Auckland Council
Te Kaunihera o Tāmaki Makaurau

Future Development Strategy

Pro-Forma

WRITTEN FEEDBACK

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

Pro-forma #1

EXTRA FOUR WEEKS TO DECIDE AUCKLAND'S FUTURE !



Have your say on how our city grows

SUBMISSION PERIOD EXTENDED

Now just 33d, 10h, 17m, 31s left to **MAKE A SUBMISSION**

The Auckland Council's Future Development Strategy was unveiled quietly for the first time in May this year. In June the people of Auckland were given just four weeks to comment on a document that will govern the development of this city through to 2050. But hardly anyone has even heard of it.

Thanks to public pressure, this period has been extended until 31 July 2023

So what is it about?

The strategy, which has serious implications for everyone living in Auckland, relies on faulty and outdated data and is being rushed through with only a four week submission period. The claim is that it will:

- Reduce carbon emissions
- Adapt to the changing climate
- Enable equitable infrastructure
- Protect the natural environment
- Enable sufficient growth

What does it mean for Aucklanders?

- Severely restrict all further greenfield development until at least 2050
- Force intensification into existing urban areas that do not have the necessary infrastructure to support such development
- Discourage existing development
- Underserve the 50% of ratepayers in greater Auckland's rural areas whose contribution pays for central city benefits they will never see

Aucklanders know this is wrong:*

- A majority of Aucklanders (58%) support either greenfield development or a mix of greenfield and intensification to meet Auckland's future housing needs
- Fewer than 1 in 5 Aucklanders support intensification on its own
- Over seven in ten Aucklanders don't believe Auckland is infrastructurally equipped to successfully deliver intensified housing

** Omnibus Survey: May 2023*

If allowed to proceed as it is, what will the FDS focus on Intensification actually achieve?

Increased cost of housing

- Making housing affordability more difficult to address
- Making affordable rental houses harder to deliver
- Making Auckland less affordable and desirable to live

Increased strain on our core services: Power, Water, Sewerage, Transport

- The 2023 flooding demonstrated our stormwater burden. Intensification will worsen this
- Traffic congestion issues will get even worse, costing Aucklanders time and productivity
- Weather and maintenance events causing power outages will affect more people and will be harder to address
- Unswimmable beaches will become an even more common occurrence as services fail to cope with demand

