



## Feedback of Civic Trust Auckland

### Ponsonby Road Draft Masterplan

16 September 2013

Name: Audrey van Ryn (Secretary)

Organisation: Civic Trust Auckland

Phone (daytime): 368 1516

Phone (evening): 368 1516

Email: [cta@civictrustauckland.org.nz](mailto:cta@civictrustauckland.org.nz)

Postal address: PO Box 74 049 Greenlane

Civic Trust Auckland (CTA) 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.

Civic Trust Auckland has made numerous submissions to Council on heritage, the environment and transport (amongst other matters) over its 45-year history. Some of our members live and work or have lived and worked in the Ponsonby / Herne Bay / Karangahape Road areas. We understand that the Trust was involved in the writing of the Ponsonby Centre Plan (see appendix). We note that the Trust was not presented with the opportunity to be part of the working group for the 2013 Ponsonby Road Draft Masterplan.

The following points with regard to Ponsonby Road were included in our feedback on the Draft Auckland Unitary Plan:

*“Some of the areas that CTA consider are at particular risk are ... local commercial strips and villages along transport routes (former tram routes) e.g. Dominion Rd, Ponsonby Rd and Kingsland. These repositories of one and two storey Victorian and Edwardian development are under threat as the newly proposed densities are mostly for 3-4 stories, depending on the heritage overlays. The UP zoning for these areas, along with the proposed seismic upgrade rules constitutes a threat to this heritage.” (pg 6)*

*“There are circumstances in which historic character areas have historic character value, for example, in the Ponsonby historic character areas the area had significance as an early residential suburb and remnants of these key characteristics still remain.” (pg 14)*

*“As a general comment, the small buildings along transport corridors such as Dominion Rd, Ponsonby Rd and parts of Mt Eden Rd should be considered as the infrastructure of*

*small business which make up a large part of the Auckland economy in the face of Building Act requirements to upgrade these premises.” (pg 28)*

We read on page 6 of the draft masterplan that all feedback “will be analysed and used to inform the final version of the Masterplan” and we would welcome the opportunity for further engagement to discuss our feedback.

We note the following from the Waitematā Local Board Achievements Report 1 July 2012 - 30 June 2013, *“The Board attaches huge importance to engagement with the local community. While the Waitemata Local Board plan helped set the platform for the board, ongoing engagement with the community remains a crucial part of the board’s general approach to good local government.”*

We have read the list of working group members and although we see representation across a variety of groups we feel that this could have been more extensive, particularly with additional heritage input.

We recognise that there are various ways to achieve the outcomes of the draft masterplan.

We submit that Ponsonby Road needs to be read as a whole, not as different sections, and that it is vital that connections with the wider area need to be considered, particularly with K’ Road and Jervois Road. Ultimately Ponsonby & Herne Bay will be affected by a third harbour crossing, as St Mary’s Bay certainly is.

We note that Ponsonby has not been identified as an area or a place. We are unsure as to whether the Waitemata Local Board’s stated intentions to identify heritage (as per its Local Board Plan) will encompass a description of the area, in addition to the identification of individual heritage items, as has been carried out in extant planning documents.

CTA’s feedback as follows quotes from the Draft Ponsonby Road Masterplan in black with our feedback comments in [blue](#).

The 30-year vision for Ponsonby Road is:

“To develop Ponsonby Road as a vibrant, well connected place for people whilst protecting, enhancing and celebrating its unique heritage reinforcing its role as a key entertainment and boutique shopping destination and improving the natural environment”.

The six key outcomes are:

1. reinforce the role of Ponsonby as a key entertainment and boutique-shopping destination, whilst providing for a variety of housing types and a wide range of employment opportunities
2. protect, enhance, celebrate and interpret the historic and cultural heritage of Ponsonby Road
3. develop Ponsonby Road as a vibrant street that balances the needs of users
4. make Ponsonby Road safer for pedestrians and cyclists along its length
5. ensure sufficient provision of open space and community facilities to meet the needs of the Ponsonby Community both now and in the future
6. contribute to the achievement of region-wide improvements to the natural environment.

