Future Development Strategy

Organisations

WRITTEN FEEDBACK
Volume 6

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

Future Development Plan 2023 #8137

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

Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Please refer to attached submission

Accessible local centres

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

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

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

Other

Tell us why

Please refer to attached submission.

Avoiding hazards

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

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

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

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

Disagree

Tell us why
Please refer to attached submission.

Resilient infrastructure

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

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

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

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

Other

Tell us why
Please refer to attached submission.

Other feedback

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

Please refer to attached submission.

#8137

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SUBMISSION ON DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY

TO:	Auckland Council ("**Council**")
SUBMITTER:	Summerset Group Holdings Limited ("**Summerset**")
SUBMISSION ON:	Draft Auckland Future Development Strategy ("**Draft FDS**")

Summary

1. Summerset is one of New Zealand's leading and fastest growing retirement village operators, with more than 7,400 residents living in our village communities, offering a range of independent living options and care, meaning that as residents' needs change, they have support and options within the village. Summerset has 39 villages which are either completed or in development and a further 11 greenfield sites, spanning from Whangārei to Dunedin, and employs over 2,400 staff members across its various sites.

2. Summerset welcomes the opportunity to submit on the Draft FDS, which proposes changes to the vision for how and where Auckland is to grow over the next 30 years, to achieve the best outcomes for the region. Due to Summerset's active involvement in land development (including resource consent and private plan change processes) across Auckland, it is highly familiar with the subject matter of the Draft FDS.

3. In its current form, the Draft FDS fails to comply with the requirements of the National Policy Statement on Urban Development 2020 ("**NPS-UD**"). In particular the Draft FDS:

   (a) does not provide for sufficient development capacity, and places too much reliance on intensification anticipated to be enabled through Plan Change 78 ("**PC78**") to provide for that capacity, despite PC78 still being in its infancy, the plan change process currently paused, and the outcomes of that process yet to be determined;

   (b) does not provide for well-functioning urban environments by failing to adequately consider the infrastructure constraints within existing urban areas, and the

significant opportunities that greenfield development can provide for master planned, well-integrated development;

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

(d) applies overly blunt principles to development in areas subject to natural hazard risks.

4. Summerset is concerned that inadequate consultation has occurred in the preparation of the Draft FDS. More work is required to properly consider which areas of Auckland are appropriate for future growth, and the timing of that growth.

5. In light of the above, Summerset considers further work is required by Auckland Council to ensure the Draft FDS fulfils the requirements of the NPS-UD. Summerset seeks that:

(a) the Draft FDS's consultation period under section 83 of the Local Government Act 2002 be further extended to allow further work to be undertaken by the Council to identify areas appropriate for intensification – the extension to 31 July is acknowledged, but is considered insufficient given the work to be undertaken, the significance of the FDS for future RMA processes, and hazard identification processes ongoing following Cyclone Gabrielle and the Auckland Floods; and

(b) the Council delay the adoption the Draft FDS to be in conjunction with the finalising of PC78 and the adoption of the next Long Term Plan.

Key Statutory Requirements

6. The NPS-UD provides the legal basis for preparing the Draft FDS.[1] The Draft FDS must be prepared every 6 years and in time to inform, or at the same time as, Auckland's next long-term plan,[2] which we understand is being updated in 2024.

7. The purpose of the Draft FDS is to promote long-term strategic planning by setting out how the Council intends to achieve well-functioning urban environments in both its existing and future urban areas, and provide sufficient development capacity as required by the NPS-UD over the next 30 years. The FDS is also intended to assist the integration of planning

[1] NPS-UD, clause 3.12.
[2] NPS-UD, clause 3.12(1).

decisions under the Resource Management Act 1991 ("**RMA**") with infrastructure planning and funding decisions.[3]

8. The NPS-UD sets out a prescriptive criterion of sources of information that must be considered in informing the Draft FDS. This includes:

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

   (b) consideration of different spatial scenarios for achieving the purposes of the FDS; relevant long-term plans;

   (c) infrastructure strategies or any other relevant plan or strategy;

   (d) the feedback received from this consultation;

   (e) every National Policy Statement; and

   (f) any other relevant national policy required or issued under legislation.[4]

9. Once an FDS is prepared, the Council will be required to have regard to it when preparing or changing RMA planning documents.[5] On that basis it has the potential to significantly influence RMA decision making processes.

10. The primary reason for, and fundamental direction of the NPS-UD, is to address the issue of insufficient appropriately zoned land to meet housing and business development demand. In light of that purpose, the NPS-UD's first and overarching concept is to provide for well-functioning urban environments, which enable a variety of homes that meet communities' needs, as well as enable a variety of sites that are suitable for different business sectors, among other things. Summerset considers this is fundamental to the application of the NPS-UD, as it indicates that the NPS-UD is not intended to be incorporated into plans in a blunt manner. Rather, regard must be had to nuances of specific environments, including the appropriate type, scale and location of housing, depending on the particular context.

Providing for sufficient development capacity

11. As mentioned above, the Draft FDS is required to set out how the Council intends to provide at least sufficient development capacity (as required under the NPS-UD) over the next 30 years. In order to be considered as *sufficient* development capacity, under the NPS-UD, development capacity must be plan enabled, infrastructure ready, feasible and reasonably

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3 NPS-UD, clause 3.13(1).
4 NPS-UD, clause 3.14.
5 NPS-UD, clause 3.17.

expected to be realised (or for business land, suitable to meet the demands of different business sectors), and meet the expected demand plus the appropriate competitiveness margin.[6] In light of those requirements, Summerset considers that the Draft FDS does not fulfil the requirement of delivering sufficient development capacity, given it limits development capacity and places even greater load on existing infrastructure, which in many cases, are already at, or exceeding capacity.

Over reliance on PC78 to deliver infill capacity

12. The Draft FDS estimates that the total plan enabled net housing capacity for Auckland is 2,345,500 (which includes proposed PC78 enabled residential capacity (with all qualifying matters applied)).[7] However, while the Council in the Draft FDS considers that the feasibility of plan enabled development changes improves over time, as new amenities are created and accessibility through transport investment improves, it also considers that the plan enabled capacity far exceeds infrastructure capacity - existing, planned or likely - in many locations.

13. The Council's approach is fundamentally flawed because it places significant reliance on PC78 in determining plan enabled development capacity in the region. Given PC78 is still in its infancy, and has been paused, a conservative approach should be taken in determining development capacity, both in terms of overall supply and location because:

(a) Natural hazards work is still being undertaken. Due to the Auckland Floods and Cyclone Gabrielle, the Council is undertaking further work to determine appropriate areas of Auckland for intensification on the basis of natural hazard risks (this being one of the critical reasons PC78 was paused to begin with). Until this further investigation has been completed, there is an element of uncertainty as to whether there will be sufficient development capacity in Auckland in the long-term. It cannot be the case that greenfield areas are being precluded on the basis of natural hazard risks now, while brownfield areas continue to be investigated. These risks (and corresponding impacts on where development capacity is enabled), must be considered holistically and consistently, and at such a time where more certainty on the relied upon assumptions under PC78 are clarified and at the very least more certain especially when making such a fundamental assumption underpinning the FDS.

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

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

(c) Residential development capacity enabled by PC78 is not based on developments that are "ready to be built". Many of the dwellings that are forecasted to be enabled by PC78 are not economically viable to develop or may not have the supporting infrastructure to enable those developments. Other factors such as cross-lease, unit, and leasehold titles for many properties will also further restrict developers' ability to intensify and meet those projected forecasts.

14. By removing and delaying some areas for development from Future Urban Zoning and increasing the reliance on infill developments through the Draft FDS, Council has placed far too much reliance on the capacity of the region's brownfield areas alone to provide sufficient long-term development capacity, as is required under the NPS-UD. Perversely, if the FDS is confirmed before PC78 is finalised, PC78 will be required to have regard to the Draft FDS as currently proposed, perpetuating poor development outcomes.

15. Private plan changes are supplementary tools to ensure planning frameworks remain flexible and responsive to the changing needs of communities and the environment over time (noting that under the RMA Councils are otherwise only mandated to review and update their plans every 10 years or in accordance with national direction). Summerset accepts that while the Draft FDS appropriately seeks to reduce the need to undertake private plan changes, the long-term nature of the Draft FDS (and 6-yearly review cycle of district plans) means that private plan changes will still play an important role in ensuring the planning framework remains agile and responsive to the changing needs of the community over time.

More nuanced approach to managing natural hazard risks should be provided for

16. The Draft FDS has also placed a strong emphasis on the New Zealand Coastal Policy Statement's policies directive avoidance of development in areas of coastal hazard risk,[8] to the extent its principles require the avoidance of further growth in areas exposed to hazards.[9]

17. Summerset is supportive of the approach to generally avoid areas at high natural hazard risk. However, there are a range of existing incentives on landowners and developers to ensure that any future development occurs in a way that appropriately manages those risks. Council's approach of blacklisting areas that could potentially be developed, subject to appropriate natural hazard mitigation, is overly blunt, especially when an appropriate engineering solution could be put in place that appropriately manages the risk.

18. In developing its approach to managing development in areas subject to hazards, the Council must consider other incentives that on developers to build good, high-quality developments that address, manage, and mitigate hazards. For example, more stringent building standards

8 NZCPS, Policy 25.
9 Draft FDS, at page 17.

needing to be met for obtaining building consent, or insurance. In some instances, new developments in coastal risk areas are expected to improve risk outcomes for properties in those areas, such as where a new development will fund or construct a sea wall that would not have otherwise been viable. Further work on a consistent, national approach to managing development in hazard risk areas, and managed retreat, is also expected to occur through the new Climate Change Adaptation Act. It is critical that the Draft FDS does not preclude or undermine that further work and risks unnecessarily constraining development in the interim.

Supply of sufficiently sized (and zoned) land

19. The Draft FDS notes that business land, specifically large format retail, has experienced issues with the supply of sufficiently sized land within the region to establish new development and business centres. The Draft FDS further acknowledges that several suitable sites for those business and commercial activities have been identified in future urban areas and recognises the need to protect and preserve those areas for those purposes.

20. Whilst not a large format retail developer, Summerset's requirements for sufficiently sized land that is appropriately zoned for its business operations are similar. It is entirely appropriate that the challenges of suitable land availability that large scale developments, such as aged care facilities face should be expressly acknowledged and addressed through the Draft FDS.

Loss of Future Urban Land

21. The Council through the Draft FDS is proposing to make significant changes to established future urban areas, in particular, by rolling back some areas that are already planned for development, investigating the potential removal of other areas deemed unsuitable for development due to natural hazard risks, and delaying with uncertainty the live-zoning of substantial amounts of the remaining future urban zoned land.

22. Those changes will lead to adverse outcomes and have implications on achieving the NPS-UD's objective of providing for well-functioning urban environments, by delaying or stopping a significant number of much needed new developments across the region. Given the ongoing housing crisis the region is experiencing, increasing supply of developable land and streamlining future development should be a key focus of the Draft FDS. However, as it currently stands, that focus is convoluted and significantly undermined by what is currently proposed.

Infrastructure funding constraints

23. Under the NPS-UD, development capacity is considered infrastructure ready if:

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

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

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

24. The Draft FDS appears to be underpinned by the premise that infill development utilising existing infrastructure, in light of its limited financial resources, is cheaper than greenfield development and preferred in the short, medium and long term. Summerset acknowledges that infrastructure investment is a complex challenge that requires a good understanding of development needs in the short, medium and long term. However, while often new greenfield developments have higher infrastructure costs upfront in the short term, which are then paid for over time through development contributions, it can provide more significant and cost-effective benefits over the longer term. Just recently the Council changed its development contributions policy to provide for a longer-term horizon for funding of infrastructure in high priority growth areas (most recently to provide for greenfield development in Drury). From a practicability perspective, Council's development contributions policies and FDSs should complement each other, that is to say that the Council has the tools available to provide for infrastructure in greenfield areas with prudent planning.

25. In many cases, brownfield development can be subject to the same, or more significant infrastructure constraints. Many brownfield areas are already over-capacity (for example, this is evidenced through the repeated instances of raw sewage being discharged in waterways and harbours during significant rain events), which may impact its feasibility for future upgrades (and therefore, tying into the development capacity of an area), should all be factors that urge Council to exercise more nuanced decision-making in relation to infrastructure investment. The end result of such an approach of favouring infill development (as proposed under the Draft FDS), may again lead to perverse outcomes from an infrastructure perspective, whereby old assets are attempted to be upgraded solely to try and keep up with capacity only to be at the mercy of what is an aging asset.

26. In Summerset's experience, unless public infrastructure funding is identified and provided for in a Long Term Plan and considered "in sequence", a disproportionate cost of infrastructure upgrades are funded privately. If Council is to restrict most new development to indiscriminate infill areas, Summerset is concerned that nearly all new development will not be specifically

identified in future Long Term Plans, and therefore, the development community will be left to carry a greater and more prohibitive share of the cost of public infrastructure upgrades.

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

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

(b) provision of a greater variety of housing choices to meet the needs of the communities. For example, the housing needs of the elderly, those with disabilities, and young families are each going to be very different. The Council's analysis around the need for growth specifically notes and recognises Auckland's aging population, however, there is no reference within the Draft FDS as to how the aging population is to be accommodated or planned for. The reality is that aged care housing is far more challenging to accommodate through brownfield development. This is because brownfield is smaller scale, taller buildings and more restrictive in its ability to provide for accessibility, healthcare and ancillary services, and fit for purpose spaces for the elderly; and

(c) similarly, the needs of industrial and other commercial development will be very different to other residential land uses and arguably face greater supply challenges through infill while also exacerbating reverse sensitivity effects.

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

29. Similarly, as it currently stands, with the Draft FDS removing greenfield areas from development, this will create additional pressure on existing live zoned land which will in turn significantly affect the value of property and land, in the midst of a housing and cost-of-living crisis. Retirement villages provide necessary social infrastructure for our aging population, and are typically developments dense in form that free up hundreds of houses as residents sell their homes and move in. However, the reality is that retirement villages require land of a scale that infill zoning cannot typically provide or accommodate. Council's deterrence of

greenfield development will lead to fewer housing and care options for the elderly, and exacerbate Auckland's housing supply and affordability crises.

Well-functioning urban environments

30. As currently proposed, the Draft FDS does not give effect to the objective of the NPS-UD to provide for well-functioning urban environments. In particular, the Draft FDS fails to appropriately consider options that achieve well-functioning urban environments, in terms of providing for a range of housing options (both brownfield and greenfield developments), and the ability to ensure new development is well integrated with infrastructure, community spaces and green open spaces, and active transport nodes. There is naturally less scope to achieve this integration through infill, as development operates within the constraints of existing, poorly planned, urban areas. Summerset acknowledges a good portion of development capacity must be provided through infill, but without careful planning (which PC78 is yet to demonstrate), this intensification will not contribute to well-functioning urban environments.

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

Engagement and procedural concerns

32. In preparing the Draft FDS, the NPS-UD expressly requires the Council to engage with the development sector to identify significant future development opportunities and infrastructure requirements.[10] However, to date (and as acknowledged in the Draft FDS's evidence report), Council has only consulted with the development sector through a limited survey, and through engagement with the Property Council of New Zealand.[11] Summerset considers that Council's engagement thus far has been inadequate for meeting its obligations under the NPS-UD.

33. That engagement with the development sector is critical to ensure there is a connection between the Council's Draft FDS and reality. By failing to engage with the development sector in a comprehensive manner, Council will lack a good understanding of both current and future development projects in the pipeline and of the land requirements for those projects. This in turn will create a significant risk that the amount and location of urban land identified by the

10 NPS-UD, clause 3.15(f).

11 Auckland Draft Future Development Strategy – Overall Evidence Report, page 89.

Council through the Draft FDS will not reflect development realities and/or needs. That is exactly what has played out in practice here.

34. In addition, Summerset remains concerned that there is insufficient information and time available to properly give consideration to a proposal of such significance. Further time (beyond the July 31 extension) is required, given the further work the Council needs to do in order to demonstrate the Draft FDS is achieving the criteria of the NPS-UD. Summerset considers it appropriate that the Draft FDS be considered and crafted at the same time the next Long Term Plan is being developed and PC78 is finalised (per paragraph 37(c) below), to ensure that there is an overall level of consistency and workability between those instruments.

35. While the Draft FDS contains a section regarding implementation, particularly through an implementation plan, feedback on the implementation plan should be released for feedback in conjunction with the Draft FDS for public feedback, given how inherently interlinked the two documents are.

36. Finally, given the significance the Draft FDS has on Auckland's future development planning, Summerset considers that a more extensive consultative process is necessitated, rather than what Council has currently provided. To ensure that a proposal of such significance has been adequately consulted on with the public, and in the interests of natural justice, Summerset seeks that Council hold, at the very least, a robust formal hearings process (rather than a limited hybrid conference), which provides the public with the opportunity to provide further submissions and evidence to assist with deliberations.

Relief sought

37. Summerset seeks that:

(a) the Draft FDS's consultation period under section 83 of the Local Government Act 2002 be extended to allow further work to be undertaken by the Council to identify areas appropriate for intensification;

(b) the Council prepare and release the Draft FDS's implementation plan for consultation in conjunction with the Draft FDS for public consideration; and

(c) the Council delay the adoption of the Draft FDS to be in conjunction with the adoption of the next Long Term Plan and confirmation of PC78.

38. If the primary relief sought by Summerset, as set out above, is not accepted, then Summerset seeks that:

(a) appropriate greenfield development capacity is enabled, particularly for master planned comprehensive developments that cater for housing needs of vulnerable groups;

(b) infrastructure triggers are removed where serviceability is enabled through the use of existing tools;

(c) a more nuanced and risk-based approach is taken to natural hazards; and

(d) retain the existing Future Urban Zone and timings for live-zoning of Future Urban zoned land.

39. Summerset would be open to engaging further with the Council on the matters raised in this submission if that would assist the Council. If there is an opportunity to speak to the submission, Summerset would also be willing to do so.

Yours faithfully



Future Development Plan 2023 #8141

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Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

Bike Auckland has a strong preference for increased density in the city. For too long, the city has tolerated sprawl - it has increased infrastructure costs exponentially and there is a lot of space within exisiting city limits for gentle densification (3-4 storey multi family apartments and townhouses).

Accessible local centres

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

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

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

Agree

Tell us why

The best return on investment is close to existing centres. Let's encourage people there by giving them liveable spaces that are safe and attractive to walk, cycle and take public transport. The

motorway network is particularly useful for motor vehicles. Let the local centres be human designed, not as arterial routes for motorists. Let's encourage people to spend time and money locally in our precious local centres - 4 lanes of loud, fast traffic does little to encourage that. Let Karangahape Road be the example here.

Avoiding hazards

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

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

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

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

Agree

Tell us why

Bike lanes are particularly resilient through parks and other flood-prone rain collection areas - they receive very little heavy traffic, so tend not to crack up like roads under the weight of trucks. This is a sensible policy and may encourage the gentle densification that Auckland requires.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Bike lanes are particularly resilient through parks and other flood-prone rain collection areas - they receive very little heavy traffic, so tend not to crack up like roads under the weight of trucks. This is a sensible policy and may encourage the gentle densification that Auckland requires.

Other feedback

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

'The development strategy is a critical part of delivering on the TERP, which aims to “Supercharge Walking and Cycling”. It says:

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

Please follow the analysis and make bike infrastructure the first dollar you spend. It is almost certainly the best benefit-cost ratio of spending you will ever make. Most roads have a BCR of less than one. Almost zero bike infrastructure has a BCR of than one.

Bike infrastructure supports climate action directly - many cycle trips replace car trips. It also makes the road safer for EVERYBODY, including those in SUVs, trucks and cars.

As a peak body advocating for Auckland Council support for the support of cycling in our city, Bike Auckland requests that you focus on shifting investment away from highway and corridor expansion to projects that create:

- An entire city of low traffic neighbourhoods (LTNs) bounded by

a complete network of safe, separated cycle lanes on the streets (arterials and connectors) that bound the LTNs

- A complete network of walking paths and footpaths, with safe pedestrian crossings at frequent spacing, improved surfaces and lighting, and unimpeded by vehicles and conflicting uses

- An improved network for buses, provided via bus priority at intersections, modal filters, moving bus stops at transfer points closer together, and by implementing bus lanes wherever there is room within the corridor in excess of the above walking, cycling and micromobility networks.

Future Development Plan 2023 #8142

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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?**

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

Tell us why

Other feedback

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

31 July 2023

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

Submission on the draft Future Development Strategy - Euroclass

Introduction

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

Background to Euroclass

Euroclass is an Auckland-based, family-owned and operated, building, property development and investment company. It has been involved in New Zealand's property and construction industry for 40 years, delivering large-scale industrial and mixed-use developments across Auckland and more than 400 design build industrial projects across the country. Euroclass plays a key role in supplying the necessary land building and development to ensure there is adequate employment in the most economic and sustainable locations. The company has been through many economic and political cycles impacting the commercial property industry and continues to hold a long-term view.

Summary of submission

Auckland Council (**Council**) is required to prepare an FDS in accordance with subpart 4 of Part 3 of the National Policy Statement on Urban Development 2020 (**NPSUD**). Euroclass is supportive of the response to growth within Auckland being led by an FDS prepared in accordance with the requirements of the NPSUD. However, Euroclass has significant concerns with the draft FDS as set out in this submission.

Meaningful consultation and engagement

As required by clause 3.15 of the NPSUD, a key part of preparing an FDS is ensuring it is prepared with genuine and meaningful consultation and engagement with the community, infrastructure providers, iwi and hapū, and land owners and developers. As has been the case with preparation of FDSs by other council in New Zealand, this engagement should be broad-based and encourage blue sky thinking, all informed by good quality evidence. Open communication ensures that the process is democratic and recognises that a wide range of parties will need to come together to implement the FDS. A failure to meaningfully consult risks the Council zoning land and/or providing infrastructure in less efficient locations – that outcome would be more expensive overall.

Along with achieving well-functioning urban environments in its existing and future urban areas, ensuring that there is sufficient development capacity for business and housing is a key purpose of an FDS under clause 3.13. Land supply is a central aspect of ensuring sufficient development capacity for industrial land, as it enables opportunities for high-value businesses to grow and employ more people.

Economic development of the region may be constrained if the FDS is not prepared properly, with negative consequences for the New Zealand economy as a whole.

Short-Term infrastructure constraints are driving the Long Term Plan

Overall, it is apparent that short-term infrastructure constraints are driving the long-term strategic plan for Auckland. The short-sightedness of this approach and the lack of any meaningful public discussion is disappointing. We encourage the Council to take a long-term view, over a 30-year horizon as required by the NPSUD. Euroclass accepts that the Council is facing a significant infrastructure deficit and that it needs to look to alternative forms of funding to pay for growth, including higher levels of direct government investment. If the Council and development sector work proactively together and look for opportunities, an appropriately prepared FDS provides the opportunity to negotiate this outcome with the government in a comprehensive way. As it stands, the Council's unilateral approach to planning for growth in Auckland may help to suppress increases in general rates, but it fails to realise the longer-term and wider benefits of growth for the community.

Fundamental issues

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

In particular, Euroclass is concerned that:

- More transparency and rigour is needed around the capacity analysis that underpins the draft FDS to ensure it has been based on feasible and realisable development capacity and not just planned enabled capacity.
- There is already a shortage of industrial land, and Council has rezoned only a very small amount of additional industrial land since the Auckland Unitary Plan (Operative in Part) (*AUP*) was initiated. With the ability for private plan changes being reduced/removed, there is a real risk that the supply of industrial land will completely dry up.
- The Council has not completed its assessment of business demand and capacity and therefore the evidence base for the draft FDS is deficient. Further transparency and rigour is needed in relation to the analysis that has informed the location and sufficiency of business land.
- More detailed spatial analysis is required to build on the work undertaken for the strategic growth scenarios to ensure the draft FDS is sufficiently robust and meets the requirements of the NPSUD. In particular, business demand and development capacity needs to ensure it takes into account the specific location-dependent needs of businesses within sub-regions, rather than on a coarse basis.
- Any roll back or change in sequencing of future urban areas needs to be based on robust evidence informed by spatial analysis and not driven by current infrastructure limitations, particularly in light of opportunities for privately funded upgrades.
- More analysis is required on the affordability impacts constraining greenfield growth.

- There has been limited engagement with the development sector to develop the draft FDS. Furthermore, the rush to adopt the FDS by September 2023 provides limited ability to make meaningful changes in response to feedback received.

These failings have led to substantial flaws in the evidence base upon which the draft FDS has been prepared. The draft FDS has not adequately considered whether land that is plan enabled will translate into actual capacity in terms of being feasible, infrastructure ready and reasonably expected to be realised. Capacity numbers have not incorporated the mandatory competitiveness margin.

The submission below elaborates on these matters.

Demand and capacity analysis

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

In relation to business demand and capacity, the draft FDS is based on initial results from the Council's Business Capacity Assessment which is still in draft form. The draft FDS concludes that there is likely to be sufficient plan enabled business capacity on a region wide basis; however, there will be shortfalls in sub-regions for specific business sectors, particularly land extensive sectors, which is understood to be approximately 1,000 hectares. Given that this assessment is based on plan-enabled capacity and has identified capacity shortfalls for land extensive sectors, this does not appear to meet the NPSUD requirements and is a significant weakness of the draft FDS.

The Council's current Housing Assessment for the Auckland Region was released in July 2021 and is now two years old.[1] The NPSUD at clause 3.19 requires Councils to prepare and make publicly available a Housing and Business Development Capacity Assessment (HBA) every 3 years. Euroclass also understands further work may be required on Council's HBA and the data underpinning it.

Through Euroclass' extensive experience in delivering industrial buildings for businesses in Auckland, it is clear that location is the primary consideration for tenants of new buildings. The location-dependent nature of many businesses means that "availability" of zoned industrial land in a sub-region is not sufficient to meet actual needs. Therefore, development capacity needs to ensure it takes into account the specific location-dependent needs of businesses within sub-regions.

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

[1] Housing Assessment for the Auckland Region, July 2021: https://knowledgeauckland.org.nz/media/2145/housing-assessment-for-the-auckland-region-nps-ud-july-2021.pdf

Growth scenarios for development

Clause 3.14 of the NPSUD requires that the draft FDS is informed by "a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS."[2] Euroclass notes that while four growth scenarios have evaluated different levels of intensification and greenfield growth, this has been undertaken at a regional strategic level, with no understanding of the spatial composition of the different scenarios. In Euroclass's view, this analysis needs to be developed further with more detailed spatial analysis that evaluates:

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

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

- There has been practically no Council-initiated industrial rezoning under the AUP, and the approach to the draft FDS suggests it is unlikely there will be any more. The Natural and Built Environment Bill will significantly reduce the ability to promulgate private plan changes, so a lot will depend on Council strategies such as the FDS. Industrial land is already in short supply, and if future urban zoned land is not live-zoned within the programmed release timeframe, this situation will be exacerbated. As the supply of industrial land dries up, if Council is not rezoning additional land and developers are unable to, there will be enormous negative impacts on the wider industry and the Auckland economy.

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

- Further analysis of greenfield areas not included within the Future Urban zone is required; noting that there may be new opportunities for development beyond those identified over 10 years ago as part of the Auckland Plan and the original Future Urban Land Supply Strategy.[3] Input from the development sector would support this aspect of the scenario development and analysis.

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

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

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2 National Policy Statement on Urban Development, clause 3.14(b).

3 Auckland Future Urban Land Supply Strategy, July 2017: https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/topic-based-plans-strategies/housing-plans/Documents/future-urban-land-supply-strategy.pdf

Greenfield development

The draft FDS is either proposing significant roll back of future urban areas or is significantly pushing out the sequencing for release of future urban zoned land based on current funding limitations. In Euroclass's view this approach is fundamentally flawed. It assumes that infrastructure costs for brownfield intensification are cheaper than greenfield suburban land which is not the case, particularly in urban areas where significant intensification is proposed and where infrastructure is struggling to cope with existing levels of development and recent increase in rainfall and severe weather events. Focussing intensification and growth in these areas will only bring further pressure, and an immediate need to upgrade or replace existing infrastructure.

By severely constraining the land available for development, the draft FDS will increase the cost of commercial and industrial land. This outcome is in direct conflict with the objectives of the NPSUD.

Furthermore, Euroclass is opposed to the identification of "infrastructure triggers" based on the following observations:

- The analysis undertaken to identify the infrastructure upgrades required is likely to have been undertaken at a high level with no further explanation provided as to how the proposed triggers have been identified.
- The actual infrastructure requirements will vary depending on factors including the nature of the development, infrastructure solutions proposed, and the status of development on neighbouring sites.
- Over time, infrastructure requirements and solutions are likely to change.

A further issue is Council assumptions regarding infrastructure costs for development in greenfield areas. The scoping of future infrastructure projects is often over-designed or engineered to support business case and approvals processes rather than considering practical requirements including the key elements needed to provide for capacity and safety and the staged nature of growth. Additionally, to the extent information can be sourced from information published by Council, future costing of works frequently involves over-inflated budgets.

In Euroclass's view the current infrastructure limitations should not be driving land use decisions. Instead, a long-term holistic approach is needed which:

- Identifies enough land for growth in the right locations where it can be delivered efficiently.
- Identifies what infrastructure is needed to support all future development (not just greenfield), and roughly how much will it cost, focusing on the next 10 years.
- If there is a funding gap, think creatively to find solutions, working in partnership with government and the private sector. For example, rezoning ahead of infrastructure (an approach which the draft FDS criticises and seeks to reduce or remove) can be beneficial to the Council as the responsibility to fund and construct infrastructure can be passed to developers and landowners if they want to develop out of sequence. In Euroclass's view, it is better to retain this as a potential option than to slavishly adhere to a predetermined sequence of land release which may not respond to market.

Another key factor that is driving the proposed roll back of future urban areas is the need to reduce carbon emissions. The emissions assessment that has been used to inform the proposal has been undertaken at a strategic regional scale and we understand it is focussed on transport modelling focussed on vehicle kilometres travelled (VKT). The performance of different future urban zoned areas however, will depend on land use mix, design and the sizing of the existing bulk infrastructure developed to date. A more detailed analysis is required of the areas proposed to be rolled back to ensure robust and evidence-based decision making. Furthermore, VKT is not necessarily a reliable indicator of greenhouse gas emissions. It does not take into account traffic congestion, effects of low traffic speed, or changes to vehicle efficiency with the increase in number of electric vehicles.

Process issues

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

The NPSUD requires that the FDS is completed in time to inform the 2024 Long Term Plan.[4] This does place a constraint on the Council for completing the draft FDS; however, given the concerns expressed above, there are a range of options that the Council could implement that would provide sufficient time to complete a legally compliant and robust FDS for Auckland that meets the Council's other obligations.

