

**BEFORE THE AUCKLAND UNITARY PLAN INDEPENDENT HEARINGS PANEL**

**IN THE MATTER** of the Resource Management Act 1991  
and the Local Government (Auckland  
Transitional Provisions) Act 2010

**AND**

**IN THE MATTER** of Topic 016 RUB North / West and  
Topic 017 RUB South

**AND**

**IN THE MATTER** of the submissions and further  
submissions set out in the Parties and  
Issues Report

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**STATEMENT OF EVIDENCE OF CHLOE ASTRA TRENOUTH  
ON BEHALF OF AUCKLAND COUNCIL**

**(PLANNING – STRATEGIC OVERVIEW)**

**14 OCTOBER 2015**

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## 1. SUMMARY

- 1.1 The purpose of this evidence is to provide a strategic planning overview for Topic 016 RUB North/West and Topic 017 South (**Topic 016/017**). The Rural Urban Boundary (**RUB**) is a key method for the implementation of the Auckland Council's (**Council**) growth management strategy. Therefore as part of this evidence I have set out the strategic framework for the location of the RUB, and provide an overview of the core elements of the growth management strategy.
- 1.2 The core elements of the Council's growth management strategy as discussed in the Council's evidence to Topic 013 RPS Urban Growth (**Topic 013**) are:
- (a) Well located land suitable for urban development is not abundant, therefore land identified for future urban growth must be able to be developed efficiently to achieve a quality compact urban form.
  - (b) The RUB is a key method to achieve the objective of a quality compact urban form and is important for protecting environmentally sensitive areas and rural productive land.
  - (c) The RUB should be a defensible, long term rural-urban interface that is not subject to incremental change to provide long term certainty about the extent of the urban area to enable planning and investment for infrastructure to support new growth areas.
  - (d) The integration of land use and infrastructure is critical to enable growth – bulk infrastructure is expensive and often has a long lead in time therefore aligning infrastructure with growth is essential to provide infrastructure in the right place at the right time.
  - (e) Approximately 11,000ha of land is zoned Future Urban zone (**FUZ**) within the RUB providing sufficient land supply to accommodate projected population growth to 2040.
  - (f) The Future Urban Land Supply Strategy (**FULSS**) will ensure efficient planning for the provision of publicly funded infrastructure to maintain sufficient unconstrained (ready to go) development capacity to accommodate a minimum of 5 years growth at any one time.
  - (g) The Council can change the RUB if necessary in response to monitoring of development and land supply uptake.

- (h) A balanced approach to providing for growth is supported by encouraging greater residential intensification within the 2010 metropolitan area supported by some greenfield expansion contiguous to the urban area and in satellite towns.
- (i) Providing for up to 40% of growth outside the 2010 metropolitan area recognises that achieving the 70% intensification target will require a generational shift that may be difficult and therefore additional growth is provided for within greenfields if this aspiration cannot be met

1.3 Also addressed in this evidence is the Panel's interim guidance on Topic 013, which supports many of the key aspects of the growth management strategy, such as the objective of a quality compact urban form, a RUB as the most appropriate method to achieve this objective, that urbanisation outside the RUB is to be avoided, and the importance of efficient provision of infrastructure. However, a number of other matters that are not specifically supported by the interim guidance are also important to determining the location of the RUB:

- (a) **The RUB as a RPS method that is not subject to incremental changes** - Urban growth is a regional significant issue and, as such, the growth management strategy is established by objectives and policies in the Proposed Auckland Unitary Plan (**PAUP**) Regional Policy Statement (**RPS**). I consider it most appropriate that the method of the RUB be located at the RPS level and not the district plan level where it would be subject to private plan changes. In my opinion, retaining the RUB at the RPS is a more efficient and effective method to achieve the objectives of the RPS because it provides greater certainty to enable managed growth and achieve the broader environmental objectives and policies of the RPS and strategic integration of infrastructure with land use in accordance with regional functions by section 30 of the Resource Management Act 1991 (**RMA**).
- (b) **Integration of land use and infrastructure** - Land use integration with infrastructure is a key consideration when determining the location of the RUB to achieve a quality compact urban form. Bulk infrastructure required to unlock urban development has significant funding implications (and social costs) and needs to be planned well in advance of growth. This is the infrastructure that generally cannot be provided by developers. Alignment of investment infrastructure with growth is a core principle of the Auckland Plan Development Strategy, and a commitment to facilitate growth by providing for

infrastructure in the right place at the right time. I consider it to be prudent planning to ensure that areas identified for growth can be serviced by bulk infrastructure within the 30 year planning horizon identified by the RPS policy framework.

- (c) **Excluding areas not suitable for development from the RUB** - In determining the most appropriate location for the RUB there are a number of considerations and trade-offs to achieve a quality compact urban form and the most efficient use of land. The growth management strategy includes avoiding, remedying and mitigating adverse effects on the environment to achieve the sustainable management purpose of the RMA. I therefore consider it appropriate for the RUB to exclude areas from urban development to protect rural productive values and significant natural environmental values.
- (d) **Including criteria within the RPS to change the RUB** - I propose a new policy to be inserted in the RPS Chapter B2.1 that sets out the criteria to be considered when determining the location of the RUB. This policy has been drafted with consideration of the Panel's best practice approaches for changes to the RUB, in addition to a number of other key factors that are required to achieve the objectives of the RPS:
- Identifying a defensible boundary to provide a hard edge to 2040;
  - Importance of land use and transport integration in defining urban form;
  - Recognising environmental constraints; and
  - Supporting rural productive land values.

- 1.4 Prior to the Panel releasing interim guidance on 31 July 2015 about best practice approaches to changes to the RUB, the Council had developed and applied a set of RUB assessment criteria for considering submissions about the location of the RUB. The set of 11 criteria are based on the RUB principles and criteria used for defining the RUB, as discussed in the evidence of Ian Bayliss. Assessment against the RUB criteria provides a transparent mechanism to test whether land is appropriate for urban development and whether inclusion of the land within the RUB can achieve the objectives and implement the policies of the RPS.

## **2. INTRODUCTION**

- 2.1 My name is Chloe Astra Trenouth. I am a Senior Consultant Planner at Hill Young Cooper Ltd. I previously presented planning evidence on Topic 013 for the Council. I have been asked by the Council to provide strategic planning evidence for Topic 016/17 relating to the mapped location of the RUB in the PAUP.
- 2.2 My relevant experience was previously outlined in my evidence to Topic 013<sup>1</sup> and my experience and qualifications are attached (**Annexure A**).
- 2.3 This evidence does not address the submissions to Topic 016/017 as this will be done by sub-regional and area specific planning evidence.

