

MANAGING THE REGION'S DEVELOPMENT  
- OUR FUTURE DEPENDS ON IT



**LOCAL GOVERNMENT (AUCKLAND)  
AMENDMENT ACT 2004  
RESOURCE MANAGEMENT ACT 1991**

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**KEY ISSUES  
RECOMMENDATION REPORT  
OF THE  
JOINT HEARINGS PANEL**



**SECTION 4**

**TO ALL REPORTS**

All Auckland councils have adopted this Key Issues Report and it forms part of their decisions. No changes have been made to the 28 May 2007 version of this report.

**31 July 2007**

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## INTRODUCTION

The following is a summary report of the key issues raised in evidence and submissions during the course of the hearings held in accordance with the Local Government (Auckland) Amendment Act 2004 (“the LGAAA”); and therefore matters for consideration by the Joint Regional Policy Statement and District Plan Changes Hearings Panel (“the Panel”).

## OVERVIEW

The LGAAA requires all councils in the Auckland Region to make land use and transport changes to the planning documents to give effect to the Growth Concept contained within the Auckland Regional Growth Strategy (“RGS”) and contribute, in an integrated manner, to the matters specified in Schedule 5 of the Act (s39 & s40 LGAAA).

The matters referred to in Schedule 5 support the purpose of the Resource Management Act 1991 (“RMA”) in promoting the sustainable management of natural and physical resources. This includes facilitating integrated transport management and a multimodal transport network; ensuring land use and transport patterns are aligned, reducing the adverse effects and increasing the positive interactions of transport and land use; and supporting compact sustainable urban form and sustainable urban land use intensification.

The Growth Concept contained within the RGS seeks to increase housing and employment densities in selected areas while maximising access to existing and future public transport. The Growth Concept is based around a compact urban form. Key features include:

- Future urban growth is within the existing Metropolitan Urban Limit (“MUL”), with limited provision for urban development outside the MUL
- Urban growth is focussed around centres and corridors
- Some urban growth will be accommodated in Future Urban Areas
- Growth in rural areas will be focussed on rural and coastal settlements
- Urban development will be avoided in the most highly valued and sensitive natural areas

An important transport issue in this context is providing an urban form that supports the public transport network and/or makes more efficient use of the transport system.

A key element in the LGAAA is the requirement for “integration”. Integration is required within each of the planning instruments, and across all planning documents in the Auckland Region. This integration has both a vertical and horizontal aspect to it, insofar as all District Plans must be consistent with the Regional Policy Statement (“RPS”) and with each other.

Overall, the suite of plan changes notified by local authorities under the LGAAA process provides a strong policy framework for urban containment. Urban containment makes use of a policy approach that has been used in the Auckland region since the 1950s, and has been reconfirmed through prior RMA processes. A strong framework is required to manage significant and ongoing growth pressures, and to provide a regionally integrated approach to both urban and rural development. While over 50% of growth in the region is currently within existing urban areas, there also needs to be a clear process for enabling necessary extensions to the urban area through movement of the MUL and extensions to rural and coastal settlements. Effective boundaries are an essential component of urban extensions and the long term integrity of the MUL.

## KEY ISSUES OF CONSIDERATION

### **4.1 GROWTH AND DEVELOPMENT**

#### **4.1.1 The Growth Concept, Land Use and Transport, and the MUL**

##### ***Issue***

The MUL is integral to the Growth Concept and to the integration of land use and transport. Evidence was presented for and against the effectiveness of the MUL as a key policy tool to manage growth in the Auckland region.

In relation to integration of land use and transport, evidence was presented that employment self-sufficiency can have positive effects on regional transport efficiency.

##### ***Recommended policy direction***

- Retain the MUL in the RPS as a key policy tool supporting the Growth Concept in the Auckland region.
- Retain provisions in the RPS that are explicit regarding the manner in which extensions to the MUL can be considered.
- Retain the emphasis on high density centres and corridors as a key mechanism for implementing the Growth Concept.
- Sector-based employment self-sufficiency should be promoted.

##### ***Reasons***

The MUL and high density centres and corridors are fundamental components of the Growth Concept contained within the RGS. Without these components, it is unlikely that integration of land use and transport could be realistically achieved within the Auckland region.

