

INITIAL COMMENTS ON THE DRAFT AUCKLAND PLAN

The Urban Design Forum (UDF) applauds the main thrust of the Auckland Plan, and particularly the ongoing commitment to compact, efficient and well-designed patterns of growth and development.

We also support the integration of economic and social issues into the Auckland Plan. The only danger of this holistic approach is that the plan might lose some focus on the spatial and physical aspects of planning and fail to address core issues that held back the implementation of the Regional Growth Strategy over the past two decades.

Section D – Auckland’s High-level Development Strategy

We support the Two Big Initiatives, and in particular the drive to make the city centre a globally attractive destination. Completing the city rail link is an important component of this.

We note that the Southern Initiative Area has expanded enormously from the Discussion Document and is now much more of an inter-governmental social initiative than a physical development initiative based on the airport as the international gateway.

The western initiative has been dropped from the discussion document. The concept in the discussion document seemed to be a rather vague intensification proposal across a swathe of western suburbs. A more supportable approach would be focussed on economic development to achieve a better balance in commuting loads into and across the isthmus. Such an initiative would geographically be centred more on the Northern Growth Corridor and across into the North Harbour and Albany business zones.

In general we support the eight priority areas selected for growth over the first 3 years of the draft Auckland Plan. The puzzling one amongst them is Warkworth – it is surprising that Warkworth has been identified ahead of the investment in highway infrastructure or public transport to support it. If a satellite is needed in the north, then Orewa is a much stronger candidate on the basis of road and public transport infrastructure, population, diversity and community facilities. In fact the whole Orewa/ Silverdale / Dairy Flat area needs major investigation if it is to be a growth area, which seems likely given current pressures.

The suite of tools to bring about the desired change (para 190) does not mention key barriers like the predictability of consenting processes and costs, development contributions, blanket zoning / height limits, car parking requirements, or the risks to centre viability from nearby out-of-centre retailing.

The key barriers mentioned above apply across most of Auckland, and we should aim to relax them more generally though the urban area, where appropriate. While we agree with putting a special focus on prioritised centres, quality intensification should be possible in most areas, because the evidence is that people seeking to live in apartments - whether students, young couples, empty nesters or retirees - often wish to continue living in their own community. To achieve the aims of the Plan, developments that intensify urban activity needs to become normal and widespread in the same way as stand-alone house building is currently practiced by a wide variety of people in all places. While Council may be able to initiate a few admirable demonstration projects, the fundamental barriers to intensive developments must be addressed in order to kick-start a real change.

The major business areas on Map D2 are mainly in the south, which implies an inefficient distribution of commuting trips. Actual, planned, and potential business areas in the north and west need to be identified more extensively.

Chapter 6 – Auckland’s Response to Climate Change

Given the predominance of private car commuting in Auckland one of the major strategies for reducing greenhouse gas emissions (Box 6.2) should be achieving a spatial distribution of employment and residential areas that minimises the distance and inefficiencies of private car commuting and supports more walking and cycling. This is particularly important in relation to Auckland’s geography with its expensive and vulnerable squeeze points connecting the isthmus to the outer sectors.

Chapter 8 - Urban Auckland

As well as supporting the commitment to higher quality design, the Urban Design Forum supports the continued commitment to offering residents more choice of housing types within current urban areas, as well as in expansion areas.

However, we are not convinced that the tools listed in para 491 will be sufficient to achieve either the design quality or the market drive to intensify outside the central area.

More flexible parking standards are mentioned, but we would like to see a clearer recognition of the impact that on-site carparking requirements have on costs, good design and the achievement of intensification. It is no coincidence that the centres with the greatest numbers of new housing consents are those which have no carparking requirement for household units – Newmarket, New Lynn, and above all the central city.

The vibrancy of the urban pocket behind Victoria Park Market is widely attributed to the absence of parking requirements here. By contrast, other areas with a similar built form (largely developed before the car) but lying outside the Central Area are failing to develop because of the required car-parking.

