



Submission of Civic Trust Auckland

Future Development Strategy

Contact name: Mrs Audrey van Ryn (Secretary)
Organisation: Civic Trust Auckland
Phone: 021 0354431
Email: cta@civictrustauckland.org.nz
Postal address: PO Box 29 002 Epsom, Auckland 1344

Introduction

Civic Trust Auckland (CTA) is pleased to have been invited by the Future Development Strategy Team to submit as a regional stakeholder on the strategy, as well as being invited to present directly to the Planning, Environment and Parks Committee on 28 July.

We have read the following consultation documents for the FDS and have used the abbreviations indicated, with quotes from these documents in *italics*:

- Overview Document (OD)
- Consultation Draft (CD)
- Summary Document
- Future Urban Areas Evidence Report (FUAER)
- Growth Scenarios Evidence Report
- Overall Evidence Report (OER)

CTA has made [submissions](#) over the 5 decades since our establishment, most recently through the amalgamation of Auckland and subsequent planning initiatives initiated at both local and central government levels. Our past submissions have included the Auckland Unitary Plan, Plan Change 78, the government's Emissions Reduction Plan, the Government Policy Statement on Housing and Urban Development, the National Policy Statement for Freshwater Management, and Auckland's Climate Action Framework.

In this submission, we answer the consultation questions 1-4 and then submit other feedback (5A-E).

We made an oral presentation to the Planning, Environment and Parks Committee at 2.30pm on 28 July, 2023 at the Organisation / Interest Group Have Your Say Event. A record of that presentation follows our submitted answers to the consultation questions.

FOCUSING GROWTH

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

We agree.

Quality intensification with sufficient green space and trees

- 1 CTA considers it is essential to concentrate most, if not all, of the growth in the existing urban areas. We support intensification within the existing urban area and the development of townhouses, units and apartments, as long as these are of good quality and there are sufficient green spaces and trees allowed for.

Concentrated development

- 2 CTA supports the multi-nodal approach, for the reasons stated in the FDS: this will generate an increasing number of jobs, bring housing and jobs together, and reduce the need to travel. We support the following: *"We will prioritise growth and infrastructure investment closer to the city centre and subregional nodes within the existing urban area, to assist the council's financial management and value for money for Aucklanders, while also addressing disparities in infrastructure and service provision.... Development in the existing urban area supports the most efficient use of infrastructure for the least monetary cost over time (CD, pg 19).*
- 3 Future urban areas, defined as *"new greenfield areas to be established on the fringe of the existing urban area, and in rural and coastal settlements"* (CD, pg 6) would seem to pose a challenge to the rural-urban boundary and conflict with the statement on page 39 (CD) that *"The intention, however, is not to expand further into rural land."* Furthermore, coastal settlements are subject to hazards due to climate change and therefore not suitable for development. We do not support development on the fringes of the existing urban area and in rural and coastal settlements.
- 4 Rather than the less growth and slower growth the FDS proposes in future urban areas and limited growth in rural areas, we submit there should be no greenfield areas provided for at this stage. As noted in the FDS, providing infrastructure in greenfield areas is costly and Council does not currently have the funding capacity for this.

Irreversible loss of productive land

- 5 The FUAER states on page 3: *"2021-22 monitoring showed that 60% of the dwellings consented in future urban areas were for standalone houses (Auckland Council, 2022)."* This does not provide good dwelling capacity and at the same time poses the risk of removing valuable fertile land from productive use, irreversibly.
- 6 As expressed on page 102 of the OER, the NPS-HPL is concerned to maintain the availability of highly productive land for primary production for future generations and protect it from inappropriate subdivision, use and development. Long-term planning is needed to ensure food, water and natural resources are available for future generations.

- 7 CTA submits that Auckland cannot afford to lose any more productive soil. Recreation, tourism and residential growth must happen in areas that do not have soil that is good for growing food. We submit that “countryside living” (CD, pg 43) can be provided for in other parts of New Zealand rather than in even moderately environmentally sensitive and economically productive areas in Auckland.
- 8 CTA submits that productive land in Pukekohe that has not already been built on should not be built on. As stated on page 42 of the CD, *“The southern rural area has a unique combination of temperate climate and frost-free fertile land, which enables a wider range of vegetables to be grown for longer periods than other parts of the country. This makes a significant contribution to the food supply for Tāmaki Makaurau and New Zealand.”*
- 9 We support the intention of *“Protecting rural production by minimising land fragmentation and reverse sensitivity effects to safeguard highly productive land”*
- 10 The 7-8% of Auckland’s highly productive land should be preserved for agriculture only and re-zoned as a rural production zone. CTA is opposed to new businesses being established on productive land, particularly land extensive businesses. Our future planning should give consideration as to whether they will support human and ecological wellbeing, will not produce things that are not needed, will focus on local consumption of their products, and become part of a circular economy.

