



Submission of Civic Trust Auckland

Auckland Council Draft Annual Plan 2014/2015

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

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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.

1. Stadium strategy

Do you support the proposed strategy regarding Auckland's four major stadiums?
Why?

Support Do not support Unsure

Comments:

We acknowledge that the major stakeholders largely agree with the proposals of Regional Facilities Auckland and they support integrating the operations of the four main stadiums. It seems sensible that each stadium becomes specialised in particular sports and we support the benefits of avoiding duplication and saving costs.

We presume that as it is proposed the stadiums become specialised in a sport that is played either in winter (e.g. North Harbour Stadium becomes the venue where smaller rugby, league and soccer games are played) or summer (e.g. Western Springs becomes the main Auckland venue for cricket matches), that the stadiums will still be fully utilised in their off-seasons. We presume that they will in their off-season time and at other times when not conflicting with scheduled games be used for purposes other than games, as has been the practice until now, e.g. concerts, visits by crowd drawers such as the British Royal Family and the Dalia Lama (Eden Park) and fundraising events such as the Auckland Cancer Society's Relay for Life (Mount Smart Stadium).

With Mount Smart proposed to become the main venue for speedway events, it is hoped that all residents who live within earshot of the stadium have been letterboxed for their views on this matter.

We strongly support existing community uses of these stadiums. Although local businesses may benefit from the proximity of the stadiums, the residential part of the neighbourhood is sometimes disadvantaged and should therefore be compensated by being able to maximise their use of these facilities.

As regards “reallocating current funding to support better use of the facilities in order to remain at, or near to, current levels of funding” we support better use of the facilities, and, as the plan states, as this is intended to save costs, this would enable funding to be allocated in Councils’ budget to activities other than sport spectating that contribute to a liveable city.

2. Auckland Arts Festival

Do you support making the Auckland Arts Festival an annual event? Why?

Support Do not support Unsure

Comments:

An additional \$1 million to enable the Auckland Arts Festival to be held annually is not much spend in comparison with other elements of Council’s budget. As stated in the draft plan, *“The Auckland Arts Festival supports the objectives of the Auckland Plan by integrating arts and culture into the everyday lives of Aucklanders and by fostering and encouraging the development of Auckland’s creative sector. The Auckland Arts Festival adds life and activity to Auckland’s city centre, which supports both the Auckland Plan and the Economic Development Strategy’s aspirations for a creative, liveable city.”*

However, we would not support an annual Auckland Arts Festival if it were to be held within a similar time period as the Wellington International Arts Festival, as this could dilute the content of each due to competition for performers, and split the audience between the two centres. Currently the two festivals are held on alternate years to each other and this would seem to work well.

3. Your community

Which local board does your submission relate to?

All

CTA supports the advocacy of local environment and heritage protection activities by all the Local Boards, including the following, many of which could be adopted by other Local Boards according to their own circumstances:

Albert-Eden:

- *Completion of heritage assessments in the Albert-Eden Local Board area, specifically in the Mt Albert, Greenwoods Cnr, Balmoral North and Pt Chevalier areas*
- *Improvement in levels of civic engagement which will lead to an increase in the number of Aucklanders engaged with local government*

Orākei

- *Undertake residential heritage assessments of post-1944 buildings in the Orākei Local Board area where appropriate (e.g. Clonbern Road, Remuera)*
- *Advocate to the governing body for additional funding to carry out heritage assessments of pre and post-1944 built areas within the Orākei Local Board area for inclusion in the Auckland Unitary Plan*
- *Advocate to the governing body for the Stonefields Heritage Trail to be included in appropriate governing body plans*

Papatoetoe-Ōtara

- *Heritage trail*

Puketāpapa Local Board

- *Heritage survey*

Upper Harbour Local Board

- *Feasibility study on the restoration and improvement of Herald Island's Christmas Beach.*

Waitakere Ranges Local Board

- *Implementing the recommendations of the first monitoring report required under the Waitākere Ranges Heritage Area Act.*

