

## 2.1 Urban form and land supply - section 32 evaluation for the Proposed Auckland Unitary Plan

<b>1</b>	<b>OVERVIEW AND PURPOSE</b> .....	<b>2</b>
1.1	Subject Matter of this Section .....	2
1.2	Resource Management Issue to be addressed .....	4
1.3	Significance of this Subject .....	5
1.4	Auckland Plan .....	5
1.5	Current Objectives, Policies, Rules and Methods .....	6
1.6	Information and Analysis.....	7
1.7	Consultation Undertaken.....	8
1.8	Decision-Making.....	8
1.9	Proposed Provisions .....	8
1.10	Reference to other Evaluations.....	8
<b>2</b>	<b>OBJECTIVES, POLICIES AND RULES - DEVELOPMENT CAPACITY AND SUPPLY OF LAND FOR URBAN DEVELOPMENT</b> .....	<b>8</b>
2.1	Objectives - Development Capacity and Supply of Land for Urban Development.....	8
2.2	Objectives - Rural Urban Boundary growth management tool.....	13
2.3	Objectives .....	15
2.4	Objectives .....	19
2.5	Objectives .....	21
2.6	Objectives .....	23
<b>3</b>	<b>ALTERNATIVES</b> .....	<b>25</b>
<b>4</b>	<b>CONCLUSION</b> .....	<b>34</b>
<b>5</b>	<b>RECORD OF DEVELOPMENT OF PROVISIONS</b> .....	<b>34</b>
5.1	Information and Analysis.....	34
5.2	Consultation Undertaken.....	37
5.3	Decision-Making.....	40
<b>6</b>	<b>APPENDICES</b> .....	<b>41</b>

## 1 Overview and Purpose

This evaluation should be read in conjunction with Part 1 (refer section 1.4.4 in particular) in order to understand the context and approach for the evaluation and consultation undertaken in the development of the Proposed Auckland Unitary Plan (Unitary Plan). It makes a case for a Unitary Plan that moves away from the incremental approach of the operative Regional Policy Statement (RPS) to a more proactive and integrated approach to growth management. This new approach includes the setting of land supply targets within and outside the existing metropolitan urban areas, and a new policy tool - the Rural Urban Boundary (RUB) with objectives and policies to ensure the staged, orderly growth of Auckland over the long-term to this boundary.

### 1.1 Subject Matter of this Section

The land supply provisions of the Unitary Plan are intended to accommodate residential and business growth in Auckland over the next 30 years, in a way that meets aspirations for a quality compact city with the major share of growth occurring within the existing metropolitan urban area.

This evaluation addresses:

- Unitary Plan provisions that ensure the transition over 30 years to a quality compact Auckland, focused on achieving the Auckland Plan's aspiration of 70 percent of new dwellings within the existing urban area, defined by the 2010 Metropolitan Urban Limit (MUL), with flexibility to accommodate up to 40 percent of new dwellings outside the existing urban area.
- Unitary Plan provisions that focus on achieving a staged and managed approach to the release of new greenfield land for urban development within a new Rural Urban Boundary (RUB).

The Unitary Plan is responding to the now widely-held view that the regional and local policies of the former Auckland councils were not providing an adequate basis for managing Auckland's growing population and economy. Contributing evidence to this perspective includes Auckland's housing crisis<sup>1</sup>, the very rapid increase in property values since the end of the global financial crisis and a shortage of suitable new areas for land-intensive business activities. Research on land value differentials inside and outside the MUL further suggest significant demand for land at the periphery if it were made available<sup>2</sup>.

Auckland's population growth is expected to continue, reaching 2.5 million by, or a few years after, 2040.

To house the growing population, the Auckland Plan expects the majority of dwelling supply in the future to be inside the metropolitan urban area. In the period 2006-2012<sup>3</sup>, over 11,500 dwellings were built in the existing urban areas, either on vacant sites, as infill development or on business land. This is a rate of 2,875 per annum. By comparison just 3,605 dwellings (900 per annum) were built in the main greenfield areas.

While this shows that Auckland can deliver a higher proportion of dwellings within existing urban areas than at the edge, the Auckland Plan expects dwelling delivery in the existing

---

<sup>1</sup> Auckland Council, Housing Strategic Action Plan Stage 1, December 2012, Page 10, Section 1.1

<sup>2</sup> Grimes, A & Liang, Y (2007) Spatial Determinants of Land Prices in Auckland: Does the Metropolitan Urban Limit Have an Effect, MOTU research paper

<sup>3</sup> The Auckland Council Capacity for Growth Study 2012, Page 17, Table 7

urban areas at a rate up to 8,000 dwellings per annum, well over twice the 2006-2012 annual delivery rate. The Unitary Plan has to fundamentally change the policy approach to land delivery in the urban areas for these targets to be met.

In addition to meeting targets, the Auckland Plan expects a strongly centres-based approach to dwelling supply in the city centre, city centre fringe, metropolitan, town and local centres. Evidence<sup>4</sup> shows that much of the dwelling supply in recent years (71percent) has been provided on vacant land and as infill development across the residential areas of Auckland, with a smaller proportion (29percent) provided on business zoned land including centres, much of that in the city centre itself. Attempts to develop higher intensity residential options in centres have usually meet with strong local opposition, either failing as a result or proceeding but settling for lower dwelling yields than originally sought. The Unitary Plan has to provide the zoning and rules framework to enable a quality compact form for Auckland with an emphasis on centres intensification.

Turning to the current supply situation and land delivery outlook for greenfield areas, the combined dwelling capacity of Auckland's recognised major greenfield areas, is around 38,000 dwellings. Of this 8,000 dwellings had been delivered by 2012, leaving capacity for a further 30,000 dwellings.

While this figure may seem high, Section D of the Auckland Plan<sup>5</sup> expects greenfield land delivery in the ten years to 2021 of 47,000 dwellings at 4,700 dwellings per annum. This means that the remaining greenfield land supply enabled by the RPS will be consumed in just over 6 years. After 2021, between 45,000 greenfield dwellings are to be delivered in the ten years to 2031. This requires delivery of around 4,500 dwellings per annum.

Periodic adjustments to the Metropolitan Urban Limits (MUL) between 1999 and 2013 saw delivery potential created for 12,000 new dwellings, enabling the delivery of around 3,000 dwellings per annum. The existing greenfield areas and periodic extensions to them through changes to the urban limits under the RPS will simply not meet the required targets. More pro-active land supply policies are required to meet these requirements.

Following the establishment of Auckland Council (November 2010) a new approach to managing growth was investigated and established as council policy in the Auckland Development Strategy (Section D of the Auckland Plan 2012). This new approach was based on the following propositions:

- Auckland needed to have a guaranteed land supply for a longer period – under the Auckland Plan this is a 30 year supply of land and development capacity, within the integrated 30-year strategy for growth and development (Local Government (Auckland Council) Act 2009, section 79).
- A quality compact urban form for Auckland with continued emphasis on quality intensification, but expanded to include broader areas of intensification or up-zoning beyond the legacy council approach. The quality compact Auckland was strongly supported by a majority of Aucklanders and Auckland stakeholders throughout the Auckland Plan.
- Economic evidence in support of a quality compact form includes the cost of servicing developments with infrastructure (brownfield vs greenfield)

---

<sup>4</sup> The Auckland Council Capacity for Growth Study 2012, Page 17, Table 7

<sup>5</sup> The Auckland Plan Section D - Auckland's High Level Development Strategy, Page 56, Figure D7

developments), agglomeration benefits (for employment density), market preferences (e.g. business location), and house price increases in central areas relative to peripheral areas. Investors and talent (including internationally mobile skilled workers) who Auckland needs to attract, place a premium on quality places, urban amenity, accessibility to key transport infrastructure, and employment diversity that can only be found in or around major centres.

The intent in the Auckland Plan and the Unitary Plan is for 70 percent of the required new dwellings to be located inside the 2010 Auckland Metropolitan Urban Area baseline through quality developments utilising existing capacity (vacant land and redevelopment opportunities) as well as new capacity from significant up-zoning in areas with good access to employment centres and the frequent transport network.

While the Capacity for Growth Study (November 2012) indicates significant remaining capacity in the existing core urban area, it is not considered sufficient for the 70 percent figure to be achieved due to capacity of location not being aligned with demand and preferences. Views differ on exactly how much additional capacity is needed but further iterations of the Capacity for Growth study will provide an important basis for forecasting uptake of Unitary Plan capacity.

Correspondingly, between 30 and 40 percent of new dwellings will be located outside the Metropolitan Urban Area, within the Rural Urban Boundary, rural and coastal villages and general rural areas. The Rural Urban Boundary (RUB) replaces the Metropolitan Urban Limit (MUL) and includes some important differences. The RUB is intended to be a defensible, permanent rural-urban interface and not subject to incremental change. It provides for 30 years or more of urban development, rather than ten-fifteen years or less that the MUL extensions allowed for. There will also be tighter controls on rural subdivision outside the urban boundary.

There will also be at least 1,400 hectares of new business land (additional greenfields land provided between the MUL and RUB), as well as places for new mixed use business centres to ensure employment opportunities within or close to the new neighbourhoods.

## **1.2 Resource Management Issue to be addressed**

Part 2 of the RMA provides for the use, development and protection of natural and physical resources, in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety.

By 2041, it is estimated that an additional 400,000 dwellings and 300,000 jobs will be required to support an additional 1 million people living and working in Auckland<sup>6</sup>. Approximately 1,400 hectares of additional greenfield land will also be required to provide for business activities<sup>7</sup> (in particular large-scale industrial activities) providing future employment opportunities for Aucklanders.

To accommodate an additional 400,000 new dwellings over the next 30 years a sufficient supply of greenfield land and additional development capacity in existing urban areas needs to be assured in order to provide for the Auckland communities' overall economic, social and cultural well-being.

---

<sup>6</sup> Page 26, Auckland Plan 2012, population projections from Statistics NZ

<sup>7</sup> Page 48 the Auckland Plan 2012

The importance of sufficient supply of land and development capacity has been recognised in resource management reform<sup>8</sup> discussions. The effective functioning of the built environment, including the availability of land for urban expansion, use and development is proposed to be included into the RMA principles (new section 7) in order to guide decision-makers on how to manage resources sustainably<sup>9</sup>.

The Draft Auckland Housing Accord and its supporting legislation, the Housing Accords and Special Housing Areas Bill (2013) reiterate the importance of this issue at both a local and national level.

### 1.3 Significance of this Subject

The size of Auckland and its expected population and business growth within the national context make land supply and the provision of adequate development capacity significant matters. If Auckland cannot meet these requirements the ability of the development sector and business community to provide dwellings and business premises may be very limited. Central Government views these matters with concern and has already moved to enact legislation (described above) to address initially the housing crisis.

The Auckland Housing Accord is expected to play a key role in land supply and intensification within the first three years of notification of the Unitary Plan. However, the Accord will not replace the Unitary Plan which still has to have appropriate provisions to meet Auckland’s forward land supply and development capacity requirements.

### 1.4 Auckland Plan

The Local Government (Auckland Council) Amendment Act 2009 (s. 79) requires the Auckland Plan to “enable coherent and co-ordinated decision making by the Auckland Council and other parties to determine the future location and timing of critical infrastructure, services, and investment within Auckland in accordance with the strategy.”

The Auckland Plan utilises an evidence-based approach which, together with extensive public consultation (including a special consultative procedure), resulted in a long term strategy for Auckland’s growth and development over the next 30 years. The strategy is seeking a quality compact urban form in which 70 per cent of residential and employment development occurs within the 2010 MUL while 30 or if necessary, 40 percent occurs within the RUB, coastal settlements and villages and general rural locations.

Table 1 below indicates the future distribution of dwellings and employees by location over the next 30 years. Figure D.6 of the Auckland Plan outlines the expected distribution of dwelling land supply for 30 years to 2041.

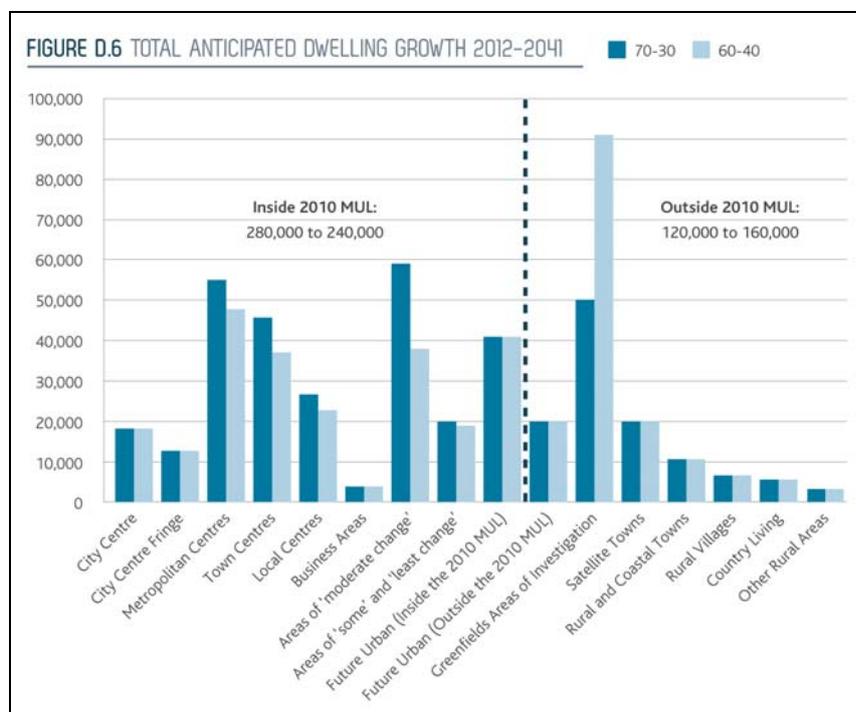
<b>Location</b>	<b>Total additional housing capacity (dwellings) required</b>	<b>Total additional employment capacity required (FTE)</b>
In existing urban core <sup>10</sup> (70 percent)	280,000	190,000

<sup>8</sup> Ministry of the Environment (2013). *Improving our resource management system: A discussion document*. Wellington: Ministry for the Environment

<sup>9</sup> Ibid Page 37

<sup>10</sup> Based on baseline Metropolitan Urban Area 2010

Outside existing urban core (up to 40 percent)	160,000	110,000
Greenfield areas of Investigation	90,000	61,000
Satellite towns (excluding greenfield extensions)	20,000	14,000
Rural and coastal towns	10,000	7,000
Rural villages and general rural.	20,000	14,000
Pipeline greenfield currently outside metropolitan urban area 2010	20,000	14,000



At any point in time, the Auckland Plan requires<sup>11</sup> that there be 7 years average supply of unconstrained 'ready to go' land supply (land with an operative zoning and bulk services infrastructure in place). The Unitary Plan must enable this scale, location and availability of land for dwelling delivery, while still ensuring quality outcomes and the effective management of other resource management issues.