Emissions / adaptive re-use

- 11 We strongly support the reduction of greenhouse gas emissions through a compact urban form with greater density, mixed-use and limited urban expansion. Urban expansion uses up productive land, leads to species loss, and results in commuters using private transport over long distances. We note the concern expressed in the OD on page 3 about *“the ongoing degradation of the natural environment”* and the importance of addressing that concern.
- 12 We concur that locating homes and jobs in close proximity is important, to reduce emissions and the cost of travelling. Free public transport can also address these issues.
- 13 CTA submits that greater consideration should also be given to adaptively reusing existing buildings rather than demolishing and building anew. This is more sustainable both in terms of minimising the city’s carbon footprint and also to preserve neighbourhood character. The character and quality of the environment has both social and economic benefits. .. contribute to a well-functioning urban environment

Quality compact urban form

- 14 The compact urban form means more high-rise, and, in our view, this is what is needed. However, such development needs to be good quality, both aesthetically and in the quality of materials and construction. Many housing developments from the last few decades are currently undergoing costly remediation works, due to poor quality design and workmanship as well as inadequate inspection by Council.
- 15 Urban design has a significant impact on how people live in cities, as well as on the economic performance of cities. Poor quality urban planning can result in isolated communities, underperforming and underused transport networks, and low-quality public

spaces that are later upgraded (in some cases, repeatedly) at a high cost. On the other hand, we do not support redesigning public spaces that currently work well, especially in these times when we can ill afford to do so.

- 16 Good design includes not just the structure of a building but the landscaping – including provision for vegetation, which reduces heat island effects – and the interface with the street and nearby buildings. Good design adds to the amenity of a neighbourhood, and new buildings should be designed to be in keeping with or sympathetic to the streetscape values including: views, viewshafts of important buildings and landscapes, architectural style and unity of form and scale. Design controls relating to such aspects as sunlight, privacy, and outdoor living space can either be life-enhancing or not.
- 17 The CD (pg 32) states that *“There is also a renewed focus on aspects of quality.”* CTA is of the view that the quality of our built environment and current public open spaces can be greatly improved. We submit that the [Urban Design Manual](#) should be referenced in the FDS, and that consideration be given to the appointment of a City Architect.
- 18 As per the key considerations on page 36 in the CD, we endorse the importance of good environmental outcomes and the well-being of the inhabitants of housing developments. We know of people who are stressed by noise, both external and internal (the latter from neighbours in the same complex), lack of privacy, lack of sunlight and poor heating, among other matters. We are of the view that there is more scope in developments for people to be encouraged to share spaces and utility items with neighbours, such as gardening tools and Council rubbish bins. We also submit that developers’ names be inscribed on an outside wall of their developments so the good ones and the bad ones become more widely known.
- 19 We support the inclusion of “reverse sensitivity effects” in the key considerations on page 10 (OD). In our experience to date, the complaints of residents in urban areas about the effects of noise, air pollution and disturbances from light pollution, e.g., from electronic billboards, as well as the location of liquor stores in their communities, are minimised in decision making.

Quality - heritage and character

- 20 Page 73 of the FUAER says: *“Appendix 1 of the AUP requires a structure plan to identify, investigate and address the following matters ... natural and built heritage (the existence of natural and physical resources that have been scheduled in the AUP in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character).”*
- 21 CTA maintains that Council has not fully identified historic heritage and that there are many items that are not yet on the schedule that should be.
- 22 We are aware that some of the *“single house developments on large sites that are making way for more intense developments”* (CD, pg 35) are historic heritage or special character buildings. These properties are valued by the communities in which they are sited and each one should be assessed on its merits rather than demolished for the sake of intensification.

- 23 We also submit that the potential of existing historic/special character areas to provide the required density has not been adequately considered.
- 24 CTA submits that growth and development have already altered or destroyed much of Auckland's historic heritage and places of cultural importance instead of integrating them. We further submit that the integrity of already established areas should be preserved where possible in order to maintain their amenity values. There are good examples of how new and larger dwellings have been well integrated, e.g., Middleton Rd in Newmarket and in Westmere.

ACCESSIBLE LOCAL CENTRES

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

We agree.