Waitematā

- *Prioritise and produce a heritage assessment for Grey Lynn and Westmere*
- *Ensure the restoration and protection of Carlie [sic] House*
- *Complete an Aotea Quarter Plan, including allowing for the future use of the current car park between Myers Park underpass and Q Theatre as public open space; and fund the redesign and redevelopment of the underpass from Myers Park to Q Theatre to connect Myers Park to Aotea Square*
- *Ensure the restoration and protection of the St James Theatre working in collaboration with the Save St James Theatre Trust*
- *Re-prioritise the Transport budget to active (walking and cycling) transport and improve:*
 - *cycle infrastructure*
 - *traffic calming*
 - *pedestrian safety and amenity*
- *Skypath*
- *Fund and deliver the on-road components of the Waitematā Local Board greenways project prioritised for 2014/2015.*
- *The introduction of low impact storm water solutions in the Local Board area*
- *The delivery of green walls, roofs and community gardens on Auckland Transport assets*

Before proceeding with the Myers Park Development Plan there would be genuine merit in reviewing it in the context of its formation and its existence as an historic park, e.g. account should be taken of historic elements.

As regards the development and implementation of the Ponsonby Road Masterplan, we have not seen the final version of this plan so cannot offer our support. We supported some aspects of the draft masterplan but are of the view that it was incomplete, particularly as regards provisions for the built heritage on Ponsonby Road (one of the earliest colonial streets of Auckland) and that the top priority should be to protect and enhance the historic and cultural heritage of Ponsonby Road, with

the first action being to complete a heritage and character assessment of the area, and, as a result, to put protections in place for the built environment.

4. Other comments

Do you have any other comments on the draft Annual Plan 2014/2015?

(a) St James Theatre

We note that within the activities in the regional events facilities group which contribute to *“providing high-quality performing arts, cultural, heritage, leisure, entertainment, sporting and conference facilities that reinforce Auckland’s national and international reputation as an exciting events destination”* and *“add vibrancy by giving Aucklanders and visitors the opportunity to attend events at world class venues”* the following activities which are delivered include: *The Edge event facilities management: managing and developing* The Civic Theatre, Auckland Town Hall, Aotea Square and Aotea Centre. CTA advocates for the St James Theatre to be included in The Edge group of facilities, at least, to become a working theatre again. We note that the Waitemata Local Board’s Plan includes *“Ensure the restoration and protection of the St James Theatre working in collaboration with the Save St James Theatre Trust”*. We support this and encourage Auckland Council to allocate sufficient funding towards it, e.g. some of the money saved by integrating the sports stadiums, which would demonstrate that Council is *“protecting further historic heritage places and enabling communities to be better placed to appreciate Auckland’s heritage”*. (vol 1, pg 47)

(b) Seismic upgrades to heritage buildings

We observe that the only reference to any budget allocated towards the earthquake-prone building policy is in the following activity (pg 52)

Building consents - implementation of the earthquake-prone building policy.

If funding were allocated towards assisting owners of heritage buildings with seismic strengthening requirements, this would serve to support Council’s statement (vol 1, pg 47) that it is, *“Identifying and protecting further historic heritage places and enabling communities to be better placed to appreciate Auckland’s heritage”*. If owners are not relieved of some of the enormous financial burden of seismic upgrades, they will not be in a position to continue their contribution to the stewardship of Auckland’s historic heritage amenity. Council should not be unduly concerned at the notion of such public investment in private property. Since heritage amenity is a public good, Council could take steps to protect its investment in such amenity by the negotiation of covenants over properties in which such public investment may be made.

(c) Auckland Plan outcomes

We support the statements on page 84 that, *“Lifestyle and culture activities contribute to the outcomes of the Auckland Plan by ... recognising and promoting the contribution of our natural heritage to urban character, quality, amenity and sense of place. Protecting, enhancing and increasing Auckland’s parks and reserves helps tackle climate change and increases energy resilience”*.

