

Presentation to: Auckland Council Planning Committee

From: Orakei Local Board (T. Churton / S. Milne presenting)

## **OPPOSITION to The Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill**

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**Government says** - “The Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill is designed to improve housing supply in New Zealand’s five largest cities by speeding up implementation of the National Policy Statement on Urban Development (NPS-UD) and enabling more medium density homes”.  
(source: Government fact sheet 19/10/21)

**Orakei Local Board says** - “This Bill is not fit for purpose. It is unnecessary and the negative impacts of it grossly outweigh the positive. The Government should focus separately on providing infrastructure funding support instead of housing density planning.”

### **1. The AUP already delivers sufficient supply of housing for short, medium, and long term, including provisions for housing in centre and fringe areas.**

- Plan-enabled housing capacity – (supply under current AUP settings) - clearly meets the forecast demand of approximately 320,000 over the next 30 years, and could meet higher demand:
  - i. At least 909k net redevelopment opportunities exist now
  - ii. 840k ~ 1.4m redevelopments are considered commercially feasible
  - iii. 300k ~ 320k are expected to be realised over the next 30 years.
  - iv. Projections allow for 15-20% greater demand possibilities: Projected short-term demand (2020-2023) 45,000 / projected medium demand (2024-2031) 98,000 / projected long-term demand (2032-2051) 239,000

*(Source: NPS Policy Statement on Urban development- Jacques Victor – GM Auckland Plan Strategy & Research presentation to Planning Committee, 26 May, and 2 June 2021)*

### **2. The NPS UD coupled with the new Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill (the Bill) will not improve affordability by increasing supply.**

- Are the prices of new dwellings actually affordable to target/specific population groups (e.g., intermediate market households / first home buyers)?  
*No, suppliers deliver dwellings based on maximum profitability*
- Does sufficient feasible capacity actually translate into better affordability for households?  
*No, Intermediate Housing Market are outbid from the competitive market*
- Does affordability improve because of new dwellings entering the market, greater land release, or development opportunities?  
*No, affordability is also affected by income or access to affordable houses*

*(Source: NPS Policy Statement on Urban development- Jacques Victor – GM Auckland Plan Strategy & Research presentation to Planning Committee, 26 May, and 2 June 2021)*

3. **Special Character Residential Areas (SCAR) in Orakei (*and across Auckland*) must be kept because they do not impede local housing capacity or regional housing capacity\*, and they add to the area's amenity, inter-generational amenity, and economic attraction.**

- 90.33% of Orakei's residential land is THAB, MHU and MHS. Of all the single house zoned land in Auckland, only 2.13% is within Orakei. Orakei already provides well for greater density and height to meet short-, medium- and long-term supply (by contrast all Auckland THAB MHU and MHS is at 67%).
- Almost all SCAR in Orakei is outside MHS, MHU and THAB zones. Only 3.61% of residential land Auckland-wide has SCAR. Ensuring SCAR is qualifying matter will not impede capacity.
- Developers are already achieving three storeys in MHS zones within the 8/9m height standard. They often dig into the ground and use flat roof types.
- MHU and THAB zones account for almost 27% of all Orakei residential land by contrast to around 20% for Auckland as a whole. Orakei already provides well for three storeys or more.
- MHU and MHS zones account for almost 85% of all Orakei residential land (OLB) and up to three dwellings are permitted. (*see map attached*)

Regarding delivery of housing supply through 'density', the MDRS proposed by the Bill will not achieve its purpose any better. The Bill only achieves more permissive MDRS standards that enable development without consent, which might otherwise have required consent under the AUP (by contrast, 60% for all Auckland).

(\*Source: Auckland Council Unitary Plan Base zone layer – data extract July 2021 – RIMU: Research and Evaluation Unit – Chad Hu, Senior Spatial Analyst)

4. **To get a 'well-functioning urban environment' as required by the NPS UD, we need a more design-led approach to development than the proposed new Medium Density Residential Standards (MDRS) in the Bill. Consenting is a critical component for ensuring design and amenity outcomes.**

- Developer flexibility should not be promoted over community certainty for amenity outcomes.
- Applying the Bill's MDRS across all MHUrban, MHSurban and Single House zoned areas is an indiscriminate 'one-size fits all' approach, is counter to the revised NPS-UD policy direction and makes a nonsense of it.
- The proposed capacity enabled by the MDRS is similar to what can be achieved under the current AUP rules (for example, 3 dwellings per site in MHS and MHU).
  - i. Changes to several key activities are indiscriminate – such as height to boundary from 3m to 6m as becoming permitted – meaning significant negative effects on urban development citywide that outweigh any capacity benefit.
  - ii. For example - Daylight, height to boundary (north south): This is an example of the difference that could/should be applied for northern and southern boundaries. The proposed 6m and 60 degrees might be acceptable for some northern boundaries in some locations but not all, and certainly not for MHS and SHZ areas or SCAR areas.
- The Bill's modification of policy 3 (d) of the NPS-UD (copied - italics below) might be appropriate, only because the greater development intensity is (at least) focused on centres throughout a city. The Council and community ('we') can make appropriate zoning and development control provisions when giving effect to this revised policy.

- We can do that in line with the NPS-UD’s focus on ‘well-functioning urban environments’ to ensure special character areas are qualifying matters without impeding housing supply, and ensure our city still derives broader economic benefits that come from managed character environments.
- Retaining consenting process ensures design-led outcomes from medium density development.

*The Bill’s revised NPS-UD policy 3 (d) is: “within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and density of urban form commensurate with the level of commercial activities and community centres*

Presented: 4<sup>th</sup> November 2021

On behalf of the Orakei Local Board

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**Scott Milne** – Chair, OLB

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**Troy Churton** – Planning portfolio lead – OLB