- 25 We agree that neighbourhoods need to be more sustainable (OD, pg 6).
- 26 CTA agrees with the logic of intensifying development within walkable catchments. However, we are of the view that addressing car dependency requires more than providing work opportunities that are nearby and better walking and cycling infrastructure.

AVOIDING HAZARDS

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

We agree.

- 27 We support the approach that "*Areas at higher risk of natural hazards are avoided, and infrastructure investment is focused on resilient solutions*" (OD, pg 4) and agree that it is important to develop adaptation responses in already developed areas that are at higher risk of natural hazards.
- 28 We strongly support principle 2(a): "*Avoid further growth in areas exposed to hazards and promote resilient design solutions*" (CD, pg 17).

RESILIENT INFRASTRUCTURE

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

We agree.

- 29 As we said in our submission on the Annual Budget 2023/2024 at 4(b) under Storm Response: "CTA would support the incorporation of nature-based solutions, including the protection of mature trees and increasing Auckland's urban ngahere." In addition, in the same submission we said: "Council should consider purchasing properties adjacent to

flood zones, converting them to parks, and/or planting them with native trees to stabilise the land and soak up stormwater. Council should plan to restore wetlands and forests in vulnerable areas.”

- 30 We strongly support Principles: *2(b): Prioritise integrated, naturebased, regenerative and resilient infrastructure; and 2(c): Support communities to develop appropriate adaptation responses in high-risk areas*” (CD, pp 17-18).

OTHER FEEDBACK

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

Yes, as follows.

A. UNCERTAINTIES - capacity, staged targeted growth and food security

- 31 On page 13 of the CD it is said: *“There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years”* (pg 13).
- 32 On page 23 of the CD, some of the difficulties of planning for long-term growth are outlined. And on page 25, it is stated: *“The future is uncertain. There will be many changes in the global and local political, environmental, social, economic and cultural landscapes that will influence how we grow and will impact on the success of Tāmaki Makaurau.”*
- 33 Although we recognise the importance of infrastructure planning, CTA is unsure about the growth predictions that the FDS is based on. Some of Auckland’s population will move overseas, primarily for jobs, and there is migration within the country, often due to people seeking a less busy, healthier or cheaper lifestyle elsewhere.
- 34 Furthermore, we are aware that growth at the rate that Auckland, Aotearoa-New Zealand and the world has been experiencing over the last few decades is often described as unsustainable. This is acknowledged by climate change actions in the FDS. We feel that limiting growth, including particular kinds of growth, should be a strong consideration for the FDS.
- 35 CTA supports principle 5: *“Enable sufficient capacity for growth in the right place and at the right time”* (OD, pg 5) and suggests that the right time needs to be informed by population trends and work trends, among other factors.
- 36 We agreed with Council’s submission to government that there was no need to create further theoretical capacity beyond the 900,000 potential development sites available under the provisions of the Unitary Plan, which were intentionally and logically planned for around infrastructure provision across the region, including along transport corridors. The Unitary Plan provisions were purposefully calculated within the context of the Auckland Spatial Plan’s projected growth of one million people by 2040.

- 37 Our view is that Auckland has enough capacity for growth for the next 30 years and we don't know how much growth is needed after that. We submit that flexibility in planning and the use of spaces is important. Further, it is our view that staging of intensification can provide for the required or projected capacity now, and more when it is needed, with a review of intensification at 10-year intervals.
- 38 CTA supports the principle to *“Align growth to committed infrastructure (funded in 2021 Long-term Plan) and minimise the expansion of existing infrastructure networks as much as practicable to reduce costs of new infrastructure”* (OER, pg 17).
- 39 We further submit that areas with low heritage and landscape values should be where intensification should be prioritised, alongside other considerations such as near transport nodes. Such areas may include current poor developments and thus allow for improvements to these areas.
- 40 On page 10 of the OD, it is suggested that *“Over the next 30 years around 282,600 new jobs may be needed.”* This guesstimate does not take into account the changes acknowledged on the same page, brought about, not only by COVID-19, but by advances and changes in working and trading over the last couple of decades. Many businesses have an online presence only and have no need for physical premises. Many people work purely in a digital world, using their home as their workspace. This is stated in the CD (pg 46): *“Remote working and flexible working hours have become the norm in many sectors, with the resultant change in where and when people work. Online working and trading have similarly become normal parts of business practice.”*
- 41 Further, the type of business that might move into a dedicated space cannot always be predicted. An example is opposite the town hall, where, for several decades, there has sat empty a series of small retail/business spaces, which apparently do not suit potential businesses. During the pandemic, many retail and office spaces in the city centre were left empty because people were working either entirely or partly from home. We understand that some of these spaces are now being converted to residential use.
- 42 As stated on page 75 of the OER, *“Auckland is moving towards a more service-based economy (i.e., more demand for jobs such as public administration, financial and insurance services, rental hiring and real estate industries). In the short term, this will influence business land demand.”*
- 43 As for studying closer to home, many university students are no longer attending lectures in person but instead, listen to lectures online, and also forgo attending tutorials. This suggests that the universities may not need to expand anymore.
- 44 It is noted on page 64 of the OER that *“Consumer habits are evolving, including a movement towards less red meat in diets, more plant-based diets and a niche but significant trend towards buying local produce to support local economies and support climate change goals (“low food miles”). Such changes in consumption habits may have an influence in the future on food systems in Auckland – what food production occurs in Auckland, where it is produced and how it is produced.”* This is part of the uncertainty or change that occurs in communities, and suggests that local production (such as in Pukekohe) will in the future be relied on more.