### 1.5 Current Objectives, Policies, Rules and Methods

The existing Auckland RPS has an objective for a quality compact urban form (Section 2.6.1). Six strategic priorities are identified (Page 24) each of which has an associated range of policies and methods. The successful application of these policies and methods was expected to have a range of results including:

<sup>11</sup> The Auckland Plan, Section D - Auckland's High-level Development Strategy, Paragraph 138

- significant intensification of the urban area (defined as land within the 1999 MUL);
- the provision of 20 years of capacity for urban development through the region (Method 2.6.6.2 in particular);
- greater housing affordability, choice and range as well as protection and improvements of some environmental issues.

If the RPS already contains objectives, policies and methods for a quality compact urban form and a 20-year capacity requirement, it could be asked why these provisions are not simply carried over into the Unitary Plan. The RPS pre-dates the Auckland Plan. Unlike the RPS, the Unitary Plan, in keeping with the Auckland Plan, takes a 30-year outlook using the RUB and providing for sufficient appropriate zoning in existing urban areas to achieve longer term targets by location and time.

The RPS in particular does not include objectives, policies and methods relating to land supply, and focuses on development capacity within existing urban areas. It leaves greenfield land supply largely to developer driven initiatives as and when they occur with no attention to location or the scale of delivery. This makes it difficult for infrastructure providers to programme infrastructure provision and funding over time.

A long-term and integrated approach with clear land supply targets and sequenced release is considered necessary in order to sustainably manage urban growth in Auckland, whilst avoiding and managing its adverse effects. A number of Unitary Plan provisions support this approach such as the use of a future urban zone, residential and business provisions. The intention is for land use and infrastructure decisions to be considered together using a combination of regulatory and non-regulatory tools.

The development capacity land supply rationale needs to be seen as part of a wider approach set out partly in the Unitary Plan, but also in other legislative obligations and non-regulatory functions of the council and Auckland stakeholders. These include but are not limited to:

- The *Draft Auckland Housing Accord* and the *Housing Accord and Special Housing Areas* legislation. These commit Auckland to achieving specific housing targets over the next three years, with the legislation giving immediate effect to some of the zoning changes in the Unitary Plan, and enabling fast track consenting processes.
- The councils long-term plan and the plans of council controlled organizations supporting the staging and delivery of serviced land inside the RUB in a way that achieves efficiency and a reasonable degree of certainty for land owners and developers.
- An emerging land release strategy and associated forward land and infrastructure delivery programme which will provide the critical links between the Auckland Plan, the Unitary Plan and long-term plan to ensure a quality compact form can be successfully achieved.

The RPS failed to make these fundamental connections between policy instruments.

## **1.6 Information and Analysis**

The approach to land supply and development capacity in the Unitary Plan is based on numerous technical analyses and reports already described in this evaluation.

### **1.7 Consultation Undertaken**

The Auckland Plan as the primary basis for the Unitary Plan involved a comprehensive public consultation and engagement process, including the special consultative procedure. Throughout the preparation and development of the Auckland Plan, the council involved iwi and Maori, central government, infrastructure providers, Auckland's communities, the private sector, the rural sector and numerous other parties such as professional associations, the education sector and youth). Council took the opportunity to work with business, community and government to co-produce Auckland's first spatial plan in a spirit of partnership and collaboration that reflected international best-practice.

The development of the Unitary Plan itself has been based on extensive stakeholder and public consultation, together with political decision-making. Initial consultation for the Unitary Plan began in October 2011 and until August 2012 represented a targeted and prioritised engagement approach. From September 2012 onwards consultation on the Unitary Plan has followed an enhanced engagement programme. Consultation undertaken has been over and above the statutory requirement set out in Clauses 2 - 3C in Schedule 1 of the RMA. Details of the consultation programme for the Unitary Plan are outlined in Section 1 of wider section 32 report. Consultation on the land supply approach taken in the Unitary Plan was undertaken with iwi, the Department of Conservation, Auckland Conservation Board, adjoining Local Authorities, Local Boards, infrastructure providers, various stakeholders and the community.

### **1.8 Decision-Making**

Initially an issues paper outlining issues facing growth in the region went before the Unitary Plan Political Working Party (PWP). Using these issues papers and direction provided by the PWP, an outcomes matrix were developed. The PWP, Local Boards and Council Controlled Organisations were able to amend and add to the outcomes matrix. Tensions between competing outcomes were identified and were addressed by the PWP. The outcomes matrix was used as the base for developing the provisions of the Unitary Plan, including the Future Urban Zone. The Future Urban Zone is a key zone in relation to land supply. The provisions of the Unitary Plan which relate to greenfield development and land supply were endorsed by the PWP on a number of occasions.

### **1.9 Proposed Provisions**

Refer below for detail relating to objectives and policies.

### **1.10 Reference to other Evaluations**

This section 32 report must be read in conjunction with the following evaluations:

- 2.2 Rural urban boundary location
- 2.3 Residential zones
- 2.4 Business
- 2.21 Affordable housing
- 2.22 Future Urban zone
- 2.23 Greenfield Urban precincts
- 2.35 Rural subdivision

## **2 Objectives, Policies and Rules - Development capacity and supply of land for urban development**

### **2.1 Objectives - Development Capacity and Supply of Land for Urban Development**

Development capacity and land supply is addressed primarily through **RPS 2.3 - Development capacity and supply of land for urban development**. The RPS sets out objectives and policies to enable sufficient land for new housing and businesses to be provided over the next 30 years, to support anticipated population and business growth. It

also outlines how council will monitor land supply and the process for releasing land within the RUB for urban development.

The Unitary Plan objectives seek to provide for up to 70 percent of new dwellings over 30 years to be located within the existing metropolitan areas, defined by the baseline 2010 Metropolitan Urban Area. There is flexibility for up to 40 percent of new dwellings to be located outside the 2010 Metropolitan Urban Area if the 70 percent figure cannot be achieved. The Unitary Plan requires this growth to be managed in a staged and orderly manner.

The following objectives are proposed:

- 1. Sufficient development capacity and land supply to accommodate projected population and business growth.*
- 2. Up to 70 per cent of total new dwellings by 2040 occurs within the metropolitan area 2010.*
- 3. Up to 40 per cent of total new dwellings by 2040 occurs outside of the metropolitan urban area 2010.*
- 4. The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.*

The objectives provide time for Auckland and its housing market to adapt to more intensive land uses over the long-term. These objectives make possible the achievement of Auckland's land and housing supply targets.

## **Appropriateness of the Objectives**

### **Relevance**

Consistent with Auckland Plan objectives for a quality compact city, there is an emphasis on quality intensification, with up to 70 percent of total dwellings to be provided within the existing metropolitan urban area. Targets for total new dwellings by 2040 are provided through Objectives 2 and 3. This is intended to help create quality places and neighbourhoods where people want to live, work and play. The urban form is expected to make more effective and efficient use of land resources and infrastructure networks. Improving the quality of urban design together with a mix of uses and densities will also improve economic competitiveness and support greater productivity.

Allowing for 30-40 percent of urban growth outside of the existing urban areas will ensure sufficient land supply for urban growth in Auckland over the next 30 years. This provides a more flexible and balanced approach to growth management compared with past regional approaches. This recognises that there will need to be a transition to a quality compact Auckland over time, with Auckland's first notified Unitary Plan an important first step in this journey.

Objective 4 provides for urban growth to occur in an orderly, timely and planned manner in areas zoned future urban within the RUB. This means that new infrastructure, such as water and wastewater infrastructure networks, can be planned and used more efficiently in support of land supply. This objective is appropriate as it allows for funding and planning of infrastructure to be focused in specific locations.

Consolidating growth in planned locations also means that urban growth can be avoided in more sensitive locations maintaining valuable productive rural land outside of the RUB.

The Objectives in RPS 2.3 are considered to be consistent with the requirements of Part 2 - Purpose and Principles of the RMA.

### **Usefulness**

The development capacity and supply of land for urban development objectives contribute to the long term outcomes identified in the Auckland Plan and closely link to the other issues of regional significance, i.e. **Issue 2: Enabling economic well-being**.

Objective 1 provides an overall aim for development capacity and land supply - to accommodate projected population and business growth. It applies to infill and brownfield development within the existing metropolitan area as well as greenfield development of land zoned future urban within the RUB.

Objectives 2 and 3 provide clarity, by identifying a target for the proportion of total new dwellings both inside and outside the metropolitan urban area 2010, over the next 30 years. The expectation is that there will be a higher proportion of new dwellings inside the metropolitan area 2010, than outside the metropolitan area 2010. The targets and spatial allocation provides clarity and direction for land owners, communities, developers and infrastructure providers and facilitates the transition to quality compact urban form for Auckland. This is a more proactive approach as it identifies land for future urban development through the future urban zone and the RUB.

A balance between intensification within the existing metropolitan area and new urban development in greenfield areas over the next 30 years is also provided through these two objectives.

Objective 4 requires development of land zoned future urban within the RUB to occur in an orderly, timely and planned manner. A sequenced approach will help determine the future location and timing of infrastructure services and investment. It will link land development and infrastructure investment to a clear sequence and timeframe. It will also greater certainty about where and when urban development is to occur. Structure planning is an important tool to help support this approach and enable successful development to occur 'on the ground'.

Objectives 2, 3 and 4 also set out a fiscally responsible approach to growth management. Infrastructure upgrades within the existing urban area to support the major part (70 percent) of growth and new infrastructure for greenfield development areas, require forward planning and substantial financial investment. A clear target over 30 years allows greater certainty and more effective use of infrastructure investment in Auckland.

### **Achievability**

The Council is undertaking analysis to identify greenfield land within the RUB to prioritise areas for structure planning and subsequent land release through the Council's Forward Land & Infrastructure Programme (FLIP) and associated Land Release & Development Capacity Strategy. The identification of Special Housing Areas (SHA) under the Housing Accord legislation are a further tool that will help achieve the Unitary Plan objectives for land supply and development capacity. The FLIP will identify key constraints to land supply and intensification and establish timeframes and responsibilities for their resolution. It will be supported and funded through the council's Long term Plan and Annual Plan.

Council will seek to ensure sufficient development capacity and land supply (refer Objective 1) through undertaking further sub-regional analysis. This analysis will be prepared by council in conjunction with stakeholders to integrate and prioritise land delivery, as well as investment in infrastructure to support the development of brownfield and greenfield land.

Progress on how much land has been taken up and the remaining capacity will be closely monitored by the council through an annual report on Auckland's development capacity in all categories of land (refer Objectives 2 and 3).

For the greenfield growth component (30-40 percent), the zoning of land for urban uses within the RUB will be introduced by way of plan changes based on structure planning processes. Appendix 1 of the Unitary Plan contains the structure plan requirements for future urban zoned greenfield land within the RUB. This is an important supporting tool to ensure the conditions for successful transition to urban development are in place and able to be implemented (refer Objective 4).

Note that Special Housing Areas (SHAs) under the Housing Accords and Special Housing Areas legislation offer a fast-track consenting process for qualifying developments within identified greenfield and brownfield areas, which will also assist with achieving these objectives, particularly Objective 1.

### **Reasonableness**

The land supply objectives provide a reasonable and balanced approach to accommodating Auckland's growth over the next 30 years.

There is a balance between new dwellings within and outside of the existing metropolitan urban area that is generally consistent with supply trends. During the 10 year period 1996 to 2006, approximately 35 percent of new dwellings were constructed in greenfield areas, and 65 percent by way of infill and redevelopment<sup>12</sup>. This approach also contributes to protecting rural amenity and rural productivity.

The supply of unconstrained 'ready-to-go' development capacity and land supply is one of the many factors influencing housing affordability in Auckland. Planning policies can influence the location, size and scale of business activities and the type and cost of residential land and dwellings<sup>13</sup>. Subsequently, there can be significant benefits with enabling sufficient development capacity and supply, and significant costs associated with insufficient or constrained supply<sup>14</sup>. Objective 1 seeks to ensure there is sufficient development capacity and land supply to keep up with population growth and business growth. This objective is reasonable as it supports providing housing and land to support employment opportunities across Auckland. It may be seen as financially risky to have the Auckland Plan requirement for an average 7 years 'ready to go' land (land with an operative zoning and bulk services infrastructure in place) available for development at any given time. Auckland's housing crisis demands a focus on a ready supply of land, as one measure to assist housing and business land delivery and address affordability issues. Future analysis and improvements in the efficiency of the housing delivery process may warrant a reduction in the years supply requirement, where land can be bulk serviced closer to the time at which it is actually developed.

The approach outlined in the Unitary Plan provides greater certainty for developers and landowners in both urban and rural areas.

---

<sup>12</sup> Hill Young Cooper (June 2011) Towards a Preferred Urban Form

<sup>13</sup> Australian Government Productivity Commission (May 2011) Performance benchmarking of Australian Business Regulation: Planning, Zoning & Development Assessments, Urban Land Supply Policies and Strategies chapter

<sup>14</sup> NZ Productivity Commission (March 2012) Housing Affordability Inquiry

## **Council functions & powers**

It is considered that the objectives and policies under the **RPS 2.3 - Development capacity and supply of land for urban development**, will assist the Council in achieving the integrated management of natural and physical resources (section 30(1)(a) of the RMA) and in managing environmental effects that are of regional importance (section 30(1)(b) of the RMA). For example, the land to be supplied will have been identified through the determination of the RUB location to minimise avoidable adverse effects on the natural environment and retain other areas for rural productive use and rural character. The more fine-grained structure planning process provides further opportunity to protect important local values and character within future urban developments.

These provisions are also consistent with the council's territorial functions of integrated management under section 31 of the RMA, particularly section 31(1)(a). The proposed provisions are consistent with section 59 as they assist in providing an overview of region-wide issues and with section 61 of the RMA given their consistency with the Auckland Plan.