CTA supports the 30-year vision and the six key outcomes and considers that the draft masterplan contains some good ideas for the area. However, we are of the view that the masterplan is incomplete and that the ideas presented are simply a selection of possibilities. We do not consider it is “a comprehensive blueprint”, particularly as regards provisions for the built heritage on Ponsonby Road. This is one of the earliest colonial streets of Auckland, the character of its built environment probably being the main reason that Ponsonby is a key entertainment and boutique shopping destination.

We submit that the top priority should be “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.

This would align with the Waitemātā Local Board Plan. The Board’s priorities are listed on page 10 of the Local Board Plan and the first of these is “A distinctive, high-quality built environment that embraces its heritage”.

The Local Board Plan states (on page 10) that the Local Board “will focus on a number of priority areas over the next three years to deliver tangible improvements for our communities”.

Under the heading “Protecting our Heritage and Character” on page 13 the Local Board Plan states:

*“We will value and protect character areas and preserve heritage residential housing and local commercial buildings within Waitemata. We will work to make respecting and valuing heritage part of our everyday lives. This includes protecting against unfortunate cases of “demolition by neglect”. The council is developing a heritage plan for the entire region, and Waitemata Local Board will ensure a specific plan for Waitemata is created in which heritage is assessed, valued and protected. We will ensure the protection of the heritage and unique characters of our urban villages. We will complete the identification of city centre buildings and structures with significant heritage qualities and special*

*character including mid- 20th century commercial buildings. We will also develop a range of incentives and controls to protect buildings and mitigate potential economic effects for property owners. We will proactively identify and support the preservation of important heritage buildings ....*

*We are taking a strong position on protecting heritage and will advocate for this to be reflected in the Unitary Plan. We will also be involved in and supportive of the Urban Design Advisory Panel and Heritage Advisory Panel which provide input into urban design and heritage decisions for the region.”*

*Advice from the Heritage Advisory Panel, dated 23 March 2012 says, “The city faces many challenges and the Board is working to make sure the right balance is struck between the protection of heritage and character, and the intensification of the area. Local Boards potentially have a significant role in the identification, assessment and management of heritage but that needs to be reflected in commensurate levels of funding... The budgets of some Local Boards are minimal for heritage (e.g. the Waitemata Local Board at \$75,000).”*

Auckland Council needs to expand its approach to TDRs so that they can be a more widely used and worthwhile tool in creating better heritage outcomes.

We suggest that the first outcome listed in the draft masterplan would be more usefully divided into three, namely:

- (a) reinforce the role of Ponsonby as a key entertainment and boutique-shopping destination
- (b) provide for a variety of housing types
- (c) provide for a wide range of employment opportunities

However, providing for a variety of housing types in a key entertainment and boutique-shopping street of approximately two kilometres in length is perhaps too ambitious, as is the outcome to provide for “a wide range of employment opportunities”.

### **What does the Auckland Plan mean for Ponsonby Road?**

The Auckland Plan Development Strategy shows Ponsonby Road and its surrounds largely as a least change area with some pockets of significant change along Ponsonby Road and a larger area of significant change at the Great North Road end of Ponsonby Road.

The Auckland Plan identifies Ponsonby as a Town Centre within Auckland’s network of metropolitan, town, local and neighbourhood centres. As an identified Town Centre, it is envisaged that Ponsonby will in the future:

- continue to act as a local hub for the community providing a wide range of retail and business services and facilities, and community facilities
- continue to be multi-modal efficient
- provide for a range of residential living options, including mixed-use and higher-density options, while retaining its historic character.\*8

It has been recognised that Ponsonby is an existing local hub / town centre that works well. To retain the historic character of this area, assessments and protections, as we have outlined above, need to be prioritised.

## LAND USE

Outcome 1.1 calls for the Town Centre zone with the Key Retail Overlay to be applied to the present Residential 1 / proposed Single House zone from Franklin Rd to Pember Reeves St. However, as shown on the map, and as per the Draft Unitary Plan, this proposed zone runs from Russell Street to Franklin Road.

This section of Ponsonby Road encompasses a number of grand heritage villas, now mostly commercial, representing the residential history of the ridge. This distinctive section of Ponsonby Road, identified in the Heritage Study which Council already has, needs protection.

The section between Russell St and Franklin Rd is the only section of residential architecture left on Ponsonby Road. If this zone change goes ahead, only 11 residential buildings from Pember Reeves St to Russell St might remain. These are also, in general, inferior in quality and built form to those residential buildings between Pember Reeves St and Franklin Rd, which could disappear with a zone change.