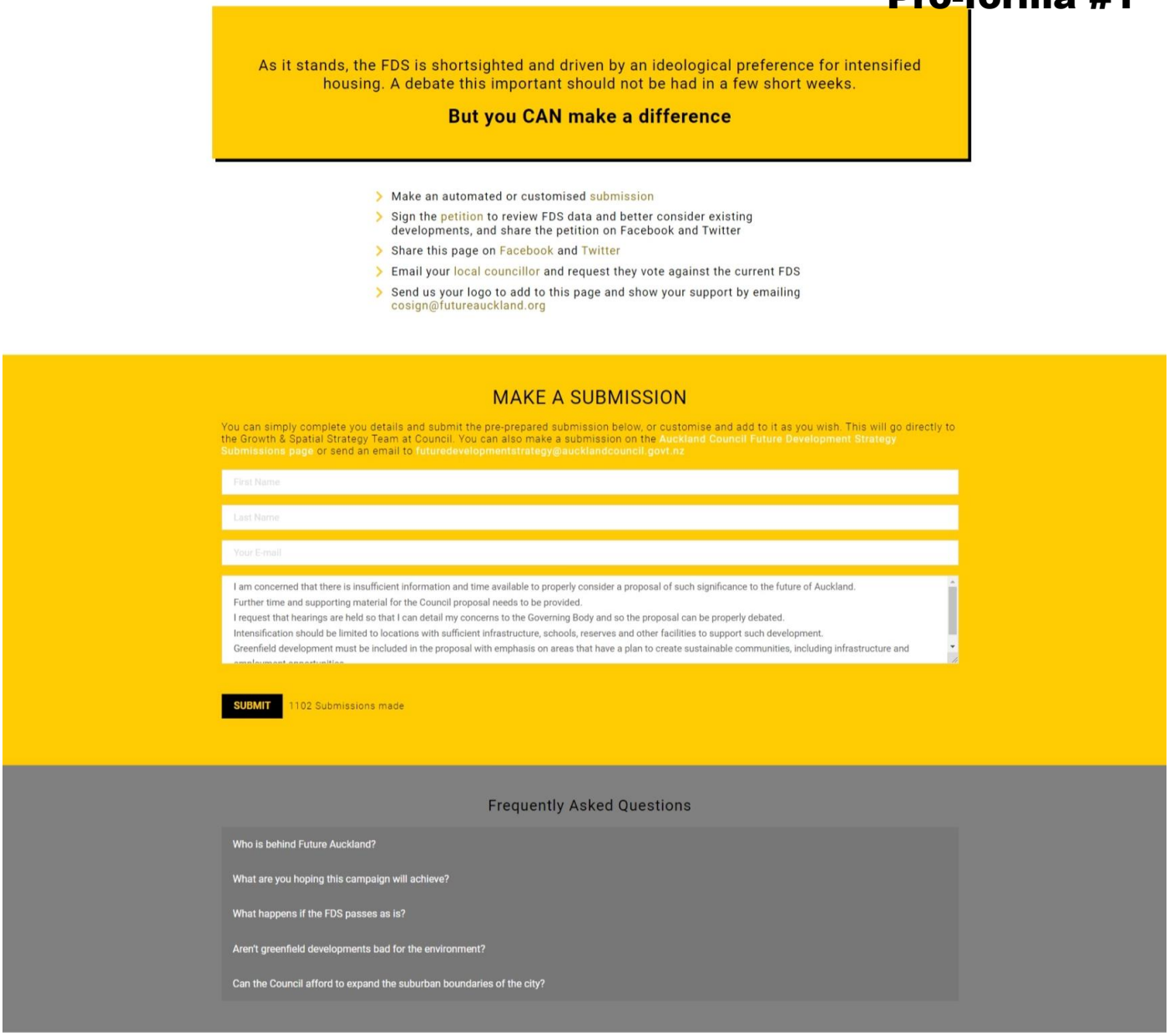
Increased pressures of population growth

- Making Auckland a less competitive city internationally, as strained service delivery produces a less attractive and more expensive place to live
- Reduced communal spaces and well-maintained amenities as ad hoc higher density housing springs up with little forethought
- Halting development of existing sustainable communities, especially north of Albany where cheaper or more accessible options are available

Increased strain on our construction sector, when we need it most to deliver

- Reducing employment opportunities while the cost of living soars
- Negatively impacting the supply of goods & services to our communities

Pro-forma #1



" I am concerned that there is insufficient information and time available to properly consider a proposal of such significance to the future of Auckland. Further time and supporting material for the Council proposal needs to be provided. I request that hearings are held so that I can detail my concerns to the Governing Body and so the proposal can be properly debated.

Intensification should be limited to locations with sufficient infrastructure, schools, reserves and other facilities to support such development. Greenfield development must be included in the proposal with emphasis on areas that have a plan to create sustainable communities, including infrastructure and employment opportunities"

Pro-forma #1

Future Auckland

A CONCERNED COLLECTIVE

Our numbers are growing every day. In just a few short days since learning about the Auckland Council Future Development Strategy and its consequences, business and residents are showing their concern and support, by adding their logo or name to this page. Add yours here!



Pro-forma #2

BAYLEYS

19th June 2023

I hope this letter finds you well. I am reaching out to provide you with important information regarding the council's proposed updates to the FULSS (Future Urban Land Supply Strategy). These proposed changes are expected to have a significant impact on land value, and it is crucial for you to be aware of them.

The council is suggesting a shift in the timeline for development, with some areas being downzoned from Future Urban to a rural zoning. Additionally, several areas are being marked for "further investigation" to determine their suitability for urbanisation within the next 30 years. As a result, these changes are likely to adversely affect the value of land within the Future Urban zone and the surrounding rural zones.

To learn more about these proposals, I encourage you to visit the council's website at: https://akhaveyoursay.aucklandcouncil.govt.nz/future-development-strategy

As a local real estate agent specialising in this area, I believe it is crucial for you to voice your opinion and help safeguard the value of one of your most significant assets. This is particularly important considering that your rates are based on Future Urban land sales with previous indicative zoning time frames.