## **3. CODE OF CONDUCT**

- 3.1 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

## **4. SCOPE**

- 4.1 My evidence addresses the following matters:
- (a) Statutory framework applicable to determining the location of the RUB;
  - (b) Overview of Council's growth management strategy;
  - (c) RUB at the PAUP level;
  - (d) Integration of land use and infrastructure;
  - (e) Excluding areas not suitable for development;
  - (f) RPS criteria to change the RUB; and
  - (g) Methodology for assessing submissions.
- 4.2 I have relied on the overview evidence provided to Topic 016/017 of the following Council witnesses in preparing my evidence:

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<sup>1</sup> Evidence of Chloe Trenouth to Topic 013, 24 November 2014

- (a) Douglas Fairgray - economic
- (b) Ian Bayliss – background to the notified RUB
- (c) Joshua Arbury – strategic transport
- (d) Dawne Mackay - future urban land supply strategy
- (e) Theunis van Schalkwyk, Evan Keating, Alastair Lovell and Scott MacArthur - Auckland Transport
- (f) David Blow, Chris Allen and Andre Stuart – Watercare
- (g) Philip Jaggard - Stormwater

## **5. STATUTORY FRAMEWORK**

- 5.1 In this strategic overview evidence I set out the statutory framework which the Council's area specific planning witnesses will apply in their assessments of whether the proposed location of the RUB meets the statutory tests of the RMA.
- 5.2 In the PAUP as notified, the RUB is an RPS method. As discussed in my evidence for Topic 013, the statutory framework for assessing the merits of the RPS provisions are set out in sections 30, 32, 59, 61 and 62 of the RMA.
- 5.3 By way of summary, the proposed location of the RUB must:
- (a) Accord with and assist the Council in carrying out its functions so as to meet the requirements of Part 2 of the Act;
  - (b) Take account of effects on the environment;
  - (c) Accord with any regulations (including national environmental standards);
  - (d) Give effect to a national policy statement or the New Zealand Coastal Policy Statement;
  - (e) Have regard to management plans and strategies under other Acts, including the Auckland Plan (to the extent that they have a bearing on the resource management issues in the region);
  - (f) Have regard to any relevant entry on the New Zealand Heritage List, and to regulations relating to ensuring sustainability, or the conservation,

management, or sustainability of any fishing resources (to the extent that they have a bearing on the resource management issues in the region);

- (g) Have regard to the extent to which the RPS needs to be consistent with policy statements and plans of adjacent regional councils and with regulations made under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012;
- (h) Take into account any relevant planning document recognised by an iwi authority, and recognise and provide for matters in any relevant planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 (to the extent that their content have a bearing on the resource management issues in the region);<sup>2</sup>
- (i) Must not have regard to trade competition (or the effects of trade competition); and
- (j) Comply with other statutes (which in the Auckland region include the Hauraki Gulf Maritime Park Act 2000 and the Waitakere Ranges Heritage Area Act 2008).

5.4 In terms of the regional council functions under the RMA, I consider section 30(1)(gb) to be particularly relevant to the RUB as a method in the RPS because the RUB is a method that will assist with the strategic integration of infrastructure with land use.

## **Section 32 of the RMA**

5.5 In addition, section 32 of the RMA requires an evaluation of the RUB. The PAUP RPS provisions which include the RUB maps are to be examined as to whether they are the most appropriate way to achieve the objectives of the PAUP RPS.

5.1 The objectives and policies relating to urban form and land supply, and the method of a RUB, were identified as being a significant policy shift, and were analysed in the Auckland Unitary Plan Evaluation Report (the **evaluation report**).<sup>3</sup> Analysis of the RUB location was addressed in detail in Part 2.2 of the evaluation report.

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<sup>2</sup> Sections 61(2A)(a) of the RMA.

<sup>3</sup> Section 32 Report for the Auckland Unitary Plan: 2.1 Urban Form and Land Supply



- 5.2 The growth management of Auckland's urban areas is considered to be a significant resource management issue. The growth of the urban area's footprint presents a number of environmental matters as raised by Part 2 of the RMA including, water quality, heritage, and biodiversity.
- 5.3 Greenfield growth could be accommodated in a variety of locations and built forms, all of which have differing environmental effects. The evaluation report provides analysis of the various greenfield options considered when defining the notified RUB, based on a broad range of criteria to address the Draft Unitary Plan regional policy statement, the Auckland Plan, and Part 2 of the RMA.
- 5.4 Analysis of alternative RUB locations was undertaken against economic, social and environmental criteria to consider the efficiency and effectiveness of the RUB. The evaluation took into account: the benefits and costs, the risk of acting or not acting, uncertainty, insufficient information. The evaluation report concluded that the preferred alternatives were the most appropriate and necessary and will assist in promoting integrated and sustainable management of Auckland's resources as required under the RMA.

### **Section 32AA of the RMA**

- 5.5 Under section 32AA, a further evaluation must be undertaken in accordance with section 32 where changes have been proposed to the location of the RUB since the original evaluation report was completed (at a level of detail that corresponds to the scale and significance of the changes). A section 32AA evaluation has therefore been undertaken by the Council's area specific planning witnesses in their evidence where they propose that the location of the RUB be amended.

### **Provisions of Part 2 of the RMA**

- 5.6 In terms of Part 2 of the RMA, Section 5 is particularly relevant because the RUB is a key method for managing urban growth both in terms of enabling growth to occur and avoiding, remedying and mitigating adverse effects of growth in a way that achieves sustainable management.
- 5.7 The matters of national importance set out in Section 6 represent values that must be recognised and provided for when considering appropriate locations for growth. Many of these values are represented by overlays in the PAUP, including significant ecological areas and outstanding natural landscapes.

- 5.8 In determining the RUB location, particular regard must also be had to the matters listed in Section 7, including the efficient use and development of natural and physical resources, the intrinsic values of ecosystems, and maintenance and enhancement of the quality of the environment. Section 8 requires the principles of the Treaty of Waitangi to be taken into account, which was addressed at the time of preparing the PAUP through consultation with Mana Whenua.