We would also like to see some recognition of the market impact of out-of-centre retailing and office buildings. Many of the so-called business zones in existing District Plans are too open to allowing retail and office buildings in what used to be defined as industrial areas. The result is uncertainty in the development market about the viability of identified centres and an understandable reluctance to invest. This is evident not only in centres like Panmure that have gone backwards, but in new major centres like Albany, where public investment has not been matched by the private sector because of cheaper options in nearby “business” zones. Out-of-centre retailing also poses a threat to the future viability of apparently very healthy successful centres like Mairangi Bay and Pukekohe

The predictability of consent processes and costs (notification, development contributions) is also a major issue for developers of intensive housing. It is one reason that many developers do not even attempt intensive housing and continue to assert that the market wants large detached houses, when that is clearly out of step with demographic trends.

The UDF supports the compact city and the concept of a Rural Urban Boundary. We believe that the most effective way of holding such a line is to develop a vision with the community for the value and role of the adjacent rural land, in other words to focus on strong supportable rural zonings to help justify the position of the RUB.

It is difficult to comment on Maps 8.2 and 8.3 without having a more detailed explanation of what these centre classifications mean, what is their purpose, and what actions might result from them.

What is the intended role of Metropolitan centres ? How do centres as different as Newmarket, Sylvia Park and Papakura fit into this role ? How were the numbers of metropolitan centres arrived at ? To what extent do they represent potential rather than actual roles ? What would actually be done in these centres compared to town centres or the city centre ?

Similarly, how were the “Regeneration” centres distinguished from “Market Attractive” ones ? And why are so many centres “Not Classified” ? What would the classification mean exactly in terms of the Council’s actions ?

The UDF supports the importance of design-led development as described in Priority 3. Good urban design is essential to successful intensification and to attract people to live in mixed-use town centres where they can carry out much of their daily business without needing to use a car.

“Low Impact Design” (Box 8.5) focuses on stormwater. Extensive use of swales and permeable surface requirements need to be balanced against the energy and carbon saving values of intensive development.

The focus on the design of development in suburban neighbourhoods (para 530, Figures 8.5-8.8) is reliant on the amalgamation of lots. In practice most intensification occurs on single standard lots, and the results are destructive to the suburban environment and counter-productive to community acceptance. More of the intensification load may need to be focussed on town centres where a greater payoff can be achieved in terms of sustainability traffic reduction and lifestyle choice.

The UDF supports the visionary nature of the City Centre Masterplan and the big moves proposed in it. There is concern around how soon some of the moves could be achieved in terms of funding and the adaptability of the traffic network, so we urge the need for simple, low-cost incremental improvements to build momentum towards an ever-improving town centre.

While there are many things to be improved, the City Centre needs to be acknowledged as a Growth Strategy success story, with more 20,000 residents and the transformation of street life that has occurred over the last two decades. The Wynyard Quarter is the most recent example to generate public enthusiasm for good urban design.

Schedule 1 (p131) defines the centres hierarchy in more detail. The definition of metropolitan centres and the key attributes listed in Table 8.3 stress a diversity of activities and community facilities that places like Sylvia Park and Westgate do not yet have. It is surprising that such potential future centres are given precedence over existing more diverse centres like Henderson or Botany. The confusion between potential intensification and the existing roles of strong centres does not bode well for the development of effective targeted implementation tools.

More specific work needs to be done on the attributes of the centres (whether classified by hierarchy or intervention) and what the implications of those attributes might be for transformation projects, area spatial plans and above all the Unitary Plan.

Chapter 9 - Auckland's Housing

In considering the affordability of housing Council needs to consider the impacts of two relatively recent changes to the regulatory regime and whether they are justified and/or set at the correct levels. These are the determination of development contributions and the use of minimum apartment sizes as a rather blunt instrument to achieve good design outcomes.

Chapter 11 – Auckland's Transport

We support the principles outlined in the strategy for Auckland's transport, and the need for it to be integrated with and serving urban form. Transport infrastructure requires enormous sums of money, but this is totally overshadowed by the value of urban property that it serves.

We agree with the emphasis put on the city rail link. The rail system will always be inefficient and vulnerable while it effectively ends in a cul-de-sac.