The weight of evidence presented did not challenge the fundamental premise that the MUL is integral to the Growth Concept.

More compact urban forms have significant advantages when compared to lower density forms of development. Low density development within much of the Auckland region urban area, combined with dependence on the car as the primary means of transport has resulted in growing transport congestion and decreasing air and water quality, while threatening the amenity and liveability of urban areas. This could also result in a less economically competitive city. Well located and designed higher density areas support passenger transport and alternative modes of transport to private vehicle usage.

The supply of business land is an important consideration in managing urban areas. However, this by itself will not justify continued outward growth of the metropolitan area, as there are also other important economic, social, cultural and environmental matters to be considered.

The Growth Concept promotes compact mixed use environments that support residential and employment activities. Promotion of local employment self-sufficiency can result in a

reduction in the need to travel. One of the indicators of successful implementation of the Growth Concept will be a reduction in overall vehicle trips.

#### **4.1.2 Specific Requests for MUL Movement**

##### ***Issue***

The LGAAA provides for the Panel to consider and recommend changes to the MUL – subject to an ARC right of veto. The Panel heard a number of such requests for extension of the MUL. The requests varied considerably in scope and level of detail submitted in support. Evidence was also presented with respect to the definition of MUL boundaries and the criteria used to determine their location both around the regional urban edge and around rural and coastal settlements.

Within the LGAAA process there is one major request to shift the MUL (Hobsonville Village / Hobsonville Airbase / Massey North). This request is covered in Reports ARC 8, WCC 8A, WCC 8B, WCC 8C and WCC 9, and is therefore not dealt with in any further detail in this key issues report.

##### ***Recommended policy direction***

- Site-specific requests for MUL shifts, submitted without a sufficient and comprehensive application, should not be considered through this process. Such requests should be referred directly to the relevant TA for further consideration.
- The MUL should be moved in the following areas: Hobsonville Village (including the land subject to submission 205/1 - Fulton Hogan); Hobsonville Airbase; and Massey North (as detailed in the maps attached to Recommendation Report ARC 8)

##### ***Reasons***

The LGAAA provides no special procedure for the consideration of changes to the MUL – this is an RPS policy. Accordingly, the Panel recognises the appropriateness of the normal RMA requirements for such requests, which should be from a territorial authority with appropriate supporting documentation. The Panel was prepared to depart from this procedure in the event that it received a sufficient and comprehensive submission. The majority of requests did not provide sufficient supporting information. The Panel resolved to refer all such requests to the relevant territorial authority for further consideration.

The RPS contains provisions and considerations for dealing with MUL shift requests. The site-specific shift proposals declined by the Panel had not been sufficiently tested against the relevant criteria of the RPS, or did not address timing issues arising from the Growth Concept contained within the RGS. Until such time as this analysis has been undertaken, it would be inappropriate to accept such requests.

The Panel determined that sufficient information was provided in respect of the MUL shift proposals in the following areas: Hobsonville Village (including the land subject to submission 205/1 - Fulton Hogan), Hobsonville Airbase and Massey North (as discussed in Recommendation Reports ARC 8, WCC 8A, WCC 8B and WCC 8C).

### **4.1.3 Effects of MUL on Housing Affordability**

#### **Issue**

Evidence was presented for and against the proposition that lack of flexibility in the MUL policy is forcing up the price of land and houses by limiting the supply of land to the point that it is becoming unaffordable.

#### **Recommended policy direction**

- RPS Change 6 should be retained as amended.

#### **Reasons**

RPS Change 6 sets out a process for monitoring the affordability of housing and, where necessary, advocating for greater provision.

The Panel has been advised that the debate surrounding housing affordability is being considered in the wider context of the review of the RGS. The RGS identifies a five year review process. The Long Term Sustainability Framework (LTSF) also considers long term housing affordability issues.

The MUL and high density centres and corridors are a fundamental component of the Growth Concept contained within the RGS. The Growth Concept is not under review through this LGAAA process.

Supporters of the proposition that lack of flexibility in the MUL is forcing up the price of land and houses gave evidence that, among other things:

- Entry-level housing prices are determined primarily by the cost of land;
- Raw land price is exacerbated by constraints to supply;
- The MUL is causing distributional inequities – i.e. the price of land is being “lifted” differently in different parts of the region;
- Significant areas of land identified for residential use within the MUL are not presently available and may not be practical to develop;
- A corollary of higher housing land prices is that higher land prices make conversion for large land requiring business activities uneconomic;
- There is a crisis in the supply of land available within the MUL for development for a variety of purposes – residential, commercial and business.

