientated neighbourhoods with very poor infrastructure.

## Governmental Uncertainty

49. Metlifecare notes that the National party has signalled that it will likely make the MDRS "optional". There is current significant uncertainty as to whether they will continue to support and deliver the capacity envisaged under the MDRS. Should the approach to the MDRS change, Council will be left with a FDS that serves a limited purpose and provides for a watered-down

infill approach relying on infill uptake much like we already have under the AUP, but with a diminished ability to bring in greenfield land.

## Infrastructure Services and Funding

50. The FDS assumes that only the Council will fund core infrastructure. This is not correct, and on many projects the developer funds and delivers the infrastructure. The infrastructure triggers in the FDS are unclear and appear to assume that all infrastructure needs to be delivered before rezoning occurs. This is also unrealistic as the private sector will not invest in the absence of certainty about land use outcomes, as it is the approval of land use that enables developers to secure funding for the infrastructure. The Council is very unlikely to be in a position to fund the required infrastructure and it needs to work in partnership with the private sector to deliver the infrastructure and land use outcomes required.

51. Metlifecare considers that providing infrastructure in the FUZ integrates suitably sized infrastructure from the beginning. Because it is a 'clean slate', there is an opportunity to design and size infrastructure within the context, use the land efficiently, and maximise development and the investment that the Council makes. For existing communities on the urban/FUZ interface, greenfield development may enable additional critical mass and additional economic support for their local neighbourhoods.

52. Metlifecare notes that in terms of greenfield areas, on-site iinfrastructure is generally funded by developers. Offsite infrastructure to meet the demands of growth is largely funded in accordance with an approved Development Contribution Policy or other formalised funding framework.

53. Metlifecare considers that the FDS significantly underestimates the costs and feasibility for retrofitting infrastructure into existing brownfield areas. There are also significant issues with the ability for developers to obtain a 'right of entry' to access infrastructure on private land. Metlifecare has walked away from many opportunities on the basis that there is no clear or certain pathway to be able to connect a development into the existing infrastructure network. This issue already frustrates intensification under the current AUP provisions and it will not be addressed by PC78.

54. There is very little mention of development contributions as a means to resolve funding shortfalls often cited in the FDS, notwithstanding large-scale development proposals almost always (via the Plan Change process) incorporating transport and infrastructure upgrade triggers as part of any successful rezoning. We can only presume that the Council has no appetite to contribute any funding to future FUZ developments in the short to medium term, hence why this option has been almost entirely discounted from the FDS. Developers have (for some time) successfully shared the cost of greenfield redevelopment in previously identified FUZ areas – through both standard development contributions required under conditions of consent, and/or by infrastructure funding agreements with services providers.

55. Metlifecare considers that where infrastructure investment has occurred, those areas should be prioritised so that a return can be obtained from the funding that has already been invested. For example, Council and its CCOs have invested $181m for the Northern Interceptor bulk wastewater line and North Harbour 2 watermain, both of which are required to service the Whenuapai area. Another example is Drury South.

## Infrastructure Triggers

56. Triggers for live-zoning land are unclear and lack evidence to support their need. For example, the triggers listed in 2035+ and 2050+ do not practically relate to some areas. A significant number of the development triggers are yet to be subject to approved funding structures/ business case studies, or worse, are unlikely to be practically constructed or delivered in a timely manner moving forward. Limiting development of greenfield land until unfunded/ unsupported projects and associated development triggers are completed or progressed is unworkable as there is zero certainty that these projects will be funded in the future. Metlifecare notes that Whenuapai North Stage 1 and Stage 2 contain the same development triggers:

| | |
|---|---|
| Whenuapai North (stage 1) | SH16 to SH18 Connections<br>Brigham Creek Road upgrade<br>SH16-18 Upgrades<br>North-west Rapid Transit<br>Upper Harbour (SH18) Rapid Transit<br>Trig Road Water Reservoir, North Harbour No.2 Watermain Project<br>Brigham Creek Pump Station Whenuapai Redhill Package 1<br>Northern Redhills to Brigham Creek Wastewater Project<br>Whenuapai and Redhills Wastewater Scheme |
| Whenuapai North (stage 2) | North-west Rapid Transit<br>SH16 to SH18 Connections<br>SH16-18 Upgrades<br>Upper Harbour (SH18) Rapid Transit<br>Trig Road Water Reservoir, North Harbour No.2 Watermain Project<br>Brigham Creek Pump Station Whenuapai Redhill Package 1<br>Whenuapai and Redhills Wastewater Scheme<br>Northern Redhills to Brigham Creek Wastewater Project |

57. All Whenupai North Stage 2 development triggers need to be completed prior to the rezoning of Whenupai North Stage 1. There is no rational infrastructure reason to therefore defer stage 2 to 2050+.