The draft masterplan should include actions that support the retention of existing character and heritage buildings, whatever their current or future use.

More than three quarters of the building stock on Ponsonby Road is commercial. This remnant of residential built form should be protected and retained in its present form. We submit that the current Character Overlay (Residential) should remain. It is this level of fine-grained differentiation that is revealed by the heritage study. Dividing Ponsonby Road into Three Lamps to Franklin, and Franklin to K' Road does not allow such analysis.

The draft masterplan proposes a Business Historic Character Overlay for Ponsonby Road and "new developments subject in this zone will require resource consent to ensure that the design is of a high standard and enhances the quality of the centre's streets and public realm".

CTA is of the view that Council should consider various scenarios for absorbing the required intensification. As the scenarios below show, such analysis would allow Council to achieve its intensification objectives so that the building fabric of heritage significance, once assessed, can be appropriately be retained and incorporated



The status quo



4 storey, 60% take-up



4 storey, 20% take-up



4 storey, 60% take-up, 7 metre setback

We note that the development at 221 Ponsonby Road has been critiqued by the community, the NZHPT and the Local Board and does not meet expectations of quality. The decision by independent commissioners to approve this consent in spite of the Local Board's position should be taken into account in further consideration of Council's interest in the Nosh site at 254 Ponsonby Road.

Key retail streets are the focal points of pedestrian activity within the centre and developments fronting these streets are expected to reinforce this function. Sites that are covered by this overlay will be subject to a new suite of rules that restrict residential use at street level, require buildings to adjoin the street for the entire length of the site, and require minimum glazing heights.

If new developments are to define the street edge by adjoining the street, this counters the aims stated in the draft masterplan of more open space, improving the natural

environment and retaining the character of the area and would seem to directly counter key outcomes stated for Arts, Culture and Heritage.

Furthermore, if one of the aims is to “provide for opportunities for people to live, work and play in the area”, then prohibiting residential use at ground level works counter to two of these. In many cities it is the activation at ground level provided by residential use that provides overnight surveillance and vibrancy, as well as character, such as by means of front gardens with trees and flowers, as is the case with the majority of the residences in the streets that lead off Ponsonby Road.

We further note that passive surveillance of the street from shops or offices is not possible during night-time hours.

CTA supports consideration of measures to create a safer environment for pedestrians and cyclists along the length of Ponsonby Road. We support enabling two-way cycling on one-way streets.

## **ARTS, CULTURE AND HERITAGE**

### **Protect, enhance, celebrate and interpret the historic and cultural heritage of Ponsonby Road**

In principle CTA supports outcome 2 and most of the projects listed. However, as an initial priority, we would like to see more emphasis on the “protect” part of this outcome and therefore additional and prioritised actions around heritage identification, assessment and protection.

We note that “Auckland Unleashed” states, *“We propose to have no further loss of heritage by knowing what it is, where it is, and by having a range of tools and methods to protect it.”*

We note the NZHPT submission to the Waitemata Local Board Plan states as follows:

*“In particular the NZHPT considers that Local Boards can and should have a critical role to play in the comprehensive assessment of historic heritage within the Boards’ boundaries, so that this information can help inform plans and policies currently under development by Auckland Council. As all of Auckland’s legacy planning documents are combined into one Unitary Plan, it will be helpful for each Local Board to have a detailed knowledge of which heritage items warrant identification and protection to ensure that the diversity, representativeness and extent of historic heritage within their areas can be identified and protected.*

*As the Local Board area contains many of the earlier settled parts of Auckland there is a particularly high richness and diversity of heritage in this area. At the same time, the central location of the Waitemata Local Board area means there are development pressures ... ”*

We further note from the NZHPT’s Submission on “Auckland Unleashed” (pg 4) under the heading “Heritage or character?”:

“... many parts of Auckland typically considered as being of “character value” are also - in the NZHPT’s opinion - likely to have heritage significance, as per the RMA’s definition of historic heritage.”