We suggest the addition of the underlined words so that this reads, *“Lifestyle and culture activities contribute to the outcomes of the Auckland Plan by ... recognising and promoting the contribution of our natural and built heritage to urban character, quality, amenity and sense of place”*.

(d) Regional Parks Services

We support the following group of activities:

Regional parks services

The activities in this group contribute to high quality local and regional parks, gardens and our volcanic cones, which safeguard our natural environment while meeting our recreation and lifestyle needs and those of our visitors.

The following activities are delivered:

- Botanic Gardens - maintaining the Auckland Botanic Gardens, including creating opportunities for outdoor recreation, accommodation and events.*
- Parks policy and acquisition - providing policy assistance around parks, street environments and related maintenance services, and advising on acquisition of new local and regional parks.*
- Regional parks - managing and maintaining regional parks including ensuring natural environments are protected and enhanced.*
- Farms - contributing to heritage, conservation and education, and promotion of environmentally sustainable farming practices.*

To ensure that natural environments are protected and enhanced there needs to be adequate funding for conservation parks across the Auckland region. There also needs to be adequate funding and support for volunteer groups and these groups need to be consulted about decisions affecting them, especially the “operations plan” within the Maunga Authority. Such funding should be explicit in the Annual Plan within volcanic cones and regional parks as well as in each Local Board plan. Funding for ecological restoration by volunteers should be included in long-term budgets in order to integrate animal and plant pest control, planting and species survival and ensure ongoing maintenance.

Funding also needs to address the differences between use of the maunga and conservation works, the preservation of archaeological features and SEA issues and ensure that there is no waste of money.

We submit that until the Interim Operational Plan for 2014/2015 is established between the Maunga Authority and Auckland Council that the work of volunteer groups on the various maunga continues as it has done until now, in particular the current weeding and ecological conservation programmes.

The Interim Operational Plan has the following list of key areas of focus:

- Visitor experience – Recreation use, development and events
- Maintenance and infrastructure
- Conservation and heritage
- Community engagement and education
- Policy and planning.

We submit that the other four areas of focus should take priority over “Visitor experience”. The maunga are primarily historic reserves and recreation is a secondary use.

(e) Local Arts, Culture and Events Services

We submit that Movies in Parks be re-classified as a local event and come under Local Boards, so that local areas can be served better with these events and at less cost.

We submit that the Bungalow Festival be encompassed within the events in the Auckland Heritage Festival and be allocated a budget of no more than \$15,000.

(f) Key priorities

We support the following key priorities:

- *Acquiring open spaces across the region*
- *Working to protect and enhance Auckland's natural environment and ecology through parks, and preserving and protecting our volcanic landscape and the Hauraki Gulf islands.*
- *Providing improvements and enhancements to visitor facilities and services across regional parks and Auckland Botanic Gardens and volcanic cones.*

Under "Progressing area plans programme" (pg 32), Devonport / Takapuna and Otara /Papatoetoe are scheduled for completing in 2014. This ignores the obvious fact that the Waitematā Local Board Area Plan should be number 1 priority because this is the ward where Auckland was first settled, where the former Auckland City Council failed to adequately identify heritage and where some of the highest levels of intensification are proposed and thus where the greatest threat to heritage exists.

(g) Key projects

We support the following key projects:

- *Continue working with communities to improve the health of five streams in Waitākere through Project Twin Streams*
- *Continuing to work closely with Iwi and a range of agencies to improve the water quality and sustainable management of the Manukau Harbour.*
- *On-going ecological restoration projects.*
- *Working closely with heritage groups to document, celebrate and preserve Auckland's cultural heritage.*

The Freyberg Square upgrade needs to be integrated with the upgrade of the Pioneer and Women's Ellen Melville Hall in a comprehensive manner which takes account, as yet not done, of the heritage values of the Ellen Melville Hall, itself proposed for upgrading.

(h) Māori outcomes

We support the Māori outcomes programmes, particularly *"strengthening Auckland Council's relationships with Māori through relationship agreements, coordinating council's contribution to papakāinga and marae development and Māori economic development and enabling mana whenua in their role as kaitiaki (guardians) in a range of activities including resource management, heritage and parks management"*.

