



Feedback to the Howick Local Board on the Unitary Plan

18th June 2013

1.0 Background.

The Howick Local Boards commissioned SD4 to carry out a Fine Grain Analysis (FGA) on the draft Unitary Plan documents released in September 2012. SD4 completed the FGA Report in November 2012, and the Board accepted the FGA Reports at a 29th November 2012 Board Meeting. The Howick Board then made submissions to Auckland Council on the Sept 2012 draft.

SD4 has been provided with the following information:

1. Council officer notes from the main Howick Board Area community engagement meetings held during April and May.
2. Notes from the Howick Local Board Workshop on the 16th May to discuss its views on the Unitary Plan.
3. Auckland Council Unitary Plan Phase 2 Feedback Management Notes, summarising submissions from the Community since the 31st May Submissions cut-off.

The Howick Board have now asked SD4 to review the March 2013 Unitary Plan draft, to see:

1. *How the draft Unitary Plan meets the aspirations of the Howick Local Board*
2. *To review all of the community feedback and consider the property issues surrounding the feedback provided.*
3. *Provide property comments on aspects relevant to the Howick Local Board and the community feedback provided.*
4. *Consider further issues may have an impact on development activities within the Howick Board Area.*

This SD4 Report considers all this information and addresses the main issues raised, from a property perspective. It is anticipated that Council officers will supplement the information within this Report to discuss Community feedback not directly related to property matters affecting the Unitary Plan and its preparation.

This SD4 Report is prepared for a Local Board Member Unitary Plan Workshop on the 20th June. It is anticipated that the Board will then provide feedback to enable Council officers to write a the Final Unitary Plan Feedback Report.

2.0 SD4's comments on Design and Heritage Issues

In this sections below, SD4 will provide comment based on the concerns raised by the Howick Local board and community feedback. The comments provided by SD4 are its considered views from a property perspective, to the community feedback that has been raised. It is anticipated that the Howick Local Board will form its own views, based on the community feedback provided and SD4's comments.

2.1 Urban Design:

Community Concerns:

1. *That all new residential and business developments should be required to meet high standards of building design, quality and sustainability. However design and sustainability requirements should not impose costs that reduce housing affordability. Compliance with design guidelines should be required, as part of the Unitary Plan and local boards and the public should be consulted on the development of these design guidelines before adoption of guidelines.*
2. *There's an expectation that the plan will follow a design-led and place-based approach. This will provide the step change necessary to deliver the following Auckland Plan priorities:*
 - *Realise quality compact urban environments*
 - *Achieve good design in all development*
 - *Create enduring neighbourhoods, centres and business areas.*
3. *That regulatory urban design controls be included within the Unitary Plan, with the appropriate rule and assessment criteria structure to enable those rules to inform and influence development proposals and improve the quality of development in our neighbourhoods.*

SD4: (Comment on whether the new Unitary Plan (UP) addresses the Boards submission):

Yes: The entire draft Unitary Plan has a strong urban design focus, in line with your submission. (eg Section 2.2 of the Text: "Enabling Quality Urban Growth"). SD4 recommend that the Howick Board continue to support the urban design led approach, and continue mentioning this to Council in it's feedback.

2.2 Infrastructure before development:

Community Concerns:

That the Unitary Plan should have a number of triggers in place before the additional development potential provided by the plan can be uplifted, including:

1. *All necessary infrastructures to handle increased population (including transport, water, wastewater, and community and social infrastructure) is in place before new development, over and above existing plan provisions, is permitted.*
2. *Providing, where appropriate, for a staged approach to development of town and local centres.*

SD4: This has not really been satisfied; Section 3.1.1 of the Text covers Infrastructure. Our interpretation on reading this text is that it is light or even silent on ensuring the infrastructure is provided prior to development commencing.

SD4 acknowledges that this is a difficult issue to manage economically, as the areas where Council may wish to see intensification would need to have large amounts of funding applied to infrastructure upgrades, after which there maybe uncertainty over whether the market wishes to intensify in the Council chosen areas.

2.3 Accessory Units and Minor Dwellings

Community Concerns:

That accessory units or minor dwellings be provided as a permitted activity, noting that good design outcomes will still need to be provided for these buildings.

