



## **Submission of Civic Trust Auckland**

### **Auckland Council Draft Annual Plan 2011/2012**

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#### **Civic Trust Auckland**

Civic Trust Auckland is a non-profit public interest group, incorporated in 1968, with activities and interests throughout the greater Auckland region.

The aims of the Trust include:

- Protection of natural landforms
- Preservation of heritage, in all its aspects
- Encouragement of good planning for the city and region.

We have made representations on a number of recent draft documents and issues as follows:

- ARC Draft Regional Parks Management Plan
- Draft Auckland Regional Public Transport Plan
- Building Competitive Cities
- Mining in Schedule 4 (conservation land)
- Waikato District Council 2010/11 Draft Annual Plan - roading / projects
- Hamilton City Council 2010/11 Draft Annual Plan Section 4.6 (Transportation)
- Draft Auckland Peace City Declaration
- Newmarket Park
- Shared Use of Tamaki Drive Forum
- Lorne St upgrade
- Rutland St upgrade
- Victoria Quarter
- Tepid Baths
- Turua Street houses
- Rosebank Rd oak and pohutukawa trees.

The Trust is affiliated to a number of other NGOs concerned to protect our built and/or natural heritage. To a certain extent, the Trust's views are aligned with the views of these groups.

#### **Auckland as a Liveable City**

Auckland's reputation as a liveable city is due in large part to its land and harbour amenity values: the regional parks, the volcanic cones and the beaches. We benefit from a temperate climate, and, largely on account of our geographical location, live in what has been rated the most peaceful country in the world.

Much of the contemporary built urban environment of Auckland has little to commend it. For the tourist there is little architecture of merit due to the huge loss of heritage amenity in recent decades, in part due to Council not fulfilling its duty to recognise and protect heritage. For

many residents, a bleak urban environment forms part of our daily experience and has an effect on our wellbeing. For the commuter, the spread-out nature of the city and the inadequate public transport service, as well as unwillingness of large numbers to use public transport, make travel during peak times a regular exercise in frustration.

We offer the following observations from "The Cities and their People - New Zealand's Urban Environment" (June 1998)

This report:

- found that there have been losses of heritage and amenity values and adverse effects on the well-being of people and communities
- recognised that "liveability" stems from a combination of amenity values (including design features), historic and cultural heritage and intangible attributes such as character and "sense of place"
- recognised that many urban residents place a high value on amenity values and their contribution to improving the quality of urban life
- identified that liveability issues and the importance of good urban design are not adequately recognised in management approaches, policy or legislation.

Civic Trust Auckland (CTA) looks forward to planning that responds to the needs of Aucklanders, respects their aspirations, and, above all, delivers good outcomes for our city now and for the future. Our submission covers a number of subjects across the Auckland region involving most parts of the Annual Plan.

## **Vol 1 - Part 2**

### **Page 60**

This page states that, "The council also protects and enhances Auckland's natural environment and ecology through developing and maintaining its parks, and by preserving and protecting the region's natural features such as its volcanic landscape and the Hauraki Gulf islands".

CTA recognises and celebrates Auckland's regional parks as highly valuable assets for the region. The ARC managed the parks well. The ARC Draft Regional Parks Management Plan should be adopted in its entirety by Auckland Council.

As stated in its submission on the ARC draft parks plan, CTA wishes to be consulted on any proposals of transfer of management and in general oppose any transfers away from public ownership.

As a community group with aims that are relevant to the development and maintenance of the parks, CTA wishes to be consulted about Council's development and maintenance of parks, especially as regards heritage.

CTA would like to see the volcanic cones in the Auckland region incorporated as future regional parks.

We would like to see Council support and promote research into and restoration of native fish including attention to water quality and temperature from road run-off, swimming pool discharge and pet management in streams and sensitive reserves

We would like to see Council strengthen efforts to support bush, coast and stream restoration and to reduce the costs and work effort by improving controls on pest plants and fauna across the region.

CTA advocates for smoke free parks and public open spaces.

Much of the work that maintains the high quality of our natural environment has been undertaken by volunteers in the community, often in partnership with Council. There are many community groups and individuals across the region who do tireless work in their local area, such as self-appointed volunteers who do weeding on public land, and community groups such as Friends of Maungawhau. Such groups have developed expertise and local knowledge and deserve recognition and support.