Finally, from the NZHPT, in “Managing Heritage Beyond Individual Items”, the HPT commented on page 7 that,

*“Traditionally many of the older parts of Auckland have been primarily considered ‘character areas’, with only very small sub-sections of those areas identified for their specific heritage value (as “Conservation Areas” in the Auckland City Isthmus Plan, for example). The NZHPT considers that the heritage value of these areas may require greater consideration - as Auckland’s inner-suburbs contain one of the largest collection and greatest variety of late 19<sup>th</sup> and early 20<sup>th</sup> century wooden dwellings in the world.”*

CTA considers that the use of conservation areas controls in the existing Isthmus Plan be retained and extended.

Page 6 of the draft masterplan refers to “previous heritage assessments and studies” which had some part in informing the draft masterplan. These are contained in our appendices. They include Ponsonby and Jervois Roads Heritage Study, Volume I, and Streetscape Study, Vol II.

On page 12 the draft masterplan outcome 2 proposes a streetscape design that “respects and interprets all layers of historic and cultural heritage of Ponsonby Road”. CTA supports this: both the recognition of the Māori heritage of the area as well as the European built heritage and history e.g. regarding the name “Ponsonby”.

We dispute the notion that there is a “hole” in the fabric of the street in the section from Franklin Rd to Russell St, attributed to the fact there is little retail activity.

CTA is of the view that the Local Board should be liaising with local building owners to encourage retention of existing heritage buildings. The Local Board could advise owners on mechanisms available to help with this and could assist with heritage grants.

The Auckland Plan Committee and Governing Body minutes of 10 September 2013 state that Council has been mandated to enter a Memorandum of Understanding (MOU) with relevant landowners to undertake historic heritage assessments and appropriate retention of exemplar areas”. For example, Sampson Corporation, would be relevant as a significant property owner along Ponsonby Road as some of their properties may face structural upgrade. An equitable arrangement should be made with owners to retain heritage value for the benefit of future generations.

As regards the churches in the Ponsonby area, while some have heritage listings, their congregations are struggling with maintenance costs and earthquake strengthening issues. Support and advice from the LB could help see these churches stay a part of the community. The Waitemātā Local Board could explore avenues for community input and use, as per the model for the Methodist Church in Ngarauhoe St Mt Eden between its users and the Albert-Eden Local Board.

The following are some specific answers to questions under Arts, Culture and Heritage on the feedback form:

*Ponsonby Road has an important history that contributes to the character and identity of the area. What area or features are special to you and why are they special?*

The places of built heritage and character on Ponsonby Road are the special and valued features.

Another is the VAANA mural at the intersection of Ponsonby, Karangahape, Newton and Great North Roads. It forms an important part of New Zealand's nuclear free history and also now represents an important aspect of Auckland as a Peace City.

*One of the aims of the draft masterplan is to showcase the significant history and identity of Ponsonby Road through public art and Council signage. Do you agree with the suggested sites for public art or propose other or additional sites?*

CTA supports in principle more public art throughout Auckland City. We support subtle and attractive signage. We submit that there should be an actual rimu tree instead of a sculpture to take the place of the fallen rimu and it should form part of an initial pocket park (to be expanded in the future) near the VAANA mural. We note that in 1984 the square in front of the VAANA mural was to become at Peace Park.

## **TRANSPORT AND MOVEMENT**

**Outcome 3**, Make Ponsonby Road safer for pedestrians and cyclists along its length is supported.

CTA in principle supports the proposals for improved facilities for cyclists but has concerns about the legibility of the route for both cyclists and motorists (who need to be aware of where the cyclists are) in terms of switching the cycle lane from north to south in different parts, with other options changing during peak hours, and contraflow lanes. This could result in confusion and accidents – especially amongst newcomers to the area, including tourists.

We submit that the cycle option should be consistent and permanent and that consideration be given to where such cycle lanes lead to and how they connect with other cycle routes, such as the north western cycleway and Skypath. CTA encourages the lowering of the speed limit to 35km/h along the length of Ponsonby Road. We note that the approaches to Queen St in the central city have a 30km/h speed limit and that this seems to work well..

The Auckland Transport trial parking scheme in St Mary's Bay in its present form is a big success. Residents are very happy with the trial scheme and have proposed minor adjustments to cater for businesses and staff parking rights. The draft masterplan supports this present trial scheme. CTA strongly supports this parking scheme. Concerns by local residents that Auckland Transport may consider adopting and completely different parking scheme should be noted.

We support the threshold treatment of continuous footpaths across side streets to give priority to pedestrians (as should be implemented throughout the city).