These options include:

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

Relief sought

The following amendments are sought to ensure that the FDS achieves a well-functioning urban environment and provides for sufficient development capacity:

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

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

[4] National Policy Statement on Urban Development, clause 3.12(1)(b).

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

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

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

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

Euroclass requests and recommends that Council delay the adoption of the FDS to enable meaningful engagement with the community and development sector and to address the matters above. It is neither efficient nor appropriate to rush to finalise the FDS in light of the current pause on the Intensification Planning Instrument (Plan Change 78) process and the uncertainty around it given the upcoming election, as well as the status of some of the documents underpinning the FDS process (such as the HBA, referenced above).

Decision sought and hearing

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

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

[redacted]

[redacted]

Date: 31 July 2023
(Person authorised to sign on behalf of submitter)

[redacted]

Future Development Plan 2023 #8146

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

Your feedback

Focusing growth

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

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

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

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

Other

Tell us why

Auckland needs to be able to grow up and out. Preventing outward growth forces land prices to be higher across the entire urban gradient.

Accessible local centres

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

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

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

Other

Tell us why

Allow development to happen wherever a development can cover, over time, the associated infrastructure costs. Growth would likely be near those local centres in that case, but the more liberal approach to zoning would enable more competitive urban land markets and more affordable housing.

Avoiding hazards

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

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

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

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

Other

Tell us why

Rather than explicitly constrain growth in hazardous places, require risk disclosure and require that development in risky places covers the higher associated infrastructure cost.

Resilient infrastructure

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

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

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

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

Other

Tell us why

If this approach makes sense, it will show up as such on a standard cost-benefit assessment. And it very often likely will pass muster! But don't require it in places where it does not.

Other feedback

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

Our full submission is attached.

#8146

Submission

by

THE NEW ZEALAND INITIATIVE

to Auckland Council

on

the Draft Future Development Strategy

31 July 2023

Prepared by:
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1 INTRODUCTION AND SUMMARY

1.1 This submission in response to Auckland's Future Development Strategy[i] is made by The New Zealand Initiative (the **Initiative**), a Wellington-based think tank supported primarily by major New Zealand businesses. In combination, our members employ more than 150,000 people.

1.2 The Initiative undertakes research that contributes to the development of sound public policies in New Zealand and the creation of a competitive, open and dynamic economy and a free, prosperous, fair and cohesive society.

1.3 The Initiative's members span the breadth of the New Zealand economy; a well-functioning Auckland is important to them. The views expressed in this submission are the views of the author, not those of our members.

1.4 We do not aim to comment on all aspects of this document. We focus on the areas within our policy expertise.

1.5 In summary, we submit:

(a) The Strategy's restrictions on development will worsen housing shortages and housing affordability;

(b) Council must fundamentally reconsider how it thinks about carbon emissions. Urban emissions are covered by the Emissions Trading Scheme. Council action in seeking to limit local emissions may have no effect at all on national-level emissions. But Council has a critical role in facilitating its residents' responses to rising carbon prices in the Emissions Trading Scheme;

(c) Council should rely more strongly on signals provided by land prices in determining whether its plans have been sufficiently enabling;

(d) Council should take up opportunities for better funding and financing of the infrastructure necessary to support urban growth, rather than constrain urban growth to meet Council's perceived balance sheet limitations. Crown Infrastructure Partners is working to make the Infrastructure Funding and Financing Act more easily available for smaller projects;

(e) Designating urban growth corridors early, through use of option contracting, and exercising those options as needed, as discussed by the Infrastructure Commission, would bring down the cost of infrastructure over the longer term.

2 PRINCIPLES FOR GROWTH AND CHANGE. PRINCIPLE 1: SUPPORT GREENHOUSE GAS EMISSION REDUCTION

2.1 There is critically important work for Council to be doing as part of the country's transition towards net zero. Unfortunately, the strategy as outlined at a high level fails to address the issues that Council needs to be thinking about, while proposing measures that will not contribute toward net zero.

2.2 Barring trivial levels of emissions from livestock, all urban emissions are covered by the Emissions Trading Scheme. National-level net emissions are driven by the number of ETS credits issued by central government, plus any accumulated stockpiles of ETS credits.

2.3 It is difficult to think of any substantial urban emissions that are not covered by the ETS. Domestic transport is entirely covered by the ETS. Construction is covered by the ETS. Heating and process heat are covered by the ETS. Every tonne of emissions in the covered sector requires the surrender of a New Zealand Unit (NZU) to cover those emissions. In the

case of transport, fuel companies purchase and surrender ETS credits on behalf of later fuel users.

2.4 The ETS matters substantially for any Council-led efforts to reduce emissions within the city. If emissions from the city doubled, or halved, or quadrupled, or disappeared entirely, national-level net emissions would be entirely unchanged unless central government reduced the number of ETS credits that it releases each year.

2.5 If central government does not reduce the number of ETS credits that it issues, the only effect of reduced emissions in the Auckland region is a shift in the location of emitting activities. Every credit that is not purchased by an Auckland business or on behalf of an Auckland resident will be purchased instead by someone else.

2.6 Determining the cost-per-tonne of emission reductions matters. If a Council initiative would cost $700 per tonne of net emission reductions, and the current carbon price is $70 per NZU, Council could instead choose to buy and retire ten tonnes worth of ETS credits for the same cost to the community – and do ten times as much good in reducing net emissions.

2.7 Even if central government decided to reduce the number of carbon credits it issues in response to reductions in emissions in Auckland, carbon initiatives in Auckland would still do only a fraction as much good as simply buying ETS credits and retiring them, unused.

2.8 It is unlikely that Council will find areas where it can deliver net emission reductions for less than the going carbon price. But there are areas where Council will be critically important in enabling residents and businesses to respond to rising carbon prices.

2.9 Rising carbon prices will affect where people want to live, where businesses wish to locate, patterns of working from home versus commuting, preferred transport mode, type of desired housing and more. Council zoning needs to be flexible to enable changes in site use as resident and business needs change. Transport planning has to incorporate the likely effects of rising carbon prices.

2.10 To put it bluntly, the strategy ignores the key area where Council can really help enable residents to adapt to rising carbon prices, while pursuing initiatives that cannot reduce net emissions because of their intersection with the ETS.

2.11 In 2021, the Urban Land Markets Group, a broad set of urban-oriented economists and analysts brought together by Associate Minister Twyford to provide an independent stream of advice on housing policy, prepared a submission to the Ministry for the Environment on the Emissions Reduction Plan and its implications for urban policy. That submission is attached to this submission. It argued that councils have a key role to play in ensuring that zoning and transport infrastructure can enable the ways that people will want to live, move, and work as carbon prices rise. Councils could also very usefully work in mitigating additional market failures that may become apparent as carbon prices rise, if such interventions pass cost-benefit assessment. However, councils attempting to directly target emissions within the sectors covered by the ETS would be unlikely to reduce net emissions. It also warned central government that councils could use carbon emissions as a new tool for frustrating the government's urban growth agenda, and that central government should be vigilant in guarding against this.

2.12 We consequently strongly endorse the Future Development Strategy's suggestion of liberal mixed-use zoning (implicit in Principle 1(b) and Principle 1(c)) but urge reconsideration of Principle 1(a). Allowing intensification is important, including removing character designations that restrict building in places where people want to live. But allowing further urban expansion is critically important.

2.13 Work by the Urban Land Markets Group[ii], drawing on work by Treasury and further developed at Treasury, demonstrated how restrictions at a city's fringe push up land prices across the entire city.

2.14 When a developer can add infrastructure to a paddock and easily create a new subdivision, that subdivision competes with downtown apartments for residents. But rather than causing any large outflow to the suburbs, the process instead brings down land prices downtown. Downtown land is forced to compete for new development and for new residents with land at the edges of town.

2.15 An example may help illustrate. Imagine that a car company comes up with a new model that costs 75% less than other new cars, with similar quality. That car's entry into the market would bring down the cost of used cars across the entire market, because used cars would have to compete with that new model. Even if few of those cars were purchased, the effect would hold. But if government decided later to ban that new car, prices of used cars would rise over time – because that competitive pressure had been removed. Auckland's ban on new subdivisions has similar effect.

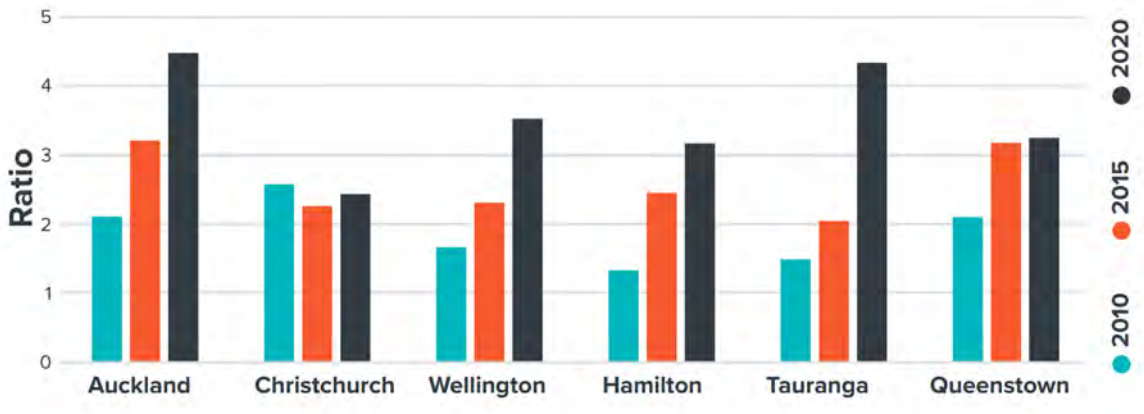
2.16 Allowing paddocks to turn into subdivisions, while requiring that those developments cover the cost of their infrastructure over time, helps bring down land prices across the entire urban area. But the presumption against expansion in the Future Development Strategy effectively bans private plan changes.

2.17 The Infrastructure Commission this year demonstrated that zoning restrictions at Auckland's fringes add over $1200 per square metre to the cost of land at Auckland's fringes, or about $630,000 for a 500 square metre section – over and above the cost of making rural land ready for urban use.[iii]

2.18 In 2020, land just inside Auckland's urban boundary cost over four times as much as land just outside that boundary. That differential doubled in the decade since 2010. See Figure 2 from the Infrastructure Commission's report, reproduced below.

Figure 2: The rise of urban land values... but not everywhere

Ratio of land values inside the urban boundary relative to outside the boundary



2.19 Carbon prices will be much higher over coming decades. Council has to plan for a future in which residents will face higher carbon prices. But that is not a reason to restrict urban expansion at the city's fringes. The carbon costs of suburban living will be passed along to those deciding to live there, because urban emissions are covered by the Emissions Trading

Scheme. They will consider those costs in deciding where to live, and developers respond to expected demand for housing when deciding where to build.

2.20 High carbon prices may mean fewer people will want to live farther out. Or they may choose electric vehicles or prefer public transit. Suburban choices can be consistent with a higher carbon cost world. But banning suburban expansion will constrain choices while increasing land prices across the entire city. Downtown apartments will be less affordable because of restrictions on building at the city's fringes.

2.21 Liberal mixed-use zoning across the entire city, and at city fringes, provides the most flexibility for dealing with rising carbon prices while doing the least harm. And especially where congestion charging is soon to be implemented.

2.22 We note that Objective 2 of the National Policy Statement on Urban Development states that "Planning decisions improve housing affordability by supporting competitive land and development markets". Policy 1 of NPS-UD urges that "Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: (a)(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets." Auckland's proposed Future Development Strategy runs contrary to both.

3 PRINCIPLE 2: ADAPT TO THE IMPACTS OF CLIMATE CHANGE

3.1 The Strategy suggests avoiding growth in riskier areas while promoting infrastructure resilient against more frequent flooding.

3.2 Broad, liberal, mixed-use zoning across as much of the city as possible will naturally reduce demand for living in riskier places. People are pushed into riskier places when development is too constrained in safer places, all else equal. Viewshafts and special character areas that inhibit development in Auckland's safer neighbourhoods also make it harder for Auckland to adapt to climate risk. The same will hold true for development at city fringes.

3.3 Rather than ban building in riskier places, council could allow it under condition that buyers are well-advised of the risks and that those communities are required to cover the higher infrastructure costs associated with living in those areas. It is unlikely that many would wish to take on those costs, but it is difficult to predict. Allowing people to make those choices, at their own risk and expense, provides greater flexibility.

4 PRINCIPLE 3: MAKE EFFICIENT AND EQUITABLE INFRASTRUCTURE DEVELOPMENTS; PRINCIPLE 5: ENABLE SUFFICIENT CAPACITY FOR GROWTH IN THE RIGHT PLACE AND AT THE RIGHT TIME

4.1 Auckland's housing affordability is amongst the worst in the world. Most international measures suggest housing is affordable when the median house price is about three times the median household income. In Auckland, that multiple is now close to ten – with median house prices of about a million dollars and median household incomes of around $100,000. It is cold comfort that the recent house price slump means the multiple is down from over 11. In 2010, it was only a little over six.

4.2 The high cost of housing is one of Auckland City's worst problems. It is a major contributor to poverty. It accentuates the cost-of-living crisis. It acts as a handbrake on labour mobility, locking workers out of comparatively high-income urban areas. It contributes to shortages of teachers and nurses, who often cannot afford to live near the schools and hospitals that need them. And it fuels an inter-generational divide.

4.3 Against this background, a draft Future Development Strategy that tightens restrictions on growth on the city's fringes is the opposite approach to the one the Council should be taking to address arguably the city's worst public policy problem.

4.4 The Strategy expressly states, "There will be less reliance on expansion into future urban areas, and what growth there is will be phased over a longer timeframe."

4.5 But land for urban development at the city's fringes is already in scarce supply. So much so that this has resulted in the price differentials between land either side of the rural urban boundary noted above.

4.6 Aucklanders will never have affordable housing if the cost of land on the city's fringes is artificially inflated by planning restrictions. That is because the scarcity of rural land for housing does not simply affect the cost of housing on the city's fringes. And, as noted in paragraph 2.13 above, the price of sections at the fringes constrains property prices across the city.

4.7 Consequently, Auckland Council's proposals to constrain urban growth will prop up property prices city-wide.

4.8 The FDS seeks to ensure most efficient use of infrastructure. For existing infrastructure like roads, congestion charging aimed at maximising traffic throughput will mean existing infrastructure is more efficiently used. It will also mean that new suburban developments internalise a potential external cost of suburban expansion.

4.9 Constraining development to ensure rapid uptake of new infrastructure necessarily means pushing up land prices at the expense of housing affordability. It is better, and more equitable, to charge the beneficiaries of infrastructure for its cost over the life of the infrastructure – partnering with Crown Infrastructure Partners to use IFF combined with special ratings areas for larger infrastructure. Doing so spreads the cost of infrastructure across its users over time, rather than across users and non-users spatially. It also helps remove bottlenecks that constrain against development and that inflate the cost of land zoned for current housing development.

4.10 Drip-feeding land for development almost guarantees inflated land prices. Making land available early, so long as developments can cover the resulting infrastructure costs, is more consistent with the urban growth agenda and the principles of the National Policy Statement on Urban Development.

4.11 Trying to force a city's development timing to meet the city's balance sheet constraints on infrastructure is worse than using special purpose financing vehicles to enable organic city growth wherever the costs of the necessary infrastructure can be supported by its users over time.

4.12 Mixed-use zoning provides flexibility in response to changing demand for commercial and residential spaces.

4.13 Rather than plan where and when development will be allowed to happen, Council should focus on securing options for the transport and infrastructure corridors necessary for supporting growth. Early purchase of options for corridors can substantially reduce the cost of later land acquisition. And enabling optioned corridors to be developed whenever there is sufficient demand from developers to cover infrastructure development costs means the city would be responsive to population and demand changes.

5 CONCLUSION

5.1 Auckland's Draft Future Development Strategy too sharply constrains urban growth, both upwards and outwards. Rather than take a prescriptive view about what development

should be allowed where and when, it should be prepared to facilitate and encourage growth whenever new developments, whether they be apartment towers or subdivisions, can cover their own costs over time.

5.2 Continuing to use infrastructure constraints as reason to constrain growth, when better funding and financing options are available, and continuing to use character and viewshaft restrictions as a way of preventing development in places where people want to live, invites central government to set an Urban Development Authority that would override the City's plans. Central government would be right to do so, if this plan is not amended to enable urban growth and more affordable housing markets.

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[i] Auckland Council. 2023. *Draft Future Development Strategy.* Available at https://akhaveyoursay.aucklandcouncil.govt.nz/future-development-strategy

[ii] Blaschke, B. et al. 2021. "A new approach to urban planning." Available at https://cdn.auckland.ac.nz/assets/business/about/our-research/research-institutes-and-centres/Economic-Policy-Centre--EPC-/USEPP002.pdf

[iii] Infrastructure Commission. 2023. "Urban land prices – a progress report." Available at https://www.tewaihanga.govt.nz/assets/Uploads/Urban-land-prices.pdf

#8146

Submission

to

the Ministry for the Environment

on the

Emissions Reduction Plan

24 November 2021

Prepared by members of the Urban Land Markets Group

Group members are providing advice for the public good and are not necessarily reflecting the views of their respective organisations. The advice is a collaborative effort, so individuals do not necessarily endorse every element in the advice.

INTRODUCTION AND SUMMARY

0.1 This submission on the Ministry for the Environment's *Emissions Reduction Plan* [the Plan] is made by members of the Urban Land Markets Group, an informal working group established by Associate Minister Twyford and authorised by Minister Parker to provide an independent stream of policy advice on housing and competitive urban land markets.

0.2 The Group aims to ensure policy and regulatory settings are consistent with achieving housing affordability. It has produced two working papers providing advice on competitive urban land markets and on complementary measures in infrastructure funding and financing to enable more housing development.

0.3 Members of the Group are concerned about unintended consequences of the Plan for housing supply and for housing affordability. When considering matters of urban form, urban design, and building standards, aspects of the Plan risk working at cross purposes to the government's urban growth agenda while potentially achieving little reduction in net national emissions.

0.4 The Group acknowledges circumstances whereby coordinated regulatory and investment initiatives can reduce net emissions by more than would be possible solely through the ETS.

0.5 Market failures may hinder appropriate responses to rising carbon prices, making adjustment unduly costly. Policies remedying those failures can make the ETS more effective, reducing the overall cost of reaching net zero. Such measures should be supported by appropriate cost-effectiveness evaluation.

0.6 If political constraints mean the ETS cap can only be reduced to the level the electorate can bear, rather than the level consistent with a durable path to net zero, additional policies that ease the political constraint and enable greater emission reductions may be warranted. This can be welfare enhancing if the initiatives are cost-effective relative to the best-available alternative options. However, demonstrating cost-effectiveness requires knowing what the optimum price would be if the government set the optimal cap — and this is unknown, and there is no process to discover it. This means in practice relatively prescriptive guidance is required for cost-effectiveness assessments.

0.7 Several central government initiatives are already underway that have consequential effects on urban emissions. These include:

(i) The RMA 1991's National Policy Statement on Urban Development;

(ii) the Enabling Housing Supply Bill currently before Parliament;

(iii) the Government Policy Statement on Housing and Urban Development;

(iv) the Government Policy Statement on Land Transport;

(v) plans for congestion charging and transport charging more generally; and,

(vi) the declining cap on net emissions provided by the Emissions Trading Scheme, which covers all consequential urban greenhouse gas emissions.

0.8 Unless they address other demonstrable market failures or ease local regulatory constraints against adopting lower carbon options, it is unlikely individual local government urban planning initiatives can have substantial cost-effective effects on net national emissions, when the existing suite of policy initiatives already in progress is considered. However, coordinated action across all councils, perhaps through the Plan may reduce national emissions, if political constraints have prevented further reductions in the ETS cap. But the issue is determining the

cost effectiveness of such collective initiatives. Other options may more effectively address the political constraints.

0.9 In our view, councils have used their zoning and consenting powers to protect their balance sheets against the costs that they believe is consequent to urban growth. Those incentives led to zoning and consenting decisions that have stymied urban intensification and housing development.

0.10 The government's housing supply agenda has worked to prevent councils from using zoning and consenting to stymie housing development. These measures will enable more intensive urban form by making it harder for council to use zoning and consenting to block new housing development.

0.11 Measures recommended by the Plan would provide councils with new tools capable of frustrating development and could undermine the government's objectives in housing supply.

0.12 Further, there are trade-offs between policy responses for emissions reductions compared to responses for climate adaptation. For instance, more dense and centralised urban form may reduce emissions from utility networks, but may increase exposure to risk by 'placing more eggs in one basket' when major storm events occur that cause network outages.

0.13 We urge the Ministry to consider very carefully the place of urban planning in the Emissions Reduction Plan. Measures already underway will work to reduce urban emissions and will have substantial effects on urban form. Asking councils to consider emission reductions explicitly in planning and consenting, over and above the consideration already given to those emissions in measures already underway, with insufficient guidance puts the housing supply agenda at risk for little potential greenhouse gas abatement.

1. Urban emissions and the current policy environment

1.1 When councils believe they face substantial costs in accommodating urban growth, they use zoning and consenting powers to protect their balance sheets. Over decades, these restrictions have had substantial effects on urban form, housing supply, and housing affordability. They prevent intensive development in places where infrastructure costs may be higher, while also restricting development at city fringes.

1.2 We have inherited urban transport infrastructure set in an environment where congestion was not priced and carbon emissions neither priced nor considered. This created a bias toward higher-emitting urban forms than is desirable to help today's climate change objectives.

1.3 The policy environment has substantially changed for the better. Past patterns of urban development will provide a poor predictor of future urban form.

1.4 Since 2020, the Emissions Trading Scheme has had a binding cap on net emissions, with a sinking-lid policy soon set to take effect. The ETS provides a price on carbon, making emissions more costly. All substantial urban emissions are covered by the ETS. Rising ETS prices, and expectations of rising ETS prices, will affect decisions made by households, firms, and councils, where they are allowed to do so.

1.5 Where council zoning and consenting practices have imposed undue restrictions on urban intensification, the Government's housing supply agenda works to enable more intensive urban forms. For example:

1.5.1 The National Policy Statement on Urban Development enables substantial increases in density in places near transit nodes. More people will live in places well-served by lower-emission options. This will have effects on urban emissions. It also requires the

removal of minimum parking requirements from urban environments, which will indirectly enable higher density and support lower transport emissions.

1.5.2 The Enabling Housing Supply Bill, currently under consideration by Parliament, will require councils to allow far more housing. Development of up to three houses of up to three stories each will be allowed in most places in Tier 1 urban centres. While the Bill provides for a relatively modest increase in density, the large size of the area affected means the Enabling Housing Supply Bill has the potential to significantly increase housing supply. The effect of the change should be largest on underdeveloped lots in locations where people wish to live. This Bill enables more intensive urban forms, while leveraging existing polycentric city modes. Councils will wish to enable greater public transit options between those urban centres.

1.5.3 Other central government initiatives, including the Government Policy Statement on Housing and Urban Development, and the Government Policy Statement on Land Transport, also work to reduce urban greenhouse gas emissions. The GPS-HUD aims to make lower-carbon housing options simpler, while the GPS on Land Transport 2021 aims to support a rapid transition to lower carbon transport systems.

1.5.4 Plans for congestion charging and transport charging more generally will also substantially affect urban form over the longer term by internalising costs. Public transit options and housing closer to amenities and closer to employment will become relatively more attractive as a consequence. Councils working to meet resident demand for services will seek to accommodate that increase in demand for public transit. And central government initiatives already described will enable a more flexible housing supply response to those changes in demand.

1.6 Additional transport and land use policy measures could be undertaken that would enable councils to respond more quickly to the changed policy environment, improve urban form, and make it easier for households and businesses to have a lower carbon footprint. We addressed some of these issues in the Group's first paper on urban land markets.

1.6.1 Flexible zoning options make it easier for households and businesses to make locational choices that best respond to rising carbon prices and to congestion charges. Current policy can make it challenging for people to relocate closer to work or education, though the NPS-UD and the Enabling Housing Supply legislation will ease that constraint. Flexible mixed-use zoning options could further assist.

1.6.2 Policy could also support the establishment of transport corridors that enable the efficient provision of public transport and active mode options. Transport corridor designations then further the government's housing supply agenda while enabling lower carbon footprints.

1.7 The Group's first paper also warned that achieving better urban form outcomes does not require a restriction on the location of development. It noted that a well-designed mixed-use transit-oriented development 3km outside the existing urban edge will generate fewer car trips than a poorly-designed infill development 3km inside the urban edge. Further, the first paper noted that enabling development at a city's fringes anchors land prices throughout the urban area, making housing more affordable everywhere – including in the city centre.

1.8 The Group's first paper urged that urban policies be aimed at making it easier to choose home locations, work locations, and travel behaviours that require less vehicle travel and vehicle emissions, which would in turn reduce the cost of abating emissions within the ETS. This requires zoning flexible enough to accommodate changes in complex locational preferences.

1.9 Moving beyond those measures to explicitly target carbon emissions in urban planning, over and above measures already underway, brings considerable risks. While it is always possible that careful urban planning will address market failures not already covered by the ETS or already addressed by other central government initiatives, it is also possible that planning options encouraged by the Plan will be used for other purposes.

1.10 A broad remit to consider emissions reduction in urban planning risks providing councils with new tools to obstruct new housing development. Councils could justify restrictive planning and consenting practices on carbon-mitigation grounds, notwithstanding a lack of compelling evidence for such restrictions. Where the incentives facing councils still lead them to oppose urban growth, providing new tools to stymie housing development has risks. This therefore means that tight guidance and direction is needed for any initiatives that aim to do more than simply respond to existing and expected ETS prices.

2 New tools for protecting the council balance sheet

2.1 In our view, councils have historically used restrictive zoning and consenting measures to protect their balance sheets against the perceived costs of urban growth. The Government's urban growth agenda prevents councils using some tools in overly restrictive ways. For example, the NPS-UD requires that more intensive land uses be allowed near transport nodes, and the Enabling Housing Supply legislation would allow slightly more intensive land use more generally.

2.2 Where the incentives facing councils to restrict growth have not yet been substantially affected, providing new tools that enable restrictions on urban development, even if they are nominally intended to reduce urban greenhouse gas emissions, could threaten the government's housing supply agenda.

2.3 The Plan suggests measures including reduced fossil gas use in buildings, capping the emissions from buildings, investigating and potentially implementing a range of actions to lower emissions from buildings, reducing construction waste, reducing organic waste to landfill, implementing mode-shift transport plans, reducing vehicle-kilometres travelled and more.

2.4 The Plan also suggests that "rapid outward growth has led to poorly functioning urban form and higher emissions", and that strategic planning emphasising medium- and high-density development can mitigate emissions. The group notes that outward growth has not been "rapid". Built-up areas (settlements) increased from about 167,000 hectares in 1996 to 196,000 in 2018, which is only 0.73% per annum compound growth, relative to population growth rate of about 1.5% per annum.

2.5 Many of the Plan's measures could be warranted in particular circumstances. But they risk being used by councils to restrict development in places where councils are otherwise constrained against blocking new housing development by the NPS-UD and by the Enabling Housing Supply legislation.

2.5.1 We have already seen objections to the Enabling Housing Supply legislation based on potential construction waste.

2.5.2 Councils could use tight building emission standards not to reduce net emissions, but to increase the costs of development in places where council wishes to restrict development.

2.5.3 Good transport planning can reduce vehicle-kilometres travelled. While it is true that dense cities have lower per-person carbon footprints, suburban development – when

Future Development Plan 2023 #8148

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?

I don't know

Tell us why

We find there is comprehensive planning for the urban areas, but very little information about how the rural area will be adequately planned for given the rate of regulatory change that is happening. Our submission discussed this in more detail.

Accessible local centres

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

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

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

Agree

Tell us why

It makes economic sense to focus development near local centres. However, we would like to see better recognition and planning for the role of rural centres supporting the rural communities. More is discussed in our submission.

Avoiding hazards

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

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

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

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

Agree

Tell us why

Areas with more significant natural hazard risk may not be appropriate for housing development, but could be utilised for other uses.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Other feedback

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

We are concerned that there is not a good understanding of the pressures that will affect the rural areas of Auckland. This starts with a comprehensive understanding of the regulatory and legislative changes that will impact how the rural areas will be productive. We believe reverse sensitivity needs to be managed, as does the type of development occurring at the boundaries between urban and rural areas. We are really happy to work with Auckland Council to better understand the

#8148

SUBMISSION ON

Auckland Council Future Development Strategy

31 July 2023

To: Auckland Council
Name of Submitter: Horticulture New Zealand

Contact for Service:
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Horticulture™ New Zealand
Ahumāra Kai Aotearoa

OVERVIEW

#8148

Submission structure

1. **Part 1**: HortNZ's Role
2. **Part 2**: Executive Summary
3. **Part 3**: Submission

Our submission

Horticulture New Zealand (HortNZ) thanks Auckland Council for the opportunity to submit on the Future Development Strategy and welcomes any opportunity to continue to work with Auckland Council and to discuss our submission.

HortNZ could not gain an advantage in trade competition through this submission.

HortNZ wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

#8148

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit, and vegetables. The horticultural sector provides over 40,000 jobs.

There is approximately, 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



Export
Fruit $4.04bn
Vegetables $0.64bn

Domestic
Fruit $0.93bn
Vegetables $1.34bn

Industry value $6.95bn
Total exports $4.68bn
Total domestic $2.27bn

HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.



PART 2

#8148

Executive Summary

Our submission covers

- The Future Development Strategy (FDS) has a significant focus and detail on managing urban growth in the centres of Auckland
- HortNZ believes the FDS does not provide enough detail or focus on how the rural production areas, including the SVGA, will be able to be productive given the significant regulatory change facing the rural sector
- HortNZ recommends layering the impending regulatory changes to provide a clearer understanding of the changes that will affect the rural sectors. In addition, we believe these need to be used as a basis for a FDS to consider the rural production areas
- Incorporating a rural perspective into the principles will help provide a platform for how the rural production areas will be better catered for in the FDS.
- HortNZ welcomes the opportunity to work with Auckland Council on developing the FDS in a way that the rural area is considered, and planned for.

PART 3

#8148

Submission

1. Horticulture in Auckland

The Auckland region is an important part of the national food production system. Of significance there is the Specified Vegetable Growing Area (SVGA) of Pukekohe which plays a critical role in the domestic supply of vegetables to support the population of New Zealand[1].

There is approximately 9400ha of horticultural land in the region, of this 7933ha is in commercial vegetable production. In addition, there is 1378m2 of indoor greenhouse production[2]. There is a large degree of diversity in crops produced, with horticultural operations producing potatoes, broccoli, lettuce, onions, peas, silverbeet, carrots, cauliflower, cabbage, pumpkin, avocados, berryfruits and kiwifruit.