58. This highlights another shortcoming in the FDS, which is that all greenfield development has effectively been quarantined until all infrastructure has been built, whereas a great deal of greenfield development can take place on an incremental basis.

## Mapping deficiencies

59. FUZ areas recommended for "*further investigation*" or "*TBC*" on the FDS maps[5] are vague and uncertain. There can be no reliance on the retention of the FUZ on that land over the longer

[5] FDS, Figure 13 – Future urban areas

term. Identifying land in that manner in the FDS is not an appropriate approach for a strategy that is intended to provide development and investment certainty. The status and future development potential of every parcel of land in the region should be able to be clearly ascertained from the FDS, and that is not the case.

60. The maps contained within the FDS are too coarse to be useful and cannot be relied upon as a means of identifying the future status of individual parcels of land. The boundaries between different development areas on the maps do not follow property boundaries or roads in many cases, so it is not possible to determine whether or when a site at the interface will be available for urbanisation (refer Figure 1). The draft FDS contains insufficient information to fulfil its purpose in this respect.

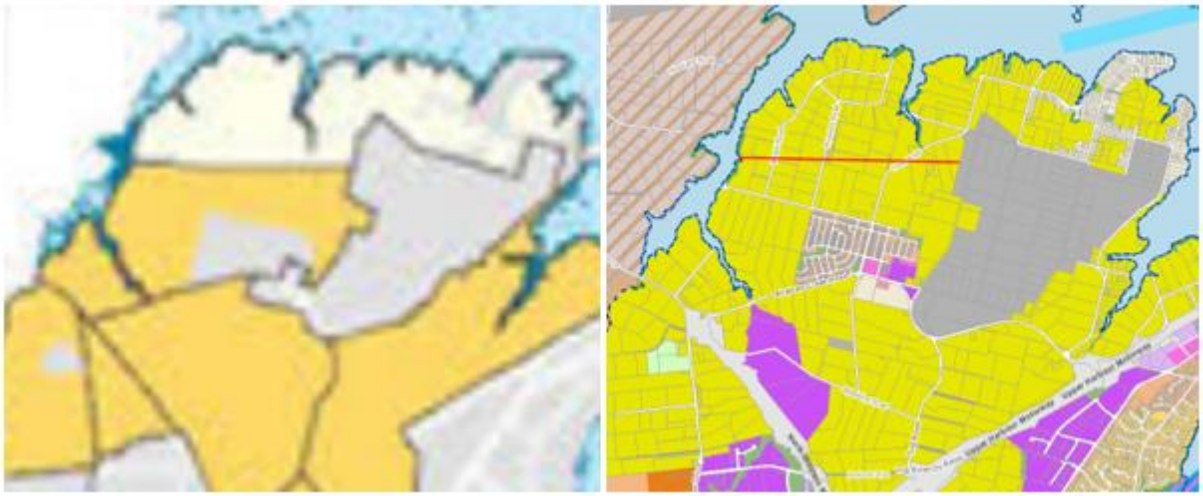


***Figure 1:*** *boundary between 2035+ and 2050+ areas in Whenuapai (shown as red line in AUP maps on right)*

## Case Study: Whenupai

61. Northwest Auckland is an exceptional case for which the sequencing and 'development-ready' timeframe should not be altered from the status quo.

62. The northwest has been identified for future urban growth since the late-1990s/early2000s and a number of strategic documents from the last two decades have helped inform the Council's current plans and strategies for urban growth in the northwest. In Whenuapai a number of established, reputable developers, investors and the public generally have relied most recently on the:

- **Whenuapai Structure Plan 2016** (which identifies Stages 1(a) to 1(f) Whenuapai as being development ready within 2 – 10 years and Stage 2 after 2027). The Whenupai Structure Plan was completed and endorsed by Auckland Council after a full public consultation process under the Local Government Act 2002. The Structure Plan sets out the framework for transforming Whenuapai from a semi-rural environment to an urbanised community

over the next 10 to 20 years. The plan guides future development by defining land use patterns and the location, timing and provision of infrastructure.

