



6 May 2022

Submission on 'Virtual Have Your Say' Event

Thank you for the opportunity to present the views of the Mission Bay Kohimarama Residents Association.

Firstly, let me say that we do understand that the Council's planning changes are being driven by central government, that the legislation has already been passed, and that there is therefore little potential for fundamental changes to address the very serious flaws in the plan.

Nevertheless, we do have major concerns, so I would like to start by laying those out, and then addressing what we would like Council to do to address these, even if your hands are tied to a large extent.

Issues

1. **Elimination of low and medium density zones.** The new zoning maps show that the Council is proposing to change all current residential zones throughout Auckland to high density zones allowing unlimited numbers of apartments to be built to either 4 stories (modified mixed housing urban zone MHU) or 6 stories or more (townhouse and apartment building zone THAB).
 - This covers virtually all of Auckland except for rural fringe areas. From Manurewa to Long Bay, virtually all residential land will be zoned for 4 storey apartments or greater with only very minor areas zoned for 2 stories or less (less than 5%).
 - Almost ALL of Mission Bay and Kohimarama (except small pockets mainly around Sage Road will be zoned to allow unlimited numbers of dwellings of 4 storeys or more.
 - In the longer term, Auckland will have no suburban landscapes. Every suburb will be dotted with 4 storey apartments, and any 2 storey housing will likely be surrounded by apartments. Eventually, every suburb will essentially look the same, with no remaining individual character.
2. **No resource consents required.** These developments can proceed as of right; no resource consents are required and so there is no opportunity for local residents to object or even be informed.
 - While resource consents are required where a developer wants to build beyond what the rules allow as of right, historically Auckland Council has not required consents to be notified unless the rules are substantially breached. That means

that even a proposal to build higher than the 12m allowed in the MHU zone might not be notified and so local residents might still not have any ability to object.

3. Special character lost. Most areas throughout Auckland, and nearly ALL areas in Mission Bay and Kohimarama previously identified as having special character will no longer be protected. These areas can also have unlimited numbers of dwellings of up to 4 storeys.
 - The government and Council seem to believe that Mission Bay and Kohimarama have no character worth preserving, despite these suburbs being held up as some of the oldest and most desirable suburbs in Auckland.
4. Auckland Council is going further than the government requires. The government has decreed that up to 3 dwellings of up to 3 storeys must be allowed on most residential land. The Council, however, in implementing these changes is choosing to extend this to allow unlimited dwellings of up to 4 storeys. This will take densities from 1 dwelling per 300m², 400m² or 600m² (depending on the old zone) to 1 dwelling per 50-80 m².
5. The existing Unitary Plan must be reviewed by 2025 anyway, so why the rush to make unresearched and unconsulted changes now. The Council could choose to do the bare minimum to comply with the government's requirements, but is choosing to go much further with minimal public consultation.
6. Zoning decisions made today should not be knee-jerk reactions. They will determine Auckland's liveability for ever and cannot be undone even if it is later determined that they were bad decisions. We owe it to future generations to consider not only the short term issues, but also the long term impact these decisions will have on the development of the city.
 - The Unitary Plan took years and extensive consultation to determine which areas were best suited to high density, which areas were more appropriate for medium or low density, and which areas had sufficient special character to warrant preservation.
 - Now a combination of Wellington politicians and a panicked Auckland Council want to throw that out and replace everything with a one-size-fits-all approach to all of Auckland.
7. The Housing Crisis is not driven by a land shortage, but by a shortage of financial, professional and trade capacity to plan, design, finance and build new homes. Making more land available will not magically create more builders. It will simply drive up demand for resources already in short supply and increase inflation.
8. There is no urgency to make more land available. The Unitary Plan zoning enabled land for an additional 900,000 dwellings that would accommodate more than 2M more people. At the time this was deemed sufficient for Auckland's long-term needs. The new plan apparently enables a further 1.8M new dwellings, sufficient to accommodate a further 4M people.
 - So we are overriding existing democratic processes to rush through legislation and zoning changes to urgently create accommodation for a population of 6M more people.

- The department of Statistics has estimated that Auckland's population could increase by 300,000 (low growth) to 900,000 (high growth) by 2046.
 - It is patently obvious that there would be little impact from deferring these decisions until the required Unitary Plan review in 2025, to allow potential changes to be properly researched.
9. No consideration of infrastructure limitations. The new zones are applied as a blanket across Auckland regardless of whether the existing sewage, water, storm water or electrical capacity exists. We all know that many areas suffer from regular sewage overflows; dramatically increasing the population in such areas will inevitably result in more environmental problems.
- Further, the government is separately pushing through the 3 Waters legislation which will result in Auckland having a minority position which will leave them unable to determine the priority for water projects. So we won't be able to stop development in an area which has inadequate sewage capacity and we will also be unable to prioritise improvement of those systems.
10. No consideration of roading efficiency. The combination of greater density and the separate government decree preventing any off-street parking requirements means that our roads will become clogged with parked cars with further losses of productivity.

That is a summary of our major concerns.

So what do we want Council to do about it?

1. Ensure that changes made to the Unitary Plan are the minimum required to meet the legislation. The legislation will create bad outcomes for Auckland; there is no need for the Council to compound this by going beyond what is required.
 - Don't allow unlimited numbers of dwellings on a site rather than the 3 required by law
 - Take a more liberal view of which special character areas meet the definition of 'qualifying matters'.
 - Don't apply walkable catchment rules allowing 6 stories around local centres or other locations not required by the NPS-UD
 - Don't upzone areas that already meet the law, for example upzoning MHU to THAB unless clearly required.
 - Walkable catchment criteria should reflect real-world practicalities. While the young and fit may be able to routinely walk 1.2 km or 800m to catch a bus or train, large segments of the community would be unable to. Why would you choose to discriminate against the elderly and disabled?
2. Lobby government for improvements to the legislation or enabling regulations to allow more practical solutions:

- Expand the exemptions to include not only heritage buildings, but areas of specific character (both architectural or landscape) worth preserving. These areas as defined in the Unitary Plan contribute only a few thousand of the 1.8M new dwellings enabled by the new legislation and will have no measurable effect on the outcome, so why destroy Auckland's character for no discernible benefit?
 - Ensure that the definition of special character or qualifying matters apply to areas, not just site-specific character. For example, the collection of 11 'arts and crafts' houses near the corner of Selwyn Ave and Ronaki Road collectively create a special character zone, even though any single home probably does not warrant protection.
3. Request the government to provide a time extension for implementation of at least the more contentious components until the next Unitary Plan review in 2025.
- This would allow time for research and consultation to achieve an overall better outcome, while having negligible impact on the number of dwellings constructed.
 - Given that resource consents are already being issued at a rate faster than the construction industry can build, there is no logical basis for excluding taking an additional 3 years or so to carefully consider the outcomes and potential unintended consequences.

Final thought

Don't panic! It took years of research, planning, drafting and consultation to agree on the Unitary Plan, and significant parts of that plan are still being found to be not fit for purpose. Why would we think that a knee-jerk reaction to a housing crisis by Wellington politicians that forgoes research and consultation in favour of short-term expediency would provide a better pathway for Auckland's long-term development? Just implement the obvious things now, and defer the rest until the Unitary Plan review in 2025.

Yours sincerely



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