We support the key initiative of *"identifying, assessing and managing heritage properties and sites of special significance to Māori"*.

We suggest that Auckland Council engage more closely with NZHPT to capitalise on the considerable amount of knowledge held and opportunities identified by the Trust.

(i) Built and natural environment

We support Council's aims as follows (vol 1 pg 47):

"Through its built and natural environment activities, the council aims to protect and enhance Auckland's natural environment through monitoring our air, land and water quality, promoting urban design, conserving our historic places and regulating a number of associated activities."

We support Auckland Councils' commitment (vol 1 pg 47) *"to minimising adverse effects of development on the environment in delivering a green and beautiful Auckland that is loved by its people"*.

(i) Heritage protection

The Draft Annual Plan (vol. 1 pg 18) invites views on amendments to the LTP 2012 - 2022. Changes to the LTP need to be considered which would provide new ways of funding contributions by the public for the retention of historic heritage (an RMA section 6 matter which Council shall *“recognise and provide for as a matter of national importance”*). The need for such mechanisms is critical at this stage of Auckland’s development, given the current threat to heritage posed by the convergence of proposed intensification, the looming cost of earthquake strengthening and the failure of legacy Councils to adequately identify heritage.

We support the following activity (pg 48):

“Cultural and built heritage protection - managing, protecting and conserving Auckland’s historic heritage through research, providing expert advice, supporting heritage policies and projects, incentivising best practice, community involvement, and on-going conservation programmes at regional parks.”

Retention and restoration of historic heritage and historic character brings economic benefits to a city in terms of: jobs and income, heritage tourism, property values, sustainability, city centre and town centre revitalisation and fiscal responsibility.

We note that Council states (vol 1, pg 47) it is:

“Identifying and protecting further historic heritage places and enabling communities to be better placed to appreciate Auckland’s heritage”. We advocate for the identifying and protecting of further historic heritage places to be accelerated and submit that Council commits more of its budget to this process. Much of our heritage remains unidentified and unprotected, despite past Councils stating this as one of their priorities and it being a requirement of the RMA. Heritage losses continue. We conclude that Council’s heritage department is underfunded and under-resourced, as it is failing to meet this requirement.

We value the existence of the Built Heritage Protection Fund but consider that its \$8.7 million to buy properties that have significant heritage value or features will only enable Council to deal with a tiny number of properties, and the quantum is too small and is most unlikely to address the scale of the threat facing heritage.

In the group of activities: Local built and natural environment (pg 51) which *“contribute to ensuring our local natural and built environments are protected and preserved for generations to come,”* we can recognise that this is achieved *“through wetland and habitat restoration, species management [and] native planting”* and support this allocation of funds. However, we would like to see more evidence of *“support for the appropriate use and re-use of heritage sites and items, funding to help maintain a scheduled heritage site and providing free public information on heritage and related issues”*. Two of the scheduled heritage sites that we would particularly like to see benefit from funding to help ensure their protection are Carlile House in Grey Lynn and the St James Theatre. (photos on next page).



Carlile House (above) St James Theatre (below)



The need for Auckland to retain elements of its historic heritage for future generations will be exacerbated as Auckland's intensification progresses and increasing pressure is placed on the city's heritage resources. The need to protect historic heritage is underpinned by the s.5 purpose of the RMA, and to give effect to this, consideration should be given to greater use of targeted rates. Such a targeted rate might, for example, be levied on some or all segments of Auckland's rating base and used to fund interest payments on Council borrowing, which could fund the purchase, protection and resale of qualifying heritage assets. Such an approach could extend the reach of the built heritage incentive fund.

Given Council's dilution of the word "character" beneath the threshold for recognition as historic heritage, there are few performance measures to judge Council's effectiveness in protecting those character elements. This is of great concern in relation to the character of Auckland's historic city fringe centres and some of its town and local centres, where under the Unitary Plan these centres would not constitute heritage, in spite of the belief by Aucklanders that such *is* the case.

