

**Table 1: Requests for amendments**

Point #	Topic	Reason for comment	Change Sought
1	Approach to zoning boundaries and qualifying matters	The zoning approach applied in the draft maps appears to have the zone boundaries follow site boundaries. This includes locations where qualifying matters have resulted in a “lower” zone, for example to protect nationally significant infrastructure such as Transpower’s network and to manage coastal erosion. While these matters need to be addressed, this approach includes land within larger sites which appear to be able to be developed without impacting on the qualifying matter. This has the result of limiting development on developable portions of land below that required by the NPS-UD and the amendment Act.	Zone land in accordance with the direction in the amendment act and NPS-UD in the first instance. If there are qualifying matters, use other methods such as overlays to manage development in the affected area. If there is a technical reason why this cannot be achieved then the low density zoning should only be mapped to the qualifying matter, not whole sites.
2	Qualifying matters	Related to point 1 above, the proposed zoning includes ‘two-storey single dwelling residential area’ and ‘two storey medium density residential area’ due to the presence of qualifying matters. However, it appears irrelevant to the qualifying matters such as SEAs and aircraft noise what height structures are in these locations and this form of control is inappropriate as it unnecessarily restricts development capacity.	Zone properties in accordance with the NPS-UD and the amendment act and adjust the development controls on land affected by the qualifying matters (not the site), if required to take account of qualifying matters.  Remove all zones such as these and the ‘single house zone’ from the urban area.
3	Special character	The draft maps released by the council retain the majority of Special Character areas. In the most highly accessible locations and areas closest to the city centre, the proportion of special character areas retained appears even higher. These highly accessible areas are not just those which are within walking distance of stations and centres and include areas such as Ponsonby and Grey Lynn.	Reduce the overall scale of special character areas and substantially remove them where they are located within highly accessible areas and/or walkable catchments of centres and stations.

	<p>Waka Kotahi is concerned that the correct balance has not yet have been struck between meeting the desires of the council to retain some areas of Special Character and to enable growth in those areas of Auckland most accessible by active and public transport and which best support a healthy and sustainable future for Auckland.</p> <p>As set out in Te Tāruke-ā-Tāwhiri (Auckland’s Climate Plan) <i>“Integrating land-use and transport planning is vital to reduce the need for private vehicle travel and to ensure housing and employment growth areas are connected to efficient, low carbon transport systems”</i>. Enabling development in the city centre fringe and other highly accessible areas in the inner isthmus is Auckland’s best opportunity to implement this integration.</p> <p>We note the two-tier system used to determine whether an area contains enough ‘special character’, differentiating between walkable catchments and other areas. While we appreciate that walkable catchments have been taken into account through this approach, we consider that a higher level of priority should be applied to areas of high accessibility and/or walkability. As the council is well aware, areas outside of walkable catchments can offer greater levels of accessibility to jobs and other opportunities than locations within a walkable catchment. Waka Kotahi has mapped the region in terms of accessibility and can provide these maps to enable Council to identify the area with the highest levels of accessibility.</p> <p>Similarly improved levels of nuance and enabling of intensification should also be applied between walkable catchments. Areas such as Grafton, within the walkable catchment of the City Centre, a Metro Centre and a rail station should have to reach an even higher threshold than that applied to a standard walkable catchment. As a general point, Waka Kotahi is disappointed by the council’s decision to use the 66% level of ‘special character’ that reflects</p>	
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		merely the “general presence of special character” rather than the “high quality” reflected by the 75% threshold. Waka Kotahi would encourage the council to significantly revise these thresholds to better balance the retention of areas they consider worthy of special character with the need to reduce emissions and enable development in accessible areas.	
4	Walkable catchments	<p>In general, at this time, Waka Kotahi support the walking distances adopted by Council but will review other feedback when it is submitted on the draft proposal. We do suggest that the walkable catchment of the city centre could extend further and encourage the council to consider distances of 1500-1800m.</p> <p>In noting that walking distance is preferable to straight line measures, it is apparent that temporary restrictions on walkability are unnecessarily reducing development capacity in accessible locations. As it is a costly and complicated process to implement future plan changes to re-zone land following changes on the ground to pedestrian connections, it is preferable to implement longer term zoning decisions now. Examples of areas where the zoning should be adjusted include the east side of Sylvia Park and south of New Lynn.</p> <p>There are also small gaps between walkable catchments which should be up-zoned such as between Mt Albert and Avondale and Constellation and Sunnynook.</p>	In conjunction with the centres review requested below, review each walkable catchment and expand to a logical area.
5	Centres	<p>It appears that no assessment has been carried out as to the extent and future nature of centres. With the re-development of land for intensive uses around centres, it is likely that the role and scale of centres will evolve, and Council should proactively plan for this.</p> <p>It also appears that the walkable catchment of some smaller centres has been measured too narrowly as they have been measured from the edge of the centre zone rather than the</p>	<p>Carry out a review of the scale and distribution of centres across the urban area and the development controls which apply to them in conjunction with accessibility mapping.</p> <p>Increase development capacity within centres based on this review where relevant and measure walking distance from the edge of the practical future centre, not the current centre zone.</p>

