

High-level overview of submissions on Draft Auckland Plan - Version 1.2

DRAFT - Long Version

Naomi Craymer, 24 January 2012

Public consultation on the Draft Auckland Plan was held from 20 September 2011 to 31 October 2011. There was an excellent level of engagement in the draft plan resulting in 1966 written submissions received as part of the formal special consultative procedure. This includes submissions from 1262 individuals (64%) and submissions from central government, iwi, community organisations, the business sector, educational institutes and professional associations. Over 850 submitters requested to be heard (44% of the total). Hearings took place from 1 November 2011 to 21 December 2011 and included three new innovative workshop forums, hui at Marae, Fale Pasifika venues, and provision for disabled people (e.g. sign language). A diversity of views were expressed on the draft plan through the public consultation process, with over 14300 submission points being coded and assessed.

This summary provides a high level overview of submissions received on the Draft Auckland Plan. It is based around the following sections:

- Development Strategy (encompassing Urban Auckland, Rural Auckland, Auckland's Housing, Auckland's Infrastructure and Auckland's Transport)
- Auckland's People
- Auckland's Maori
- Auckland's Arts, Culture, Heritage and Lifestyle
- Auckland's Economy
- Auckland's Environment
- Auckland's Response to Climate Change
- Implementation framework (encompassing All of Plan, Implementation Framework, Monitoring and Evaluation)

Overall submitters gave strong support to the direction and initiatives contained in the Draft Auckland Plan. Aucklanders have appreciated the opportunity presented by a single spatial plan for all of Auckland, to provide greater certainty for investment decisions and more effective interventions and implementation. Submitters have also strongly supported the place-based approach of the plan, which facilitates alignment and coordination of the activities and programmes of multiple agencies (e.g. Auckland Council, central government, business, community) in particular places.

An important issue across submissions was the need to be more explicit that the Auckland Plan is not simply a description of council activity, but rather is a plan for all Auckland and will require action, commitment and funding from many parties over the next 30 years. This will help address confusion regarding council's role in developing and implementing the plan, including concerns around mandate. Many submissions also highlighted the need for greater clarity around the council's planning framework, and the relationship/alignment between the Auckland Plan and the

Unitary Plan and Long Term Plan in particular. There was significant support from a large number of submitters for the transformational shifts contained in the Draft Auckland Plan.

Development Strategy

Overall, the majority of submissions were very positive about the direction of the high level Development Strategy, particularly supporting the quality compact Auckland approach. The following components received wide support:

- compact and intensive residential and business development around beautiful, well connected, well integrated neighbourhoods
- growth within the 8 priority areas
- placed based growth – development that reflects local context
- support for the Rural Urban Boundary to prevent urban sprawl
- efficient and affordable infrastructure provision
- reducing car dependency
- protection of rural and environmental values

Submitters support for a compact city was usually aligned with suggestions to make the urban area work better. Provision of green space and green networks, recreational and sporting facilities were often mentioned in order to minimise the effects of increasing urbanisation, contributing to an improved quality of life.

However, there was also significant unease expressed in submissions with the projected population growth identified in the plan and the impacts this would have on lifestyle and environment.

There were also a number of submitters opposing the quality compact approach for a variety of reasons including:

- the aspirations of the plan for a 75:25 intensification/greenfield split are unachievable
- Rural Urban Boundary will restrict the growth of Auckland
- loss of heritage and character
- does not reflect how the majority of Auckland's residents would like to live
- compact does not mean quality built stock and urban form. Implications for uniqueness, character and liveability of Auckland
- implications for land values and housing affordability
- lack of alternative solutions and evidence base for the compact city model

Some submitters felt that there was a need to consider alternatives to growth and justify the compact Auckland approach, for example looking at different models that could apply to the Auckland region. It was recommended that Council clearly state within the plan the economic and social benefits of the compact city structure over alternative structures.