SD4: Part 4 Rules 4.3.1, 3.3 allows the conversion of a dwelling into two units. Other than this the UP does not allow minor dwellings or accessory units.

2.4 Single House Zone Development issues

Community Concerns:

The Single Housing Zone has 1:500 density controls for all sections. What are SD4's comments on this zone relative to the Howick Board area, especially comments on whether the single house zone has been applied in the right areas?

SD4: The new Unitary Plan has moved from nearly 100 residential zones across Auckland to 5, and within the urban areas there are only 3 zones. With only 3 zones, there will be changes to some of the previous underlying zoning rules. There were parts of Howick that had 1:700m² site size controls which have been reduced to 1:500, eg Cockle Bay. Likewise there are other areas who with a density of 1:500 have a more restrictive zoning than their previous 1:400 density allowance.

SD4 are supportive of the Single House zone in Mellons Bay, Howick north of the Village and Cockle Bay, to the extent as shown on the Planning Maps.

SD4 are also supportive of the Single House zoning in the Chapel Rd area from about 100-150m north of Dannemora Drive. This area has had housing developed during the 1990's on slightly larger sections than the more recent subdivisions, and the Single House zone is considered suitable.

SD4 is of the view that the single house zone in the Farm Cove area, effectively from the Marina through to Manor Park, is too restrictive. SD4 supports this entire area being zoned Mixed Housing. Strong urban design controls will ensure a good quality of re-development in the earlier developed areas. This re-development is likely to take place in the latter stages of the 20-30 years Unitary Plan timeline.

SD4 are of the view that the entire Tiraumea Drive Peninsula should be mixed housing, (excepting the area shown as Terrace Housing and Apartment Buildings), to support the AMETI Transport Hub investment at Pakuranga Town Centre.

2.5 Mixed Housing Zone Development issues

Community Concerns:

The Mixed Housing Zone has 1:300 density controls for sections below 1,200m² and no density controls for sites over 1,200m², as long as these sites have at least a 20m front boundary length. The zone has an 8m height limit, although with a RC application, the max height can be increased to 10m, as long as the height to boundary controls are met. There has been a lot of public feedback on the Mixed housing Zone. What is SD4's comment to all the public feedback provided?

SD4: The Mixed Housing Zone rules are similar to earlier draft rules provided to Local Boards, in September 2012. SD4 is supportive of the planning rules that apply to this zone.

The Auckland Plan is based on a platform of substantial existing urban area intensification, to reduce the amount of greenfield urban sprawl. The main issue affecting neighbor amenity is the height to boundary rules. The height to boundary rules within the new Unitary Plan are very similar to most of the earlier District Plan Rules. i.e whilst Auckland is intensifying, the height to boundary rules have not changed and are far more restrictive than most other large international cities.

As for heights, most of the Auckland areas had a height limit of 8-9m, under previous zoning. This has been restricted to 8m in the Mixed Housing zone, as of right. If a developer has a site greater than 1,200m², there is the possibility of an increase of height to 10m, but as long as all the height to boundary controls are satisfied. SD4 is supportive of this rule, and on balance a relatively neutral position. SD4 notes that many in the property community were advocating more aggressive height to boundary controls, more in line with most of the Australian Cities. The draft Unitary Plan has stayed very conservative on height to boundary and most of the yard setback rules.

As for density controls, SD4 is supportive of the 1,200 m² site size for no density controls to apply. This provision has the potential to assist with providing more affordable housing options to the market. Some in the property industry were calling for the density restrictions to be relaxed from sites above 800-1,000m². SD4 is of the view that the 1,200m² is about right. The site coverage of 50% is also about right, allowing increased site coverage than the current 35-40%, but still substantially below the 60-70% allowed as of right in many Australian cities.

The 20m front boundary dimension is sensible and will allow for a good urban design solution to be provided. There are a number of large rear Lot sections that are in excess of 1,200m² but with minimal street frontage. SD4 recommend that discretionary activity status be applied to 1,200m² + sections applying for the relaxed mixed housing controls, that don't have sufficient frontage. Strong urban design criteria must apply to such discretionary developments.

