

Kāinga Ora – Homes and Community

Review of Avondale Town Centre redevelopment opportunities against the proposed Urban Development Bill.

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Table of Contents

1.0	Executive Summary	2
2.0	Introduction.....	5
3.0	Summary of the Urban Development Bill	7
3.1	Introduction.....	7
3.2	Specified Development Projects: Large scale and complex projects	7
4.0	Background to the existing Avondale Town Centre	12
4.1	Unlock Avondale Plan – July 2019	12
4.2	Summary of the current Unitary Plan planning framework for Avondale	15
5.0	Consideration of the UDB and the Avondale Town Centre.....	17
5.1	Purpose of the UDB	17
5.2	Consultation obligations of the UDB	17
5.3	Part 3 - Subpart 2 — Resource consent process in respect of a SDP	22
5.4	Part 3 - Subpart 2—Designations	27
5.5	Part 5 - Part 3 - Subpart 2 - Reserves.....	28
5.6	Part 3 – Subpart 4 - Infrastructure	28
5.7	Part 4 - Funding of specified development projects	29
5.8	Part 5 - General Land acquisition	29
5.9	Response to Key Questions	31
6.0	Conclusion	35

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The SDP includes a much wider range of tools beyond a traditional Plan Change regulatory scope. This could include an implementation and/or funding and infrastructure strategy which describes the mechanisms that complement the Land Use plan. This can also include the Land Use plan criteria - Urban design and sustainability outcomes, Centres design and function, street and movement network, environment and Open Space and could introduce Precinct provisions and Assessment criteria for each. In our view, the significant advantage of the SDP process is the power to align all relevant urban redevelopment tools under the one authority in an integrated manner.

The SDP will require governance arrangements and the project objectives will guide any future amendments to the SDP. We note that the SDP will provide a longer term vision for the development of an area which has the advantage of less political influence, and a longer strategic timeframe than a traditional regulatory plan process of 10 years. At the same time, the SDP process provides for the ability to modify the Plan to meet evolving economic, market and environmental considerations.

Kāinga Ora would become the main consent authority under the Resource Management Act 1991 for all resource consent applications in the SDP area. The establishment of a new 'regulatory body' would be a significant undertaking for Kāinga Ora. In addition to resources, there would be the need for the establishment of a significant number of systems and processes to undertake such a regulatory function. Kāinga Ora must also perform the functions of monitoring, enforcing, and promoting compliance in a SDP area.

We support Kāinga Ora being the lead regulatory authority within an SDP, noting that it will likely need to delegate many of the regulatory functions, but there would be advantages to Kāinga Ora in having overall ownership of the regulatory processes, to control desired quality and efficiency outcomes.

In our opinion, it is unlikely that the UDB would be required to increase the development potential for the existing Avondale Town Centre and its immediate surrounds. RMA consenting processes would remain similar to a SDP, and an SDP would not in our opinion provide a significant advantage over the current planning framework.

In our view, there would be an advantage in utilizing the UDP if it was proposed to comprehensively redevelop the Avondale Racecourse land (as part of wider integrated Avondale Town Centre) because the current zoning framework (Major Recreation Zone) does not provide for the intensification of that site. The size and scale of the Avondale Racing site, with the existing Town Centre would be well suited to a SDP, if that was desired.

The differences between the resource consenting under the RMA and SDP are similar, although there is the potential for Kāinga Ora, in formulating the SDP, to specify more explicitly those applications or activities that do not need to be publicly or limited notified. This would greatly

assist with providing certainty to both Kāinga Ora, landowners and development partners. There are also requirements for faster processing of controlled and restricted discretionary activities, which should enable a slightly faster turnaround of consenting.

Kāinga Ora will have extensive powers to compulsorily acquire land, but these powers will be available regardless of the ability to provide a SDP.

In our view, the redevelopment of an area of the scale such as the Avondale Racecourse and the Town Centre would also lend itself strongly to the provision of additional funding arrangements. This would be a key element in supporting the outcomes of the SDP and it would form an important aspect of the overall SDP toolkit for implementation.

The UDB powers will assist Kāinga Ora to advance large major projects more rapidly as it will help coordinate the different aspects of urban development, particularly for 'brownfields' development where more complex issues commonly arise.

The powers that Kāinga Ora have in relation to any UDP, and especially in relation to SDPs, will make it more powerful than any agency that has preceded it. The powers that Kāinga Ora will acquire are currently held separately by a range of agencies and the UDB and SDP process merely enables those powers to be accessed through a single, more streamlined process. The strength of the UDP is the sum of all its parts, and it will be important to ensure that all these tools are carried through to the eventual Act and are not watered down.

In our view, if Kāinga Ora acquired the Avondale Race Course land (or partnered with the land owner) it will be in an advantageous position to control the value uplift of the land through up zoning which could then be captured by way of the sale of super lots.

Once an SDP has been adopted, Kāinga Ora and its partners will have access to a tool-kit of powers. The SDP process will ensure these powers are used for a project in a co-ordinated way, in line with the project objectives, so that redevelopment can occur.

In our view, the combined Avondale Racecourse and Town Centre land site represents an ideal redevelopment area that would be suitable for an SDP process. We consider that there would be a number of potentially significant benefits in adopting the SDP process if the development of the Avondale Racecourse were contemplated, including the significant supply of high quality urban land in a high accessible location, with the ability to plan and fund infrastructure to a standard that has the potential to deliver an exemplar urban environment.

The SDP process will enable Kāinga Ora to move land quickly to market and achieve housing affordability and urban development outcomes. This will enable Kāinga Ora to be more effective and proactive in providing land for urban development.

2.0 Introduction

Kāinga Ora – Homes and Communities (Kāinga Ora) was established through the Kāinga Ora - Homes and Communities Act 2019 on 1 October 2019. Kāinga Ora consolidates and expands the roles of three existing Crown entities: Housing New Zealand Corporation, HLC (2017) Limited (HLC) and the KiwiBuild Unit which was formerly within the Ministry for Housing and Urban Development.

The objective of Kāinga Ora–Homes and Communities is to contribute to sustainable, inclusive, and thriving communities that:

- (a) provide people with good quality, affordable housing choices that meet diverse needs; and,
- (b) support good access to jobs, amenities, and services; and,
- (c) otherwise sustain or enhance the overall economic, social, environmental, and cultural well-being of current and future generations.

Kāinga Ora has two key roles, as both a developer and a public housing landlord. It will be required to perform both roles, and maximise the synergies between them, to achieve its overall objectives. Kāinga Ora will require appropriate financial provisions to be able to carry out these roles and effectively balance risk and flexibility with accountability and transparency.

The current Urban Development Bill (UDB) provides a toolkit for urban development projects and more enabling development powers, as well as the more detailed provisions relating to Māori interests.

This proposed legislation will enable the establishment of “specified development projects”, with access to more enabling development powers to streamline and accelerate these large, complex projects. These powers relate to infrastructure, funding, reserves, and resource management planning and consenting, and will be complemented by appropriate safeguards. The legislation will also provide for land assembly powers, which will be available to all projects undertaken by the Authority.

This report has been commissioned by Kāinga Ora – Homes and Communities (“Kāinga ora”) to consider the implications and potential toolkit available with the proposed UDB. The purpose of the review is to test the proposed bill from a practical perspective using a current live development opportunity (Avondale Town Centre) to determine the particular opportunities or constraints in using the draft UDB, and to identify potential areas of enhancement of the Bill.

The report seeks to provide a comparison of the benefits and constraints for Kāinga Ora in undertaking a project redevelopment within the Avondale Centre and associated land:

- a) under the current legislation against;
- b) under the proposed Urban Development Bill.

We have reviewed the “Unlock Avondale” Enhanced Programme Business Case for Avondale to determine the current framework of proposed strategic outcomes for Avondale. Our review considers whether there are further opportunities beyond the current regeneration strategy that could be enabled from the UDB, that were previously discounted due to current legislative constraints.

You have also sought feedback on the following questions on the UDB:

- a) How would the proposed Bill be better or worse (noting where for each area of the Bill, e.g. iwi, consultation, timeframes, planning, land acquisition, infrastructure, funding)?
- b) Identify anything that stands out as an area that could assist Kāinga Ora in this new process, (Iwi Interests, heritage, transport, reserves etc. need to be factored in)
- c) Ensure that Kāinga Ora are commenting on areas of the Bill that assist with operationalising the delivery,
- d) How can Kāinga Ora get certainty over an outcome for a project (when you do not own or do not wish to own all the land)?
- e) How can Kāinga Ora best ensure that all public agencies working on a shared process and shared timing? Covering roads, schools, parks, reserves?
- f) How to get the change/uplift in value captured and shared across appropriate parties? and
- g) Identify aspects of the Bill that could be disaggregated from the standard Specified Development Project process to assist with other smaller development areas. Kāinga Ora will provide comment on the SDP “lite” concept, recently explored, which was not accepted into the draft bill.