- **Future Urban Land Supply Strategy 2017** –identifies different areas within Whenupai as being development ready 2018 – 2022 and 2028 – 2032. As to "sequence", the PC5 land remains top priority for release.
- **Plan Change 5** (PC5) 2018 – 2022. Withdrawn 16 June 2022. As to "sequence", the PC5 land remains top priority for release within the current Future Urban Land Supply Strategy.
- **Significant Council Investment in infrastructure in Whenuapai** including:
    - Northern Interceptor $181m
    - North Harbour 2 Watermain
    - Council Parks Acquisitions $30m +
    - Trig Road South Arterial Consent application underway (2023)
- **Te Tupu Ngātahi Supporting Growth** has lodged several Notices of Requirement for transport corridor upgrades through the Whenuapai area. These are to be heard in September this year.
- **Significant existing urban area is located in the heart of Whenuapai Village, including a Special Housing Area (SHA)** which is surrounded by FUZ. Two additional SHAs are located less than five kilometres from Whenuapai.
- **Private Plan Change 69** was approved by Auckland Council which rezones 52 hectares of land at 23-27 & 31 Brigham Creek Road and 13 & 15-19 Spedding Road, Whenuapai from FUZ to Light Industry Zone, and to introduce a new precinct within the AUP. Large-scale public infrastructure upgrades are being undertaken as part of this plan change.
- **Private Plan Change 86** located immediately south-west of the existing Whenuapai Village. PC86 is currently in progress and Council has recommended approval. PC 86 proposes to rezone 5.2ha of land at 41-43 Brigham Creek Road from Future Urban to Residential Mixed Housing Urban (MHU).

In addition, multiple bulk earthworks consents have been granted in Whenuapai by Auckland Council specifically for the purpose of establishing appropriate ground conditions for future urbanisation and development, as anticipated by the FUZ.

- 20 August 2020, LUC60350837 – 151 – 157 Brigham Creek Road, Whenuapai. Bulk earthworks consent includes (cut to fill) over an area of 11.69ha comprising a total of 96,400m3 (cut of 48,200m$^3$, fill of 48,200m$^3$).
- 29 November 2021, LUC60376543 –71 Trig Road, bulk earthworks comprising 51,500m$^3$ of land disturbance over an area of 6.7ha. NESCS consent was also granted for the disturbance, removal and disposal of contaminated soil containing petroleum hydrocarbons.
- 29 May 2023, LUC60410317 and WAT60410318, bulk earthworks and a water permit for dewatering at 73 Trig Road under the AUP.
- 7 June 2019, LUC60332020, 2-10 Kauri Road, 12-18 Kauri Road, and 150-153 Brigham Creek Road, Whenuapai. Bulk earthworks to prepare the site for urbanisation, with volumes of 55,580m$^3$ and 59,260m$^3$ for cut and fill respectively.

**Figure 2** provides an image of the large-scale earthworks undertaken at a Brigham Creek Road site in Whenuapai.



***Figure 2:*** *Bulk earthworks, Brigham Creek Road, Whenupai*

The following developers have invested in Whenupai:

- Metlifecare
- The Neil Group
- Cabra
- Austino
- CDL Land
- Oyster Capital
- Any many more

63. Metlifecare is the registered legal owner of 99 Totara Road, Whenuapai, Auckland which comprises 8.9574ha. The site is located within the Whenuapai Structure Plan area and is anticipated to be developed for low-density residential activities by the Whenuapai Structure Plan. The Auckland Council's Future Urban Land Supply Strategy 2017 identifies that this land will be released for urban development in the period from 2028-2032. The Draft FDS proposes new timing of 2050+.

64. The site at 99 Totara Road was acquired by Metlifecare based on its site characteristics, proximity to the Whenuapai village and Whenupai Centre (including an SHA), and undersupply of retirement village options in north-west Auckland. When undertaking this significant investment decision, Metlifecare relied on the timing within the adopted Whenupai Structure Plan 2016, FULSS timing, the significant Auckland Council investment in infrastructure (including the Northern Interceptor) and other matters listed above.

65. Metlifecare is in the process of master planning and preparing resource consent documentation for a new retirement village at this site. The project will create positive effects on the social and cultural wellbeing of current and future generations through job generation and increased supply of highly sought after retirement home and care living options. The project will generate significant economic activity and greatly contribute to the delivery of housing in a market where demand is outweighing supply. The new retirement village provides housing choice and variety for the elderly demographic and creates future housing options for local residents who currently do not have access to this type of housing in Whenuapai, with Hobsonville providing the closest retirement home and care facilities. The proposal also incorporates infrastructure upgrades, including three waters, roading and social infrastructure (the proposed park and coastal walkway) upgrades. The Draft FDS has a significant impact on this project and the surrounding area.

66. In terms of Whenupai the Draft FDS does not accurately recognise the existing FUZ land that has been live zoned or the significant investment in infrastructure. The proposed FDS creates an unfinished community, without the ability to provide suitable employment or housing land which would lead to worse sustainability outcomes. The rationale appears to be based on the financial constraints of the Council and its own assumptions regarding what infrastructure is required for development, rather than any defendable land use strategy.