### **2.1.1 Policies**

There are seven policies in RPS 2.3 supporting the development capacity and land supply objectives.

The following policies are proposed:

- a) *Policy 1 - Providing an average seven years supply of unconstrained land for residential and business growth*
- b) *Policy 2 - Enabling continued rural use of land within the RUB prior to structure planning and plan change processes*
- c) *Policy 3 - Ensuring urban development avoids highly valued areas, sites, features or resources, and areas prone to natural hazards*
- d) *Policy 4 and 5 - managing the staging of structure planning and rezoning of future urban zoned land to achieve certain principles and requiring the coordination of infrastructure (provision and upgrades) prior to approval of a development*
- e) *Policy 6 - requiring the provision or upgrading of infrastructure to be co-ordinated with sequencing and delivery of development,*  
*Policy 7 - enabling growth in future urban zone whilst protecting existing significant infrastructure from reverse sensitivity effects.*

The policies in combination provide a strong base for the pro-active, managed supply of land to meet the targets set out in the objectives. Without them, there is the risk that meeting development capacity and land supply objectives will be left to chance and be driven by particular development initiatives as they arise. This approach seeks to provide greater overall scope for the development sector and housing market to operate efficiently by giving more long-term certainty about where Auckland will and will not grow.

Policy 4 requires the staged release of land using the structure planning and plan change process in areas zoned future urban within the RUB. This is an effective way to ensure that land use and infrastructure decisions are made in an integrated way. The policies are designed to ensure that urban development of greenfield land within the RUB occurs in a orderly, timely and planned manner. Policy 5 requires the provision or upgrading of significant infrastructure to be co-ordinated with the structure and sequencing of growth and development, and planned and funded prior to the approval of an activity and/or development. This will assist with achieving greater alignment and a more effective process for increasing development capacity and land supply, while also making best use of the limited funding available for new infrastructure.

Policy 4 and 5 will also help support the implementation of the RUB once it has been finalised. Land within the newly defined RUB which has yet to be developed will be rezoned to 'future urban'. This rezoning will protect this land for future urban development and will be rezoned to "live" urban zones following a structure planning process. The protection of this land from inappropriate development and subdivision is necessary to avoid shortages in land supply or a compromised urban form. Land delivery processes are also critical to the success of the RUB and will help ensure a timely supply of land can be zoned, serviced, and delivered to the market over the lifetime of the Unitary Plan and beyond.

Policies 6 and 7 require sequencing and staged release of greenfield land in coordination with infrastructure provision. They support Objective 4 - The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.

The implementation of these policies will be strongly supported by the Council's sub-regional analysis including the Council's Forward Land and Infrastructure Programme which will facilitate the staged and orderly delivery of serviced land across Auckland to meet Auckland Plan (long-term 30 year targets) and Auckland Housing Accord targets (short-term 3 year targets). This sub-regional analysis will provide the connection between the land use provisions of the Unitary Plan and the planning, funding and delivery of supporting infrastructure that takes place through a wider range of processes, including the council's Long-term plan, Annual Plan and Asset Management plans.

### **2.1.2 Rules**

Given that these provisions are at the Regional Policy Statement level, there are no rules that are directly related to the above objectives and policies.

### **2.1.3 Costs and Benefits of Proposed Policies and Rules**

The development capacity and land supply provisions in the Unitary Plan take an integrated approach to resource management, in order to efficiently and effectively address the challenges and complexities of growth and development in Auckland over the next 30 years. As New Zealand's largest city, it is essential that the opportunities and challenges high growth brings are managed effectively in a way that maximises beneficial outcomes for all Aucklanders, and protecting those aspects Aucklanders value the most.

The land supply approach proposed in the Unitary Plan, combining a long term rural urban boundary (the RUB), with targets for dwellings inside and outside the metropolitan urban area 2010 together with an orderly, timely and planned land delivery process. This is considered to offer a more robust urban growth management process than other options. The approach is considered to be more pro-active, enabling and integrated when compared with retaining the operative RPS provisions or taking a less regulated approach. Together with the RUB provisions and targets, the land supply objectives and policies will provide greater certainty to Auckland's communities, infrastructure providers and the development sector about the timing and location of growth, while still ensuring all environmental safeguards are in place.

### **2.1.4 Adequacy of Information and Risk of Not Acting**

It is considered that there is sufficient information on which to base the proposed policies and objectives. Refer section 5.1 for detail.

## **2.2 Objectives - Rural Urban Boundary growth management tool**

The following objectives are proposed:

### Objectives - 2.1 Providing for growth in a quality compact urban form

*1. A quality compact urban form with a clear defensible limit (Rural Urban Boundary - RUB) to the urban expansion of the metropolitan area, satellite towns, rural and coastal towns and serviced villages.*

*2. Urban growth is primarily focussed within the metropolitan area 2010.*

*3. Land within and adjacent to centres, frequent public transport routes and facilities is the primary focus for residential intensification with a lesser degree of intensification in surrounding neighbourhoods.*

*4. The focus for urban growth outside of the metropolitan area 2010, is greenfield land within the RUB that is contiguous with the urban area and the satellite towns of Pukekohe and Warkworth.*

**Relevance** - The Unitary Plan adopts a quality, compact model for Auckland, which underpins its approach to development and intensification. This will help meet the demands of a growing population by setting a clear limit to accommodate 30 years of growth. By identifying a clear limit and focus to the urban expansion of Auckland, these objectives aim to enable people and communities to provide for their economic and cultural well-being and for their health and safety (section 5 RMA), through adequate land supply, while protecting natural resources, and safeguarding the potential of natural and physical resources to meet the needs of future generations. The RUB aims to limit the impacts on key components of the rural economic systems to allow them to prosper; by avoiding elite soils and known aquifer recharge areas, and avoiding the adverse effects of these activities on the environment.

A quality compact urban form can be tailored to respond to and provide for the matters of national importance set out in section 6 of the RMA, such as preserving the natural character of the coastal environment and protecting outstanding natural features and landscapes from inappropriate subdivision, use and development. The promotion of a quality compact urban form will allow the Council to ensure that such areas are generally free from inappropriate development. These objectives also have regard to the other matters set out in section 7 of the RMA, in particular they can enable the efficient provision of infrastructure, and the maintenance and enhancement of amenity values.

**Usefulness** - The first three objectives state that the RUB will clearly identify where urban development can and cannot go, and the priority for most urban development to be located within the existing urban area, thus providing certainty about where future land supply will be. This certainty will assist the development industry and infrastructure providers to plan for and deliver new neighbourhoods and business areas to meet the projected growth, while sustainably managing the rural environment and the interface between rural and urban Auckland. The RUB and the level of growth it accommodates will contribute to the quality compact form that will benefit Auckland.

The fourth objective indicates the way in which a staged release of greenfield land for future residential and business land inside the 2040 RUB will happen. This objective explains that the focus for urban growth outside of existing urban areas, will be within the RUB, and contiguous with existing urban area, and Pukekohe and Warkworth.

**Achievability** - The RUB will be used as a method to identify land zoned as Future Urban between the RUB and existing urban areas, and guide Auckland's future development. The RUB identifies 30 years of land for future urban growth, with the Auckland Plan setting up a programme to monitor land release and urban expansion over this period. Success will be indicated by ensuring bulk infrastructure is in place in advance of growth, in the right places at the right time, with sufficient development capacity (zoning and infrastructure in place),

leading to an increase in the supply of housing across Auckland and a quality built environment, that support sustainable communities.

**Reasonableness** - The RUB together with these objectives will help to deliver key benefits of a quality compact form, including improvements in productivity and economic growth, making better use of existing infrastructure, increasing the viability of public transport, while maintaining rural character and productivity and reducing adverse environmental effects.

**Council Powers** - It is considered that the objectives and policies under the RPS Objectives 2.1(1) and 2.1(2) will assist the Council in achieving the integrated management of natural and physical resources (s30(1)(a) of the RMA) and managing environmental effects that are of regional importance (s31(1)(b) of the RMA).

They are also consistent with the Council's territorial functions of integrated management under s31 of the RMA, particularly s31(1)(a). The provisions are also consistent with s59 as they assist in providing an overview of region-wide issues and with section 61 given their consistency with the Auckland Plan.

## **2.2.1 Policies**

### Policy 2.1 Providing for growth in a quality compact urban form

*1. Concentrate urban activities within, the metropolitan area 2010, the RUB, the satellite towns, rural and coastal towns and serviced villages.*

The above policy directs urban activities to be located and concentrated within the RUB around the metropolitan urban area, the satellite towns, rural and coastal towns and serviced villages, and the urban zones of the un-serviced rural and coastal villages. This reinforces the objectives, stating the types of activities that will be focused inside of the RUB. Further related policies discuss increasing density and encouraging residential intensification. The explanation in the Unitary Plan goes on to list the benefits of a compact urban form.

## **2.2.2 Rules**

Given the RUB sits at a Regional Policy Statement level, there are no rules that are directly affected by the above stated objectives and policies.

## **2.2.3 Costs and Benefits of Proposed Policies and Rules**

The imposition of a RUB is considered to be a more appropriate method to achieve the desired orderly release of greenfield land across the Auckland region than the either the existing MUL process or a laissez-faire uncontrolled growth.

The orderly, controlled nature of the RUB, will ensure that greater security of development capacity and land supply is provided to the development sector, infrastructure providers, and the wider community, while also ensuring the efficient use of funding available for land development. This increased security and certainty will have positive flow on effects to the economy as discussed in Section 3 of this report.

## **2.2.4 Adequacy of Information and Risk of Not Acting**

It is considered that there sufficient information on which to base the proposed policies and methods.

## **2.3 Objectives**

### Objectives - 2.5 Rural and coastal towns and villages

- 1. Growth in towns and villages is sustainable and efficient, capturing and enhancing the local character and sense of place of the town or village and the surrounding area.*
- 2. Growth within un-serviced villages is contained within their urban zones existing at 2013*
- 3. Growth in towns and serviced villages is contained within the RUB.*
- 4. New towns and villages are avoided outside the RUB.*

**Relevance** - The sustainable growth of these communities as controlled by the imposition of a RUB growth tool is consistent with Part 2 of the Act. It allows for the sustainable management of physical and natural resources, as it provides for the needs of communities while also maintaining important aspects of the natural environment.

Sufficient land for new urban development will be needed for Auckland's towns and serviced villages in order to accommodate population growth and ensure an adequate supply of housing stock in these areas.

These towns and villages are often located in attractive rural and coastal locations and are under pressure to both maintain both their current character and cater to increased market demands for growth.

Furthermore, a co-ordinated approach to the growth of these settlements is needed to ensure appropriate infrastructure investment. Given the small population size of many of these settlements, their distance from metropolitan Auckland, and the sensitivity of their local environments, infrastructure investment is often a costly procedure.

Therefore, it is preferable to make use of existing infrastructure investment, such as schools and wastewater plants, than build new facilities in currently unserviced communities.

Using the RUB process allows for the planning of an appropriate level of growth in serviced communities while utilising a full range of information.

Consolidating growth within these existing settlements and avoiding the establishment of new settlements also looks to prevent the creation of de-facto urban sprawl in rural areas.

Given the high projected population growth for Auckland, the establishment of growth controls and the RUB for these settlements works in conjunction with the RUB for Metropolitan Auckland, works to prevent urban sprawl through new settlements in rural areas.

**Usefulness** - The imposition of this objective works in conjunction with those objectives that seek to manage the growth of Metropolitan Auckland. Given the growth pressures facing the region and the high amenity of Auckland's rural and coastal areas, these locations would be under high pressure to develop and take some of the sprawl from Metropolitan Auckland. To prevent this from occurring and to support the establishment of the RUB, it is necessary to impose these objectives of both existing and possible future rural and coastal settlements.

**Achievability** - As Stage 4 of the RUB study, the Council will undertake an analysis of all rural and coastal towns, and serviced villages. This stage of the RUB study will establish a RUB around each of these settlements. By examining these settlements as a collective, the interrelationships between these settlements and the wider Auckland area can be taken into account.

Following the establishment of the RUB around each of these settlements, a process of sub-regional prioritisation, structure planning, rezoning, and infrastructure investment can occur.

**Reasonableness** - The establishment of a RUB around these settlements will help ensure that their growth is undertaken in a complementary manner to their existing character and physical environment. It will also allow for the best use of existing infrastructure and future infrastructure funding.

The restriction of growth in unserviced villages will help limit the need for costly rural infrastructure investment and allow for the targeting of such investment in affordable locations.

The further avoidance of new towns and villages will also support the continued viability of existing settlements, prevent urban sprawl into rural areas, and limit the need for new infrastructure outside existing populated areas. It will also help protect the productive and environmental values provided by Auckland's rural areas.

Overall, the establishment of this objective allows for increased growth and commercial activity in these locations while also ensuring the protection of Auckland's rural environment and economy.

**Council Powers** - It is considered that the objectives and policies under the RPS Objectives 2.5(1), 2.5(2), 2.5(3), and 2.5(4) will assist the Council in achieving the integrated management of natural and physical resources (s30(1)(a) of the RMA) and managing environmental effects that are of regional importance (s31(1)(b) of the RMA).

They are also consistent with the Council's territorial functions of integrated management under s31 of the RMA, particularly s31(1)(a). The provisions are also consistent with s59 as they assist in providing an overview of region-wide issues and with section 61 given their consistency with the Auckland Plan.