2.6 Terrace House and Apartment Building Zone Development Issues

Community Concerns:

The Terrace House and Apartment Building (THAB) Zone has been provided for a transition to higher density within the town centre areas. SD4 provides comments in section 3 of the suitability of the locations of the proposed THAB housing within the Howick Board area. In this section, we will comment on the actual Rules that will apply for this THAB zone.

SD4: The THAB Zone rules are similar to earlier draft rules provided to Local Boards. zone. The THAB zoning has been provided to the south of the Howick village, surrounding Highland Park and the Pakuranga centres, and adjacent the Botany Metro Centre. The 12m height limits and density restriction removals are realistic and should provide substantial intensification opportunities in the desired locations. Maintaining strong urban design controls will be essential.

The Auckland Council has carried over most of the apartment minimum sizing rules, that the old Auckland City Council incorporated in 2005-2006, after community concern over “shoebox apartments”. SD4 is of the view that the minimum apartment sizes are sensible and will provide good size medium density residential accommodation, at sizes supported by most in the property industry.

Managing the interface between the THAB and Mixed housing zone will be important, ensuring that the more restrictive height to boundary rules apply at the interfaces.

2.7 Heritage and Historic Character Protection

Community Concerns:

There has been substantial community interest in heritage and character area preservation. What comments does SD4 have on the submissions on heritage and character?

SD4: The Local Board has already generated a list of buildings, structures and sites that have the potential to be heritage scheduled. SD4 is supportive of this approach, which should be continued.

Note: Development entities are not opposed to scheduling noteworthy properties or trees / natural landscapes. Their main concern is heritage concerns being raised after the developer has purchased a property that they had intended to develop and / or after substantial time has been spent designing new concepts on previously un-scheduled properties.

3.0 SD4 comments on the Howick Board Intensification Areas

There has been public feedback and interest in town centre development and the property opportunities of the AMETI project. In the section below SD4 provides it's professional judgement on the development opportunities of all the town centres, the Bucklands Beach Peninsula and a larger focus on properties adjoining AMETI and the Pakuranga Town Centre.

3.1 Howick Village Centre

The Howick Village is a very attractive town centre. There is further intensification opportunity within and to the South of the town centre. SD4 does not see sufficient benefit in intensifying existing Res7 areas to the North of the Village and supports its proposed single house zoning. There's good intensification opportunities, using the mixed housing and terrace house and apartment zoning, south of the town centre.

3.2 Ormiston Town Centre

Flat Bush / Ormiston has been subject to substantial Manukau City Council planning guidance during the last 15 years. Plan Change 20 initiated by the Manukau City Council had involved all the main stakeholders and seemed sensible. SD4 advocate and support all the principals of Plan Change 20 being adopted in the UP.

3.3 Botany Metro Centre

Residential intensification of the Botany Town Centre will be highly dependant on the willingness of the retail property owners to include residential intensification on their retail land holdings. SD4 believe it is inevitable that apartment development will eventuate, as the retail shopping centre and its entertainment precinct will provide an increasing amenity attractiveness to future apartment occupiers.

3.4 Bucklands Beach Peninsula

SD4 is supportive of the entire peninsula being zoned mixed housing. Bucklands Beach and the Eastern beaches have already had substantial 2-3 level intensification. With strong urban design controls, the proposed mixed housing typology zoning could provide many more quality dwellings in the next 20-30 years. Musick Point is a jewel and should stay development free.

3.5 Highland Park Town Centre

The Highland Park shopping area provides a reasonable town centre intensification opportunity. Master-planning will need to consider how to create an attractive town centre, as the existing town centre has only modest residential appeal. With good master-planning (similar to that conducted by Council for Pakuranga Town Centre), Highland Park could be developed into an attractive town centre, including medium density residential. The timing for the intensification will likely be in the later years of the Auckland Plan, ie in 20-30 years time.

3.6 The property opportunities and implications of the AMETI Project

The AMETI project constitutes a significant investment that aims to improve accessibility to eastern parts of Auckland. The improved accessibility is of benefit to properties surrounding the main transport “drop-off nodes”, however being on a transport corridor is not yet a critical key driver in Auckland residential occupier preferences.