### **PAUP RPS Objectives and Policies**

- 5.9 As discussed above, the RUB as a method in the RPS is required to achieve the objectives and should implement the policies of the RPS.
- 5.10 The objectives and policies of the entire RPS are relevant to the RUB location, as they relate to growth, economic wellbeing, Mana Whenua, natural resources, and the rural environment. However, the key objectives are those that establish the purpose and role of the RUB in Chapter B:
- (a) a quality compact urban form with a clear defensible limit;<sup>4</sup>
  - (b) sufficient development capacity and land supply to accommodate projected population and business growth;<sup>5</sup>
  - (c) up to 70% of total new dwellings within the metropolitan area 2010;<sup>6</sup>
  - (d) up to 40% outside the metropolitan area 2010 by 2040;<sup>7</sup>
  - (e) development of land zoned future urban within the RUB occurs in a staged, timely and integrated manner aligned with the provision of infrastructure;<sup>8</sup> and
  - (f) growth in towns and serviced villages should be contained within a RUB.<sup>9</sup>
- 5.11 Key growth management policies relevant to the location of the RUB are:
- (a) Avoiding new towns and villages outside the RUB;<sup>10</sup>
  - (b) Require structure planning to rezone future urban land within the RUB;<sup>11</sup>

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<sup>4</sup> PAUP Chapter B2.1 Objective 1

<sup>5</sup> PAUP Chapter B2.3 Objective 1

<sup>6</sup> PAUP Chapter B2.3 Objective 2

<sup>7</sup> PAUP Chapter B2.3 Objective 3

<sup>8</sup> PAUP Chapter B2.3 Objective 4

<sup>9</sup> PAUP Chapter B2.5 Objective 3

<sup>10</sup> PAUP Chapter B2.1 Policy 1A

<sup>11</sup> PAUP Chapter B2.3 Policy 3

- (c) Stage structure planning and rezoning of future urban land having regard to the FULSS and enable coordinated and efficient provision of infrastructure within the RUB including:
  - (i) Logical and integrated sequencing, and alignment with the provision of infrastructure that is planned and has identified funding
  - (ii) Achieves a quality compact urban form and a range of housing choices;<sup>12</sup>
- (d) Require expansion of rural and coastal towns and serviced villages that do not yet have a RUB to be developed in a manner that addresses the listed criteria.<sup>13</sup>

5.12 The growth management strategy is reflected in the objectives and policies of the RPS. Although the strategy has a focus on intensification, it also provides for expansion of the metropolitan area to achieve a balanced approach to growth. However, to achieve the benefits of a quality compact urban form in greenfields, these areas require, management of the adverse effects of urban development on the environment, co-ordination and funding to provide necessary infrastructure.

## **Auckland Plan**

- 5.13 The role of the Auckland Plan in setting the context for the RUB was covered in the Council's evidence for Topic 013, in particular the evidence of Michael Tucker<sup>14</sup> and Ian Bayliss.<sup>15</sup>
- 5.14 Section 79 of the Local Government (Auckland Council) Amendment Act 2009 (**LGCAA**) is relevant to the location of the RUB because it required the Council to prepare a spatial plan to:
- (a) visually illustrate how Auckland may develop in the future, including how growth may be sequenced and how infrastructure may be provided;
  - (b) identify the existing and future location and mix of land uses within specific geographic areas and critical infrastructure, services and investment;
  - (c) identify nationally and regionally significant open space, ecological areas that should be protected;

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<sup>12</sup> PAUP Chapter B2.3 Policy 4

<sup>13</sup> PAUP Chapter B2.5 Policy 1

<sup>14</sup> Evidence of Michael Tucker to Topic 013, 24 November 2014

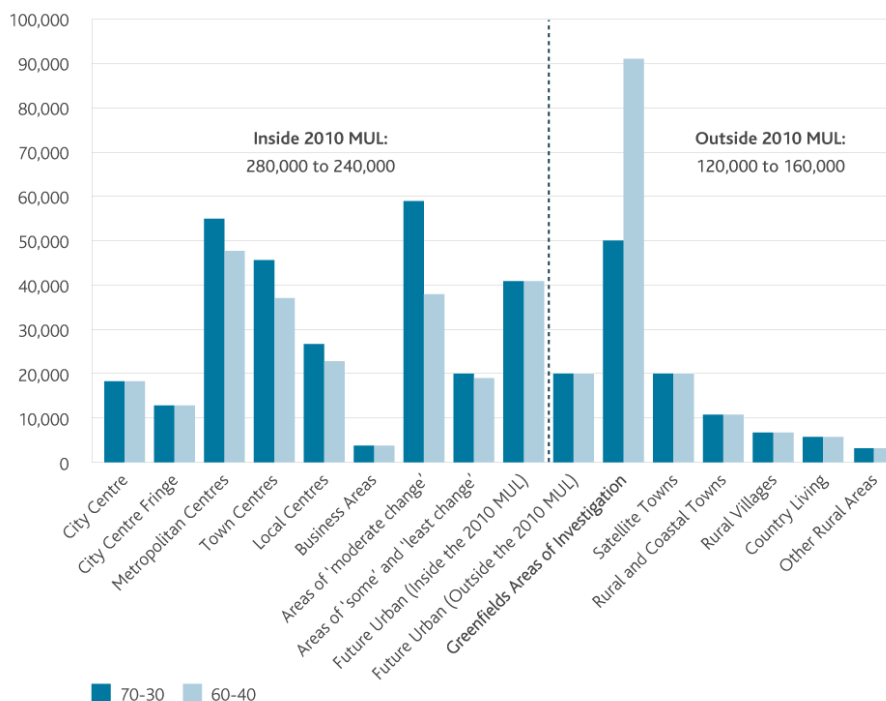
<sup>15</sup> Evidence of Ian Bayliss to Topic 013, 24 November 2014

- (d) identify environmental constraints on development including flood-prone and unstable land; and
- (e) identify landscapes, areas of historic heritage value, and natural features.

5.15 The Development Strategy Map in the Auckland Plan<sup>16</sup> illustrates the spatial plan for Auckland. As discussed in the evidence of Ian Bayliss, the greenfield areas for investigation (**GAFI**) were determined through a process of analysis that sought to address those key elements identified by Section 79 of LGACAA.

5.16 The Development Strategy establishes that Auckland is projected to grow by 400,000 dwellings by 2040 based on a high growth projection and sets a high level approach to accommodating this growth with 240,000 - 280,000 dwellings to be accommodated through intensification within the 2010 metropolitan area; and 120,000 - 160,000 dwellings to be accommodated outside the 2010 metropolitan area (illustrated in Figure 1) below. Business growth is to be provided for largely within the existing business areas in the 2010 metropolitan area and at least 1400ha within greenfield areas.

