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Auckland Council
The Auckland Plan
Discussion Document

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NZCID Submission on Auckland Unleashed

The New Zealand Council for Infrastructure Development (NZCID) welcomes the opportunity to submit on the Auckland Council's Auckland Unleashed Auckland Plan Discussion Document.

Key Messages

NZCID considers the discussion document to represent a positive beginning to the engagement process.

We acknowledge that temporal constraints and the early stage of the process have required the discussion document to be high level. Furthermore, we recognise much more information 'sits behind' the discussion document.

While the discussion document provides a clear statement of vision, NZCID submits that the Auckland Plan must provide clarity about how the vision is to be implemented. The discussion document is heavily focused on principles, issues and opportunities, all of which were adequately developed and identified under the previous governance regime. The key to success for the new Council is to define the vision in terms of realistically achievable outcomes; to set out the strategy and supporting policies that will achieve those outcomes; to specify the investments that are necessary; and to identify the necessary resources, including funding methods, to enable the plan to be delivered and implemented. Where the old system failed was on implementation. There is little evidence in the discussion document that thinking has changed.

NZCID is particularly concerned that the Council risks nonconformity with the Local Government (Auckland Council) Act 2009 (the Act) which sets out the requirements of the spatial plan. This submission sets out the steps that NZCID recommends should be followed to ensure that the Auckland spatial plan provides a land use and infrastructure development plan that supports the Mayor's vision to create the "world's most liveable city".

Auckland Unleashed scorecard

Section 79 of the Act sets out the requirements of the Auckland spatial plan. NZCID has evaluated the discussion document against the provisions of the Act and produced the following scorecard:

Table 1: Spatial plan scorecard

Act	Provision	Complete
(1)	The Auckland Council must prepare and adopt a spatial plan for Auckland.	
(2)	The purpose of the spatial plan is to contribute to Auckland's social, economic, environmental, and cultural well-being through a comprehensive and effective long-term (20- to 30-year) strategy for Auckland's growth and development.	✓
(3)	For the purposes of subsection (2), the spatial plan will—	
(a)	set a strategic direction for Auckland and its communities that integrates social, economic, environmental, and cultural objectives; and	✓
(b)	outline a high-level development strategy that will achieve that direction and those objectives; and	✓
(c)	enable coherent and co-ordinated decision making by the Auckland Council (as the spatial planning agency) and other parties to determine the future location and timing of critical infrastructure, services, and investment within Auckland in accordance with the strategy; and	X
(d)	provide a basis for aligning the implementation plans, regulatory plans, and funding programmes of the Auckland Council.	X
(4)	The spatial plan must—	
(a)	recognise and describe Auckland's role in New Zealand; and	✓
(b)	visually illustrate how Auckland may develop in the future, including how growth may be sequenced and how infrastructure may be provided; and	X
(c)	provide an evidential base to support decision making for Auckland, including evidence of trends, opportunities, and constraints within Auckland; and	✓
(d)	identify the existing and future location and mix of— <ul style="list-style-type: none"> ▪ (i) residential, business, rural production, and industrial activities within specific geographic areas within Auckland; and ▪ (ii) critical infrastructure, services, and investment within Auckland (including, for example, services relating to cultural and social infrastructure, transport, open space, water supply, wastewater, and stormwater, and services managed by network utility operators); and 	X
		X
(e)	identify nationally and regionally significant— <ul style="list-style-type: none"> ▪ (i) recreational areas and open-space areas within Auckland; and ▪ (ii) ecological areas within Auckland that should be protected from development; and ▪ (iii) environmental constraints on development within Auckland (for example, flood-prone or unstable land); and ▪ (iv) landscapes, areas of historic heritage value, and natural features within Auckland; and 	✓
		✓
		✓
		✓
(f)	identify policies, priorities, land allocations, and programmes and investments to implement the strategic direction and specify how resources will be provided to implement the strategic direction.	X

Table 1 indicates where NZCID observes insufficient progress in regard to the provisions of the spatial plan, as evidenced through the discussion document.