The submissions suggested that as a first step to a quality compact city, urban redevelopment must be financially viable, and there needs to be planning rules that promote housing affordability and

easier construction of residential intensification (through the Unitary Plan). There was a need to avoid an over-reliance on up-zoning in the plan to achieve desired outcomes.

A large number of submitters were supportive of the concept of the Rural Urban Boundary (RUB) and saw it as an important step-change to address issues seen with the Metropolitan Urban Limit (MUL). These submitters considered that the RUB allows certainty for region's communities regarding land use planning, accompanying infrastructure provision and timing and the ability for councils to fund areas equitably – requiring developers to develop a vision that respects community interests and values. Submitters opposing the RUB saw it as too restrictive, unrealistic and hindering the growth of Auckland and increasing costs of business land. One of the main themes in these submissions was the impact of the RUB on housing supply and housing affordability. These submitters expressed concern that constraint on land supply caused by implementation of the RUB would drive land and house values up further exacerbating housing affordability issues.

Many submitters highlighted a lack of information in the plan regarding implementation of the RUB – defining its location and greenfield areas for investigation. A number of submitters were concerned over a perceived lack of rationale for the position of the RUB in the draft plan. Further detail was sought by submitters on the monitoring requirements relating to the RUB and capacities.

A number of submitters raised concerns regarding the feasibility of achieving the 75:25 intensification/greenfield split within the plan. A number of barriers were identified in the submissions ranging from small lot sizes, market/landowner desires through to community resistance and public investment requirements. Submitters requested that Council undertake further land supply analysis and some submitters recommended an alternative 60:40 or 50:50 split as being more achievable/realistic.

There was strong support for housing affordability being identified as a key issue in the plan, particularly given the link with housing to other social issues – including poverty, health, education and employment prospects.

Urban Auckland

In general submitters supported the identification of a hierarchy of urban and rural centres as a useful way of understanding future growth patterns. However, it was suggested that before areas are allowed to grow it is essential that infrastructure requirements are fully understood and there is a cost effective and technically feasible strategy in place to provide services that growing communities will need.

The centres based approach attracted overall support but there was some concern that the focus ignored market dynamics e.g. people are attracted to coastal locations – and that development should take place along coast. However this contrasted with other submissions (environment chapter) that gave support for intensifying areas already developed and preserving less developed coastal margins for the future. There was support for enhancing planning initiatives to support commercial centres of all scales (towns, suburban centres, villages) to encourage people to better utilise their own neighbourhood for work, life and play. Some submitters commented that there

were an adequate number of centres identified in the plan and that these centres should be allowed to flourish (some suggesting a moratorium on new centres so revitalisation of existing centres is possible).

There was strong support for the plan's place-based approach. Submitters gave unequivocal support for promoting high quality design – innovative and inspirational design. However some submitters considered the plan was lacking on the values and qualities of suburban development including consideration of Auckland as a collection of villages and communities.

Balancing heritage protection and intensification was identified through submissions as a major challenge for the Auckland Plan. Whilst the positive effects of the compact city approach on heritage areas outside the urban area (e.g. Maori and archaeological site protection) were recognised, there were potential risks to built heritage within the urban area.

The majority of those submitters who commented on the **City Centre** were supportive. There was a general sense that the planned investment in the city centre is required to create a vibrant sustainable Auckland which attracts tourists and investment to Auckland and New Zealand. There was generally strong support for increasing the ease with which people can access and move about the city centre, e.g. by improving public transport and improving the walkability of the city.

There were a number of place specific submissions relating to the categorisation of centres and maps. Further work on the classification was recommended to address inconsistencies. There was support for the eight prioritised areas, with some specific qualifications, and significant opposition to urban malls being included in categorisation. The proposed Sylvia Park was mentioned in particular, although St Lukes and Westgate attracted similar comments. A significant number of submissions (pro-forma) opposed further growth in Orewa, and in particular high rise development. There was also some opposition to intensive corridors, in particular Dominion Road given potential impacts on community character and heritage.

