



New Zealand
Planning Institute[®]
Te Kokiringa Taumata

Submission on Auckland Unleashed- The Auckland Plan Discussion Document

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Introduction

The New Zealand Planning Institute (NZPI) takes this opportunity to make a submission on Auckland Unleashed - The Auckland Plan Discussion Document (the Plan).

In responding to the Plan, NZPI notes that its content is quite properly aspirational in tone and reflective of a number of legacy strategies and plans developed under Auckland's former regional council and territorial authorities.

NZPI supports the strong economic and social focus of the Plan and its overall notional vision to make Auckland "The world's most liveable city". NZPI also supports the nine broad objectives underpinning that vision. NZPI recognises that the Plan is very much in its infancy and has therefore confined its feedback in large part to the strategic issues surrounding the plan such as legislative weight, funding, timing, priorities, consistency of language, alignment and measurement. NZPI acknowledges that the Plan is being developed within tight timeframes, and within the legislation set out in the Auckland Local Government (Auckland Council) Amendment Act 2010.

NZPI thanks the Auckland Council for this opportunity to provide feedback on the discussion document and wishes to assure the Council of its continued interest in and commitment to further comment on the Plan as it evolves.

About New Zealand Planning Institute (NZPI)

Established in 1949, NZPI is the professional organisation representing planners, resource managers, urban designers, and environmental practitioners throughout New Zealand. NZPI's raison d'être is to provide learning, support, knowledge, and advocacy for planning professionals within New Zealand. NZPI membership is broad, and individuals within our organisation have a varied range of opinions and experiences which help to inform this submission.

NZPI's submission on the Plan draws on the experience of NZPI members together with input from the National Executive and senior Councillors.

NZPI's Interest in the Auckland Plan

NZPI has a significant interest in the ongoing development and outcome of the Plan. That interest is based on a number of considerations:

- 1) By far the largest concentration of NZPI members live and work in Auckland and all of these members will in some way be affected by the priorities and decisions set out in the Plan. Indeed, many NZPI members work either within Auckland Council or its Council Controlled Organisations, and will be responsible for developing or delivering aspects of the Plan.

- 2) NZPI also has a significant interest in how the Plan will be used as a tool to integrate land use, transport, economic development, environmental management and infrastructure development to achieve long-term and measurable outcomes.
- 3) Finally, given that central government has signalled its interest in applying spatial planning as a tool beyond the Auckland region. The development and implementation of the Plan will potentially become a model for planning throughout New Zealand and therefore impact on all aspects of planning and the planning profession.

With this in mind, this submission seeks to respond to the key ideas put forward in the high level areas of focus in the discussion document. NZPI notes that as this is a discussion document and not a completed plan, the content is primarily comprised of existing information and evidence. As such, much of the information in the discussion document reflects the existing strategies and plans developed under Auckland's former regional council and 7 territorial authorities.

While this means that much of the previous work done across Auckland is included in the Auckland Plan, particularly given current LTCCPs and other funding is committed to numerous projects and programmes across the region, NZPI anticipates that as a new entity, Auckland Council will have an ongoing opportunity to align its priorities and goals over time. NZPI therefore looks forward to ongoing engagement with Auckland Council, and in particular regarding the draft Auckland Plan anticipated for release in August 2011.

The following submission reflects the above interests.

Specific comments regarding the Auckland Plan

The Plan is seen by Auckland Council and Central Government as an opportunity and appropriate tool to transform the Auckland region in accordance with evidence based, best practice planning. The Plan represents a paradigm shift from land-use planning to spatially integrative planning and an opportunity for Auckland Council, as a newly formed entity with a new governance structure, to develop its strategic direction and address its specific visions and goals.

As a general comment, NZPI believes it would be appropriate to add a further broad objective and related measure to the Plan, that being the ongoing "efficient and effective government of the Auckland region". This is typically included in similar strategies within the United Kingdom.

The spatial planning legislation also requires Auckland Council, through the spatial plan, to clearly set out the role for Auckland in New Zealand. Planning decisions and funding allocation will inevitably have a significant impact on Auckland's neighbouring regions Northland and Waikato, and the rest of New Zealand. To plan spatially, the Plan needs to consider Auckland's role at multiple spatial levels, considering both urban and rural environments. It will also be important to recognise and take advantage of Auckland's unique

quality and what it and the wider region have to offer in how Auckland Council plans spatially for the region.

NZPI believes that the Plan needs to clearly demonstrate how it aligns with other regions' plans, and in doing so give greater consideration to neighbouring regions' existing plans and strategies. Additionally, the Plan needs to align with national plans and legislation, ranging from the National infrastructure Plan to National Policy Statements, and clearly outline where alignment of strategic direction is both complementary and competing.

