

Draft Auckland Unitary Plan (March 2013)

Recommendations

It is recommended that the Board:

- i. Receives this report.
- ii. Delegates authority to the General Manager, Strategy and Planning to finalise and sign-off on Auckland Transport's comments on the draft Auckland Unitary Plan as set out in Table 1 and following any further changes or points the Board wishes to make.

Background

This report presents AT's feedback on the draft Auckland Unitary Plan for approval and sets out the process going forward.

The draft Auckland Unitary Plan (AUP) was published for comment in March 2013. While AT had provided input to the transport related sections of the AUP, this was the first opportunity that AT has had to review the AUP in its entirety and hence to understand the application of the different parts of the AUP and how well the various provisions have been integrated to provide for AT's day to day operations and capital works programme.

The Strategy and Planning Department has engaged with staff across the organisation and has been working closely with NZTA as well as other organisations (e.g. KiwiRail and Network Utility Operators) on common issues.

Strategic context

Auckland's Integrated Transport Programme (ITP) sets the 30 year investment programme to meet the transport priorities outlined in the Auckland Plan. The main strategic directions contained in the ITP are to manage transport as One System and optimise transport investment through the four stage intervention process:

- To maintain, operate and renew infrastructure optimally
- To make better use of assets
- To manage demand efficiently and safely
- To invest in new infrastructure, services and technology

The ITP has been approved by the AT Board, endorsed by AC and supported as a strategy by the NZTA Board.

To support the strategic direction contained in the ITP, the AUP should provide an enabling regulatory framework that minimises the costs and time delays in delivering AT's business as usual activities and improvements and in providing infrastructure and services to meet Auckland's burgeoning growth. The environmental controls provided in the AUP will, therefore, determine the relative levels of service that will ultimately need to be funded.

Proposed feedback

AT supports the overall direction set by the AUP for delivering the Auckland Plan.

The AUP sets out the statutory framework within which AT carries out its responsibilities as Road Controlling Authority and as a requiring authority. There are three broad areas where the AUP will have a fundamental impact on AT's ability to carry out its functions:

- What AT does - the objectives, policies and rules contained in the AUP sets the planning framework and rules that AT must work within in terms of carrying out its day-to-day business and capital projects;
- What others do - it will also determine how other land uses and activities are developed which rely on the adjacent or future transport network, setting out the framework and rules all other parties must work within. The AUP will, therefore, have a direct impact and potentially significant implications for AT in terms of its ability to deliver and operate the transport system; and
- Supporting growth - it will also define the location, scale and timing of future urban growth and therefore impacts on AT's future investment programme.

AC has actively engaged with AT in the development of the rules which govern AT's activities carried out in the road corridor. This engagement process and close working relationship has resulted in a permissive activity status which is fully supported by AT. AT would like to continue this positive engagement process with AC to work through the details of the provisions that will result in a fully enabling planning framework.

The key issue has been identifying the impact of the development controls and overlays which, where they apply, will impose additional restrictions over AT activities carried out in the road corridor.

A summary of the key issues, implications and suggested responses is indicated in Table 1 below.

Table 1 – Summary of key draft Unitary Plan issues and proposed feedback

Key Issues	AT Implications	Suggested Responses
<p>AT's day-to-day (operation and maintenance) activities are compromised by some of the additional controls and standards</p> <p>For other activities in the road, network utility structures and activities are permissive and there is unclear distinction in provisions applying to AT, for example, development controls such as height limits for structures like bus shelters, street lights</p>	<p>Additional compliance costs and time delays to deliver operation and maintenance works including greater consent requirements (AT budget in the order of \$2M/day for maintenance & renewal work). For example, if AUP controls on managing sensitive landscape areas were applied to Orere Point Rd, additional consenting costs for maintenance activities estimated at \$30,000/yr (subject to more detailed analysis) compared to existing maintenance costs of approx. \$12,000.</p>	<p>For selected controls and standards AT will be seeking exemption or amendments to enable work to occur within reasonable parameters.</p> <p>Greater delineation of rules between AT works and other network utility operators for works involving the road.</p>
<p>Potential for some of the AUP provisions to impose additional costs on capital projects to achieve prescribed standards</p>	<p>Provision of new or upgrading of existing infrastructure is subject to higher standards than is currently required. For example, initial cost estimates for Glenvar Road (servicing the Long Bay redevelopment) indicates an additional \$3 million in capital cost to meet enhanced stormwater standards when compared to meeting the standards of the existing regime (subject to more detailed analysis of options).</p>	<p>For key provisions (e.g. stormwater and land disturbance) to include standards that recognise the functional aspects of linear infrastructure and that include standards commensurate with the level of effects. The AT response will be aligned with NZTA which has common concerns.</p>
<p>In some areas and locations (e.g. rail stations and along key bus routes), there is potential to improve integration between land use patterns provided for in the Unitary Plan zoning and investment in public transport in existing urban areas</p>	<p>Public transport patronage and overall network efficiency not optimised. Cost to service growth, having the potential to impact on public transport travel targets.</p>	<p>Seek rationale for land use zoning patterns in relation to the transport network and re-examine zoning patterns with AC along main transport corridors.</p>
<p>In the relevant sections of the AUP there is a lack of explicit recognition to protect AT's interests in managing the transport network</p>	<p>By legislation, AT manages and controls the road and is Road Controlling Authority for local roads. AT is not specifically identified in the plan as needing to be consulted or involved in land development processes or consent processes that can impact on the use and management of the transport network</p>	<p>Identify where formal recognition of AT as part of planning consultation processes is required in the AUP e.g. as an affected party versus relying on the existing service level agreement between AC and AT for consents</p>
<p>Supporting growth – in parts of the AUP such as the subdivision requirements, there is potential to improve processes by recognising the need to align funding and programming of transport infrastructure / services to support areas of greenfield growth</p>	<p>Potentially uncoordinated release of land for urban development resulting in cost of reactive response from infrastructure providers.</p>	<p>In the relevant parts of the AUP to include greater emphasis on the forward planning requirements of infrastructure providers and ensure these requirements are incorporated into planning processes.</p>

Next steps

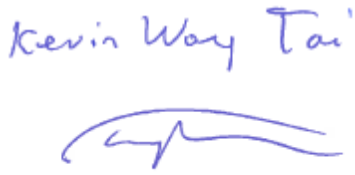

Feedback to AC on the draft AUP is due by 31 May. Staff will prepare detailed feedback based on the points listed in Table 1 and incorporating any additional points or changes required by the Board.

AT will continue to work with AC on follow-up actions required as a result of the feedback points raised to ensure our shared objectives as set out in the Auckland Plan are delivered. AC is planning to seek approval to notify the proposed AUP in September 2013 for formal submissions.

Attachments

Number	Description
1	Overview information on the AUP issued by AC

Document Ownership

Prepared by	Kevin Wong-Toi Christina Robertson Unitary Plan Adviser/Transport Land Use Integration Plans Leader	
Recommended by	Peter Clark General Manager Strategy and Planning	
Approved for Submission	David Warburton Chief Executive	