Supporters of the alternate proposition gave evidence that, among other things:

- While the MUL has an effect through restraint on supply, it is the *supply* of dwellings rather than the supply of land that is the key price determinant for housing.
- There is no evidence for a lack of affordable dwellings – only that dwellings on “traditionally” sized sections are becoming less affordable.
- While intensification results in higher land values per hectare, higher densities result in lower land value per residential unit. The policy of housing intensification (e.g. apartments and townhouses) actually reduces price of land per lot;
- Controls are necessary to encourage intensification to the point where it is sustainable;

- Housing affordability is about the overall cost of entry, not just the land portion. In particular it involves demand and supply factors, tax and interest rates, and amenity values.
- Intensification and accessibility of employment opportunities provides agglomeration benefits in terms of higher incomes and productivity – in turn making housing more affordable.

There is a process to enable movement of the MUL thereby releasing some greenfield land for residential development. However, it does not follow that unlimited land supply will result in more affordable housing. The Panel considers that there are a wider range of supply and other factors involved than the MUL. Intensification provides more dwellings at lower per unit land cost. Intensification around high density centres and corridors also provides a variety of housing opportunities and, where there is good quality design, a high level of amenity for future residents.

## **4.2 CENTRES AND CORRIDORS**

### ***Issue***

Evidence was presented at length that a “centres-based” approach, rather than a “centres and corridors” approach, would better serve the purpose of the Growth Concept contained within the RGS and the integration of land use and transportation.

### ***Recommended policy direction***

- References in the RPS to growth being around high density centres and corridors should be retained.
- The ARC and TAs will jointly develop a classification framework for high density centres and corridors which provides guidance on the appropriate activities in these locations. The policy for corridors may be defined along three predominant functions:
  - a. Freight or private vehicle movement
  - b. High density/mixed use – as anticipated by the RGS
  - c. Arterial roads linking high density centres and corridors that have a mix of a. and b. plus Public Transport (PT)

The classification should be based on the predominant function of the centre and corridor, including traffic efficiency, safety and amenity effects.

- District Plans should consequently be amended outside this process to reflect and implement this classification framework for centres and corridors.
- Prescriptive policies that identify the types of business and/or activities to be located within and outside of centres and corridors have been amended.

### ***Reasons***

In support of the proposition that a “centres-based” approach, rather than a “centres and corridors” approach, would better serve the purpose of the Growth Concept contained within the RGS and the integration of land transport and land use, submitters gave evidence that, among other things,:

- A centres-based approach better ensures the viability and integrity of town centres;
- A quality, compact urban environment is better facilitated by clustering retail;
- Efficient use of infrastructure is facilitated by controlled retail development centres;

- Urban form outcomes require certainty for investment;
- Out-of-centre exceptions represent lost opportunities for centres-enhancement;
- Greater transportation efficiency is gained by consolidating high trip-generating retail in centres;
- Dispersal along corridors generates significantly more traffic, increases the number and length of trips with consequent effects from emissions and congestion.

In support of the alternate proposition, submitters gave evidence that, among other things,:

- The Growth Concept explicitly provides for growth along corridors;
- Population growth and demand appears likely to outstrip available retail land in centres;
- In an RMA context, centres do not need protection;
- The argument that a centres-based approach achieves transportation efficiency is flawed because the majority of supermarket customers are car-dependent for main order shopping trips;
- The facilitation of multimodal integrated transport management supports a centres and corridors approach when locating development;
- Transport efficiency can be optimised by locating supermarkets in the centre of their catchment, which is not necessarily within town centres;
- Large Format Retail would dominate centres if required to be located there and is not necessarily compatible with good urban town centre design;
- Large Format Retail has operational requirements fundamentally unsuited to a town centre, active street frontage – vehicle access, car parking, building layout.

The Panel is cognisant that the high density centres and corridors approach underpins the Growth Concept and notes that the ARC and several TAs are well advanced in developing classification systems for centres and corridors. This work will help identify those centres and corridors appropriate for certain types of activities and will feed into the consequential amendments to District Plans.