The vision and approach also needs to be made clear particularly in respect of future infrastructure priorities, land use management and classification, and mechanisms for environmental protection. In its current form, the discussion document treats these issues in what appears to have a disconnected or siloed approach. An example of this is the discussion document's introduction to a new framework for the classification of town centres without clear methodological support or analysis. It similarly discusses in some significant detail how infrastructure would be re-shaped. It is unclear, however, how this potential re-classification is aligned or connected with the identified top spatial priorities for Auckland.

As the Plan is intended as the foundation for implementation of a future Auckland, it is important that the process for further consultation, decision-making and implementation is clearly outlined. This includes ensuring transparency in the role of all aspects of the governing body including Local Boards and Panels.

NZPI believes that developing the first Auckland Plan, and spatial planning, needs to be an iterative process. This discussion document is only the first step in that process. NZPI believes that Auckland Council's intention to develop the Plan based on public feedback is a good start, and one way to achieve its aspiration for a liveable city. NZPI encourages Auckland Council building on existing initiatives and work, and looking at ways to engage with its stakeholders.

Priorities within the Auckland Plan

The Plan is intent on identifying, agreeing and delivering the long-term social, economic, environmental and cultural objectives for Auckland and its communities through specific priorities.

The possible top spatial priorities proposed within the Plan include three areas that are considered key to economic growth within the Auckland Region:

- a) International City Centre connecting all of Auckland through an exemplar network of rail, ferries, avenues and roads.
- b) Southern Opportunity Area; centred on the airport and Manukau Harbour, a location for high value manufacturing, population "diversity" and residential growth, and

- c) North Western Opportunity Area; encompassing Albany and across to the west, to the foot of the Waitakere Ranges, a hub for marine and film industries and a model of new ways of undertaking public-private partnerships (*PPPs*) to improve housing supply options.

NZPI notes the proposed economic growth zones and Council's intention to include measures, timelines and funding for delivery of the above growth zones in its next iteration of Plan. In NZPI's view the inclusion of these delivery details will be vital to the success of the Plan. Additionally, there is a lack of attention given to growth areas such as the knowledge economy and health sector, and other relevant sectors. The Plan needs to demonstrate where the provision for, and commitment to development of these economies needs to be addressed.

The notional vision to make Auckland "The world's most liveable city" is noble and NZPI also supports, in theory, the following nine broad objectives underpinning that vision:

- An Auckland that puts children and young people first
- An outward looking global city with a productive, high value economy, supported by a world class international city centre
- An Auckland that acknowledges and acts on the special place of Mana Whenua
- A place of diverse, dynamic, safe, secure and accessible communities
- An Auckland that provides a sustainable lifestyle with high and rising quality of life for all Aucklanders
- An open, welcoming place that is attractive to investors, skilled workers and tourists and which encourages international events
- A destination recognised world-wide for its pre – eminent rural, natural and marine setting
- A place enabled by world-class infrastructure and supporting services
- A beautiful Auckland that everyone is proud of.

These objectives, however, lack clear direction and somewhat generically attempt to achieve a range of aspirations. There is also a lack of evidence illustrating how Auckland Council intends to achieve them. By trying to do everything, but with no clarity regarding what tools and mechanisms will be used, Auckland Council risks spreading its resources too thin, and promising much but and achieving little. NZPI acknowledges that there will be competing demands for limited resources, and believes that Auckland Council will need to identify prioritised projects and programmes early on.

Other priorities within the Plan are centred on the following themes:

- People and Quality of Life
- People and Economy
- People and Environment
- People and Place
- People and Infrastructure

NZPI supports Auckland Council on its decision to put people first both in the Plan. By framing the document structure around the role of people and their relationship with Auckland in the six key sections, the Plan is better able to consider and meet its requirements under the Local Government Act to promote the four well-beings, i.e. environmental, economic, social and cultural.

NZPI is concerned, however, that there is no setting of priorities for spending and future allocation of land use resources, including using existing zoning provisions. Critical issues such as how Auckland Council, via the Plan, address 60% of national growth in the next 30 years need to be explained, and clear picture on this provided and articulated to the public.

NZPI agrees with the discussion document that climate change pressure and the need to reduce greenhouse gas emissions are likely to have an important influence on energy, infrastructure and energy use. The issue of sea levels rising will also impact on coastal planning and land zoning and needs to be addressed in the Plan. NZPI would like to see Auckland Council's clear commitment to addressing such environmental issues, and the methodology for doing so in the Plan. NZPI supports setting clear environmental targets as the discussion begins to do, but believes the targets set out thus far may unrealistic or unachievable and will require further investigation.

Current Commitments and Existing Funding

The discussion document recognises the need for innovative funding models including tolls, user charges and public/private partnerships. Given the recent events in Christchurch and changes in Central Government priorities NZPI supports this flexible approach. NZPI also encourages Auckland Council to follow best practice by empowering the strategy to drive the budget rather than allowing the budget to drive the strategy.