CTA supports the submission of Friends of Maungawhau, particularly the following points:

- With growing population and demands increasing pressure is being placed on public parks and greater citizen involvement is needed.
- Regarding the performance measure of for "Total hectares of local parkland and sports fields per 1000 residents as an indicator of level of access to local parks, reserves and sports fields" for "Develop the regional and local park network to cater for future growth and community needs", the addition of the words "publicly accessible parkland".
- For Volcanic Cones (vol 1 pg 76) to replace "Percentage of volcanic landscape maintenance standards achieved based on contract requirements" with "number of professional rangers working with the community" and "public attendance at community and iwi events covering cultural and heritage importance of the volcanic cones.
- Volunteers are a strong force in supporting parks and heritage (Vol 1 pg 133) and are involved in both regional and local parks and need support and leadership. Long term volunteers are essential in areas such as pest control and care of areas out side the resources and priorities of Council.
- The concentration of more events on parks (Vol 1 pg 68) may restrict public access and may be carried out without considering the heritage and conservation impacts.

CTA further supports a park ranger service being retained as a direct function of the new Auckland Council and not contracted out.

As a tangible idea for the development of outdoor performance space, CTA supports the investigation of transforming the southern end of Myers Park's natural amphitheatre into a live performance space.

We are opposed to the introduction of more elephants to Auckland Zoo, as proposed by the previous Council, due to the related costs as well as on humanitarian grounds.

CTA would like to see the reinstatement of bush preservation zoning on private land around bush reserves such as Le Roys Bush to address the loss of protection arising from the 2009 RMA amendment which threatens to remove the tree and bush protections of zoning such as Residential 2B.

#### **Page 84**

Under the subject Economic Development we offer the following quote from Reports relating to Heritage by the Parliamentary Commissioner for the Environment:

"The historic environment is an irreplaceable asset representing the investment of centuries of skills and resources. It gives places a unique competitive advantage. It generates jobs. It attracts people to live in an area, businesses to invest and tourists to visit. Most of it is in everyday use; it is capable of an economic future; it is an asset we squander or degrade at our peril."

Power of Place. English Heritage (2000)

We note that cycling has benefits for tourism, as well as reducing commuter car use and thus speeding up freight and business traffic.

## Page 92

This page states that, “Successful town centres have an important role in the local economy as they attract businesses, investors and residents for a wide range of business, community and cultural events. People are drawn to lively, well-patronised town centres where they can shop, relax and socialise in a safe, clean environment. Town centres also serve as neighbourhood hubs with distinctive characters and features that communities can be proud of, and streets have an important function as public open spaces as well as catering for pedestrians and vehicles.”

The message from the mayor (vol 1 pg 8) talks about “respecting communities’ desires to retain their local identities and directions”.

The amendments to the Long-Term Plan on page 4 states that “Councils have an obligation under the Local Government Act (LGA) to recognise the diversity of local communities”.

We highlight the submission to the Annual Plan of Save Our St Heliers, which Civic Trust Auckland supports (CTA is a foundation member of this group), which in essence states this community group’s wish to retain the seaside village character of St Heliers.

As a result of the demolition of the five cottages in Turua St, St Heliers, locals have vowed to boycott any businesses that set up in the new development. The campaigners for saving the buildings felt their views were not listened to by either the developer or Council and that Council and the Environment Court were focused on the viewpoint of the developer. Even their request that some features of the Spanish Mission style houses be reflected in the new development was ignored.

One of the matters on which Save Our St Heliers has submitted on the Draft Annual Plan is that all resource consents within the St Heliers Village be publicly notified. This is the view of a number of groups with which the Trust is associated, such as the CBD Residents’ Advisory Group. Civic Trust Auckland has long held the view that all resource consents within the Auckland region be publicly notified to all the people who are affected.

CTA further advocates that for the purposes of notification, the determination of parties “affected” by an activity should include *all* those whose enjoyment of amenity is affected by the effect of that activity, not just the occupant or immediately adjacent neighbour. In the case of heritage amenity for example, this is a collective asset, and its loss is a cumulative effect that affects the broader public. (To illustrate the point, it is clearly wrong to suggest that the residents of Manukau would not be *affected* by the destruction of *every* heritage building in the central city just because they live 20kms away.)