There is a large amount of cross-boundary interactions with the Waikato Region where many Pukekohe based vegetable growers have some of their operations located.

2. National issues and the Auckland productive region's role

2.1. Food security

Paris Agreement speaks to a 'fundamental priority of safeguarding food security' and action in a manner that does not threaten food production. Food security is a nationally important issue which needs to be addressed at a strategic level. We have a national food producing system that relies on growing vegetables and fruit in pockets of highly productive land (HPL), with good climate and access to freshwater.

The Auckland region plays a critical role in the national domestic supply of fruit and vegetables. The Pukekohe area in particular is recognised for its productive capacity. The unique soils and climate provide an idea climate for year-round growing. Māori have had a long history of cultivation, with Pukekohe recognised as a key productive area that supported a robust economy with crops being traded with other communities outside the region[3]. Auckland still maintains a high degree of crop diversity with a climate that is ideal for growing a wide range of horticultural crops[4].

The price of NZ grown fresh fruit and vegetables has been steadily increasing prior to these weather events[5]. This can be attributed to labour shortages,

[1] Map of the Pukekohe Specified Vegetable Growing Area | Ministry for the Environment
[2] freshfacts-2021.pdf
[3] Heritage resources: Heritage (doc.govt.nz)
[4] Auckland ClimateWEB.pdf (niwa.co.nz)
[5] Fruit and vegetables drive up annual food prices | Stats NZ

increased costs in compliance, increased costs of horticultural supplies as well as freight and energy costs[6]. The increase of energy costs directly impacts the cost of production in New Zealand of fresh produce. Consumers are price driven, and the consequence of high production costs of New Zealand produce, is that retailers will look to importing produce, or substitutes to meet consumer expectations of price. Importing fresh fruit and vegetables produced in other countries that can otherwise be grown in New Zealand increases carbon leakage due to freight and supports less climate-friendly growing and environmental practices in other countries.

2.1.1. WEATHER EVENTS AND THE IMPACT ON DOMESTIC FOOD SUPPLY

Vulnerabilities in our domestic food supply network have been highlighted during recent weather events with availability of fresh New Zealand grown produced being impacted by the recent rain events[7], and Cyclone Gabrielle causing damage to key horticultural growing areas such as Pukekohe, Northland, and The East Coast regions of Gisborne and Hawkes Bay[8].

The timing of these events has also increased the scale of impact, as many seasonal crops were in their harvest period. Considerable investment into growing the crop has been lost, along with the product and flow on impacts to employment, health and safety.

The recovery in some areas from these events is likely to be long, and the ongoing supply of fresh fruit and vegetables vulnerable during this recovery. Covered crops as pointed out above, aren't exposed to the same vulnerabilities, so while they require a certain level of carbon in their production, they provide a more secure growing environment which is less likely to be disrupted due to extreme weather events.

2.2. Regulatory change

There is a significant amount of regulatory change affecting the rural community in progress. Some of which Councils have obligations and responsibilities to, and others may be out of a local authority's direct scope, but it is important to be aware of.

While the FDS has provided clarity in terms of a boundary line between urban growth boundaries and rural production activities, it has not captured or reflected the impending regulatory changes and how this will impact on the rural production areas.

HortNZ believes it is necessary to layer all the changes in regulation to get a better understanding of the regulatory and operational landscape growers and the rural community will be working under. The key challenge is how do you ensure primary production is enabled and provided for in the FDS when considering the changing regulatory landscape.

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[6] Food prices are up, but the cost to grow it has skyrocketed | Stuff.co.nz
[7] Auckland storm event 9 May 2023 rapid analysis (knowledgeauckland.org.nz)
[8] Cyclone Gabrielle's impact on the New Zealand economy and exports - March 2023 | New Zealand Ministry of Foreign Affairs and Trade (mfat.govt.nz)

2.2.1. NATIONAL POLICY STATEMENT FOR HIGHLY PRODUCTIVE LAND

The National Policy Statement for Highly Productive Land (NPS HPL) came into effect October 2022. HortNZ notes that at the rural Advisory Panel meeting 23 June 2023, Auckland Council provided an overview of the NOS HPL, how it is being used in plan change consent decisions and the requirements of Auckland Council.

The NPS HPL is a blunt tool to manage appropriate use of land deemed highly productive (LUC 1, 2 & 3[9]). Primarily through requirement of Councils to map and zone highly productive land, and manage the subdivision, use and development of this land.

The NPS HPL however does pose some questions about certain types of primary production and where to locate these. Intensive primary production activities such as soil-less production of greenhouse crops do not meet the requirements of the NSHPL in its current form. The NPS HPL says these cannot be located on LUC 1, 2 or 3 land, however the guidance say activities such as these must be planned and provided for[10][11].

The complexity for a greenhouse operation is that it requires access to the same markets, transport route and horticultural support services as a traditional soil-based operation.

Growers planning for the future may look to incorporate greater levels of environmental protection into their operation to provide support and protection of crops from weather events. This may be in the form of covered crop protection structures or investment into complete environmentally controlled greenhouse operations[12]. There is likely to be a challenge to the traditional approach to horticulture with growers incorporating greater levels of technology and automation into their operations to support better environmental practice and crop production.

2.2.2. NPSFM 2020

Implementation of the NPSFM 2020 will be addressed through changes to the Auckland Unitary Plan[13]. However these changes will have an impact on water use, access and prioritisation for growers.

Current engagement is happening with some parts of the community. Consultation is an important aspect of the NPSFM process and incorporating community views into planning. However, this also provides a great deal of uncertainty to those in the rural community as until decisions are made and finalised, the future of freshwater access and use is unclear.

2.2.3. FRESHWATER FARM PLANS

[9] National Policy Statement for Highly Productive Land | Ministry for the Environment
[10] National-Policy-Statement-Highly-Productive-Land-Guide-to-implementation-March-2023.pdf (environment.govt.nz)
[11] National-Policy-Statement-Highly-Productive-Land-Guide-to-implementation-March-2023.pdf (environment.govt.nz)
[12] LeaderBrand | Grow Regions
[13] National Policy Statement for Freshwater Management implementation timeline (aucklandcouncil.govt.nz)

Freshwater farm plans are part of the Essential Freshwater package introduced in 2020. This suite of freshwater changes is aimed at addressing water quality and putting the health of waterbodies at the forefront of planning[14]. All horticultural operations of 5ha or more will be required to have a Freshwater Farm Plan in place. Different regions have different roll out dates, with every region in New Zealand having a rollout date before the end of 2025.

Horticulture New Zealand and NZ GAP are working with growers, central government and regulators to help our growers on their Freshwater Farm Plan journey.

3. Draft Future Development Strategy

The Future Development Strategy (FDS) provides some useful references to horticulture, food production and food supply, however it does not go nearly far enough to capture the importance of the Pukekohe Specified Vegetable Growing Area, transition to a low-emissions economy and the many layers of regulatory and legislative change that will impact growers and the rural community in the coming years. Some of these changes will be the responsibility of Auckland Council to implement, and some are outside of the Council's scope. All of the changes, however, will have an impact on the rural production areas of the region and on this basis need to be considered as part of any future development strategy.

There is a significant focus on land fragmentation and reverse sensitivity issues, which are obviously important, but what about the other factors that ensure rural production can continue and develop? HortNZ would like to see a more well-developed rural section that identifies the pressures and accurately captures the future frameworks that will influence rural production capability and capacity.

HortNZ is also concerned with some aspects of the Auckland Rural Productivity Review which is likely to inform plans such as the FDS, which in turn, will inform other plans and strategies. First and foremost, the timeframe captured by the review is over the height of the Covid-19 Pandemic[15]. This was an incredibly unique time period, filled with constant pivots, changes and adaptations that all sectors had to work to. Horticultural production was no different, and arguably had more complex conditions to work under with many horticultural operations having activities located inside and outside the Auckland/Waikato boundary. This makes it a difficult time period to use for long-term assumptions about productivity. Furthermore, HortNZ would like to see more information about

3.1. Principles

The Future Development Strategy does state in Principle 1(a) that *'growth in rural areas will be minimal to retain the rural environment and rural productivity.'*[16]

[14] Freshwater farm plans | Ministry for the Environment
[15] The Auckland rural Productivity Review Report covers a time period of 2018 - 2022
[16] 8d43ab428c3c2ddc7de9bb7b87b70880_FDS_Final_Consultation_Draft.pdf (amazonaws.com)

However, it does not adequately provide a plan for the rural areas of the region, outside of establishing a boundary where urban growth will be contained to.

Principle 2 – Climate change adaptation

There is an opportunity to incorporate in this principle better recognition and understanding of how climate change will impact rural production and what changes may need to be considered to ensure the rural sector can respond to the challenges of climate change.

Further urban growth may not be appropriate in some areas with greater climate change related risk, however other activities, such as horticultural production could occur instead.

Principle 3 – Infrastructure investment

While we note that at a regional scale, the cost of developing infrastructure in existing urban areas is more cost effective, rural communities by nature are spread out. Usually rural centres are smaller satellites that support a population that is dispersed over a wider area. It is important to find balance between making economic and fiscally responsible choices with ratepayer money, and ensuring rural communities are adequately supported with infrastructure. This includes provision of ongoing maintenance of any infrastructure developed.

Community facilities such as libraries, fulfil and important social function in rural communities where isolation can be a challenge.

HortNZ would like to have better understanding about what infrastructure and support services are being developed or provided for to support the expansion in urban development that has occurred in recent years.

Principle 4 – Protect and restore the natural environment

Manawhenua make special partners when working towards protection and restoration of the natural environment. Their unique relationship with the whenua can help inform approaches to the natural environment.

The natural environment is important for supporting our populations so balancing development, production and the health and well-being of the natural environment is best approach in collaboration with mana whenua, industry and communities.

Principle 5(c) speaks to enabling enough housing and business capacity to meet future needs, it is also relevant to ensure rural production is enabled and provided for in 5(c)

Growth scenarios

HortNZ advocates for growth scenarios that avoid development in or adjoining rural production areas and ultimately support rural areas to be productive.

HortNZ is mindful that reverse sensitivity is a key issue for growers who are operating at the rural – urban interface. Intensification on the boundary often leads to increased complaints from the urban population about rural operations. Further to this, the type of development occurring at the edge of zone boundaries matters. Urban development and development of activities to support a growing

urban population on the fringes of urban centres will have an impact on the rural area. Use of setbacks, approaches to reverse sensitivity

It is an opportunity for Auckland Council to outline how urban growth will be managed at the rural/urban interface and how rural production activities will be prioritised to ensure these areas are able to continue to be productive.

Part 4: Spatial response

While we understand having established centres such as Pukekohe and Warkworth as 'anchors' in the rural nodes, these areas are the central hubs supporting rural production areas. Community facilities such as libraries often hold an important social functions in rural areas, arguably more so than in urban centres.

HortNZ is mindful that the recent urban development that has occurred in rural areas, such as Warkworth and Pukekohe, has been to provide housing for the growing Auckland population, rather than for housing to support the rural centres. We anticipate this will lead to more reverse sensitivity issues as we have seen in other areas of New Zealand. The FDS provides an opportunity to ensure the rural production areas in the Auckland region are able to continue being productive with the increased growth in housing development.

Future Development Plan 2023 #8151

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Your feedback

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

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Tell us why

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

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

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

Tell us why

Other feedback

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

Kia ora. Please see attached submission from the New Zealand Telecommunications Forum.
There doesn't seem to be a way to send in a sub, so using this last field.

TCF Submission to Auckland Council
On Auckland's Draft Future Development Strategy
31 July 2023

Introduction

1. Thank you for the opportunity to comment on the draft Future Development Strategy for Auckland.

2. This submission is provided by the New Zealand Telecommunications Forum (TCF). The TCF is the telecommunications sector's industry body which plays a vital role in bringing together the telecommunications industry and key stakeholders to resolve regulatory, technical and policy issues for the benefit of the sector and consumers. TCF member companies represent 95 percent of New Zealand telecommunications customers.

3. The focus of our submission is on the critical role that telecommunications infrastructure will play in the growth of Auckland. For example, quality connectivity (internet and phone) is essential to plans to address housing shortfalls through housing intensification, and to reduce emissions by having more places of business close to where people live.

4. We cover the following issues in our submission:

    a. Connectivity challenges that come from denser residential and commercial areas

    b. The role telecommunications can play in helping to reduce emissions

    c. Resilience issues and adapting to climate change

    d. Efficient and equitable infrastructure investments.

Telecommunications and the planning system

5. The planning system is both an enabler and a barrier to getting connectivity to the people of Auckland. The telecommunications industry engages with the planning system (and central government resource management laws) to be able to install, maintain and upgrade network infrastructure such as fibre optic cables, cell towers, poles and antennas. We apply for resource consents and designations, make submissions on plans and seek plan changes.

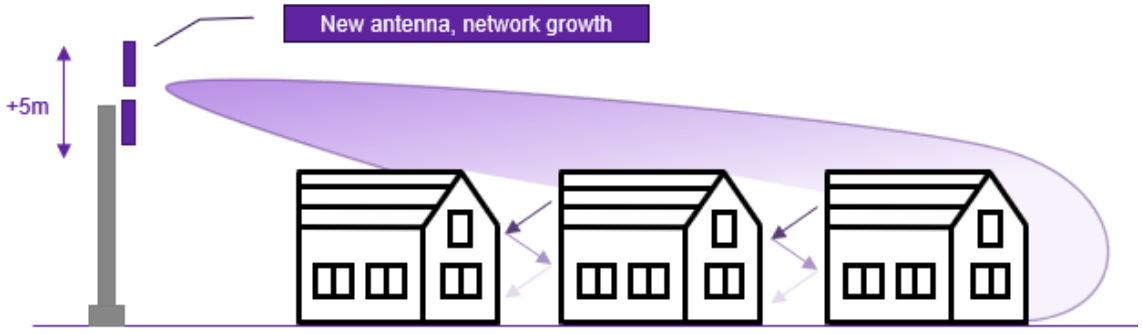
6. As the built environment of Auckland intensifies, so does our need to engage with the planning system. For example, suburban buildings are getting taller as medium density housing standards (MDRS) rules apply, permitting buildings up to 12 metres, taller than the permitted height for a mobile connectivity site. Wireless signals are more likely to be obstructed by buildings, and without mitigations we expect to see coverage blackspots appearing.

7. The first picture below shows the status quo. The second picture shows where we need to get to in terms of pole versus building height.

Wireless signals do not travel easily through obstructions, and this can result in blackspots within the wider network coverage areas (where customers are in the shadow of a building) and can lead to radio emission safety concerns. Tight equipment envelopes limit our ability to deploy new antenna for new growth or sharing.



The ideal height for mobile antennas is 5m taller than surrounding buildings and obstructions, with space for additional antennas used for sharing the mast and growth.



8. This will have an impact on the quality of mobile connectivity experienced by people in Auckland. We also expect this situation will increase resident concerns about radio emissions from towers. While existing towers broadcast from antennas that are typically above nearby residences, the same antenna will be located at a similar height to upper floors in a three to six story building.

9. There is also an issue where we use poles for street lights to co-locate telecommunications equipment. With local authorities deploying narrower and shorter streetlights of around six metres to accommodate LED lights, this reduces the height envelope for new cell sites.

10. In short the issue we have is one of pole height. The allowed heights under NESTF (the National Environmental Standards for Telecommunications Facilities) have not kept pace with changes in allowed building heights. While we have repeatedly raised this issue with MFE and MBIE, they have told us that changes will not be made under the RMA, and may not even make it into the first National Planning Framework. This means we need to seek resource consents or plan changes to be able to install mobile sites that are tall enough to avoid black spots. These processes take a lot of time and are very costly.

11. The Council can help address these issues by making changes to the Auckland Unitary Plan (AUP). Chapter E26 Infrastructure needs review and amendment to enable infrastructure to better support growth in Auckland. More specifically, the following provisions need updates:

    a. E26.2.3.1 activity table - network utilities and electricity generation – all zones and roads. With a focus on the activities A31 to A42, especially poles, cabinets and antennas in the road

    b. E26.2.5.1 activities within roads and unformed roads. With a focus on:

        i. clause (2) re building area

        ii. clause (3) re height

    c. E26.2.5.2. activities within zones in E26.2.3.1 activity table. With a focus on:

        i. clause (3) re height

    d. E26.2.5.3. specific activities within zones in Table E26.2.3.1. With a focus on:

        i. minor infrastructure upgrading

        ii. clause (6) re antennas attached to buildings

iii. clause (7) re standards E26.2.5.3(8) - (10)

iv. clause (8) re the maximum number of antennas

v. clause (9) re the maximum number of antennas in the Business – Local Centre Zone and Business – Neighbourhood Centre Zone

vi. clause (11) re masts and attached antennas identified as permitted activities in Table E26.2.3.1

e. E26.2.6. Assessment – controlled activities. With a focus on:

i. E26.2.6.2. re assessment criteria

f. E26.3. Network utilities and electricity generation – vegetation management

g. E26.4. Network utilities and electricity generation – trees in roads and open space zones and the notable trees overlay

h. E26.9. Network utilities and electricity generation – special character areas overlay – residential and business

i. E26.10. Network utilities and electricity generation – Sites and Places of Significance to Mana Whenua Overlay

j. E26.11. Network utilities and electricity generation – volcanic viewshafts and height sensitive areas overlay

k. E26.12. Network utilities and electricity generation – Auckland War Memorial Museum Viewshaft, Local Public Views, Ridgelines Overlays

l. Notification, review the need for mandatory notification of applications when required in E26.

12. The points we make below about the telecommunications sector's role in emissions reduction and resilience rely on these planning issues being addressed.

The role that telecommunications can play in emissions reduction

13. Principle one of the draft strategy talks about reducing greenhouse gas emissions. Ensuring all Aucklanders have access to quality connectivity will be key to reducing emissions. Internet access helps in a number of ways:

a. Avoiding transport emissions by enabling more people to work and study from home. This goes beyond connecting people virtually, to enabling secure remote access to systems and services, and monitoring of physical assets. A consequential life cycle assessment was undertaken in 2022 to measure how working from home one day a week affects the size of an employee's carbon

footprint. This study found that the average New Zealand office worker who works one day a week from home will save 4.2kg in carbon emissions per day, compared to commuting into the office every day.

b. Using smart technology to reduce energy consumption for individual households and public institutions such as schools and hospitals. This includes smart thermostats, heat pumps, and water heaters, and demand management technologies to support grid decarbonisation and reduce peak demand by controlling and coordinating energy heavy activities such as EV charging.

c. Using smart cities technology to help tackle climate change. For example, for traffic management, optimising refuse collection, monitoring pollution, optimising street lighting, ride sharing, energy metering, and switching on devices at times to optimise energy use.

5. The smart technologies we mention rely on sensors and telecommunications networks to record and relay data.

6. A recent study found that digital technology, as an enabler of a variety of actions, could collectively reduce annual emissions 7.2 Mt by 2030 - the equivalent of 42 percent of Aotearoa New Zealand's current emissions budget targets.

7. We recommend that internet access and digital enablement more generally be included as part of climate change mitigation part of the Future Development Strategy.

Resilience and adapting to climate change

14. Principle two of the draft future development strategy talks about adapting to the impact of climate change, and highlights the importance of resilient infrastructure.

15. As an industry, we are investing in the resilience of our infrastructure. However, resource management settings and local planning rules can be a barrier to doing this. For example, we use roadside cabinets to store telecommunications equipment and keep it safe from the elements. This includes equipment such as batteries which provide backup when power fails. The size of the cabinets dictates the amount of equipment that can be stored and consequently the capacity to enhance performance and resilience.

16. Similar to the pole size example discussed above, outdated provisions in the NESTF have not kept up with new technology and resilience requirements. Small increases to the allowed height and footprint of cabinets will address this. Without these changes telecommunications network providers need to seek costly and time consuming resource consents for each cabinet.

17. The Council can help address these issues by reviewing aspects of the Auckland Unitary Plan that affect telecommunications, especially the provisions concerning cell sites (pole height, antenna size and cabinet) located in the road. These are outlined above in paragraph 11.

Efficient and equitable infrastructure investments

18. Under principle three the draft strategy notes that ownership of the infrastructure that Aucklanders rely on is spread among different agencies with different priorities, meaning it can be difficult to get coordinated management and delivery. This includes privately owned infrastructure such as telecommunications.

19. The draft goes on to propose the introduction of integrated planning, to coordinate investment and planning. More integrated planning is something the telecommunications industry very much supports. The lack of planning to integrate infrastructure with land use development is a barrier to providing the connectivity that Aucklanders need. Too often connectivity is an afterthought in housing developments and road transport projects, reducing options and making the process of installing telecommunications infrastructure more expensive and time consuming.

20. When the Council is considering how to allocate its budget for critical infrastructure it needs to consider contributions from developers. It also needs to consider providing access to infrastructure funds to both publicly and privately owned infrastructure. The pace of new housing development in Auckland means it is not possible for network utility operators to fund new infrastructure in all places. This could slow down housing plans.

Questions about this submission

21. The New Zealand Telecommunications Forum would be happy to answer any questions about our submission. Please contact kim.connolly-stone@tcf.org.nz in the first instance.

Future Development Plan 2023 #8152

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Your feedback

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31 July 2023

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

Submission on the Draft Future Development Strategy – NZ Storage

Introduction

This is a submission on the draft Future Development Strategy (**FDS**) on behalf of NZ Storage Holdings Limited (**NZ Storage**). The FDS was notified for submissions on 6 June 2023.

Background to NZ Storage

NZ Storage is a yard based storage business. It has experience in the requirements for and delivery of facilities that meet the needs of businesses that provide jobs and support the growth of the Auckland economy. NZ Storage has interests in land within the Drury West 3 area identified in the draft FDS. That land is close to road and rail transport infrastructure that has had significant public investment, can be serviced and is free from significant flooding or other natural hazards.

Summary of submission

Auckland Council (**Council**) is required to prepare an FDS in accordance with subpart 4 of Part 3 of the National Policy Statement on Urban Development 2020 (**NPSUD**). NZ Storage is supportive of the response to growth within Auckland being led by an FDS prepared in accordance with the requirements of the NPSUD. However, NZ Storage has significant concerns with the draft FDS as set out in this submission.

Meaningful consultation and engagement

As required by clause 3.15 of the NPSUD, a key part of preparing an FDS is ensuring it is prepared with genuine and meaningful consultation and engagement with the community, infrastructure providers, iwi and hapū, and land owners and developers. As has been the case with preparation of FDSs by other council in New Zealand, this engagement should be broad-based and encourage blue sky thinking, all informed by good quality evidence. Open communication ensures that the process is democratic and recognises that a wide range of parties will need to come together to implement the FDS. A failure to meaningfully consult risks the Council zoning land and/or providing infrastructure in less efficient locations – that outcome would be more expensive overall.

Along with achieving well-functioning urban environments in its existing and future urban areas, ensuring there is sufficient development capacity for business and housing is a key purpose of an FDS under clause 3.13. Land supply is a central aspect of ensuring sufficient development capacity for industrial land, as it enables opportunities for high-value businesses to grow and employ more people. Economic development of the region may be constrained if the draft FDS is not prepared properly, with negative consequences for the New Zealand economy as a whole.

Short-Term infrastructure constraints are driving the Long-Term Plan

Overall, it is apparent that short-term infrastructure constraints are driving the long-term strategic plan for Auckland. The short-sightedness of this approach and the lack of any meaningful public discussion is disappointing. We encourage the Council to take a long-term view, over a 30-year horizon as required by the NPSUD. NZ Storage accepts that the Council is facing a significant infrastructure deficit and that it needs to look to alternative forms of funding to pay for growth, including higher levels of direct government investment. If the Council and development sector work proactively together and look for opportunities, an appropriately prepared FDS provides the opportunity to negotiate this outcome with the Government in a comprehensive way. As it stands, the Council's unilateral approach to planning for growth in Auckland may help to suppress increases in general rates, but it fails to realise the longer-term and wider benefits of growth for the community.

Fundamental issues

In addition to these over-arching matters, NZ Storage considers that there are fundamental issues with the draft FDS that need to be addressed to ensure that the long-term strategic planning for growth results in a well-functioning urban environment. The matters raised illustrate that the draft FDS does not meet the minimum legal requirements set out by the NPSUD and therefore a restart of the process is the most appropriate and efficient outcome. If the draft FDS is not restarted then, as a less preferred alternative, NZ Storage seeks a number of changes to the draft FDS to at least address its significant concerns about proposed delays to sequencing of the Future Urban zone and in Drury.

In particular:

- NZ Storage is concerned that the Council has not completed its assessment of business demand and capacity and therefore the evidence base for the FDS is deficient. Further transparency and rigour is needed in relation to the analysis that has informed the location and sufficiency of business land.
- NZ Storage considers that any change in sequencing of future urban areas needs to be based on robust evidence informed by spatial analysis and not driven by current infrastructure limitations.
- NZ Storage does not support the delay in sequencing of the future urban zone land at Drury to 2035+ given the significant infrastructure investment already underway in Drury and seeks amendments to the FDS that reinstate the Future Urban Land Supply Strategy 2017 (FULSS) timing and which will result in more flexibility for the development community to respond to opportunities.

The submission below elaborates on these matters.

Demand and capacity analysis

Despite the draft FDS stating that it meets the statutory requirement under the NPSUD to ensure there is at least sufficient development capacity to meet demand, it is not clear from the draft FDS or the supporting growth scenario evidence report that this is actually the case. In particular, there appears to be discrepancies or a lack of evidence used to inform this assessment, and it is not clear how the

draft FDS meets the requirements set out in section 3.3 in relation to feasible and realisable capacity and the appropriate competitive margin.

In relation to business demand and capacity, the draft FDS is based on initial results from the Council's Housing and Business Capacity Assessment which is still in draft form. The draft FDS concludes that there is likely to be sufficient plan enabled business capacity on a region wide basis however, there will be shortfalls in sub-regions for specific business sectors, particularly land extensive sectors, which NZ Storage understands is approximately 1,000 hectares. Given that this assessment is based on plan enabled capacity and has identified capacity shortfalls for land extensive sectors, this does not appear to meet the NPSUD requirements and is a significant weakness of the draft FDS. NZ Storage considers that more transparency and rigour is needed around the capacity analysis for business land.

Growth scenarios for development

Clause 3.14 of the NPSUD requires that the draft FDS is informed by "consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS."[1] NZ Storage notes that while four growth scenarios have evaluated different levels of intensification and greenfield growth, this has been undertaken at a regional strategic level, with no understanding of the spatial composition of the different scenarios. In NZ Storage's view this analysis needs to be developed further with more detailed spatial analysis that evaluates:

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

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

- There has been no Council-initiated industrial rezoning under the Auckland Unitary Plan (Operative in Part) of any consequence, and the approach to the draft FDS suggests it is unlikely there will be any more. The Natural and Built Environment Bill will significantly reduce the ability to promulgate private plan changes, so a lot will depend on Council strategies such as the FDS. Industrial land is already in short supply, and if future urban zoned land is not live-zoned within the programmed release timeframe, this situation will be exacerbated. As the supply of industrial land dries up, if Council is not rezoning additional land and developers are unable to, there will be enormous negative impacts on the wider industry and the Auckland economy.

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

- Further analysis of greenfield areas not included within the Future Urban zone is required. Noting that there may be new opportunities for development beyond those identified over 10

[1] National Policy Statement on Urban Development, clause 3.14(b).

years ago as part of the Auckland Plan and the original Future Urban Land Supply Strategy.[2] Input from the development sector would support this aspect of the scenario development and analysis.

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

NZ Storage is strongly of the view that a different growth strategy may emerge as a result of more detailed analysis.

Sequencing and release of future urban land

The FDS is proposing to significantly push out the sequencing for release of future urban areas based on current funding limitations and will require the identified infrastructure triggers to be completed before any release of future urban land. NZ Storage is opposed to the identification of "infrastructure triggers" for significant areas of future urban land.

In particular:

- The analysis undertaken to identify the infrastructure upgrades required is likely to have been undertaken at a high level with no further explanation provided as to how the proposed triggers have been identified.

- The NZ Storage land is suitable to be urbanised, irrespective of the infrastructure triggers identified for Drury West (Stage 3) in the draft FDS. The land can be suitably serviced for three waters infrastructure by privately funded upgrades to existing public infrastructure and/or privately funded onsite water treatment solutions. Committed and planned transport infrastructure upgrades within the wider Drury can support urbanisation of Drury West (Stage 3) .

- The actual infrastructure requirements will vary depending on factors including the nature of the development, infrastructure solutions proposed and the status of development on neighbouring sites. Further, over time, infrastructure requirements and solutions are likely to change.

- The draft FDS will restrict efficient development and the ability to stage the release of land alongside progressive investment and development of innovative infrastructure solutions. This will delay or prevent much needed development capacity within the Auckland region from being realised.

- The approach to the release of future urban zoned land under the draft FDS will limit the ability for future decision makers to give effect to policy 8 of the NPSUD. Policy 8 requires local authorities to be responsive to plan changes that would add significant development capacity and contribute to well-functioning urban environments, including where the development

[2] Auckland Future Urban Land Supply Strategy, July 2017: https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/topic-based-plans-strategies/housing-plans/Documents/future-urban-land-supply-strategy.pdf

capacity is out-of-sequence with planned land release. NZ Storage consider that a rigid approach where all the identified infrastructure triggers must be in place prior to the urbanisation of any land would be inconsistent with this directive.

In summary, current infrastructure limitations should not be driving land use decisions and a long-term holistic approach is needed which:

- Identifies enough land for growth in the right locations where it can be delivered efficiently.
- Identifies what infrastructure is needed to support all future development (not just greenfield), and roughly how much will it cost, focusing on the next 10 years.
- If there is a funding gap, think creatively to find solutions, working in partnership with government and private sector.

Drury West

NZ Storage supports the future urban zoned areas in Drury being identified as a Priority Area for Investment (Years 11-30) and consider that the identification of development timing recognises the existing and planned urban growth within Drury. NZ Storage does not support the delay in sequencing of the future urban zoned land at Drury to 2035+ in the draft FDS from 2028+ identified in FULSS.

Drury is an area of transformation with a new metropolitan centre, train stations and significant infrastructure investment committed. This includes a new Drury West train station, electrification of the rail network between Papakura and Pukekohe, upgrades to State Highway 22 to improve safety and facilitate public and active modes, and strategic walking and cycling connections parallel to the North Island Main Trunk Railway Line. Given that significant investment is already underway, the draft FDS needs to provide flexibility for the development community to respond to opportunities within the Drury future urban zoned land and provide for the efficient use of government funded infrastructure.