67. Given the overwhelming time and resource expended to agree on the current FULSS, any proposal to depart from that, like the Draft FDS, must be supported by comprehensive research and analysis that:
    (i) Clearly establishes the case for change, and
    (ii) Proves that the Draft FDS is a superior way forward.

68. The FDS effectively halts further investment and development in Whenuapai until 2035+ and 2050+. Metlifecare consider that where infrastructure investment has occurred, those areas should be prioritised so that a return can be obtained from the funding that has already been invested.

69. By effectively quarantining greenfield development in Whenuapai the FDS will defer any payback for Council for the infrastructure projects for at least another 12 years or more, which will be at least 18 years after the 2016 Whenuapai Structure Plan was adopted.

70. The effect of significantly delayed urbanisation on this land that has been signaled for such growth is lack of investment, removal of any significant productive potential, and creep of unauthorised urban activities. The amenity of the Whenuapai area is greatly reduced, and that is a poor outcome if sustained for any ongoing significant period.

71. Implementation of the current FULSS in Whenuapai is clearly not being fully realised, but what is being delivered is largely because of the initiative and investment by the private sector. Since the FULSS, there has only been one Council led Public Plan Change (PC5), but that was withdrawn. PC5 comprised 'in-depth' analysis to a point where there was no suggestion that any significant amendments and refinements were required to the Whenuapai Structure Plan. PC5 was proceeding through the statutory process for nearly five years before it was withdrawn, and that

process included a s32 evaluation. submissions and further submissions, a s42A planning report, and a hearing before independent commissioners. Left to Council, areas identified as suitable for growth like Whenupai will not be realised any time soon. It is important that private and public sectors worth together and achieve the combination of urban consolidation, greenfield development, and the expansion of satellite townships needed.

72. The only way to solve housing and infrastructure shortfalls is through partnership with the private sector. A more agile, rather than restrictive strategy is called for.

**Growth in Whenuapai is supported by the Upper Harbour Local Board**

73. On 25 May 2023 the Upper Harbour Local Board (UHLB) requested in regard to Whenuapai that:

    *1) as a matter of urgency, Auckland Council prioritise and fund the development of a detailed plan change for the parts of Whenuapai currently zoned Future Urban;*
    *2) Restates resolution number UH/2021/147 from the 18 November 2021 business meetings which provides feedback on the development contributions policies; and*
    *3) Consider it vital the Development Contributions Policy in Place for Drury is expanded to include Whenupai as soon as possible given how quickly development is occurring. Auckland Council needs to ensure that developers pay for infrastructure that will be required over the longer-term planning horizon (letter **attached**).*

74. The board has requested the opportunity to speak to the Planning and Environment Committee on this matter. This motion was carried unanimously.

75. The UHLB includes Whenuapai, Herald Island, Hobsonville and West Harbour in the west, and Paremoremo, Greenhithe, Albany, Rosedale, Northcross, Unsworth and Pinehill in the east. The UHLB provides governance at the local level within Auckland Council. They enable democratic decision-making by, and on behalf of communities within the local board area. Local boards are charged with decision-making on local issues, activities and services and provide input into regional strategies, policies, plans and decisions.

76. Metlifecare shares the concerns of the UHLB and support the motion to:
    a) Request that Auckland Council urgently prioritise and fund the development of a detailed plan change for the parts of Whenuapai currently zoned Future Urban
    b) Expand the development contributions policy for Drury, to Whenuapai.

77. The sequencing and urban planning ideology of the Draft FDS is not based on real evidence, facts or the desires of the local communities and in this case, the local board representing the area.

78. Whenuapai is an exceptional prospect for urbanization and should be prioritised for the reasons outlined above.

## Conclusion

79. A quality FDS will support economic competitiveness over the next 30 years. To prepare the draft FDS, the NPSUD requires engagement with the development sector (to identify significant future development opportunities and infrastructure requirements) (clause 3.15).

80. This is needed because developers ultimately implement the FDS – providing for growth in the wrong locations means supply will fall short of demand with flow-on effects for housing affordability and business productivity.

81. The FDS seeks to promote long-term strategic planning by setting out the means by which a local authority intends to achieve a well-functioning urban environment, provide sufficient development capacity over the next 30 years, and integrate planning decisions with infrastructure planning and funding. This is intended to enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

82. Northwest Auckland is an exceptional case for which the sequencing and 'development-ready' timeframe should not be altered from the status quo.

## Relief

**The submitter's concerns would be addressed if the draft Future Development Strategy was amended in the following way:**

- That the current FDS is withdrawn for the reasons set out in the following feedback and the Council engages with the community and key stakeholders to reconsider the approach to the FDS.