RMA section 6(f) elevated “the protection of historic heritage from inappropriate subdivision, use, and development” to a matter of national importance that Council *must* recognise and provide for. Since there is much heritage of significant value as yet unidentified, Council should adopt a precautionary approach by considering the public potentially affected by any proposal with negative effects on any building which, although not scheduled, *does* prima facie have heritage value.

Another group of people which CTA has supported on their local issue were those advocating for the visual and open space amenity of Newmarket Park. Local people reported that they were not consulted about the remediation works Auckland City Council had planned for the park. They expressed their dismay, particularly at the felling of a large number of trees, some of which they had planted themselves. CTA enquired of Council who the affected parties in this case were considered to be. No satisfactory was received, but CTA would contend that those people whose properties overlooked Newmarket Park *should* reasonably be considered to have had their visual amenity potentially adversely affected to the extent of warranting notification.

Other communities have their own aspirations, whether or not expressed to date. (See our comments under part 3.)

CTA considers that the retention of the character of many of the “villages” relies on the retention, at least in part, of older buildings. These may require seismic upgrading and CTA consider that Council should develop an effective mechanism whereby the costs and benefits of undertaking such upgrade may be equitably shared between Public and building owners.

**Page 96**

This page states that “Auckland Council is involved in a wide range of planning and regulation activities to protect and enhance Auckland’s natural and built environment, protect public health and safety, and ensure that Auckland is an attractive and desirable city that copes well with pressures from development and growth”.

CTA’s viewpoint and that of many groups we are associated with is that there is a misfit between such aspirations and the outcomes and that there is an urgency to find out why this is and to address it. We are of the view that an audit of the decisions made by Council’s planning and heritage departments should be carried out. In particular there needs to be an audit done of Council’s scoring system for heritage buildings in terms of the outcomes realised by application of this methodology.

We advocate the promotion of sustainability and resilience in planning and building controls in order to manage the risks associated with major natural disasters and the loss of major energy sources

**Page 99**

This page states that, “The council closely monitors the state of the natural, physical and social environment, the impact of development and change within Auckland, and the performance of the controls within its statutory planning documents so that it can respond to issues in a proactive manner when required.”

CTA would like to know how this monitoring is done and the specifics of “the performance of the controls within its statutory planning documents”. In particular we are interested in the urban design and sustainable development strategies, policies and guidelines and how policies lead to “protection of Auckland’s natural and built environment and its valued heritage, and provision for its ongoing growth and development through the sustainable management of its resources”. We note that there does not seem to be any mention of heritage in the spatial plan for Auckland.

One of council’s key projects for the coming year is “improved consenting processes”. CTA is of the opinion that these need to ensure that due process *is* followed, and that *all* relevant information is in the first instance, provided by an applicant, and thereafter adequately recognized and provided for by Council.

Council needs to ensure that applications are complete, in accordance with RMA section 88 and consequently RMA Fourth Schedule, and that plan changes to schedule heritage in the District Plan are processed in a timely manner.

We note that one of the mayor’s 100 projects is to “Improve the resource and building consent process” by “making the resource and building consents process simpler and reduce processing times to improve customer satisfaction”. From the business point of view a reduction in processing time and a decrease in the cost of building consents would be appreciated. Safety and quality of design, however, should not be compromised.

From the community point of view we reiterate that all information needs to be before all affected parties, including a heritage assessment, where applicable. The “case management and pre-application meetings” should involve all parties community so that public interest groups are represented and their input can inform the process at the beginning, not near the end, as so often happens, resulting in, to say the least, unsatisfactory outcomes. We note (on page 104) that, “Local views are sought during strategy and planning development”. Our concern is regarding how much these local views inform development.

Council notes the importance of current and reliable information and knowledge to ensure that its plans and policies are informed. Whilst it is acknowledged that it will take some time, CTA

considers that Council should complete a comprehensive assessment of heritage amenity in the region, and in the interim, adopt a precautionary approach to protect unidentified heritage by developing appropriate rules affording Council discretion to protect it.

#### **Page 104**

Within its environmental protection services, noise is included as something to be monitored by Council. We would like to point to the complaints about street cleaning methods, particularly by residents of the CBD, as regards cleaning operations at night. We advocate that leaf blowers should be replaced by brooms. The method and timing of glass collections at night also needs addressing in terms of the issue of noise. Another issue of concern is the increase in the noise level in Aotea Square while major events are underway. Planning for the CBD needs to take into account that there are 25,000 – 30,000 residents now living in the CBD.