Relief sought

NZ Storage requests and recommends that Council delay the adoption of the FDS to enable meaningful engagement with the community and development sector and to address the matters above. It is neither efficient nor appropriate to rush to finalise the FDS in light of the current pause on the Intensification Planning Instrument (Plan Change 78) process and the uncertainty around it given the upcoming election, as well as the status of some of the documents underpinning the FDS process (such as the Housing and Business Development Capacity Assessment, referenced above).

However, should an FDS be adopted it seeks that the Council:

a) Amends the Drury West (Stage 3) area in Figure 18 to a Spatial priority area for investment (Years 11-30) instead of Years 1-10.

b) Amends the sequencing of future urban zoned land at Drury West (Stages 1, 2 and 3) in Appendix 8 to 2028-2032 (as per the current FULSS) and change the FDS Response to "No response".[3]

[3] Draft Future Development Strategy, Appendix 8, page 38.

c) Amends the new timing of the future urban zoned land at Drury West in Figure 44 to 2025+ from 2030+

d) Amends the draft FDS to provide greater flexibility and enable the staged release of land, in line with progressive and innovative infrastructure solutions and policy 8 of the NPSUD.

e) Amends the draft FDS to specify how it will achieve sufficient infrastructure ready and suitable development capacity as set out in clause 3.3 of the NPSUD.

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

Decision sought and hearing

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

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

[redacted]
(Person authorised to sign on behalf of submitter)

Address for Service

NZ Storage Holdings Limited
c/- Barker & Associates
[redacted]

Future Development Plan 2023 #8154

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Please see attached submission

31st July 2023

The Surveying Company LTD
[redacted]

Attention: Future Development Strategy
Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

SUBMISSION ON AUCKLAND'S FUTURE DEVELOPMENT STRATEGY 2023-2053

Scope of submission:
This submission relates to Auckland Council's Future Development Strategy (FDS) and is from:

The Surveying Company Ltd
[redacted]

The Surveying Company Ltd is a multi-disciplinary Property Development Consultancy that has been providing specialised Planning, Surveying and Civil Engineering services throughout the Waikato, Auckland, including the former Franklin, Papakura, Manukau Districts, and Hauraki Districts for the past 30 years. This includes the application and management of Subdivision Resource Consents and Land Use Consents associated with the use and development of land.

Submission overview:
As a general overview, we consider that having the main focus of the FDS to be growth/intensification within existing urban areas will be detrimental to achieving the resilient built systems and high quality living environments sought for Auckland's population.

We also believe that the reduction in future urban areas and the deferred timing of development for the remaining future urban areas is unjustified, particularly as:

- the development of these areas has been anticipated for a number of years through the Future Urban Zoning under the Auckland Unitary Plan (Operative in Part) ('AUP(OP)');
- these areas will enable homes and jobs to be located in close proximity, and are suitably located, near main transport routes;
- the development of these areas should be enabled where it can be determined that satisfactory provision has been made for infrastructure;
- the reduction in these areas and the longer phasing of timeframes will continue to result in shortages of industrial zoned land, affecting accessibility and affordability of this land and forcing industrial businesses to locate in areas where these activities are not anticipated under the AUP (OP).

These issues are addressed in turn in more detail below.

1. Focussing growth within existing urban areas

The population of Auckland is expected to increase by an additional 520,800 people (30%) over the next 30 years, with an additional 282,000 more jobs. The FDS intends to accommodate this additional housing and business development within existing urban areas. We consider that this approach to growth will likely result in the following:

a) A reduction in varied housing densities and types, potentially leading to a lack of market demand for more intensive development, particularly in mixed use areas.

b) Public facilities such as education centres, health services, and sports and recreation centres within existing urban areas are largely already at capacity. Population growth focussed in existing urban areas will put these existing public facilities under further pressure. This is likely to reduce access opportunities for the public to these facilities, impacting on the ability of all people to provide for their social, economic and cultural well-being. Any expansion of these existing facilities is limited due to land size and location. It is unclear if capacity studies have been carried out to enable a better understanding of the impact of the anticipated growth on existing public facilities.

c) Difficulties achieving safe, accessible well-functioning urban environments through redevelopment of existing urban areas constrained by existing built development and by infrastructure. For example, intensification of existing urban areas will mean less private back yard areas, increasing reliance on green spaces for recreational opportunities. Intensification of existing urban areas has limited opportunities for useable public reserves to be set aside and for the provision of cycleways and additional pedestrian linkages.

d) Further degradation of the natural environment in terms of water quality, particularly as there will be more pressure on the capacity of the existing wastewater and stormwater systems which will detrimentally impact on water quality.

e) Reliance on existing business sites to accommodate the majority of the anticipated 282,000 jobs will lead to a constrained capacity of land for industrial activities, increasing the value of business land and affecting access/affordability, particularly for smaller business owners. The FDS even acknowledges that there could be shortfalls of business land in some sub-regions, particularly for land extensive sectors in the short to medium term. This is proposed to be addressed in part through an intended extension of mixed use areas, which we consider will not be useful in addressing this acknowledged shortfall of industrial land. This will continue the trend of larger industrial activities locating outside of Auckland, such as the Sleepyhead Estate development at Ohinewai, with flow on effects in terms of employment opportunities.

f) Opportunities for reverse sensitivity effects to arise near these business sites will increase and will need to be carefully managed, particularly as the FDS seeks to enable mixed use neighbours and intensify residential development near existing business areas.

g) Costs associated with building and the consenting process are escalating, which influence the ability of private landowners to develop their land and contribute to the supply of additional affordable housing as sought by the FDS.

2. Infrastructure

Recent adverse weather effects have highlighted the impact of flooding hazards in existing built up areas, noting that Auckland Council's Proposed Plan Change 78 : Intensification was granted an extension of time for 12 months by the Minister for the Environment in April 2023 to enable Council to undertake natural hazards and flooding investigation work. The findings of these investigations need to be taken into account, and align with, the FDS.

As a company, in our experience the redevelopment of existing urban areas has implications with stormwater infrastructure. This is particularly the case in Pukekohe where it is rare to have stormwater connections available and redevelopment options for stormwater are generally limited to groundwater soakage or to the kerb. The focus of the FDS on brownfield development therefore needs to consider the implications of a lack of infrastructure in existing urban areas.

Spatial priority areas for investment are identified within the FDS which show that within the south, only the Drury-Opaheke area has certainty of investment within the next 10 years. This means that other areas where land is live zoned through plan changes, but where there is no servicing by bulk infrastructure, will not have certainty of infrastructure investment within at least the first 1-10 years. This has implications in terms of land availability and affordability, particularly for industrial activities.

3. Reduction of, and deferred timing of development of, future urban areas

The Auckland Unitary Plan (Operative in Part) identifies areas for future development (Future Urban Zone) with area specific Structure Plans (i.e the Drury-Opāheke Structure Plan August 2019) setting out the various land uses and infrastructure and likely timing of these areas being rezoned and available for development. These Structure Plans are intended to form the basis of future Auckland Council initiated plan changes to enable the indicative zoning shown in the Structure Plans to become live. The National Policy Statement- Urban Development 2020 (NPS-UD) also guides the development Future Urban Zone land.

The reality is that while the Auckland Unitary Plan (Operative in Part) provides for future land development through future urban zonings, the land is not served by infrastructure meaning it is not development ready in terms of the NPS-UD. This has led to delays with Auckland Council initiating plan changes to make the indicative zoning live, resulting in a number of private plan change applications to enable land development in these areas to cater for demand.

The FDS provides for limited urban expansion, with four future urban areas proposed to be removed altogether (such as Takanini and Opaheke). The timing of development within future urban areas is proposed to be deferred, and infrastructure triggers are proposed that are linked to development readiness of areas. The intent of this approach is to avoid private plan change applications which Council have deemed to undermine the sequencing and timing of growth.

We consider this approach will result in the following:

1. The FDS will further delay development of future urban areas that have been anticipated to be developed prior to 2030, removing certainty for landowners who have been waiting for Council to initiate plan changes to make the indicative zoning live, and holding these areas in transition. This approach impacts on the social and economic well-being of these landowners. The delay also has

implications on the rates associated with these areas, with a higher rateable value now set to continue to apply over a longer timeframe.

2. The availability of funding for bulk infrastructure should not be a reason to delay development of future urban land, particularly when that land has been identified for future development for a number of years. Development of these areas should be enabled, particularly for smaller scale developments, where it can be determined that suitable provision has been made for infrastructure on the site, allowing for connections to existing or future reticulated infrastructure. An example in Pukekohe is Grace James Road and William Andrews Road where the infrastructure connections are in place and the land is development ready and there should be no reason why development is delayed in these areas.

3. Site specific development and engineering solutions may be achievable to satisfactorily address natural hazards in those areas identified for removal within the FDS (which also notes that natural hazard constraints do not automatically indicate a high level of exposure to risk). On this basis, the removal of the four future urban areas may be premature without a better understanding of site specific natural hazard effects and the possibility of engineering design solutions.

4. The FDS acknowledges that land for extensive industries has specific requirements for large, flat sites with good accessibility which have been identified with future urban areas, and that heavy and light industrial use are moving towards the periphery as existing industrial land is highly constrained for expansion. The deferring of timeframes for development of future urban land will continue to contribute to a shortage of industrial land, the reality of which will mean that industrial activities will look to locate in areas where they are not anticipated within the AUP(OP). Specifically, within the Pukekohe future urban areas there is a high demand for industrial land and while the FDS implies that as a whole there is sufficient capacity, industrial land needs to be enabled within these areas as only infrastructure upgrades are required, rather than significant bulk infrastructure.

Relief Sought:

TSC are seeking the following:

1. That the FDS is delayed until capacity studies on existing infrastructure capacity and natural hazards and flooding investigation work is undertaken as these are likely to influence the direction of the FDS. In addition, site specific natural hazard assessments should be undertaken in relation to those future urban areas identified for removal in the FDS.

2. That the FDS is amended to enable the development of future urban areas to continue as planned, without the deferred timeframes, and that the four areas proposed for removal are reinstated, particularly where design and engineering solutions are able to address the natural hazard risk identified in a site specific assessment.

3. The timing of Council initiated plan changes for all of the future urban areas within Pukekohe, particularly for the areas containing Industrial land, is retained as per the FULSS 2017. This is because a Structure Plan has been prepared and no significant bulk infrastructure is required, only upgrades, with infrastructure connections readily available in some of the areas.

4. That further investigations on reverse sensitivity issues are undertaken to better understand the impact of focussing growth within existing urbans areas as the FDS seeks to enable mixed use neighbourhoods while safeguarding light and heavy business areas.

5. That industrial areas are prioritised within the FDS and that further capacity studies specifically on Industrial land are undertaken, having regard to the locational and size requirements of the industrial sector. These studies will clarify if the supply of Industrial land within existing and future urban areas is sufficient to enable, and support, the anticipated growth in this sector.

6. That further capacity studies are undertaken to enable a better understanding of the impact of the intensification of existing urban areas on the demand for public facilities.

Prepared by:

[redacted]
Planner - TSC

Authorised by:

[redacted]
Director - TSC

Future Development Plan 2023 #8155

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

brownfields intensification should be considered hand in hand with greenfields development to provide options for Council and residents in the city. By ruling out one over the other seems short sighted as these are not mutually exclusive, but rather can complement and be executed in parallel

Accessible local centres

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

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

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

Agree

Tell us why

Yes but not limit this to existing local centres only. Broader view should be taken to plan for new local centres in areas in up and coming areas where people want to live, rather than force people who don't want to live in high rises out of Auckland.

Avoiding hazards

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

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

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

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

Disagree

Tell us why

Council has focussed approach on hazard assessment predominantly on FUAs only. Hazard assessment is broader and risk is huge in existing urban areas, yet the FDS does not go into any detail assessment of existing urban areas at risk, and how to resolve these, such as the west Auckland areas hit by the anniversary floods. There are many existing urban areas that need infrastructure upgrades to deal with these hazards yet none are specifically mentioned in the Draft FDS, except broad brush principals outlined, with no explicit detail on how they will be policed/monitored

Resilient infrastructure

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

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

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

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

Other

Tell us why

agree where practical and cost effective, or which can be funded by individuals and not by the ratepayer in genera. Only where outcomes are justified, not just doing for the sake of saying we did it.

Other feedback

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

Auckland Council has made an error in proposing in Draft FDS to remove the whole of Takanini FUA. There are parts of Takanini not at risk of hazard, this is the Alfriston area north of the Papakura stream. This area should not be removed from FUA. Please see attached supporting information with more details

#8155

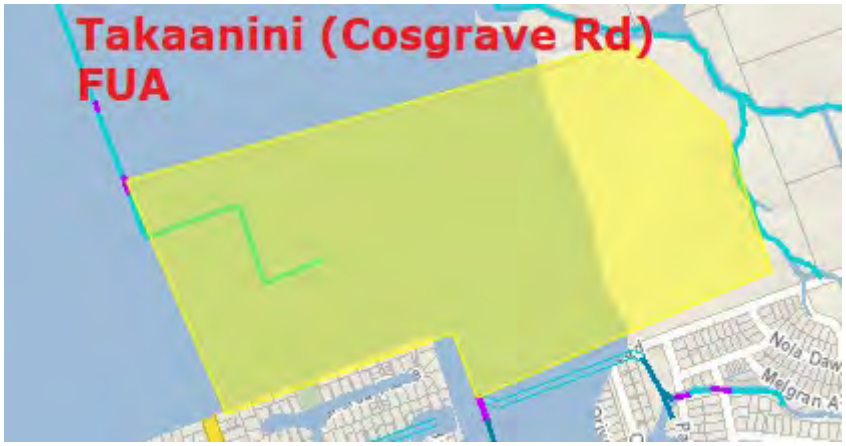
Submission to Auckland Council on the Draft Future Development Strategy (FDS)

Submission

1. The proposed removal of a large portion of the Takaanini FUA, even for areas not exposed to any hazard risk is unfair and unjust to landowners who have purchased based on future urban zone (FUZ) and which Council have levied rates based on future urban zone. Council has happily collected elevated rates paid by landowners in FUZ to subsidise operational costs within other parts of Auckland.
2. The Draft FDS and FUA Evidence report for Takaanini has incorrectly identified the Northern part of Takaanini FUA as being exposed to hazard risk. Only the area south of the Papakura stream and the land immediate adjacent north of the Papakura stream is subject to the hazard risk. All properties to the north of Alfriston Rd do not have any hazard risk.

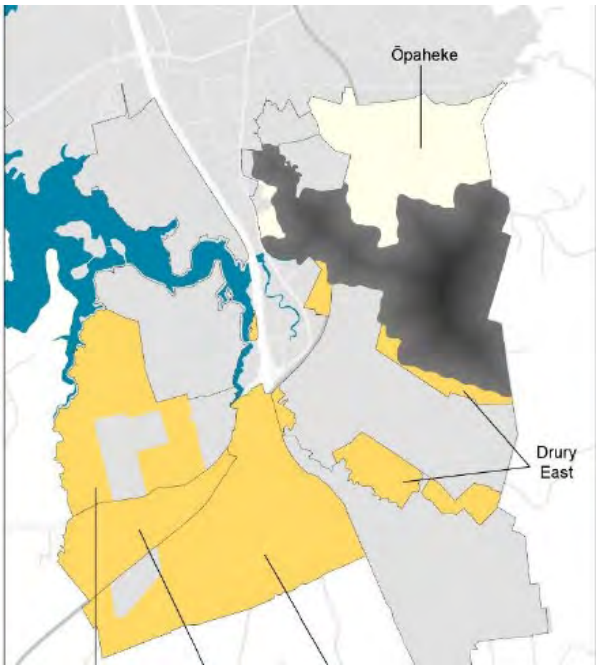


3. The Draft FDS's proposal to remove the whole of Takaanini FUZ is inconsistent with Auckland Council's own approach being proposed for other FUAs. Examples of these inconsistencies being applied to other Southern FUAs :
   a) Draft FDS proposed Takaanini (Cosgrave Rd) FUA is retained, even though the Takaanini flood plain covers 70% of this FUA



b) Opakehe FUA – Draft FDS proposed removal only covers part the FUA which is under the hazard risk - the Slippery Creek portion of the FUA only. The other parts of the Opaheke FUA not within the flood plain is retained as FUA.

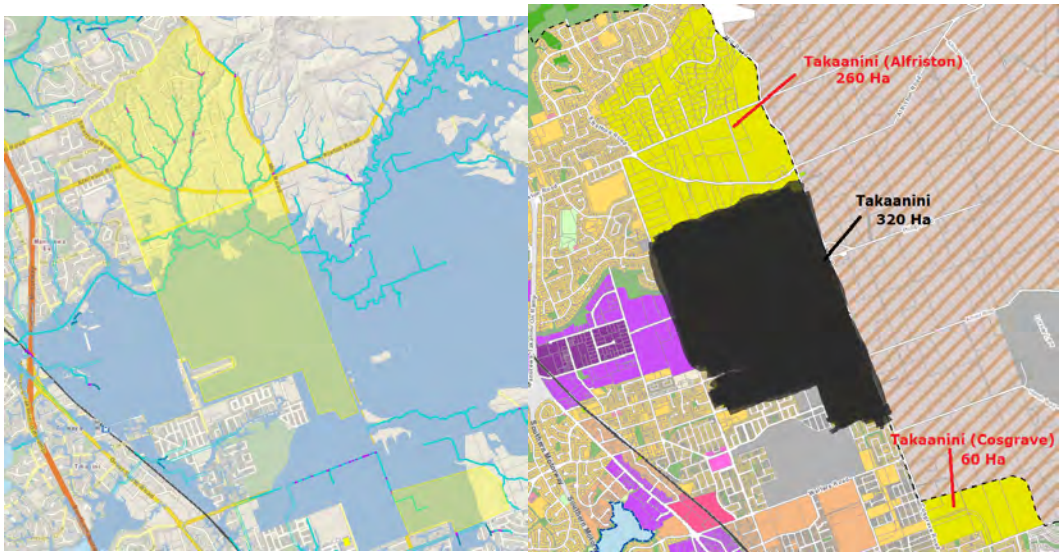
Ōpaheke *(previously named as Ōpaheke -Drury)*	Future Urban zoned	2028-2032	2050+	Timing delay Recommend removal of Slippery Creek portion of FUA



4. The removal of FUA for the part of the Takaanini is unjustified and causes destruction of land values unnecessarily without achieving any benefits or alignment to the principles set out in the Draft FDS
5. FUA Evidence Report – Council recognises that this FUA will lead to lower emissions and KVT when compared to other FUAs given its close proximity to Manukau and Flat Bush where there is an abundance of public transport, business, education and social services. This aligns well with the climate change and emissions reduction principles as outline in the Draft FDS.

Proposed Changes

6. Rather than have a unnecessary heavy handed approach to remove the FUA for the whole of Takaanini, Council should adopt a smarter, more nuance approach to Takaanini FUA by splitting off the area just north of the Papakura Stream which is not within any hazard risk, and reinstate this as Takaanini (Alfriston) FUA



Sub-region FUA cluster	Future urban areas	Status in 2023	FULSS 2017 timing	FDS New timing	FDS approach
South					
Takaanini	*Takaanini (Walters Rd)*	*Live zoned*	*2012-2017*	*N/A*	*Infrastructure review*
	Takaanini (Cosgrave Rd)	Future Urban zoned	2023-2027	2050+	Timing delay
	Takaanini (Alfriston)	Future Urban zoned	2043-2047		No change
	Takaanini	Future Urban zoned	2043-2047	N/A	Recommend removal of Takaanini FUA

a. Rectifies inconsistencies and oversight in the Draft FDS to by reinstating Takaanini (Alfriston) as FUA. This will be in alignment with the approach taken to other FUAs and aligns to principles set out in Draft FDS.
b. Does not destroy land owners' value without valid justification
c. The FULSS 2017 timeline of 2043-2047 is still over 20-25 years away and thus will not impact any of Auckland Council's infrastructure spend nor priority in the 10 year budget
d. Safeguard options for the future and allow pivoting to green fields development without undue cost and process to initiate Council-Led Plan Changes to unzone & rezone this FUA (e.g. change in central govt policy direction, mitigate unaffordable housing, reinstatement of Mill Rd extension project)

Future Development Plan 2023 #8156

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Your feedback

Focusing growth

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

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

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

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

Other

Tell us why
See submission attached.

Accessible local centres

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

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

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

Other

Tell us why
See submission attached.

Avoiding hazards

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

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

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

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

Other

Tell us why
See submission attached.

Resilient infrastructure

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

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

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

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

Other

Tell us why
See submission attached.

Other feedback

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

[redacted]

#8156

SUBMISSION ON THE DRAFT FUTURE DEVELOPMENT STRATEGY

To: Auckland Council (Planning, Environment and Parks Committee)

Name of Submitter: [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Attention: [redacted]

1. SUMMARY

1.1 This submission relates to the draft Auckland Future Development Strategy 2023-2053 (**FDS**) and is filed on behalf of Best Berries (NZ) Limited and its associated companies (**Best Berries**). Best Berries owns, or leases and operates, a significant portion of land in the Riverhead Future Urban Area (**FUA**) and has invested significant resource in its landholdings in the area in anticipation of future urbanisation.

1.2 While Best Berries acknowledges that as a region Auckland should provide sufficient capacity for growth in the right place and at the right time, it is concerned that Auckland Council is seeking to constrain, reduce and limit the extent of growth previously enabled under previous regulatory and planning processes such as the Auckland Unitary Plan. This places an unreasonable financial burden on businesses and landowners who have made significant financial and other investment decisions in the intervening period.

1.3 Specifically, Best Berries opposes the Council's proposal to reclassify the Riverhead FUA for "removal, either partially or entirely" and consequentially rezoned from future urban to a rural zone. We consider the Council has inadequate evidence to support this reclassification, that the assumptions used by the Council are not supported by any technical evidence and are without merit. Best Berries has engaged independent engineering experts to peer review the Council's assessment regarding flooding risk. Its expert view is that the Council's technical work is inaccurate, overstated as to risk and therefore the purported grounds for reclassifying the land have no merit. This assessment by McKensie and Co is attached as Appendix A.

1.4 In addition, Best Berries considers that the growth scenarios modelled by the Council will fall short of providing sufficient urban development capacity to meet Auckland's medium and long term projected demand without the projected Riverhead FUA. By extension, Best Berries considers that the Council will not meet its obligations under the National Policy Statement for Urban Development if the Riverhead FUA is declassified (even partially).

1.5 The Riverhead FUA land is an important area for future development and growth in Auckland. It provides the opportunity for greater housing choice and typology, extends the existing Riverhead township in a logical and sound way, which can be feasibly enabled by infrastructure that is already planned for in appropriate staging. The Riverhead FUA has the potential to provide much needed housing, employment, and community facilities for the existing and future urban land and the opportunity for comprehensive and considered development of the area. Removal of the Riverhead

FUA would result in more ad hoc and inconsistent development of the area through the usual consenting process.

1.6 Removal of the Riverhead FUA would also represent a substantial shift in the prevailing policy since the Auckland Unitary Plan (**AUP**) was made operative in 2016 giving rise to a legitimate expectation that the land would be rezoned for urban purposes. There has been considerable investment made in the consolidation of landholdings and development of plans to give effect to the prevailing policy in line with the timeframes set out in the Future Urban Land Supply Strategy 2017 (**FULSS**). Given the legitimate expectations created, and financial costs incurred by Best Berries in terms of investment and relocation plans for its current business operations, it is only fair and equitable that some form of compensation could be expected in the event of reclassification of the land by Council.

1.7 Best Berries welcomes the opportunity to provide further information to the Council on these matters.

2. INTRODUCTION

2.1 Best Berries owns more than 13ha of the total 80ha Riverhead FUA. When combined with a further 17ha which Best Berries leases, in total it operates more than a third of the total area. Best Berries purchased its properties in 2018 at which time the land was zoned for future urban development.

2.2 Since its acquisition and operation of the Best Berries farm at Riverhead, Best Berries has operated the site on the basis that the land would function as a farm until sometime between 2028 and 2032 when it would then be available for a comprehensive and integrated new urban neighbourhood as set out in the FULSS. This has involved future planning and investment on relocation opportunities for relocation of its current operations. Best Berries' operations provide a transition from the sites' current light rural use and tourism to the future urban landscape.

2.3 In combination with the Kumeū and Huapai areas, the Riverhead FUA was projected under the FULSS to have a potential urban capacity of 6,600 dwellings. The timing of this land being "development ready" was reconfirmed as recently as May 2021 when Auckland Council adopted the Strategic Land Use Framework – North West. This assumed future land use and timing has guided Best Berries' business planning and investment decisions for the past five years.

3. GROWTH MANAGEMENT FRAMEWORK

Riverhead is recognised as an area for further urban growth

3.1 Riverhead is an existing urban area and local centre that is growing at pace. The Riverhead FUA represents a logical continuation of the existing Riverhead settlement pattern and extends the township to the western side of the Coatesville-Riverhead Highway.

3.2 Planned infrastructure upgrades to State Highway 16 and the Northern Interceptor are both progressing at least in part based on the anticipated development capacity for the Riverhead FUA. Te Tupu Ngātahi Supporting Growth has also lodged notices of requirements to route protect

Riverhead Road and the Coatesville-Riverhead Highway to upgrade these roads to an urban standard.

3.3 Removal of the Riverhead FUA, either partially or in full, would be at odds with the decisions taken to date on the development infrastructure for Auckland's North West. We note also that the Council has cited concerns that the Riverhead FUA could adversely contribute to Auckland's vehicle kilometres travelled (**VKT**) without any site specific assessment to support this proposition. We consider that reducing the development capacity and potential future population would actually have a far greater impact on increasing VKT as it would making the operation of frequent and reliable public transport in the area infeasible.

3.4 The Riverhead FUA also provides an opportunity for considered future-proofed development to occur in a planned way, including through the incorporation of three-waters infrastructure. Removal of the Riverhead FUA does not alleviate the growth pressures in the area, it simply redirects that pressure towards intensification and infill housing, or worse, plan changes for the neighbouring market gardens. If the Council removes the Riverhead FUA, it risks leaving the determination of where the future urban areas of Auckland's North West should be to the market.

Identified constraints for the Riverhead FUA have been overstated.

3.5 The Council's assumptions regarding transport related infrastructure are addressed in the earlier section. Here we address the other constraints identified by the Council for the Riverhead FUA and explain how these have been overstated.

3.6 Attached as an **appendix** to this submission is a technical review of the Council's assessment of the stormwater and flood risk for the Riverhead FUA. This review shows that the area at risk of flooding is considerably less than the 30% stated in the FDS, an error that is likely to have resulted from overreliance on a desktop analysis using historic and generic LiDAR data. McKenzie & Co also agree with other recent expert assessments where more detailed flood modelling and engineering proposals support the conclusion that the site is suitable for residential development using any of a number of feasible stormwater treatment approaches available.

3.7 We understand that the Council is particularly concerned over flood risks given Auckland's recent severe weather events and recognise that better stormwater management is required to avoid these issues in the future. Respectfully however we consider that the Council has overreacted in this instance and not considered the relatively strong performance of new urban areas with modern stormwater management devices (eg Hobsonville Point and Northcote).

3.8 We invite the Council to consider the engineering assessment completed by McKenzie & Co and allow this to be assessed through the plan change process rather than determining the issue through the FDS. As McKenzie & Co outline, the Best Berries' site provides an opportunity and potentially useful function in any urban stormwater catchment management planning.

3.9 We note that the Riverhead FUA is not subject to any additional constraints. In summary, the Riverhead FUA:

(a) Does not impact on any Outstanding Natural Landscape, Outstanding Natural Feature or Significant Ecological Area;

(b) Does not impact on sites of significance to mana whenua or on cultural and historic heritage sites;

(c) Does not compromise an extractable mineral resource;

(d) Will not result in incompatible land uses; and

(e) Considers effects on tangata whenua relationships, values, aspirations, roles and responsibilities with respect to an area.

4. COMPROMISING LANDOWNERS LEGITIMATE EXPECTATION AND CREATING FINANCIAL HARDSHIP

4.1 The AUP, along with the FULSS, establishes a legitimate expectation that the Riverhead FUA would be rezoned for urban purposes. The purpose of the FUZ is to identify greenfield areas suitable for urbanisation, which may include areas with local constraints as long as the constraints can be addressed by structure planning.[1] Since Riverhead was zoned as FUZ, several sites have been bought, sold and managed with the assumption that it would be rezoned for urban development within the next decade.

4.2 The FULSS sequenced the Kumeū-Huapai and Riverhead FUA to be development ready in 2028 – 2032 with an anticipated dwelling capacity of 6,600.[2] This was a clear signal to landowners, infrastructure providers and potential developers that the Riverhead FUA will be rezoned for urban purposes. For instance, a private plan change was lodged to rezone approximately 80.5 hectares of land from future urban zone to a mix of residential zones.[3] It is important that the Council be aware of the levels of investment that have been made based on these decisions and the exposure the Council would hold if it reversed the settings for the Riverhead FUA at this stage. Best Berries has made significant financial and investment planning decisions based on the existing FULSS and FUZ indications.

5. IMPLEMENTATION AND PHASING

5.1 The FDS, in addition to the partial removal of the Riverhead FUA, proposes that whatever portion of the Riverhead FUA that remains only be released for development in "2050+". This level of delay is unreasonable, unjustified and would put the remaining Riverhead FUA into a decades long holding pattern that severely limits its landowners' rights.

5.2 The only explanation provided in the FDS for this 18-22 year delay from the current FULSS phasing is that "*Transport infrastructure is not planned to support development before 2050+*". We note that this is erroneous as the State Highway 16 safety improvement programme is scheduled to be completed within the more immediate future.

5.3 If the reference to "transport infrastructure" instead relates to the proposed works to implement the urbanisation of Riverhead Road and the Coatesville-Riverhead Highway, we note that the Infrastructure Funding and Financing Act 2020 provides a mechanism specifically designed to allow private funding to bring forward development infrastructure where public funding is not available

[1] Report to Auckland Council Hearing topic 028 Future Urban Zone July 2016 p 7.
[2] Auckland Future Urban Land Supply Strategy July 2017 p 18
[3] Future urban areas evidence report – for consultation June 2023 p 36.

sooner. These developer-led opportunities should not be discounted or foreclosed by planning and regulatory decisions.

6. FURTHER INFORMATION

6.1 Should the Council require any further information regarding the information set out in this submission or should it determine that the Council would benefit from engaging with Best Berries' experts, Best Berries confirms it would welcome, and expects to be included in, further discussions on the Riverhead FUA.



_____

[redacted]

Signed on behalf of Best Berries (NZ) Limited

31 July 2023

Electronic address for service of submitter:

[redacted]

[redacted] [redacted]

APPENDIX A: STORMWATER ENGINEERING REPORT FROM MCKENZIE & CO

#8156

#8156

ASSESSMENT OF STORMWATER AND FLOODING CONSTRAINTS

RIVERHEAD PROPERTIES

BEST BERRIES (NZ) LTD

MCKENZIE & CO.