B. INEQUITIES

- 45 CTA supports the intention of the FDS to address inequities across the region by prioritising investments in the parts of the region that need it most (OD, pg 4), rather than *“Prioritisation needs to be based on what provides the most benefit for the whole region, rather than considering outcomes in isolation or in separate geographic area”* (OD, pg 8), which seems to be a contradiction.
- 46 As mentioned earlier, a way to *“improve equity of access to and enable a greater distribution of jobs”* (OD, pg 17) would be to make public transport free, a co-benefit being to help reduce the city’s carbon emissions.
- 47 *“Development must provide broader outcomes for all Aucklanders. Food sovereignty is critical and development must enable spaces for whānau to grow their own food and provide safe places for tamariki to play and socialise particularly in higher density areas”* (CD, pg 11). CTA strongly supports food sovereignty but we observe that there is no room for growing food or playing outside in some consented developments, due to the rules enabling the rear and side boundaries to be as close as 1 metre from the house. This lack of space also does not enable landowners and communities *“to create urban ngahere and grow the canopy across the city [to] mitigate the impacts of climate change”* (CD, pg 11).
- 48 CTA supports enabling the development of Māori and Treaty settlement land, subject to any overarching legislative constraints.
- 49 We have suggested in earlier submissions that accessing the reportedly 40,000 “ghost houses” in Auckland might usefully contribute to increasing the availability of housing. So would investing in more co-housing models, such as the one at Abbeyfield in Sandringham, not just for older people but for all ages.

C. PUBLIC OPEN SPACE AND THE NATURAL ENVIRONMENT

- 50 CTA strongly supports principle 4: *“Protect and restore the natural environment”* (CD, pg 21) and notes that in addition to the observation that *“Development and intensification can put pressure on the natural environment”* (CD, pg 21) it also puts pressure on the built environment that already exists, and which, when it is a historic and/or quality environment, is valued by the people who currently live/work/play in that environment.
- 51 We strongly support principle 4(a): *“Protect ecosystems and integrate the natural and built environment”* (CD, pg 21). Much biodiversity has been lost due to developments that are insensitive to the ecosystems into which they are incorporated. Obvious examples are trees being removed so that more floor space can be obtained.
- 52 We recognise that partnering with mana whenua and drawing from mātauranga Māori can enable greater outcomes (OD, pg 5). However, the intention of the Tūpuna Maunga Authority to remove exotic trees on various maunga, against the strongly expressed wishes of some of the people of Auckland other than mana whenua who also value the maunga and appreciate the value of those trees indicates that consultation needs to be more inclusive.