The benefits of regulating and monitoring are stated as including:

- Auckland's built environment is well-constructed and sustainable, with high-quality urban design
- Auckland is an attractive and desirable city that copes well with pressures from development and growth.

High quality urban design in Auckland seems to be a desire more than a reality, in particular with regard to new residential and commercial buildings. The Urban Design Panel membership needs to be considered in this regard, as well as its powers. Furthermore, the work of Council planners as regards contemporary developments in Auckland needs to be scrutinised. The performance of Council needs to be measured when it comes to resource consents, heritage protection and building a quality environment, particularly when developments are approved which are out of character with the areas for which they are proposed and their aesthetic value is low.

Some recent developments of public open spaces have been informed by good design, such as the shared space concept as in Darby St, which has made this part of the CBD more attractive and seems to function well. Comprehensive consultation with stakeholders, including the resident population of the CBD, did take place in this instance.

#### **Page 105**

This page states that in terms of measuring performance Council "Deliver[s] a resource consent processing and compliance monitoring service that meets statutory requirements and is responsive to the needs of the community". To respond to the needs of the community, as we have indicated, Council needs to ensure that all resource consents are publicly notified. This way issues can be discussed well before developers have spent money and well before plans have been made.

#### **Page 113**

A policy that would deliver emissions reductions from transport is to make it easier for people to use and enjoy public transport. (See our comments re pg 160 ff)

#### **Page 119**

"Auckland Council provides leadership to ensure Auckland's environment is appropriately maintained and preserved." Council is to be congratulated on its many environmental programmes. Leadership by the community and by individuals needs to be acknowledged as well. There is considerable expertise locally available.

Best practice programmes "from across the region" should be adopted, as well as the best practice from other parts of New Zealand and cities in other parts of the world. Auckland has had the benefit of many visiting experts such as those who have presented at the mayoral forums over the past several years. CTA is interested to know what projects or changes in policy have been implemented as a result.

**Page 131**

We support the “maintaining [of] of a regional cultural heritage database to provide information to landowners, resource consent applicants and other interest groups”. We would like to know what items would be included on the database, the timeframe of its publication and how it is to be accessed. We would like to register Civic Trust Auckland as an interest group that wishes to be kept informed about the database.

We note that to date, to schedule a heritage building in a District Plan is a lengthy and costly process.

The importance of Auckland’s unique cultural heritage to its environmental, social, economic and cultural well-being” being a given, there needs to be much more emphasis within Council planning and policy to safeguard vulnerable heritage items. Council needs to meet its responsibilities under the Resource Management Act to achieve the integrated and sustainable management of natural and physical resources.

The introduction on this page provides a wide array of aims. It would be helpful to re-draft these to reflect the hierarchy established by reference to sections 3, 5, 6 and 7 of the RMA

Council raises the need to maintain a regional cultural heritage database. CTA considers it essential that identification of resources providing heritage amenity should be identified in a manner consistent within Auckland, and furthermore, across New Zealand, ie: the discipline of identification should be able to be determined consistently across the country in accordance with the intent of RMA s.6(f)

CTA considers that Council should acknowledge that the Public is an interest group affected by activities that have effects upon their collective heritage amenity.

Council intends amending controls, processes and practices as a result of monitoring. CTA suggests an independent audit of Council’s process of heritage identification might be useful in determining what needs to be done

**Page 132**

In accordance with the purpose of the RMA, CTA would encourage Council to develop heritage programmes that *promote* sustainable management of Auckland’s heritage resource. This should include targeted incentives to encourage and facilitate positive and enhanced heritage outcomes.

**Page 133**

CTA considers the national importance of heritage, pursuant to RMA sec 6(f), is not adequately recognised and provided for with the proposed level of operational funding allocated to “Natural, cultural and built heritage protection”

**Page 143**

Water is essential for life. CTA advocates that there should be no charge for the supply of clean water or removal of waste water up to the average kilolitre usage of a family of with two children.

**Page 160**

CTA supports in principle the key transport projects outlined.

We would like to see the feasibility study for the airport rail link be given priority over a feasibility study of a third harbour crossing and that more consideration be given to water transport as a means of crossing the harbour. Water transport does not require extensive infrastructure and has other benefits for the environment.