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3.0 Summary of the Urban Development Bill

3.1 Introduction

The key objective of the Bill is to better co-ordinate use of land, infrastructure, and public assets to maximise public benefit from complex urban development projects. The UDB will provide Kāinga Ora with significant new powers, which makes Kāinga Ora responsible for building homes. The UDB seeks to enable a more favourable consenting, infrastructure, land acquisition and funding regime to enable this to occur.

Under the proposed UDB, Kāinga Ora will be able to undertake any urban development project (“UDP”). UDP’s are defined as:

- the development of housing;
- the development and renewal of urban environments, whether or not this includes housing development;
- the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services, or works; but not
- a project that is only to develop or redevelop public housing on land owned by Kāinga Ora.

Some of Kāinga Ora’s powers, for example the ability to compulsorily acquire land, apply in relation to any UDP.

However, in relation to large-scale and complex projects, called “Specified Development Projects” (“SDPs”), the UDB will provide Kāinga Ora with a range of additional significant statutory powers.

3.2 Specified Development Projects: Large scale and complex projects

Part 1 of the UDB requires Kāinga Ora to have particular regard to providing or enabling:

- *integrated and effective use of land and buildings; and*
- *quality infrastructure and amenities that support community needs; and*
- *efficient, effective, and safe transport systems; and*
- *access to open space for public use and enjoyment; and*

- *low-emission urban environments.*

Like the Resource Management Act 1991 (RMA), Kāinga Ora must promote the sustainable management of natural and physical resources by recognising and providing for the matters in section 6 of the RMA, and having regard to the matters in section 7.

However, one of the key aspects of the UDB is the recognition that amenity values might change. This is an important acknowledgement that seeks to clearly state that in delivering a higher density urban environment the amenity values of such development areas are likely to change in line with the planned outcomes sought for a particular area.

While section 8 of the RMA is not referred to in this principles section, the UDB has its own provisions about Maori interests with its particular obligations for Kāinga Ora.

The process for establishing an SDP is detailed. For each proposed SDP Kāinga Ora is required to carry out an initial assessment to evaluate feasibility in which it identifies project objectives, a project area and a project governance body.

The UDB does not specify a minimum size for SDPs. If Kāinga Ora recommends that the project be established as an SDP, it must seek endorsement of that assessment from the responsible Ministers, who must then consider a range of factors, including:

- Whether the project objectives are consistent with the purpose of the UDB, the principles that relate to SDPs, and any existing national directions under the RMA;
- Whether the project area, project governance body and consultation undertaken are appropriate; and
- Whether the SDP is supported by the relevant territorial authorities, or is in the national interest.

If the joint Ministers agree with the request, an Order in Council will establish the SDP and Kāinga Ora will then prepare a draft development plan.

The UDB to outlines the powers Kāinga Ora will have in relation to SDPs, including the ability to:

- override, add to, or suspend provisions in RMA plans or policy statements within the project area. Although importantly, a development plan cannot go beyond the scope of any provisions in a regional policy statement or plan;
- act as a consent authority (for consents under district plans) and requiring authority under the RMA. Kāinga Ora does not however take over the role of a regional council, the Minister

for the Environment, or the Environmental Protection Authority, if a resource consent application relates to matters within their jurisdiction;

- acquire land and reconfigure reserves.
- use funding tools for infrastructure and development activities;
- levy targeted rates and development contributions; and
- build and change infrastructure, including the establishment of its own standards.

As soon as an Order in Council which establishes the SDP has been made, Kāinga Ora will be able to veto or amend resource consent applications and exclude plan changes from applying in a project area before the development plan is operative.

The draft development plan that Kāinga Ora prepares will have to include:

- details of the development's design, including a structure plan;
- any necessary changes to normal RMA planning instruments or processes;
- identification of any areas to be protected or excluded from development;
- high-level information on what development powers Kāinga Ora will have access to and how they will be exercised;
- high-level information and certain details on funding sources; and
- the timing of development.

The draft development plan will be notified for consultation, with submissions being heard and considered by an independent hearing panel (IHP). The IHP will then provide the responsible Minister with a report on the draft development plan, and any changes that it recommends.

We note that appeals against the decision of the IHP are limited to points of law in the High Court only. There is a right to appeal the High Court's decision in the Court of Appeal, but that appeal is the final appeal. The Minister will then either decline or approve the development plan.

We note that there are some limits on Kāinga Ora's powers. The UDP places obligations on Kāinga Ora in relation to Māori interests that extend beyond the framework set out in the Kāinga Ora–Homes and Communities Act 2019.

Kāinga Ora must engage with Māori entities as a part of the SDP process and the powers of the Bill cannot be used in respect of Māori customary land, Māori reserves and reservations, or any parts of the common marine and coastal area in which customary marine title or protected customary rights have been recognised.

The UDB also provides safeguards for the protection of historic heritage values. Kāinga Ora is required to seek recommendations from Heritage New Zealand Pouhere Taonga on the protection of heritage values for a proposed project area, and the development plan cannot override planning rules and other provisions protecting historic heritage in a way that would make them more permissive to development.

The SDP process also has mechanisms that seek to protect environmental bottom lines. For example:

- important environmental features can be excluded from the project area;
- project objectives are required to be consistent with the national policy statements, national environmental standards, and other national directions under the RMA;
- the development plan can apply any existing RMA protections or include new provisions to protect specific areas or features; and
- approval from the Minister of Conservation is required if the project area includes or is adjacent to reserve land, land subject to a conservation interest, or any part of the coastal marine area.

Notwithstanding the above, the SDP process does envisage some loosening of environmental protections compared to those currently in district plans to accelerate development. Although arguably, the most onerous environmental protections exist in environmental bottom lines created under section 6 of the RMA, (matters of national importance such as the coastal environment, outstanding natural features and landscapes, indigenous vegetation and significant habitats of indigenous fauna historic heritage, significant risks from natural hazards) and in regional plans and policy statements, which Kāinga Ora is unable to override.

Kāinga Ora's inability to override heritage matters, or regional plans could prove to be a significant roadblock to some developments, particularly for 'greenfields' developments where regional level consents are often crucial.

We also note that the UDB recognises the aspirations that Māori have in housing and urban development, as potential development partners, as people significantly impacted by historic matters and current pressures in housing, and through their connections with the land and other natural resources. This UDB establishes protections for land in which Māori have interests and an expectation that Kāinga Ora will identify and support Māori aspirations for urban

development in specified development project areas. The includes the opportunity to participate in urban development. We see this aspect as an exciting aspiration and given Kāinga Ora’s knowledge and experience with development areas like Hobsonville Point.

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4.0 Background to the existing Avondale Town Centre

4.1 Unlock Avondale Plan – July 2019

The Auckland Council (Panuku) and the Crown have been working on the Avondale Town Centre for the past decade. The current strategic planning for the Avondale Town Centre is encapsulated in the “Unlock Avondale - Enhanced Programme Business Case for Avondale” (July 2019) to determine the current desired strategic outcomes for the centre.

By way of a summary, the following is noted with regard to the existing Avondale Town Centre¹.

Problem Definition

- *Under development of a number of key sites*
- *Poorly functioning retail and main street*
- *Urban form of the main street has a significant break in the middle*
- *Town centre lacks a defined community ‘heart’*
- *Town square is too small, poorly defined, and not well used*
- *Community facilities are isolated and have significant issues*
- *Public open space is not well connected to the town centre*
- *The racecourse impacts connectivity and takes up a considerable amount of the catchment of the town centre and adds very limited economic activity*
- *Poor housing stock dominated by ageing social housing*
- *Poor connection to the Whau River*
- *Community desire for change*

Key Principles

- *Lead with public realm and community investment and create high quality well activated public space*
- *Work together with stakeholders to deliver quality regeneration and bring more residents into the centre*
- *Be aspirational for the place, the people and Tāmaki Makaurau*
- *Strengthen the viability of the centre*

Strategic Outcomes

- *Work strategically with the Crown and other agencies to address Auckland’s long-term housing need.*

¹ Refer Unlock Avondale report – July 2019

- *Enabling our partner agencies to achieve the optimal urban regeneration outcomes Panuku seeks for Avondale.*
- *Enable high quality developments, leading to increased density and a mix of typologies*
- *Lead strong urban design and urban regeneration outcomes.*
- *Optimise the value and land uses of current underutilised holdings and other identified critically strategic sites.*

Four Key Moves

Key move one: *Enliven the heart of Avondale town centre*

Key move two: *Create high-quality residential neighbourhoods*

Key move three: *Strengthen connections with the town centre*

Key move four: *Foster the growth of local businesses*

Avondale is located close to the City Centre and it has excellent public transport links. The location and connectivity of Avondale along with its average house price, strongly supports its market attractiveness for a variety of housing typologies, including affordable housing and build to rent options. The completion of the City Rail Link will also increase the popularity and accessibility of the Avondale Town Centre.