**Figure 1 Total Anticipated Dwelling Growth 2012-2041**



Source: Figure D9 Auckland Plan

<sup>16</sup> Auckland Plan, Figure D1 Development Strategy Map (Auckland-wide)

- 5.17 Figure 1 illustrates that the Development Strategy focuses growth outside the 2010 metropolitan area in greenfield areas for investigation (50,000 – 90,000 dwellings) and the satellite towns of Pukekohe and Warkworth (20,000 dwellings); with less growth anticipated in the eight rural and coastal towns (11,000 dwellings) and across over 50 rural villages (6,000 dwellings).
- 5.18 In addition to providing capacity for growth, the Development Strategy also establishes other key matters relevant to the location of the RUB such as the importance of integrating land use and infrastructure<sup>17</sup> and prioritising and aligning investment work to achieve transformational change.<sup>18</sup> The Development Strategy seeks to provide for infrastructure in the right place at the right time to facilitate growth.
- 5.19 In identifying the RUB location, Directive 10.4 of the Auckland Plan is particularly relevant because it establishes that greenfields areas are to be located and developed as sustainable liveable neighbourhoods in a way that:
- (a) demonstrates the most efficient use of land;
  - (b) protects and enhances biodiversity, air quality, water quality, and heritage values;
  - (c) provides community facilities, open space, infrastructure (including transport, communications, power and water utilities) in a timely and efficient manner;
  - (d) provides opportunities for walking and cycling, and public transport, and a well-connected street network;
  - (e) provides a broad range of housing choice to cater for the diversity of housing needs in Auckland;
  - (f) provides or supports local employment opportunities;
  - (g) avoids risks from natural hazards; and
  - (h) demonstrates high-quality design with high environmental performance.

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<sup>17</sup> Auckland Plan, D1 Key shapers and enablers

<sup>18</sup> Auckland Plan, Box D3 Creating an Auckland culture that supports transformational change

## **6. OVERVIEW OF COUNCIL'S GROWTH MANAGEMENT STRATEGY**

- 6.1 The evidence presented by the Council at Topic 013 (December 2014) sets out the Council's growth management strategy in Chapters B2.1, B2.3 and B2.5 of the RPS. The strategy seeks to enable quality urban growth while managing the impacts of growth to achieve the sustainable management purpose of the RMA, as set in section 5, and address other Part 2 matters.
- 6.2 I consider the core aspects of the growth management strategy to be:
- (a) Well located land suitable for urban development is not abundant, therefore land identified for future urban growth must be able to be developed efficiently to achieve a quality compact urban form.
  - (b) The RUB is a key method to achieve the objective of a quality compact urban form and is important for protecting environmentally sensitive areas and rural productive land.
  - (c) The RUB should be a defensible, long term rural-urban interface that is not subject to incremental change to provide long term certainty about the extent of the urban area to enable planning and investment for infrastructure to support new growth areas.
  - (d) The integration of land use and infrastructure is critical to enable growth – bulk infrastructure is expensive and often has a long lead in time therefore aligning infrastructure with growth is essential to provide infrastructure in the right place at the right time.
  - (e) Approximately 11,000ha of land is zoned FUZ within the RUB providing sufficient land supply to accommodate projected population growth to 2040.
  - (f) The FULSS will ensure efficient planning for the provision of publicly funded infrastructure to maintain sufficient unconstrained (ready to go) development capacity to accommodate a minimum of 5 years growth at any one time will be required.
  - (g) The Council can change the RUB if necessary in response to monitoring of development and land supply uptake.
  - (h) A balanced approach to providing for growth is supported by encouraging greater residential intensification within the 2010 metropolitan area supported

by some greenfield expansion contiguous to the urban area and in satellite towns.

- (i) Providing for up to 40% of growth outside the 2010 metropolitan area recognises that achieving the 70% intensification target will require a generational shift that may be difficult and therefore additional growth is provided for within greenfields if this aspiration cannot be met.

6.3 The location of the RUB is a crucial element to achieving the Council's growth management strategy because it determines the future urban form and supports the necessary forward planning to be undertaken in advance of implementing growth by providing direction and certainty. The importance of this certainty to achieve a quality compact urban form and associated benefits is discussed in the evidence of Douglas Fairgray for this Topic and his evidence for Topic 028,<sup>19</sup> outlining that the RUB, the FUZ) and the FULSS all work together to manage Auckland's expansion.

6.4 The interim guidance on Topic 013<sup>20</sup> released by the Panel in February 2015 supports a number of the key aspects of the Council's growth management strategy. In particular the interim guidance suggests:

- (a) The objective of a quality compact urban city is appropriate;
- (b) A RUB is the most appropriate method to achieve the objective of a quality compact urban city;
- (c) The principal feature of a RUB is that urbanisation outside it is to be avoided; and
- (d) The basis for establishing or changing the RUB should be determined by the efficient provision (including on a timely basis) of infrastructure.

6.5 Whilst the interim guidance is consistent with the Council's strategy about these key matters, a number of other matters that are not specifically supported in the interim guidance are also key to the Council's growth management strategy and the establishment of the RUB location. These include:

- (a) The RUB as a RPS method that is not subject to incremental changes;

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<sup>19</sup> Evidence of Douglas Fairgray to Topic 028 Future Urban, 20 February 2015

<sup>20</sup> Auckland Unitary Plan Independent Hearings Plan, Interim Guidance Text for RPS Topic 013: PAUP Sections B2.1- providing for growth in a quality compact urban form and B2.3 – Development capacity and supply of land for urban development (23 February 2015)

- (b) Integration of land use and infrastructure; and
- (c) Excluding areas not suitable for development from within the RUB;
- (d) Including criteria within the RPS to change the RUB.

6.6 In my view these outstanding matters are critical elements of the growth management strategy because they enable growth in a way that achieves sustainable management of natural and physical resources consistent with section 5 of the RMA. I therefore discuss each matter in turn below.

## 7. THE RUB AS A RPS METHOD

- 7.1 The interim guidance indicates that the RUB maps should be at the district plan level rather than in the RPS to provide flexibility and opportunity for private plan changes.<sup>21</sup> I consider this to be a fundamental issue for the growth management strategy in the PAUP because urban growth is an issue of regional significance. In my view, if the RUB is accepted to be the most appropriate method to achieve a quality compact urban form then it should be retained within the RPS.
- 7.2 Locating the RUB at the PAUP district plan level would create a soft edge, making it subject to private plan changes. The implications of a soft edge are discussed in detail in the evidence of Douglas Fairgray, where incremental change would mean greater opportunity for piecemeal development, less certainty about urban form, and correspondingly reduced opportunity for efficiencies in provision of infrastructure. I do not support the RUB as a soft edge because the lack of certainty erodes the ability to undertake the comprehensive and integrated forward planning necessary to achieve the objective of a quality compact urban form and the benefits that go with it.
- 7.3 Concerns about the implications of constraining urban development through the application of urban limits on housing affordability have been raised by the Productivity Commission.<sup>22</sup> In this context it is important to recognise that the RUB is not the same as the previous Metropolitan Urban Limit (**MUL**) in the operative Auckland Regional Policy Statement, which sought to constrain growth to incentivise intensification targets.