		practical current and future extent of centre. Examples of this include Mission Bay, Takapuna and Browns Bay. A review of the above issues combined with the accessibility mapping referred to above would address this issue and identify where zoning within and around centres should be expanded.	
6	Light rail	<p>Waka Kotahi note that Auckland Light Rail and Council are in discussions around the project and its interaction with land use with the project inevitably leading to further up-zoning under the NPS-UD once its station locations are identified. These discussions are evolving and will continue separate to these comments.</p> <p>Regardless of these discussions and timing for when there is more certainty around station locations, the land within the Auckland Light Rail Corridor is highly accessible and ultimately it should be largely up-zoned around the Sandringham Road, Dominion Road and Mt Eden Road corridors. This will require a consequent review and significant reduction of the extent of qualifying matters such as the Special Character area in these areas.</p>	<p>Continue discussions with Auckland Light Rail and ultimately up-zone land within the walkable catchment of Mt Eden Road, Dominion Road and Sandringham Road to appropriate high-density zones which provide for a mix of uses.</p> <p>Review and substantially reduce the extent of special character controls in this area.</p>
7	Other rapid transit corridors	<p>Waka Kotahi note that as the Airport to Botany and Eastern Busway do not have confirmed station locations, their walking catchments cannot be mapped.</p> <p>It is however unclear at what point in the planning process the council intends to map, and up-zone, their walkable catchments. For the sake of public transparency and confidence, the council should clarify how and when land will be up-zoned in these locations.</p>	<p>Publish a timeline and process for carrying out up-zoning post station location confirmation.</p>
8	Noise	<p>As Waka Kotahi has previously identified with Council, noise from transport corridors, including state highways, can have an adverse effect on the health and amenity of surrounding sensitive activities. The management of such effects is a joint task for the infrastructure authority and the developer</p>	<p>Include an overlay which requires sensitive activities within 100m of a state highway to provide mitigation for noise effects in accordance with Waka Kotahi standards.</p>

		<p>of the land use. Such effects can also give rise to reverse sensitivity issues for infrastructure providers.</p> <p>The amendment act provides for 'related provisions' such as an overlay or similar provisions to require protection of future receivers where land is to be up-zoned. These provisions can be based upon the model provisions contained in the Waka Kotahi guidelines which are available online. This would have no effect on density enabled by the future plan change.</p>	<p>Do not use the presence of state highway noise to prevent up-zoning of land that would otherwise be re-zoned under the amendment act or NPS-UD.</p>
9	<p>Enabling a mix of uses as well as intensification</p>	<p>To achieve sustainable growth and successful Transit Orientated Development (TOD), the council should ensure that new areas of residential intensification also enable the establishment of new supporting non-residential uses such as cafes, doctors and dairies. These uses are fundamental in these areas to achieving a well-function urban environment. THAB is the only zone used within walkable catchments, but mixed use zone would give similar level of development while allowing for a mix of uses including additional business uses. The combination of increased height limits and a mix of uses may broaden market viability of development and give effect to NPS-UD intentions. This is consistent with the Auckland Plan which seeks to repurpose and intensify centres and business areas, especially those in accessible locations.</p> <p>Alternatively, the council should urgently consider revising the activity rules and tables in the THAB and mixed use zones to enable these activities with minimal to no consenting barriers.</p> <p>This relates to the centres point above and there may be a requirement for more commercially zoned land due to population increases, particularly in convenient areas like around Fruitvale, Sturges Road and Sunnyvale stations.</p>	<p>Apply a wider suite of zones, including mixed use zone, an amended THAB zone or a new Transit Orientated Development zone in walking catchments around stations.</p>
10	<p>Height around stations and centres</p>	<p>The current proposal is for a uniform maximum height limit of six stories in these locations but the NPS-UD requirement is to enable 'at least' six stories. There is an opportunity for greater height and development potential in some areas,</p>	<p>Increase development capacity, including height limits, in the most accessible locations and avoid a blanket six-story control.</p>