Kāinga Ora presently owns two large development-ready sites in the town centre at 

s 9(2)(a)

Panuku presently owns three large development sites: 1817 Great North Road (2,912m²); 18 Elm Street (9,647m²) and; Avondale Central (7,447m²). Panuku are also seeking to enable development on the existing library and community centre site at 93 and 99 Rosebank Road once it is no longer required for that purpose (7,573m²). Panuku is aiming to develop these and it has an enhanced programme business case approved by their Board.

The current key land ownership map is set out below:



Figure 1: Key landholdings in Avondale Town Centre

Panuku have developed a high level spatial plan for the Town Centre, as set out in Figure 2 below:



Figure 2: Avondale Spatial Plan

The spatial plan seeks to coordinate public land holdings to increase the residential housing supply, relocate the community facility and enhance connectivity. Significant investment is underway within the public realm to provide a catalyst for private investment into Avondale.

The majority of the remaining land in the Town Centre is held in private ownership and is somewhat fragmented. We note that Avondale Primary School is located at 1910-1940 Great North Road, which comprises a large 1.5833-hectare site that is zoned as Town Centre.

In addition, the Avondale Racecourse is located adjacent to the Avondale Town Centre. While the current strategic planning for Avondale maintains the site in accordance with the current status quo (open space), this site is a significant urban landholding comprising approximately 35 hectares of land. This land features the racecourse, together with a number of stadium and horse racing buildings and playing fields that we understand are leased by the Auckland Council.

4.2 Summary of the current Unitary Plan planning framework for Avondale

The current Unlock Avondale plans do not seek to intensify Avondale to a greater extent than what is currently envisaged through the provisions for the existing Auckland Unitary Plan.

The Avondale Centre is generally zoned Town Centre Zone, with Mixed Use zone and Terraced Housing and Apartment Building (THAB) zone also surrounding the Town Centre. Avondale also features an additional height overlay of 32.5 metres in the Town Centre zone and 21 metres and 22.5 metres high in the respective Mixed Use and THAB zones.

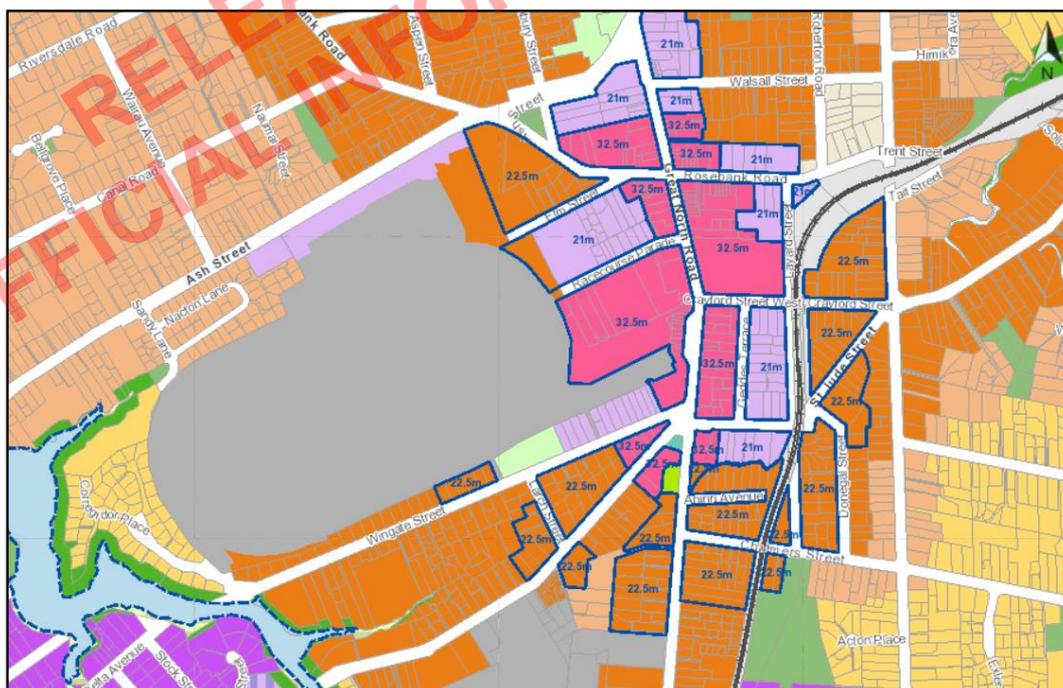


Figure 3: Auckland Unitary Plan Zoning and Height overlay map

Overall, the current Unitary Plan already provides for a high degree of intensification within the Avondale Town Centre. The only exception is the Avondale racecourse and this is discussed further below.

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5.0 Consideration of the UDB and the Avondale Town Centre

The following section of this report discusses key parts of the UDB and its relevance to Avondale.

5.1 Purpose of the UDB

The proposed UDB features a wider purpose, beyond the current purpose of the RMA and other key legislation. Of particular note in the UDB is the acknowledgment that “amenity values may change”. This is an important aspect of the Bill in seeking changes to a particular existing urban area, and the Bill acknowledges that intensification will bring with it changes to expectations around amenity as urban areas transition to higher density.

In order to give effect to the purpose and principles the SDP, there are a significant number of steps and consultation obligations that are required to be undertaken in order to give effect to the UDB. Given the comprehensive nature of the process that needs to be undertaken to create an SDP, it is our view that the process will only be attractive for large and complex redevelopment sites that are either under zoned (or miss-zoned), and/or have infrastructure constraints.

We note that the government is also currently reviewing its National Policy Statement: Urban Development (“NPS: UD”). The NPS: UD will be available in late 2022, therefore the UDB will need to suffice till then. This NPS will impose new responsibilities on Local and Regional Authorities to ensure that there is sufficient capacity for housing and business land in urban areas, to meet the needs of the community and to manage housing affordability.

In many instances, we would expect that many of the current district planning frameworks throughout New Zealand will need to be updated to meet the directives of the NPS: UD. This may obviate the need for SDP’s in some cases.

We also note that the RMA reform review that is currently underway could also result in changes to the existing resource consenting process, particularly around notification and consent timeframes.

5.2 Consultation obligations of the UDB

The establishment of the SDP would require considerable consultation in the formulation of any new development plan for the Avondale area.

Significant consultation and community engagement has already occurred within Avondale. There is a risk of alienating the Avondale community with a new consultation process based on the UDB.

In our view, the real benefit would likely only come from the incorporation of the Avondale Racecourse as a development area. Any significant change on the land use planning for this site would be able to use the SDP provisions and the associated consultation required would be suitable for such a development. Typical consultation for both a Plan Change (RMA) or the SDP (UDB) process would in our view involve similar stakeholders. The likely list of typical stakeholders would include:

- Land owners within the area
- Local Board
- Mana Whenua
- Council and CCO's
- Government entities i.e. Ministry of Education

In many respects, these requirements cover existing obligations similar to that for a Private Plan Change including undertaking a cost benefit analysis of the proposed change. The requirement for an evaluation report under section 32 of the RMA must examine whether the objectives of the proposed change to the Plan are the most appropriate way to achieve the purpose of the Act, and whether the provisions (that is the policies, rules and other methods) are the most appropriate way of achieving the objectives. When a proposal is notified, an evaluation report must be made available at the same time, and decision-makers must have particular regard to it before notifying. If changes are made to the proposal following notification, a further evaluation must then be made available at the time of the decision and decision-makers must have particular regard to that further evaluation. This is essentially the same process for an SDP.

Under the Resource Management Act, there are four processes for developing regional policy statements, regional plans and district plans:

- The standard "Schedule 1" process;
- The limited notification process, which is a variation of the standard Schedule 1 process;
- The streamlined process; and
- The collaborative process.