Property occupiers like to be near transport nodes, however being immediately on a transport line has many noise and outlook concerns for occupiers. This applies equally for rail lines, bus corridors and main roadways.

SD4 therefore sees excellent intensification opportunities within a 400-800m radius of the Pakuranga AMETI node, especially as this area will likely benefit from attractive town centre amenity improvements.

Providing terrace house and apartment zoning directly on the transport route is not seen as market attractive. It has been reported that the lowest desirability of properties in Pakuranga (and thus property values) is for properties directly on the busy Pakuranga road. Residential occupiers just do not desire living directly on the busy transport route, with the noise, traffic fumes and minimal outlook amenity.

3.7 Pakuranga Town Centre

The Pakuranga Town Centre is immediately adjacent to the AMETI corridor. SD4 is supportive of substantial re-development of large areas near the centre. Auckland Council and the Howick Local Board have been involved in master-planning this area for the last 12 months. SD4 support the master-planning process, which should be continued until the Master-Plan is completed and incorporated as an Area or Precinct Plan.

Much of the Pakuranga neighbourhood has low to average housing quality, relative to other housing within the Howick Ward. Using good urban design guidelines, quality intensification within the mixed typology zone should provide a good volume of further housing.

Relative to the Draft Unitary Plan Pakuranga Planning Maps, SD4 makes the following comments and suggestions:

- The master-planning being carried out provide the town centre with enhanced stronger green connections to the attractive waterfront foreshore and an extension of the Rotary Walkway. This is strongly supported.
- The higher density terrace house and apartment building (THAB) zone to the north of Pakuranga Rd is not supported. SD4 recommend that this entire area be zoned mixed housing. This will encourage quality redevelopment of the lower improvement value properties, however the areas which already have substantial improvements will likely remain unchanged for many years.
- SD4 recommend that Council officials continue developing the master-plan for the town centre surrounds on a fine grained basis, taking account of the individual nuances of every street and street block.

- Consideration should be made to improving connectivity to all areas of the peninsula by eliminating many of the cul-de-sacs. This can be done by strategic Council purchasing of a few selected properties. A local targeted rate can be applied to pay for roading and landscape improvements in the area. This will benefit the value of all properties in the area, the existing properties, and the to be developed properties.
- SD4 is supportive of suggestions to enlarge the actual town centre zoned area to incorporate Cortina Place and connect Matson Rd with William Roberts Rd. The enlarged town centre could also incorporate all the properties on the west side of William Roberts Rd.
- With connectivity improvements, SD4 is of the view that the Dale Crescent area's proximity to the Town Centre, warrants a terrace house and apartment zone for this area. (Whilst taking account of the over-head power lines affecting some of the properties).
- The remainder of the peninsula should be zoned mixed housing, including all of Tiraumea Drive to the edge of the peninsula. The mixed housing zone should include all of the properties fronting Pakuranga Rd west of Ti Rakau Drive, all the way to Panmure Bridge.
- The final thoughts are on the proposed height limits for the Pakuranga town centre. To ensure sufficient population increases near the Pakuranga Town Centre to support the massive AMETI investment, the suggested predominant down-scaling of many parts of the Peninsula from the draft District Plan should be compensated within the Town Centre. It will be this area that will have best pedestrian access to the substantial AMETI public transport improvements. With the core part of the town centre recently purchased by a development entity, the development of a quality master-plan is suggested for this area. A reverse sensitivity of adjoining properties will likely show that an increasing of the height from 8 storeys to 12-16 storeys in the core of the town centre will likely have minimal real adverse affects on adjoining properties. This could be a WIN-WIN outcome for all parties. Reduced density in areas where there has been substantial opposition to the terrace housing and apartment building zone, and increasing density to an area where there are greater transport benefits. The increased population in the town centre will likely lead to further improved shopping and entertainment amenity, benefitting the entire neighbourhood.

4.0 SD4's comments on further areas of interest to Howick

This section looks at four issues that will have an impact on Howick's development intensification.