It is critical to note at the outset that the purpose of the plan is to **contribute** to Auckland's social, economic, environmental, and cultural well-being through a **comprehensive and effective long-term (20- to 30-year) strategy for Auckland's growth and development.** (Emphasis added). The plan is not a social, economic, environmental and cultural plan. The primary content of the plan is clearly set out in section 4 (a) to (f) as a land use, growth and infrastructure development plan. NZCID considers the Auckland Plan must devote most of its content to identifying the spatial growth areas and the supporting infrastructure investments that are required to deliver the social, economic and environmental outcomes that are sought.

The discussion document shows good appreciation of its role in setting strategic aspiration for the development of the region and also provides an adequate basis for feedback into the role of Auckland.

NZCID finds that the discussion document recognises the high level purpose of the Auckland Plan in the consideration of all four well-beings in light of long term pressures. Content in the discussion document shows the evidence base is sufficient to fulfil the requirements of the Act. NZCID is satisfied the draft Auckland Plan document will be able to provide sound information on not only trends, opportunities and constraints, but also much greater detail into recreational, open-space, ecological, heritage and other significant environmental areas.

While it is strong on identifying key social and economic deficiencies that must be addressed, the discussion document lacks the substantive evidence base to justify the nature and timing of the interventions proposed to address those deficiencies. The scorecard highlights a number of areas where NZCID understands the discussion document needs much greater work in order to meet the requirements of Section 79.

Firstly, while the discussion document recognises the Auckland Plan's role as a high level strategy, there is no reason to believe the direction and objectives of the Auckland Plan can be achieved. For NZCID and wider Auckland to be convinced that the Auckland Plan is not going to suffer the same deficiencies as the Auckland Regional Growth Strategy a clear pathway to achievement is essential. Specifically, what is the Council going to do to:

- Put children and young people first,
- Turn Auckland into an innovative, outward facing, etc city,
- Acknowledge the special place of mana whenua,
- Become more welcoming and open to investment, workers, etc,
- Make communities dynamic, safe, secure, etc,
- Provide a sustainable lifestyle with rising quality of life,
- Attain recognition for Auckland's environmental setting,
- Develop world-class infrastructure, and
- Make Auckland beautiful?

NZCID finds no evidence in the discussion document that the Council is sure of the actions required to achieve these goals/objectives. Moreover the wider social and economic agenda set out in the plan extends well beyond the requirements of the legislation whilst failing to address the critical land use and infrastructure needs of the city, which is the very purpose of the spatial plan.

Secondly, NZCID so far finds no evidence that coherent and coordinated decision-making will be enabled through the Auckland Plan process. NZCID pays special attention to the Act's specific mention of "other parties". The Auckland Council is a minority investor in Auckland, with various central government agencies and the private sector providing by far the dominant share of capital and operating investment in Auckland.

NZCID's interpretation of the Act is that the Auckland Council is to show leadership through the spatial plan process in providing certainty to other parties that the Council's share of investment as well as land and other resources will be available when the Council says they will be available. It is not possible for other parties to have confidence to invest in Auckland if infrastructure priorities, land use functions and other Council-influenced areas are either not specified or change on a frequent basis.

Far from providing this degree of certainty, the discussion document outlines multiple challenges, issues, problems, conflicts, constraints and other barriers to investment without providing assurance decisions will be made to overcome these.

Third, while the discussion document provides a hierarchy of planning documentation for Auckland, it provides no basis for aligning these and other plans and programmes. It simply states what is already outlined in statute.

NZCID understands the object of the Act in this regard to be more directorial than appears to be the interpretation of the Council. NZCID notes that the Act is somewhat vague in its instruction (3 (d)), but to ensure implementation and avoid the consequences of conflicting policy and investment, the Auckland Plan must do more than occupy the highest rung on the Auckland policy ladder. It must in NZCID's view specify which plans, programmes and investments will give effect to which elements of the Auckland Plan.