The standard RMA Plan Change process is set out below:

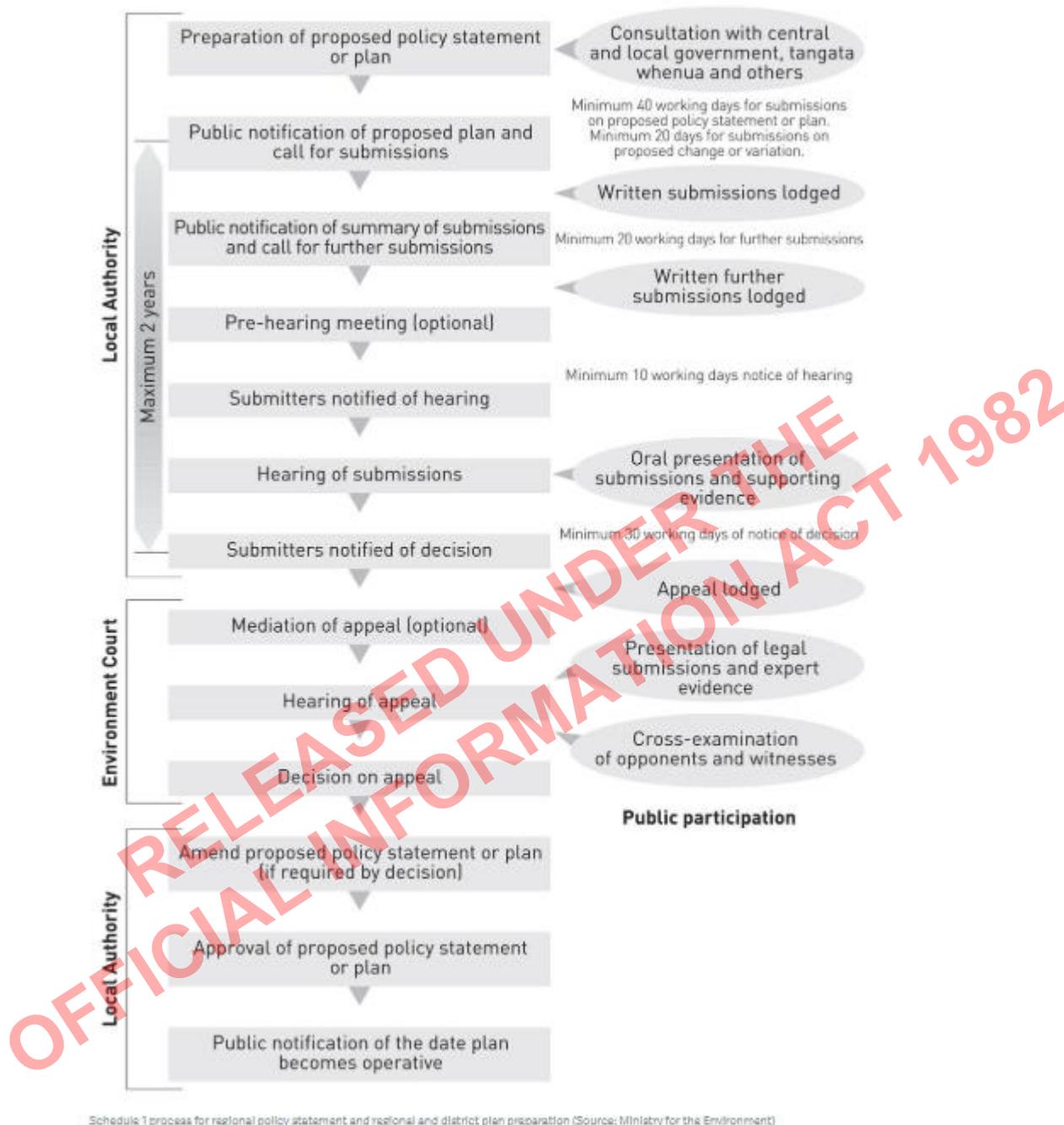


Figure 4: Standard Plan Change Process

The streamlined Plan Change process

Councils may make a request to the Minister to use a streamlined planning process for a proposed policy statement, plan, plan change or variation. The process must be "proportional to the issues being addressed" and is intended to provide greater flexibility in planning processes

and timeframes and allow these to be tailored to specific issues and circumstances. The following diagram summarises the streamlined process.

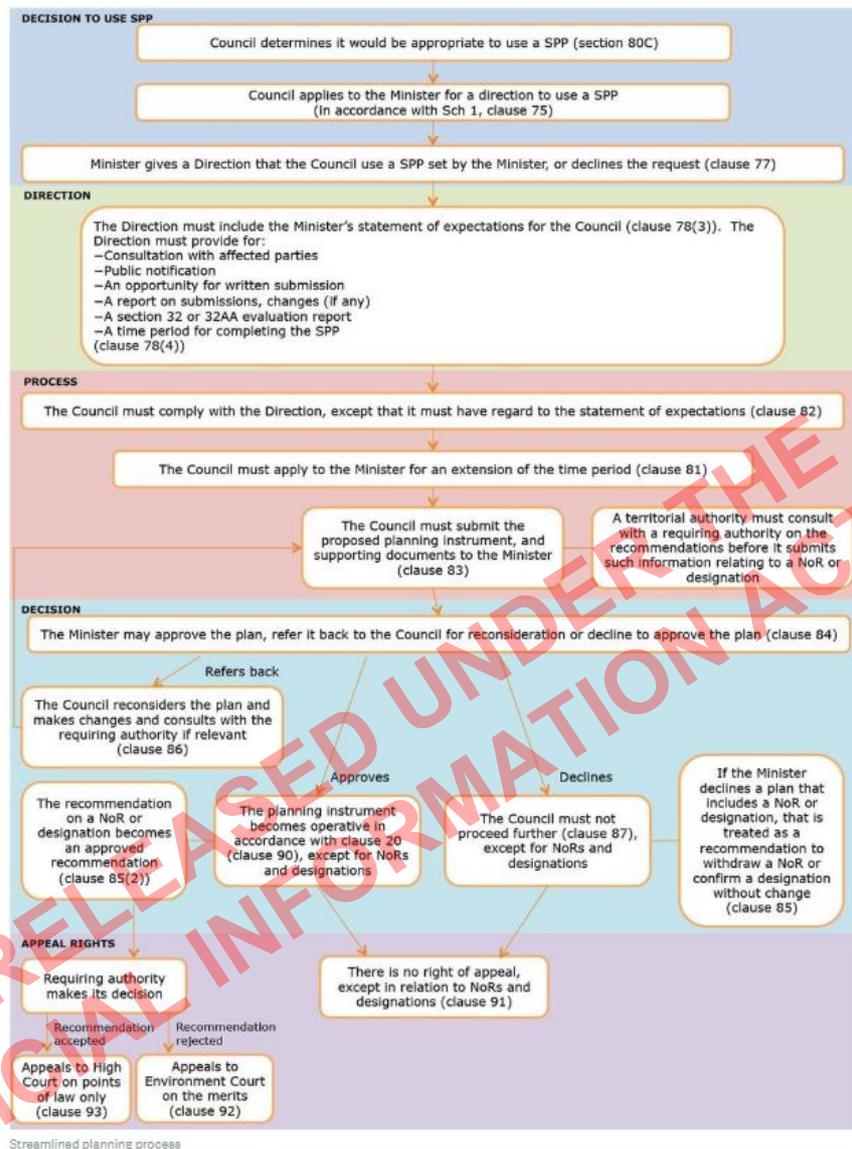


Figure 5: Streamline Plan Change Process

The streamline process does require the Council to progress and promote, which clearly removes key control from Kāinga Ora.

Kensington Swan have undertaken a comparison of Plan Change options for the Eastern Porirua Regeneration Project. This general review remains relevant and this is set out below:

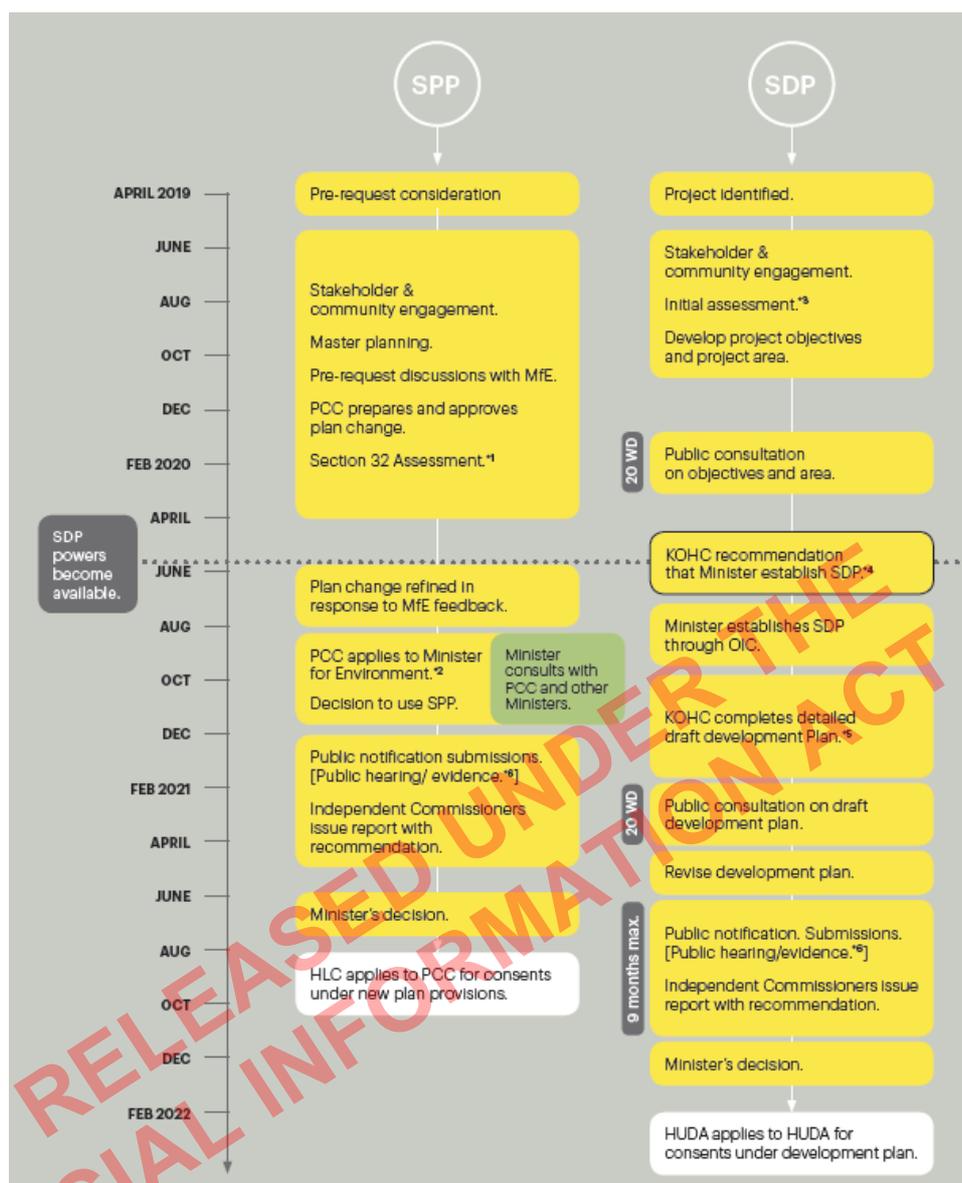


Figure 6: Comparison of SPP and SDP Process (Source Kensington Swan)

Comparison of consultation	
<p>SPP initial consultation:</p> <ul style="list-style-type: none"> - Requires consultation with a set list of stakeholders.⁴ This will allow an early understanding of the issues the community may raise in submissions; - Public consultation is not mandatory but does provide time and process advantages if conducted prior to the application to the Minister. 	<p>SDP initial consultation:</p> <ul style="list-style-type: none"> -To inform the initial assessment of the SDP a set list of stakeholders needs to be consulted. The list is broader than is required for SPP. -Following initial assessment, public consultation (open for 20-30 working days) is required on: <ul style="list-style-type: none"> i The strategic objectives; ii The proposed project and project area; and iii Nominated project lead;

This public consultation must be supported by the assessment of the proposed development project, including the concept plan.

We note that the proposed SDP is not just a two dimensional ‘land use’ plan which will regulate development of land within the SDP.

The SDP includes a much wider range of tools beyond a traditional Plan Change scope. This could include an implementation and or funding and infrastructure strategy which describes the mechanisms that complement the Land Use plan. This can also include the Land Use plan criteria - Urban design and sustainability outcomes, Centres design and function, street and movement network, environment and open Space and could introduce Precinct provisions and Assessment criteria for each.

5.3 Part 3 - Subpart 2 — Resource consent process in respect of a SDP

Resource Consenting Process

Kāinga Ora would become the consent authority under the Resource Management Act 1991 for all resource consent applications in the SDP area. We note that Kāinga Ora would not be the resource consent authority if a regional council, the Minister for the Environment, or the Environmental Protection Authority would be the consent authority under the RMA.

The establishment of a new regulatory body would be a significant undertaking for Kāinga Ora. In addition to resources, there would be the need for the establishment of a significant number of systems and processes to undertake such a regulatory function. Kāinga Ora must also perform the functions of monitoring, enforcing, and promoting compliance in a SDP area.

We note that Kāinga Ora must delegate its powers and functions to a local authority; or 1 or more hearings commissioners in relation to a resource consent application if it is:

- (a) the sole applicant; or
- (b) an applicant in a partnership; or
- (c) is in a significant contractual relationship with an applicant in a project area.

We note that in the case of Auckland the Council’s “Key Accounts” team could provide an appropriate department to manage such resource consenting requirements on behalf of Kāinga Ora under the SDP.

Consideration could potentially be given to contracting the wider consenting function out to a territorial authority, as they already have the resources, and the planning systems to managing a resource consent process. This includes the ability to lodge and track resource consents on

line, and manage workflow through their existing computerised consent tracking system. The Council has an existing administration and democracy services department that can manage billing (consent cost recovery), and the setting of agendas for notified and limited notified resource consents, and/ or liaison with independent commissioners.

There would be merit in appointing a number of independent commissioners to determine such applications. Given the scale of likely development within an SDP, it would be important to ensure that there is a suitable stable of commissioners to provide for efficient decision making on subsequent resource consent applications.

It is also considered that the current TAG and Urban Design Panels are working well, and these approaches could continue within the SDP process, and incorporated into the Regulatory consenting structure. That would have the potential reduce 're-litigation' of urban design matters.

There is a streamline consenting process proposed by the UDB, but the reality is that meeting resource consent information requirements will always have a significant bearing in terms of the ultimate consenting timeframes.

While there is an opportunity for Kāinga Ora to set up its own department in house and create the right organisation to establish the right 'culture', there will always need to be checks and balances in place and, as with any need for independence in decision making, Kāinga ora can only determine the final outcome to a certain extent, and the requirement for the use of commissioners means that no regulatory process will ever provide 100% certainty about the consenting outcome. That being said, the decision making process does acknowledge and put in place a clear mandate for decision makers to have regard to the "the project objectives" in considering a resource consent for an SDP. In our view, this would provide additional weight to the outcomes sought by the SDP. The SDP will require governance arrangements and the project objectives will guide any future amendments to the Development Plan.

Ideally, the UDB would have an overarching section that imposed an obligation on all regulatory decision makers, regardless of the RMA or SDP process that acknowledges the purpose of the UDB and Kāinga Ora's unique role as a government entity tasked with delivering urban development. That was a similar approach to the Special Housing Area legislation, which sought to elevate the needs for affordable housing as a key priority in decision making.

We also note that the RMA review is currently underway. The scope of the review includes looking at the RMA and how it interfaces with the:

- Local Government Act 2002
- Land Transport Management Act 2003
- Climate Change Response Act, to be amended by the Zero Carbon Amendment Bill.

The scope of the review includes spatial planning. This review is seeking to make better and more strategic decisions about resources and infrastructure over longer timeframes.

The Resource Management Review Panel released has its Issues and options paper: *Transforming the resource management system: Opportunities for Change – November 2019*.

The review specifically notes that urban areas are struggling to keep pace with population growth. *“...the RMA has not achieved good outcomes for our urban areas or built environment. A shortage of housing in New Zealand, and the perception that RMA processes are overly cumbersome and provide insufficient certainty for major infrastructure, has seen a long series of official inquiries that have identified shortcomings in the performance of the RMA.”*

The general timeline for the RMA review is set out below:

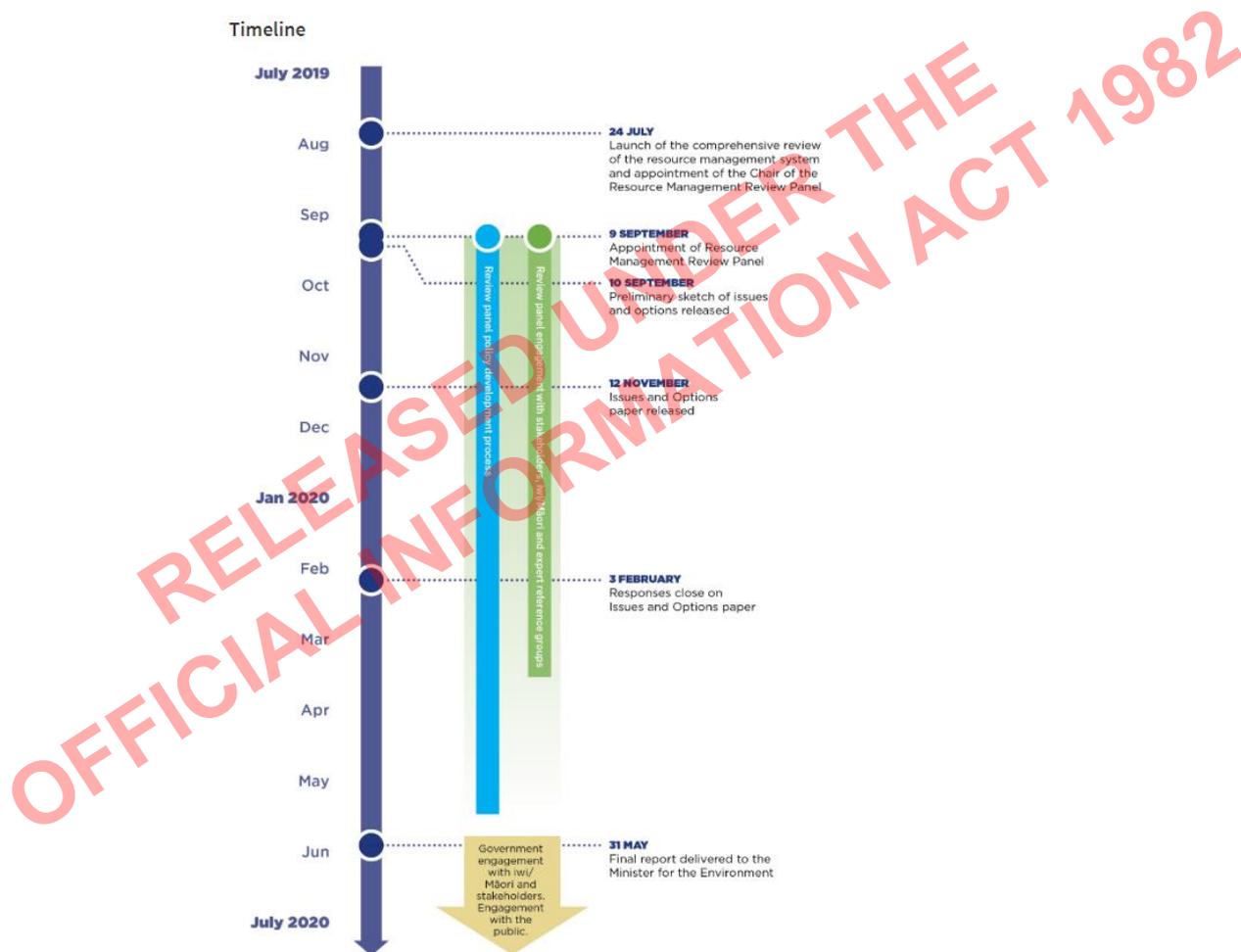


Figure 7: RMA Review Timeline

Consideration of the purpose of the UDB could be a matter specifically provided for under section 104 of the RMA as part of a wider consideration on housing delivery. Like the former Special Housing Area legislation, we consider that the UDB provides for a hierarchy of assessment matters that gives priority to provision of affordable housing as part of the

consideration of any resource consent application within and SDP area. We also see merit in affording limited appeal rights for developments located within a SDP area. This could include restriction to appeal to third parties, for example where a development complies with the building heights as set out in the SDP.

As noted above, the UDB does not override the Regional Policy Statement and Regional Rules. There are a number of regional triggers under the Auckland Unitary Plan, and there is a reasonable prospect that major developments will trigger a requirement for a regional consent under the Unitary Plan.

Consenting outcomes for the Avondale Town Centre

It is unlikely that the UDB would be required to increase the development potential for the existing Avondale Town Centre and its immediate surrounds (excluding the Racecourse land). Current RMA consenting processes would remain similar to a SDP, and an SDP would not in our opinion provide a significant advantage over the current planning framework.

In our view, there would be an advantage in utilizing the UDP if it was proposed to comprehensively redevelop the Avondale Racecourse land because the current zoning framework (Major Recreation Zone) does not provide for the intensification of that site. The size and scale of the Avondale Racing would be well suited to a SDP, if that was desired.

Generally speaking, the current Unitary Plan is an enabling document which puts in place a framework for landowners to develop their land. Public entities like Council or Kāinga Ora can have a role in leading quality outcomes within a development area through the development of their own landholdings, but at the same time private investment in a development area needs to be incentivised to encourage investment from the private sector. Where Kāinga Ora controls the land, they have been able to drive quality outcomes through adherence to their own design quality standards, quite apart from the regulatory framework.

Kāinga Ora has already adopted this approach historically through its developments at Hobsonville Point and its current projects in the Northcote, Mangere and the like. In relation to land owned by Kāinga Ora (or other government entities) the use of development agreements and urban design review panels (like the Tag Process) provide a useful mechanism for Kāinga Ora to control the outcomes on its own land, regardless of the regulatory framework.

Overall, it is our opinion that Kāinga Ora should be the consenting authority in those circumstances where it chooses to establish an SDP, but from a logistical and resourcing perspective it may seek to delegation the “administrative” functions to a local authority. It would however enable Kāinga Ora to control the process and set KPI’s for the achievement of quality and efficiency objectives of importance to Kāinga Ora.

We do note that for land within SDP area, Kāinga Ora will be able to veto or amend resource consent applications and exclude plan changes from applying in a project area before the development plan is operative. Once the development plan is operative, Kāinga Ora as the consenting authority would have the same role as a territorial authority to determine the compliance with the consents of private development within a development area.

A change in the planning framework has the potential to deliver a significant value uplift and rules can also be adopted to ensure that a quality outcome is achieved. Whether the role of a regulator is best achieved by the Council, or by Kāinga Ora would be influenced by a number of factors. There is always a subjective element to urban design, and, regardless of the regulatory entity, the key to achieving quality outcomes is the use of urban design reviews of development scenarios.

Any value uplift of land that is derived through up zoning can also be coordinated with funding through rating and development contributions to assist with the funding of key infrastructure. This would appear to have most relevance in an area such as the Avondale racecourse land, rather than the existing town centre.

One potential change could be to provide a mechanism in the UDB is where an independent Urban Design Panel has signed off on the design of a particular Kāinga Ora development project, the Council cannot relitigate that issue and must adopt that advice as its own.

Notification

It is our understanding that there are no notable changes to the current notification provisions when using the UDB which largely defers to the RMA. Note that the current RMA and Unitary Plan precludes notification in certain instances. There is however an opportunity for the SDP to further control notification as part of the SDP. Like the current Unitary Plan, this could provide for a specific activity to take place without the need for the written approval of affected persons. As an example, within the Unitary Plan THAB zone, notification is specifically excluded in certain cases:

H6.5. Notification

*(1) Any application for resource consent for the following activities **will be considered without public or limited notification or the need to obtain the written approval from affected parties [our emphasis]** unless the Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991:*

- (a) dwellings that comply with all of the standards listed in Table H6.4.1 Activity table;*
- (b) an integrated residential development that complies with all of the standards listed in Table H6.4.1 Activity table;*
- (c) New buildings and additions to buildings which do not comply with H6.6.6 Height in relation to boundary, but comply with Rule 6.6.7 Alternative height in relation to boundary;*

- (d) development which does not comply with H6.6.16 (1a) Front, side and rear fences and walls; or*
- (e) development which does not comply with H6.6.17 Minimum dwelling size.*

The SDP process should in our view enable such provisions to also be adopted, and perhaps go further to make it clear that technical infringements like earthworks or transport matters do not influence the above presumption.

The ability for the private sector to get certainty about the planning process is an important factor for the private sector investment into SDP areas.

For the most part, the majority of resource consents are processed on a non-notified basis under the current RMA processes. However, any new SDP areas should benefit from the use the UDB provisions to manage the notification process, once an SDP has been approved.

The differences between the resource consenting under the RMA and SDP are similar, although there is the potential for Kāinga Ora, in formulating the SDP, to specify more explicitly those applications or activities that do not need to be publicly or limited notified. This would greatly assist with providing certainty to both Kāinga Ora, landowners and development partners. There are also requirements for faster processing of controlled and restricted discretionary activities, which should enable a slightly faster turnaround of consenting.

5.4 Part 3 - Subpart 2—Designations

Kāinga Ora is to be treated as being approved as a network utility operator and a requiring authority under section 167 of the Resource Management Act 1991.

We understand that the designation process was informally considered for development of areas in Avondale (such as Avondale Racing), however this process would result in an obligation to purchase the subject land.