<sup>21</sup> The maps identifying the location of the RUB should be plan provisions and not included in the RPS. In order to provide appropriate flexibility so that timely responses to growth pressure can occur, opportunity for private plan changes to include areas within the RUB must be available. (IHP Interim Guidance, February 2015, pp8)

<sup>22</sup> NZ Productivity Commission, Housing Affordability, March 2012 (pp.115-17)



- 7.4 In contrast to the MUL, the RUB identifies approximately 11,000ha of land for future urban development, providing greater flexibility for greenfield growth. This is supported by increased intensification opportunities within the existing metropolitan area to better achieve the 70% intensification target through changes to the residential development controls in Topic 063 Residential rules. The development capacity available within the proposed RUB, including residential intensification within the metropolitan area, are discussed in the evidence of Douglas Fairgray, and in light of his evidence I do not consider there to be any identified need at this stage to provide for more greenfield land in the RUB beyond that proposed by a number of the Council's planning witnesses in their area specific evidence.
- 7.5 The evidence of Dawne Mackay outlines the Council's monitoring programme to measure the uptake of development capacity and land supply through the Annual Monitoring Report of the Auckland Plan's Development Strategy. In addition to identifying the need to reprioritise infrastructure investments by reviewing the FULSS, this monitoring programme would also identify when additional development capacity and land supply is needed to meet projected growth. In my view, this is the most appropriate method to determine when a change is required to the RUB, rather than through ad hoc private plan changes.
- 7.6 I accept that the RUB needs to be responsive to growth pressures into the future and that it may need to be changed at some stage. However, I consider it most appropriate for such changes to be undertaken by the Council in response to monitoring of development capacity and land supply within the policy framework of the RPS.
- 7.7 The RUB is a key method for managing urban growth. I therefore do not support locating the RUB at the PAUP district plan level because in my opinion it is more effective to address regionally significant issues, such as urban growth, at the RPS level. I consider the most appropriate location for the RUB maps is in the RPS because this will ensure greater certainty to enable managed growth to achieve the objectives and policies of the RPS and Part 2 of the RMA. In addition, in my view retaining the RUB at the RPS level will achieve the strategic integration of infrastructure with land use enabling prioritisation and alignment of investment in growth areas in accordance with the Council's regional functions under section 30.

## 8. INTEGRATION OF LAND USE AND INFRASTRUCTURE

- 8.1 The interim guidance recognises that a key criterion for establishing or changing the RUB should be the ability to efficiently provide infrastructure on a timely basis,<sup>23</sup> and that the provision of infrastructure is a core principle of structure planning.<sup>24</sup> However, it does not explicitly refer to the importance of land use and infrastructure integration in achieving a quality compact urban form or recognise that there is some bulk infrastructure that developers cannot provide.
- 8.2 Alignment of investment in infrastructure with growth is a core principle of the Auckland Plan Development Strategy, recognising that the integration of land use and infrastructure is critical to unlock the vision of the world's most liveable city.
- 8.3 Transport in particular is identified as having the strongest influence on the urban form and it is important that the relationship between determining the location of the RUB and transport is more fully recognised. Otherwise it is difficult to provide an efficient and effective transport network to service growth areas. This issue has been addressed previously in the evidence of Kevin Wright<sup>25</sup> and Don Munro<sup>26</sup> in Topic 013 and is also addressed in the evidence of Joshua Arbury and the joint statement of evidence of Theunis van Schalkwyk, Evan Keating, Alastair Lovell and Scott MacArthur (joint statement of evidence from Auckland Transport). Further explanation of the importance of integrating land use and transport is illustrated in the evidence of Joshua Arbury through the transport principles considered when defining the notified RUB.
- 8.4 A number of submitters raised concerns at the Topic 013 hearing that the Council's growth strategy was being led by infrastructure rather than the other way round. I agree that it is important to consider the most appropriate urban form when determining the location of the RUB. However, in my view the consideration of appropriate areas for growth cannot be separated from the consideration of the infrastructure that is necessary to service it.

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<sup>23</sup> The basis for establishing or changing the RUB should be determined by criteria in the RPS which include at least the following:

- a. A feasible developable area
- b. Infrastructure able to be provided efficiently (including on a timely basis) and resiliently; and
- c. An appropriate time frame for development. (Interim guidance, February 2015, pp6)

<sup>24</sup> Core principles of structure planning in the PAUP should be:

- a. A quality compact urban form with a range of housing or employment choices needs to be provided; and
- b. The promoters of the structure plan are responsible for ensuring infrastructure needed to serve the land is provided in a timely manner. (Interim guidance, February 2015, pp7)

<sup>25</sup> Evidence of Kevin Wright to Topic 013, 24 November 2014

<sup>26</sup> Evidence of Don Munro to Topic 013, 24 November 2014

- 8.5 The New Zealand Council for Infrastructure Development (**NZCID**) has come out strongly for a more 'planned-led' approach to urban development with national and regional spatial planning that establishes not only the appropriate policy framework but also what investments are needed and how they will be funded.<sup>27</sup> The NZCID see consistent direction on long term infrastructure strategy as critical to improving urban development in New Zealand.<sup>28</sup>
- 8.6 Major infrastructure required to service growth has significant funding implications (and social costs) that cannot simply follow growth in a timely integrated way. Therefore, the scale of major infrastructure and the feasibility of delivering it within the 30 year timeframe are key determinants of growth. This is about the efficient and cost effective provision of infrastructure, as discussed in the evidence of Joshua Arbury, to achieve the best value for the investment that is required.
- 8.7 The PAUP does not seek to control growth through infrastructure, but enable growth by identifying a long term RUB to give certainty to infrastructure providers and landowners about where growth is going to occur to enable appropriate forward planning. The FULSS then identifies the anticipated sequencing of growth within the RUB reflecting the time that is needed to plan for the scale of infrastructure required in the later part of the 30 year timeframe as outlined in the evidence of Dawne Mackay.
- 8.8 The FULSS only looks at bulk infrastructure because this is the infrastructure that generally cannot be provided by individual developers and cannot be provided on an ad hoc basis so it needs the certainty of a hard RUB to enable forward planning. This is illustrated in the joint statement of evidence from Auckland Transport whereby the costs of funding bulk infrastructure cannot be fully recouped through development contributions, and also the joint statement of evidence from David Blow, Chris Allen and Andre Stuart for Watercare (joint statement of evidence from Watercare) whereby developers pay for local network infrastructure not for trunk infrastructure such as regional plants and transmission pipes. In addition, the evidence of Philip Jaggard discusses the costs of providing stormwater infrastructure and the importance of coordinating these so that infrastructure is not provided in places where development does not occur.

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<sup>27</sup> Stephen Selwood, Integrated governance, planning and delivery - presentation at Building Nations Symposium, August 2015

<sup>28</sup> Significant opportunities to improve urban development in NZ, media statement, NZCID 26 August 2015  
[http://www.nzcid.org.nz/Story?Action=View&Story\\_id=119](http://www.nzcid.org.nz/Story?Action=View&Story_id=119)

- 8.9 In my opinion, it is good planning practice to consider the integration of land use and infrastructure to consider whether it is efficient and effective to provide bulk infrastructure to an area within the 30 year timeframe as part of establishing the location of the RUB. As such, consideration does have to be had to existing funding commitments, while also acknowledging that funding will need to be found. What the Auckland Plan seeks to do is to achieve more with less, this is the benefit of the amalgamated city, and this requires prioritisation and alignment of investment in infrastructure.