The discussion document includes a mix of existing conditions, future visioning and proposed future planning and analysis. It is therefore confusing how previous planning strategies on local and regional levels have been taken into consideration. NZPI would like to see clear information regarding where funding on a regional and national level has been allocated to projects aligned with previous planning strategies such as the Auckland Regional Growth Strategies.

In particular, without central government aligned funding many of the proposed projects or planning directions in the Plan will not be achievable. Given Auckland projects and inter-regional projects are often largely funded by central government, funding certainty will be critical. Information regarding current funding streams and funding allocation through LTCCPs, which will now be part of the Long Term Plan, is necessary, as this will impact on future funding from central government, Auckland Council, and other public and private agencies.

Plans and Legislative Context

NZPI is concerned at the lack of clarity around the statutory status of the Plan and believes that without that clarity and legislative underpinning the spatial plan will be severely compromised. While the Plan states that other statutory plans must have particular regard to the spatial plan and spatial imperatives for all of Auckland, it needs to be clear exactly how this will work.

It is very concerning that there is no clarity around how the Auckland Plan will relate to the Resource Management Act (RMA) and the Plan's apparent failure linked to the RMA. There are a host of proposed policy directions within the discussion document that have potential implications on how the RMA is employed on a case-by-case development-by-development basis. It needs to be clarified what weight the Plan will have in RMA decision making process, its alignment with the Unitary Plan, and the role of the appeal rights on the Plan.

Equally, the Plan's relationship or hierarchy with other statutory documents such as the Government Policy Statement, National Policy Statements, National Environmental Standards must be given a framework and rationalised. There are a number of issues to be considered ranging from how Council will align its many plans such as the Long Term Plan, Unitary Plan, and local place based plans will give "particular regard" to the Auckland Plan or to how projects in these plans will be funded. It is wise for Council to look at using a range of tools available within existing legislation, but to also seek alternative and innovative funding and financing tools to meet its intended objectives. However, this can only be initiated once it is clear how Council's many plans come together.

Timing

Auckland Council's timeframe to complete the Plan appears ambitious given the significant impact of the plan on the future of Auckland. While NZPI recognises that the 20-30 year time horizon has not been Council's decision, but rather has been set out in the spatial planning legislation, Auckland Council needs to identify and discuss the trade off between "doing it right" and "doing it quick" as part of the engagement process. More thought also needs to be given to how other key planning documents such as the Long Term Plan and Unitary Plan.

Furthermore, given the spatial plan's 20-30 year time horizon, which is less than the RMA requires for its plans, and the Building Act's 50 year horizon arguably some of the goals outlined in the Plan could be achieved under the RMA.

Consistency of Language

NZPI believes that the Plan needs to clearly distinguish which spatial geographic levels it is referring to and adopts a consistent language throughout. The Plan will need to have a strong focus on place and geographic aspect to Auckland Council's strategic direction. It is therefore critical that the Plan identifies what places it refers to. Currently, the discussion document refers to Auckland, Auckland region, Auckland city, and Auckland city-region interchangeably. Consistent language and terms will give clarity to planners and other

professionals involved in implementing the Plan and related plans, and avoid potentially confusing and costly legal action. Consistency in overall language and place names will help to avoid confusion, and provide the public with greater opportunities to engage with Auckland Council in developing the Plan.

Implementation, Monitoring and Review

The implementation, monitoring and review section of the discussion document is severely lacking. In the past fragmented governance has been one of many reasons for poor implementation plans across Auckland. Auckland Council's new governance structure should leave behind many of the barriers faced by previous decision makers, but implementation is a key part of successful planning. NZPI would like to see a clear proposal and methodology for how Auckland Council's intends to link aspiration to delivery in the Auckland Plan, and how the Plan's visions and goals will be delivered as outcomes within its existing legislative planning framework. Implementation of the Plan must then have a robust monitoring and review process to determine whether the Plan is meeting its intended objectives.

The Process

Spatial planning signifies a notionally new approach to planning in New Zealand. As such, Auckland Council has the opportunity to introduce and provide clarity around best planning practice. To do so, the approach employed should be clearly outlined and discussed.

NZPI recommends that the following areas be clearly outlined in the next iteration of the Plan:

1. Methodology and process that will be followed
2. Acknowledgement of previous planning documents and decisions
3. How the Plan will be reviewed, measured and monitored
4. How the Plan will be funded

Contact

Should you have any queries regarding the above submission content, please contact Christina Kaiser, Senior Policy Advisor by email: christina.kaiser@planning.org.nz, or telephone: 09 520 6277 ext. 4.

Yours faithfully,



Susan Houston CEO