1. Auckland Council's Capacity for Growth Study
2. Auckland Council's Unitary Plan 3D Modelling videos
3. The Howick Area implications of the Housing Accord
4. Auckland Council's requested early decisions on heights in intensified areas

4.1 SD4's comments on AC's Capacity for Growth Study 2012 (CfGS12), as it affects Howick

In early April, AC issued two background Technical Reports, TR2013/009 and 2013/010, which can be found on the Web at:

<http://www.aucklandcouncil.govt.nz/EN/PLANSPOLICIESPROJECTS/REPORTS/TECHNICALPUBLICATIONS/Pages/home.aspx#capacity>

The CfGS12 states in its Introduction on Page 3:

“The Capacity for Growth Study assesses the ability of residential and business land within Auckland to accommodate growth”.

So how well does the CfGS12 assess the capacity for growth in Howick?

Appendix C, Map Series 2, Map G shows the Map for Howick:

<http://www.aucklandcouncil.govt.nz/EN/planspoliciesprojects/reports/technicalpublications/Documents/tr2013010series2mapg.pdf>

The following are some of the key findings of SD4's review of the above Map:

The 10 largest “Residential Vacant” and “Residential Vacant Potential & Infill” development sites in the Howick Local Board area are (according to the CfGS12):

- St Kents College
- Pakuranga Golf Club
- Pakuranga Park Retirement Village
- Pakuranga United Rugby Club's Bell Park
- Estuary Views in Cockle Bay
- Kings Plant Barn site on Botany Rd
- The Howick Club site at 107 Botany Rd
- The Howick Baptist Village at 139 Union Rd
- Our Lady Star of the Sea School in Oakridge Way
- A series of high value sites (many with large houses) on the cliff-top on Bleakhouse Bay Rd

All the above sites are shown as residential vacant or residential vacant potential development sites.

SD4's detailed FGA analysis showed greenfield capacity of 13,000+ dwellings (all in Flat Bush and Botany) and 12,000+ urban infill capacity.

SD4's professional judgement on the CfGS12 is that:

- AC's CfGS12 Report is a computer driven exercise, with practically no reality / sense checking "out in the field". i.e. a check on: "Does this make sense"?
- AC's CfGS12 Reporting has counted most private schools, churches, retirement facilities and some parks in its sites able to be redeveloped.
- All sites that are "under-developed" (incl the schools, churches, parks mentioned above) are assumed by the CfGS12 analysis to be redeveloped to 100% of their maximum potential, within the 30 year period.
- Much of the CfGS12 Methodology and Background structuring is sound, it is the sense checking of excluding schools, churches etc; assessing the likely capacity utilization and development chance that has yet to be completed.

The end result for Howick, is that the CfGS12 is likely to have over-estimated the infill development opportunities, especially all of the Schools and rest homes in some areas, whilst not sufficiently considering intensification opportunity in other areas. SD4's FGA addresses this concern. SD4 recommends that the Howick Board utilize the FGA information when the Area Plan for the Howick Board Area is completed.

4.2 SD4's comments on AC's Unitary Plan 3D modeling videos, as it affects Howick

As part of the Growth Study work, AC has also just released a series of Unitary Plan 3D modeling videos. Instead of the normal Council process of posting these on the Council website so that they could be clearly viewed by all, they are tucked away on "YouTube", as below:

<http://www.youtube.com/watch?v=4QjJZzCB3Bk&list=PLNiuqKCzobSwwvxhdHPqawQy4GPEFW8R9&index=2>

So having reviewed the video simulations for the Botany Metro Centre, SD4 provides the following comments: (there are no video simulations for other Howick town centres).

- The base information provided for the 3D modeling is sound. It provides very accurate 3D building shapes of all the existing buildings in the area.
- The 3D views are rotated across each of the town centres, the main features are marked and it is very clear to get a good context of each centre.
- The buildings and sites of historic character are clearly signposted before the growth projections commence.
- The manner in which under-developed sites are prioritized for redevelopment within each centre looks promising.
- The new building massing of each of the chosen redevelopment sites appears realistic.
- This is where the good news stops. The extent of the re-development shown in three 10 year time periods in a number of centres is too high.
- SD4 carried out a detailed Fine Grained Analysis for Howick in Nov 2012, which included consideration of the likely apartment take-up for the Botany town centre with a re-zoning to an 18 storey height limit. The SD4 FGA Analysis showed the total terrace house and apartment numbers within the Botany Town Centre could be approx. 1750 dwellings over the 30 year period.
- The AC 3D video for Botany show dwelling uptake of at least 2-3 times what SD4 believes is reasonable in the projected time frame. SD4 do not believe this is realistic.