More pedestrian crossings along the road (where pedestrians currently prefer to cross) would further assist with safety.

We note that painted cycle lanes are throughout the rest of Auckland and would seem to work. Slowing traffic to 35kph along the length of the road should further assist with pedestrian and cyclist safety.

We suggest removing the on-street parallel parking in Redmond Street and reinstating the free left turn from Redmond Street into Jervois Road to help traffic flow.

CTA supports the concept to prioritise pedestrians at Pollen St. The pedestrian use in this area will increase once the “Soho hole” space is developed.

CTA does not support the proposal to make the Great North Road /Ponsonby Road /K’ Road / Newton Road intersection a “Barnes dance” crossing. The pedestrian count at this intersection is not high, certainly compared to those on Queen Street in the city centre, with most pedestrians going around the corner from Ponsonby Rd to K’ Rd and not needing to cross the intersection. It is a high vehicular traffic volume intersection, where two major arterial roads cross. Reducing clearance times at this intersection will have a major knock-on effect on to Ponsonby Rd and Newton Rd, as both have traffic light controlled intersections only a short distance from this intersection. Newton Road is a feeder road to the north western motorway, and as such, will always have significant traffic volumes.

CTA supports the proposals for the Rose Road and Williamson Ave areas. This will add to the Pollen St area developments and encourage pedestrian and visitor use.

Ponsonby Road is still a major cross town arterial road. Many of the suggested measures may contribute to reducing local traffic and encouraging local residents to walk or cycle. However, significant traffic use is inevitable. Any local resident needing to access the central isthmus or the eastern side of the north western motorway is practically forced to use Ponsonby Rd.

Some of these options would seem to have legibility issues in that the layouts will change along the road length, whereas at present the road reads consistently along its length.

Consideration may need to be given to the fact that loss of parking may affect the push to make the retail sector more vibrant.

We agree that dedicated bus lanes are not needed along Ponsonby Road, as the only services that uses the road is the Inner Link bus at a frequency of one every 10 minutes at the most.

## **NATURAL ENVIRONMENT AND OPEN SPACE**

The Working Group has expressed concern over the current environment of this streetscape for people who use Ponsonby Road. In particular, the footpath quality and lack of opportunities for pedestrians to pause, sit and enjoy the surroundings and views back to the CBD and Waitākere Ranges.

We support the provision of seating to enable people to enjoy the views. We note that there is no proposal for street furniture design in the draft masterplan.

### **Ponsonby's Natural Environment**

Ponsonby Road is a busy main street. It is currently dotted with London Plane trees as well as other native and exotic trees. There are mature trees on some of the properties which front Ponsonby Road that provide amenity to the urban realm of Ponsonby Road.

We note that if new developments are to define the street edge by adjoining the street then this does not leave much room for the planting of new trees.

The deciduous exotic plane trees of the Ponsonby area drop their leaves in autumn and winter. Whilst this has benefits for allowing additional sunlight through to the street in the colder months, it puts stress on storm water infrastructure increasing the chance of surface flooding and adding significant costs due to street and drain cleaning.

Sunlight is a very important factor in making an area attractive and liveable. We note that minimal stress is put on storm water infrastructure if street and drain cleaning is carried out to the required level and question the "significance" of the cost. We suggest that if the people who live, work and play in Ponsonby Road were asked whether they would accept a small increase in rates to enable them to retain more sunlight / would be willing to be involved in a community initiative to help pick up the leaves, they would answer in the affirmative.

We support the above actions and principles except that indigenous species be used in preference to exotics. The London planes are part of the heritage of the area and the maintenance that their presence leads to (picking up the leaves) should not be considered an insurmountable burden - it is dealt with the world over in those communities lucky enough to enjoy the presence of trees, and can sometimes be resolved through community participation, e.g. through church and school participation. An example of such community participation in this area is the upcoming Grey Lynn working bee on 6 October.

CTA supports daylighting the Tuna Mau stream and suggests that the high cost could be lowered through community involvement, including the local schools.

We also support improving the appearance of the reservoir wall and note the spatial connection with the VAANA mural around the corner in K' Road.