- 53 On page 12 in the CD, it is observed that *“Unprotected urban ngahere are declining on private land, particularly mature trees that would otherwise provide irreplaceable ecosystem services.”* CTA submits that if the general tree protection rules were reinstated, some loss of the urban ngahere would be prevented. In the face of tree loss, adaptive re-use should be considered by means of tree transplanting ?
- 54 The importance of public open space and its multiple functions is acknowledged (CD, pg 21): *“Enabling community uses of public land, such as gardens and urban farming provides another way to increase biodiversity and connect ecosystems. This contributes to climate mitigation (through localised food production), fostering a sense of community, minimising urban waste and contributing to circular economies.”*
- 55 This enabling should involve supporting groups such as The Love Of Bees, which proposed an urban farm on the Bowen Ave part of Albert Park. This group was informed by the Waitemata Local Board that getting approval would be difficult and that a resource consent would be needed. The Love Of Bees is a small charitable trust with very limited resources, working to transform Aotearoa’s food system so that it is safer for our pollinators, people and planet through regenerative organic horticulture. It deserves assistance rather than resistance from Auckland Council, in line with Council’s own principles, including those on page 21 quoted above, and the following statement in the appendix (CD, pg 58), under Advocacy, research and non-statutory approaches: *“Investigate ways to encourage multiple uses for open space, greater planting of roadside berms and use of vacant council sites for community gardens/urban farming and local composting.”*
- 56 We also submit that Council should further support the planting of fruit and nut trees throughout the city, as we understand is happening in some eco-neighbourhoods, and also support the establishment of Pātaka Kai and community fridges, infrastructure initiated by the community that addresses both food waste and food security: mini infrastructure that is cheap and easy to install that has a big impact on people’s wellbeing. (CTA is pleased that the roll-out of food scraps service bins and community recycling centres is underway.)
- 57 We support *“investment in infrastructure, public spaces and streets to create better environments for both people and nature”* (CD, pg 34).
- 58 CTA supports the provision and extension of parks and green spaces to provide amenity for the local community and the local biodiversity, as well as all the other benefits that accrue from green space.
- 59 We particularly support the guidelines on page 34 (CD) for local growth of the green-blue network: *“Protect and grow sensitive environments including natural and cultural heritage.”*
- 60 CTA supports tree protection and plantings (OER, pg 28) and we support the *“implementation action to change the AUP to strengthen protection of existing vegetation and encourage or require new planting and ecological connections”* (OER, pg 30). However, if bigger developments on smaller sites continue to be enabled, tree protection and the planting of new trees is often difficult.
- 61 We would also like our Auckland beaches to be swimmable.

D. TRANSPORT

Light rail

- 62 We question introducing light rail to replace some of Auckland's most heavily used bus routes (CD, pg 36). Electric buses are replacing diesel buses and more buses could be added in, including smaller buses. The infrastructure for buses is already in place. Building new infrastructure runs counter to the principle of using infrastructure that is already in place and not building new infrastructure unnecessarily: "*Principle 3(b): Make the best use of existing infrastructure*" (CD, pg 19).
- 63 We also suggest that in 2023, if buses have not succeeded in getting enough cars off the road, despite low fares and other incentives or improvements, we cannot be certain that light rail will convert car-driving commuters into public transport commuters. The current bus/train system already provides capacity for tens of thousands of Aucklanders to use it for commuting and other purposes. In addition, the community that it is suggested will be regenerated by light rail may be resistant to the potential disruption and segmentation of their area.
- 64 Furthermore, we do not think it would be fair for properties to be compulsorily acquired along the light rail corridor when there are other options for public transport.
- 65 The "convenience, reliability, safety and comfort" that is argued for light rail as a highly attractive public transport option (www.lightrail.co.nz) could equally be argued for many of the current bus and train options. The fact that rail is permanent is sometimes a positive but it is a negative if the line needs upgrading or maintenance work, as is the case with the Eastern line between Britomart and Ōtāhuhu from 20 March 2023 until (at least) January 2024. It would also be a negative if the line is subjected to damage or impassability from flooding/subsidence/earthquake etc. or businesses don't want to set up near a particular station. Bus routes, on the other hand, can be redirected. Bus transport has more resilience than rail in some aspects.
- 66 The description on page 50 in the Consultation Draft appendix states: "*Auckland Light Rail (ALR) The City Centre to Māngere light rail (ALR) is a planned rapid transit line that will provide a fast and efficient connection between the city centre and Auckland Airport and have up to 18 stations. The route alignment has not been confirmed at this time.*" CTA suggests that, in line with the principle to use the existing infrastructure and the uncertainty and lack of funding, that the already existing city centre to airport link be better used and there be no new link constructed.

Network flexibility and extension

- 67 CTA is very much in support of a train line going further north, to serve not just the North Shore but the communities beyond the Auckland region.
- 68 CTA also supports the rapid transit corridor from Red Hills North to Kumeū-Huapai and the walking and cycling corridor adjacent to the Rapid Transit Corridor, as well as the rapid transit corridor from Westgate to Albany or Constellation Drive to provide for direct public transport between the North Shore and West Auckland.
- 69 CTA submits that there needs to be less focus on future train stations and more on future bus stops. Bus stops can be easily moved to serve locations where growth actually takes place and passengers can easily change buses to travel on a different route. Integration

of more than one mode of transport works well for many people and should be encouraged.