Rural Auckland

Overall, submitters supported the main themes of the rural chapter, its priorities and the main components of the strategy – keep rural areas rural, vibrant and productive with future population growth focused in existing towns and villages. The directives seeking to protect rural production systems, develop a flexible regulatory framework, growing rural settlements in a structured way were strongly supported. However, concerns identified in the submissions included:

- Need to support rural communities and avoid overly urban focus in the plan
- Importance of ready access to rural and natural coastal environments from urban areas for making Auckland more liveable than other cities
- Need to make things easier for users of land, water and aggregate rural resources and for other rural enterprises – including controlling reverse sensitivity
- Greenfield areas for investigation – and the amount of land included
- Improve rural outcomes making rural land uses environmentally sustainable reducing impacts on water quality

- Importance of retaining future opportunities for food production and protecting rural environment
- Too many constraints for country living and non-urban settlement opportunities
- Implications of protecting important rural gateways
- Greater attention to rural roading and wastewater services

There was some concern over 'simplistic' split between urban and rural as two separate discussions – nothing contemplated in between. It was considered that this did not reflect evolving changes in working and living in rural and peri-urban locations. It was suggested there was a creative approach to managing alternative land use – for example through the creation of green and blue fingers, green space & amenity linkage, green belt transition zone, adaptive to changing needs.

Submitters suggested that the settlement classification and rural activity categories required further clarity and work. Place specific issues included significant opposition to industrial land development in Drury South area (pro-forma), mixed views on the Waitakere Ranges Heritage Protection Area (some submitters seeking greater protection/recognition in the plan and other submitters opposing the Act and seeking its removal from private land) and specific matters relating to Waiheke Island and Ardmore/Maraetai.

Auckland's Housing

There was overall support for the inclusion of a housing chapter and submitters considered housing to be central to Auckland's aspiration to become the world's most liveable city. There were mixed views expressed regarding the RUB and some submitters expressed concern over the RUB's negative impact on housing supply and housing affordability (refer also Development Strategy).

Submissions also highlighted a need to more fully develop implementation mechanisms to ensure that the housing objectives set out in the plan could be achieved. Some submitters called for the establishment of an urban development agency to implement an affordable housing programme (e.g. through streamlining the consent process, undertaking large scale comprehensive development).

There was support for housing affordability being recognised as a key issue in the Auckland Plan. Submissions noted that housing affordability is linked with other social issues such as poverty, health, family violence, education and employment prospects. There was also strong submitter support for the acknowledgement of the link between substandard houses and poor health outcomes and high energy costs (directive 9.3). It was considered that sustainable building design should be at the top of the agenda for new buildings. There was some concern that the plan did not mention the leaky building issue in Auckland.

Concern was also expressed over the concentration of state housing in certain neighbourhoods and its adverse impacts on social wellbeing and structural poverty. Further engagement with communities to identify housing preferences (including tenure preferences) was requested. Whilst some submitters were concerned with the development of a 'rental underclass' others felt that home ownership was not for everyone and that choice should include choice of tenure.

Auckland's Infrastructure & Transport

Submissions highlighted the important role infrastructure plays in developing urban form both as an enabler and as a limitation. The timing of infrastructure investment and the linking of that investment to Auckland's wider growth aspirations were also emphasised. A number of submissions supported further identification of region's critical infrastructure and protection of this infrastructure. Greater attention to planning and operating social infrastructure and an increasing profile for sports and recreation and parks was suggested. Improving the resilience of Auckland's infrastructure systems was a common theme, in particular provision of decentralised as well as centralised infrastructure. Sub-regional planning for infrastructure was supported.

A number of submitters note the inter-regional nature of Auckland's infrastructure networks, and highlighted the role of ports and airports. There was significant support (pro forma) for the Ports of Auckland's role and that the plan should give certainty to its future and make provision for investment required in transport infrastructure (both in its immediate vicinity and the rail network).