Development of a classification system provides for the assessment of the location of an activity within a centre and along a particular corridor, to determine if they accord with or conflict with the predominant function of that centre or corridor.

In the absence of a robust classification system for assessing the merits of development in corridors or centres or both locations, the Panel does not consider it is appropriate to implement a blanket policy approach. The Panel does, however, acknowledge that a key driver in determining the location of an activity should be whether the activity integrates with the surrounding land use and transport network. It is noted that RPS Plan Change 6 encourages intensification in both high density centres and corridors as identified in Schedule 1-1.

The Panel was advised that the classification and prioritisation of centres and corridors is a key work-stream within the Growth Forum's current review of the RGS, which is being undertaken as a parallel process.

The policies in the RPS that identified the types of business and/or activities to be located within and outside of centres and corridors have been amended. Activities that support high density centres and corridors are encouraged to locate in these areas, provided that the

effects of such activities on the transport network can be managed. Exclusive lists that specify activities do not allow for flexibility and change over time.

The Panel recognises that not all private vehicle trips can be reduced. At the same time, uptake of travel demand measures and passenger transport, cycling and walking is necessary if the Growth Concept is to be realised.

### **4.3 NEW RURAL AND COASTAL SETTLEMENTS**

#### ***Issue***

A number of specific proposals for new settlements were presented to the Panel. New settlements are not currently provided for in the RPS – any urban expansion must be contiguous with existing settlements or the MUL.

#### ***Recommended policy direction***

- New provisions have been included within the RPS for the establishment of new rural or coastal settlements in circumstances where they either fully utilise existing rural capacity, or they are approved following a region-wide strategic review. New Policies 2.6.2.5 and 2.6.2.6 and associated criteria will enable proposals for new rural or coastal settlements to be considered and assessed.

#### ***Reasons***

The Growth Concept is predicated on a compact urban environment within the MUL and rural and coastal settlements. Compact environments avoid the spread of urbanisation effects.

The new policies provide for new smaller-scale settlements in circumstances where they fully utilise existing rural capacity, integrate land use and transport, provide for environmental enhancement and/or restoration, and address other matters. Settlements of this scale which do not result in growth being diverted into rural areas and which result in environmental and other benefits are consistent with the Growth Concept.

New larger-scale settlements may be provided for where they are approved following a region-wide strategic review that considers the appropriateness of the proposal in the context of the Growth Concept.

In some cases, new settlements may be designed to achieve better environmental outcomes than urban expansion or rural development as currently provided for in District Plans.

### **4.4 COUNTRYSIDE LIVING**

#### ***Issue***

RPS Change 6 limits countryside living to that contained in District Plans as at 31 March 2005 and/or changes or variations notified prior to that date.

Evidence was presented for and against the proposition that permitting more widespread countryside living would better serve the purpose of the Growth Concept within the RGS and the integration of land use and transportation.

Submissions requested that Countryside living should be defined.

### ***Recommended policy direction***

- The proposed policy specifying the cut-off date of 31 March 2005 should be deleted.
- The policies in the RPS providing for additional Countryside living have been amended and linked to rural capacity.
- The term Countryside living is already defined within the Operative RPS and no amendments are required.

### ***Reasons***

Supporters of the proposition that additional Countryside living should be provided gave evidence that, among other things:

- Countryside living can be organised in such a way (e.g. clustering) as to minimise the adverse land transport and land use effects;
- Countryside living is a legitimate “housing” choice envisaged by the Growth Concept;
- Current countryside living opportunities are not evenly distributed throughout the region requiring some flexibility in controls.

Supporters of the alternate proposition gave evidence that, among other things:

- Countryside living is already factored into the Growth Concept – 30% of the region’s population is planned to be living in non-urban situations in 2050.
- The Region currently has in the order of 40 years spare capacity at present demand rates (c. 650 per year), for land of 8 hectares or less, under operative district plan provisions. This represents some 28,800 titles.
- Countryside living is less efficient in transport terms than urban living;
- Countryside living, if not carefully monitored and managed, has the potential to undermine the compact urban form that underpins the Growth Concept.