### **2.3.1 Policies**

#### **Policies 2.5 Rural and coastal towns and villages**

1. *Require proposals for expanding existing rural and coastal towns and serviced villages, that have efficient and well-performing wastewater facilities with additional or planned and funded capacity, to be developed in a manner that:*
  - a. *achieves an orderly and contiguous connection with the existing settlement*
  - b. *achieves a clear break between other nearby towns and villages*
  - c. *incorporates affordable, feasible, sequenced and funded social and physical infrastructure*
  - d. *provides high resilience to future risks, avoiding locations with significant natural hazard risks for urban development*
  - e. *avoids urbanisation of elite and prime land, and maintains adequate separation between incompatible land uses*
  - f. *achieves high environmental performance and a high quality built environment*
  - g. *reinforces and enhances natural and physical characteristics, including the coastal environment*
  - h. *has good accessibility and improves transport options, including walking and cycling*
  - i. *enables papakāinga, marae developments, customary use, cultural activities and appropriate commercial activities on Māori land and on other land where Mana Whenua have collective ownership interest*
  - j. *is in accordance with the structure plan guidelines in Appendix 1*
  - k. *avoids identified sites and places:*
    - i. *of significant ecological or heritage values*

- ii. *of significance to Mana Whenua*
- iii. *of outstanding natural features and landscapes*
- iv. *of outstanding or high natural character*
- v. *with significant mineral resources*
- vi. *within an electricity transmission corridor.*

2. *Manage development in unserviced rural and coastal villages in a manner that:*

- a. *provides for limited business development on a scale that serves the surrounding rural community*
- b. *provides opportunities for local recreation*
- c. *reinforces and enhances the defined natural and physical characteristics, including rural and coastal values associated with the village*
- d. *encourages development of existing vacant lots*
- e. *enables papakāinga, marae developments, customary use, cultural activities and appropriate commercial activities on Māori land and on other land where Mana Whenua have collective ownership interest.*

3. *Require any proposal for a new town or village outside of the RUB to go through a plan change process and to demonstrate that it:*

- a. *meets Policy 1 with the exception of 1e.*
- b. *does not compromise the achievement of the objectives and policies in Part. 2.2.1: Providing for growth in a quality compact urban form*
- c. *can provide and fund the infrastructure requirements of the proposed development as well as any future planned development*
- d. *can demonstrate sufficient demand for additional urban land within the sub-regional area*
- e. *can provide accessible and adequate transport connections*
- f. *is in accordance with the structure plan guidelines in Appendix 1*
- g. *achieves environmental restoration and enhancement of degraded areas with an overall net benefit*
- h. *provides attractive public open space, walking and cycling opportunities.*

The above policies direct urban activities to be located and concentrated within the RUB around the, rural and coastal towns and serviced villages, and the urban zones of the unserviced rural and coastal villages. This reinforces the objective, stating the types of activities that will be focused inside of the RUB and the prevention of urban-type sprawl in rural and coastal areas. Further policy is given in relation to new settlements ensuring that the full spectrum of resource management issues are addressed before such settlements can be established.

The policy approach of the draft UP requires significant infrastructure to be planned and funded prior to approval for development. The Operative RPS requirement was to demonstrate that the extension can be efficiently connected to existing infrastructure or new infrastructure, which offers a weaker test than that of the Unitary Plan.

### **2.3.2 Rules**

Given the RUB sits at a Regional Policy Statement level, there are no rules that are directly affected by the above stated objectives and policies.

### **2.3.3 Costs and Benefits of Proposed Policies and Rules**

The imposition of a RUB on serviced rural and coastal settlements represents at the management, at a smaller individual scale, the appropriate management of growth effects on these communities.

Growth in these communities can place significant stress on public funds and undermine the economic viability of these locations due to the need to recoup the costs of infrastructure investment. In addition, these settlements each have their own physical characteristics that underpin their desirability and economic function. By controlling growth in each of these locations, greater economic certainty is given to public infrastructure investment while also ensuring that growth and development do not undermine the characteristics that positively contribute to their own local economies and a sense of place.

### **2.3.4 Adequacy of Information and Risk of Not Acting**

It is considered that there sufficient information on which to base the proposed policies and methods.

## **2.4 Objectives**

### **Objective – 3.1 Commercial and industrial growth**

- 1. Employment and business opportunities exist to meet the current and future needs of Aucklanders.*
- 2. Commercial growth is focussed within a hierarchy of centres and identified growth corridors that support the compact urban form.*
- 3. Industrial growth occurs in appropriate locations.*

**Relevance** - These objectives address the requirements of Part 2 of the Act. It allows for the economic wellbeing of the community while ensuring the sustainable management of physical and natural resources.

The adequate supply of business land is a necessary requirement to ensure employment and commercial opportunities for Auckland's growing population.

The Auckland Plan recognised the need to provide 1,400 hectares of additional greenfield land for business activities as part of its wider Development Strategy. In addition to providing for larger footprint for commercial and industrial activities, is a need to ensure that new greenfield areas also include an adequate supply of land for light commercial and non-residential activities in a variety of forms and scales.

The distribution of business land is also an important element for analysis, ensuring that adequate employment opportunities exist across Auckland to provide such benefits as the rationalisation of freight movements, the economic gains of agglomeration and the minimisation of commuter travelling distances.

Business land must also meet a number of specific requirements in order to be a practical location for such development. These requirements and the needs of business must be taken into account when determining the position of the RUB.

**Usefulness** - This objective supports comprehensive decision making in determining the location of the RUB. It allows for inclusion of business and employment issues to be included in land supply development.

**Achievability** - As part of the RUB study, the Council is including the projected employment and business needs, both at a regional and sub-regional level. By taking this approach, it is anticipated that the RUB will contain both adequate Group 1 business land for the next 30 years, as well as an adequate supply of other commercial land opportunities within the future urban area.

**Reasonableness** - It is reasonable to include these land uses and sector requirements in determining the RUB. The RUB is not exclusively for the purpose of residential supply and new business land will be needed to service both existing and future population centres. The failure to include such land use needs would result in a dysfunctional urban form which failed to meet Auckland's economic needs.

**Council Powers** - It is considered that the objectives and policies under the RPS Objectives 3.1(1), 3.1(2) and 3.1(3) will assist the Council in achieving the integrated management of natural and physical resources (s30(1)(a) of the RMA) and managing environmental effects that are of regional importance (s31(1)(b) of the RMA).

They are also consistent with the Council's territorial functions of integrated management under s31 of the RMA, particularly s31(1)(a). The provisions are also consistent with s59 as they assist in providing an overview of region-wide issues and with section 61 given their consistency with the Auckland Plan.

#### **2.4.1 Policies**

*6. Provide for new town and local centres within the **RUB** where they:*

- a. are in proximity to existing or planned medium to high density residential development*
- b. will be appropriately located in relation to the existing network of centres and population growth to achieve a sustainable distribution of centres*
- c. will provide a diverse function and role complementing the established network of centres*
- d. will avoid adverse effects, both individually and cumulatively with other centres, on the distribution, function, viability and amenity of other centres, and on existing and planned infrastructure including the road network, public transport networks and utilities infrastructure*
- e. are of a form and function which is consistent with policy 3*
- f. improve transport choices and reduce trip generation by providing strong connections to a range of transport modes including walking and cycling, and enabling efficient connections to the existing public transport network to link with adjoining centres and identified growth corridors.*

*9. Enable sufficient supply of land for industrial activities, particularly land-extensive industrial activities, where the scale and intensity of effects anticipated in those zones can be accommodated and managed.*

*10. Locate industrial land where it is relatively, and quick and efficient access to freight routes, rail or freight hubs, ports and airports.*

These policies support Objectives 2.3.1 (1), (2), and (3) given their recognition of the needs of business land and its relationship to other land uses, as well as the various scales and forms that business activities can take. These policies also provide adequate criteria to assess possible business land against the wider urban form and its linkages to vital freight networks and distribution hubs.

#### **2.4.2 Rules**

Given the RUB sits at a Regional Policy Statement level, there are no rules that are directly affected by the above stated objectives and policies.

#### **2.4.3 Costs and Benefits of Proposed Policies and Rules**

The use of these policies to support the RUB ensure that adequate consideration is given to the business and employment needs of both the new greenfield areas and the wider Auckland region. This analysis contributes to the stronger economic planning for Auckland's future.

#### **2.4.4 Adequacy of Information and Risk of Not Acting**

It is considered that there sufficient information on which to base the proposed policies and methods.

### **2.5 Objectives**

#### Objective - 3.2 Infrastructure and energy

- 1. A resilient infrastructure and high-quality service.*
- 2. The benefits of infrastructure and associated networks which service the wider community, Auckland or New Zealand are recognised, including:
  - a. the essential services provided by infrastructure networks, which provide for the functioning of communities, businesses and industry*
  - b. enabling economic growth*
  - c. providing for public health and the well-being of people and communities*
  - d. contributing to a well functioning and liveable Auckland*
  - e. protecting the quality of the natural environment*
  - f. enabling interaction and communication.**
- 5. Infrastructure planning and development is integrated and co-ordinated with land use and development to support residential and business growth.*
- 6. Auckland's significant infrastructure is protected from reverse sensitivity effects and incompatible subdivision, use, and development.*

**Relevance** - These objectives address the requirements of Part 2 of the Act. It allows for the provision of infrastructure in a sustainable fashion, ensuring that the economic and social wellbeing of communities is provided for while also maintaining the natural environment. Furthermore, these objectives align with section 30 (1)(gb) though the strategic alignment of infrastructure with land use.

These four objectives underpin the infrastructure issues facing Auckland's urban growth. New urbanised areas, whether they be contiguous with Metropolitan Auckland or form part of rural and coastal settlements are reliant on infrastructure to function.

Infrastructure takes many different forms, ranging from bulk network services (e.g. wastewater collection and treatment) and transport (e.g. new roading and PT services) through to social infrastructure (e.g. schools, parks, and medical facilities).

In order to service these areas, it will be necessary to build new infrastructure and upgrade existing assets across Auckland. Poor recognition of this infrastructure investment would result in poorly functioning urban areas, with reductions in liveability, economic activity, and environmental indicators.

It is recognised that previous urban expansion has not always taken full account of infrastructure impacts, placing stress on infrastructure providers (including Council) to meet the expectations of these new communities. Improved co-ordination between infrastructure provision and land delivery is needed to achieve greater efficiencies in infrastructure investment and ensure that levels of service for existing and new communities is not compromised. Working with providers and improving alignment will be achieved in part by the Forward Land and Infrastructure Programme.

Furthermore, new urban development can occur in locations that were previously considered remote or away from sensitive land uses. Such locations were selected for a variety of

infrastructure types which require buffers and safety distances from them. In order to ensure the continued functioning of such facilities and assets (e.g. electricity transmission lines) it is necessary for new urban areas to be designed in a complementary fashion which avoids conflicts with these existing important land uses.

**Usefulness** - Giving adequate consideration to infrastructure planning and investment is a necessary step in determining the RUB and future urban areas. These objectives provide guidance to the decision making process by the inclusion of the full range of infrastructure issues.

**Achievability** - As part of the RUB study, the Council has engaged with the full range of infrastructure providers to determine how the RUB can work with existing infrastructure investment programmes, what infrastructure service shortfalls exist, and the likely investments needed to serve new urban areas. This work carries on from earlier consultation and investigations undertaken as part of the Auckland Plan.

This process will then feed into both the asset management plans of infrastructure plans, as well as the Council's own Long Term Plan.

**Reasonableness** - It is reasonable to impose such objectives given the significant costs associated with infrastructure provision in new urban areas. Furthermore, these new areas will also rely on existing infrastructure assets and networks. Inadequate assessment of these costs would undermine the financial viability of the Council and other infrastructure programmes, as well as potential impacts on both housing affordability and the ability of the development sector to deliver new residential and business sites.

**Council Powers** - It is considered that the objectives and policies under the RPS Objectives 3.2 (1), 3.2 (2), 3.2(5) and 3.2(6) will assist the Council in achieving the integrated management of natural and physical resources (s30(1)(a) of the RMA) and managing environmental effects that are of regional importance (s31(1)(b) of the RMA).

They are also consistent with the Council's territorial functions of integrated management under s31 of the RMA, particularly s31(1)(a). The provisions are also consistent with s59 as they assist in providing an overview of region-wide issues and with section 61 given their consistency with the Auckland Plan.

## **2.5.1 Policies**

### Policies - 2.3.2 Infrastructure and energy

*3. Integrate infrastructure with land use development by ensuring it is:*

- a. planned and funded at an early stage with land use provisions to provide for growth*
- b. provided to service land use development within the RUB*
- c. located in a way that does not fragment or limit planned land development within the RUB.*
- d. timed to avoid the inefficiencies and costs associated with servicing unplanned development or development that has occurred out of sequence.*

*5. Provide for the locational requirements of infrastructure by recognising that it often has a functional need to be located in certain places.*

*7. Avoid reverse sensitivity effects by requiring subdivision, land use and development to not occur in a location or form that constrains the use, operation, maintenance and upgrading of existing and planned significant infrastructure.*

It is considered that these policies adequately support the development of the RUB, given the further elaboration of those infrastructure issues highlighted in Part 2.2 of the Plan, by

ensuring that new urban areas are selected and located in conjunction with the infrastructure issues facing Auckland.

These policies also protect the RUB by ensuring that new infrastructure investment will not undermine the future urban areas identified in the RUB by the placement of inappropriate activities (e.g. thermal power stations) within proposed urban environments. The policies illustrate the balance needed to ensure that adequate infrastructure investment occurs to support Auckland while also avoiding infrastructure/land use conflicts which have occurred with previous expansions of Auckland.

The policies (specifically policy 3) also allow for a broad range of inefficiencies to be discussed as part of the land development and selection process. While traditionally such inefficiencies may be viewed from an engineering perspective, the need to allow decision making within an RMA process to consider the financial implications of infrastructure investment will be of significant value to the RUB.

### **2.5.2 Rules**

Given the RUB sits at a Regional Policy Statement level, there are no rules that are directly affected by the above stated objectives and policies.

### **2.5.3 Costs and Benefits of Proposed Policies and Rules**

The use of these policies supports the delivery of the RUB, while also ensuring that the future urbanisation of proposed greenfield areas will not compromise existing infrastructure assets such as the national grid.

Previous greenfield development and urban expansion has at times been undertaken without due regard to the infrastructure implications. Examples of such development include the numerous areas of underbuild present along the national grid routes through Auckland. These land-use/infrastructure conflicts present an economic cost to Auckland as they impact on the ability for infrastructure providers to operate and manage the network.

Furthermore, the improved integration between land use and infrastructure planning will improve infrastructure delivery efficiency. This will reduce delays in the uptake of infrastructure capacity.

### **2.5.4 Adequacy of Information and Risk of Not Acting**

It is considered that there sufficient information on which to base the proposed policies and methods.

## **2.6 Objectives**

### **Objective - 3.3 Transport**

*1. An effective, efficient, and safe transport system that is integrated with and support, a quality compact form of urban growth and associated land use.*

**Relevance** - These objectives address the requirements of Part 2 of the Act. It allows for the provision of infrastructure in a sustainable fashion, ensuring that the economic and social wellbeing of communities is provided for while also maintaining the natural environment. Furthermore, this objective aligns with section 30 (1)(gb) through the strategic alignment of infrastructure with land use.