There was strong support for managing Auckland's transport as a single system integrated with land use. Many submitters supported the provision of transport choice. Submitters supported an integrated public transport system that is affordable, with some submitters support more water based transport (ferries). There was generally strong support for the CBD rail loop although some submitters expressed concern that connections to other parts of Auckland also needed to be improved. There was strong support for improved infrastructure for pedestrian and cyclists, and in particular improvements to the regional cycle way.

However concerns raised in the submissions include:

- Too much focus on public transport
- Public transport needs to be affordable and reliable – support greater priority to bus rather than rail
- In planning for future capacity the plan should not overlook private vehicles as an option

Submitters also suggested that the plan give greater attention to inter regional connections and rural transport (e.g. road sealing, public transport). There was support for changes to parking policy and better parking regulations.

There were a number of project specific matters identified in submissions relating to the City Rail Link, Waitemata harbour crossing, Rail to airport, Puhoi to Wellsford project, Penlink and AMETI project (timing). There was strong support for an interchange at Puhoi as part of the Puhoi to Wellsford project.

Auckland's People

The majority of submissions strongly agreed with the priorities of putting children and young people first, improving the education, health and safety of Aucklanders with a focus on those most in need and strengthening communities. The inter-relatedness of social issues to other parts of draft plan

was acknowledged in submissions. A substantial number of submitters raised new priorities for consideration:

- An increased focus in the plan on older people
- Explicit inclusion of people with disabilities
- Addition of parents and or families to the putting children first priority
- More recognition of the role that sports and recreation can play in meeting the strategic direction and priorities

Some submitters sought further consideration on how community views on major social issues (alcohol, tobacco, gambling, family violence) could be incorporated into the plan. In particular, the need to consider the effects of alcohol and alcohol related harm (location of liquor outlets etc.).

There was general agreement and support for the **Southern Initiative**. A number of submitters noted that reducing deprivation and improving socio-economic outcomes in South Auckland would have benefits for all Auckland. However, submitters also noted that there are also pockets of significant disadvantage in other parts of Auckland and these communities should not be ignored. Some submitters qualified their support for the Southern Initiative by noting that Council should advocate to and work with central government to achieve the stated aspirations, not seek to duplicate the functions of central government (e.g. in relation to education and housing). Greater clarity is needed that the plan is a plan for all of Auckland (see below). Submitters also requested more detail on how the southern initiative would be implemented.

Auckland's Maori

There was strong support in the submissions for enhanced participation by Maori through partnerships, embedding the Treaty of Waitangi principles in the processes and policies of the Auckland Council.

There was strong support for the development and progression of papakainga in the region – but it was suggested the purpose and function of papakainga needs further explanation and clarity. The concept encompasses other elements in addition to housing – village development supported by infrastructure, requiring a workable regulatory framework.

Submissions highlighted the role of Marae as central to the retention of culture, asset development and cultural wellbeing. Similar to papakainga, Marae require supporting infrastructure. A number of submitters pointed to a need to remove constraints on Maori land to facilitate development.

A number of suggestions were identified to enhance the Auckland Plan's commitment to Maori aspirations. From the majority of iwi submitters there was a strong call for more authority/delegated authority over matters of significance concerning waahi tapu, and more proactive relationship building by Council and central government. There was strong support for more proactive community involvement, emphasising rangatahi (youth) representation and targeted programmes to support youth at risk. Mataawaka indicated they would like further involvement in the development of all policy impacting on Maori. A number of submitters considered that there was a lack of economic policy and sought clarification on how Maori can contribute to Auckland's future growth –

it was felt that the economic development strategy needs further work in understanding the dynamics of the Maori economy. Submitters also proposed creating a new Maori outcome, to emphasise Council's commitment to Maori community outcomes and provide a stronger linkage between the Auckland Plan and the Long Term Plan.

Auckland's Arts, Culture, Heritage and Lifestyle

Submitters strongly support the material on arts and culture, and the role of arts, culture and heritage, sport and recreation in the lives of Aucklanders.