The Panel considers that rural capacity should be the primary determinant in the management of countryside living. The amendments proposed to the RPS are a more appropriate means to ensure high-level policy direction for countryside living.

Insufficient evidence was presented to justify or present a rationale for the retention of the cut-off date of 31 March 2005. This date was the notification date for plan changes under the LGAAA.

## ***4.5 DEFINITION OF RURAL ACTIVITIES AND URBAN ACTIVITIES***

### ***Issue***

The definitions proposed by RPS Change 6 are made more complex by introducing community-served considerations and identifying specific lists of activities. This raises the issue that the definitions could be interpreted exhaustively, as an exclusive list, leading to the misconception that there is no provision for legitimate rural activities.

### ***Recommended policy direction***

- Urban activities should generally be directed to urban areas.
- The policy proposed in RPS Change 6 that urban activities should be prohibited in rural areas has been amended.

- The definition of urban activities has been amended to be more effects based. The new definition incorporates urban development. Accordingly, the definition of urban development has been deleted.
- The definition of rural activities has been deleted.

### ***Reasons***

The Growth Concept contained within the RGS puts greater emphasis on urban intensification than urban expansion, supporting a compact urban form.

Prohibition is a specific RMA term and is not appropriate to generally define an activity in a policy document.

The Operative RPS contains a definition for urban development. Urban development is a concept that has been tested and supported by case law and assists in determining thresholds in terms of scale. The definition of urban development has been deleted. The new definition of urban activities sets out the key elements of such activities and encompasses development that occurs within the urban environment, utilising the previous urban development definition.

The proposed definition for rural activities is unnecessary. The RPS has no specific policies relating to rural activities that require a definition. Deleting the definition of rural activities further clarifies the definition of urban activities. The amended definition of urban activities addresses the effects (including cumulative effects) of urban activities.

## **4.6 URBAN DENSITY – RPS Appendix H**

### ***Issue***

Currently Appendix H provides a guideline of household and employment densities required in high density centres and corridors to support the public transport system. Extensive evidence was put before the Panel regarding the link between residential and employment densities and the provision of reliable and efficient public transport.

### ***Recommended policy direction***

- The RPS retains Appendix H
- Appendix H remains as a guideline; it is not mandatory
- District Plans shall make specific reference to Appendix H

### ***Reasons***

The Growth Concept promotes intensified centres and corridors. The RPS defines these as high density centres and corridors. Appendix H details the densities required in high density centres and corridors to support the public transport system.

The RPS needs to provide direction on density. In addition, District Plans need to provide a level of certainty that intensification targets supportive of public transport objectives will be achieved.

It is noted that Appendix H to RPS Change 6 is not mandatory.

## **4.7 REVERSE SENSITIVITY**

### ***Issue***

The ongoing functioning and operation of regionally significant and nationally significant infrastructure may be prevented or curtailed by incompatible land uses.

### ***Recommended policy direction***

- The Panel supports the ongoing policy development and implementation strategies by each TA to address reverse sensitivity issues in their district.
- An additional policy to be included in the RPS to address the issue of reverse sensitivity in relation to such infrastructure. The policy will remain at a high level in the RPS and TAs should respond accordingly through the provisions of their respective District Plans.
- TAs should work together to address cross boundary issues with reverse sensitivity.
- No changes should be made that remove the obligation on the part of infrastructure providers to mitigate the adverse effects of their operations on neighbouring land uses.

### ***Reasons***

It is necessary to manage adverse effects on nationally and regionally significant infrastructure arising from reverse sensitivity issues, particularly where such infrastructure contributes to the Growth Concept contained within the RGS and integration of land use and transportation. The RPS includes a number of references to addressing reverse sensitivity. However, the RPS is not explicit in addressing reverse sensitivity effects in relation to infrastructure, in particular nationally and regionally significant infrastructure. If not addressed, there is potential for adverse effects on the maintenance and operation of nationally and regionally significant infrastructure. The Panel sees impact mitigation as a co-operative 'two-way' process. Infrastructure providers should take reasonable and practicable steps to mitigate the adverse effects of their activities.

The policy will ensure the ongoing functioning of lawfully established nationally and regionally significant infrastructure in areas undergoing change and development. It will assist in providing investment certainty and confidence for infrastructure operators charged with their maintenance and functioning. In general, recognition of reverse sensitivity as a legitimate effect for consideration does not absolve infrastructure authorities or operators from their responsibility under s17 of the RMA to avoid, remedy, or mitigate any adverse effect on the environment arising from an activity carried on by or on behalf of that person.