Access to an efficient, integrated transport system is critical to enable people and communities to provide for their social and economic needs, including access to education, employment, retail, leisure and social infrastructure. In order to support the quality, compact

form of growth promoted by the Unitary Plan and limit urban sprawl, land use and transport systems need to be planned concurrently so that new communities can access a range of transport options. An effective and efficient transport system includes a range of modes, including public transport and opportunities for journeys to be made by walking and cycling. Integrating transport infrastructure with land use and supporting higher density development around key transport nodes and centres is an essential component of this objective.

**Usefulness** - This objective will enable the planning of an efficient and integrated transport system that is safe, well-connected and provides a mode choice to allow people to act sustainably. It will also contribute to a strong economy by enabling the efficient movement and distribution of goods and services to businesses and individuals, as well as people movement.

**Achievability** - The objective can be effectively met by the integration of transport planning and funding decisions with the RUB study and future land use decision making. Transport infrastructure/land use integration is a key feature for successfully managing Auckland's future expansion and a number of processes (e.g. the Long Term Plan, the Regional Land Transport Strategy) give the opportunity to ensure this integration occurs.

**Reasonableness** - Ensuring the integration of future land use and transport systems allows for opportunities to enable and improve transport choice. This can lead to benefits including improved health and well-being and reduced travel costs for individuals. This is proportionate and necessary in terms of areas of new urban growth.

**Council Powers** - It is considered that the objectives and policies under the RPS Objective 3.3(1) will assist the Council in achieving the integrated management of natural and physical resources (s30(1)(a) of the RMA) and managing environmental effects that are of regional importance (s31(1)(b) of the RMA).

They are also consistent with the Council's territorial functions of integrated management under s31 of the RMA, particularly s31(1)(a). The provisions are also consistent with s59 as they assist in providing an overview of region-wide issues and with section 61 given their consistency with the Auckland Plan.

## **2.6.1 Policies**

### Policies - 2.3.3 Transport

*7. Manage the increase in travel associated with development which is in accordance with the quality compact form of growth provided for in this plan while recognising that travel times may increase as development occurs.*

*13. Support land use which reduces the rate of growth in demand for car-based trips, especially during peak periods.*

These policies directly link the influence of land use decisions with the operation and development of transport networks. These support the RUB given the importance in the RUB's development to transport infrastructure (both existing and proposed) and will also assist in future land delivery processes.

## **2.6.2 Rules**

Given the RUB sits at a Regional Policy Statement level, there are no rules that are directly affected by the above stated objectives and policies.

### 2.6.3 Costs and Benefits of Proposed Policies and Rules

These policies highlight the importance of providing an urban form which minimises the need for costly transport infrastructure investment and maximises the use of any such investment. By integrating land use decision making with transport planning, opportunities will arise for reducing costs associated with both infrastructure investment and travel delays.

### 2.6.4 Adequacy of Information and Risk of Not Acting

It is considered that there sufficient information on which to base the proposed policies and methods.

## 3 Alternatives

This section provides an evaluation of the pro-active development capacity and land supply approach set out in the Unitary Plan against two other alternatives. The alternatives considered are:

- a. Status quo – retaining the current RPS policies and approach, using a statutory urban boundary –the MUL able to be amended by way of plan change.
- b. Preferred Alternative - Quality compact Auckland approach, using a defensible long term statutory urban boundary - the RUB, with targets for dwellings inside and outside the metropolitan urban area 2010 and orderly, timely and planned development within the RUB consistent with Auckland’s Development Strategy (Section D: Auckland Plan 2012).
- c. Laissez-faire, expansive alternative with no growth management tool, relying on plan changes to accommodate growth in whatever form it may present itself.

The background evidence for these three alternatives is found in the Draft Auckland Plan Scenario Evaluation Technical Report (Final September 2011) which built on the Future Land Use and Transport Planning Project – Evaluation of Future Land Use and Transport Scenarios (Final April 2010). The evidence base provided in these reports provides a multi-criteria analysis and assessment across different approaches relating to Auckland’s future spatial form.

The following scenarios reflect a ‘best fit’ to the policy approaches highlighted in this report.

Policy Alternative	Future Land Use & Transport Planning Project (2010)	(Draft) Auckland Plan Scenario Evaluation (2011)
A - Status Quo	Scenario 4 - Current Policy	Scenario A - Intensive Containment
B - Preferred Alternative	Scenario 1 - Compact	Scenario B - Intensive Expansion
C - Laissez faire, expansive alternative	Scenario 5 - Expansive	Scenario C & D - Dispersed Containment & Dispersed Expansion

The evaluation of future land use and transport scenarios (April 2010) indicated that overall a compact urban form performed better across most criteria (including less impact on the environment, improved regional productivity by enabling businesses to have better access to skilled labour and transport infrastructure, provision of a strong network of centres to facilitate greater social cohesion and access to social facilities).

However, it was noted in the analysis that there needed to be flexibility in the future urban form in particular to accommodate new greenfield areas for Group 1 business activities. Land use and transport integration together with comprehensive planning and implementation of infrastructure, and supporting national and local policy interventions were highlighted as important additional factors to achieve the desired outcomes.

The technical Scenario Evaluation report (September 2011) reinforced these findings with a more fine-grained analysis. This evaluation reinforced that a compact urban form performed better across multi-criteria analysis. However, flexibility is needed to cater for future growth challenges and achieve an optimal balance and desired outcomes. Detail is provided in the report across a number of inter-related themes:

- economic development,
- transport
- infrastructure
- market feasibility
- housing affordability and choice
- climate change
- natural hazards
- environmental quality
- heritage and cultural values
- Māori
- rural.

The report confirmed the approach of the earlier technical report that planning for Auckland's future spatial form would not be sufficient by itself to deliver the outcomes sought, and that other mechanisms were needed including:

- a strong focus on implementation, partnerships with central government and iwi, and additional implementation tools
- comprehensive investment in infrastructure
- appropriate funding for infrastructure and new development
- central and local government policy interventions

The table below discusses each alternative compared with the Preferred Alternative.

	<b>Alternative 1 - Status quo policy - Containment of growth within Metropolitan Urban Limits (MUL)</b>	<b>Alternative 2 - Preferred Alternative - Quality compact Auckland with up to 70% of growth inside the Auckland Metropolitan Area 2010 and staged, managed growth within the Rural Urban Boundary (RUB)</b>	<b>Alternative 3 - Laissez-faire, ad hoc alternative with no growth management tool</b>
<b>Appropriateness</b>	<p>The MUL (or similar approach) has been used as a policy tool for Auckland for many years, supporting various approaches to growth and the effects of growth. When the Auckland Plan was adopted in 2012, it set out a departure from previous approaches to growth, with a clear mandate for a transition to a quality compact Auckland. The Auckland Plan, together with the Auckland Housing Accord, provides a focus on accelerating housing delivery over both short-term (3-year) and long-term (30-year) time horizons.</p> <p>The shift from the MUL option recognises that it is no longer the most appropriate tool to advance Auckland's long term growth objectives. As a tool it has focussed more on the medium-term time horizon. It is difficult to address and balance in a strategic way multiple objectives using a containment policy tool such as the MUL. In terms of encouraging greater intensification in both existing and new urban areas, the MUL did not allow for the long-range consideration of key issues affecting the scale of growth anticipated by the Auckland Plan.</p> <p>It is considered that the continued use of the MUL is not the most appropriate approach to meet the objectives.</p>	<p>The use of a long term, defensible growth boundary (RUB) with associated targets and a land release and infrastructure programme, offers a more appropriate growth management tool for Auckland. This is especially the case given the projected demands and context for new development capacity and land supply in Auckland over the next 30 years to accommodate both residential and business demand.</p> <p>The use of the RUB allows for greater certainty for the development sector and wider community, while also allowing for greater infrastructure alignment and environmental protection. This option offers a more enabling, proactive and integrated approach. It will support urban growth in both the existing metropolitan urban areas and greenfield areas in a more effective and efficient way. This provides a balanced approach increasing supply and matching this increase in supply with appropriate servicing.</p> <p>As such, it is considered that the RUB meets the requirements of Part 2 of the Act, given its ability to allow for the development of Auckland in a timely way. The RUB allows the council and its partners to effectively plan for major infrastructure and transport networks, enabling economic growth and opportunity across Auckland, as well as protecting the environment. It also provides the community and development industry with greater certainty. The provisions outlined in the preferred alternative are able to provide an integrated approach that achieves multiple outcomes across the housing, infrastructure, environment and community themes that will benefit Auckland as a whole.</p>	<p>Given the challenges facing Auckland to accommodate its future growth, it is considered that a policy option that allows individual development initiatives - plan changes and consent applications - to be considered on an ad hoc, unmanaged way, without wider consideration of critical factors such as infrastructure provision and servicing, and affordability is not an appropriate option for a complex, rapidly-growing city. Auckland requires a more pro-active and balanced approach to ensure opportunities are leveraged to maximum benefit. A laissez-faire approach as captured in this alternative would fail to maximise the economic advantages of being more proactive around supply and capacity.</p>
<b>Effectiveness</b>	<p>The largely reactive approach of the MUL failed to facilitate the timely achievement of land supply and development capacity to meet current and future demand. Overall it provides a more incremental and less certain approach which is not considered to be sufficient to address the housing crisis Auckland currently faces.</p> <p>With a new and more challenging growth agenda, the role of the MUL has been reviewed. Limitations and criticisms of the MUL have included its lack of focus on the development of centres, or the creation of communities (Greg Hill, 2008: The Effectiveness of the Auckland Metropolitan Urban Limit - Ring-fencing Urban Development, p.11), and the recognition that the MUL offered only limited scope for comprehensive planning of new growth areas and effective consideration of wider scale environmental impacts, beyond the land subject to the MUL shift.</p> <p>The effectiveness of the MUL may be inadequate given its limitations in terms of meeting the requirements of the Local Government (Auckland Council) Act 2009. Section 79 requires the Council to prepare and adopt a spatial plan comprised of a comprehensive and effective long term (20- to 30-year) strategy for Auckland's growth and development. The MUL in its current form, does not provide for such a long term view of growth, and does not meet this requirement.</p>	<p>It is accepted that Auckland's urban expansion needs to be undertaken in a managed way in order to minimise the adverse effects of this expansion.</p> <p>This option provides a pro-active approach which is able to provide long-term certainty to communities, land owners/developers and infrastructure providers. It is able to achieve the targets and objectives for increasing supply and development capacity by better aligning land development and infrastructure delivery. This approach is supported by a new tool, the Rural Urban Boundary (RUB).</p> <p>The RUB provides a greater degree of certainty regarding Auckland's expansion than the current MUL. It clearly identifies future urban areas while limiting the loss of more productive rural areas.</p> <p>While it lacks some of the flexibility of the MUL, it does provide greater opportunities for the alignment of land release and infrastructure planning, ensuring that delays and costs to land delivery are reduced. The RUB allows for considerable flexibility about what happens inside the RUB over the long term, including the work on sub-regional analysis, the Forward Land and Infrastructure Programme, and detailed structure planning.</p> <p>The RUB also allows for greater environmental protection by reflecting the larger scale and scope that is needed for the management of the natural environment. This in turn both allows for the improved planning of open space (as part of environmental protection) while also giving the opportunity to reduce costs in environmental effects mitigation (e.g. stormwater management across entire catchments). The RUB also allows for longer lead times in which to understand and mitigate effects.</p> <p>While future risks exist with ensuring land supply, the scale of the greenfield land identified will give a greater confidence to the development sector and</p>	<p>This option is largely ad hoc and incremental and provides no guarantee of increasing supply and development capacity as it does not provide sufficient linkage with infrastructure and servicing decisions. It also does not support the linking of housing areas with access to employment or affordable transport. It is not considered an adequate response to Auckland's housing crisis as there is no planned approach to achieve the objectives and targets set out in the Auckland Plan, the Auckland Housing Accord and the Unitary Plan. It would also fail to achieve a planned approach to development outside the existing urban area which could create significant adverse effects, including under-utilised infrastructure or lack of demand. For example, this approach could result in assets left under-utilised despite high levels of investment by providers. Further, there may be technical difficulties in having to respond to ad hoc requests (for example requiring additional pumping due to low flow issues) and it may be challenging to achieve an appropriate scale for the infrastructure response.</p>