DOCUMENT CONTROL RECORD

PROJECT: Sustainab e Deve opment and Stormwater Management

CLIENT: Best Berries (NZ) Ltd

PROJECT LOCATION: Riverhead

Revision	Date	Originator	Checker	Approver	Description
A	20/06/23	JDK	RR	CM	DRAFT
B	20/07/23	JDK	RR	CM	ISSUE
C	31/07/23	JDK	RR	CM	FINAL

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3. Future urban areas proposed for removal, either partially or entirely 1

4. 30 Cambridge Road, Riverhead 2

5. Council supplied information 2

6. Significant Hazard Constraints – areas for further investigation 7

7. Conclusion 9

Engineering drawings attached separate y

1. INTRODUCTION

I have been instructed to prepare this engineering assessment in response to the proposed removal of portions of the Kumeū-Huapai-Riverhead Future Urban Area (FUA) by Auckland Council as outlined in its draft Future Development Strategy 2023-2053 (FDS). In undertaking this assessment, I have visited the subject site and reviewed recent expert stormwater technical assessments prepared by independent consultancies in support of plan change and consent applications for the site. I have also undertaken an independent assessment of the stormwater constraints, including supporting technical material, identified in Auckland Council's draft FDS.

I am a Chartered Professional Engineer, and a Director of McKenzie & Co Consultants Ltd with over 20 years experience.

Having considered the assessments contained in the FDS and its conclusion the FUA is significantly constrained by natural hazards, it is evident these assessments do not appear to represent the actual site conditions, and exaggerate the extent of the floodplain, through the extent of the proposed removal of the FUA. It is therefore considered that the risks outlined are overstated and fail to consider the practical and feasible solutions that can easily address these concerns safely, sustainably, and effectively as part of any standard land development process. Excluding this land from the FUZ may also reduce practicable/efficient development options for stormwater catchment management for the wider catchment.

2. LAND PARCELS IN ASSESSMENT

The following land parcels are included in this submission –

1) LOT 1 DP 499822 - 30 Cambridge Road
2) Pt Lot 2 DP 4818 - 340 Riverhead Road
3) Lot 1 DP 61985 - 1140 Coatesville-Riverhead Highway

These properties are all currently zoned Future Urban Zone

3. FUTURE URBAN AREAS PROPOSED FOR REMOVAL, EITHER PARTIALLY OR ENTIRELY

The FDS indicates in Appendix 7, page 30 and in Figure 37, page 43 (solid black hatching) an area in of FUZ in Riverhead recommended for partial removal. The partial removal is based on the following statement:

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

Parcels within the Kumeu-Huapai-Riverhead FUZ that fall ***entirely or mostly*** *within this floodplain*

extent are considered unsuitable for development due to limited appropriate land uses".

4. 30 CAMBRIDGE ROAD, RIVERHEAD

30 Cambridge Road sits within the area identified in the FDS for partia remova from the Riverhead FUA. Figure 1 :LOT 1 DP 499822.

Counci GIS has some f ood p ain shown over this property, which we have measured is approximate y 40% of the site. Given this doesn't fa under the definition of *…entirely or mostly within this floodplain …"* we do not view this property as being unsuitab e for deve opment. Some of the areas of the site that are under the f ood p ain can a so be assessed further, as to their suitabi ity for deve opment.

This indicates the areas of the Riverhead FUA having a 'f oodp ain extent' on the Auck and Counci mapping system having imited appropriate and uses, particu ar y in the case of 30 Cambridge Road. The Counci 's characterisations of this area are incomp ete and fai to account for practica and feasib e potentia methods for imp ementing effective and sustainab e stormwater management infrastructure. Incorporation of suitab e stormwater management measures to enab e these parce s to be uti ised for future urban deve opment is considered practicab e and readi y avai ab e to address the existing f oodp ain constraints. Remova of this parce from the Riverhead FUA wou d ike y compromise the abi ity to masterp an and deve op an overa catchment so ution for stormwater management.

5. COUNCIL SUPPLIED INFORMATION

Figure 1 i ustrates the portion of the Riverhead FUA recommended for remova on the basis the Counci 's desktop ana ysis indicates there are f oodp ain hazards shown as a b ack pixi ated hatch) covering approximate y 80% of 30 Cambridge Road.

As noted above, the 1% Annua Exceedance Probabi ity (AEP) f ood footprint has been extracted from Auck and Counci 's GIS mapping and is superimposed in ight b ue. This indicates approximate y ha f the coverage (40% of the site) and traverses a we -defined ow- ying area a ong the western portion of the site.

Auck and Counci 's GIS a so shows a transmission ines traversing across the western edge of the site. These overhead transmission ines appear to be ocated within the 1% AEP f oodp ain and are a significant distance from any potentia deve opab e areas within 30 Cambridge Road.

It shou d be noted, during the 1% AEP event, the f oodp ain depicted in the GIS comprises two sources of water:

- F oodwaters originating from the neighbouring stream, which appear to exhibit sha ow sheet f ow characteristics.
- Loca over and f ow paths originating from both upstream and within 30 Cambridge Road.

The f oodwaters from the stream seem to sheet f ow across the southwestern corner of the site. However, the f ows appear to be within manageab e ranges, and cou d be managed through one of severa on-site management methods to prevent f ooding and/or improve downstream conditions. The f ood f ows genera y a ign with the over and f ow paths represented by b ue

arrows.

The and contours indicate minima storage capacity in this particu ar area of 30 Cambridge Road. Consequent y, water is primari y conveyed over the site rather than being stored on-site.

A noteworthy feature identified in this assessment is the presence of overhead transmission power ines. Under norma deve opment conditions, new residentia structures and bui dings are genera y to be avoided within the Nationa Grid Corridor. Thus, the area designated as "f oodp ain" cou d present an exce ent opportunity for conveyance and/or storage during 1% Maximum Probab e Discharge (MPD) f ood events, potentia y reducing downstream f ood hazards. Given this portion of the Riverhead FUA is not deve opab e for sensitive and uses such as residentia , regard ess of the presence of a f oodp ain, we consider the corridor to be a potentia over and f ow path feature or possib e 1% AEP storage/mitigation ocation.

P ease refer to Figure 2 be ow, which i ustrates the entry and exit points of the over and f ow paths on the site, denoted by b ue ines. The f oodp ain's entry point is indicated by so id red arrows, whi e the potentia rea ignment of over and f ows beneath the HV power ine is out ined in red.

Additiona y, an indicative road network is disp ayed in grey, suggesting that it cou d a ign with the over and f ow paths, if necessary, eading to sma , protected areas on the site.

CKL flood model

CKL Consu tants have deve oped a f ood mode to support the Riverhead Landowner Group's proposed Riverhead South private p an change. We have reviewed this mode against our assessment above. This mode provides a more detai ed representation of the f ood p ain when compared to the Counci 's GIS mode ing and is based on site-specific data. According to their findings, the identified hazard constraints can be addressed through the imp ementation of suitab e stormwater management measures and the incorporation of appropriate infrastructure.

Figure 2, reinforces the Counci 's mode ing resu ts, indicating that the f ood p ain is re ative y sha ow and primari y contained within the over and f ow path routes. By safeguarding existing streams, wet ands, over and f ow paths, and site contours, future residentia areas can be provided for and situated outside the f oodp ains. These measures are particu ar y significant when considered within the broader deve opment context, as depicted in Figure 3.

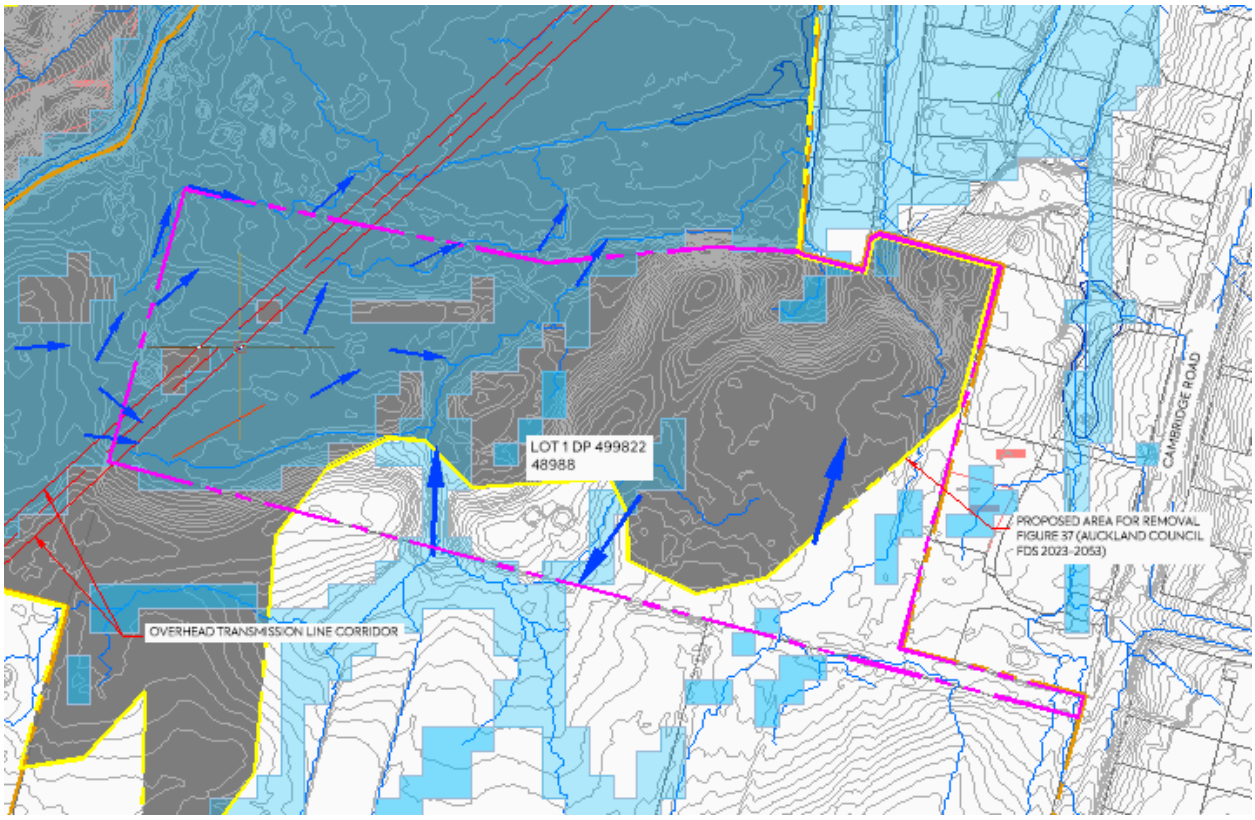


Figure 1 – FUZ area recommended to be removed (Shown in Black) due to floodplain Hazard, vs the Floodplain from GIS. HV overhead lines shown as red dashed line.

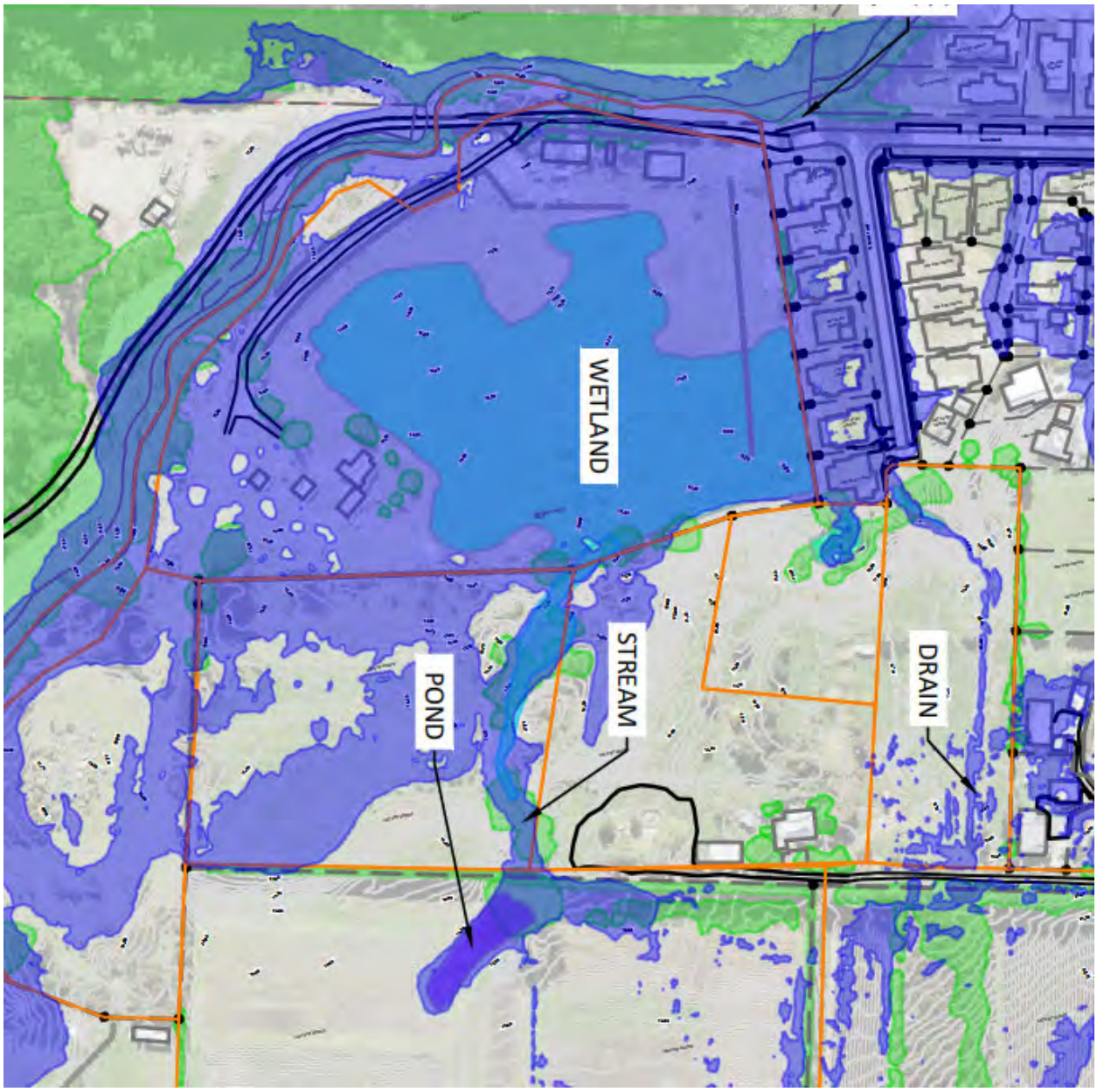


Figure 2 – 100 year MPD , Stormwater management and flood risk assessment, 2022, CKL.



Figure 3 – Master plan with OLFP overlaid, Stormwater Management & Flood assessment report, CKL 2002.

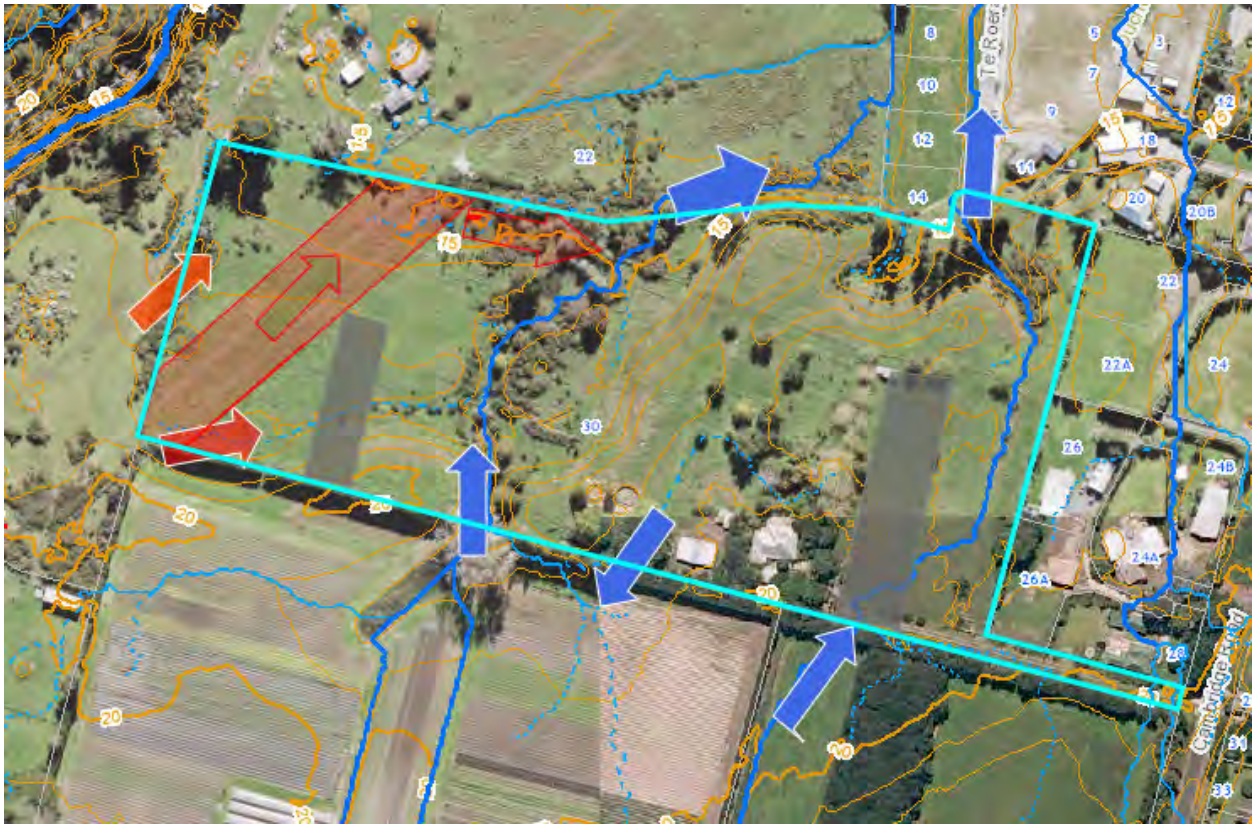


Figure 4 – Overland Flowpath locations. Overhead HV power lines shown in Red

We have undertaken our own high- eve assessment to check the % of the site covered by f oodp ain. This p an is attached in Appendix A. The p an confirms that the site is in fact covered approximate y 40% f ood p ain, whereas 80% of the site is proposed to be removed from FUZ zoning.

The site has we -defined streams and over and f ow paths, and as such we be ieve that the site is entire y suitab e for residentia deve opment, provided the appropriate stormwater infrastructure is in p ace.

In my opinion the Counci shou d re-eva uate the proposed remova of the Riverhead FUZ based on these findings. Contrary to the draft FDS conc usion, I consider the potentia for successfu deve opment through the imp ementation of effective stormwater management infrastructure. This approach wi a ow the uti ization of the and for appropriate and sustainab e purposes, such as residentia or commercia deve opment, whi e ensuring the safety and we -being of the community. More detai ed stormwater mode ing at the time of Resource Consent app ication wi be required, to demonstrate effects of any proposed deve opment on downstream properties and infrastructure.

6. SIGNIFICANT HAZARD CONSTRAINTS – AREAS FOR FURTHER INVESTIGATION

This report a so covers Pt Lot 2 DP 4818 - 340 Riverhead Road & Lot 1 DP 61985 - 1140 Coatesvi e-Riverhead Highway.

These properties are shown in Figure 5, and the figure is over aid with the 1% AEP event, from the Auck and Counci GIS.

Page 34 of the FDS document, states that -

Moderate hazard constraints. relating only to approximately 15% of the FUA being exposed to the 1% AEP flood plain, mostly along the northern boundary associated with a tributary of the Rangitopuni Stream but also other patches through the centre of the FUA."

It shou d be noted that most of these areas, which we have identified in Figure 5, are oca ised ponding areas, and not f ood p ain"". These areas represent a tota of approximate y 5% of the tota deve opment area.

This is we within standard parameters of any potentia site for and deve opment, and through re-contouring to suit deve opment, any oca ised ponding areas wou d be removed.

As with Section 4, a stormwater management and f ood assessment has been prepared which considers a masterp an. This p an considers and mitigates against these hazards, and it is expected that this p an reasonab y mitigates the moderate hazard mentioned. Figure 6 shows the proposa to mitigate the hazards, through the use of stormwater devices designed in accordance with Auck and Counci s GD01.

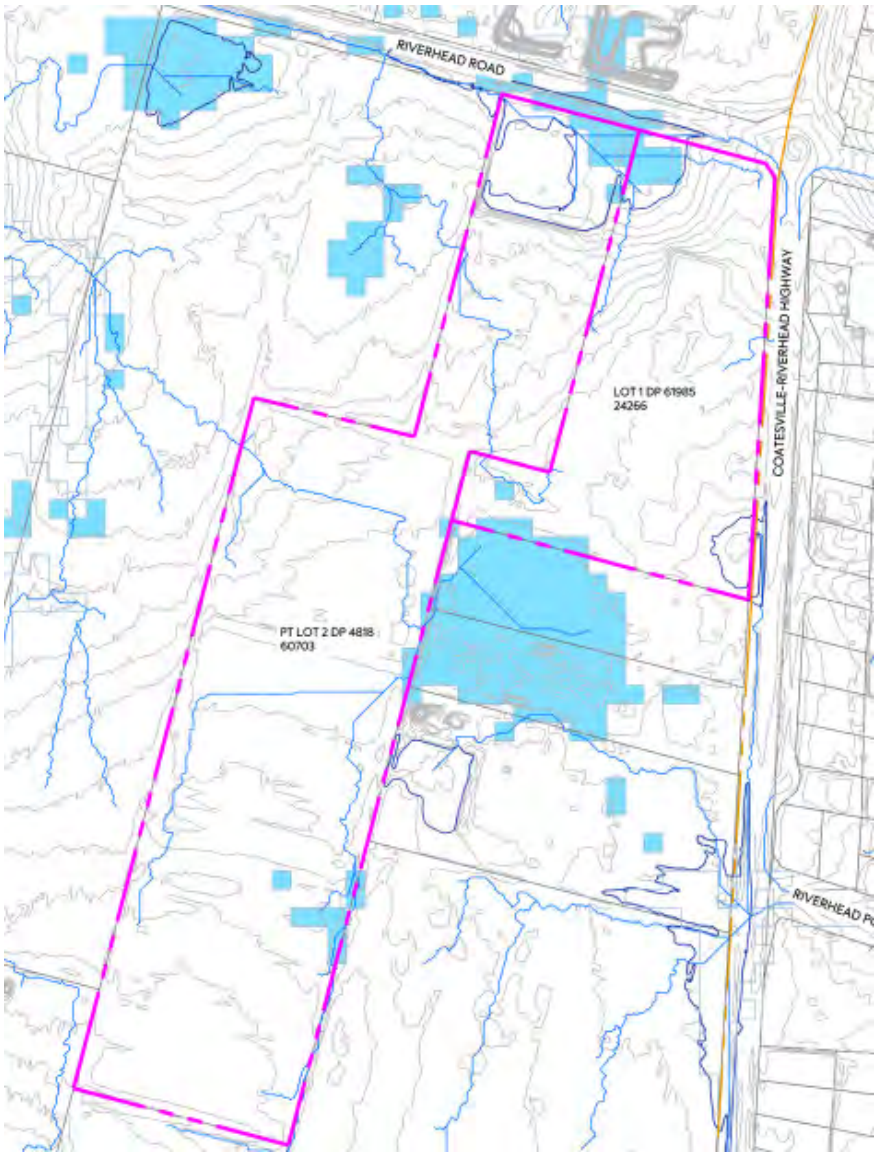


Figure 5 - Areas shown as 'further investigation" due to Natural Hazards.

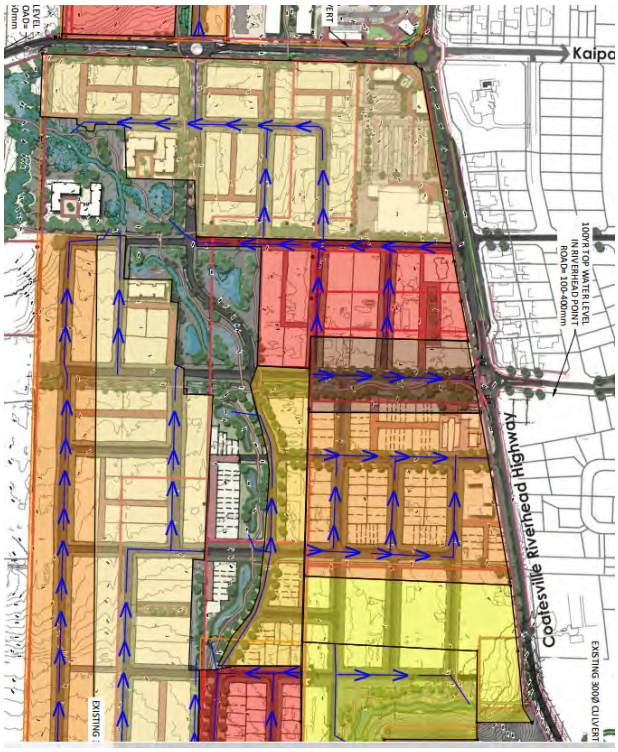


Figure 6 - Masterplan, stormwater corridor and overland flowpaths

7. CONCLUSION

In conc usion, I have not been ab e to find any technica support for the Counci 's conc usions with respect to 30 Cambridge Road, to remove approximate y 80% of the FUZ zoning from the site, based on on y 40% of this site being affected by f oodp ain of various depths. I further add, my own assessment, CKL's technica evidence to support the conc usion that stormwater issues cou d be readi y and easi y addressed for this site in any future urban deve opment and wou d in fact provide a practica and usefu addition to catchment management p anning overa . A detai ed assessment can be addressed through the consenting and detai ed design stages.

Our assessment contradicts the FDS recommendation of remova of 80% of the site from FUZ zoning, for the Kumeu -Huapai-Riverhead area based *Parcels within the Kumeu-Huapai-Riverhead FUZ that fall* ***entirely or mostly*** *within this floodplain".* Our findings indicate whi e some f oodp ain does exist, we consider a majority of the site is suitab e for residentia deve opment with the imp ementation of standard stormwater infrastructure. From a stormwater perspective, a f oodp ain in itse f is not a reason to remove FUZ zoning. A detai ed assessment can be addressed through the consenting and detai ed design stages.

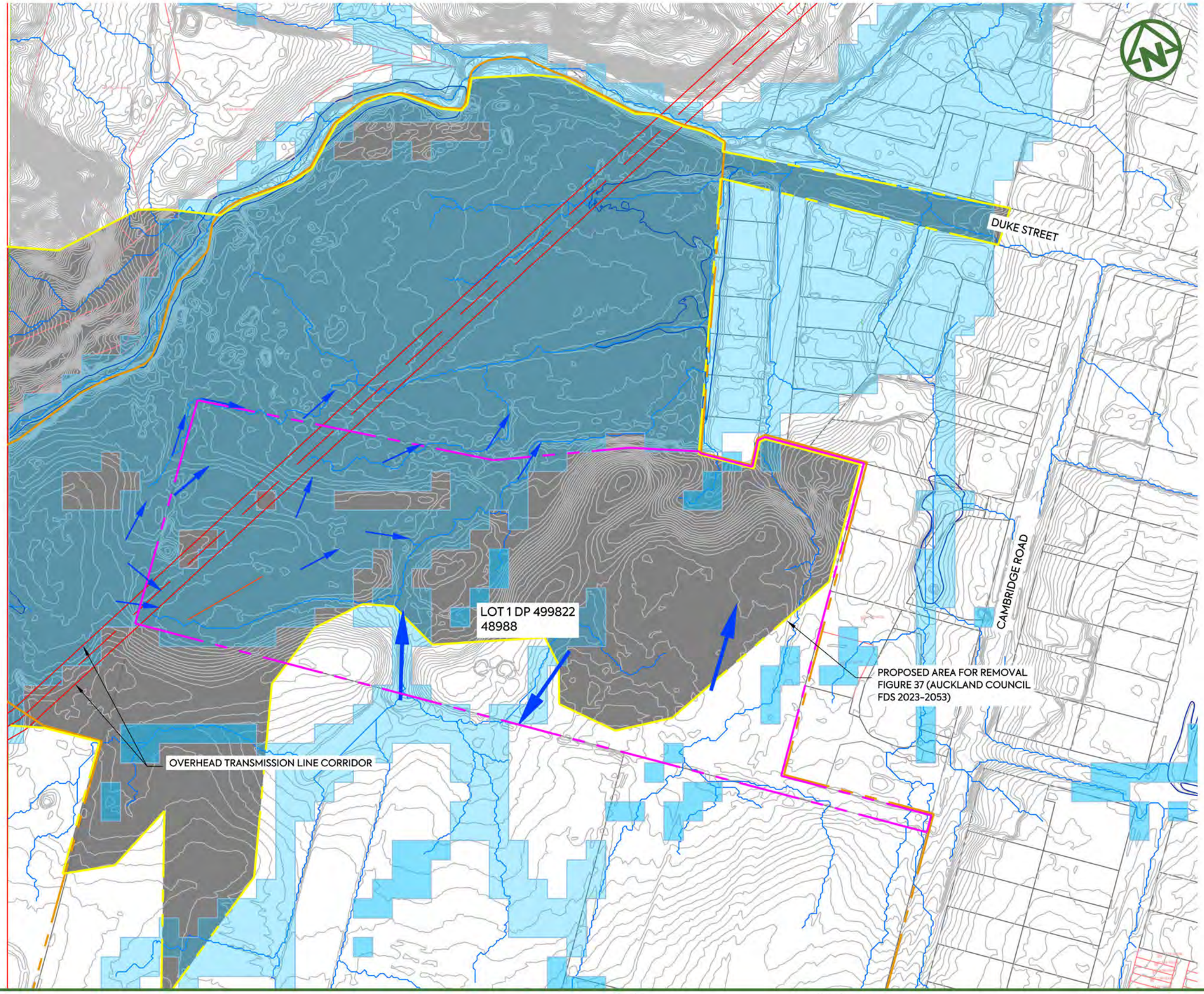
We recommend Counci reassess the proposed remova and consider the potentia for successfu and safe deve opment in ine with effective stormwater management practices.

In regards to 340 Riverhead Road & 1140 Coatesvi e-Riverhead Highway, this report high ights the presence of oca ized ponding areas within the deve opment sites, which can be effective y mitigated through appropriate stormwater management measures, a owing for safe and feasib e and deve opment.