- That no changes are made to the FUZ (including staging) until Plan Change 78 has been approved.

- The FDS should be delayed until the Business Capacity Assessment has been completed.

- Any consequential changes where these are required to give effect to the relief outlined above.

Metlifecare appreciates the opportunity to provide informal feedback on Auckland Council's draft Auckland Future Development Strategy 2023-2053 and thanks the Council staff and elected members for their time in considering the matters that have been raised in this written feedback.

The submitter would welcome contact from staff in the FDS team if any clarification or further information is required.

[redacted]

Campbell Brown Planning Limited
For and on behalf of Metlifecare New Zealand Limited as its duly authorised agent

**Date:** 27 July 2023

**Address for service of submitter:**

Metlifecare
C/- Campbell Brown Planning Limited
PO Box 147001
Ponsonby
**AUCKLAND 1144**

**Attention:** Michelle Kemp

[redacted]

**Attachment A - Letter to Auckland Council**

metlifecare

#8634
Level 4, 110 Carlton Gore Road, Newmarket, Auckland 1023
PO Box 37463, Parnell, Auckland 1151
0800 909 303

30 June 2023

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

**Attention: Future Development Strategy**

Freepost Authority 190153
Private Bag 92300, Victoria Street West
Auckland, 1142

**Feedback on the process used to prepare and publicly consult on the Draft Future Development Strategy**

## 1. Introduction

1.1 Metlifecare New Zealand Limited (**Metlifecare**) wishes to provide feedback regarding the process involved in preparing the Draft Future Development Strategy document (**FDS**) which has been made available for public consultation.

1.2 Metlifecare was established in 1984 and is a leading owner and operator of retirement villages in New Zealand. Metlifecare currently owns and operates a portfolio of 36 retirement villages and 18 care centres located predominantly in New Zealand's upper North Island. Metlifecare provides rewarding lifestyles and outstanding care to almost 7,000 New Zealanders.

1.3 Metlifecare has a significant presence in Auckland with 20 existing villages, an additional three retirement villages currently under development (at Whenuapai, Pukekohe, and Clevedon) and more than 1,900 new retirement living and aged care units planned for completion throughout the Auckland region in the next ten years.

1.4 Metlifecare is providing feedback on the substantive issues in the FDS. However, Metlifecare is concerned with the process followed to prepare and consider submissions on the FDS and is providing this letter in addition to our more substantive comments on the content of the FDS.

1.5 Metlifecare considers that the process followed by Auckland Council to prepare and consult on the FDS does not comply with the requirements in the National Policy Statement on Urban Development 2022 (**NPS-UD**) or the relevant provisions in the Local Government Act 2002 (**LGA**). For the reasons explained below, Metlifecare strongly seeks:

(a) that the FDS is withdrawn and reconsidered; and

(b) that a public hearing is held after the reissued FDS is released for consultation.

## 2. Further consultation and engagement is required before the FDS is released for public consultation

2.1 Under clause 3.15 of the NPS:UD, the Council is required to engage with a range of parties to prepare a draft FDS, including other relevant councils, central government, hapū, and iwi, infrastructure providers, and the development sector. The broader requirements in Policy 10 require the Council to "engage with the development sector to identify significant opportunities for urban development". Engagement with the development sector is also required to identify infrastructure requirements.

2.2 The Council has not complied with its requirements under clause 3.15 of the NPS:UD and Policy 10. Limited information provided by the Council indicates that:

(a) a survey was sent to property developers on the Council's database to understand developer trends and future intentions[1]; and

(b) the Council engaged with The Property Council.

2.3 Metlifecare is a key part of the development sector, and a recognised developer in the Auckland region, but it was not sent a survey or provided an opportunity to engage or contribute to the FDS. Metlifecare is unable to identify any property developers who were surveyed by the Council. It does not appear that the Council surveyed a large proportion of developers in Auckland.

2.4 In any event, a survey seeking to understand trends and intentions of developers is not sufficient engagement and consultation on the FDS. A survey only provides an opportunity to comment on the specific questions posed by the Council. It does not appear that the Council provided information with the survey to comment on.

**3. The process that has been followed does not comply with the requirements in the NPS:UD and the FDS should be withdrawn and reconsidered**

3.1 An FDS spatially shows:

(a) how Auckland Council intends to achieve 'well-functioning urban environments', and

(b) how and where it will provide 'sufficient development capacity' to meet future growth needs over the next 30 years.

3.2 An FDS will be used to:

(a) inform long term plans, including the long-term plan to be prepared in 2024;

(b) set out the development infrastructure and additional infrastructure required and how to integrate planning, infrastructure and funding decisions;

(c) influence and dictate the areas and form of growth; and

(d) determine the infrastructure which will be provided to support that growth.