The micro spaces proposed at the intersection of Ponsonby Road and Collingwood Street would be better placed as one space at the Anglesea Street intersection, an area which is popular with locals and tourists due to the views of the city, the harbour and Rangitoto and the harbour. Seats could be provided here and possibly a public toilet.

As St John's Methodist Church is privately owned we do not see that the proposal regarding its interface with Ponsonby Road should be considered a priority and that improving public spaces should be the prioritised in the draft masterplan.

We endorse the statement that "this is a much loved heritage building that contributes to the identity of the area". We note that at present the church could benefit from some

maintenance. As a Category II listed heritage building, the Local Board could encourage the owners to maintain this building and offer assistance in the way of heritage grants or incentives.

As All Saints Church is privately owned we do not see that the project involving this area should be considered a priority and that improving public spaces should be the prioritised in the draft masterplan.

A priority for the paving design would be to ensure that it is robust, is non-slip (including in the rain) and cleans well.

## **OPPORTUNITIES AT 254 PONSONBY ROAD**

In 2006, Council purchased the site at 254 Ponsonby Road to provide an urban square in the heart of the Ponsonby business area for community gathering and events.

We question the statement in the draft masterplan that development of this site should not “create gaps in the continuity of retail that reduce the viability of Ponsonby Road”. This would seem to counter the reason for which the site was purchased and does not reflect reality, where vibrant centres often have a mixture of uses. Furthermore, it would seem to be an artificial construct, counter to other statements in the draft masterplan about respecting the varied nature of the street. This statement ignores the churches and their contribution to the street. Western Park is a substantial break in the built streetscape and is not valued any the less.

We also challenge the statement that “public open space needs to be “defined by active uses such as cafes and retail outlets”.

We note that across the road from 254 Ponsonby Road is the new development at 221 which does not have a good design outcome and therefore is not a good outlook from the 254 site.

We suggest that Council could generate revenue by selling this site and developing community open space elsewhere in Ponsonby, not necessarily on Ponsonby Rd itself.

The main disadvantage of Concept A is that it has a small open space and note that the purpose for which it was purchased was to provide open space for the community. Open space in this densely settled heritage suburb is low by city standards. Any proposal for this area should maximise the amount of public open space.

Another disadvantage of Concept A is that (as we have mentioned above) commercial premises do not provide passive surveillance at night-time (which is when surveillance is important).

Concept B provides a (comparatively) medium open space.

Concept D is the best approach from those provided. CTA would prefer this site to be retained largely as open space

However, we note that other properties used by the Council for community purposes have been mooted for sale. A similarly flexible approach should be taken if the site at 254 Ponsonby Road is to be retained. Supporting the Board's desire for connectedness, the Board might explore the purchase of the house in the north western corner of Tole Street, which could be resited, thereby connecting from Tole Reserve to Ponsonby Road.

## **IMPLEMENTING THE MASTERPLAN**

The following are some specific answers to questions under Implementation on the feedback form:

*The draft masterplan identifies a list of projects and initiatives. Which projects do you think are most important to do in the next 10 years?*

CTA is of the view that it is important to NOT do any of the projects and listed under Land Use and Catalyst Site Actions on page 49 until heritage and character assessments are carried out for the Ponsonby Road area. We consider these assessments to be the most important projects, and this is in line with the Local Board Plan.

The projects listed under Arts, Culture and Heritage Actions are less important than putting protections in place for the heritage that is currently extant. Some of the art works projects we have suggested should be "real" projects i.e. the daylighting of the Tuna Mau stream and the planting of a rimu to replace Te Rimu Tahī.

Identify and assess the built heritage. (Not on list)

*Has the masterplan missed anything that is important to you that you would like it to address in the next 30 years?*

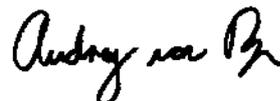
Identifying and assessing the built heritage of Ponsonby Road.  
Creating a park in front of the VAANA mural.

Please also refer to our Appendix entitled "Centre Plan and Heritage Study".

This includes the Ponsonby Centre Plan and the Jervois Roads Heritage Study, Volume I, and Streetscape Study, Vol II, which have identified certain heritage buildings. These studies should inform the draft masterplan but will first of course require updating. Such a review should take account of physical changes that have occurred since those studies were drafted, along with changing values that may now attach to the places.

Date of submission: 16 September 2013

Signature:



Secretary, Civic Trust Auckland