Proximity to work

- 70 The target to achieve net zero emissions by 2050 needs work by all of central and local government and all citizens, and the FDS does its part to address that by enabling housing near employment, extending mixed-use areas to centres and transport corridors so people can easily access services, employment, recreation and education by walking, cycling or public transport. However, CTA is of the view that simply providing transport corridors does not necessarily mean that people will walk, cycle or use public transport.
- 71 One of the criteria for the four growth scenarios presented in the OER is the *“Extent to which household living costs can be reduced by increasing proximity to employment opportunities”* (pg 14). Another approach, with many co-benefits for many sectors and across the city (e.g., retail, and community physical and mental health) would be free public transport. This would also help with carbon emission reduction. Free or heavily subsidised and frequent public transport is an ongoing campaign in NZ/Aotearoa as well as other places, and its other benefits are listed [here](#). If people can travel for free and can be usefully occupied while travelling, e.g., accessing their smartphones, then travelling time becomes work time (rather than the (mostly) downtime when travelling in a private vehicle) and there is less pressure on having employment provided near to where people live.

Transport user flexibility

- 72 With regard to: *“As priorities change, trade-offs need to be made (and re-made) to ensure Aucklanders are getting the best value for money from infrastructure investment”* (CD, pg 13), we submit that light rail to the airport should be reconsidered. There is already an integrated public transport system in place, with a bus to Puhinui Station and a train to Britomart and elsewhere from that station. This station is an important part of the city’s infrastructure. As Puhinui Station connects to the wider public transport network, you can travel to and from Auckland Airport from anywhere in the city. The bus operates every 10 minutes from 4.30am to 12.40am, 7 days a week and there is a train from Puhinui Station to Britomart every 15 minutes. However, this AirportLink service is not clearly signposted at the airport and we understand that it is used very little. The facility to use public transport without needing a HOP card, as planned within the next 12 months, should help in this regard, but the AirportLink service needs more publicity. For example, the staff at the airport who monitor cars that arrive at the domestic terminal to pick up incoming passengers could hand drivers brochures that describe this service, so people can use it next time.
- <https://at.govt.nz/bus-train-ferry/bus-services/airport-services/>

Bridge and bikes

- 73 The Waitematā Harbour Connection project investigating multi-modal solutions for future options to cross the Waitematā Harbour should include making a lane available for cyclists. It should also consider including bike racks on all buses going over the bridge. Greater mode choice and accessibility for crossing the harbour should include walking and cycling. In Wellington, many buses have bike racks, and, as stated on the Metlink website they will be *“Introducing bike racks on the entire fleet of new buses.”*
- 74 A lane for cyclist and pedestrian use on the Auckland Harbour Bridge and/or bike racks on buses would not involve the *“significant investment”* or *“complex construction”*

mentioned on page 50 of the appendix, instead, it would be a quick and cost-effective solution to provide more transport choice.

E. DEFINITIONS

- 75 CTA is of the view that it would be helpful to include early in the FDS an explanation of what “infrastructure” means, what “bulk infrastructure,” means, what “infrastructure-ready” means and what “social infrastructure” means.
- 76 The list in Appendix 6 on page 25 of the CD is helpful, viz: wastewater projects, water supply projects, rapid transit projects and other transport projects. The “infrastructure” definition can be further informed by Figure 18 on page 42 of the OER as well as the following, on page 19 of the CD: *“The council is responsible for providing regional transport, three water services, parks and community facilities, waste, arts, culture and urban regeneration. Ports (both sea and air) state highways, telecommunications, electricity, gas and petroleum suppliers, health and education providers all provide infrastructure for Aucklanders.”*
- 77 Page 45 in the OER has this further information: *“The definition of infrastructure is broadened to include investment in ecological infrastructure such as urban ngahere forests, blue and green networks to absorb extreme events and hyper-accessible local transport that prioritises non-private vehicle movements.”*
- 78 “Reverse sensitivity” should also be defined, perhaps using [this entry](#) from Wikipedia.