NZCID recognises the limited statutory power of the Auckland Plan, but by stating clearly and specifically its expectations of other plans and programmes, and which aspect of the vision those plans and programmes will be responsible for delivering; the Auckland Plan will improve accountability. Moreover, how each piece of the wider planning puzzle fits into the new planning framework will become more transparent and structured and issues more readily identified. NZCID reinforces the importance for the Auckland Council of seizing all opportunities created by the spatial plan process and not limiting itself to minimum statutory requirements. That said the spatial plan was intended by legislation to contribute to the delivery of the four well beings through spatial planning. The legislation did not intend development of a plan that addresses, in one document all of the social, cultural, economic and environmental needs of the region, many of which are central government responsibilities that extend well beyond the capabilities and resources of the Council.

Fourth, NZCID is satisfied that the Council can capably illustrate how Auckland may develop in future, but NZCID is not convinced the Council has taken the necessary steps to determine sequencing. To satisfy the Act the Council must do more than provide a spatial vision of Auckland in 2040. Decisions are needed in the immediate future regarding priority areas for growth and investment. These decisions will impact on residents in the short term and can thus be expected to arouse significant opposition.

For NZCID to be convinced the Council is serious about tackling growth pressures, detail on the location of short term growth and development in particular is required. The discussion document goes no further than to outline reasons why growth and development do and must occur. NZCID expects detailed information to be contained in the draft Auckland Plan.

Fifth, NZCID observes that the discussion document provides some high level detail of the existing location of residential, business, rural and industrial activities, as well as critical infrastructure, services and investment. However, information as to future locations and investment is extremely light. With the exception of several very large proposed transport projects, there is no significant discussion or mapping of future infrastructure.

NZCID acknowledges the limitations of the discussion document and emphasises the importance of including this information in the draft Auckland Plan. The expectation of NZCID with respect to critical infrastructure is expanded on below.

Finally, NZCID considers that the discussion document does not adequately address policies, priorities, land allocations, programmes and investments, and resources necessary to implement the strategic vision. In the view of NZCID, this is the single biggest deficiency of the discussion document.

Part 4(f) is the spatial plan's point of difference with other regional documents, notably the Auckland Regional Growth Strategy 1999. Failure to sufficiently address 4(f) will greatly increase the risk that the Auckland Plan will not deliver.

NZCID considers the identification of policies, priorities, land allocations, programmes and investments, and resources to represent the implementation arm of the spatial plan. Implementation in the discussion document is accorded one page and funding a further page. NZCID notes that monitoring, not set out as a requirement of the Act, is also accorded one page. NZCID congratulates and fully supports the Council in identifying monitoring as a priority, but is equally unconvinced the Council is prepared to implement the Auckland Plan.