Enclosed with this letter, you will find a high-level map outlining the council's proposed changes. The council is also introducing an infrastructure trigger-based system that necessitates substantial infrastructure upgrades before an area can be developed or a private plan change can be requested. Unfortunately, this approach does not allow for a phased development process.

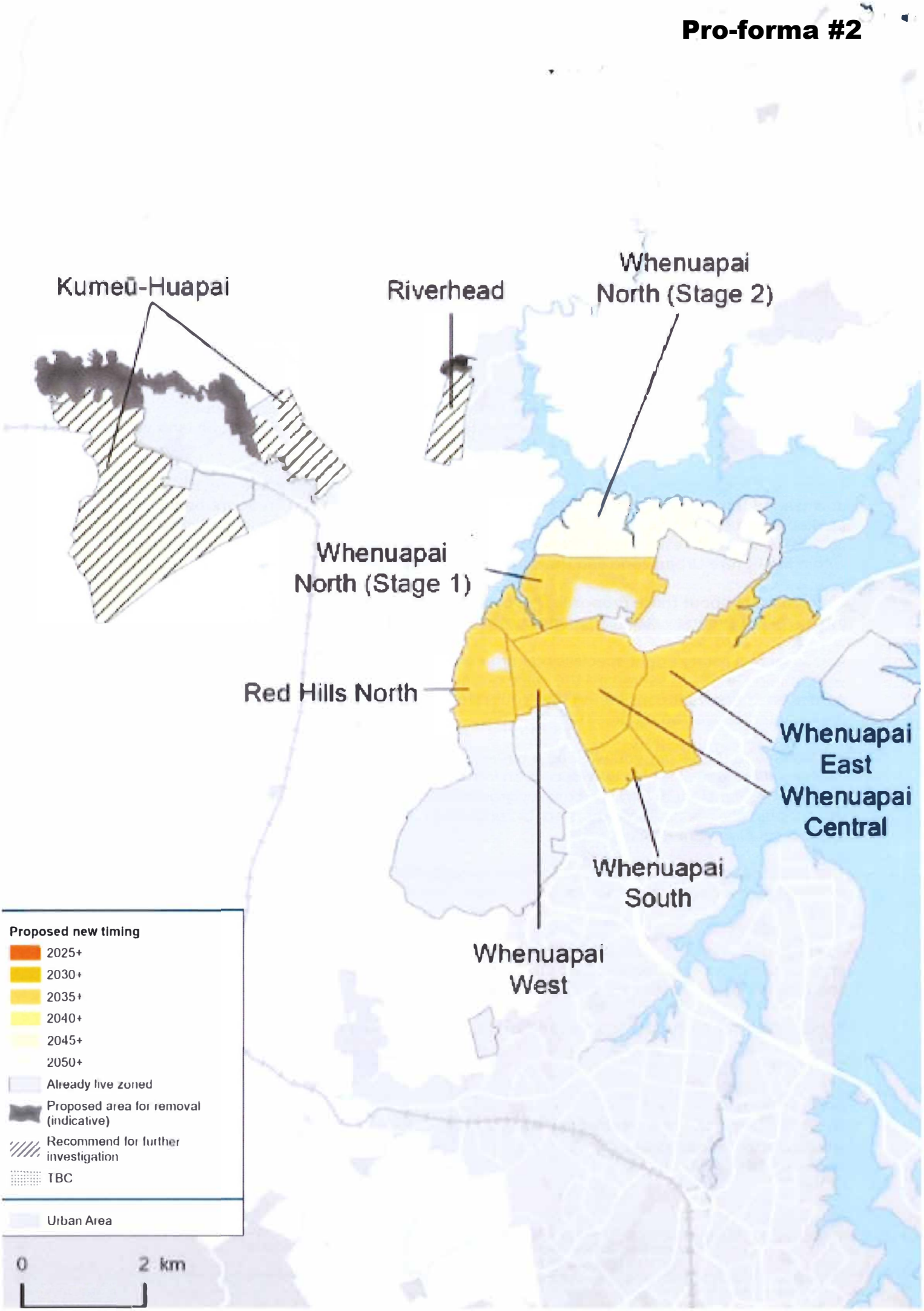
The council is currently accepting submissions regarding its new direction, and I have included an overview document for your review. The deadline for submissions is the 4th July 2023

Furthermore, I have collaborated with consultants and developers to prepare a submission on your behalf. I kindly request that you review the submission and, if in agreement, fill, sign, and return it to the council using the enclosed envelope.