## **9. EXCLUDING AREAS NOT SUITABLE FOR DEVELOPMENT**

- 9.1 The interim guidance indicates that the purpose of the RUB should not be to identify areas for development or where development should not occur.<sup>29</sup> Whilst I agree that not all areas of land within the RUB would be suitable for development and that these can be protected using specific controls (such as overlays), there are many matters that the Council has to balance in providing for growth and protecting environmental values to achieve Part 2 of the RMA. This is a key aspect of the Council's growth management strategy.
- 9.2 To determine the most appropriate location of the RUB it is necessary to consider the factors required to achieve a quality compact urban form, as set out in Directive 10.4 of the Auckland Plan and discussed in paragraph 5.19 above. A critical element is that greenfield locations demonstrate the most efficient use of land, consistent with Section 7(b) of the RMA.
- 9.3 Mr Bayliss discusses the scarcity of land suitable for urban development in the Auckland Region due to geography and environmental constraints and the trade-offs considered in determining the appropriate location of the RUB, and thereby areas for urban development. There are some areas that are appropriately avoided because they would not achieve the most efficient use of land, whereby the yield of development would not warrant the level of investment required to service the area and/or outweigh the resulting adverse environmental effects caused by development.
- 9.4 Recognising that to achieve sustainable management the growth management strategy needs to also protect environmental values leads to the fact that the RUB does have a role in identifying land that should not be urbanised. In my opinion this

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<sup>29</sup> The purpose of a RUB should not be to identify areas for development or where development should not occur. Areas where development should not occur ought to be specifically identified and assessed on their own merits and then listed and protected using specific controls in the appropriate plan (IHP Interim guidance, February 2015, pp4)

is aligned with the interim guidance that ‘the principal feature of a RUB is that urbanisation outside it is to be avoided.’<sup>30</sup>

- 9.5 There will be land beyond the RUB that may be efficient to develop at some time in the future, but at present the RUB identifies approximately 11,000ha of land considered to be the most efficient to develop now and within the next 30 years.
- 9.6 I consider it appropriate to recognise that there are areas excluded from the RUB because they are not suitable for development and that it is appropriate for the RUB to be used as a tool to provide certainty and long term protection of these areas. The following examples illustrate this point:
- (a) Protecting elite and prime soils seeks to avoid the encroachment of urban growth to protect the rural productive value of that land in accordance with the sustainable management purpose set out in Section 5 of the RMA. The importance of elite and prime soils was discussed in the evidence of Fiona Curran-Cournane to Topic 011: “this will ensure a self-sufficient and resilient food producing region now and into the future”.<sup>31</sup> Considering the impact of growth on rural productivity is a key aspect of the Council’s growth management strategy as outlined in the evidence of Douglas Fairgray to Topic 028.<sup>32</sup> The economic value of rural land is increased by the certainty provided by the RUB that land outside the RUB will not be developed.
  - (b) Some areas can be highly constrained by environmental values that are not necessarily scheduled or able to be protected by scheduling because it is the consideration of overlapping environmental values that create an environment sensitive to the effects of urban development rather than a specific feature of the environment. Where urban development encroaches into catchments that are not currently urbanised or do not contain much urban development the potential to create significant adverse effects on the receiving environment needs to be considered. The Auckland Plan Scenario Evaluation considered a series of urban form scenarios concluding that urbanisation should be avoided in the most highly valued and sensitive areas in order to protect coastal and natural environments from the impacts of land use activities.<sup>33</sup> Therefore where possible

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<sup>30</sup> Interim Guidance on Topic 013, February 2015, pp3

<sup>31</sup> Evidence of Fiona Curran-Cournane to Topic 011, 15 May 2015 (pp 1.3)

<sup>32</sup> Evidence of Douglas Fairgray to Topic 028, 20 February 2015

<sup>33</sup> Section 32 Report for the Auckland Unitary Plan: Appendix 3.1.5a - Auckland Plan Scenario Evaluation Workstream Technical Report, September 2011 (p78)

it is best to avoid development in catchments and areas that are not currently developed and are still of good quality.

- 9.7 To achieve the sustainable management purpose of the RMA when determining urban form and the appropriate location of the RUB there are a series of trade-offs that need to be made between providing for rural productivity, environmental protection, and efficiently providing for growth. On balance avoiding development in some areas will achieve a better overall outcome and require other areas to be identified for growth where the trade-offs are less significant. To achieve efficient use of land sufficient yields are needed to justify and outweigh the costs of environmental mitigation and infrastructure provision.
- 9.8 I consider it appropriate at a strategic level to exclude large areas of land identified as not being suitable for urban development to be excluded from the RUB to provide greater certainty, and to achieve the sustainable management purpose of RMA and the efficient use of land in accordance with Sections 5 and 7.

## **10. RPS CRITERIA TO CHANGE THE RUB**

- 10.1 The interim guidance considers the RUB to set a threshold for change and suggests a minimum of seven years of developable capacity should be provided within the RUB. Coupled with this is the Panel's view that criteria should be included at the RPS to guide changes to the RUB to include at least:
- (a) A feasible developable area;
  - (b) Infrastructure able to be provided efficiently (including on a timely basis) and resiliently; and
  - (c) An appropriate time frame for development.<sup>34</sup>
- 10.2 In my evidence to Topic 013<sup>35</sup> I did not support the inclusion of criteria to change the RUB because I considered the approximately 11,000ha identified as FUZ to be more than sufficient to meet projected growth at this early stage of the 30 year timeframe, and because, if necessary, the Council can change the RUB.
- 10.3 Having considered the issue of criteria to change the RUB further, I have changed my position and I now support the inclusion of criteria in the RPS to establish the location of the RUB. In my view this would provide a clear policy framework to

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<sup>34</sup> Interim guidance to Topic 013, February 2015, pp6

<sup>35</sup> Evidence of Chloe Trenouth for Topic 013, dated 24 November 2014

support the location of the RUB, which is currently missing from Chapter B2.1 of the RPS. It would provide greater transparency and certainty to plan readers of the process that the Council will undertake to change the RUB if required. This is consistent with the evidence to Topic 013 presented by Dave Sergeant on behalf of the Southern Gateway Consortium (4545-4), which provides scope to consider the issue of criteria.