3.3 The FDS therefore has significant implications on developers considering purchasing land and those with existing assets.

3.4 Consultation and engagement is a fundamental part of preparing an FDS, and part of the reason that the process for creating such a strategy is incorporated into the NPS:UD. Metlifecare is concerned that Auckland Council's approach is unfair and unreasonable because the identification of strategic priorities will have significant impacts on the areas within Auckland that are enabled for growth and Metlifecare has been provided limited opportunity to be involved or provide feedback.

3.5 Metlifecare seeks that the FDS is withdrawn and reconsidered following proper initial consultation with the development sector.

[1] We understand that this survey was sent to people who have recently lodged a building consent with the Council.

**4. The Council must hold a hearing to allow the public to present their views as required by the LGA**

4.1 When preparing or updating an FDS in accordance with clause 3.15 of the NPS:UD, local authorities must use the special consultative procedure in section 83 of the LGA.. Section 83(1)(d) of the LGA provides that the Council must provide an opportunity for persons to present their views to the local authority in a manner *that enables spoken interaction* between the person and the local authority ...".

4.2 Based on the information available on the Council's website, the Council is proposing to make changes to the FDS in response to written feedback and adopt the FDS in late 2023 without holding a public hearing. This approach is entirely inconsistent with the LGA.

4.3 The special consultative process is generally applied to matters that have high significance to the community and may have major implications. As set out above, the FDS will have a material impact on growth and development in the Auckland region. Developers, and the public generally, deserve to have their concerns heard and understood. This right under the LGA has been recognised in other regions across New Zealand including in Nelson (where hearings were held in April 2022 on its FDS) and Rotorua (where a hearing is scheduled for August 2023).

4.4 Metlifecare requests the Council schedules a hearing on the FDS in accordance with the LGA to enable *all persons* who provided feedback with the opportunity to be heard (as required by section 83(1)(d) and (e) of the LGA).

4.5 If you have any queries in relation to this letter, please let us know.

Yours faithfully

**Metlifecare Limited**

Dylan Pell

Upper Harbour Local Board
Auckland Council

Minutes of a meeting of the Upper Harbour Local Board held in the Upper Harbour Local Board Office, 30 Kell Drive, Albany, Auckland 0632, and via Microsoft Teams, on Thursday, 25 May 2023 at 9:35am.

## TE HUNGA KUA TAE MAI | PRESENT

[redacted] (Via Microsoft Teams)
[redacted]
[redacted]
[redacted]

## TE HUNGA KĀORE I TAE MAI | ABSENT

Members [redacted]
[redacted]

## 1 Nau mai | Welcome

The Chairperson A Atkinson opened the meeting with a Karakia.

## 2 Ngā Tamōtanga | Apologies

Resolution number UH/2023/53

MOVED by Chairperson A Atkinson, seconded by Deputy Chairperson U Casuri Balouch:

**That the Upper Harbour Local Board:**

**a) whakaae / accept the apologies from Member J Mclean and Member S Yang.**

**CARRIED**

## 3 Te Whakapuaki i te Whai Pānga | Declaration of Interest

There were no declarations of interest.

## 4 Te Whakaū i ngā Āmiki | Confirmation of Minutes

Resolution number UH/2023/54

MOVED by Member C Blair, seconded by Deputy Chairperson U Casuri Balouch:

**That the Upper Harbour Local Board:**

**a) whakaū / confirm the ordinary minutes of its meeting, held on Thursday, 11 May 2023 as a true and correct record.**

**CARRIED**

## 5 He Tamōtanga Motuhake | Leave of Absence

There were no leaves of absence.

## 6 Te Mihi | Acknowledgements

There were no acknowledgements.

## 7 Ngā Petihana | Petitions

There were no petitions.

## 8 Ngā Tono Whakaaturanga | Deputations

### 8.1 Harbour Hockey Trust - Trees at Rosedale Park Turf Five

Resolution number UH/2023/55

MOVED by Chairperson A Atkinson, seconded by Member C Blair:

**That the Upper Harbour Local Board:**

**a) whiwhi / receive the deputation from Peter Worrall, Harbour Hockey Trust, and Brad Clarke, CEO North Harbour Hockey Association, representing Harbour Hockey Trust, and thank them for their attendance and presentation.**

**b) tono / request advice on undertaking an assessment of the trees at Rosedale Park and any required replacement planting to be brought back to the local board for consideration in the 2023/2024 work programme.**

**CARRIED**

## 8.2 Upper Waitematā Ecology Network - Update

Resolution number UH/2023/56

MOVED by Chairperson A Atkinson, seconded by Member K Parker:

**That the Upper Harbour Local Board:**

**a) whiwhi / receive the deputation from Tim Johnson, on behalf of the Upper Waitematā Ecology Network, and thank him for his attendance and presentation.**

**CARRIED**

## 9 Te Matapaki Tūmatanui | Public Forum

There was no public forum.