There is insufficient emphasis on the bus network as the primary mover of the majority of public transport users, both now and into the future. As the rail network is improved, the bus network needs a complete redesign to become a time-coordinated feeder system to rail and ferry. An outcome of this should be a legible bus network that facilitates easy and free transfers between routes, allowing a

frequent service to a wide variety of destinations, not just the centre. This would replace the long, destination-based routes we have at present, many of which compete with rail routes, and which make cross-town travel exceptionally difficult.

We wonder whether the cross-harbour tunnel would provide more efficient connections, particularly for freight and public transport movements, if it emerged on the Port/Grafton Gully side of the central motorway loom.

Given that there was virtually no capital investment in public transport for more than half a century, it is disappointing that the planned investment in roading projects still far outweighs public transport investment. The plans for new roads, particularly those leading out of the urban area (such as Puhoi to Wellsford) seriously undermine the Plan's principle objective of compact urban form. They amount to a subsidy for suburban expansion, when what is required is a subsidy for better urban housing.

In considering funding mechanisms, it needs to be remembered that private car transport is heavily subsidised by the use of rates to fund congestion and safety improvements, free public and on-site parking provision, etc

A variation of congestion charging that might be considered is free-flow charging, by which motorway users would be charged variably to guarantee free flow, and would not pay outside commuter hours or if they suffered congestion

Chapter 12 - Implementation Framework

At a high level, the draft plan places urban design in a central role in the future of urban Auckland. This recognition of the importance of urban design is a step forward from previous strategies.

However, to help support quality urban environments, Chapter 12 largely repeats material that was set out in the 1999 Regional Growth Strategy - aligning the work of the council, seeking agreement with central Government, finding new sources of funding and undertaking area-based planning. Few of these tools have come into play in any meaningful way over the past 10 years, yet there is a reliance on the same set of tools. If there are no new tools or rules, are we to be stuck in the same loop?

There is great reliance on the RUB (rural urban boundary) to implement the compact city. However experience to date indicates that urban redevelopment and associated compact living options need to be "demand-led", they can't be forced upon people and households - if they are, they are seen as a poor second choice. That is, the strategy needs to support and enable the natural market for intensification and urban redevelopment if the strategy is to be successful in achieving the scale of change foreseen.

Rather than focus on a RUB, the Strategy needs to focus on allowing for urban redevelopment to occur in a more "natural" way, and how this can occur in a less forced way.

The strategy is light on the tools needed for the centre/suburb/neighbourhood level planning exercises required to facilitate the scale of change implied by the 75/25% urban rural split and how a natural (and understandable but ultimately very costly to society) NIMBY response is to be managed and accommodated.

There is no time between now and the Unitary Plan being finalised for this neighbourhood level planning to occur, yet the Unitary Plan will become the battle ground upon which some certainty over the future of neighbourhoods and centres will be determined. Experience indicates that the Unitary Plan will have a life of 20 years at least (including up to 5 years preparation and finalisation through the Environment Court process, 10 years of operation and a further 5 years "limping on" before the first review comes into effect). In other words the Unitary Plan needs to set out the framework for the next 20 years of growth, yet there is no way that this framework can be set in the time available, based on the current contents of the Auckland Plan.

An incremental, suburb-by-suburb approach to planning and redevelopment spread over the next 10 years is likely to fall foul of the problem that the council encountered in the implementation of the Regional Growth Strategy - as time progresses from when the strategy was prepared, commitment wanes and uncertainties increase.

At the development level, a major focus has to be on skills for council reporting planners and Hearing Commissioners - these are the two key "gatekeepers" in the development control / RMA process.

These two key players need to have the discretion available to them to appropriately exercise design changes. This will require a major overhaul of the district (unitary) plan. This plan cannot be a simplified statement of outcomes and principles.

The tools suggested to ensure a high quality urban environment results are fairly basic, draw on overseas experience where there is often a very different legislative environment, or do not go beyond what is currently available.

Perhaps the most important breakthrough would be to recognise the impediments to quality intensification buried in our current district plans (blanket zoning / height restrictions, unpredictable consenting processes, poorly targeted development contributions, minimum carparking requirements, and the risk from cheaper car-oriented development in "business" areas), and then ensure that the Unitary Plan addresses these issues effectively across all of the urban area.