- 10.4 In determining an appropriate policy to set out the criteria for establishing the location of the RUB I have considered the interim guidance on best practice approaches for changes to the RUB released in July 2015.<sup>36</sup> Overall, I consider these best practice approaches to be generally consistent with the principles and criteria used to determine the RUB location in the PAUP, as outlined in the evidence of Mr Bayliss, and they therefore form a good basis for the RPS policy. However, I also consider there to be a number of other matters that need to be addressed by the criteria to achieve the objectives of the RPS specifically:
- (a) Identifying a defensible boundary to provide a hard edge to 2040;<sup>37</sup>
  - (b) Importance of land use and transport integration in defining urban form;<sup>38</sup>
  - (c) Understanding the environmental constraints to be balanced with the ability to efficiently provide for growth; and<sup>39</sup>
  - (d) Supporting rural productivity.<sup>40</sup>

<sup>36</sup> Interim guidance, Best practice approaches to rezoning, precincts and changes to the Rural Urban Boundary, 31 July 2015

<sup>37</sup> PAUP B2.1 Providing for urban growth in a quality compact urban form – Objective 1 A quality compact urban form with a clear defensible limit (Rural Urban Boundary RUB) to the urban expansion of the metropolitan area, satellite towns, rural and coastal towns and serviced villages

<sup>38</sup> PAUP Chapter B3.3 Transport Objective 2 - An effective, efficient and safe integrated transport system that is integrated with, and supports, a quality, compact form of urban growth and associated land use

<sup>39</sup> PAUP Chapter B6.3 Freshwater and Geothermal Water Objective 1 - The natural, social, economic and cultural values of freshwater and geothermal water resources are safeguarded or provided for when land, freshwater and geothermal water is used and developed;

B6.7 Natural Hazards – Objective 1 Do not increase risk to people, property and infrastructure from natural hazards and reduce risks where possible, while minimising any adverse effects on the environment;

B7.1 Subdivision, use and development in the coastal environment – Objective 1 Subdivision, use and development in the coastal environment is located in appropriate areas, and is of an appropriate form, taking into account the range of uses and values of the coastal environment;

B4.3.1 Natural character of the coastal environment – Objective 1 Subdivision, use and development is designed, located and managed to preserve the natural characteristics and qualities that contribute to the natural character of the coastal environment, wetlands, lakes and rivers and their margins;

B4.3.2 Landscape and natural features- Objective 7 Landscapes and features not identified as outstanding but which display particular values, sense of place or identify and high amenity value, are maintained and enhanced;

B4.3.3 Trees and vegetation – Objective 2 The contribution of trees and vegetation to the maintenance of indigenous biodiversity, and the provision of ecosystem services including soil conservation, water quality, stormwater control and the mitigation of natural hazards is recognised and enhanced

B4.3.4 Biodiversity – Objective 1 Areas of significant indigenous biodiversity in terrestrial, freshwater, and coastal environments are protected from the adverse effects of subdivision use and development.

B4.3.5 The Waitakere Ranges Heritage Area – Objective 5 The character, scale and intensity of subdivision, use or development does not adversely affect the area's environment, heritage features or contribute to urban growth outside the RUB;

B5.1 Mana Whenua – Objective 1 The principles of the Treaty are recognised and provided for in the sustainable management of ancestral lands, water, air, coastal sites, wāhi tapu and other taonga, and natural and physical resources.

10.5 I propose inclusion of the following policy in Chapter B2.1 of the PAUP to set out the criteria that needs to be applied when establishing the RUB:

Ensure the location of the RUB and any future changes to the RUB promotes the achievement of a quality compact urban form by identifying land suitable for future urban growth in locations that:

- (a) enable the efficient provision of development capacity and land supply for residential, commercial and industrial growth;
- (b) support the provision of feasible, efficient and cost effective infrastructure;
- (c) integrate land use and transport, supporting modal shift towards public transport, walking and cycling;
- (d) avoid the Waitakere Ranges Heritage Protection Area and scheduled areas with significant environmental, heritage, Mana Whenua, natural character or landscape values;
- (e) ensure significant adverse effects from urban development on the environmental and Mana Whenua values of receiving freshwater and coastal environments are avoided, remedied or mitigated;
- (f) avoid elite land and avoid where practicable prime land to support rural production activities;
- (g) avoid mineral resources that are commercially viable;
- (h) avoid areas with significant natural hazard risks and where practicable avoid areas prone to natural hazards including coastal hazards and flooding;
- (i) avoid where practicable conflicts between residential activities and infrastructure or rural activities;
- (j) provide a clear defensible limit to urban expansion by aligning the location of the RUB with:
  - i. strong landscape features or physical boundaries such as the coastal edge, natural catchments or watersheds, and prominent ridgelines; or
  - ii. where elements listed in (i) above are not present then other elements such as streams, wetlands, road boundaries, high tension power lines/corridors, identified outstanding natural landscapes, airport flight paths, significant ecological areas, or property boundaries.

10.6 In my opinion the proposed policy is the most appropriate method to achieve the objectives of the RPS, to achieve a quality compact urban form, as well as other objectives including natural heritage, Mana Whenua, natural resources, coastal environment, and rural environment. The proposed policy appropriately provides for the sustainable management to enable growth while addressing Part 2 matters, particularly matters of national importance in section 6 and the efficient use and development of natural and physical resources in section 7. In addition, the

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<sup>40</sup> PAUP Chapter B8.1 Rural Activities – Objective 3 Auckland’s rural areas outside the RUB, and rural and coastal towns and villages, are protected from inappropriate subdivision, urban use and development; B8.2 Land with high productive potential – Objective 1 The subdivision, use and development of elite and prime land is managed to maintain its capability, flexibility and accessibility for primary production.



proposed policy is consistent with the Auckland Plan Development Strategy and Directive 10.4 of the Auckland Plan.

## **11. METHODOLOGY FOR ASSESSING SUBMISSIONS**

- 11.1 Prior to the Panel releasing interim guidance on the best practice approaches to changes to the RUB , the Council had developed and applied a set of RUB assessment criteria for considering submissions about the location of the RUB.
- 11.2 The Council's RUB criteria are attached (**Annexure B**). These 11 criteria were developed using the RUB principles and criteria that were applied by the Council when determining the location of the RUB in the notified PAUP. These principles and criteria are outlined in the evidence of Ian Bayliss for this topic, and discussed further in the evidence of Mr Bayliss for Topic 013.<sup>41</sup>
- 11.3 The July 2015 interim guidance states that parties should ensure that any evidence provided for the hearings on the RUB clearly and succinctly addresses the matters set out in the best practice approaches for changes to the RUB.
- 11.4 In my view the RUB criteria developed by the Council are consistent with the best practice approaches set out in the interim guidance, and assessment against these criteria achieves consistency between the establishment of the notified RUB and the proposed changes to the RUB in response to submissions. To assist the Panel I have reviewed the Council's RUB assessment criteria against the best practice approaches to demonstrate the consistency in Annexure B.
- 11.5 In addition to the six best practice approaches, the Council's RUB criteria reflect the four additional matters that are important to the growth management strategy as discussed previously in this evidence at paragraph 10.4.
- 11.6 The methodology used by the Council's planning witnesses in their area specific evidence responding to submissions requesting changes to the RUB is to group submissions into sub-groups, and assess these against the RUB assessment criteria in Annexure B. This approach provides a transparent mechanism to test whether land is appropriate for urban development and whether inclusion of the land within the RUB can achieve the objectives and implement the policies of the RPS.