		<p>the wider economy than currently provided by the MUL process. This will allow council to manage both greenfield and brownfield development capacity to meet the 70/30 aspiration set out in the Auckland Plan.</p> <p>This improved alignment with the Auckland Plan also provides better linkages with the goals of section 79 of the Local Government (Auckland Council) Act and its 30 year planning horizon for Auckland. Furthermore, this linkage to local government processes strengthens decision making made under both the Local Government Act and RMA.</p> <p>Finally, the use of the RUB gives security to rural communities and community organisations as to the location of Auckland's future growth. The lead time provided allows for them to prepare for increased populations and demands on their service/social functions.</p>	
<b>Efficiency</b>	<p>The MUL option without a pro-active, forward looking approach to land delivery and infrastructure has been shown to be an inefficient growth management tool. In some cases it has seen poor alignment between the land zoning process and the efficient provision of infrastructure as incremental development proposals arise and are dealt with through the RMA process, with no linkage made to infrastructure servicing or funding agreements. This may then lead to a lack of implementation, exacerbating current supply constraints.</p> <p>While the MUL initially provided some guidance regarding urban growth management, it is now considered to be inappropriate, given its inefficiencies and associated costs, in addressing the growth challenges facing Auckland. In addition, there is little alignment between the MUL and the council's long term planning instruments.</p>	<p>The RUB option, accompanied by a Forward Land and Infrastructure Programme (FLIP) focused on achieving targets, is considered to be an efficient growth management tool. Its ability to allow for greater alignment between land supply and infrastructure provision, both inside and outside of existing urban areas, will lead to greater efficiencies. It will provide greater certainty for infrastructure providers and the development community regarding the timing and location of development, improving each party's ability to plan ahead. The package outlined in the Unitary Plan provisions (2.3) and supported by the council's Forward Land and Infrastructure Programme will be able to be implemented more efficiently compared with the other alternatives.</p> <p>The RUB also provides the council with the ability to manage the overall distribution of both brownfield and greenfield growth in a more balanced way. This will ensure it is consistent with the aspirations set out by the Auckland Plan of a quality compact city and a 70/30 split between intensification and greenfield growth.</p>	<p>While this option may be effective in seeing land delivered over time, there is the potential for ad hoc delivery with no certainty as to location and timing. This may make it difficult for infrastructure providers to plan ahead of development, and would be an inefficient use of existing infrastructure networks. This option has the potential to create long-term adverse effects that could be a burden on the community as a whole.</p>
<b>Costs</b>	<p>There are a number of possible costs associated with the containment approach and use of a MUL. These costs are largely a result of the piecemeal nature of the MUL (and adjustments to it) as compared with the use of the RUB as a tool with a longer term view. These costs are further discussed below:</p> <p><b>Environmental costs</b> In principle, this option appears to offer strong opportunities to minimise environmental costs with strict limitations on urban expansion as outlined under a containment approach.</p> <p>If the MUL were to remain, with the ability to request changes (a process would need to be in place), it is likely that increased pressure for urban development beyond the MUL would arise with requests for adjustments to the MUL. Since 1999 there have been 14 shifts approved to the MUL, approximately one per year, extending the urban area by approximately 2,650 ha in total. This piecemeal approach to changes to the MUL, compared with the longer term planning horizon of the RUB, may not properly allow for a wider or full consideration of potential environmental impacts during a MUL shift, in particular in terms of catchment management, or addressing potential cumulative impacts on a receiving environment from successive requests to change the MUL. There could be considerable costs and inefficiencies involved in respect of successive requests for changes to the MUL.</p>	<p>There are a number of possible costs associated with the use of a RUB. These costs are largely a result of the long term nature of the RUB as compared to the use of the MUL. These costs are further discussed below:</p> <p><b>Environmental costs</b> The longer term boundary presented by the RUB limits the ability for future development to react to changing paradigms in the built form, such as increased sustainability requirements. Future built form may present different land requirements than those assumed under the current identification of the RUB. This may lock development into patterns and forms which may be unacceptable under future requirements.</p> <p>In addition, increased demand or uptake of land within the RUB may result in limits to land supply. This may result in development of environmentally sensitive land within the RUB in order to supplement land supply.</p> <p>The structure plan process (outlined in Appendix 1 Unitary Plan) provides a robust process for the consideration of environmental costs and benefits.</p> <p><b>Economic costs</b> The RUB represents a longer term of development capacity than the MUL, in that while the MUL can be modified according to growth demands, the RUB is a 30 year limit.</p> <p>This lack of flexibility could result in the provision of insufficient land for development, should development and population growth not follow</p>	<p>There are a number of possible costs associated with a laissez-faire approach to managing urban growth. These costs focus mainly on the lack of focus, or direction of this option. These costs are further discussed below:</p> <p><b>Environmental costs</b> A lack of direction on the provision and location for the future supply of land to support Auckland's long-term growth may result in significant adverse environmental effects and associated costs as successive developments progress on an ad hoc basis. The inability to consider developments on a comprehensive basis is likely to lead to unintended adverse cumulative environmental impacts.</p> <p>This option may not achieve the purposes of the RMA.</p> <p><b>Economic costs</b> Unrestricted urban growth in the absence of any form of growth boundary could have significant economic impacts with infrastructure providers having to respond to potentially disparate or isolated developments on an ad hoc basis.</p> <p>Infrastructure providers may be unable to meet competing demands in numerous areas simultaneously or to optimise infrastructure provision by supplying services to numerous developments in reasonably limited areas in a staged manner. Existing infrastructure may become under-utilised and there is a possibility of new investments becoming stranded.</p>

<p><b>Economic costs</b> The main economic costs associated with the MUL and containment approach arise from the lack of flexibility and choice and the restriction of land supply and development capacity.</p> <p>Analysis by Zheng (2013) suggests that the containment of the Auckland region via a MUL has contributed to upward pressure on residential land prices within the urban areas (Zheng, 2013). This is most apparent at the lower end of the housing market, where lower priced land is often located, on the fringes of cities. This study indicated that an artificial ‘fence’ in the form of the MUL separating residential from rural land, there can be a significant limit to the supply of lower priced land, thus resulting in higher prices at the lower end of the housing market. This clearly is a potential issue both as an economic and social impact on housing supply and affordability. There are many factors that contribute to housing affordability in Auckland; these are discussed in detail in the New Zealand Productivity Commission’s report on the Housing Affordability Inquiry<sup>15</sup>. The Council is not currently meeting its land supply obligations and this would be very hard to do should the MUL approach remain.</p> <p>It should be noted that land at the urban edge is subject to a range of externalities and influences in terms land value and availability, meaning not all land is equal in terms of ability or affordability to service, or bring to market.</p> <p>When assessed against the RUB alternative, the more flexible approach taken by the MUL could contribute to cumulative increases to land prices and housing costs at the urban fringes.</p> <p>The costs associated with land banking rural land at the urban edge are the restriction of land available for development, which in turn can drive up land values, in the hope of urban development. Such land banking can prevent a logical progression of land release, and often market driven.</p> <p>Rural land outside of the MUL can face underinvestment, due to the uncertainty of whether it will be successful in achieving a MUL shift, and the consequent payback periods on productive investment such as greenhouses. This uncertainty and underinvestment in rural production and activities has adverse flow-on costs to the wider economy. However, a RUB identifies the 30 year growth boundary for Auckland and delivers a greater degree of certainty to rural land owners on whether their land will be urbanised.</p> <p><b>Social costs</b> In addition to land supply and housing affordability discussed above, the retention of the MUL as a policy tool, may lead to continued uncertainty for communities in terms of understanding where and when longer-term growth will happen and understanding the implications of this, in relation to local communities and places.</p> <p>Additional costs and delays to physical and social infrastructure planning and delivery may result from a lack of long term understanding of where and when urban growth is planned if</p>	<p>projected patterns in each RUB “cluster”. This could lead to rising land prices, reducing the availability of affordable housing, and leading to competing demand for land with other uses in the long term as individual RUB clusters may face greater development demand than projected.</p> <p>In addition, this lack of flexibility could result in constraints on business land availability, reducing Auckland’s economic competitiveness and negatively impacting on employment opportunities for residents over the long term.</p> <p>The large scale of land to be zoned future urban within the RUB will provide a significant immediate increase in the supply of greenfield land for urban development. It will be important to undertake regular monitoring around take-up to ensure effective response to demand and utilisation of infrastructure networks. The council’s sub-regional analysis such as that proposed through the Forward Land and Infrastructure Programme will help address this with the programme’s communication with infrastructure, iwi, developers, and land owners.</p> <p>The establishment of the RUB and signalling of rural areas for future urban growth may also limit investment in productive rural activities.</p> <p>The use of a RUB may also exclude land that otherwise may be useful, or attractive for development. Removing these potential development opportunities may negatively impact on ensuring adequate land supply, while also limiting economic opportunities for the development sector. There may be sound reasons for excluding land from the RUB on environmental or cultural grounds. The Forward Land and Infrastructure Programme will work with non-regulatory mechanisms to promote delivery in both existing urban and greenfield areas within the RUB.</p> <p>The RUB could also be less market responsive than the MUL. This could lead to the urban zoning of land which is unattractive for development from a market perspective. This in turn could place further limitations on housing and business land availability as land zoned is not taken up for development. This lack of uptake could also result in the stranding of infrastructure, with transport and other infrastructure assets left underused despite high levels of investment by providers.</p> <p>Furthermore, the constriction of land supply could place pressures on infrastructure services, as less serviceable locations are brought to market or intensification occurs in inappropriate locations. Both these outcomes would likely require expensive infrastructure solutions to ensure acceptable levels of service and meet social, environmental, and cultural requirements.</p> <p><b>Social costs</b> The possible constriction of land supply as a result of a longer-term RUB could lead to pressures for intensification in other areas of Auckland. In some instances, this intensification could occur in inappropriate locations, leading to pressure on social infrastructure and services.</p> <p><b>Cultural costs</b> The increased demand or uptake of land within the RUB may result in limits to land supply. This may result in pressure to develop culturally sensitive land within the RUB to increase supply.</p> <p>In addition, pressures for growth may limit the availability of land for papakainga and other developments of interest to iwi.</p>	<p>Equally, uncertain development uptake and underutilisation of costly infrastructure can have economic implications for service providers trying to recover costs through development contributions and growth charges.</p> <p>The presumption that all land at the periphery is equal in terms of the ability or affordability to service and to yield housing and business does not reflect true economic costs and ongoing servicing requirements.</p> <p><b>Social costs</b> The lack of strong planning direction for land supply under this option makes planning for key social infrastructure such as schools and health facilities more difficult and less predictable. This option may exacerbate housing affordability issues with houses being located away from essential infrastructure and transport links, thereby contributing to higher costs of living.</p> <p><b>Cultural costs</b> This option brings with it the risk of a loss of rural landscapes, very much a part of Auckland’s heritage and a risk of loss to culturally sensitive environments as land is taken up for urban use. There was overwhelming support for a quality compact Auckland direction through the Auckland Plan, and this option fails to provide a way to protect and enhance the cultural values of Aucklanders, many of whom support the Auckland becoming the world’s most liveable city with quality towns, neighbourhoods and villages that are supported by well connected infrastructure. The lack of forward or strategic planning under this option makes it difficult to take a comprehensive approach, placing heritage and other cultural values at risk from ad hoc development.</p>
---	--	--

	<p>the MUL is retained.</p> <p>The MUL has only had limited success (more recently) in contributing to creating centres based development and sustainable communities. This can be linked to the incremental and reactive nature of the MUL as a rather blunt tool for growth management.</p> <p><b>Cultural costs</b> In terms of containing growth and promoting intensification, the outcomes sought by an MUL/containment policy approach may be too inflexible and not able to respond adequately to community expectations in relation to the nature and type of development anticipated.</p> <p>In responding to requests for changes to the MUL, culturally sensitive land may be identified for urban growth without the benefit of ongoing engagement with Mana Whenua. This may lead to a lack of understanding of cultural values, such as those associated with reductions in water quality through stormwater, or the removal or disturbance of cultural heritage; as well as limited opportunities to consider development plans advanced by Mana Whenua.</p>		
<p><b>Benefits</b></p>	<p>The use of the MUL provides a number of benefits. These are listed below:</p> <p><b>Environmental benefits</b> The MUL option is essentially a protective measure intended to ensure that environmental values are safeguarded in the face of demands for land supply.</p> <p>Advantages of this include flexibility in terms of how and in what sequence land is released to accommodate urban growth. The MUL option would allow for potentially greater protection of elite rural soils and rural character. It could also incorporate changing environmental protection methods and techniques, and be more responsive to changing concepts and trends in built form and design.</p> <p>The current policies allowing for extensions to the MUL (Operative RPS Policy 2.6.2.2) clearly indicate that extensions to the MUL should avoid areas of high environmental value or environmentally sensitive areas, as well as areas of elite land. This strong policy position supports objective 2.6.1.3 in the Operative RPS to achieve a compact well designed more sustainable urban form.</p> <p><b>Economic benefits</b> The MUL is a reactive tool able to respond to a changing economic climate and conditions. In this way the MUL can be seen as being more market responsive to changing conditions (including housing, employment, lifestyle and immigration patterns), that are highly likely over a 30 year period.</p> <p>In relation to evidence that the MUL has resulted in upward pressure on residential land prices within the urban areas, (Zheng, 2013), this might also lead to a positive impact of land being used more intensively, and the council's intensification programme being delivered more quickly. Increasing land</p>	<p>The use of the RUB provides a number of benefits. These are listed below:</p> <p><b>Environmental benefits</b> This integrated approach takes a long-term comprehensive view to managing urban growth, with a defensible RUB, accompanied by a strong land release programme. This allows for the identification and management of urban growth effects well in advance of physical development activities, and the alignment of the various financial instruments that affect urban development.</p> <p>The long term approach of this option allows at the outset for the avoidance of sensitive or significant natural features and outstanding landscapes and the early introduction of comprehensive mitigation measures prior to urban encroachment and pressure to develop these areas.</p> <p>It is recognised that urban growth can have environmental effects, which can affect areas significantly larger than the urban development areas themselves (e.g. entire catchments or coastal eco-systems). An ad hoc or piecemeal approach to urban growth may not easily allow for the management of wider environmental effects. By limiting analysis to the direct effects of each urban expansion, the cumulative impacts of the wider long-term development of an area may be difficult to take into account.</p> <p>This wider approach is more synchronistic with the natural environment than the reductionist approach taken with smaller shifts in the MUL.</p> <p>The key environmental benefits of the option are:</p> <ul style="list-style-type: none"> <li>• The use of a well thought out forward land and infrastructure programme, avoiding an ad hoc or piecemeal approach to urban growth</li> <li>• Better advanced management of cumulative effects</li> <li>• More effective use of limited land resources preventing the encroachment of urban development on significant natural features and outstanding landscapes</li> <li>• Less development pressure on coastal towns and villages and sensitive receiving environments.</li> </ul>	<p>The use of a laissez-faire approach provides a number of benefits. These are listed below:</p> <p><b>Environmental benefits</b> Under such an ad hoc approach it may be difficult to appropriately manage or mitigate adverse effects of growth on sensitive environments in a proactive way. There are limited environmental benefits of this alternative.</p> <p><b>Economic benefits</b> The option creates opportunities for land development by developers with minimal regulation, with quicker delivery time. However it lacks integration with infrastructure so the ability to realise economic benefits is hampered. It may be difficult to create the conditions under this alternative for successful implementation and redevelopment. Increased supply of land to the housing market may lead to lower house prices and increase affordability.</p> <p><b>Social benefits</b> The option would provide for a less restrictive planning process, aiding delivery, which may increase supply. However without additional provisions and tools this approach is unlikely to address housing quality, therefore there may be minimal social benefits.</p> <p><b>Cultural benefits</b> Limited cultural benefits under this alternative.</p> <p>However, if resource management processes are correctly followed for all developments as they occur and appropriate safeguards are put in place, adverse effects of growth on cultural values should be able to be minimised.</p>

