

Feedback from Waka Kotahi on Auckland Council's draft response to the National Policy Statement on Urban Development 2020 and the Resource Management (Enabling Housing Supply and Other Matters) amendment Act 2021

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This is feedback on Auckland Council's (**Council**) draft approach to implementing the National Policy Statement on Urban Development 2020 (**NPS-UD**) and the Medium Density Residential Standards (**MDRS**) under the Resource Management (Enabling Housing Supply and Other Matters) amendment Act 2021 (**amendment act**).

Waka Kotahi role and responsibilities

Waka Kotahi is a Crown Entity established by Section 93 of the Land Transport Management Act 2003 (**LTMA**). The objective of Waka Kotahi is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. Waka Kotahi roles and responsibilities include:

- Managing the State Highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the system.
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

Waka Kotahi interest in this draft proposal and the future Plan Change stems from its role as:

- A transport investor to maximise effective, efficient and strategic returns for New Zealand.
- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system to shape smart efficient, safe and responsible transport choices.

- The manager of the State Highway system and its responsibility to deliver efficient, safe and responsible highway solutions for customers.

Government Policy Statement on Land Transport.

Waka Kotahi also has a role in giving effect to the Government Policy Statement on Land Transport (**GPS**). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next 10 years. The four strategic priorities of the GPS 2021 are safety, better travel options, climate change and improving freight connections. A key theme of the GPS is integrating land use, transport planning and delivery. Land use planning has a significant impact on transport policy, infrastructure and services provision, and vice versa. Once development has happened, it has a long-term impact on transport. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. For these reasons, Waka Kotahi seeks full utilisation of the tools available to Council to enable development in the most accessible urban areas.

Waka Kotahi views on proposal

Waka Kotahi supports planned development in appropriate areas and seeks to assist Council in implementing the Government's direction on enabling development capacity. From a review of the documents published to date, it is evident that Council has made good progress to this end and is in a strong position to have a finalised proposal for notification by August.

In recognising the progress to date and the limited time available to council to produce a draft, Waka Kotahi have identified a number of areas where the approach to up-zoning in appropriate areas should be expanded and refined. These are detailed in the attached table but can be summarised as one key theme, which is the use of zoning to give effect to government direction. It appears that the approach to the large number of qualifying matters proposed is to retain low density zoning instead of a limited use of overlays. Conversely, where up-zoning is applied within walkable catchments of centres and stations, it is not used to the extent anticipated by the NPS-UD and a 'do minimum' approach of only residential development up to six stories is provided for. Similarly, up-zoning has only been applied to walkable catchments while other highly accessible areas have not been included. Cumulatively, this approach will result in a substantial loss of development capacity, particularly in the most accessible areas. In order to improve the integration of transport and landuse and give effect to government direction, this approach, particularly in the Isthmus where there are extensive areas of Special Character proposed, will need to be revised.

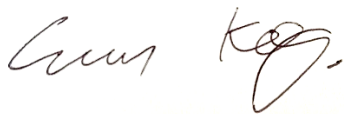
Changes sought

Waka Kotahi supports the work Council has undertaken to date but seeks amendments to assist Council in meeting its obligations under the NPS-UD and amendment act as outlined in Table 1 attached. Note that the feedback provided is only based on the published documents and further input will be required when changes are proposed to the Auckland Unitary Plan text.

Further assistance

Waka Kotahi wishes to work with Council to implement the changes outlined in these comments and can provide further information or assistance as required.

Signature of person authorised to sign on behalf of Submitter:

A handwritten signature in black ink, appearing to read 'Evan Keating', written over a horizontal yellow line.

Evan Keating

Principal Planner, Waka Kotahi

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