## 10 Ngā Pakihi Autaia | Extraordinary Business

There was no extraordinary business.

## 11 Ngā Pānui mō ngā Mōtini | Notices of Motion

Under Standing Order 2.5.1 a Notice of Motion has been received from Chairperson A Atkinson as mover and Deputy Chairperson U Casuri Balouch as seconder for consideration under item 12.

## 12 Notice of Motion - Chairperson A Atkinson - Request that Auckland Council prioritise and fund the development of a detailed plan for the area of Whenuapai zoned Future Urban.

Resolution number UH/2023/57

MOVED by Chairperson A Atkinson, seconded by Deputy Chairperson U Casuri Balouch:

**That the Upper Harbour Local Board:**

**a) request that as a matter of urgency Auckland Council prioritise and fund the development of a detailed plan change for the parts of Whenuapai zoned currently Future Urban. This new plan change should build on the existing structure plan, investigations during plan change 5, and all the significant National Policy Statements and Acts that have come into effect since 2016. These include National Policy Statement on Urban Development, National Policy Statement on Biodiversity, National Freshwater Policy Statement, National Adaptation Plan, National Emission Reduction Plan, and the Parliamentary Commissioner for the Environment Report - 'Are we building harder, hotter cities. It should be a holistic document taking into account the above and including the following considerations:**

- **i) residential development: Very high density of dwellings, more so than what was anticipated in the Structure Plan. These high-density dwellings will need to be surrounded by public biodiverse green spaces to ensure the needs of new residents and the environment are met.**
- **ii) desire for a low carbon community that is engaged and connected**
- **iii) a protected, regenerated and healthy natural environment**
- **iv) a holistic blue-green spatial network plan**
- **v) connected safe neighbourhoods that are easy to get around and prioritise the use of public and active transport**
- **vi) a range of employment options for local residents**
- **vii) waterways, planting and parks. Ensuring there is a high-quality network of these that are managed together through a combination of infrastructure, ecological restoration and urban design. These should be accessible and safe with active community spaces and places**
- **viii) connectivity. How will people connect both with nature, with jobs, with schools**
- **ix) resilience to natural hazards and climate change mitigation. There should be a list of mandated features such as all developments collecting and using their own rainwater, rain gardens, swales, impermeable car parking areas, % of the area for deep soil trees etc**
- **x) the proximity and needs of the Whenuapai Air Base and reverse sensitivity impacts.**

**b) restate resolution UH/2023/14:**

***That the upper Harbour Local Board:***

- ***a) restates resolution number UH/2021/147 from the 18 November 2021 business meeting as follows:***
  - ***a) provide feedback on the Contributions Policy 2021:***
    - ***i) support the overall intent of the policy update***
    - ***ii) note the definition of Northwest includes Whenuapai***
    - ***iii) support inclusion of projects beyond 10-years: the inclusion of strategic projects over a longer period of time (over 10 years) ensures all developers contribute equitably to the infrastructure and amenity required as a result of growth***

*iv) support requiring developers to pay their contributions earlier: with the ability to negotiate staging the payment timing of contributions for small scale developments.*

*b) request that the draft Contributions Policy 2022, Variation A is expanded as fast as possible to all areas noted in the Investment Priority Areas as not extending this policy will lead to perverse and unfair outcomes if areas get developed without enough development contributions collected.*

*c) note that Whenuapai is rapidly changing from Future Urban to Urban and is the subject of many private plan changes so we need to ensure enough development contributions are collected.*

*d) request that consideration be given to reviewing the development contribution policy to areas outside the Investment Priority Areas.*

*e) note large-scale development is happening all around our city and there is a need that the development contributions received cover all associated growth-related capital expenditure. Many of these new developments are very intensified so residents both need and expect access to well developed parks and open spaces, roading, active transport modes and stormwater.*

*f) note that development contributions allow for an equitable and proportionate share of the total cost of growth-related capital expenditure to be recovered from the development community.*

*g) request a review of Development Contributions in Special Housing Areas to ensure developers pay for growth-related capital expenditure.*

*h) note the Special Housing Area of Scott Point, Auckland Council is paying for playgrounds and sportsfields not developers.*

*i) request that stormwater planning gets added as a priority to all development contribution calculations (the report notes stormwater will be added when info becomes available).*

*j) request that stormwater and infrastructure planning is appropriate to deal with the more frequent flooding events we are having.*

**c) consider it vital that the Development Contributions Policy in place for Drury is expanded to include Whenuapai as soon as possible given how quickly development is occurring. We need to ensure that developers pay for infrastructure that will be required over the longer-term planning horizon.**

**d) request the opportunity to speak to the Planning and Environment Committee on this matter.**

**CARRIED UNANIMOUSLY**

## 13 Endorsing Business Improvement District (BID) targeted rate grant for 2023/2024

The Business Improvement District (BID) Senior Advisor, Gill Plume, was in attendance via Microsoft Teams to support the item.

