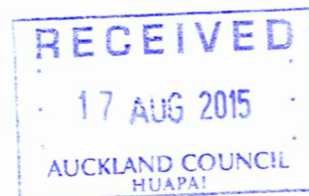




Auckland Council
Private Bag 92-300
Auckland 1142

17th August 2015



Dear Sirs

Re: Land Supply Strategy

The Association has received many comments from members and the general public over the 'Draft Urban land Supply Strategy'.

The comments have been around proposing development in 'Future Urban Development' in areas before any infrastructure planning or timing is completed or planned for.

The Kumeu/Huapai area has significant areas identified for 'Future Urban Growth' – these are:-

1. Area south west of Kumeu up to Tawa & Puke Roads inclusive of the Huapai triangle SHA.
2. The area of Koraha & Oraha Roads inclusive of the unnotified SHA at 105 Oraha Road.
3. There is a third area most of the Coatesville/Riverhead Highway has been identified for growth.

The area of the south of Kumeu is large holdings generally having been orchard or farmlands in the past. The areas are now lifestyle blocks or land being held for 'Future Development'.

The area east of Station Road and North of Access Road has sewer and water reticulation provided. West of Station Road, there are no urban services or infrastructure for urbanisation.

2.

In the Orahā/Korahā Roads the previous legacy plans show small blocks of 1 hectare under the 'Countryside Living Zoning'. That is proposed now as 'Future Urban'. There is little road upgrading and no sewer and a partial water supply.

The third area is adjacent to the Riverhead Urban Zone but on prime horticultural soils.

The Unitary Plan Commissioners have released in their 23rd February 2015 'interim guidance' to submitters – the following:-

'The purpose of a RUB is to set a threshold for change (probably a minimum of seven years of developable capacity) and to provide a high level spatial planning tool for structure planning, including planning for infrastructure, to respond to urban growth. The principal feature of a RUB is that urbanisation outside it is to be avoided'.

The proposed 'Future Urban Land Supply Strategy' (FULSS) Proposed a 5 – 10 unconstrained growth, but limits these to areas, where no overall structure planning has been completed or services are available.

In Map 2 of the regional sequencing, it shows the triangle area in Huapai and the Orahā Road SHA area as in first half of Decade One.

The triangle area has a structure plan which shows development of that land but not transport links from the land to the west or south. Thus the structure plan has limited relevance to adjacent land.

In the Korahā/Orahā Roads SHA area and surrounding areas, there is no infrastructure or adequate services for that area or adjacent land.

Given the inadequate consultation with the community over the approval by the Housing Authority, it is inappropriate that the SHA should proceed without the correct and comprehensive structure planning.

The area at Riverhead for 'Future Urban' west of the Riverhead/Coatesville Highway on prime agricultural soils will be contrary to the Proposed Unitary Plan policies or retention of elite soils.

3.

Of concern is the lack of progress NZTA and Auckland Transport have made to solve the crisis that now exists in providing access to the commercial area and having an alternative access south of the existing highway to access the new housing areas and to relieve the traffic congestion on SH16 and Kumeu-Huapai Township.

The development currently underway at Huapai North, together with the triangle housing at Station Road, will necessitate alternative access roading being provided. That access should be identified in Decade One and designated so that there is certainty in the transport corridors for Urban Growth.

The SH16 is proposed to be upgraded in Decade Two, though to the east of Kumeu. We understand that is to be 4 lanes but there is no solution provided for the Kumeu-Huapai Township congestion.

We agree that:-

1. The 'Special Housing Area' in Huapai triangle should be part of Decade One.
2. That the area bounded by Nobilo, Station & Access Roads be included in Decade One for single house zoning as services are already available.
3. We agree an alternative access road south of Kumeu-Huapai Township be provided and designated as part of Decade One to place certainty of access to the live and future zoning south of Kumeu, not Decade three.
4. We agree that the SH16 needs to be upgraded to Kumeu but through traffic non essential to Kumeu-Huapai should be discouraged from using this access. We agree that improving infrastructure should not be at the detriment of the commercial land owners in Kumeu/Huapai.
5. We agree with the Commission that Structure Plans should be completed first before 'live' zoning is approved. That includes the planning, funding of infrastructure, services and acceptable community consultation. There must be a debate over densities of development and timing. We believe that, the area west of Station Road should be in Decade Two.

4.

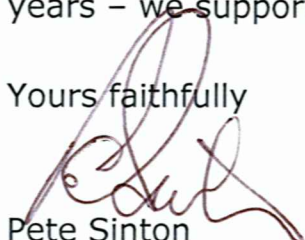
Areas where the Association disagrees are:-

1. The suggestion that the SHA in Orahua Road should proceed before a Structure Plan process is undertaken and approved. That SHA has no services or infrastructure available.
2. The Council should not release land for urbanisation where SHAs or other developments have a higher density from existing development patterns with little or no infrastructure in place.
3. Fast tracking intensive development housing projects with higher density without community input and structure planning being considered and undertaken is not acceptable to the Association.
4. Special Housing areas at 105 Orahua Road has not had community or adjacent land owners input so draft proposals seen at a higher density than proposed under the Unitary Plan 600m² is not acceptable. Plans show 200m² – 400m² site sizes in a 1 hectare single dwelling existing zone.
5. There is no justification for approvals to be granted in Orahua Road until a Structure Plan for the area is designed and released for community input.
6. The land release strategy under Decade One 2012-2016 is not accepted for the Orahua Road development.
7. Large Lots 4000m² should not be included in the 'Future Urban Area', as they do not involve major infrastructure costs.

The Association is aware of 14 areas of SHAs being applied for to Council, none of which are approved. We support Council in that decision.

The areas of the triangle area in Huapai SHA and additional land between Station, Nobilo & Access Roads should be sufficient capacity for the next 7 years – we support Council in that.

Yours faithfully



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Chairman

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