The use of the designation process for the comprehensive urban development of a subject site is not possible under the UDB as the functions are limited to activities that—

- (i) distribute water for supply, including irrigation; or
- (ii) operate a drainage or sewerage system; or
- (iii) construct or operate a road or a railway line

Overall, it is useful that Kāinga Ora is a network utility operator and a requiring authority, and this should be supported.

5.5 Part 5 - Part 3 - Subpart 2 - Reserves

The current process for dealing with reserves is time consuming and cumbersome. The UDB could also incorporate an 'automatic' zoning change as part of the same process. i.e. if acquiring reserve land then the zone alters to the adjacent land zone. This process could be made more efficient outside the SDP process.

5.6 Part 3 – Subpart 4 - Infrastructure

Under the UDB Kāinga Ora will have roading powers in relation to all roads in a project area (other than roads under the control of the New Zealand Transport Agency).

No significant roading or infrastructure is currently proposed for the Avondale Town Centre, which generally seeks to utilize the existing roading network, and enable connections through existing land holdings.

In the context of the existing Avondale Town Centre, there is unlikely to be sufficient advantages to warrant an SDP for this aspect.

However, in our opinion, there could be a significant advantage if Kāinga Ora chose to redevelop a site like the Avondale Racecourse. This would enable Kāinga Ora to operate as its own roading authority. It could define its own preferred roading typologies that are more aligned with urban design outcomes preferred by Kāinga Ora and which are not currently favoured by Auckland Transport.

This could include the introduction of narrower streets or shared roads and enhanced environmental features such as rain gardens and higher quality landscaping. There are potentially likely to be additional costs associated with such infrastructure, however, these costs could be met through targeted rating for the SDP area to recover the costs of delivering a higher quality urban environment.

There would be some benefit to Kāinga Ora if it were able to reduce the current standards required by Auckland Transport but presently Kāinga Ora needs to go through the full SDP process in order to obtain this advantage of this part of the UDB.

Road stopping is an example of a process that could be undertaken without an SDP, with TLA support and in order to achieve a faster process.

5.7 Part 4 - Funding of specified development projects

The UDB provides Kāinga Ora with a range of powers to fund development activities that are carried out to achieve project objectives. This includes the power to—

- set targeted rates;
- require development contributions;
- require betterment payments;
- fix infrastructure and service charges.

The UDB provides Kāinga Ora with the ability to seek additional funding for a project area. For new or upgraded urban areas that provides an opportunity to provide for enhanced infrastructure and amenities and to potentially recover these additional costs through a targeted rate, or contribution.

There are likely to be additional costs associated with enhanced infrastructure, however, these costs could be met through targeted rating or contributions for an area to recover the costs of a delivering a higher quality urban environment. Obviously there would need to be balance in managing longer term affordability and cost issues, but we consider this to be a strong aspect of the UDB.

In our view, the redevelopment of an area of the scale such as the Avondale Racecourse would lend itself strongly to the provision of additional funding arrangements. This would be a key element on supporting the outcomes of the SDP and would form an important aspect of the overall toolkit for implementation.

We have assumed that Kāinga Ora would have the ability to seek loans to fund capital investment and there could be benefits in funding larger scale infrastructure projects associated with a SDP with longer term funding or bonds that are recovered over a longer timeframe from the future home owners.

5.8 Part 5 - General Land acquisition

Kāinga Ora will have extensive powers to compulsorily acquire land, but these powers will be available regardless of the ability to provide a SDP.

We understand that Kāinga Ora will have much wider land acquisition powers:

- i. It will be able to apply to the Minister for Land Information to have land or an interest in land (except for sensitive Māori land) taken by compulsory acquisition under Part 2 of the PWA for one or more 'specified works', without demonstrating that the work also meets the definition of 'public work' in the PWA;

- ii. It will be able to do this at any time, whether or not a development project has been established and whether or not the relevant land is within a project area;
- iii. It will be able to do this with the intention of transferring that land or interest in land to another person or entity for a specified work;
- iv. The land will vest in Kāinga Ora instead of the Crown. Kāinga Ora will be able to hold land or interest in land in its own name without having to hold it for a particular public work;

We note that Panuku have already commenced acquisition of land in Avondale through the public works act. This section of the UDB is a key tool to assist in the acquisition of key land holdings and it is noted that Kāinga Ora does not need to prepare a SDP to utilise these powers. Key land holdings in Avondale are already controlled by Kāinga Ora or Panuku. Regardless of any decision to adopt an SDP process, this section of the UDB provides Kāinga Ora with the power to acquire land, if required.

In a wider context there would be significant advantages to Kāinga Ora if it were able to efficiently acquire strategic land holdings that would enable Kāinga Ora to complete development areas, regardless of whether they fall within an SDP area. Historically, we understand that there has been a number of instances where the acquisition of small pockets of private land would greatly assist in providing a more cogent development area, such as suburbs like Glen Innes, where the ability to acquire the “missing teeth” that will unlock the wider development potential of the land could be highly attractive.

This is a key tool for Kāinga Ora in this instance and should be strongly supported as a standalone provision, as currently proposed.

One of the historic challenges for redevelopment has been the access to adjacent private land for right of entry for drainage services. The current provisions under the Local Government Act are slow and cumbersome. It would be highly advantageous to Kāinga Ora if it had power of entry to private land and to connect its infrastructure to existing public services located on adjacent private land. This would be a key tool in unlocking Kāinga Ora land regardless of whether it decide to purchase the adjacent sites.

We note that these acquisition powers can be used for the purpose of acquiring land in future development areas prior to any uplift in land values following an urban development project’s announcement. This would be a significant advantage with a site like the Avondale Racecourse.

5.9 Response to Key Questions

In the table below, we respond to the key questions that were put us in comparing the RMA and SDP processes for Avondale. This comparison assumes we had not already undertaken consultation (which has already occurred).

Questions	Our response (for Avondale Town Centre)		
	Issue/Power	Better Worse Same	Comments
a) How would the proposed Bill be better or worse (noting where for each area of the Bill, e.g. iwi, consultation, timeframes, planning, land acquisition, infrastructure, funding)?	Iwi Consultation	Same	Generally, the process would be the same, noting that consultation has already occurred for the ATC. Additional consultation requirements likely to delay masterplan delivery.
	Consultation	Same	Generally, the process would be the same, noting that consultation has already occurred for the ATC. Additional consultation requirements likely to delay masterplan delivery.
	Timeframes	Same	Generally, the process would be the same, noting that significant strategic planning has already occurred for the ATC. Additional requirements likely to delay masterplan delivery.
	Planning	Same	Unitary Plan already provides for High Intensity development in the ATC
	Land acquisition	Better	Wider powers to acquire land, but not contingent on an SDP process.
	Infrastructure	Better	Ability to manage infrastructure and roading design enhanced, but not an apparent significant issue for ATC
	Funding	Better	Ability to increase funding, but still requires market uptake. Funding has been allocated for the Multi-Purpose Community Facility and land acquisitions. Infrastructure and design constraints should be able to be discovered, proved and allocated.
Questions	Our response (for Racecourse)		
	Issue/Power	Better Worse Same	Comments
a) How would the proposed Bill be better or worse (noting where for each area of the Bill, e.g. iwi, consultation, timeframes, planning, land acquisition, infrastructure, funding)?	Iwi Consultation	Same	Redevelopment of the Avondale Racecourse would trigger consultation but, this would be required regardless if the land were to be developed under the UDP or though the normal RMA consenting regime.
	Consultation	Better	Redevelopment of the Avondale Racecourse would trigger consultation but, this would be required regardless if wither the land were to be developed under the UDP or though the normal RMA consenting regime. There will be an enhanced toolkit in consulting with Iwi, which could provide for more meaningful consultation.