Resolution number UH/2023/58

MOVED by Member C Blair, seconded by Member K Parker:

**That the Upper Harbour Local Board:**

**a) tohutohungia / recommends to the Governing Body the setting of the targeted rate of $782,938.00 for inclusion in the Annual Budget 2023/2024 for Business North Harbour Incorporated as part of the Business Improvement District programmes.**

**CARRIED**

## 14 Community Partners Interim Service and Funding Approach for 2023/2024

The Place and Partner Specialist, Jamie Adkins, was in attendance via Microsoft Teams to support the item.

Resolution number UH/2023/59

MOVED by Deputy Chairperson U Casuri Balouch, seconded by Chairperson A Atkinson:

**That the Upper Harbour Local Board:**

**a) whakatārewa / defer the Community Partners Interim Service and Funding Approach for 2023/2024 report to the 22 June 2023 business meeting and request that staff present an update that includes a twelve week proportionate interim payment to Hobsonville Community Trust and Meadowood House Incorporated based on twelve weeks of the current 2022/2023 budget allocation.**

**CARRIED**

## 15 Approval to name two new private roads at 2 Falcon Crescent, Hobsonville.

Resolution number UH/2023/60

MOVED by Chairperson A Atkinson, seconded by Member C Blair:

**That the Upper Harbour Local Board:**

**a) whakaae / approve the names 'Rakau Road' and 'Mataitai Road' (applicant's preference) for two new private roads created by way of the Stage 2 subdivision being undertaken by Falcon Green Limited at 2 Falcon Crescent, Hobsonville in accordance with section 319(1)(j) of the Local Government Act 1974 (resource consent references BUN60305624, SUB60394076-1 and RDN90108220).**

**CARRIED**

## 16 Hōtaka Kaupapa / Governance forward work calendar

Resolution number UH/2023/61

MOVED by Member C Blair, seconded by Member K Parker:

**That the Upper Harbour Local Board:**

**a) whiwhi / receive the Upper Harbour Local Board Hōtaka Kaupapa / governance forward work calendar for May 2023 – July 2023.**

**CARRIED**

## 17 Workshop records

Resolution number UH/2023/62

MOVED by Member C Blair, seconded by Member K Parker:

**That the Upper Harbour Local Board:**

**a) whiwhi / receive the records of the Upper Harbour Local Board workshops held on Thursday 20 April 2023, and Thursday 4 May 2023 (refer to attachments A and B).**

**CARRIED**

## 18 Local Board Members' Reports - May 2023

The Chairperson A Atkinson tabled a letter received from the Hon David Parker, Minister for the Environment. A copy has been placed on the official minutes and is available on the Auckland Council website as a minute attachment.

The Deputy Chairperson U Casuri Baloch tabled the original letter to the Hon David Parker, Minister for the Environment, dated 14 April 2023. A copy has been placed on the official minutes and is available on the Auckland Council website as a minute attachment.

Resolution number UH/2023/63

MOVED by Member K Parker, seconded by Deputy Chairperson U Casuri Balouch:

**That the Upper Harbour Local Board:**

**a) whiwhi / receive the verbal local board members reports from Member C Blair, Deputy Chairperson U Casuri Balouch, Member K Parker and Chairperson A Atkinson.**

**CARRIED**

**Attachments**

A 25 May 2023, Upper Harbour Local Board: Item 18 - Local Board Members Reports - May 2023 - Letter received from Hon David Parker.

B 25 May 2023, Upper Harbour Local Board: Item 18 - Local Board Members Reports - May 2023 - Letter to Hon David Parker 14 April 2023.

## 19 Te Whakaaro ki ngā Take Pūtea e Autaia ana | Consideration of Extraordinary Items

There was no consideration of extraordinary items.

11.01 am The chairperson thanked members for their attendance and attention to business and closed the meeting with a Karakia.

CONFIRMED AS A TRUE AND CORRECT RECORD AT A MEETING OF THE UPPER HARBOUR LOCAL BOARD HELD ON

_____ .....

_____ .....