However, major areas of concern were the inadequacy of material on heritage and on sport and recreation – in terms of the amount of content in the plan, the actions and profile. There was overwhelming support for protection of heritage, particularly built heritage. Given the potential conflict with other goals, submitters considered there was a need for council to have strong, robust and transparent protection mechanisms for identification and management of heritage. Submitters noted that existing mechanisms in general were too weak or not applied consistently. Submissions also highlighted that Auckland has a unique outdoor environment and provides great opportunities for sport and recreation. Concerns were raised that despite the important role sport and recreation plays in social, economic and physical wellbeing of Aucklanders it has little profile in draft plan.

Submitters also felt there was insufficient recognition of the economic benefits of arts and culture and sport and recreation and felt there should be a closer link in the arts and culture section to creative industries.

Submitters expressed strong views that the place of Maori and Pacific Peoples need to be more visible in the community – through signs, art and decorative elements, as well as the ability to show and experience cultural knowledge and skills. The submissions considered that there was insufficient emphasis on role and contribution of the Pasifika communities in Auckland – and the plan needed to support Pasifika development. Some submitters felt the plan did not acknowledge or address potential impacts of significant increase in Asian population. Others felt diversity needed to be broader than ethnic diversity and encompass other elements.

Auckland's Economy

One of the major issues raised by submitters was concern over business land. It was considered that further work was required to better understand the amount and location of future business land supply so that capacity constraints do not hamper economic growth. Further information was also sought by submitters on industrial clusters and Auckland industry in general. Some submitters highlighted the need for active management and protection of existing business zoned land, examples provided included Highbrook and the International Airport.

There were many submissions related to ports and airports – all recognise the crucial role of ports and airports as key drivers of economic development (see development strategy). The majority see

the role of ports of Auckland as crucial to achieving the vision for Auckland and considered that the plan should give certainty to its future.

A further major issue raised by submitters was the role of Maori in economic development (see Auckland's Maori). Similarly it was considered that the uniqueness of Auckland is its pacificness, and that this needs to be better reflected in the plan, enabling Pacific people to be productive players in the Auckland economy.

There were suggestions for additional sectors (equine, aquaculture, sports and recreation) to be included in the plan. Submitters also noted the plan could strengthen recognition for regional (and global) interlinkages and interdependencies, for example links with universities/migrant communities to build collaboration and networks to grow export industries.

Auckland's Environment

Submitters support green growth, sustainability, the eco-city approach, wildlife corridor networks, enhancing parks and open space, protecting streams and harbours, controlling the waste stream and reducing landfill waste. There was overall agreement with a compact city approach in order to limit adverse environmental effects. However, it was noted that growth brings environmental challenges as well as potential conflicts if Auckland commits to sustainability.

Some submitters sought stronger acknowledgement of people's connection to the environment. This was supported by a stronger focus in the plan on education on sustainability (in particular for migrant communities) and support for community-based restoration initiatives (e.g. Kaipara Harbour Group, Kaipatiki Project, Guardians of Upper Harbour).

Submissions provided support for biodiversity protection and restoration including recognising the importance of biosecurity in Waitakere and Hunua ranges. Several submitters recommended better management for Maui dolphin and wading birds – and bird roosting sites.

Submitters also agreed with the blue-green network of parks and reserves including support for improving local freshwater bodies, continued acquisition of land, protection and restoration of biodiversity. Further protection of Auckland's volcanic field and outstanding natural landscapes and features was also raised in submissions. There was popular support for strengthening tree protection rules.

Some submitters considered that air quality issues needed to give greater acknowledgement of the contribution of home heating to poor air quality and associated health impacts. These submitters considered the industry burden was onerous, given that industry was not the most significant emitter and already subject to regulation and significant consenting requirements.

Submitters highlighted concerns over deteriorating water quality in particular concerns about sedimentation, nutrient runoff, heavy metal and pesticide pollution. There was strong support for sustainable water management approach and improvements to water quality through riparian management, water sensitive and low impact design approaches.

There was strong support in the submissions for a high quality coastal environment and concern about existing degradation. Mangrove removal was supported in a number of areas. Submitters also sought greater clarity on indicative marine protected areas and what these areas will mean in practice.