District Plans already recognise the reverse sensitivity effects of certain activities on other lawfully established activities. There may also be cross boundary issues to be addressed of regionally significant infrastructure that traverses TA boundaries, such as the Marsden Point to Wiri pipeline.

In addition to urban-based reverse sensitivity issues, evidence was heard regarding reverse sensitivity effects on resource dependent activities such as quarrying, agriculture and horticulture. This is already provided for in the Operative RPS and District Plans, and the Panel supports the ongoing policy development and implementation strategies by each TA in this respect.

## **4.8 INTEGRATED TRANSPORT ASSESSMENTS**

### ***Issue***

RPS Change 6 as notified included a method to utilise transport audits to assess the adverse effects of new major trip generating activities. To better address adverse effects, it was submitted that ARTA's revised transport assessment methodology should be adopted. This new methodology provides for assessment at an earlier stage in the development process, thereby improving integration of land use and transportation and giving effect to the Growth Concept in the RGS.

### ***Recommended policy direction***

- The Panel accepts that reference to integrated transport assessments is a necessary concept in the RPS and, for major trip generating activities, appropriate controls should be provided for in District Plans. For example, the application of integrated transport assessments should become an integral part of MUL changes, structure planning processes, plan changes and major development proposals.
- ARTA's Integrated Transport Assessment guidelines (2006) provide guidance, but compliance with these guidelines should not be mandatory. Applications for major trip generating activities should be subject to an integrated transport assessment. Guidance on what these assessments should include is provided in the new Appendix J to RPS Change 6.
- At the resource consent level, applications for major trip generating activities should include integrated transport assessments as part of the assessment process.

### ***Reasons***

In circumstances where the adverse effects of major trip generating activities cannot be avoided, they should be mitigated. It is appropriate to have a mechanism to ensure that land use and transport are integrated. Where there is a requirement for a particular methodology in the RPS, then technical guidance should be provided.

## **4.9 SEA TRANSPORT & FERRIES**

### ***Issue***

A number of submissions requested that the RPS provide further reference to the importance of ferry transport and sea transport (principally the Ports) to the region, and recognise it within the context of land transport infrastructure. The issue of reverse sensitivity effects in relation to strategic port facilities was also raised as an issue.

### ***Recommended policy direction***

- Ferry transport should be recognised as a key transport mode in Chapter 2 and Chapter 4 of the RPS and, as appropriate, in the District Plans. This will ensure that ferries and associated infrastructure are clearly identified as being at the same level as land based transport.
- Further reference should be made in the RPS to the role that ports play in supporting transport infrastructure in the region.
- A new policy has been included in the RPS to address reverse sensitivity effects on regionally significant infrastructure, such as port facilities.

### ***Reasons***

A key purpose of the LGAAA is to integrate “land use and land transport”. The term “land transport” is defined in the Land Transport Act 1998; this definition includes ferries. The importance of ferry transport should therefore be recognised in the RPS.

Port facilities are identified as regionally significant infrastructure in the RPS definitions.

## **4.10 GREENFIELD BUSINESS LAND (GROUP 1)**

### ***Issue***

The region has limited land available within the MUL for Group 1 activities such as manufacturing, industry, construction and transport related activities. There is a relatively short time frame remaining until land for these types of activities is projected to run out.

### ***Recommended policy direction***

- Objectives, policies, methods and reasons in the RPS have been added and/or amended to identify and provide for future capacity for Group 1 business activities.

### ***Reasons***

High level policies have been put in place to safeguard Group 1 business land supply and provide for additional capacity where required. This ensures that land allocated for Group 1 activities is integrated with transport and is not displaced by other business activities.

## **4.11 RETAIL ACTIVITY**

### ***Issue***

Certain types of retail activity have a large land requirement and the region’s planning documents are currently not clear on how this will be managed.

### ***Recommended policy direction***

- A method has been included in the RPS to identify a regional approach to accommodate retail activity. This approach will need to give effect to the Growth Concept contained within the RGS and integrate land use and transport.
- This regional approach will guide TAs in their amendment of District Plans to address retail activity.