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<sup>41</sup> Evidence of Ian Bayliss to Topic 013, 24 November 2014

11.7 The first four criteria used by the Council are considered to be the most important to determine whether land is appropriate for urban development and therefore have a higher weighting than the other criteria. This is because if these criteria are not met then the inclusion of land within the RUB in that location is unlikely to achieve the objective of a quality compact urban form with a clear defensible limit to urban expansion or meet the other applicable statutory tests discussed in section 5 of my evidence. The first four criteria require consideration of whether the proposed change to the RUB:

- (a) Is contiguous to the existing urban area or FUZ as notified in the PAUP;
- (b) Is aligned with the Auckland Plan Development Strategy;
- (c) Provides a defensible boundary; and
- (d) Is consistent with relevant legislation, plans and policies (i.e. Waitakere Ranges Heritage Area Act, Hauraki Gulf Marine Park Act, New Zealand Coastal Policy Statement)

11.8 The remaining criteria must be considered on an area-by-area basis and are not considered to have a hierarchy. Assessment against these criteria will involve a series of trade-offs and decisions to balance these to achieve Part 2 of the RMA. Some of these trade-offs are discussed in the evidence of Mr Bayliss to Topic 013<sup>42</sup> in the context of determining the notified RUB.

11.9 In my opinion assessment of submissions against the Council's RUB criteria is appropriate because the criteria provide a filter to consider submissions against all the relevant RPS objectives and policies. These include broader consideration of the environmental values beyond only those scheduled; recognition of the importance of rural productivity beyond simply protecting elite soils; the importance of a defensible boundary to manage growth and achieve a quality compact urban form. In addition, I consider the RUB criteria to be consistent with Directive 10.4 of the Auckland Plan to achieve sustainable liveable communities in greenfields.

## **12. CONCLUSION**

12.1 The location of the RUB is a critical part of the Council's growth management strategy and as a method it is most appropriately retained at the RPS level. Urban growth is a regionally significant issue and greater certainty is provided by a hard

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<sup>42</sup> Evidence of Ian Bayliss to Topic 013, 24 November 2014

RUB that is not subject to incremental changes to achieve a quality compact urban form and the benefits that go with it. The RUB is a more efficient and effective method to achieve the objectives of the RPS if it is retained at the RPS level. It provides greater certainty to enable managed growth and achieve the objectives and policies of the RPS and strategic integration of infrastructure with land use in accordance with regional functions in section 30 of the RMA.

- 12.2 Including a proposed policy within Chapter B2.1 to set out the criteria for determining the location of the RUB provides a clear policy framework to support the RUB and certainty of the process the Council will undertake to change the RUB if required. The proposed policy achieves the relevant objectives of the RPS, including B2.1 Objective 1, as well as the broader environmental objectives.
- 12.3 Assessment of the submissions requesting changes to the RUB against the Council's RUB criteria provides an appropriate filter to consider whether land to be included within the RUB and identified for future urban development will achieve the relevant RPS objectives and policies, and Part 2 of the RMA.

Chloe Trenouth

14 October 2015

## ANNEXURE A

<b>Career Summary</b>	Senior Consultant Planner, Hill Young Cooper Ltd: 2012 Principal Strategic Planner, Auckland Council:2010-2012 Strategic Policy Analyst, Auckland Regional Council: 2009-2010 Senior Consultant Planner, Hill Young Cooper Ltd: 2004-2009 Resource Planner, Waitakere City Council: 2002-2004 Development Control Planner, Londone Borough of Haringey (UK): 2001-2001 Policy Planner, London Borough of Hounslow (UK: 2001 Policy Analyst, Ministry for the Environment: 1998 - 2000
<b>Qualifications</b>	Bachelor of Planning, University of Auckland
<b>Affiliations</b>	Member NZPI

## ANNEXURE B – RUB ASSESSMENT CRITERIA

Council RUB criteria	Best Practice Principles
1. Change is contiguous with existing urban area or Future Urban Zone as notified in the PAUP	
2. Aligned with Auckland Plan Development Strategy (reflected in RPS policies / planning principles for the RUB)	<p>3.1 The change enables the efficient provision of development capacity and land supply for residential, commercial and industrial growth</p> <p>3.2 The change promotes the achievement of a quality compact urban form</p>
3. Provides a defensible boundary (based on water catchment boundaries, visual catchment boundaries, major roads or transport routes, land protected from development / public reserves)	3.6 The RUB should aim to follow property boundaries
4. Consistent with relevant legislation, plans and policies (i.e. Waitakere Ranges Heritage Areas, Hauraki Gulf Marine Park, NZCPS, Treaty settlements)	3.4 The change avoids: b. the Waitakere Ranges Heritage Protection Area
5. Consistent with the protection of important environmental values and avoids scheduled areas (i.e. SEA, ONL, HNC, ONF, significant indigenous vegetation, heritage sites)	3.4 The change avoids: a. scheduled areas with significant environmental, heritage, Maori, natural character and landscape values
6. Provides for the relationship of Maori and their culture and traditions with ancestral lands, water, sites, waahi tapu	3.4 The change avoids: a. scheduled areas with significant environmental, heritage, Maori, natural character and landscape values
7. Avoids areas subject to natural hazard areas where possible (flooding, instability, liquefaction)	3.5 The change avoids, where possible: a. areas prone to natural hazards, including coastal hazards
8. Avoids productive land (elite and prime soils), significant mineral resources, aquifers and recharge areas (particularly where required for rural production)	3.4 The change avoids: c. mineral resources that are commercially viable d. elite soils
9. Contributes to the effective and efficient provision and use of infrastructure (transport, social infrastructure, water and wastewater)	3.3 Where moving the RUB results in rezoning, the provision of infrastructure is feasible
10. Offers opportunities for particular types or mix of types of residential / business development	<p>3.1 The change enables the efficient provision of development capacity and land supply for residential, commercial and industrial growth</p> <p>3.2 The change promotes the achievement of a quality compact urban form</p>
11. Land use continuity and compatibility - does not conflict with adjoining land uses, scale enables integrated planning	<p>3.5 The change avoids, where possible</p> <p>b. conflicts between residents and infrastructure</p>