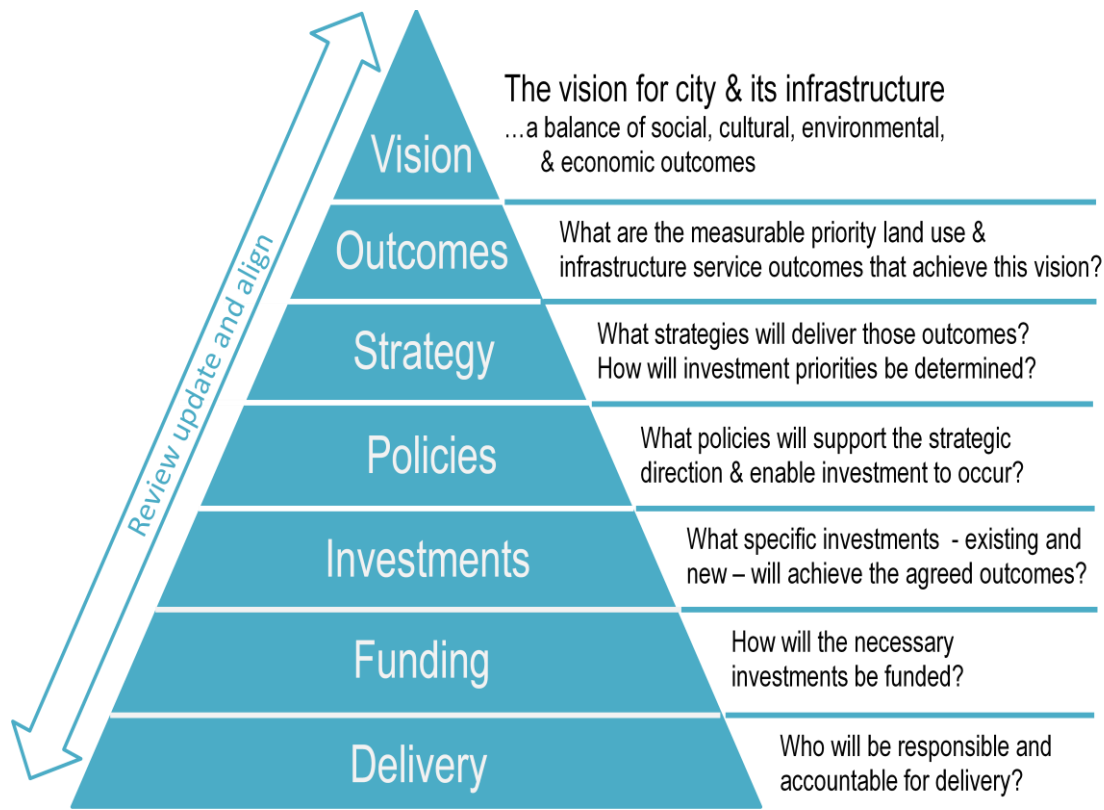
NZCID notes that the Mayor and Councillors are committed to delivery of the Auckland Plan (para. 516), but finds little substance within the discussion document to substantiate this. NZCID would have expected a significant portion of the discussion document to be dedicated to questions of resourcing and capability, and methods of procurement and delivery. In the view of NZCID, none of these aspects are given due attention and consequently NZCID harbours concern that the Auckland Plan will not deliver for Auckland.

In the view of NZCID, the awkward and uncomfortable decisions regarding growth and development must be tackled by the draft Auckland Plan. The previous governance regime was reformed because it could not handle implementation. The Auckland Plan must.

NZCID Strategic model

NZCID has developed the following strategic planning and delivery model and submits that it provides a coherent framework for the Auckland Plan. NZCID observes that the model is well-aligned with the requirements of the spatial plan as outlined in the Act and could be employed by the Council as a guide for the Auckland Plan process:

Figure 1: Delivering the Vision



Vision

At the apex of both the above model and regional planning is vision. NZCID supports the Mayoral Vision for Auckland to become the World's Most Liveable City and thinks this provides the broad overriding aim required to guide regional policy, planning and investment. All other regional policy must in some practical way contribute to the Mayoral Vision – first and foremost the Auckland Plan.

Outcomes

Recognising the vision for Auckland, the Auckland Plan must articulate what outcomes will be required in order to make Auckland the World's Most Liveable City. NZCID distinguishes between 'outcomes' and 'objectives', with the former focused on achievement and the latter on ambition. The outcomes identified in the Auckland Plan must be achievable and measurable.

Strategy

After outcomes have been identified, the strategy the Council will pursue to achieve those outcomes should be developed. NZCID considers the most important element of strategy subject to strong influence from the Council relates to urban form. Inability to promote the appropriate urban form for Auckland is very likely to prevent the city from becoming the world's most liveable.

NZCID encourages the Council to support intensification where appropriate and urban expansion where it provides relative advantage. Both intensification and expansion will be required and no blanket approach for the region should be pursued.

NZCID considers the principle determinant for understanding the urban form to be transport investment. Specifically, it is the financial, technical and political ability of Council to provide transport solutions to communities which should determine whether intensification or expansion best suits that community's and wider Auckland's needs.