In its submission on the Draft Auckland Regional Public Transport Plan CTA strongly supported integrated ticketing and its speedy introduction and we are pleased to see that it is one of the key projects.

We would like to know the details of “transport projects to ensure the success of Rugby World Cup 2011”, noting that the word “public” does not precede the word “transport”.

The walkway-cycleway on bridge should be included in the key projects for Auckland Transport. We note that the mayor has prioritised certain activities for Auckland Transport which includes to progress work on walking/cycling bridge under the Auckland Harbour Bridge.

Traffic signalling should be more responsive to pedestrians so that when a pedestrian pushes the button to cross the road the traffic controls respond promptly to stop the traffic to allow the pedestrian to cross. The pedestrian priority at crossings in the CBD should be extended across the region so that the pedestrian crossing phase always occurs immediately after traffic flow in each direction e.g. traffic north-south, pedestrians, traffic west-east, pedestrians, etc.

CTA regards cycling as an integral component of a more sustainable lifestyle.

Cycling and walking route mapping in conjunction with Maxx and considering greenways routes could be undertaken in order to:

- provide an integrated focus of expertise and energy in creating and managing the maps
- a single point of contact for the public in looking for alternative transport modes
- a convenient integrated resource for tourists looking to catch a ferry or bus to walkways and other points of interest
- provide a framework for people undertaking bush walks or cycle trips with a mobile device to plot their progress and also to dial up audio-visual material about points of interest, such as
  - Natural features - geographical, fauna or flora
  - Stories about places
  - Cafes, restaurants, museums, etc

CTA supports the submission on the Annual Plan by Living Streets Aotearoa and Walk Auckland, the aim of this group being to promote walking and all its benefits and to advocate for people with special mobility needs.

CTA particularly supports this submission’s points regarding:

- effective transport choices including accessible public transport and increased provision for cycleways, walkways and shared spaces.
- increased provision for walkways including at the waterfront, foreshores of Orakei Basin and Hobson Bay, Milford Reserve and on the Auckland Harbour Bridge.
- Auckland Transport’s walking initiatives
- Maintaining footpaths to a high standard and making them non-slip.

The mayor has prioritised certain activities for Auckland transport and we particularly support the following:

- airport rail link – progress initial planning, design and designations
- integrated ticketing – not only for the Rugby World Cup but region wide for its citizens
- progress work on walking/cycling bridge under the Auckland Harbour Bridge
- review of ferry services and present for enhancement.

CTA applauds the previous Council’s Transport Committee for the 21 October 2009 forum on shared use of Tamaki Drive. Such forums are an excellent opportunity for individuals, community groups and other stakeholders to provide input on issues that concern them, as



well as to hear and to understand the concerns of others. (We would like to see more forums on the various issues that affect Auckland City.) One of the major outcomes of this forum was the desire for improved education for all road users.

CTA advocates cycle paths separated from motorised traffic and celebrates the north-western cycleway and its recent improvements in the Kingsland area. More separate paths will encourage people to cycle who currently feel that on-road cycling is not safe enough.

We further submit on transport that:

- There is a need for more routes and higher frequencies for cross-city travel.
- Smaller buses could be gradually brought in to replace larger buses and to provide a more frequent service.
- A 24-hour public transport service would contribute greatly to [state some goal e.g. providing the public with more transport choices].
- There should be easy provision to both criticise and commend public transport operators and a method that would seem to be effective is placing a comment in a suggestion box on a bus/train/ferry.
- There should always be available on public transport a cash option for payment of fares for the following customers: tourists, those for whom English is not their first language, infrequent users and those who are unable to understand any form of ticketing other than an on-the-spot exchange of cash for a physical ticket.
- A major complaint about buses is the loudness of the noise they make, especially when pulling away from a stop.
- More hybrid electric buses would help to alleviate the noise problem.
- We would like to see the fitting of bike racks onto public buses.
- Parking for bicycles should be under cover to protect them from rain.
- The provision of free public showers would service cyclists who wish to commute but their place of work or study does not provide showers (at the same time as providing for the homeless members of our communities).
- Integration of green walking and cycling routes within local board areas should be developed
- We propose the adoption of one region-wide free public transport day per month as a means to promote public transport
- Public transport services need to be introduced to new urban areas before car habits become established.
- The Maxx telephone service should be available before the hours of 6.00am/6.30am and after 8.00pm/9.00pm to enable customers more opportunity to plan their trips.
- We support the establishment of a commuter line between Auckland and Hamilton.
- We would like to see expansion of the ferry services.
- We favour the development of park and ride facilities beside the ferry wharves.
- We would like to see provision on Queens Wharf for additional bus terminals with convenient access to Britomart rail terminal and the ferry wharves.
- We submit that consideration be given to further options within the public transport network, as well as alternative funding, in particular regarding:
  - Trams
  - Rapid rail
  - An overhead RTN.
- The Auckland region can learn from and adopt transport strategies and practices that have been used successfully elsewhere.