CONCLUSION

- 79 CTA supports the Future Development Strategy Strategic Spatial Framework (OD, pg 8). The compact urban form for Auckland and the four-nodes approach seems the best future for Tāmaki Makaurau to aim for, at the same time, protecting our natural resources, striving for a healthy environment and improving our public transport system.
- 80 Scenario A in the Overall Evidence Report does seem to be the best performing (pg 12).
- 81 CTA supports making the best use of existing infrastructure and investment decisions that deliver on multiple outcomes. It would seem to be good practice that *“The infrastructure triggers will be reviewed regularly to ensure they reflect latest information”* (Appendix 6 of the CD, pg 25).
- 82 There is acknowledgement in the documentation that development is not only about the creation of roads, buildings, civic or industrial infrastructure but includes ecology and the green areas of a neighbourhood. These different aspects are all important for the future of a city that caters for a range of needs of the citizens who choose to live there.
- 83 What is not acknowledged is that there has been too much growth on our planet as a whole and we are still heading down the path of having more people than the planet can comfortably cater for, at least, if we continue building hard infrastructure, if we continue polluting and if we continue using up the resources of the land. We are now living in a time when we all need to be aware of what impact our actions are having on our planet. We cannot have infinite growth, unsustainable resource consumption and harmful

pollution on a finite planet. Not only where growth takes place and what sort, but how much growth should be a prime consideration of the Future Development Strategy.

We include below a record of our presentation to the Planning, Environment and Parks Committee on 28 July, 2023.

Date of submission: 31 July, 2023

Signature:



Audrey van Ryn
Secretary, Civic Trust Auckland



On behalf of Civic Trust Auckland, presentation by Allan Matson (President) and Audrey van Ryn (Secretary) to Auckland Council's Planning, Environment and Parks Committee on 28 July 2023

Allan Matson:

Thank you everybody for having us. We are pleased to be here. Just by way of introduction, Civic Trust Auckland is a community-based group largely with a focus on the environment and good planning, and we've been in existence for 55 years.

We've come here to endorse in general the approach Council is taking with its Future Development Strategy. We support in general your initiatives in response to the questions that you have asked. Going to questions 3 and 4 about the environmental hazards, and the need for nature-based responses in light of what has happened at the beginning of the year, that seems eminently prudent, and so there will be equity issues in how that's dealt with, potential purchases of land that have been developed, that presents a challenge for Council and whoever might pay for it, but there is some community support for that.

In terms of the concentration of intensification, that seems quite logical and sensible as well. We don't support greenfield developments. We support the compact urban form in existing areas, which we contend supports Council's climate change targets, and with regard to that, we think there should be greater consideration given to notion of 'adaptive reuse' of the resources that we've got in further development of the city, and that applies to not only the built environment, but it may also involve trees.

Appendix 1 of the AUP refers to structure plans where you would identify the existence of natural and physical resources having been scheduled in AUP, and that covers matters of interest to Mana Whenua, natural resources, and physical resources. That is one of the key things Civic Trust wish to convey. There seems to be a longstanding difficulty in dealing with the environment to the extent that there is a persistent misunderstanding the environment is comprised of only the natural environment. Until the Resource Management Act is changed, the environment does include physical resources, and CTA considers there has been a longstanding lack of appreciation of some of those aspects of the environment which will contribute to the quality built form that we are all pursuing. We don't want to live in Pyongyang. There are a great many quality aspects of our built environment and we would like to see them retained. That will involve properly assessing some of the built heritage and aspects of the natural environment that we value.

We'll cover off in our written submission points in relation to your questions, but just to raise several other things.

There is a great deal of uncertainty, it would appear these days, about what is going to happen with climate change, and the population projections. The Unitary Plan did have, we think quite rightly, provision for growth for many years, and that provided by the Unitary Plan did seem to be usurped somewhat by Government's moves in relation to the NPS and MDRS. We would support the further intensification envisaged under the NPS, i.e., further intensification around 'walkable catchments' seems sensible, although the 'at least six stories' does not necessarily present a problem, but it's an unquantified thing, because it does sound like it's high density development if it just says 'at least.' So I think there's some merit in putting parameters around that, given that 900,000 was enough for decades anyway, and we don't think that the reduction of any development capacity that arises as a result of the Infrastructure Review should necessarily be transferred to areas that weren't impacted, once again, because we think there's enough capacity. Intensification should be a staged thing because we really don't know the environment in 10 years' time.

We also have concerns around the natural environment, and transport, and I'll hand over to our Secretary Audrey van Ryn, who'll speak to those.

Audrey van Ryn:

We were pleased to see that amongst the documents, trees were included in infrastructure, and we've got a section in our 12-page submission that talks about 'definitions' and felt that maybe 'infrastructure' needs to be defined so that everybody knows what we're talking about.