If you would like to discuss this matter further, please do not hesitate to contact me.

Sincerely,

Bayleys Real Estate Ltd, Northwest, Licensed under the REA Act 2008
1/48 Maki Street, Northwest Shopping Centre, Westgate
+64 9 953 4740 | bayleys.co.nz


Kumeū-Huapai
Riverhead
Whenuapai North (Stage 2)
Whenuapai North (Stage 1)
Red Hills North
Whenuapai East
Whenuapai Central
Whenuapai South
Whenuapai West
Proposed new timing
2025+
2030+
2035+
2040+
2045+
2050+
Already live zoned
Proposed area for removal (indicative)
Recommend for further investigation
TBC
Urban Area
0
2 km

Pro-forma #2

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

My name is

Date

Address

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

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

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

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

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

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

5. The FDS ignores the unsatisfied demand for employment zoned land especially land for large footprint buildings. No business capacity study has been published yet no new business sites can be created in brownfields areas. As a result, the price of such land will continue to skyrocket while the FDS completely misses an opportunity to create sustainable residential communities close to new employment areas. We have been approached by a number of potential purchasers who cannot find industrial/business land in the area who finish up generally heading south to Waikato. Furthermore when we meet with Council and transport engineer to be shown where the future road is planned (which differed greatly in our area to what was presented at the public consultation of the unitary structure plan at Pukekohe town centre) the council representative and roading engineer were not aware of the adopted structure plan.

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

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

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

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

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

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

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

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

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

Signed

Pro-forma #3

Dear Neighbours,

I believe you all heard the recent FDS proposal announcement by council, the public survey until 31 July 2023, the proposal affects all of our Land, here we write a letter to opposing council's FDS, we need your support to sign and submit to Council, sooner the better.

Here is the freepost:

To: Auckland Council
Attn: Future Development Strategy
Freepost Authority 19053
Private Bag 92300, Victoria Street West
Auckland 1142

You could also sign, attach it and send me back the email, I will post together later.

Please ring me for any more information share or deliver.
Thank you so much for your support!

Pro-forma #3

27 June 2023

Name
Address Line 1
Address Line 2
Address Line 3

Dear owners of current Future Urban Zoned land,

I hope this letter finds you well. I am writing to you as a concerned member of our community regarding an issue that directly affects our interest and the value of our properties. It has come to my attention that the Council is proposing updates to the Future Urban Land Supply Strategy and has proposed a plan to shift the timeline for development. I am deeply concerned about the expected adverse impact this change would have on our land value.

The Council's Future Development Strategy 2023-2053 ("FDS plan") entails significant changes and proposes to downgrade some Future Urban Zones to rural zoning, and several other areas are still pending confirmation of their suitability for urbanisation within the next 30 years. These changes have significant impacts to the value of current Future Urban Zone land and the surrounding rural zones. It is crucial that we voice our opinion and safeguard the value of our assets. Several key concerns have been highlighted in the enclosed opposition document attached to this letter.

Given the gravity of these concerns, I believe that presenting a united front and voicing our concerns will have a greater impact on the Council's decision making process. You can find out more about the Council's proposals by vising the Council's website below:
https://akhaveyoursay.aucklandcouncil.govt.nz/future-development-strategy

The Council has invited submissions regarding its proposals, and the **deadline for submissions is 4 July 2023.** In light of the urgency of the matter, I kindly request your support in opposing the Council's FDS plan by carefully reading the signing the enclosed opposition document. Please make sure to **sign and send out this document to the Auckland Council address before 4 July 2023**.

Sincerely,

Name
Contact

Pro-forma #3

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Name _____ Phone _____

Address _____

_____

Signed _____

Dated _____