



Submission by Civic Trust Auckland on a proposed plan change

We wish to make a submission on Plan Change 7 to the Auckland Unitary Plan.

Name: Mrs Audrey van Ryn (Secretary)
Organisation: Civic Trust Auckland
Phone (daytime): 368 1516
Phone (evening): 368 1516
Mobile: 021 035 4431
Email: cta@civictrustauckland.org.nz
Postal address: PO Box 74 049 Greenlane

The reasons for our submission are as stated below.

1. Civic Trust Auckland

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.

2. Introduction

Proposed Plan Change 7 (PPC7) seeks to recognise the considerable heritage values of identified historic heritage places by adding them to the Auckland Unitary Plan (AUP) Historic Heritage Overlay, identifying them in Schedule 14.1 and the associated planning maps.

The Section 32 analysis undertaken for PPC7 recognises additions to the Schedule are the most efficient and objective means of achieving Council's heritage objectives, as set out in the AUP. The analysis goes on to consider Council's various options in progressing this plan change. It acknowledges that by doing nothing the values of identified places will not be protected, which may lead to the loss of their significant historic heritage values through inappropriate subdivision, use and development.

Each place included in PPC7 has been evaluated as part of the development of the AUP, and the methodology used in the process of evaluating historic heritage significance is based on the following steps in the AUP's Regional Policy Statement::

1. Identification and evaluation of heritage value against historic heritage significance factors set out in Policy B5.2.2.(1) of the AUP, being (a) historical, (b) social, (c) Mana whenua, (d) knowledge, (e) technological, (f) physical attributes, (g) aesthetic, and (h) context.
2. Preparation of a statement of significance.
3. Statement of whether the place meets the threshold for scheduling as a historic heritage place (Category A or Category B), or an historic heritage area.
4. Recommendation as to whether the place should be scheduled and, if so, definition of the extent of the area recommended for scheduling.

PPC7 as publicly notified, included tabular entries for Schedule 14.1, along with a series of Google maps with extent of place denoted. To that end, the public appears not to have been provided with site specific details about steps 1 and 2 above, and submitters on the plan change must therefore rely simply on their confidence in Council's processes.

In relation to those places proposed therefore, Civic Trust Auckland accepts that the places proposed by Council merit protection and therefore submits in support of the plan change.

Notwithstanding our general support, we do make particular comment on several places proposed, as follows. CTA submits that both Spooner Cottage (The Anchorage) (former) at 2/347 Tamaki Drive, St Heliers, ID 02827 and St David's Presbyterian Church, 68-70 Khyber Pass Rd, Grafton, ID 02804 should have an Extent of Place that covers the full site (in the case of St David's, refer to page 69 of Heritage Assessment completed by Burgess and Treep Architects and attached in Appendices to this submission.

3. Amendments to PPC7 proposed by Civic Trust Auckland

Council's Section 32 analysis acknowledges various sources of buildings for consideration under PPC7, including nominations by the public.

Civic Trust Auckland made submissions to the Independent Hearings Panel (IHP) in the Unitary Plan process for a number of buildings to be added to the Schedule. It did not advise owners directly of these submissions but instead, took the view that the ability for those owners to make further submissions on CTA's primary submissions provided adequate opportunity for participation.

While legislation specifically empowered the Independent Hearings Panel to ignore CTA's submission in the Unitary Plan process, PPC7 is administered under the Resource Management Act, and in that context CTA contends that Council should accept these additional buildings proposed by way of amendment by CTA.

The IHP engaged directly with CTA about its proposed additions to the Schedule and in its Decision Report on Heritage Schedules (Topic 032), it did not support the addition of

these buildings since it took the view that the landowners were (a) not made aware of the proposed additions and/or (b) there was insufficient evidence supporting the recommendations.

CTA anticipates that Council may view its (CTA's) proposed amendments as out of scope for PPC7. As noted however, CTA did submit expert evidence, and the IHP subsequently recommended that the protection of such additional buildings should be advanced by way of a future plan change, and CTA contends that PPC provides just such an opportunity.

4. Additional Documentation

CTA has further documentation supporting this submission which has been emailed separately. It comprises a document outlining those places proposed by way of amendment, as well as two particular buildings included in PPC7 by Council itself namely, St David's Church at 68-70 (ID 02804) Khyber Pass Road and a three-storey commercial building at 8 Elliott Street (ID 02792) (noted by Council in PPC7 as Darby Building, 8-18 Darby Street).

5. Conclusion

The decision we wish the Council to make is: to make the proposed Plan Change operative, including the amendments proposed by CTA.

We do wish to be heard at the council planning hearing.

Date of submission: 9 February 2018

Signature

A handwritten signature in black ink, appearing to read 'Audrey van Ryn', written in a cursive style.

Audrey van Ryn
Secretary, Civic Trust Auckland