<p>values are a clear benefit to existing private land owners.</p> <p>The flexibility offered by the MUL can maximise opportunities for growth in locations where a large-scale use ends (e.g. quarry), and the MUL can more quickly respond to opportunities for urban growth.</p> <p>Bulk infrastructure can only be delivered where the market has indicated clear support for development in a particular location. This results in quicker recovery of costs through development contributions and growth charges.</p> <p><b>Social benefits</b> Restrictions of an urban boundary may encourage intensification within the MUL offering a wider choice of housing types. With the MUL able to shift in response to demand, pressure for intensification should be able to be accommodated either within existing urban areas, or within extensions to the MUL as requested. This should avoid intensification in inappropriate locations, and unplanned for infrastructure demand.</p> <p>Some of the social benefits of intensification include:</p> <ul style="list-style-type: none"> <li>• Regeneration of town centres and brownfield areas</li> <li>• A greater density and mix of activities providing for the full spectrum of people's needs for work, play, leisure and education</li> <li>• Support for a wider range of travel choices and greater passenger transport opportunities.</li> </ul> <p><b>Cultural benefits</b> As a flexible and responsive tool, the MUL has been able to address increases in demand for land for urban development, with each shift in the MUL considered in detail in terms of potential effects on culturally sensitive land.</p>	<p><b>Economic benefits</b> The option, particularly with the requirement for the staged orderly release of land, offers the opportunity for improved integration of infrastructure planning with land supply.</p> <p>In the past, infrastructure networks and services have not kept pace with the urban expansion of Auckland. Poor infrastructure alignment with land zoning though the RMA has led to delays in delivering growth capacity with subsequent negative economic impacts. The preferred alternative linked with the council's Forward Land and Infrastructure Programme provides a package of policy and implementation tools to ensure that physical and social infrastructure and services are aligned to the timing of development, and provide greater market certainty.</p> <p>A primary economic benefit of the RUB approach is the improved integration of infrastructure planning with land development. Infrastructure networks and services have struggled at times to keep pace with the urban expansion of Auckland. Poor alignment between these areas of planning has sometimes led to delays in delivering growth capacity with subsequent negative economic impacts.</p> <p>In addition, poor alignment between land development and infrastructure delivery can also lead to the wasting of infrastructure funding through the underutilisation of infrastructure (due to limited uptake in some areas). Given the limited budgets available for new infrastructure, new infrastructure builds must be maximised for uptake.</p> <p>The RUB also provides benefits to the continued functioning of the rural economy. Currently, rural land on the urban edge faces underinvestment. This is due to uncertainty of whether it will be absorbed into urban Auckland (given the piecemeal approach of the MUL) and the consequent payback periods on productive investment like greenhouses. This uncertainty and underinvestment in rural production and activities has adverse flow-on effects to the wider economy. However, a RUB identifies the 30 year growth boundary for Auckland and delivers a greater degree of certainty to rural operators on whether their land will be urbanised, and given greater availability of land for urban development, may limit the increase in land value.</p> <p>Furthermore, the provision of large areas of business land within the RUB future-proofs the economic growth of the region. By ensuring an adequate supply of business land, the RUB helps foster a business-friendly environment.</p> <p>Finally, the RUB provides a more unified and efficient approach to greenfield land release and delivery. It reduces the time from investigation to development by removing the MUL shift stage that currently exists in urban expansion without losing the appropriate assessment processes. Reduced time for land delivery also allows for reduced costs (e.g. reductions in land holding costs) and provides greater certainty to the market.</p> <p><b>Social benefits</b> The provision of a RUB gives scope to plan the future social needs of Auckland. The RUB helps identify future reserves and other recreational opportunities for Aucklanders.</p> <p>The aspiration for 70% of development to occur within the existing metropolitan area, while still allowing for some growth at the fringe out to a RUB should provide for a wider range of housing choices and opportunities</p>	
--	---	--

		<p>and may help to avoid limited land availability for housing and associated affordability issues.</p> <p>Land release in a staged, orderly manner enables better long-term planning of social infrastructure such as schools and health facilities. This gives adequate lead in times to plan and build such facilities while ensuring that existing facilities can also manage growing demand for their services.</p> <p>Furthermore, the use of a RUB allows for greater community confidence and cohesion. With the identification of the RUB and future greenfields, rural communities are given guidance to the growth which they can expect. This allows for communities to prepare for this growth and allow alignment with community organisations and NGOs.</p> <p>Like the MUL option, the intensification component ensures better use and optimisation of existing social infrastructure.</p> <p>Social benefits of intensification may include:</p> <ul style="list-style-type: none"> <li>• Regeneration of town centres and brownfield areas</li> <li>• A greater density and mix of activities providing for the full spectrum of people's needs for work, play, leisure and education</li> <li>• Support for a wider range of travel choices and greater passenger transport opportunities.</li> </ul> <p><b>Cultural benefits</b> Rapid urbanisation can often lead to the degradation of cultural values (e.g. reductions in water quality through stormwater) or the loss of heritage (e.g. removal of heritage buildings). The long-term vision of the RUB allows for the recognition of these issues and the development of a future urban form which works with these values in an holistic fashion. The RUB also allows for a longer lead time in which to plan mitigation measures.</p> <p>The structure plan process (outlined in Appendix 1 to the Unitary Plan) requires a cultural impact assessment; it also includes cultural landscape mapping which will reduce the risk to cultural values.</p> <p>Staged and orderly land release within the RUB allows for the advance identification, protection and enhancement of cultural values and sites in advance of changes to urban development. This approach helps to pro-actively manage and protect cultural values associated with waahi tapu, heritage sites and buildings and archaeological sites that are highly valued by Aucklanders. These features assist in giving Auckland its own character and definition to local places.</p>	
<p><b>Risks</b></p>	<p>The MUL option presents risks of unsatisfactory outcomes in land supply/delivery with land zoned and not adequately or efficiently serviced, slow take up of supplied land with associated delays in cost recovery by service providers.</p> <p>In general the processes followed in the MUL approach in the past have reduced the risk of poor environmental outcomes with various well tried checks and balances in place. If resource management processes are correctly followed and appropriate safeguards are put in place, the risk of adverse effects of growth on environmental values should be limited.</p> <p>Should use of the MUL continue (with little change to the tool itself and its application), there is a risk that urban growth would occur, but that it would be reactive and piecemeal, with a limited understanding of future housing and business land availability,</p>	<p>The RUB option with associated targets and a proactive land release programme offers greater opportunity to reduce risk for both developers and infrastructure providers by providing certainty about the timing and location of development with a 30-year outlook.</p> <p>Given the long term nature of the RUB, a key risk is that insufficient land will be identified for future growth over the longer term. This would result in a number of costs described previously.</p> <p>Like the MUL option, this option reduces the risk of poor environmental outcomes with structure planning and plan change processes required to move future urban land identified in the RUB to full urban use. This approach will be supported by council's Land Release and Development Capacity Strategy under the FLIP.</p> <p>The risk of land banking may arise, given the longer time frames of the</p>	<p>Similar to the MUL option, with no associated land release programme, the option presents risks of unsatisfactory outcomes in land supply/delivery with land zoned and not adequately or efficiently serviced, slow take up of supplied land with associated delays in cost recovery by service providers.</p> <p>There is a significant risk under this alternative that the targets for development capacity and land supply will not be achieved further exacerbating Auckland's housing crisis and reducing affordability.</p>

	<p>and potential negative impacts on employment growth and housing delivery, (i.e. urban growth areas in locations that do not contribute to a quality compact urban form).</p> <p>In addition, opportunities for comprehensive planning of growth areas, in terms of urban form, infrastructure and transport could be limited and inefficient.</p> <p>Should the MUL continue in its current form, there is a risk for the Council in failing to meet the requirements of s79 of the Local Government (Auckland Council) Act 2009 for a longer term (20- to 30- year) strategy for Auckland's growth and development. See above under effectiveness.</p> <p>There is a significant risk under this alternative that the targets for development capacity and land supply will not be achieved, further exacerbating Auckland's housing crisis and further reducing affordability and hindering the supply of employment land to support business growth.</p>	<p>RUB, and the future expectations of zone changes. This may be partly addressed by a larger amount of land available for development within the Future Urban zone and an increased level of competition.</p> <p>With the longer term nature of the RUB, a greater amount of land has been identified for future urban development. A related risk is that this land, previously under a rural zoning, may be removed from productive rural use once the RUB is confirmed, and be land banked over a longer term before live zoning takes effect.</p> <p>A further risk is that at some point in the future the land available for future urban uses within the RUB will be used up. Dependent on the stage in the plan review process, the political context at the time, and the degree to which the Auckland Plan's Development Strategy aspirations have been met, this can be managed through regular monitoring of land demand for urban uses.</p> <p>Opportunities to review the role and location of the RUB will exist when the Auckland Plan and the Unitary Plan enter a review process. Future generations will have the opportunity to reconsider the RUB and its location.</p> <p>The preferred alternative provides an opportunity to work cohesively and collectively towards achieving the targets for development capacity and land supply that will help assist in addressing Auckland's housing crisis.</p>	
--	--	--	--

## **4 Conclusion**

The development capacity and land supply approach proposed in the Unitary Plan (i.e. the Preferred Alternative outlined in the table above), combining targets for both intensification and greenfield areas of Auckland, a planned, staged and orderly land delivery and development capacity process, supported by a long-term, a defensible rural urban boundary (the Rural Urban Boundary), is considered to offer a more robust urban growth management process than other options. This approach is considered to be more pro-active, enabling and integrated when compared with retaining the current RPS provisions or taking a less regulated approach. The RUB provisions and targets, the land supply objectives and policies will provide greater certainty to Auckland's communities, infrastructure providers and the development sector about the timing and location of growth, while still ensuring all environmental safeguards are in place.

The RUB aims to ensure a quality compact urban form which makes best use of existing and proposed infrastructure, while also making efficient use of physical and natural resources, and limiting adverse environmental effects. As such, the RUB is consistent with those matters considered by section 7 of the Act.

The RUB allows for a comprehensive approach to environmental management, with the ability to take a wider view of environmental issues (including cultural and heritage values) than the MUL. This is consistent with those matters considered by sections 6, 7 and 8 of the Act.

The use of the RUB also provides for greater economic certainty. Existing landowners and communities will have better information to make decisions about their businesses, rural activities, and community organisations. The development community, business sector, and infrastructure providers will also be left with greater confidence with regard to land supply, the pattern of Auckland's development, and the financial implications of providing for growth. Given this, the RUB is considered to meet the purpose of the Act as stated in section 5.

These provisions in the Unitary Plan take an integrated approach to resource management, in order to efficiently and effectively address the challenges and complexities of growth and development in Auckland over the next 30 years.

As New Zealand's largest city, it is essential that the opportunities and challenges high rates of growth bring are managed effectively in a way that maximises beneficial outcomes for all Aucklanders, and protecting those aspects Aucklanders value the most. The Unitary Plan provisions outlined in RPS 2.3 - Development Capacity and Supply of Land for Urban Development and other related provisions set out an enabling approach that will help to address the housing and business land challenges Auckland is facing, increase land supply and development capacity, provide a more flexible and balanced response whilst protecting and enhancing important environmental and cultural values.

## **5 Record of Development of Provisions**

### **5.1 Information and Analysis**

The approach in the Unitary Plan is based on numerous technical analyses and reports undertaken or commissioned by the council:

- Technical Report - Policy Options for Delivering a Quality Compact City, September 2011 (Appendix 3.1.1)
- Technical Report - Towards a Preferred Urban Form, September 2011 (Appendix 3.1.2)

- Australian Housing and Urban Research Institute - Planning reform, land release and the supply of housing, February 2010 (Appendix 3.1.3)
- Ministry for the Environment - Report of the Minister for the Environment's Urban Technical Advisory Group, July 2010 (Appendix 3.1.4)
- Technical Report - Scenario Evaluation Workstream (and attachments), September 2011 (Appendix 3.1.5)
- High-level overview of submissions on Draft Auckland Plan, January 2012 (Appendix 3.1.6)
- Total Auckland Development Potential *by Studio D4 and Jasmax*
- Commentaries provided by experts in the urban development industry.

It also responds to a range of data and research results such as:

- Auckland population growth projections (High growth scenario)
- Capacity for Growth (*ARC 1996, 2001 & 2006, Auckland Council 2012*)
- Future Land Use and Transport Planning Project - April 2010
- Housing demand and supply - Auckland Region Housing Market Assessment (Appendix 3.1.17)
- Housing type and location in Auckland
- Household crowding data
- Land use zoning, i.e. Residential and Business, *GIS database*
- Existing housing stock and housing type data base (*ARC building consent database*).

References include:

- New Zealand Productivity Commission - Housing Affordability Inquiry, March 2012 (Appendix 3.1.7)
- Greg Hill - The Effectiveness of the Auckland Metropolitan Urban Limit - Ring-fencing Urban Development, June 2008 (Appendix 3.1.8)
- Guanyu Zheng - The effect of Auckland's Metropolitan Urban Limit on land prices, March 2013 (Appendix 3.1.9)

The land supply provisions in the UP will be supported by the council's Forward Land and Infrastructure Programme (FLIP) and associated Land Release & Development Capacity Strategy. Other council and joint initiatives will support the land supply objectives and policies including:

- The Auckland Housing Accord (May 2013) an Auckland Council/ Central Government accord
- Auckland Plan 2012
- Auckland Housing Action Plan 2012 (Appendix 3.1.12)
- Auckland Council's Forward Land & Infrastructure Programme (including Development Strategy Action Plan)
- The Auckland Infrastructure Providers' Forum (established in March 2013)
- Auckland Housing Project Office (established in August 2013)

### **The RUB Development Process**

The RUB was first developed as a component of the Auckland Plan's development strategy. The Auckland Plan was subject to a detailed research phase and a special consultative procedure. This research is contained within the Preferred Urban Form work prepared for the Auckland Plan. Initial identification of possible additional urban areas to be included within the RUB involved:

- A multi-layered analysis (including mapping) of constraints and opportunities (natural hazards, outstanding landscapes, transport networks etc.) that affect the location of new urban areas;
- Identification of legacy planning including plan changes and structure plans;
- Analysis of demographic information, including projected population growth for the life of the Auckland Plan;
- Cross-referencing of research with other Auckland Plan workstreams including Transport, Network Utilities, and Environment; and
- Use of transport modeling.

The development of the RUB also relied on public feedback to both “Auckland Unleashed” and the Draft Auckland Plan, through an online feedback management system.

Together, this work identified three broad greenfield areas of investigation with potential to provide new greenfield land for urban development, within the RUB:

- A Southern Cluster focused around Karaka, Drury, Paerata, and Pukekohe
- A North-Western Cluster focused around Kumeu-Huapai and Whenuapai
- A Northern Cluster focused around Silverdale, Orewa, and Warkworth.