		<p>particularly in the most accessible locations and the most accessible parts of walkable catchments. The application of this approach could include a greater height limit in:</p> <ul style="list-style-type: none"> <li>• The most accessible walkable catchments, for instance those catchments within the 15 or 25 percent most accessible parts of Auckland e.g. Parnell</li> <li>• Areas which fall within more than one walkable catchment e.g. Grafton, Newton and Eden Terrace</li> <li>• The first 200-400m from a station or centre, reducing down to six stories in the outer portion of the catchment.</li> </ul>	
11	THAB height	<p>It is unclear from the engagement material released whether THAB within the walkable catchments (minimum 6 storeys) will have a different height than THAB elsewhere (generally 5 storeys). Waka Kotahi would support a general height limit of 6 storeys for all THAB whether inside or outside walkable catchments.</p>	<p>Amend the general height limit of the THAB zone to 6 storeys.</p>
12	Industrial zones	<p>Noting that ‘Business land suitable for low density uses’ is a qualifying matter, there are a limited number of locations where retaining such a zoning may not be appropriate due to the presence of centres and stations. It appears that council’s proposal is to raise the height limit to six stories but not enable a greater mix of centre focused activities within these zones that would better support the rapid transit system and the up-zoned housing areas within the walkable catchment.</p> <p>Further, the change of use of such land is unlikely to make a material difference to the total amount of industrial land zoned and it would allow most existing commercial activities to continue while allowing for more intensive uses. Examples of these locations include Otahuhu and Sylvia Park.</p>	<p>Review existing industrial zoning in walkable catchments of stations and replace with mixed use zone where appropriate.</p>
13	Significant infrastructure constraints	<p>This qualifying matter is mentioned in the communications around the proposed changes, but no detail or extent has been provided.</p>	<p>Provide further information on the proposed approach to this qualifying matter and restrict use of zoning as a tool to implement it, particularly when in walkable catchments and highly accessible areas.</p>

		Infrastructure provision is a factor to consider in integrated planning but should only be used to the extent necessary and generally not through the use of low-density zoning. As per point 1 above, as a first principle, land should be zoned for its desired form of development with qualifying matters addressed by other means such as overlays. If this qualifying matter relates to three waters, then it is likely that such constraints are temporary in nature and other methods are available to control the rate of development (e.g. control of connections to Watercare’s network).	
14	Precincts	It is noted that the existing precincts are subject to further consideration. Many of these precincts contain triggers and assessments regarding transport upgrades and these should remain in place.	Involve Waka Kotahi in consideration of the approach to precincts Retain existing transport provisions in precincts.
15	Town centre heights	Some town centres indicate the removal of the special height overlay but the town centre zone doesn’t have a height limit.	Include new height variation controls for town centres, such as Ellerslie, where special character and associated height controls are being removed.
16	Detailed points	There are a number of site-specific issues which have been identified on the planning maps and these should be assessed.	<ul style="list-style-type: none"> <li>• Mangere East appears to have a high scoring for accessibility when it is located some distance from Middlemore Station</li> <li>• 51 sycamore Drive – spot zoning</li> <li>• Heights in and around Newmarket should be increased to the maximum possible under viewshafts. In particular the portion of the centre without view shafts should have its height variation control removed, as required by the NPS-UD. The council should also take the opportunity to increase the height variation control for the mixed use area between George Street and the Metro Centre to the maximum possible under the viewshafts, or to rezone it to Metropolitan Centre, to enable greater development and reflect its function as part of the Metro Centre.</li> </ul>