4.3 The Howick Area Implications of the Housing Accord

1. *What are the implications of the Govt's Housing Accord on the Howick Local Board?*

SD4: The purpose of the Housing Accord / Act is to enhance housing affordability by facilitating an increase in land and housing supply in certain regions or districts, identified as having housing supply and affordability issues.

Central Govt has ratified the Housing Accord, and for the Accord to take effect in Auckland, Auckland Council needs to do the same at the time the new Unitary Plan is notified, likely in Sept 2013.

The Housing accord covers greenfield and brownfield developments. Both greenfield and brownfield will affect the Howick area. The accord will cover brownfield intensification projects upto a maximum of 6 storeys in height. The intention is to apply the Housing Accord provisions in areas where there are substantial housing affordability problems. The Howick Ward is likely to be on the "fringes" of suffering from affordability problems.

The greenfield provisions are primarily for areas not already zoned residential or those not covered by a structure plan. This will thus principally cover areas outside of the old MUL and within the RUB.

In Auckland, the intention is for the Unitary Plan "to take effect" from Sept 2013, when development applications are submitted in accordance with the Housing Accord processes.

The Housing Accord will be for generally larger scale projects. Council can decide whether to notify the project, if the activity's adverse effects are considered more than minor, to the owners of the land adjoining the land subject to the application.

There is a huge amount of detail around the notification process, timescales, hearings etc. All proposals will be subject to full scrutiny, however there is a requirement to provide a consenting outcome within 6 months.

Conclusion: The main issue for the Howick Board, is that after the Housing Accord becomes operational (from Sept 2013), there is the potential that a land owner will use the Housing Accord Provisions to apply for Consent using the new notified Unitary Plan Rules. It is likely that only medium-larger projects will apply, although the initial project applications will likely set a precedent for future applications. The urban intensification in and around the Pakuranga town centre could be one of the areas that a developer may seek to accelerate approvals by using the Housing Accord provisions.

4.4 Auckland Council early decisions on Heights in intensified areas

At an Auckland Council meeting attended by SD4 and other Local Board Advisory Consultants, on 27th May 2013, The Auckland Council Planning Manager Penny Pirrit, advised that Mayor Len Brown has just initiated a 19th June Workshop to discuss key issues of the Unitary Plan, so that these could be dealt with “early”, with an early public announcement. The main issues centred around height within town centres and heights within the apartment / terrace zones. Specifically which areas should have which height applied?

Up until now Council Planners have provided a classification to various town centres, calling them Principal Centres, Town Centres, Neighbourhood Centres etc. Council Planners have classified each Centre and then applied the relevant height to each depending on their classification. The heights have also then been applied in a general uniform fashion across each centre, excepting height buffering at the interface to residential areas.

Penny Pirrit relayed that it was likely that Council Planners would be applying greater discretion to the application of the heights within various town centres. i.e. There may be height variances within a centre, if there is a good reason for doing so. Some heights may be increased, some heights may decrease.

The height in the Botany Metro Centre is proposed at 72.5m max, or 18 storeys. The Apartment zone adjoining the Town Centre is proposed at 4-6 storey. SD4 recommend that the 18 storeys is maintained.

Ormiston Town Centre is proposed at 8 storeys and Highland Park is proposed at 6 storeys. SD4 is comfortable with these proposed heights.

Pakuranga town centre is also proposed at 8 storeys. With its location adjacent to a major AMETI Transit Hub, SD4 consider that the Pakuranga town centre has the opportunity to be come a TOD (Transit oriented development). SD4 is of the view that Pakuranga Town Centre could justify height of 12-16 storeys at its centre, with setbacks in line with other similar metro centre setbacks.

Specific overlay provisions are proposed for the Howick town centre. SD4 is supportive of a 9-12m height limit in this area.

It is important that the Howick Board take a view on all the proposed heights within the Local Board area, prior to the 19th June workshops. Mayor Brown intends to invite the Local Board Chairmen to this Workshop.