NZCID acknowledges the importance of other infrastructure service provision, notably water, energy and telecommunications services and key social infrastructure facilities such as universities, hospitals convention centres and other public institutions. Development cannot proceed in the absence of these critical services. However, NZCID understands that the first order of priority to be identification of areas for development consistent with access. Secondly, but before development proceeds, an assessment of the ability to provide other infrastructure services should be conducted.

Given the large investment in rail over recent years, and the Mayor's support for further investment, NZCID considers that development around the rail network is the regional spatial priority. Locating residents and businesses around rail nodes will defer the need for new roading investment, lower per capita public transport spending and promote numerous social and environmental outcomes. Moreover, it is achievable in the short term and will require relatively few additional resources.

NZCID disagrees with the identification of 'an international city centre and fringe', a 'southern opportunity area' and a 'north-western opportunity areas' as spatial priorities. NZCID understands no rationale for prioritising these areas. NZCID agrees that opportunities exist in these areas, but as immediate priorities they cannot be supported by current resourcing and are too ambitious for the timeframes permitted.

Furthermore, under current constitutional arrangements NZCID considers the predominant drivers of the discussion document's possible social and economic development priorities to be more appropriately addressed by central government. NZCID understands the Council's desire to impact issues in these areas, but emphasises that the Council lacks the resources necessary to deal adequately with them. NZCID recognises that the Auckland Plan is a partnership between central and local government but does not believe there is time in the development of the first version of the Auckland Plan to align and integrate central and local government thinking to the extent required.

Over the longer term, should the Council wish to focus on complex social and economic issues for which it is largely dependent upon central government resources, then the Council should evaluate its options. In the view of NZCID, two elections every three years will indefinitely undermine efforts to integrate central and local government economic and social policy.

NZCID recommends that the Council focus on leveraging the opportunities emerging from existing central and local government investment, particularly the investment in rail and road networks. The Council can achieve multiple economic and social objectives by focusing on transport-served areas, drawing on the specialised skill sets retained within the Council itself. Specifically, land use planning, urban development and community engagement in areas affected by rail should be the immediate priority of Council, together with the land use development opportunities presented by the completion key motorway linkages.

NZCID notes that rail investment is central to two of the three possible spatial priorities (para. 62). In no area is development around the rail network more important than in the central city. The proposed CBD rail loop is an important regional project supported by NZCID. NZCID emphasises the added value a CBD loop provides by lifting substantially the capacity of Britomart and maximising the impact of existing rail investment.

However, in order for the benefits of the CBD loop to be realised, land use must support the rail programme. Should the CBD loop proceed along the currently proposed alignment, NZCID envisions land use intensification around Albert St and the adjoining area, Aotea Square and the adjoining area, K Rd and the adjoining area, and Eden Tce and the adjoining area.

Wynyard Quarter is not serviced by the CBD loop and unless there is a route change should not be developed in the near term. Providing alternative transport solutions in the absence of the CBD loop will be expensive and may be disjointed from the wider transport system. Inadequate public transport solutions will increase dependence on private motor vehicles and congest the central city area.

Developing Wynyard Quarter at the same time as the CBD loop will lower the attraction of developing land both adjacent to CBD rail stations and in the Wynyard Quarter itself. Conversely, sequencing growth so that development follows rail investment first along the CBD loop will maximise the impact of investment, align with policy, ensure mode shift, maximise the value of rateable land and produce a more liveable city. NZCID observes no empirical basis for developing Wynyard Quarter simultaneously with the CBD loop.

Outside the central city, NZCID expects that where new areas are opened up for intensified development primacy should be given to those adjacent to the rail network. In practice, this means leveraging the investments already made in stations at Newmarket and New Lynn and capitalising on investments in new lines at Onehunga and Manukau.