We are concerned that the urban ngahere has been diminished, and we know that Council wants to increase it, but as part of that, it has been suggested individuals can plant their own trees on their property. However, if you have a very large development on a small site, there isn't much room to plant your trees, so I think that needs to be taken into consideration. And in terms of encouraging community groups to use public open space, empty Council land is mentioned for community gardens and we support this. Rather than Council just saying it is a good idea, we think there needs to be a bit more support, such as the Waitematā Local Board supporting Organic Market Garden, who wanted to build an urban farm on the far end of Albert Park, on the northern side of Bowen Avenue, and they we're told that it was just too difficult. But it seems that that sort of thing should be supported, also more planting of fruit trees and nut trees around the city. I know some of it happens. I think there are four eco-neighbourhoods that are doing that, but more of that is useful not only for the tree canopy but also for food for people.

There's a bit in our submission about what I call mini-infrastructure, the pātaka kai, community pantries around the city. There are not many in the central city, but there are ways that the community can support other people who are short of food, plus reducing food waste, because if there's something you don't need to use, you can put it in your pantry for someone else to use.

Moving on to transport, the public transport infrastructure is often criticized but I think we've already got a very good transport network. Thousands of people use it satisfactorily, thousands more, we feel, could use it, with encouragement. In previous submissions, we've talked about the Council having a Public Transport Champion who could tell the good stories about public transport to people who never think of getting on a bus or train or a ferry. People I've spoken to have said, "Well, I couldn't possibly get up the stairs to the bus." That's the way it used to be, but now there's only one step and you can ask the bus driver to make the bus kneel. You probably all know this but many people don't. They don't know how easy it is. They don't know if they walk out their door and down the road, they're likely to find a bus stop and the bus won't take that long. So more encouragement to use it, I think would give people that wider choice of when to use public transport and what is available.

I'd like to make a plug for the City-to-Airport Link, and I have used it back in June. I spent a night with a friend at the Ibis Hotel at the airport and then I took the bus to Puhuni Station. There's a bus every 10 minutes practically every hour of the day. Then caught the train into the city, and that Puhuni Station is a wonderful part of our infrastructure which has recently been done up, so that was a good experience for me which I hadn't known about. It's not very well-advertised at the airport. In fact, I didn't know where to catch the bus. I had to find the bus stop.

Allan Matson:

So, there's a glimpse of what will be in our submission .. the quality compact form - but don't forget about the quality, and even a bit of compulsion as benign dictators wouldn't go amiss.

Councillor Richard Hills:

Thanks for those points ... very clear, and we'll look forward to reading your full submission. I was about to say what many of us, including our Transport and Infrastructure Chair, Councillor Watson, talk about is some of the best spending on infrastructure we could do is promoting the good services we have. But I won't take his turn because I see he's asking a question .. Councillor Watson

Councillor John Watson:

Thank you, Mr. Chair. Allan, a question to you about that quality compact form that you referred to initially in your presentation, and I'm thinking particularly of international examples where it's done well, which you also just referred to at the end there. Do you have any view yourself about what type of height and/or structures retain that human element that you see done so well in a number of the European cities where a lot of buildings are at a certain height? That development is compact and obviously intensive but it retains a human scale. I don't necessarily see that evident in some of the current plans that are getting advanced now. There doesn't seem to be much recognition or thought goes into that. Do you have any comment on that?

Allan Matson:

I recall with the proposed development of the Seafarers Building at Britomart, there was some objection to that and the scale of it. The case advanced was breaking it down architecturally into more human-scaled elements. With good design, that quality should be achievable. It's important that the design outcome is viewed not just from the site but from a number of vantage points so that it is viewed in context. I think one of the big failings perhaps is at ground level where the community have the strongest interface with the building and too often we just see the cheap aluminium joinery and the nasty asphalt going up to it. That's really where there should be additional focus on quality at the planning stage in those buildings,

So as Audrey said, perhaps there is a need for a Public Transport Champion. There has in the past been an Urban Design Champion, and I think there should be a champion in the realm of the built environment. Perhaps Council could once again create the position of City Architect.. Architecture and beauty are not things that come up in planning documents too often. Beauty is a nebulous concept but I want to live in a beautiful city and so do the members of Civic Trust and I dare say so do all the members here. Thank you.

Mr Hill, I would just like to make one point in passing. I should declare an interest by saying that I am on the Waitemata Local Board, but that the board did not make a submission on the Future Development Strategy, and nor did Civic Trust have any interest affected by the FDS.

Councillor Richard Hills:

Yes, thank you, Allan. I wondered if you were going to mention that, but you didn't need to because you were very clearly here on behalf of Civic Trust Auckland, so thank you very much. Thank you both for coming in.