#8156

NOTES:

1. TOTAL AREA OF LOT DP 499822 IS 4.9 Ha.
2. GIS OVERLAND FLOWPATH AREA WITHIN LOT DP 499822 IS 2.0 Ha (40.1% OF TOTAL SITE AREA).
3. PROPOSED AREA FOR REMOVAL FIGURE 37 (AUCKLAND COUNCIL FDS 2023-2053) WITHIN LOT DP 499822 IS 3.84 Ha (78.4% OF TOTAL SITE AREA).



LEGEND:

- OVERALL FUA BOUNDARY
- FUA – AREA PROPOSED FOR REMOVAL
- LOT BOUNDARY (30 CAMBRIDGE ROAD)
- EXISTING (1.0m) CONTOUR — 62.0
- CADASTRAL BOUNDARY
- 100-YEAR FLOODPLAIN (AUCKLAND COUNCIL GIS)
- OVERHEAD TRANSMISSION LINE
- PROPOSED REMOVAL AREA (FDS)
- 1% AEP FLOW ARROWS (INDICATIVE GENERAL DIRECTION)

CLIENT:

MCKENZIE & CO.

PROJECT:

30 CAMBRIDGE ROAD
RIVERHEAD

TITLE:

AUCKLAND COUNCIL
GIS OVERLAY
PLAN

PURPOSE OF ISSUE:
FOR DISCUSSION

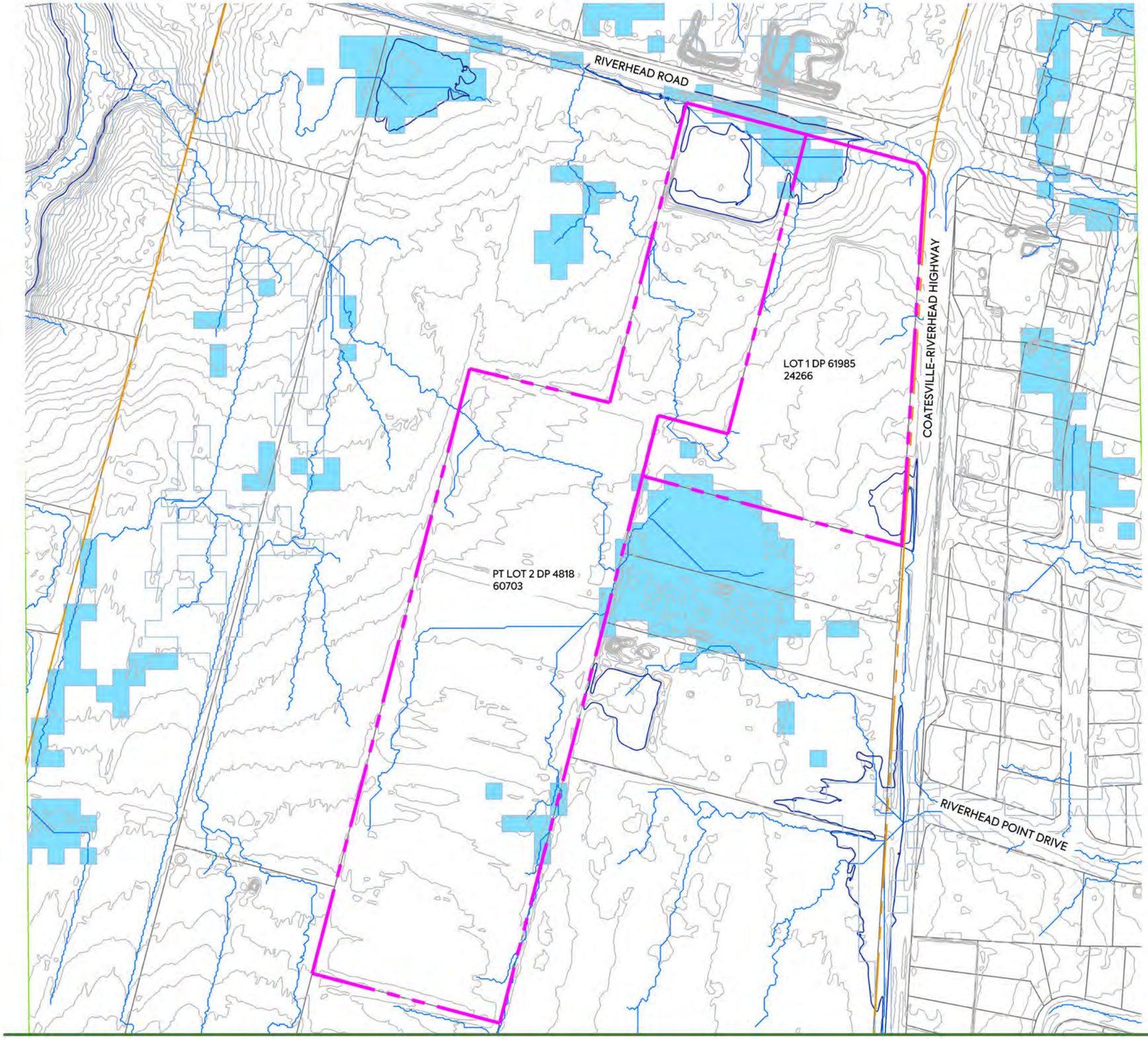
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REV: A

REV	DESCRIPTION	DRN BY	CHK BY	APP BY	DATE
A	FIRST ISSUE	SS	RR	JDK	16/06/23

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#8156



LEGEND:

- OVERALL FUA BOUNDARY
- FUA – AREA PROPOSED FOR REMOVAL
- LOT BOUNDARY (30 CAMBRIDGE ROAD)
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- 100-YEAR FLOODPLAIN (AUCKLAND COUNCIL GIS)
- OVERHEAD TRANSMISSION LINE
- PROPOSED REMOVAL AREA (FDS)
- 1% AEP FLOW ARROWS (INDICATIVE GENERAL DIRECTION)

CLIENT:

MCKENZIE & CO.

PROJECT:

340 RIVERHEAD ROAD AND
1140 COATESVILLE-RIVERHEAD
HIGHWAY, RIVERHEAD

TITLE:

AUCKLAND COUNCIL
GIS
PLAN 2

PURPOSE OF ISSUE:

FOR DISCUSSION

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DRAWING NO: 3417-901

REV: A

REV	DESCRIPTION	DRN BY	CHK BY	APP BY	DATE
A	FIRST ISSUE	SS	RR	JDK	16/06/23

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Future Development Plan 2023 #8160

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

Your feedback

Focusing growth

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

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

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

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

Other

Tell us why

Refer to the attached submission prepared on behalf of NZ Agrihub Limited.

Accessible local centres

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

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

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

Other

Tell us why

Refer to the attached submission prepared on behalf of NZ Agrihub Limited.

Avoiding hazards

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

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

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

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

Other

Tell us why

Refer to the attached submission prepared on behalf of NZ Agrihub Limited.

Resilient infrastructure

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

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

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

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

Other

Tell us why

Refer to the attached submission prepared on behalf of NZ Agrihub Limited.

Other feedback

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

Refer to the attached submission prepared on behalf of NZ Agrihub Limited.

Saddleback
Strategy | Planning | Design

31 July 2023

Submission on

The Draft Future Development Strategy

On behalf of: NZ Agrihub Limited

Attention:	
Auckland Council	futuredevelopmentstrategy@aucklandcouncil.govt.nz

Introduction

This is a submission on the draft Future Development Strategy **(FDS)** on behalf of NZ Agrihub Limited **(NZ Agrihub)**. The FDS was notified for submissions on 6 June 2023.

Auckland Council **(Council)** is required to prepare an FDS in accordance with subpart 4 of Part 3 of the National Policy Statement on Urban Development 2020 **(NPSUD)**.

CLOC is supportive of the response to growth within Auckland being led by an FDS prepared in accordance with the requirements of the NPSUD. However, CLOC has concerns with the draft FDS as set out in this submission.

This submission has three parts:

Commentary on the Strategic Spatial Framework of the FDS;

Commentary on timing of infrastructure outlined in the FDS; and

1. A request that the Rural Mixed-Use Zoned land north of Ararimu Road, bound to the east by State Highway 1 and west by Great South Road (the Ararimu Road site), is identified as future business land.

Part 1: Sufficient Supply of Development-Ready Land: FDS Strategic Spatial Framework (Page 15)

Ensuring that there is sufficient development capacity for business and housing is a key purpose of an FDS under Clause 3.15.

Land supply is a central aspect of ensuring sufficient development capacity for industrial land, as it enables opportunities for high-value businesses to grow and employ more people. Economic development of the region may be constrained if the FDS is not prepared properly, with negative consequences for the New Zealand economy as a whole.

There are two primary areas of concern:

1. Existing Capacity

Section 1.2.4 (Page 6) details that the FDS builds on the previous iterations and replaces the 2018 Development Strategy yet no commentary or analysis about performance (theoretical verses v actual land releases) against the development targets has been provided. Based on this, does Auckland have sufficient capacity for previously forecast growth currently?

It would be helpful if this section set out the number of homes and jobs that have been established within the FUZ since Future Urban Land Supply Strategy 2017 (FULSS) was adopted, and how that compared with the FULSS sequencing.

NZ Agrihub therefore disagrees with:

the statement within Principle 5(c) (page 23) that *"The future development strategy identifies there is sufficient residential and business development capacity across Tamaki Makaurau".* No justification has been provided to support this statement, and is certainly at odds with market demand indicators for the industrial sector.

2. Development-Ready Land

The over-arching challenges (Section 2.3, page 12) clearly articulate that *"an uncertain and changing environment"* (Section 2.3.1), seeking to halt *"the ongoing degradation of the natural environment"* (Section 2.3.2) and financial constraints to infrastructure growth (Section 2.3.4) have materially impacted the supply of developable residential and commercial land – as evidenced by the proposal to remove some planned areas (see Figure 13, page 41) from 'Future Urban Area' allocation.

Such an indication raises serious questions over the assumptions underpinning growth modelling as to the rate at which areas indicated for future land uses can actually be converted to 'development-ready' land. Furthermore, other assumptions that underpin development capacity modelling needs to be reviewed include:

- The construction and finance industry's capacity to deliver projects of scale, and;

- Consenting ramifications in light of the principles (Section 2.5, page 15) being proposed to guide future development.

Therefore, in light of the restriction placed on land supply, NZ Agrihub agree with the statement in Section 2.3.4 (Investing in Infrastructure in a financially constrained environment) that: *"There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years."*

This being the case, Council should:

1. Be clear that the overarching objective is to maintain an adequate supply of developable commercial land; and,

2. Clarify that infrastructure investment is not necessary in some circumstances.

This submission therefore recommends that subheading in Section 2.3 "*Over-arching Challenges*" be amended as follows:

2.3.1: "~~Spatial planning~~ **Maintaining an adequate supply of development ready land in an uncertain and changing environment"**

2.3.4: "~~Investing in~~ **Provision of infrastructure in a financially constrained environment"**

We also seek that Section 2.4 "Spatial outcomes" includes an initial dot point: **"Tamaki Makaurau has an adequate supply of development ready land."**

Part 2: Timing of Infrastructure

NZ Agrihub agrees with the statement in Section S2.3.4 (Investing in Infrastructure in a financially constrained environment) that *"There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years."*

As detailed previously, Figure 13 identifies parts of the FUZ that have either been removed or are under investigation. This requires, as a minimum, some high-level commentary and explanation. For example, what proportion of the land that has been removed was allocated for housing, and what proportion was allocated for jobs?

Principle 5 (Enable sufficient capacity for growth in the right place at the right time – page 25) acknowledges that it is difficult to estimate where and when growth is likely to occur given the NPSUD requirement for Councils to be responsive to out-of-sequence development.

Other considerations raised are:

- Funding and financing pressures have increased (2.3.4, page 13).

- Smaller, distributed and nature-based infrastructure solutions (2.4.4, page 14) are largely untested and therefore challenging to get approved.

- A coordinated approach between agencies tasks with delivering the infrastructure is increasingly challenging (Principle 3, page 19).

This highlights the need for Council to be less rigid with both sequencing, but also how infrastructure can be funded. Private/public infrastructure agreements and targeted rates are potentially good solutions to ensuring that Council's infrastructure budgets aren't impacted by out-of-sequence development. This could be acknowledged in *Principle 5a: Direction for where and when growth is appropriate* (page 23).

This being the case, Council should be receptive to:

3. Out-of-sequence development where there are solutions to infrastructure provision, and;

4. Alternate methods of funding approaches enabled through the Infrastructure Funding and Finance Act 2020 (IFFA) and other private sector led initiatives.

This submission therefore recommends that following statements in Principle 5a (Directions for where and when growth is appropriate, page 23) should be revised:

> *"Unanticipated or out-of-sequence development create[s] major funding challenges for the Council, where funding of the necessary infrastructure has not been provided by other parties or means."*
>
> *Consideration of the trade-offs and costs that might occur when development occurs out-of-sequence, ahead of existing priorities, will be applied. For example, Council will support out-of-sequence development where funding for infrastructure can be secured via alternative means."*
>
> *Principle 5(b): Add final sentence: "However, Council could support development outside of urban areas where, for example, the natural environment is protected and a compact urban form can be achieved."*

Part 3: Rationale for Including the Ararimu Road Site

While large tracts of Auckland are rural (detailed in Section 4.2.3, *Rural Areas*, page 42), given the uncertainty and planned shrinkage of the FUZ, Council should be open to future plan change applications within the Rural Zone that meet the strategic objectives. These include:

- Can be designed to avoid risk from natural hazards;

- Protect/maintain the natural environment;

- Do not materially reduce the productive capacity of the region;

- Minimise adverse effects on rural character; and
- Are adjacent to existing FUZ/urban areas and/or key transport routes.

At the same time Section 4.2.4 (Business areas – *Greater access to employment,* page 46) notes that 46% of jobs are located in and around South Auckland.

This is without doubt a function of proximity to the international Airport, heavy rail infrastructure and another large population to the south in Waikato (Hamilton and surrounding areas). Therefore, these areas will continue to attract more demand for business than other parts of Auckland.

The Ararimu Road site

The Drury-Opāheke area, immediately north of the site, is identified as short-medium term priority (years 1-10) in Section 4.2.5 (Prioritising areas for development, page 50) and *Way forward*, (page 51). Figure 18 also recommends that, given the market demand, current activity in the area and good links to transport infrastructure, the FUZ land bounded by SH 1 to the east and Great South Road to the west are included in the Spatial Priority for investment (Years 1-10).

Neither of these recommendations are reflected in Figure 13, where the timing of release in these in these areas is identified as 2035+. Figure 13 needs to be corrected accordingly.

Given these factors, and the planned growth of business land surrounding the site (see Figure 16) in the Drury/Ramarama area expansion of the "Future Business Area" south must be considered.

While this land is currently zoned Rural-Mixed Use, it has a number of factors which indicate an ability to accommodate higher and better land uses, including commercial/industrial development:

- Land tenure is already heavily fragmented into smaller titles, making rural activity less commercially viable.
- There are a range of uses across the area and none of which appear to be highly productive.
- The proximity to a SH1 interchange (Ramarama).
- Excellent current (Great South Road) and planned transport links that will limit congestion and associated vehicle emissions.
- The additional business land can provide employment opportunities for residential areas nearby, opposite State Highway 1.

Structure Plan-Led Development

The FDS is aiming to build an "*integrated strategic approach for resilient urban, future urban, rural and business environments, that protect and restore the natural environment and make best use of infrastructure and scarce funding*" (Section 1.1, page 4)

Structure (or Framework) Plans are widely acknowledged as the best method to achieve this as they detail what needs to be achieved irrespective of underlying land ownership.

The area immediately north the of the existing metropolitan urban limit **(MUL)** boundary in Runciman, between Great South Road and the southern motorway, has been indicated for Business – Light Industrial. However, the delineation of the MUL in this location is difficult to fathom and appears to lack a compelling rationale (i.e. no 'defensible edge') and the planned Mill Road to Pukekohe Arterial Road traverses south of the MUL.

It should be noted that roads (like Great South Road) do not perform as 'defensible edges' as development will naturally gravitate to infrastructure corridors and transport routes (infrastructure-enabled development).

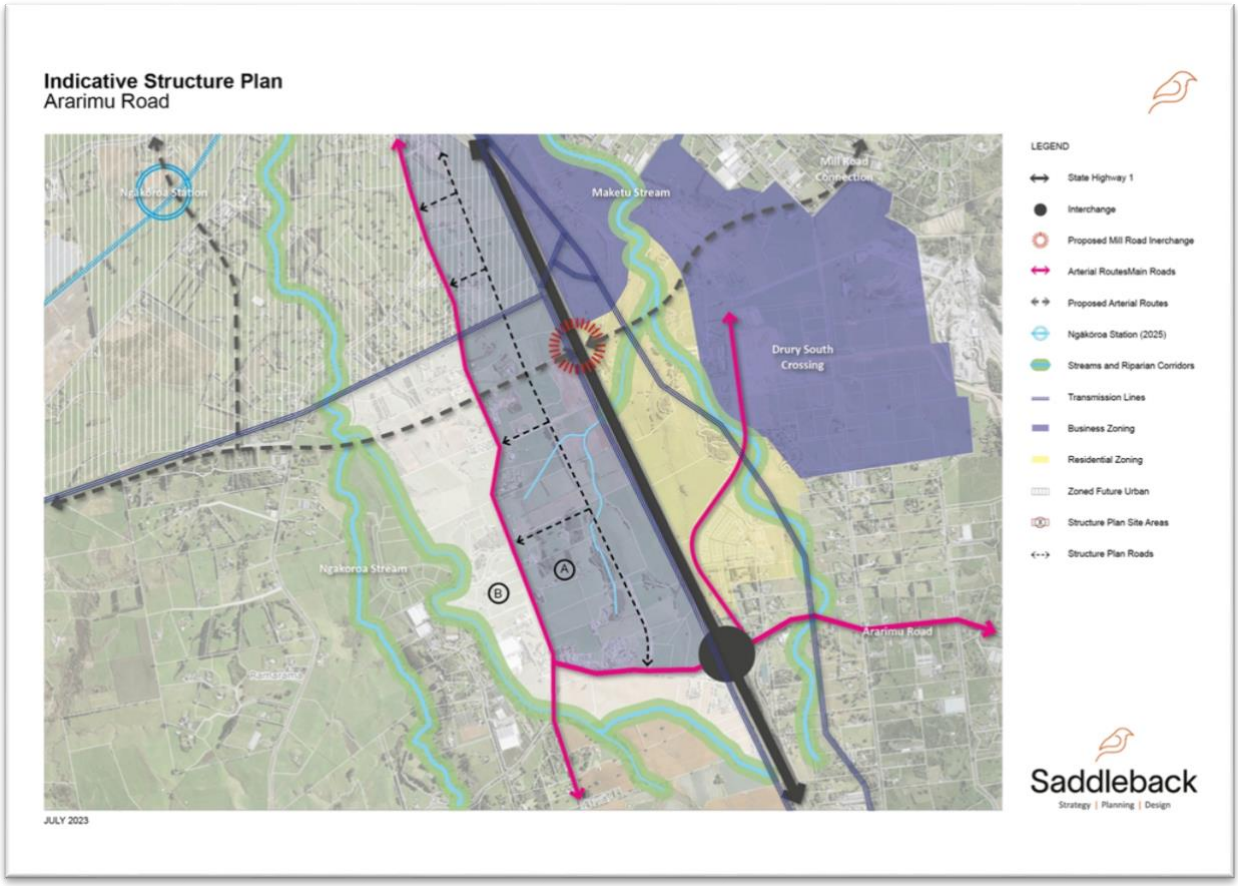
A defensible edge (from an urban design perspective) is established by natural watercourses and associated riparian margins, which in this case is the Ngakoroa Stream to the west, and main tributaries to this in the south.

This creates a fully-contained area of land which needs to be considered as Runciman South. Within this there are two land-use areas which naturally attract certain land uses:

A. Business/Light Industrial – due to the area sloping down to the motorway, ease of access to main arterials and presence high-tension power lines.

B. Business/Other – due to proximity to natural watercourses (and pedestrian/cycle paths anticipated for these)

Although Area A features the upper end of a tributary of the Te Maketu Stream (located on the eastern side of the motorway) it is a landscape feature 'within' the area, and not a divider of it. As such it can be assimilated within the design/ development of the area.



By starting with a focus on protection and restoration of key natural features, and assuming a low-impact engineering approach (including modal shift initiatives) a simple Structure Plan ca n be developed which:

- Provides for a significant area of future Business/Light Industrial (and other uses),
- Optimises the utilisation of existing and planned infrastructure – relieving pressure on scarce funding, and;

Consequently, Inclusion of the area detailed can deliver an integrated strategic approach sought by the FDS, provided for a range of sought after land uses in an appropriate areas and relieve pressure on other less suited urban development areas.

Recommendations and Requests

This submission therefore recommends that:

1. The area north of Ararimu Road, bound to the east by State Highway 1 and west by Great South Road be included into Figure 16 and 18; and,

2. That an avenue to accept private plan changes on rural land be provided for.

We request to be heard and be involved in further consultation in relation to this submission.

Kind regards,



Joe Gray

Principal Urban Planner
Saddleback Planning Limited



Bruce Weir

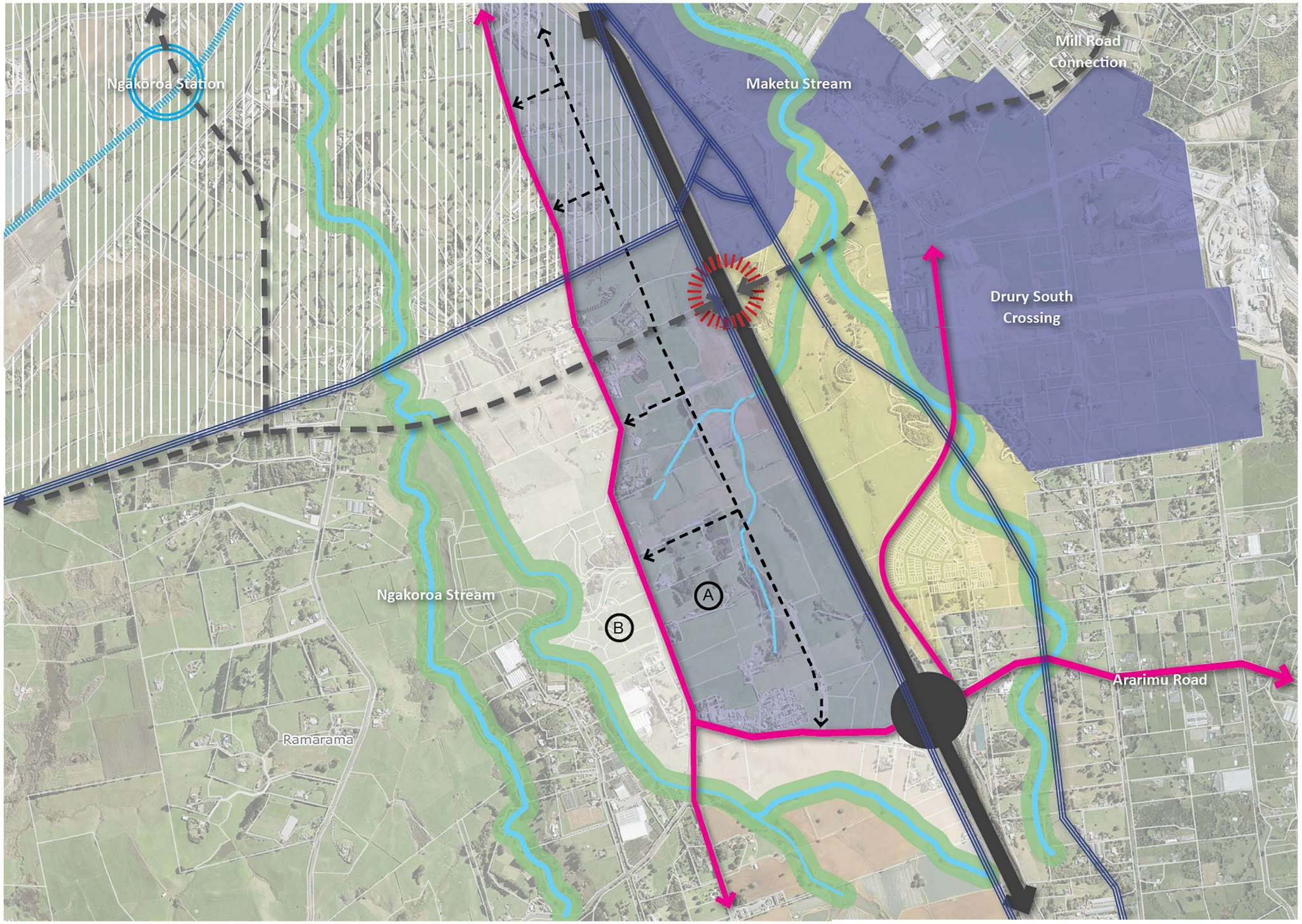
Principal Urban Designer
Saddleback Planning Limited

Appendix 1:

Indicative Structure Plan (NZ Agrihub)

#8160

Indicative Structure Plan
Ararimu Road



LEGEND

- State Highway 1
- Interchange
- Proposed Mill Road Inerchange
- Arterial RoutesMain Roads
- Proposed Arterial Routes
- Ngākōroa Station (2025)
- Streams and Riparian Corridors
- Transmission Lines
- Business Zoning
- Residential Zoning
- Zoned Future Urban
- Structure Plan Site Areas
- Structure Plan Roads

Saddleback
Strategy | Planning | Design

JULY 2023

Future Development Plan 2023 #8161

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

Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

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

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?

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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.

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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?

Other

Tell us why

Other feedback

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

#8161

31 July 2023

Auckland Council

Email: futuredevelopmentstrategy@aucklandcouncil.govt.nz

Draft Auckland Future Development Strategy 2053 Submission

1. Spark, Chorus, One NZ (formerly Vodafone), Connexa and FortySouth welcome the opportunity to submit on the Draft Auckland Future Development Strategy 2053 ( ).

2. We wish to be heard in support of this submission.

Executive submission

3. We support the draft FDS, the prioritisation of development areas supported by public transport corridors and an improved public transport system. The focus as seen in principles 3 and 5 on aligning land use, and infrastructure that enables investment in the networks and projects that will support Tāmaki Makaurau.

4. Telecommunications is a critical infrastructure providing digital services essential to well-functioning urban and rural environments. We are concerned that the draft FDS does not really comprehend the importance of infrastructure such telecommunications and electricity to Tāmaki Makaurau and supporting the growth outcomes. The need for infrastructure integration is highlighted in various parts of the draft FDS such as in 3.*13 Key Themes* but this seems to refer to infrastructure that is publicly controlled.

5. We look forward to continuing work with Council staff on developing the framework for Council communication, working with infrastructure/network utilities to undertake more detailed infrastructure planning and explore the range of funding options available.

6. We support the TCF submission.

Telecommunications – critical infrastructure

7. Telecommunications providers (refer to Appendix 1) deliver critical communications infrastructure that connects communities, underpins key economic and social objectives and is a critical part of our response to climate change. Communications providers invest over $1.5 billion every year to maintain existing services, add capacity and resiliency to existing networks and connect new communities. Some of the investment relates to the cost of relocating existing cell-sites because of the increasing densification of urban areas.

8. In parallel, Spark, and One NZ are currently rolling out new 5G mobile networks, deploying over 1,000 new mobile sites and extending network coverage to regional communities. Connexa and FortySouth are essential partners in building the mobile network infrastructure. Chorus as a wholesale only provider of broadband services over fibre optic and copper networks. In late 2022 Chorus completed the final stage of the Ultrafast Broadband network build with fibre services now available to 87% of New Zealand addresses. Demand for fibre services continues to grow and Chorus recently connected their one millionth address to fibre. Chorus continues to expand its fibre network in urban and small rural settlements. Continuous network technology upgrades are needed to keep up with the increasing demand from consumers and businesses – exponential growth in the use of data is continuing and each year the amount of data handled by telecommunications networks roughly doubles. Chorus, Spark, One NZ, FortySouth and Connexa, along with other telecommunication providers, invest significantly every year in our networks to ensure New Zealanders have access to world class digital services.

9. The mobile, wireless and fixed line/fibre services that Spark, Chorus, One NZ, Connexa and FortySouth provide are a key part of our national infrastructure. Mobile communications have developed into an essential and critical function, supporting New Zealanders in all aspects of their lives. It is worth explaining a couple recent changes to the how we build and provide network due to Spark, One NZ and 2degrees selling most of their passive network to Connexa (Spark & 2degrees) and FortySouth (One NZ) are responsible for, building, owning, operating, and maintaining the mobile tower infrastructure which Spark, 2degrees

and One NZ attach their network equipment. Spark, 2degrees and One NZ remain telecommunication network operators providing customers the opportunity for digital connectivity. The diagrams in Appendix 2 give a general understanding of what each organisation is responsible for and highlight the split between passive structures and the active components of the Spark, 2degrees and One NZ wireless networks.

10. The influence of the telecommunications sector and its infrastructure is significant across the four dimensions of wellbeing: Economic, Social, Cultural, and Environmental. Mobil, wireless and fixed line/fibre infrastructure is critically important for the economy and peoples' wellbeing. Our services also allow consumers to contact friends and family, conduct business, be entertained, and engage with Government, medical, educational, and emergency services. Similarly, our sector will be a critical driver of productivity growth across the New Zealand economy in the near and long-term.

Telecommunication is important to Tāmaki Makaurau

11. We would like to take the opportunity to highlight the importance of telecommunications to Tāmaki Makaurau. Telecommunications infrastructure is nationally, regionally, and locally critical. It is fundamental to digital transformation of private and public (both social and network) infrastructure. Telecommunication networks, wireless and fixed line are a critical part of enabling New Zealand to successfully respond to climate change, monitor and enhance the environments that New Zealander's love. These networks enable the gathering and generation of data to better understand and respond to changes, especially environmental changes which are occurring at pace. Telecommunication network technology is continually developing and changing to meet customer expectations for new, faster, and uninterrupted digital experiences wherever possible they are. The continual challenge is finding locations to increase the density of the telecommunication networks to meet the demand generated by growth and development.

12. Well-functioning communities depend on recognising and planning for the all the core infrastructure including telecommunications, social infrastructure, three waters,

transport/movement, and electricity. There are interdependencies between networks especially on electricity. Urban systems are interdependent for example a poorly community with poor connectivity generates car dependency, which leads to air pollution, high carbon emissions, obesity and other health issues, degradations of local amenity, anti-social behaviour and loss of natural habitat.