CTA also supports Cycle Action Auckland's submission, including the following points:

- Auckland Council appoint a "Cycling Champion"
- There be greater level of investment to boost cycling growth
- The Regional Cycling Network be listed as a key transport project
- 'Blackspots' on main cycling routes, like Tamaki Drive be fixed urgently.

- Council to continue to engage with NZTA on the Central Motorway Junction Cycleway to provide for local cycling connections on Council land and complete the continuity of these strategic cycle routes
- New Lynn Transport Centre / Transport Oriented Development to provide safer cycle access to the transport hub and provide more off-road cycle paths in the TOD area.
- The public bike hire service should be restored before the RWC.

### **Vol - Part 3**

CTA has already engaged with the Local Board for Waitemata. We see each area's local board as an essential way for individuals and community groups to have their voice heard on local issues.

Local boards need to engage with their communities to find out what these are. Ideally they would give notice of the desire to consult via a number of different media and would offer several different ways of carrying out the consultation. The Waitemata Local Board's recent launch used several workable ways of consulting: participants could speak face to face with board members, they could write their comments on post-it notes to place at various themed stations around the venue, they were made welcome to contact board members afterwards and they were invited to an evening public meeting.

Local boards could show support for community-led development initiatives such as outlined in [www.flaxroots.org.nz](http://www.flaxroots.org.nz) to ensure that Council and local boards encourage community engagement in planning and implementation.

We emphasise strongly that local communities wish to be involved in *genuine* consultation on proposals that will affect them.

CTA supports the submission of the Auckland Community Development Alliance and agrees that the Auckland Community Development Charter as an effective framework for progress that harnesses the power, skills and goodwill of all our communities and sectors. Having all of Council (including Local Boards and CCOs) formally adopt the Charter would ensure decision making is underpinned by effective community development principles and guidelines and therefore relevant and useful across all of Auckland's communities.

### **Vol - Part 4**

#### **Page 221**

A public waterfront "for all Aucklanders and visitors to Auckland" needs to include public input, such as regards the Wynyard Quarter and Queen's Wharf and other port areas. For example the \$8 million spent on the "Cloud" could have been better spent upgrading the existing shed, even if only for temporary use, achieved in Sydney (amongst other places) with great results. This would have fitted within the objective of retaining Auckland's heritage, as "a place where we can express our cultural heritage and history".

Communities will feel more engaged and a sense of belonging if their input to proposed projects is realised.

#### **Page 225**

Experiences for visitors contain an element of disappointment while our built environment is unattractive. CTA looks forward to further improvements as regards Auckland urban design, based on ideas offered by the overseas experts with whom Council has been in discussion, including the ideas presented to Council from recent overseas experts such as: Daniel Moylan, Jan McCredie, Jonathan Smale, Egle Garrick and Larry Beasley, as well as our own urban design champion, Ludo Campbell-Reid.\*

#### **Do you support the following proposed policy changes?**

Rates remission and postponement:

Yes

Discount for early payment of rates:

Yes

Maori freehold land remission:

Yes

Airport shares:

Yes

CCO accountability:

Yes

Significance:

Yes

Treasury management:

Don't know

**Comments on these proposed policy changes:**

The significance policy is not clearly stated and needs further consultation. In terms of the numbers of residents and ratepayers affected and the degree to which they are affected, we would like to know how this would be determined - refer to our comments above as regards affected parties - and what consultation with the residents and ratepayers would be undertaken. We have seen past councils make their own determination on whether there is wide public interest or not on various issues; this is not democratic.

We note the list of Council's strategic assets.

We wish to speak in support of our submission at a public hearing.

Date of submission: 1 April 2011

Signature:



Secretary, Civic Trust Auckland