	Timeframes	Better	The timeframes for a UDP would in our view be more efficient than with a typical Plan Change process.
	Planning	Better	The SDP process would provide an opportunity to up zone the Racecourse land. The process is similar to a plan change but the overarching purpose of the SDP would give greater weight to the desired outcomes for the site.
	Land acquisition	Better	Wider powers to acquire land, but not contingent on an SDP process.
b)	Infrastructure	Better	Ability to manage infrastructure and roading design enhanced.
c)	Funding	Better	Ability to increase funding particularly associated with planning betterment and new infrastructure
b) Identify anything that stands out as an area that could assist Kāinga Ora in this new process, (Iwi Interests, heritage, transport, reserves etc. need to be factored in)	This will depend on the particular area. There are no strong advantages for the existing town Avondale Town Centre in using the SDP process, but if the Avondale Racecourse were acquired for redevelopment, the planning transport, infrastructure, reserves and funding processes would provide strong collective benefits to the redevelopment of this area.		
c) Ensure that Kāinga Ora are commenting on areas of the Bill that assist with operationalizing the delivery.	Aspects have been discussed throughout this report.		
d) How can Kāinga Ora get certainty over an outcome for a project (when you do not own or do not wish to own all the land)?	The incorporation of land within an SDP may provide Kāinga Ora with greater certainty, although the effectiveness of the any outcome will be informed by the quality of the planning provisions that are adopted for an SDP. It will however provide Kāinga Ora with a greater role to determine these outcomes, both as a land owner, and a regulatory body.		
e) How can Kāinga Ora best ensure that all public agencies working on a shared process and shared timing? Covering roads, schools, parks, reserves?	<p>There could be an element of carrot and stick in working with other agencies. The UDB puts Kāinga Ora in the position to potentially ‘override’ the Council’s current processes or policies. That may well provide the ability to better negotiate outcomes outside of the SDP process.</p> <p>It will also provide Kāinga Ora with the ability to provide leadership on urban land redevelopment to provide exemplar developments that are innovative in terms of their delivery. Such an outcome could well lead to pressure for the current territorial authority to fall into line with the approach adopted by Kāinga ora.</p>		
f) How to get the change/uplift in value captured and shared across appropriate parties? and	One of the significant benefits of the UDB is the proposed funding arrangements and these should be strongly supported, and it is critical that such funding is aligned with the planning and infrastructure powers that are enabled by the UDB. These essentially need to work as an integrated package in order to deliver a quality urban environment.		
g) Identify aspects of the Bill that could be disaggregated from the Standard SDP process to assist with other smaller development areas. Kāinga Ora will provide comment on the SDP “lite” concept, recently explored, which was not accepted into the draft bill.	<p>As noted above, the current provisions under the Local Government Act are slow and cumbersome. It would be highly advantageous to Kāinga Ora if it had power of entry to private land and to connect its infrastructure to existing public services located on adjacent private land. This would be a key tool in unlocking Kāinga Ora land regardless of whether it decide to purchase the adjacent sites.</p> <p>The current process for dealing with reserves is time consuming and cumbersome. It is envisaged that this power would be exercised with Council approval. Could also incorporate an ‘automatic’ zoning change as part of the same process. i.e. if acquiring reserve land then the zone alters to the adjacent land zone. This process could be made more efficient outside the SDP process.</p>		

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In our view, the current Avondale Town Centre is unlikely to derive any great benefit from the establishment of an SDP within the existing Centre. The planning framework and development pattern is largely set out and sufficient strategic planning as already underway to deliver the outcomes that are presently being sought by Panuku and the associated crown entities.

We do however consider that there would be a number of potentially significant benefits in adopting the SDP process if the development of the Avondale Racecourse were contemplated. The current zoning and the site and location of the site are such that the substantial effort to develop an SDP would in our view be justified. In that scenario, we would envisage that an SDP would cover both the Racecourse and the Town Centre to facilitate the integrated planning of the centre as a whole.

We could see a scenario whereby if Kāinga Ora were able to acquire the Avondale Racecourse at its present market value, the resulting “up zoning” of the land could release considerable value to this land, which would be used to advance a high quality urban development. The site has the potential to deliver a significant increase on housing within an attractive brownfields location.

Kāinga Ora would have the ability to control the funding arrangements for the land. This could deliver a similar housing model as was developed at Hobsonville Point, with Kāinga Ora adopting the role a lead master planner and land developer.

A summary of key points of difference between the SDP and current powers is set out below:

Power	SDP	Current Situation
Change regulations to enable intensification	Ability provide for more specific/prescriptive urban development outcomes and create a future consenting framework that streamlines resource consenting and provides certainty to the development sector.	Through a Private Plan Change, the normal RMA processes apply.
Streamlining the resource consent process	Ability to streamline some consenting and reduce notification risks (See below)	Normal RMA provisions apply.
Compulsory land acquisition	Once acquired, land can be transferred to a private developer. Removes offer-back obligations (except Māori land), require Crown entities in the project area to contribute surplus land, and assemble and hold land without this being for a particular public work).	Can use the PWA to acquire land for ‘urban renewal’ under LGA 1974 & 2002 but not for commercial projects
Exchanging or revoking suitable types of reserve land	Can make changes to government purpose, scenic, historic, recreation and local purpose reserves.	If it’s a Council recreation reserve can review under Reserves Act but tends to run as a separate process.

Stopping, re-aligning, designating and creating roads and other transport routes.	Kāinga ora will be a road controlling authority and can build, change or remove transport infrastructure, power to commission and construct public transport facilities and ancillary infrastructure). Still need to work with Council's	Local road controlling authority and requiring authority powers.
Designating, altering and constructing infrastructure (and make, suspend or	Kāinga Ora can build, change or remove infrastructure (except nationally significant), require network utility operators to install or alter existing network utility assets).	Requiring authority powers for local government work does not currently apply to Kāinga Ora.
Vesting infrastructure in local councils or other appropriate receiving organisations at the completion of development projects.	Ability for Kāinga Ora to influence engineering design standards.	This occurs at present but must be in line with ATCOP or similar engineering standards of the Council.
Independently funding and incentivising urban development	Kāinga Ora can set development contributions, betterment payments or connection payments to align budget and costing with desired urban outcomes.	Council sets development contributions and through rating frameworks.

In terms of the RMA consenting timeframes, the following table prepared by Kensington Swan is useful:

APPLICATION STAGE	EXISTING FAST TRACK RESOURCE CONSENT PROCESS UNDER THE RMA (FOR CONTROLLED ACTIVITIES (NOT SUBDIVISION))	EXISTING RESOURCE CONSENT PROCESS UNDER THE RMA	SDP FOR CONTROLLED AND RESTRICTED DISCRETIONARY ACTIVITIES (STREAMLINED CONSENTING PROCESS A) ¹⁸	SDP FOR DISCRETIONARY AND NON-COMPLYING ACTIVITIES (STREAMLINED CONSENTING PROCESS B) ²⁰
Decision as to notification	Must be made within 10 working days after lodgement.	Must be made within 20 working days after lodgement.	Must be made within 10 working days of lodgement.	Must be made within 20 working days of lodgement.
<i>Non-Notified Application</i>				
Decision whether to grant consent	Must be made within 10 working days after lodgement.	Decision due 20 working days after lodgement.	Within 10 working days of lodgement for land use or subdivision activities. Within 20 working days of lodgement for all other activities.	Within 20 working days of lodgement.
<i>Notified Application</i>				
Submissions period	N/A	20 working days from date of notification.	20 working days from date of notification.	20 working days from date of notification.
Hearing	N/A	Public Notification: Hearing must be completed within 75	No public hearing is to be held for applications for land use and subdivision activities.	Hearing must be held where one or more submitters have requested to be heard.

¹⁸ Process A applies when a resource consent application is made for a controlled (C) or restricted discretionary (RD) activity under the development plan, the district plan or regional plan.

²⁰ Process B applies when a resource consent application is made for a discretionary (D) or non-complying (NC) activity under the district plan or development plan provisions that override, add to or suspend district plan provisions within the project area.

6.0 Conclusion

The UDB powers will assist Kāinga Ora to advance large major projects more rapidly as it will help coordinate the different aspects of urban development, particularly for large 'brownfields' development where more complex issues commonly arise.

The powers that Kāinga Ora have in relation to any UDP, and especially in relation to SDPs, will make it more powerful than any agency that has preceded it. The powers that Kāinga Ora will acquire are currently held separately by a range of agencies and the UDB and SDP process enables those powers to be accessed through a single, more streamlined process. The strength of the UDP is the sum of all its parts, and it will be important to ensure that all these tools are carried through to the eventual Act and they are not watered down.

In our view, if Kāinga Ora the acquired the Avondale Race Course land (or partnered with the land owner) it will be in an advantageous position to control the value uplift of the land through up zoning which could then be captured by way of the sale of super lots.

Once an SDP has been adopted, Kāinga Ora and its partners will have access to a tool-kit of powers. The SDP process will ensure these powers are used for a project in a co-ordinated way, in line with the project objectives, so that complex development can occur.

Based on our review, the SDP process is unlikely to be warranted for the development of the existing Avondale Town Centre given the advanced planning that is already underway.

In our view, the Avondale Racecourse site (or such similar sites) represents an ideal site that would be suitable for an SDP process, and we consider that there would be a number of potentially significant benefits in adopting the SDP process if the development of the Avondale Racecourse were contemplated, including the significant supply of high quality urban land in a high accessible location, with the ability to plan and fund infrastructure to a standard that has the potential to deliver an exemplar urban environment.

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