13. Telecommunications and digital infrastructure are important for ensuring access for everyone including those who are vulnerable and disadvantaged. Ensuring that telecommunications networks are recognised, planned for, and constructed is critical part of planning for growth and development in the Tāmaki Makaurau as telecommunications:
    a. shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
    b. link people, enabling the flow of ideas and information.
    c. connect whanau, communities, business, enables new technologies and is becoming increasingly essential for accessing key services such as education, social, health, business, and government services.
    d. significantly contribute across the four dimensions of wellbeing: economic, social, cultural, and environmental.
    e. Ensuring access to quality connectivity will be key to reducing emissions.
    f. Avoiding transport emissions by enabling more people to work and study from home. This goes beyond connecting people and enabling secure remote access to systems and services and monitoring physical assets. A consequential life cycle assessment was undertaken in 2022 to measure how working from home one day a week affects the size of an employee's carbon footprint. One NZ commissioned Thinkstep-anz carry out a Consequential Life Cycle Assessment (CLCA)[1] which found that the average New Zealand office worker who works one day a week from home

[1] What does working from home do to your carbon footprint? (one.nz)

will save 4.2kg in carbon emissions per day, compared to commuting into the office every day.

g. Using smart technology to reduce energy consumption for individual households and public institutions such as schools and hospitals. This includes smart thermostats, heat pumps, and water heaters, and demand management technologies to support grid decarbonisation and reduce peak demand by controlling and coordinating energy heavy activities such as EV charging.

h. Using smart cities technology to help tackle climate change. For example, for traffic management, optimising refuse collection, monitoring pollution, optimising street lighting, ride sharing, energy metering, and switching on devices at times to optimise energy use.

i. The smart technologies we mention rely on sensors and telecommunications networks to record and relay data. Research from Spark and Thinkstep-ANZ[2] found that digital technology as an enabler of a variety of actions could collectively reduce annual emissions 7.2 Mt by 2030 - the equivalent of 42 percent of Aotearoa New Zealand's current emissions budget targets.

14. that FDS recognises telecommunication networks and digital enablement are an important part of climate change mitigation part of the FDS alongside initiatives in Principle 1.

15. We rely on the Auckland Unitary Plan, especially Chapter E26 Infrastructure and the National Environment Standard for Telecommunication Facilities 2016, to build new networks to support the densification and spatial growth of Tāmaki Makaurau. As a consequence of the increasing buildings heights for medium density housing the Auckland Unitary Plan require updating. The TCF submission sets out the same challenges for the telecommunication sector. The NESTF permits poles/masts up to 3.5 metres taller than the surrounding streetlight poles. We

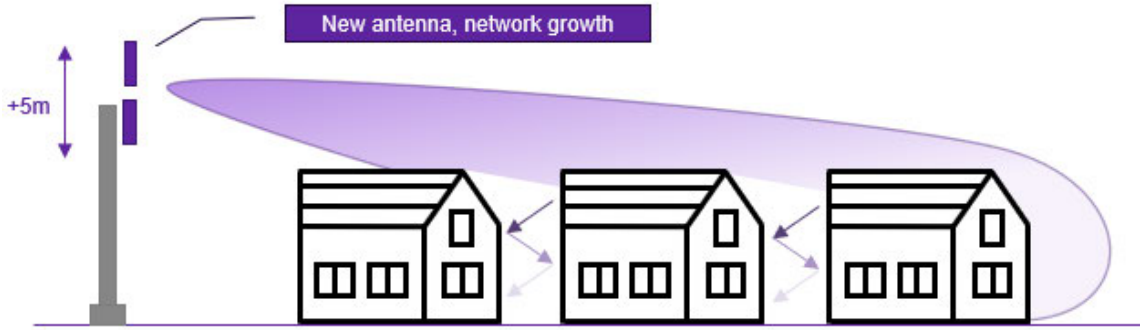
[2] Meeting The Climate Challenge Through Digital Technology (sparknz.co.nz)

attach antennas and other equipment needed to transmit radio signals to these poles.

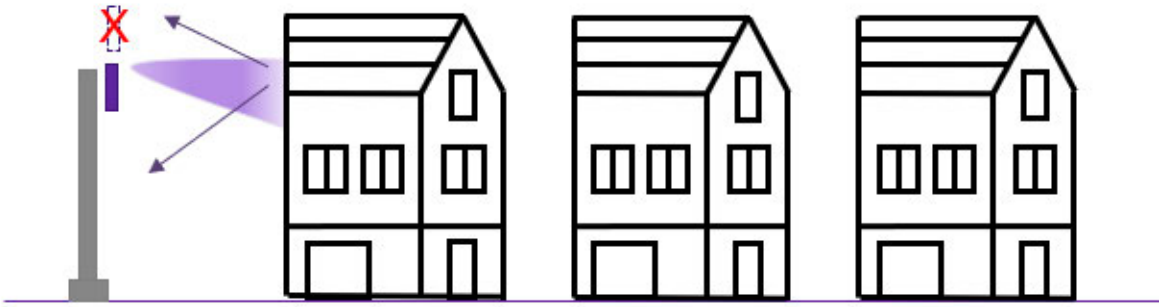
16. This rule was adopted because mobile antennas work best when they are around 5 meters taller than the surrounding buildings and obstructions. Radio waves do not travel easily through buildings and trees (refer to appendix 1 for examples of this "radio path loss").

17. With streetlights typically being 8 to 9 meters tall in suburban areas, the NESTF rule meant we could deploy poles up to around 12 metres and this provided sufficient height margin above the then typical single/double story suburban environment for mobile services.

The ideal height for mobile antennas is 5m taller than surrounding buildings and obstructions, with space for additional antennas used for sharing the mast and growth. This maximises coverage in suburban environments.



Conversely, wireless signals do not travel easily through obstructions, and this can result in blackspots within the wider network coverage areas (where customers are in the shadow of a building) and can lead to radio emission safety concerns. Tight equipment envelopes limit our ability to deploy new antenna for growth or sharing.



18. However, NESTF standards are becoming less effective over time as the urban environment changes:
    a. Local authorities are deploying narrower and shorter LED streetlights of around 6 meters. As masts can only be 3.5 metres taller than the surrounding streetlights, this means that in these areas we can only deploy masts to around 9.5 meters in height.
    b. At the same time, suburban buildings are getting taller as the MDRS rules apply. The MDRS permits buildings up to 12 meters and this is taller than the NESTF permitted mobile site (and significantly taller where LED streetlights have also been deployed).
    c. Urban forest initiatives mean an increase in the number and density of trees in the street berms. Trees - like buildings - impact on the coverage footprint of a cell-site.

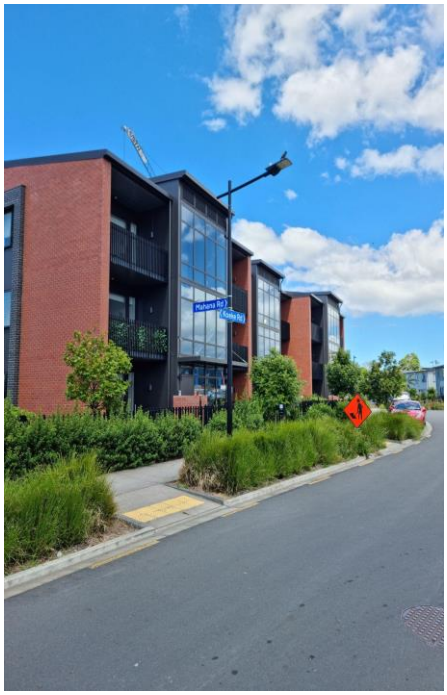
19. These changes mean existing sites - and increasingly any new site planned in accordance with the NESTF - are shorter than the typical building height in suburban areas. As buildings and trees obstruct wireless signals are more likely to be obstructed by buildings and trees and, without mitigation, coverage "blackspots" appear. Customers loose service.

    Example 1: new high-density developments where building heights exceed the NESTF envelope

    The new Kainga Ora development being built in Northcote, Auckland. The light pole shown in the photo's measures approx. 6m tall and 155mm in width. The adjacent

buildings measure 10m and 15.6min height (four storey apartment building). We will not be able to provide additional coverage in this area using the NESTF as the NESTF only provides for new mobile sites up to 9.5m.





The Kāinga Ora Te Ara Awataha development is at risk of impaired coverage. The ideal scenario would be that the operators worked with the developers such as Kāinga Ora to design the network in new large redevelopments such as Te Ara Awataha in Northcote, Tāmaki Makaurau Auckland.



20. We don't know how quickly buildings will increase in height – the MDRS cost benefit analysis suggests a range of 5 to 10 years is not unreasonable[3] - but we will need to mitigate the impact on the network if we are to maintain existing services.

21. Operators can mitigate the impacts by increasing the height of existing towers or deploying new taller towers as part of ongoing network capacity augment. However, given the uncertainty of when and if pole heights will increase, operators have an incentive to avoid areas of potential high density where there is a high risk of having to relocate sites.

22. Further without amendment to the NESTF envelope, we expect this situation will also increase resident concerns about radio emissions from towers. Whereas towers within the NESTF envelope now broadcast from antennas that are typically well above nearby residences, the same antenna will be located at a similar height to upper floors in 3-6 story buildings.

[3] Page 82. PWC and MfE use this range for the purposes of the sensitivity analysis suggesting this not an unreasonable range over which the built environment outcomes could occur https://environment.govt.nz/assets/publications/Cost-benefit-analysis-of-proposed-MDRS-Jan-22.pdf

Example 2: new buildings adjacent to existing mobile sites that require the site to be reconfigured or turned off leading to coverage blackspots



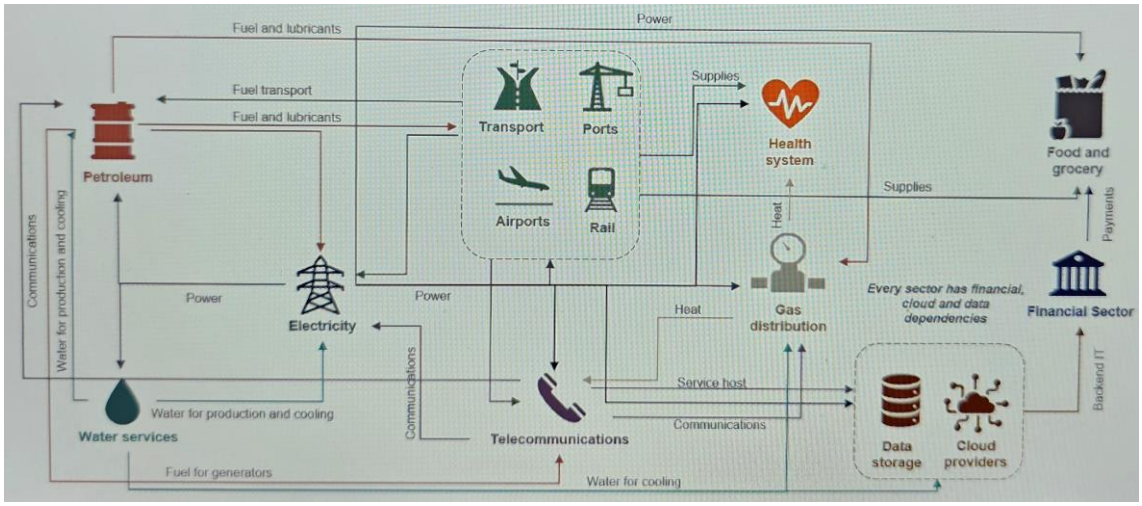
578 Manukau Rd Epsom/Greenwood's Corner. This site will remain in place as it is too difficult to find another site to replicate the existing coverage and capacity. One or two additional sites will be required to correct the coverage footprint of the existing pre-development. We will need to turn off the antenna facing the building if we are unable to point it away from the building.

23. The FDS recognises in Appendix 12 that that the Unitary requires review. Chapter E26 Infrastructure needs review and amendment to enable infrastructure to better support growth in Auckland. More specifically, the following provisions need updates:
    a. E26.2.3.1 activity table - network utilities and electricity generation – all zones and roads. With a focus on the activities A31 to A42, especially poles, cabinets and antennas in the road.
    b. E26.2.5.1 activities within roads and unformed roads. With a focus on:
        i. clause (2) rebuilding area
        ii. clause (3) re height.

c. E26.2.5.2. activities within zones in E26.2.3.1 activity table. With a focus on:
    i. clause (3) re height
d. E26.2.5.3. specific activities within zones in Table E26.2.3.1. With a focus on:
    i. minor infrastructure upgrading
    ii. clause (6) re antennas attached to buildings
    iii. clause (7) re standards E26.2.5.3(8) - (10)
    iv. clause (8) re the maximum number of antennas
    v. clause (9) re the maximum number of antennas in the Business – Local Centre Zone and Business – Neighbourhood Centre Zone
    vi. clause (11) re masts and attached antennas identified as permitted activities in Table E26.2.3.1
e. E26.2.6. Assessment – controlled activities. With a focus on:
f. E26.2.6.2. re assessment criteria
g. E26.3. Network utilities and electricity generation – vegetation management
h. E26.4. Network utilities and electricity generation – trees in roads and open space zones and the notable trees overlay.
i. E26.9. Network utilities and electricity generation – special character areas overlay – residential and business.
j. E26.10. Network utilities and electricity generation – Sites and Places of Significance to Mana Whenua overlay.
k. E26.11. Network utilities and electricity generation – volcanic viewshafts and height sensitive areas overlay.
l. E26.12. Network utilities and electricity generation – Auckland War Memorial Museum Viewshaft, Local Public Views, Ridgelines overlays.
m. Notification, review the need for mandatory notification of applications when required in E26.

25. In a few places in the FDS such as under 2.4.4 and Principle 4. sub-section 4.2.2 *Future urban areas* note the dangers of flooding and land stability as well as challenges with the resilience of infrastructure. The direction of the FDS is that development results in resilient built systems. We support the FDS actions around resilience including the removal of zoned areas for development at risk from natural hazards and events. How we consider that the FDS fails to recognise the impact that disruption to telecommunications, and other critical infrastructure, could have during an extreme natural hazard event, such as Cyclone Gabrielle.

26. The '*Strengthening the resilience of Aotearoa New Zealand's critical infrastructure*'[4] system discussion document outlines why a resilient critical infrastructure system matters for our country and people. The following diagram presented during a Critical Infrastructure webinar on 20 July 2023 by Te Waihanga and Department of the Prime Minister and Cabinet (DPMC) shows the interdependencies between critical infrastructure and impacts of outages in one sector can have flow on consequences for other sectors. Telecommunications and electricity are critical sectors our communities and the economy.



[4] https://consultation.dpmc.govt.nz/national-security-group/critical-infrastucture-phase-1-public-consultation/user_uploads/discussion-document--strengthening-the-resilience-of-nzs-ci-system.pdf

27. that FDS is amended to recognise that interdependencies between infrastructure sector especially telecommunications and electricity. It is essential that the existing and proposed growth areas have telecommunications infrastructure both wireless and fixed line integrated into the developments. Currently is does not happen under the existing regulatory regimes of the Unitary Plan.

If there are any questions regarding this submission, please contact Graeme McCarrison.

Ngā mihi

Planning and Engagement Manager - Spark
[redacted]

Planning Manager - FortySouth
[redacted]

Planning Manager - Connexa
[redacted]

Planning & Engagement Manager - Chorus
[redacted]

–

Telecommunications infrastructure is critical and essential to a modern economy and connecting the 'system of systems' that supports New Zealand's economy and wellbeing of people and communities.

The Infrastructure Commission's discussion document on Infrastructure for a Better Future recognises the critical nature of telecommunications infrastructure. The report notes that 'Increasing reliance on communications makes telecommunications infrastructure more critical.'

Telecommunications plays a vital and important role in national resilience, demonstrated most recently through our national response to Covid-19, as recognised by the Infrastructure Commission: 'The Covid-19 pandemic is a reminder of the importance of a resilient, flexible and agile infrastructure system, as demonstrated, for instance, in the move to working from home, where telecommunications infrastructure has become a substitute for physical transport infrastructure.'
New Zealand has multiple layers of networks (wireless, IoT and fixed line, plus satellite) and providers include:

- Wireless networks of Spark, One NZ, 2 degrees and Rural Connectivity Group (RCG) (a joint venture between Spark, One NZ and 2 degrees
- Fixed line networks operated by Chorus nationally, Tuatahi First Fibre (previously Ultrafast Fibre Limited) throughout Waikato, Bay of Plenty, Manawatū-Whanganui, Taranaki and Enable in parts of Canterbury including Waimakariri. Note that Spark and One NZ have large fibre networks of their own.
- Connexa and FortySouth manage, and build passive infrastructure for network operators such as Spark, One NZ and 2degrees.
- Wireless Internet Service Providers (WISPs) – there are about 30 WISPs operating across Aotearoa – including Amuri Networks in Canterbury
- International companies e.g. Starlink (SpaceX service), Amazon, Google

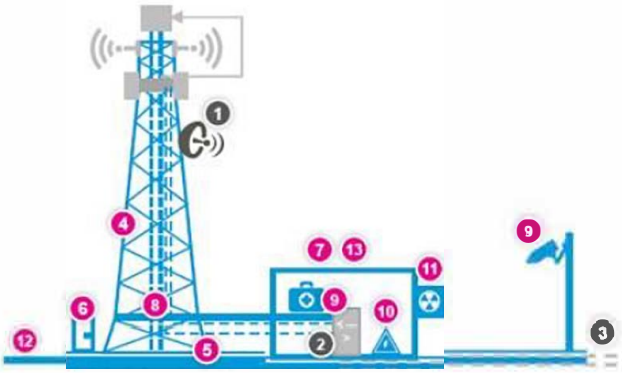
Our wireless telecommunications networks enable the provision of Emergency Mobile Alerts by the National Emergency Management Agency. These are messages about emergencies sent by authorised emergency agencies to capable mobile phones. The alerts are designed to keep people safe and are broadcast to all capable phones from cell towers within the emergency area.

Telecommunications infrastructure is a key enabler of future technologies that are expected to be one of the solutions to many of today's challenges, from climate change to lifting our productivity and innovation. The Climate Change Commission's final advice to the government for its emissions reduction plan notes precision agriculture as an example of the ways in which technology will help to improve efficiency and reduce environmental impacts in agriculture – it requires digital connectivity and networks to be possible.
The rollout of 5G and digital technology that it enables is critical to a well-functioning urban environment as it is widely expected to transform our cities and the ways in which we use other types of infrastructure.

Appendix 2 Connexa & FortySouth

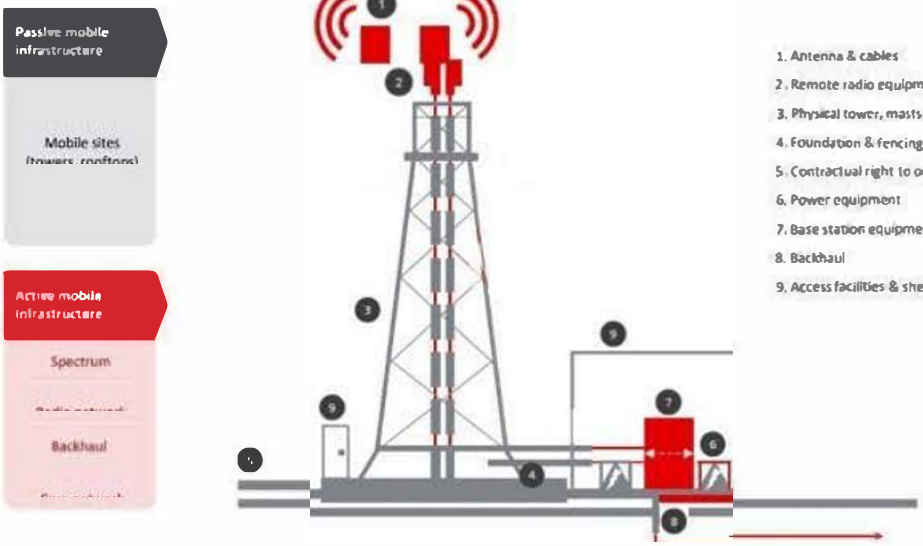
Spark / Connexa asset split on a typical macro tower

Standard configuration of a Macro tower



	Asset / Equipment	Ownership
1	Active radio-transmission equipment	Spark / third parties
2	Backhaul router	
3	Backhaul fibre	
4	Transmission masts and towers	Connexa
5	Fencing / gates	
6	Access facilities	
7	Huts (incl. rack space and cabinets)	
8	Rooftop walkways / ladders	
9	Fire suppression and security systems[2]	
10	DC power, back-up generators and batteries	
11	Airconditioning units	
12	Mobile only freehold sites	
13	Other passive equipment	

FortySouth



1	Antenna & cables	Active
2	Remote radio equipment	Active
3	Physical tower, masts & pole	Passive
4	Foundation & fencing	Passive
5	Contractual right to occupy site area	Passive
6	Power equipment	Active
7	Base station equipment	Active
8	Backhaul	Active
9	Access facilities & shelter/service rooms	Passive

Future Development Plan 2023 #8162

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Your feedback

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

Other

Tell us why

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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.

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

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

Other

Tell us why

Refer to the attached submission prepared on behalf of Campana Land-Owners Consortium.

Other feedback

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

Refer to the attached submission prepared on behalf of Campana Land-Owners Consortium.

#8162

Saddleback
Strategy | Planning | Design

31 July 2023

Submission on

The Draft Future Development Strategy

On behalf of: Campana Land-Owners Consortium

Attention:	
Auckland Council	futuredevelopmentstrategy@aucklandcouncil.govt.nz

Introduction

This is a submission on the draft Future Development Strategy **(FDS)** on behalf of the Campana Land-Owners Consortium **(CLOC)**. The FDS was notified for submissions on 6 June 2023.

Auckland Council **(Council)** is required to prepare an FDS in accordance with subpart 4 of Part 3 of the National Policy Statement on Urban Development 2020 **(NPSUD)**.

CLOC is supportive of the response to growth within Auckland being led by an FDS prepared in accordance with the requirements of the NPSUD. However, CLOC has concerns with the draft FDS as set out in this submission.

This submission has three parts:

1. Commentary on the Strategic Spatial Framework of the FDS;
2. Commentary on timing of infrastructure outlined in the FDS; and
3. A request that the Future Urban Zoned land comprising Lot 3 DP 71211, Lot 2 DP 71211, Lot 1 DP 402013, Lot 2 DP 402013 and Allot 190 PSH OF Manurewa (Campana Road site) is identified for live-zoning (Business – Light Industrial) from 2025+.

Part 1: Sufficient Supply of Development-Ready Land: FDS Strategic Spatial Framework (Page 15)

Ensuring that there is sufficient development capacity for business and housing is a key purpose of an FDS under Clause 3.15.

Land supply is a central aspect of ensuring sufficient development capacity for industrial land, as it enables opportunities for high-value businesses to grow and employ more people. Economic development of the region may be constrained if the FDS is not prepared properly, with negative consequences for the New Zealand economy as a whole.

There are two primary areas of concern:

1. Existing Capacity

Section 1.2.4 (Page 6) details that the FDS builds on the previous iterations and replaces the 2018 Development Strategy yet no commentary or analysis about performance (theoretical verses actual land releases) against the development targets has been provided. Based on this, does Auckland have sufficient capacity for previously forecast growth currently?

It would be helpful if this section set out the number of homes and jobs that have been established within the Future Urban Zone **(FUZ)** since Future Urban Land Supply Strategy 2017 **(FULSS)** was adopted, and how that compared with the FULSS sequencing.

CLOC therefore disagrees with:

The statement within Principle 5(c) (page 23) that *"The future development strategy identifies there is sufficient residential and business development capacity across Tamaki Makaurau".* No justification has been provided to support this statement, and it is certainly at odds with market demand indicators for the industrial sector.

2. Development-Ready Land

The over-arching challenges (Section 2.3, page 12) clearly articulate that "*an uncertain and changing environment*" (Section 2.3.1), seeking to halt "*the ongoing degradation of the natural environment*" (Section 2.3.2) and financial constraints to infrastructure growth (Section 2.3.4) have materially impacted the supply of developable residential and commercial land – as evidenced by the proposal to remove some planned areas (see Figure 13, page 41) from 'Future Urban Area' allocation.

Such an indication raises serious questions over the assumptions underpinning growth modelling as to the rate at which areas indicated for future land uses can actually be converted to 'development-ready' land. Furthermore, other assumptions that underpin development capacity modelling needs to be reviewed include:

- The construction and finance industry's capacity to deliver projects of scale; and,

- Consenting ramifications in light of the principles (Section 2.5, page 15) being proposed to guide future development.

Therefore, in light of the restriction placed on land supply, CLOC agree with the statement in Section 2.3.4 (Investing in Infrastructure in a financially constrained environment) that: *"There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years."*

This being the case, Council should:

1. Be clear that the overarching objective is to maintain an adequate supply of developable commercial land; and,

2. Clarify that infrastructure investment is not necessary in some circumstances.

This submission therefore recommends that subheading in Section 2.3 "*Over-arching Challenges*" be amended as follows:

2.3.1: "~~Spatial planning~~ **Maintaining an adequate supply of development ready land in an uncertain and changing environment"**

2.3.4: "~~Investing in~~ **Provision of infrastructure in a financially constrained environment"**

We also seek that Section 2.4 "Spatial outcomes" includes an initial dot point: **"Tamaki Makaurau has an adequate supply of development ready land."**

Part 2: Timing of Infrastructure

CLOC agrees with the statement in Section S2.3.4 (Investing in Infrastructure in a financially constrained environment) that *"There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years."*

As detailed previously, Figure 13 identifies parts of the FUZ that have either been removed or are under investigation. This requires, as a minimum, some high-level commentary and explanation. For example, what proportion of the land that has been removed was allocated for housing, and what proportion was allocated for jobs?

Principle 5 (Enable sufficient capacity for growth in the right place at the right time – page 25) acknowledges that it is difficult to estimate where and when growth is likely to occur given the NPSUD requirement for Councils to be responsive to out-of-sequence development.

Other considerations raised are:

- Funding and financing pressures have increased (2.3.4, page 13).

- Smaller, distributed and nature-based infrastructure solutions (2.4.4, page 14) are largely untested and therefore challenging to get approved.

- A coordinated approach between agencies tasks with delivering the infrastructure is increasingly challenging (Principle 3, page 19).

This highlights the need for Council to be less rigid with sequencing. Council should also be open to plan change requests where business land is appropriate/necessary, and measures can be put in place to ensure the planned and available infrastructure is adequate.

This being the case, Council should be receptive to out-of-sequence development where additional infrastructure is not necessary, or there are solutions to infrastructure provision.

Part 3: Rationale for Including the Campana Road Site

During the Auckland Unitary Plan deliberations (finalised in 2016), a significant area of land west of SH20B and adjoining the Waokauri Creek was identified as the Puhunui Precinct and contained 6 sub-precincts. This included Sub-precincts A, B and D that have now been included within the Business-Light Industrial Zone. These existing industrial zoned areas are generally bound by Puhinui Creek to the south and Waokauri Creek to the north.

Approximately 70ha of land, identified as Sub-precinct-C, is now surrounded by Business – Light Industrial Zone but remains as Future Urban Zone (FUZ). While different to Council's closing remarks in the Auckland Unitary Plan Hearings process, that this land should be live zoned to Business – Light Industry Zone, Sub-precinct C was excluded from the Business – Light Industrial Zone because (primarily) Te Akitai Waiohua were concerned about uncertainties of effects on Pukaki Creek and Waokauri Creek and potential for future traffic infrastructure being required across Pukaki Creek.

While the panel considered that live zoning was *"seemingly inevitable"* and adverse effects matters can be appropriately managed through proposed control provisions, the s6(e) RMA matters suggested that a more cautious approach be taken due to Mana Whenua concerns. The Panel also noted that the extent of land live zoned to Business – Light Industry Zone in the overall precinct suggests that timing for this area to be developed is not so critical. The Panel therefore found that Sub-precinct C should not be live zoned but notated as Future Urban Zone so that these matters can be addressed specifically through a subsequent structure plan process[1].

Fast-forward seven years and there is now a significant shortage of developable commercial land, particularly commercial land close to residential central/south Auckland and Auckland Airport.

[1] See page 86-87 of the Report to Auckland Council, Hearing topics 016, 017 Changes to the Rural Urban Boundary; 080, 081 Rezoning and precincts, dated July 2016

FDS as it relates to FUZ within the Puhinui Precinct (Sub-precinct C)

Figure 13 (page 48) of the FDS identifies that the timing for the Puhinui FUZ is 2030+. This is supported by the *"Future Development Strategy – Future urban areas evidence report"* for Puhinui (pages 51-52).

The evidence report notes that transport infrastructure is not expected to be available to support development until 2030+, which appears to have fundamentally informed the proposed sequencing.

CLOC and the Campana Road site

CLOC's intention is to submit a private plan change request to rezone the Camapana Road site from FUZ to Business – Light Industrial. CLOC is comprised of five landowners who own approximately 25 ha of land within Sub-precinct C (the Campana Road site). Refer plan attached.

The CLOC parties include:

- Puhinui Industrial Estate Limited, within Allot 190 PSH OF Manurewa
- The Royal New Zealand Society for the Prevention of Cruelty to Animals Incorporated (SPCA), within Lot 2 DP 402013
- Perry, within Lot 1 DP 402013
- Anderson, within Lot 2 DP 71211; and
- Savannah Holdings Limited within Lot 3 DP 71211.

Farming activities within the site has significantly reduced or ceased more recently due to range of factors, including a lack of production infrastructure.

SPCA are also in the process of seeking resource consents to relocate their South Auckland (currently based in Manurewa) to the subject site. The design and consultation supporting this development commenced in 2021 and resource consent applications to allow construction were lodged in February this year.

The other owners of land within Sub-precinct C (Wiley and Wong) were invited to join the consortium but had either not replied or indicated that they had no immediate desire to live zone their land.

CLOC has commenced initial investigations to support site structure planning, along with consultation with Mana Whenua and Council policy staff. Further discussions with Mana Whenua, along with Auckland Transport, Waka Kotahi, Watercare and Auckland Airport will be undertaken soon, following completion of initial technical assessments.