It is important that resources be directed towards the recognition of broader areas of heritage significance, given the magnitude of places currently requiring assessment for Unitary Plan protection. Notwithstanding the inadequate budgets allocated to heritage identification in spite of it being a matter of national importance, what is required is a more overarching recognition of the value of some heritage areas.

Waivers of the land and property information fees (pp 224- 225, vol 1) would give effect to Council's commitment on page 51 to provide "free public information on heritage and related issues". In order to make this manageable this might be limited to recognised heritage groups. We note that the references to "land and property information" on page 52 note that such information "enable[s] people to make informed decisions about the land and property they purchase". This excludes people who are trying to protect heritage

(k) Incentives

We congratulate Council on its intention (pg 48) as follows: "*The council will also be developing a policy to incentivise the protection and restoration of natural and historic heritage*".

Such financial incentives would in turn require changes to, for example, Council's development contributions policies in the Long-Term Plan.

We suggest that these incentives could include:

- Historic heritage areas
- Waivers of zone provisions
- Specified permitted uses
- Plot ratios or site intensity zonings
- Transferable Development Rights
- Contributions (development and financial)
- Private-public partnerships
- Heritage grants and loans, e.g. for repairs
- Rates relief
- Interest-free loans
- Public purchase and revolving acquisitions and funds
- Consent fee waivers and discounts
- Heritage floor space bonuses
- Earthquake assistance, e.g. technical advice.

We note that Dunedin City Council offers the following incentives:

(Refer: Policy Planner (Heritage) 03 477 4000 heritage@dcc.govt.nz)

- A heritage fund with two funding rounds per year, in March and September. Emergency applications may be made at any time.
- The Central City Heritage Re-use Grants Scheme: a contestable fund available to owners of pre-1940 buildings in Princes Street and adjoining areas. Grants are to assist with a range of activities related to improving the use and physical appearance of heritage buildings, that also protect heritage values in the area. Grants may be given for:
 - Earthquake strengthening and other upgrade requirements
 - Façade improvements such as painting, restoration and up-lighting
 - Initiatives which would lead to the re-use of buildings, for example
 - Support to start-up or expanding businesses (e.g. fit-outs, digital infrastructure etc)
 - Support to creative sector activities wanting to move into or maintain their activities in the area (e.g. fire rating or sound proofing studios)

- **Rates Relief:** in recognition of the value that restoration and re-use of heritage buildings offers the city, owners of heritage buildings undertaking major restorative works may be eligible for rates relief. Heritage rates relief aims to reward imaginative and/or productive re-use of heritage or townscape buildings. Rates relief is allocated from a contestable fund.
- A Targeted Rate Scheme for Earthquake Strengthening of Heritage Buildings which allows building owners to obtain funding for earthquake strengthening of heritage buildings and pay this funding back through a targeted rate on their property.

(l) Spatial, strategic and infrastructure planning

We note that \$7.675 million is allocated to spatial, strategic and infrastructure planning (vol 1, pg 33). Provision needs to be made for Council to “*identify nationally and regionally significant areas of historic heritage value*” as per Auckland’s Spatial Plan. This is a legislative requirement of the Local Government (Auckland Council) Act 2009, section 79(4)(e)(iv), which Council has to date failed to comply with.

(m) Heritage tourism (vol 1 pg 43)

We propose that Council develop a better understanding of Auckland’s tourism offering by investigating economic data to provide a better understanding of the economic value of heritage tourism. Such an understanding would likely reveal that, as is the case in most other world class cities, heritage tourists are some of the biggest spenders. The chart on “Built and natural environment theme” which states that environmental protection does not contribute to Auckland’s prosperity, provides evidence of Council’s inability to grasp this internationally well understood concept. What is unique to any country is the identity created by the built environment. Council’s previous document, outlining its “Economic Development Strategy” has not investigated the economic value of tourism and any work done by Council should be integrated into this document and inform that work stream as well.

Date of submission: 24 February 2014

Signature:



Audrey van der...

Secretary, Civic Trust Auckland