Submitters also were concerned about natural hazard risk in particular noting earthquake risk to older buildings and land prone to subsidence and flooding. The conflict between natural hazard risk management and a compact city approach were noted in a number of submissions, as risk increases with population concentration. The need to build resilience into Auckland communities and infrastructure were highlighted across submissions.

Auckland's Response to Climate Change

There was strong support for council's aspirational target to reduce GHG emissions by 40% by 2031 based on 1990 levels and comprehensive response to energy and climate change (mitigation and adaptation). However submitters considered that the plan lacked information and detail and did not provide an adequate policy framework for adapting to projected effects of climate change. Submitters requested further identification and mapping of risk prone areas together with rules to ensure development was not allowed in these areas.

Many submissions highlighted the strong inter-relationships climate change and other policies, for example energy resilience and security. Valuing food production in Auckland and facilitating the development of renewable energy resources were important aspects of climate change policy for rural Auckland.

Implementation

A common theme across a number of submissions impacting across the chapters of the plan was the need for clarity around the role of Auckland Council and other parties. There is a need for the final version to be more explicit that the Auckland Plan is a plan for all Auckland and will require action, commitment and funding from many parties. It is not simply a description of what the Council intends to do over the next 30 years. This caused confusion for a number of submitters particularly in those sections of the draft plan (e.g. Auckland's people, Auckland's economy) where Council has traditionally had limited influence.

The implementation framework is considered a necessary mechanism to deliver the strategic directions and priorities of the draft plan. Several submitters support creating a prioritisation framework to assess projects and their contribution to the outcomes of the plan. Clear communication is required on how the plan's objectives will be funded, how Council intends to report on the targets and responsibility for collecting, reporting and auditing target information.

There was support for the emphasis on collaboration and partnership in policy development, plan implementation and service delivery. In particular submitters supported council working with central

government to develop shared decision-making such as the 'better business case' approach outlined in the National Infrastructure Plan.

The identification of a suite of flexible tools and revenue funding options to address funding gaps was supported by submitters. There was general support for seeking better value out of existing investments and the need to undertake a thorough cost benefit analysis for large scale projects.

Internal alignment of plans, strategies and investments was supported by submitters. However, it was considered that the lack of statutory status for the Auckland Plan in terms of the RMA framework was problematic. A number of submitters sought greater clarity around the council's planning framework and the Auckland Plan's relationship with other plans. Submitters noted the Unitary Plan and Long Term Plan as key implementation mechanisms for the Council in delivering the Auckland Plan.

Submitters noted concerns regarding:

- significant increased costs on Auckland residents and ratepayers after 3 years of recession
- Council entering into additional debt funding
- how the plan's objectives will be funded, how it intends to report on the targets and responsibility for collecting, reporting and auditing target information – clear communication required
- how Council will put children at centre of its policy, planning and decision-making processes
- lack of detail implementation plan for southern initiative
- getting prioritising and sequencing of projects right to deliver growth objectives and community outcomes

The need for a prioritisation framework to assess projects and their contribution to the outcomes of the plan was raised by several submitters. In some areas it was felt the plan needed more detail on how prioritisation would work together with evidence of wider economic benefit assessment to determine value for money (transport chapter).

Several submitters believe there is a need for a public agency that will support appropriate intensification methods by assembling land for redevelopment to higher densities and to sell to developers. More collaboration and partnerships are required with private and public sector to deliver urban development.

Although there was general support for measuring and reporting on progress, many submitters felt that targets across the plan (e.g. economic targets, waste targets, infrastructure targets) were unachievable and required further work.

There was some concern over the consultation process and the tight time-frames impacting on people's ability to respond comprehensively to the draft plan. Submitters conveyed that enhanced public consultation (e.g. using visual tools) would contribute to a greater understanding of the Auckland Plan including the need for intensification and support for a compact city, as well as input into design. This on-going communication effort will help to ensure that the Auckland Plan retains relevance and becomes an enduring plan.