In the view of NZCID, development in other areas of Auckland, notably coastal areas, the northwest and parts of the North Shore not proximate to the busway should not be encouraged unless appropriate transport solutions have been identified and resources allocated. This will require substantial investment in roads to support increased traffic density and in the provision of bus rapid transport services in the absence of rail services.

Development of the city centre will be significantly influenced by the timing and location of the next Waitemata Harbour Crossing. The discussion document largely assumes that the alignment of the crossing will conform with NZTA's preferred alignment from Onewa to Wynyard quarter then linking into the Central Motorway Junction. Its attention is focussed on feedback on whether the crossing should be a tunnel or a bridge. NZCID notes that the development of this western alignment precedes the development of the spatial plan. It has therefore not been guided by the land use requirements of the plan. At the time of its development in 2008, the preferred alignment was significantly influenced by both cost and perceived consenting constraints.

NZCID has reviewed both the 2008 harbour crossing study and the latest 2011 study. NZCID has concluded that potentially more beneficial alignments exist connecting to the east of the city at Grafton Gully. We note that, although potentially more costly, the 2008 study showed that eastern alignments demonstrated stronger economic benefits and better network resilience than the western aligned crossings. The requirement to deliver a project of this magnitude provides a rare opportunity for a single decision to substantially promote long term Auckland liveability. It is an opportunity that needs detailed consideration in the Auckland Plan. Both the form and the alignment of the crossing need to be evaluated in terms of the long term land use, transport connectivity and resilience needs of the city.

Policies and investments

Following development of a land use and broader regional strategy, the Council will need to consider the policies and investments required to implement the strategy. The relationship between strategy and the two lower parts of the above policy pyramid is slightly different than preceding relationships. Whereas strategy follows outcome identification both in terms of planning hierarchy and process order, the link

between strategy, on one hand, and policies and investments is symbiotic. That is, the appropriate strategy cannot be determined independent of existing policies and investments and policies and investments cannot proceed without strategic guidance.

The location and state of existing investment may require the Council to pursue an urban form it may not have in different circumstances. Some patterns of urban form for Auckland will be too costly to implement due to necessary infrastructure requirements. Others may conflict with central government investment priorities. The Council must make a balanced and considered decision on what urban form best meets residents' and New Zealand's needs, given available resources.

With respect to future investment, NZCID stresses that the Auckland Plan must satisfy the requirement of the Act regarding the identification of future critical infrastructure, services and investment. In particular, the draft Auckland Plan must identify critical investments.

Listing critical investments will give certainty to residents, businesses and central government that will in turn influence the decisions of those individuals and entities.

While NZCID strongly encourages the Council to determine investment following identification of a cogent strategic direction, NZCID identifies several investments which will be required largely irrespective of which strategic direction or urban form the Council pursues:

1. Waterview connection
2. CBD loop
3. Auckland Manukau Eastern Transport Initiative (AMETI)
4. Additional Waitemata Harbour Crossing

NZCID supports the continued investigation and delivery of these projects, but observes a funding shortfall for each project other than Waterview.

Funding

NZCID considers funding to be the biggest challenge facing the Auckland Council. Without funding there can be no investment and without investment policies cannot be implemented nor a vision attained. Without new funding the Auckland Plan will not be implemented.

In the attached paper, NZCID outlines its position on transport funding. NZCID proposes a \$1-\$2 charge on motorway onramps around the region both to fund local and central government's ambitious transport plans and manage travel demand.

Delivery

Once funding has been secured, delivery should in most cases follow. However, it is important that the Auckland Plan identifies the agencies that will be accountable for delivering on the vision.

The Auckland Plan's limited statutory power requires that alternative means be employed by the Council to incentivise delivery aligned to the vision. NZCID recommends that the Council identify each agency and the role that agency will play in delivering on the programmes and investments listed in the Auckland Plan.

NZCID thanks the Council for this opportunity to outline its thoughts in relation to the Auckland Unleashed discussion document. NZCID looks forward to working with the Council in the future.