Additional greenfield areas were identified at Maraetai-Beachlands, Kingseat, and Glenbrook that are subject to ongoing plan changes and structure planning.

Following the adoption of the Auckland Plan, a RUB project was initiated to define a recommended final RUB for the draft Unitary Plan. This project was split into four different stages, given the scale and complexity of the project, as well as the resources available to undertake the project. These four stages included:

- **Stage 1 - Updated 2010 MUL:** *Updating the 2010 MUL to include recent Environment Court decisions and consent orders.*
- **Stage 2 - The ‘Edge Work’:** *Revising the updated 2010 MUL, (Stage 1), around the existing metropolitan urban area based on public feedback to the draft Auckland Unitary Plan.*
- **Stage 3 - Greenfields Areas of Investigation:** *Determining a RUB in the ‘greenfield areas of investigation’ identified in the Auckland Plan. The greenfield areas include the two satellite towns of Warkworth and Pukekohe.*
- **Stage 4 - Other RUB Areas** *includes setting the RUB for rural and coastal towns and serviced villages outside the ‘greenfield areas of investigation’.*

The RUB project is currently at Stage 3, with work underway investigating the RUB around each of the three previously identified “clusters”. Stage 4 work will be undertaken at a later date, after notification of the Unitary Plan.

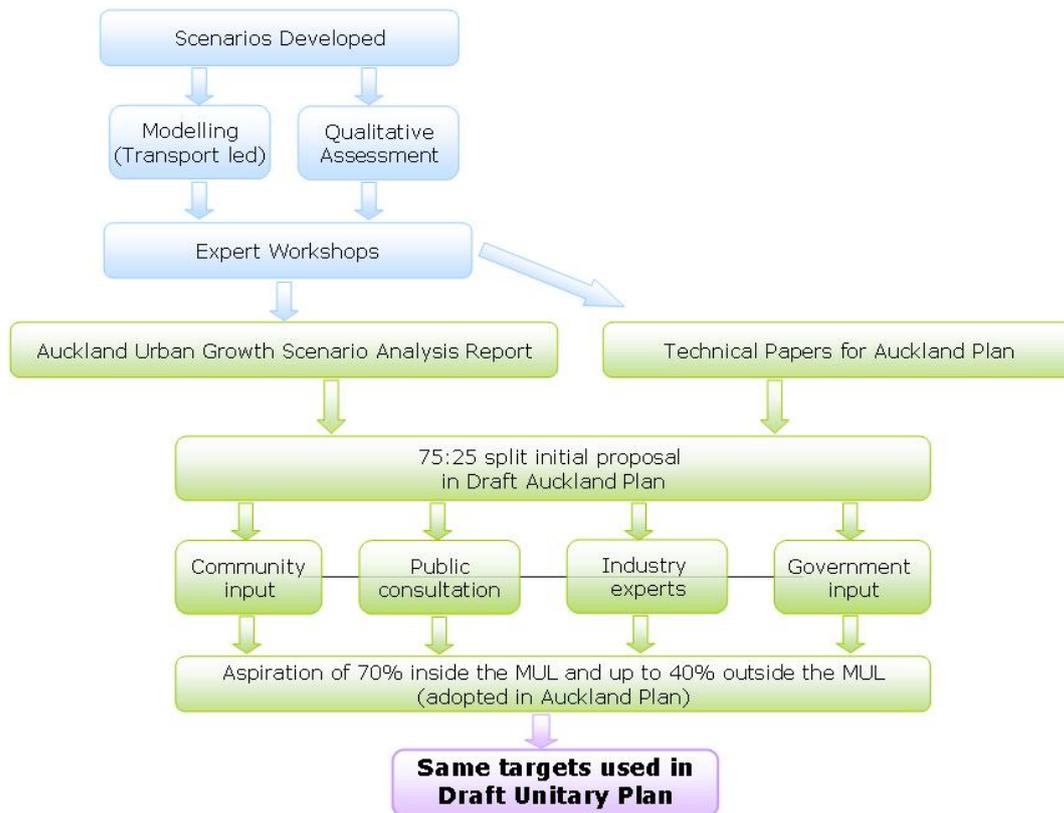
The RUB project has, at its core, a multi-criteria analysis approach, drawing on a broad range of information sources. Extensive community and iwi consultation has also been undertaken

to ensure that the finalised RUB takes full account of the range of planning issues identified in Part 2 of the RMA. Technical analysis to underpin the identification of a final recommended RUB includes:

- Catchment management
- Transport network information
- Geotechnical conditions
- Natural hazards
- Groundwater resources and water allocations
- Environmental constraints
- Economic development opportunities
- Business land demand
- Cultural considerations and tangata whenua aspirations
- Natural, cultural and built heritage
- Regionally significant landscapes
- Existing land use activities
- Soils
- Rural activities and rural production
- Legacy and current strategies and plan changes
- Preferred built forms

## **5.2 Consultation Undertaken**

The diagram below summarises the process for establishing the land supply targets outlined in the Auckland Plan's High-level Development Strategy (Section D: Auckland Plan):



The land supply provisions within the UP derive from the Auckland Plan process, which utilised an evidence-based approach together with extensive public consultation (including a special consultative procedure) to provide a strategy for Auckland’s growth and development over the next 30 years. Section 79 of the Local Government (Auckland Council) Amendment Act 2009 looks to the Auckland Plan is to “enable coherent and co-ordinated decision making by the Auckland Council and other parties to determine the future location and timing of critical infrastructure, services, and investment within Auckland in accordance with the strategy”. The Unitary Plan as a key tool for implementing the Auckland Plan provides the objectives and polices necessary for achieving land supply in a quality compact urban form.

The statutory requirements for consultation on the Unitary Plan are contained in Clauses 2 to 3C in Schedule 1 of the Resource Management Act 1991. During preparation of the Unitary Plan Council must consult with a number of Ministers of the Crown, iwi authorities of the Auckland region, customary marine title groups and affected local authorities. Schedule 1 does not limit who may be consulted during the development of the Unitary Plan. This section only identifies the key consultation undertaken in relation to the approach to greenfield development and land supply in the Unitary Plan. These provisions are contained in Section 2.3 of Chapter B. Section 1 of the wider Section 32 report contains further detail on the entire consultation and engagement process undertaken during the development of the Unitary Plan.

Iwi consultation on the Unitary Plan began with a governance hui, held in December 2011, which was followed by hui with individual iwi authorities in February 2012. Two topic based workshops that discussed growth and the RUB were held with iwi in March 2012. Iwi were able to articulate their aspirations for growth and identify the cultural issues associated with growth. A Mana Whenua Consultation Summary Report produced from these workshops was used to inform the development of the draft Unitary Plan. Key changes to the Unitary Plan as a result of this consultation was the requirement for a cultural impact assessment in

the structure plan guidelines and enabling papakainga in rural and coastal towns and villages in the Regional Policy Statement. This consultation summary report is included as an appendix in the wider section 32 report.

Iwi were provided with packages of draft Unitary Plan text and maps in September 2012. Topic based workshops were held in October 2012 to support iwi authorities in considering the working draft and provide feedback. The RUB and growth were one of the topics covered in these workshops. Feedback on these packages was reported to the Unitary Plan Political Working Party and was used to review and amend the draft Unitary Plan.

In March 2013 iwi authorities received copies of the draft Unitary Plan, responses to their feedback in late 2012 and an outline of key changes from the last draft they were provided. Several hui and workshops were held with these authorities to support consultation during this period. Greater detail on these and the other aspects of iwi engagement are outlined in section 1 of the wider section 32 report.

Consultation with the Department of Conservation and the Auckland Conservation Boards took place in late 2012 and early 2013. Consultation with adjoining Territorial and Regional Authorities also took place. Further details of this consultation are outlined in section 1 of the wider section 32 report.

Initial consultation with the Local Boards occurred in November 2011. Consultation on growth was carried out with the Upper Harbour LB and Hibiscus and Bays LB on 8<sup>th</sup> and 16<sup>th</sup> November 2011 respectively. Local Board views were gathered on the RUB, locations for greenfield growth and satellite centres. A Local Board symposium in March 2012 provided Local Boards the opportunity to amend and add to an outcomes matrix which was developed. The outcomes matrix was used to inform the development of objectives in the draft Unitary Plan. This is further discussed in the decision making section of this report. Local Board workshops were held in October and November 2012 to review the draft Unitary Plan maps and packages of text that had been developed, including the land supply provisions. Local Boards were again able to provide feedback and lead consultation events during the draft Unitary Plan informal engagement period.

Ongoing consultation has occurred with infrastructure providers during the development of the Unitary Plan and the revision of the March Draft, including with NZTA, Transpower NZ, Veolia Water, Watercare and Auckland Transport.

Consultation for the Rural Urban Boundary project was undertaken in the South, North-West and North of the region. Refer to the section of this report which covers the Rural Urban Boundary for specific details of this consultation. Much of this consultation overlaps with consultation for the Unitary Plan.

Sector and stakeholder workshops were held in early to mid 2012 and again in late 2012. Key workshops held in relation to new growth include the following;

- Developers workshops held on 27 February and 31 October 2012
- Takanini workshop on the 25<sup>th</sup> June 2012 – including developers, land owners, Auckland Transport, Watercare and Veolia Water.
- Property Council workshops on the 12<sup>th</sup> and 19<sup>th</sup> September 2012.
- Hobsonville Land Company (Housing NZ) workshop on the 25<sup>th</sup> September and 1<sup>st</sup> October 2012.

Extensive consultation across Auckland on the Unitary Plan occurred from March to May 2013. Over this period more than 250 engagement events were held, 22,700 individual pieces of feedback were received and 6000 pieces of feedback were generated by online

social media. More than 1800 comments were directed at the growth approach contained in the Unitary Plan. A housing simulator was released that enabled the public to allocate growth across the region and submit their results as feedback on the Unitary Plan. Amendments to the growth provisions of the Unitary Plan as a result of feedback received over this engagement period include:

- Clarifying the process for land release and out of sequence infrastructure provision
- Clarifying who can prepare a structure plan
- Addressing reverse sensitivity associated with significant infrastructure and growth

Further information on this consultation and engagement programme is outlined in section 1 of the larger section 32 report.

### **5.3 Decision-Making**

This section identifies the key political decisions in relation to the approach to greenfield development and land supply in the Unitary Plan. Section 1 of the wider section 32 report contains further detail on the political decision making process associated with the Unitary Plan as a whole.

An issues paper outlining the growth issues facing the region went before the Unitary Plan Political Working Party in September 2011 as part of the built environment issues paper. Issues and potential policy approaches were outlined and discussed. Using the issues paper and direction from the Political Working Party an options paper was developed, which contained costs and benefits of each policy approach. At this stage it was decided an outcomes matrix would be developed in place of options papers.

An outcomes matrix was developed to identify the outcomes the Unitary Plan should aim to achieve. Outcomes were identified in November and December 2011 and the Political Working Party, Local Boards and Council Controlled Organisations added and amended these outcomes. Tensions between outcomes were identified and then were worked through with the Political Working Party and direction setting papers were prepared. The outcomes matrix was used as the basis to inform the development of the objectives of the Unitary Plan that relate to greenfield development and land supply. The key zone in relation to the approach to land supply and greenfield growth is the Future Urban zone. Outcomes for the Future Urban zone that relate to land supply include:

- Development to only occur after a structure plan or precinct plan has been developed.
- Land release and development to occur as an extension of the existing urban area.

The Unitary Plan provisions were further refined through direction from the Unitary Plan Political Working Party (PWP). The approach to the implementing the RUB and an approach for proposals for new rural and coastal towns and villages was taken to the PWP in May 2012. The PWP endorsed establishing a 30 year RUB and a policy approach which identified criteria proposals for new settlements have to satisfy. The approach to urban development of greenfield land was taken to the PWP in July 2012. The PWP confirmed the proposed approach to defining the RUB and the mechanics of the Future Urban zone including use of plan changes and concurrent structure plans to release land for development. In September 2012 the approach to growth was again taken to the PWP. The PWP endorsed the principles of land release, the approach of the structure plan guidelines, the approach to integrating existing structure plans into the Unitary Plan and the criteria developed to assess proposals for new settlements.

## 6 Appendices

Appendix No.	Title	Author	Date
3.1.1	Technical Report - Policy Options for Delivering a Quality Compact City	Auckland Council	Sep-11
3.1.2	Technical Report - Towards a Preferred Urban Form	Hill Young Cooper	Sep-11
3.1.3	Planning reform, land release and the supply of housing	Australian Housing and Urban Research Institute	Feb-10
3.1.4	Report of the Minister for the Environment's Urban Technical Advisory Group	Ministry for the Environment	Jul-10
3.1.5	Technical Report - Scenario Evaluation Workstream (and attachments)	Auckland Council	Sep-11
3.1.6	High-level overview of submissions on Draft Auckland Plan	Naomi Craymer	Jan-12
3.1.7	Housing Affordability Report	New Zealand Productivity Commission	Mar-12
3.1.8	The Effectiveness of the Auckland Metropolitan Urban Limit - Ring-fencing Urban Development	Greg Hill	Jun-08
3.1.9	The effect of Auckland's Metropolitan Urban Limit on land prices	Guanyu Zheng	Mar-13
3.1.10	Auckland Unitary Plan - Rural Urban Boundary Discussion Paper - Transport	Joshua Arbury	Aug-13
3.1.11	Spatial Determinants of Land Prices: Does Auckland's Metropolitan Urban Limit Have an Effect?	Arthur Grimes and Yun Liang	Jul-08
3.1.12	Housing Action Plan Stage 1	Auckland Council	Dec-12
3.1.13	Capacity for Growth Study 2012 - Working Report	Auckland Council	Nov-12
3.1.14	Improving our resource management system. A discussion document	Ministry for the Environment	Feb-13
3.1.15	Performance benchmarking of Australian Business	Australian Government Productivity Commission	May-10

	Regulation: Planning, Zoning & Development Assessments		
<b>3.1.16</b>	Future Land Use and Transport Planning Project - Evaluation of Future Land Use and Transport Scenarios	Auckland Regional Council	Apr-10
<b>3.1.17</b>	Auckland Region Housing Market Assessment	Darroch Limited for the Centre for Housing Research Aotearoa New Zealand	Nov-10