### ***Reasons***

Retail has the potential to either reinforce or frustrate the Growth Concept contained within the RGS.

No preference should be given in policy to particular retail activities, inferring precedence or promotion of those activities. Instead, selection should be based on the effects of retail activities, whatever their format, using effects-based criteria.

In advance of regional policy direction and because of the need for TAs to work through and consult on the location of certain retail activities, it would be inappropriate to require TAs to be prescriptive in the LGAAA plan changes regarding the location of those activities.

## **4.12 SOCIAL & COMMUNITY ISSUES**

### ***Issue***

Where urban intensification is decoupled from quality urban design, there is a risk of poor quality development resulting in an undesirable living environment for future generations.

### ***Recommended policy direction***

- Where TAs have not yet adopted design controls into their District Plans, these should be prepared and adopted.
- Changes to be made to urban design policies to clarify and enhance urban amenity.

### ***Reasons***

To achieve a compact city increased densities are required. A number of submitters raised concerns that increased density brings with it overcrowding, exacerbation of health problems, risks to public safety and detrimental impacts on social wellbeing. Submitters identified specific concerns with the size of individual units and the lack of internal and external amenity. Another factor that has contributed to low acceptance of medium to high density developments is the issue of leaky homes.

The advancement of higher intensity living options is central to the Growth Concept. To achieve this, the appropriate planning tools are required, including design controls. A number of TA's currently have design guides and/or controls in place or in train.

The Panel accepts that there may be some risks associated with poor quality, high density developments. However, the Panel considers that this risk can be considerably minimised through strong and consistent urban design controls to manage the design and quality of new developments. This will provide a range of living choices in quality environments.

## **4.13 PROTECTION/PRESERVATION OF SIGNIFICANT LANDSCAPES, VALUED ENVIRONMENTS & SENSITIVE CATCHMENTS**

### ***Issue***

It is recognised that Significant Landscapes, highly valued environments and sensitive catchments need protection in planning documents. The Growth Concept seeks to avoid growth in such areas. Further wording is necessary to ensure these are protected, particularly in relation to the Waitakere Ranges, including the foothills.

### ***Recommended policy direction***

- The RPS should continue to protect significant landscapes, valued environments and sensitive catchments.
- Policy direction should be strengthened to protect the Waitakere Ranges, within the scope of RPS Change 6.

### ***Reasons***

Submitters expressed concern regarding the cumulative effects of activities on significant landscapes, valued environments and sensitive catchments in rural areas as a result of poorly sited Countryside Living and gradual urbanisation. Others submitted that these matters were outside the scope of the LGAAA.

The RPS currently contains provisions for the protection of significant landscapes, valued environments and sensitive catchments. These existing provisions remain in force and are not subject to amendment through the LGAAA process.

The Panel considers that any development that adversely affects significant landscapes, valued environments and sensitive catchments would not achieve the purpose of the LGAAA. The Growth Concept seeks to enhance the protection of such areas by focusing urban development into urban areas. Moreover, any development that adversely affects significant landscapes, valued environments and sensitive catchments is unlikely to efficiently integrate land use with land transport systems.

Waitakere City Council presented evidence that, in order to achieve the dual objectives of protection of valued areas and better alignment with the Growth Concept contained within the RGS, it has moved projected growth out of the Waitakere Ranges, including the foothills and coastal villages, and into the MUL. The RPS has been amended to support this approach. Evidence was also presented that the Waitakere Ranges Heritage Area Bill, currently progressing through Parliament, is another mechanism for enhancing protection of the Ranges, including their foothills and coastal villages.

#### **4.14 FURTHER RECOMMENDATIONS**

The Panel was informed that a number of TAs have plan changes or similar under preparation that would, independently of the LGAAA process, change land use and transport provisions in the District Plans to give effect to the Growth Concept contained within the RGS and contribute, in an integrated manner, to the matters specified in Schedule 5 of the LGAAA. The Panel recommends that those TAs continue with such changes to their planning documents to ensure alignment with the RPS following the LGAAA process.

The Panel will make further recommendations to certain public entities with key roles in implementing the Growth Concept contained within the RGS and integrating land use and transport in the region. These further recommendations relate to procedural matters that arose during the course of the hearing process.