Structure Plan-Led Development

The FDS is aiming to build an *"integrated strategic approach for resilient urban, future urban, rural and business environments, that protect and restore the natural environment and make best use of infrastructure and scare funding"* (Section 1.1, page 4)

Structure (or Framework) Plans are widely acknowledged as the best method to achieve this as they detail what needs to be achieved irrespective of underlying land ownership. The attributes and elements that would shape a Puhunui Precinct Structure Plan are:

1. The constraints imposed by operational requirements for AIAL, specifically:
    a. No-build areas in immediate proximity to the runway threshold; and,
    b. Building constraints under the direct flightpath.
    c. Ramifications of the second (parallel) runway planned to the north.
2. Restoring the natural environment:
    a. Imposing riparian margins to all watercourses (including Pukaki Creek, Waokouri Creek and Otaimako Creek) and their ephemeral tributaries.
    b. Low impact stormwater solutions requiring significant areas in and around these areas.
    c. Puhinui Crater and Puhinui Reserve to the south.
3. Make best use of infrastructure:
    a. Watercourse margins to accommodate off-road creational and pedestrian/cycle pathways (modal shift).
    b. The progressing Airport to Botany **(A2B)** multi-modal corridor along Puhinui Road - restricting road access points to preserve the efficacy of this key corridor.
4. Optimise outcome from limited funding:
    a. Leveraging existing roads and intersection points.
    b. Leveraging from (Auckland International Airport Limited **(AIAL)** investment (including Park and Ride facilities)
    c. Leveraging watercourse margins and associated pathway networks to reduce traffic demand.
    d. Limit the construction of expensive intersections, overpasses or bridges and focus to locations where optimal development can occur.

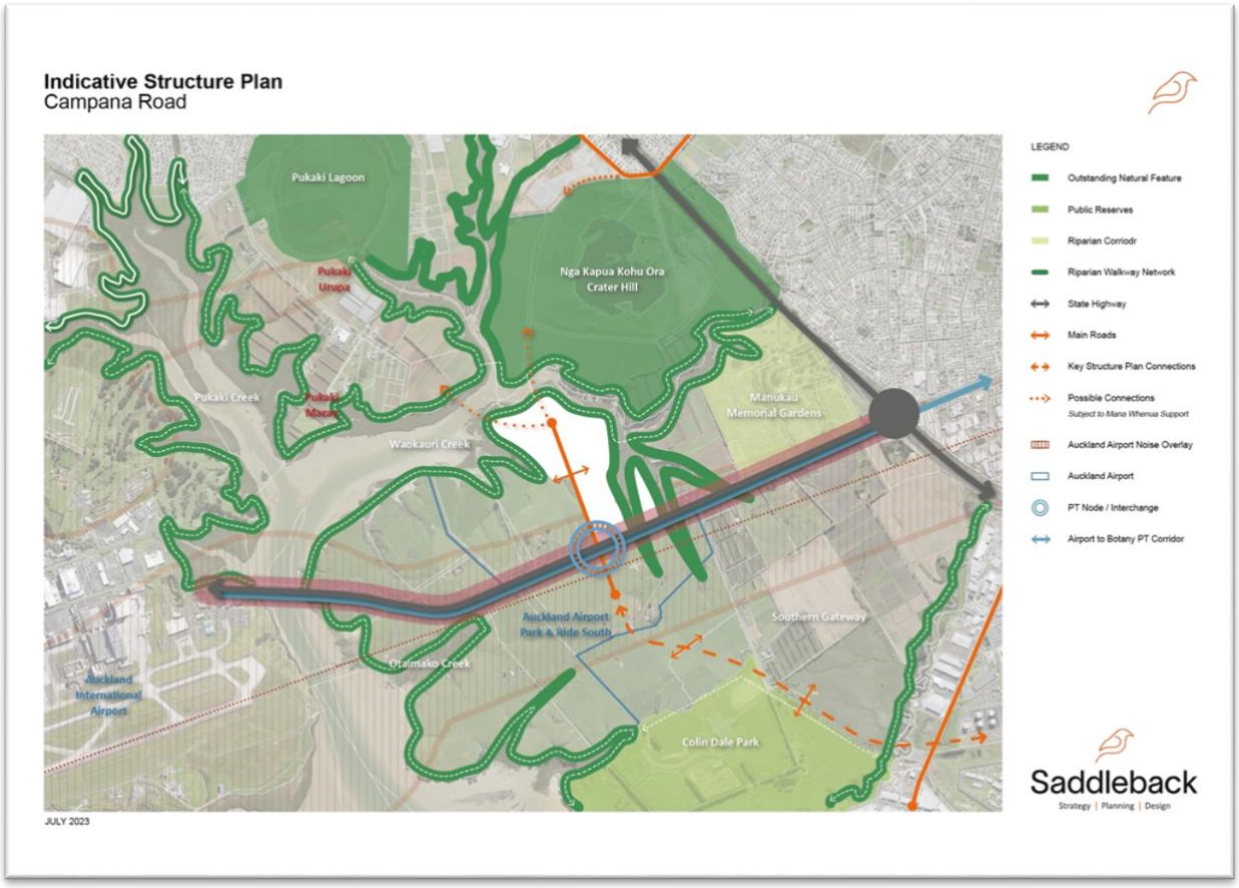
e. Create direct and legible linkages to these points to help provide alternate routes (network reliance).

5. Other considerations:

a. Iwi considerations (predominantly Te Akitai / Pukaki Marae) and aspirations.

b. Protection and celebration of the Pukaki Lagoon and Nga Kapua Kohu Ora (Crater Hill) as cultural and recreational amenities (subject to Mana Whenua support).

c. The desire to link Colin Dale sports park area into a wider creational network (established by item 2 above).



These attributes heavily impact the functional development area, and also start shaping how and where development would occur. Even without detailed testing it is clear that including the some of the *"un-zoned"* areas in Sub-precinct-C and including them as Business – Light Industrial Zone has limited additional impact, but provide benefits in terms of how the area can be developed, including:

- Helping shape linkages to the large recreational and cultural landscapes (subject to Mana Whenua support):
    - North to Pukaki Lagoon and Nga Kapua Kohu Ora (Crater Hill)

  - South to Colin Dale sports park Puhinui Crater and Puhinui Reserve
- Establishing a transit hub (low-level by virtue of flightpath constraints) along Puhinui Road
- Shaping a resilient roading network for Business – Light Industrial users away from Puhinui Road

These elements provide direct benefits to:

- Surrounding residents;
- Airport and local workers; and
- Businesses throughout the Puhinui Precinct.

Recommendations and Requests

It is requested that the Campana Road site within the Puhinui FUA is brought forward to 2025+ because:

1. Business – Light Industrial zoning of the area is generally consistent with the intent of the Unitary Plan hearing recommendations.

2. There is now a significant demand for commercial land in the area and due to the central location will result in reduced vehicle emissions compared to other commercial land that is further from housing.

3. The land within the Campana Road site is generally unproductive and the underlying rural zone is not appropriate.

4. Initial design work has commenced. It is intended that and structure planning will be completed in partnership with Mana Whenua.

5. The initial development requested would be limited to the SPCA activity and low traffic-generating storage use, controlled by new precinct conditions. Full development would be limited to these activities until planned transport infrastructure is available.

6. The NOR to complete the Airport to Botany Rapid Transit has been lodged and maybe approved this year. It is possible that the necessary transport infrastructure to allow full development of the site prior to 2030.

This submission therefore recommends that Figure 13 of the FDS is updated to show the Proposed new timing of the Campana Road site as 2025+, rather than 2030+.

Kind regards,

[redacted]
Joe Gray

Principal Urban Planner
Saddleback Planning Limited

[redacted]
Bruce Weir

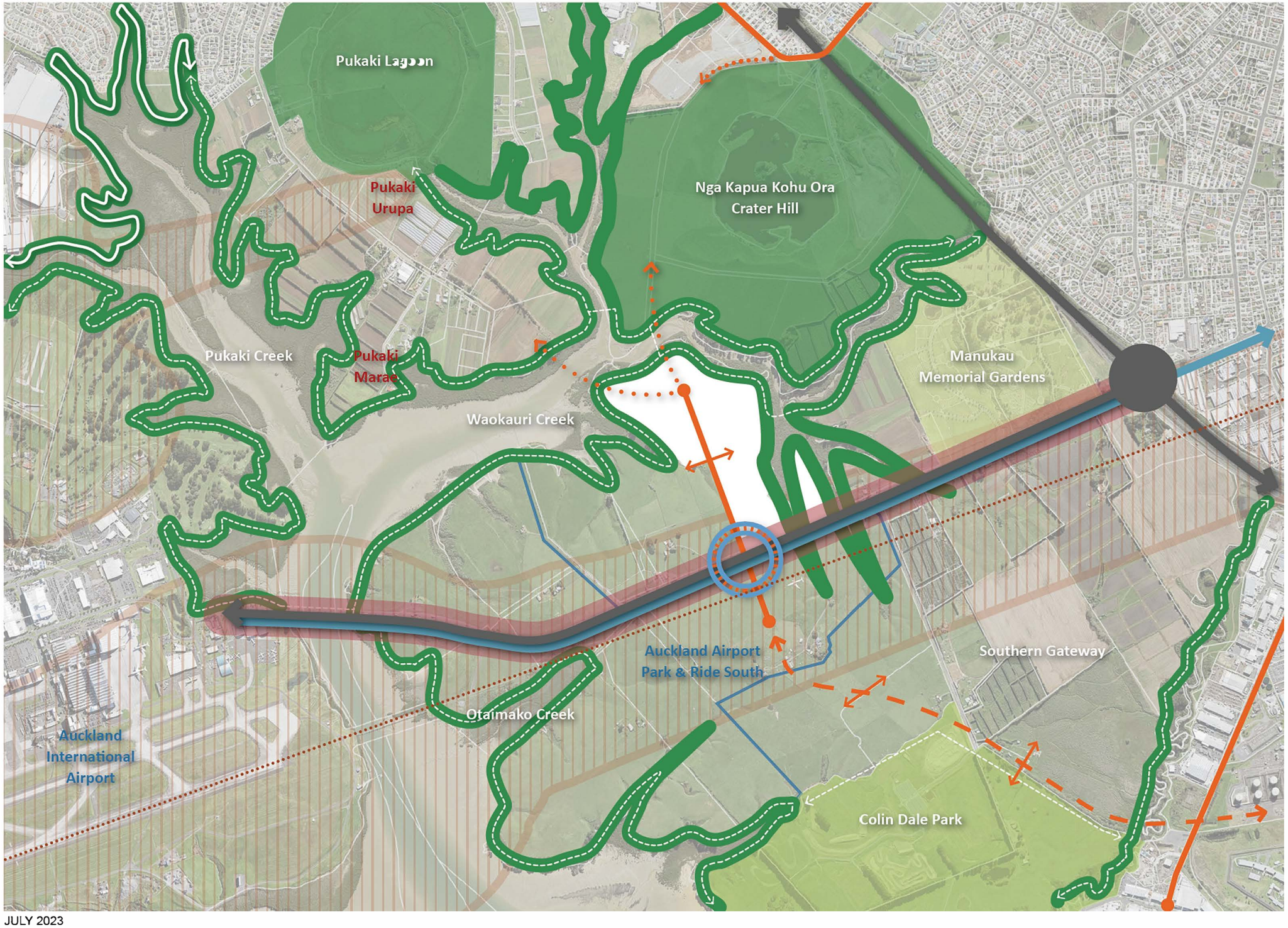
Principal Urban Designer
Saddleback Planning Limited

Appendix 1:

Indicative Structure Plan (CLOC)

#8162

Indicative Structure Plan
Campana Road



LEGEND

- Outstanding Natural Feature
- Public Reserves
- Riparian Corriodr
- Riparian Walkway Network
- State Highway
- Main Roads
- Key Structure Plan Connections
- Possible Connections
  Subject to Mana Whenua Support
- Auckland Airport Noise Overlay
- Auckland Airport
- PT Node / Interchange
- Airport to Botany PT Corridor

Saddleback
Strategy | Planning | Design

JULY 2023

Future Development Plan 2023 #8164

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Disagree with developing culturally significant areas regardless of whether they are greenfield or within existing urban areas. More consultation with Mana Whenua iwi would have been preferred to develop this further. Development should occur where it makes sense in the context of the area. In general this should naturally occur in urban areas, but it does not need to be the most important determining factor. A balanced approach to growth can still work well.

Accessible local centres

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

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

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

Disagree

Tell us why

Disagree that focus should primarily be on existing local centres. Future local centres are just as important depending on the context of the area and whether necessary infrastructure requirements can be achieved to support the potential local centre. Again taking a balanced approach to development can also work. More consultation with Mana Whenua iwi would have been preferred to develop this item further as the propose approach means local iwi based close to existing local centres would benefit more from development than iwi based further away from local centres.

Avoiding hazards

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

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

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

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

Agree

Tell us why

This approach appears consistent with Mana Whenua iwi kaitiaki principles around sustainability and the environment depending on what is meant by a significant natural hazard risk. More consultation with Mana Whenua iwi would have been preferred to develop the definition further.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

This approach appears consistent with Mana Whenua iwi kaitiaki principles around sustainability and the environment depending on what is included or excluded within nature based infrastructure. More consultation with Mana Whenua iwi would have been preferred to develop the definition further.

Other feedback

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

Please refer to attached file

Future Development Plan 2023 #8165

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Your feedback

Focusing growth

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

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

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

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

Agree

Tell us why

As a social enterprise focused on removing the barriers to the rapid, widespread and equitable uptake of e-bikes, Big Street Bikers (BSB) supports a Future Development Strategy that results in a denser, more compact city. A more compact city gives more Aucklanders the opportunity to switch short expensive car trips to an easy bike ride. This is one of the most effective ways of reducing household transport costs.
BSB supports focusing most of Auckland's growth in existing urban areas that results in improvements to the environment, the economy, and people's wellbeing and is aligned with Council's Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan 2020. Over-extending into greenfields for future development has significant negative consequences. It will increase car trips and emissions, add significant costs to council's infrastructure bill and will have a detrimental impact on local economies, community wellbeing and resilience.

Accessible local centres

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

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

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

Agree

Tell us why

Big Street Bikers supports focusing development near local centres so that more Aucklanders have the opportunity to live, work, study, and access services and facilities without being dependent on a car. More people having the option to live near local centres supports the local economy, keeps local centres busy and vibrant, and generates more local employment opportunities.

The proposed approach to focus development near local centres reduces household transport costs and will help council avoid a massive infrastructure bill to service greenfields sprawl.

Avoiding hazards

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

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

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

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

Agree

Tell us why

Big Street Bikers supports avoiding further growth in areas which are exposed to significant hazards as a prudent and sensible approach. We also support the council urgently investigating an appropriate response to potentially vulnerable locations where development has already been enabled.

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Big Street Bikers supports prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing as an appropriate response to climate change and rising costs. Nature based solutions are more cost effective and have a range of other benefits with regard to improving habitat, biodiversity and community well-being.

Other feedback

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

Big Street Bikers would like to see the Future Development Strategy better aligned with existing carbon emission reduction goals . We support the re-priorisation of transport projects towards investment that supports more healthy, accessible and equitable neighbourhoods, predicated on enhanced walkability and improved cycling access (as outlined in TERP).

Development changes that support a more dense city and vibrant, mixed-use neighbourhoods for people in existing suburbs across Auckland will greatly influence how people travel and reduce the need to drive.

We also support council undertaking further investigation into necessary rule changes to ensure that intensification is well planned and comes with sufficient green space, public space and social infrastructure

Future Development Plan 2023 #8166

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Your feedback

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

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

Other

Tell us why
refer attached submission

Accessible local centres

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

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

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

Other

Tell us why
refer attached submission

Avoiding hazards

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

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

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

Other

Tell us why
refer attached submission

Resilient infrastructure

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

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

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

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

Other

Tell us why
refer attached submission

Other feedback

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

refer attached submision

Auckland Council via upload https://akhaveyoursay.aucklandcouncil.govt.nz/future-development-strategy/survey_tools/help-us-shape-auckland-s-future-growth

31 July 2023

Submission by Fletcher Development Limited and Fulton Hogan Land Development on the Draft Auckland Future Development Strategy in respect to Silverdale West

Introduction

Fletcher Development Limited (FDL) and Fulton Hogan Land Development Limited (FHLD) make the submission set out below on the draft Auckland Future Development Strategy (FDS).

FDL acquires and develops industrial land that support Fletcher Building property requirements or is developed and sold to other purchasers. FDL delivers significant capital investment projects within key growth areas in Auckland where industrial development is well supported by infrastructure, market demand and employment.

FHLD undertakes large scale urban development projects and has been active in Auckland for the past 30 years. While the majority of the development undertaken in Auckland has been residential to date, FHLD has undertaken industrial development elsewhere in NZ. As is the case at Silverdale West, the industrial development to be undertaken by FHLD is close to where significant residential growth is occurring so as to provide employment opportunities close by.

1. Background

1.1 FDL and FHLD separately own over 100 hectares of greenfield land in Silverdale, west of State Highway 1 motorway and east of Dairy Flat Highway. This area is identified for industrial development in the Silverdale West Dairy Flat Industrial Area Structure Plan 2020. This Structure Plan was prepared by and adopted by Auckland Council in April 2020.

1.2 The Auckland Plan, AUP and Future Urban Land Supply Strategy (FULSS) also identified the Silverdale-Wainui area as a key growth area for Auckland. Significant up-zoning in the area for housing has been facilitated through the AUP and subsequent plan changes. This includes Milldale, one of New Zealand's largest residential subdivisions that is being delivered by FHLD.

1.3 The FULSS identified the need to provide additional industrial employment land in the north to create a reasonable proportion of job opportunities within the Silverdale-Wainui community. The Silverdale West Dairy Flat Structure Plan states 'the Silverdale West Dairy Flat area will become the focus for future light industry growth in the urban north due to the urban growth proposed in the wider area and the imminent exhaustion of light industry zoned land supply in the North Shore, Silverdale and the Highgate Business Park. It will also be the next nearest light industry zone location to urban Auckland.' Council had identified that the land was to be development ready in the 2018-2022 time period.

1.4 In 2020 the Council resolved to move to live zone Stage 1 of the area for industrial development. This was seen as critical in terms of economic development, the social drivers relating to employment, and transport in terms of creating more jobs in the north and so reducing the need for commuting south to Albany and the city centre. However, Auckland Council has yet to notify their Plan Change for this area, signalling budget constraints and an inability to reach agreement with Auckland Transport on infrastructure challenges.

1.5 FDL and FHLD set up a collaborative approach to work with the Council to advance a Private Plan Change (PPC). Our PPC is intended to give effect to the Council's adopted Structure Plan. It does not seek to change zoning or intensity beyond that Structure Plan. It simply facilitates a portion of the Structure Plan that Council would have facilitated through a public plan change if they had met their proposed timing. The PPC intends to live-zone over 100ha. of Light Industry land from Stage 1 of the Silverdale West Dairy Flat Industrial Area Structure Plan 2020.

2. Key submission Points

2.1 The draft FDS has taken land which should have already been released for industrial development to create jobs for the significant growth in housing in the Silverdale Wainui area and has deferred this to 2030+. This places additional pressure on the northern transport corridor as new and existing residents need to commute to work further south. The strategy to zone and develop a significant area of industrial land to enhance employment opportunities in the north concurrent with residential development, remains the right approach.

2.2 47% of the Hibiscus catchment leave the local economy for employment indicating there is significant industrial employment base within the localised market but not enough industrial activity and employment opportunities locally to satisfy this demand1. There is a significant level of industrial employment leakage to other industrial employment locations in North Harbour, Rosedale, Wairau Valley and further afield to Onehunga, Auckland Airport and Wiri, generating increased VKT emissions. The Silverdale PPC area could potentially accommodate up to 2,000 industrial employees which would reduce the need to travel further distances, likely by car.

2.3 FDL and FHLD have worked with Council to identify ways to resolve infrastructure for at least the first stage of development without triggering significant upgrades to the Silverdale interchange. It is critical that land is released for development in stages, with infrastructure provision matching the demands of these stages. Requiring infrastructure for all stages to be to be funded and delivered prior to any development is simply not feasible.

2.4 FDL and FHLD intend to lodge a plan change request to rezone over 100ha of FUZ land at Silverdale West to light industry zone, with FDL and FHLD funding the identified transport upgrades and wastewater services for Stage 1. The proposed FDS as drafted would not facilitate this approach as Council would not accept private plan changes nor alternative approaches to infrastructure funding that include contributions from the private sector.

2.5 The PPC area has a robust stormwater management design to manage all flood prone areas, overland flow and stormwater within the catchment so there is no

[1] Silverdale Industrial Private Plan Change Economic Assessment by Property Economics, April 2023

#8166

impact either upstream or downstream and modelling has demonstrated a 1% AEP flood event can be safely conveyed and stored through the site.

2.6 Much of the bulk sewerage and water networks to serve the Silverdale West area has already been constructed by FHLD and further water infrastructure is being installed as part of the Highgate Bridge project currently underway (please refer to the attached for details).

2.7 In summary, FDL and FHLD will fund and resolve infrastructure to enable the first stage of industrial land to be live zoned. The private sector and not Council will be responsible for solving the infrastructure funding problem. The response of the draft FDS runs contrary to this approach as the implications of the draft FDS is:

- only the Council can fund the necessary infrastructure
- the Council cannot afford to fund the infrastructure until a future date
- the area should be deferred from live zoning to a future date.

3. Conclusion and Requests

3.1 FDL and FHLD seek the following from the Council:

3.1.1 that Council receive and process our pending PPC application for Silverdale West based on current operative policies and without deferment or delay and without giving consideration to future, and unadopted, provisions of the FDS

3.1.2 that the current FDS process be paused and meaningful engagement is held with FDL and FHLD in relation to Silverdale West

3.1.3 as a bare minimum any new iteration of the FDS include:

- Silverdale West area as a committed growth area;
- Stage 1 of Silverdale West be shown as development ready in the 2023-2030 time period;
- Council will accept Private Plan Changes
- Alternative funding solutions for infrastructure will be considered, including involvement and contributions from the private sector

We look forward to further engagement in relation to Silverdale West.

[redacted]

Future Development Plan 2023 #8167

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Your feedback

Focusing growth

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

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

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

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

Disagree

Tell us why

Short answer , (Will go into detail during consultation,)

It will not work . Per meter costs are prohibitive for average wage earner . Roading density , storm water upgrade , power upgrade , green space addition , public transport upgrade etc etc .
The council must submit a costing and timing of the true cost .

Accessible local centres

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

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

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

Agree

Tell us why

Use existing transport routes ,including rail !!!

Avoiding hazards

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

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

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

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

Agree

Tell us why

Resilient infrastructure

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

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

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

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

Agree

Tell us why

Other feedback

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

Future Development Plan 2023 #8174

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

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#8174

Auckland Council Planning, Environment and Parks Committee	David Kidd – Chief Executive Officer Euan Williams – Principal Planner Woods W-REF: P23-242 31 July 2023

Submission

Consultation Draft – Auckland Future Development Strategy 2023-2053

SUMMARY

1. For over 50 years, Woods has been involved in land development and residential projects in the Auckland region, and relies on robust and well considered planning provisions to enable the range of projects we are involved in. As such Auckland Council's response to the National Policy Statement on Urban Development (NPS:UD) is of critical importance to us, and we welcome the opportunity to comment on the Auckland Future Development Strategy 2023-2053 (Consultation Draft) ("Draft FDS").

2. Managing Auckland's growth has become even more acute recently with a national and regional focus on urban development and residential intensification. Woods maintains the proposed planning framework for urban development does not properly account for the benefits of greenfield development and will significantly impact Auckland's growth by:

    a) delaying the progressive re-zoning of future urban zoned land and promoting an imbalanced ratio of brownfields versus greenfields developments;

    b) removing consideration of housing supply, costs and choice from Aucklanders; and

    c) not adequately considering the benefits of greenfields developments.

3. We address these matters in response to the specific issues raised by the submission below.

WHO WE ARE

4. Woods was established in 1970 and we offer a full suite of Urban Design and Architecture, Engineering, Planning, Surveying and Geo-Spatial services to the land development, building, health, institutional, energy, government and transport sectors. We have the experience and skills to deliver a complete project with end-to-end support and our primary focus is on land and infrastructure.

5. Our successful greenfield projects include Flat Bush, Stonefields, Long Bay, Millwater, Milldale and Paerata Rise. These are large scale developer-led projects with exemplary outcomes that can only be achieved at scale. The key to successful delivery of these projects is to masterplan the land upfront to make sure that the infrastructure servicing and amenities are sufficient to meet the future needs of the community, while addressing the risks from natural hazards and maintaining valuable natural futures.

6. Woods are also involved in the Piritahi Alliance that prepares land for development and delivers new and upgraded infrastructure and amenities on behalf of Kāinga Ora - Homes and Communities. The Alliance works within Kāinga Ora's large-scale urban development areas where state-owned land is being better utilised for new homes. We also design and construct new or upgraded infrastructure, parks and public spaces.

ISSUES

Housing supply

7. In 2018, Auckland Council identified a demand of 189,800 dwellings in medium term (1-10 years), and a demand of 408,300 dwellings in long term (1-30 years). In the last five years, 80% of new dwellings have been consented in urban areas, and we believe this is a good balance between urban and rural areas that enables Auckland to meet the demands of new dwellings.[1]

8. However, it is expected there will be a shortfall of approximately 82,000 dwellings in the long term. The Draft FDS indicates that Kāinga Ora, KiwiBuild, and Eke Panuku will work to address the long-term shortfall. By reducing greenfields developments in the long term, the housing shortfall will impact future generations. Of note, the Draft FDS indicates that over the next 30 years, 773,000 dwellings are needed to provide sufficient development capacity (Appendix 4 of the Draft FDS), which are significantly higher than the predicted demand being 408,300 dwellings in 2018.

9. The Draft FDS aims to achieve societal and environmental well-being for all Aucklanders. However, the Draft FDS fails to provide flexibility over housing options for future Aucklanders. The current strategy encourages more people to live in existing urban areas, although fails to acknowledge that not all people prefer to live in urban living environments. The Draft FDS, as currently drafted, removes choice for those Aucklanders who would prefer to live in the greenfield areas of the city and enjoy the benefits that come with that choice.

Cost of infrastructure

10. Though brownfield subdivision may benefit from existing electricity, water and access to public roads, there are significant restrictions in existing urban areas that would increase the cost of construction and infrastructure upgrading. There are also limitations associated with flooding and natural hazards and areas with serious limitations on growth due to infrastructure capacity.

11. In our opinion, the cost and complexity of infrastructure development associated with brownfield development have not been fully acknowledged or recognised by Auckland Council in the Draft FDS. In our experience, the costs associated with large scale brownfield redevelopment can be significantly higher than the cost of greenfield development. This can be in the order of up to three times as expensive per hectare excluding land costs. This is due to the need to upgrade existing infrastructure which hasn't anticipated densification and is often in a poor state, and the associated disruption to existing communities.

Complexity

12. In addition to the above commentary on infrastructure costs, it is important to note the scale of Auckland urban properties that are subject to natural hazards, including flood plains, overland flow paths, coastal inundation, and coastal retreat. This year the Auckland region has experienced the tremendous impact of flooding events. Further to these restrictions, there are also a large number of urban streams, rivers and wetlands that need to be protected, all of which will limit the amount of land available for urban development.

13. It is further noted that there is no clear strategy in the Draft FDS for stormwater improvements as part of Auckland's essential bulk services and no recognition of how difficult it is to undertake brownfield developments at scale due to the lack of infrastructure servicing support.[2] The Draft FDS signals that spatial growth is largely aligned with Kāinga Ora redevelopment areas. However, the key question is, without central government funding, how will the remaining areas in Auckland be intensified and supported by fully funded infrastructure upgrades.

14. Another key challenge for the council is that along the intensification of urban areas, whether there are more spaces to allow more community facilities, such as schools, parks, libraries, sports centres, clinics and early childhood education. Particularly, for public facilities like parks, neither council nor developers would be able to fund new parks in urban areas due to the cost and availability of land.

15. In contrast, a quality master planned greenfield development will enable the provision of appropriate community facilities to suit the needs of future residents. Typically, neighbourhood

[1] https //www aucklandcouncil govt nz/plans-projects-policies-reports-bylaws/our-plans-strategies/auckland-plan/development-strategy/Pages/assessing-demand aspx

[2] https //www aucklandcouncil govt nz/plans-projects-policies-reports-bylaws/our-plans-strategies/auckland-plan/development-strategy/Pages/aucklands-infrastructure aspx

reserves are planned ahead and spatially distributed according to walking distances, schools are planned for and designated, riparian areas are designed to promote both ecological and recreational outcomes.

Timeframes to deliver housing at scale

16. A significant benefit of greenfield over brownfield development is that it can be delivered at scale and at pace. There are a number of factors that prolong the development programme (and cost) within the brownfield context including longer consenting timeframes, complexities with working around existing privately owned housing, traffic control, and poorly maintained underground and overhead infrastructure and utilities. Furthermore, community consultation and engagement with service providers often extends the timeframe of consenting and construction for infrastructure related upgrading projects.

17. Ultimately, brownfields development takes longer to deliver and costs more, and this has a direct impact on housing affordability. In our experience, greenfield developments have the potential to be developed in a more certain timeframe at a more certain cost with this being shorter and significantly cheaper than an equivalent brownfields development.

Benefits of greenfield development

18. As outlined above, the disproportionate focus on brownfields developments will increase the construction costs and the development timeframe to ensure sustainable housing supply. Auckland Council needs to acknowledge the benefits of greenfields developments, including:

    a) providing Aucklanders with housing options and a range of affordability to meet anticipated growth;

    b) contributing to Auckland's GDP and efficient investment and delivering of planned infrastructure;

    c) providing Aucklanders with housing in developments that are well designed and master planned, walkable, accessible to retail and commercial, and include all necessary social infrastructure such as schools and parks; and

    d) effective management of natural hazards including flood mitigation.

Consultation process

19. Clause 3.15 of the NPS:UD requires that, in order to prepare the Draft FDS, the local authority must engage with the development sector to identify significant future development opportunities and infrastructure requirements. However, it is evident the council has failed to engage with the development sector to prepare the Draft FDS. Our land development clients, including Fulton Hogan Land Development Limited, Grafton Downs Limited, Parklands Properties Limited, and Fletcher Residential have not been approached by Council with respect to aligning the intent of the market with areas where growth is enabled and anticipated. Therefore, the Draft FDS has not followed the proper consultation process as required under the NPS:UD and the Local Government Act in preparing the Draft FDS.

20. Due to the absence of thorough consultation with the development community, council has appeared to devalue the contribution these parties make to Auckland and associated economic growth. The Draft FDS will have a number of unintended consequences on Auckland's urban growth, housing choice and affordability, and GDP.

CONCLUSION

21. Based on the above, Woods has concerns on the strategy set for greenfields in the Draft FDS and therefore seeks the following actions from Auckland Council:

    a) that Auckland Council extend the consultation period and make sure that the community and infrastructure developer engagement has gone through a proper and legal process;

    b) that Auckland Council, in consultation with the development community, develop a more robust process to ensure greenfield developments is available in the Auckland region for the next 30 years. That way the FDS will align with current demand for greenfield and brownfield developments and will meet housing supply requirements; and

c) that Auckland Council re-evaluate the costs for the greenfields developments and brownfields redevelopments, and to set a balanced approach to support Auckland's growth.

Date: 31 July 2023

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