

BEFORE THE AUCKLAND UNITARY PLAN
INDEPENDENT HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991 as amended
By the Local Government (Auckland Transitional
Provisions) Amendment Act 2010

AND

IN THE MATTER of submissions lodged on the Proposed Auckland
Unitary Plan

REGARDING Various Topics

MEMORANDUM ON BEHALF OF
LAND SOLUTIONS LTD
AND
AUCKLAND DEVELOPERS GROUP
AND
OTHER PARTIES

DATED 30TH SEPTEMBER 2014

Land Solutions Ltd
Town Planners
Manukau
Auckland

Level 3 AMI Building
15 Osterley Way
Manukau
Auckland 2241

Ref J Maplesden

MAY IT PLEASE THE HEARINGS PANEL

1. This memorandum is lodged on behalf of:

- a) Land Solutions Ltd
- b) Auckland Developers Group
- c) Other associated parties

(Collectively called "the submitters")

With regard to the Notices of Pre Hearing Meeting on Proposed Auckland Unitary Plan notably Topic 005 and 013 Regional Policy Statement (RPS) Growth Provisions.

2. The submitters are all represented by Land Solutions Ltd (LSL) with respect to PAUP matters, and are all primary and/or further submitters on Topics 005 and 013, as well as a variety of other Topics. While there will be differences in cases presented, the submitters share the concerns outlined in the memorandum by Ellis Gould Solicitors (D A Allan acting), to the Unitary Plan Independent Hearings Panel, dated 19th September 2014.
3. The submitters also share the concerns and agree with, the memorandum to the Panel by counsel for Ports of Auckland Limited and Scentre (New Zealand) Limited, Russell McVeagh (D A Nolan acting) dated 12th September 2014.
4. With respect, the point made in paragraph 4(b) is emphasised.

THE REGIONAL POLICY STATEMENT FRAMEWORK

5. As observed in the memorandum by Mr Allan at paragraphs 28-30, it is considered that the RPS section of the Unitary Plan, and an adequate understanding of issues relating to this, is critical to evaluated outcomes.
6. A simple layman's analogy would be the completion of an immense complicated jigsaw. We know that there are thousands and thousands of pieces, but only have a rudimentary idea of the framework. Unless and until that is given adequate consideration, and then arrived at, the infill of the balance of the picture will be necessarily both delayed and possibly flawed. This endorses the position stated in paragraph 33 of the memorandum by Mr Allan.
7. Outcomes that are otherwise likely to result, are not only a poorly constructed Unitary Plan, but also one resulting from a process succinctly described in paragraph 3 in the email dated 15th September 2014, from Mr Allan to administrators Mr Reid and Ms McKee. This is attached as Annexure 2 to the memorandum by Mr Nolan.

8. It is respectfully suggested on behalf of the submitters, that the division of material into Topics and Sub-Topics that has been used, with the subsequent severe curtailment of time for appearance at hearing, can do little for satisfying outcomes.
9. A simple over-arching question may be – “Given the apparent continuing population growth of Auckland, but the on-going changes within this – where are the appropriate links between overlapping Topics and Sub-Topics for the benefits and flexibility of eventual outcomes?”

Paragraph 47 of the submission by the Minister of the Environment, Hon Amy Adams, to the PAUP that – “The RPS Component of the proposed AUP currently provides for up to 40 per cent of new dwellings to be located in greenfield areas (outside the 2010 MUL), but this may need to be increased to 60 or 70 per cent if the development controls and zoning cannot be adjusted to provide the necessary future capacity within the 2010 MUL” – is pertinent to getting the overview RPS as nearly appropriate as possible, and proceeding with some caution.

Dated 30th September 2014



J Maplesden

Planning Consultant for the Submitters