

## **Submission by Civic Trust Auckland on:**

- Auckland Plan 2050
- 10-Year Budget and Local Board Priorities
- Draft Auckland Waste Management and Minimisation Plan 2018
- Tūpuna Maunga o Tāmaki Makaurau Authority Draft Operational Plan 2018/19
- Proposed Regional Pest Management Plan

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Civic Trust Auckland (CTA) is a non-profit public interest group, incorporated 50 years ago, 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.

CTA has provided submissions on Council and Local Board plans for many years and was invited as a regional stakeholder to present to councillors on 27 March for this current consultation process. We presented some of our points with regard to the Auckland Plan 2050 at that time.

## **AUCKLAND PLAN 2050 (SPATIAL PLAN)**

(1) CTA hopes that Auckland Councillors, especially the new ones, will be able to familiarise themselves with the previous Auckland Plan, released in 2012, so that they are able to compare its content with the "refreshed" draft. We encourage Councillors to also read various other legacy plans, as some of these contain valuable information, perspectives and actions that are not currently at the planning tables.

One example is "Growing Smarter - The Auckland Region in the 21st Century - An Evaluation of the Auckland Regional Growth Strategy 1999 - A Technical Report for the Auckland Regional Growth Forum," which could usefully inform the Auckland Plan, particularly with regard to Auckland's built and natural heritage.

- (2) CTA notes that with regard to the previous Auckland Plan, released in 2012, it was stated by Council that the plan would contain a number of KPIs and that "these should all be specific, measurable, achievable, realistic and time-bound." We are not convinced that this intention has been carried through to the refreshed version. Similarly, the action lists in Table 6 of the Addendum to the Auckland Plan 2012 support well-developed strategic directions arising from all chapters of that plan, and we see little merit in diluting or discarding much of that work already done
- (3) The Auckland Plan outcomes are intended to be given effect to by the Unitary Plan, and the Unitary Plan is administered under the Resource Management Act. Section 3 of the RMA provides a definition of the term "environment," and that definition includes both the natural and physical environment. The physical environment includes the built environment, the built environment in turn includes historic heritage, and section 6(f) of the RMA requires that Council provide for the protection of historic heritage as a matter of national importance. We provide this clarification because insofar as the Unitary Plan will give effect to the Auckland Plan, historic heritage is, for legal purposes, part of the environment, but that reality appears to have been virtually ignored by those driving this refresh process. We maintain therefore, that historic heritage demands much greater attention in the Auckland Plan 2050 than appears to be Council's current intention.
- (4) The Auckland Plan 2012 had its own dedicated chapter on historic heritage, notwithstanding that such a chapter was excluded from Council's original draft proposed in 2011. Subsumed in that original draft, under the umbrella of "cultural heritage," a dedicated chapter was only included after concerted pressure from well-informed parties, including the NZ Historic Places Trust (now Heritage NZ) and Auckland Council's own Heritage Advisory Panel, as well as a broad spectrum of the community, 88% of whom do value 'historic' heritage.
- (5) In the Auckland Plan 2012, the dedicated Chapter 4 runs to 14 pages and contains a comprehensive set of targets, priorities and directives, including Strategic Direction 4, which is to "Protect and conserve Auckland's historic heritage for the benefit and enjoyment of present and future generations" (pg 124).
- (6) Council staff have expressed concerns about the 2012 Auckland Plan and have set Councillors on a path to "refresh" that plan. Outcome 5 of the draft Auckland Plan 2050 is

entitled *Environment and cultural heritage* and it proposes that "Aucklanders preserve, protect and care for the natural environment as our shared cultural heritage, for its intrinsic value and for the benefit of present and future generations."

- (7) It appears that Council's proposed "refresh" is seeking yet again to intentionally marginalise historic heritage and subsume it under the umbrella of cultural heritage. Perhaps Council's current intention to remove the chapter on historic heritage is based on its misguided assertion, in its evidence report on environment and cultural heritage (February 2018), that 88% of the community value "heritage." What in fact the community indicated through Auckland Council's People's Panel "Historic Heritage Survey" December 2011 was that "88% believe that protection of historic heritage is important." It should not be necessary to repeat, but lest it fall on deaf ears, we reiterate that almost 90% of Aucklanders believe that the protection of historic heritage is important, and this is entirely consistent with Council's obligations under the Resource Management Act.
- (8) While historic heritage has come under increasing threat over the past six years, there is no evidence that Aucklanders value their historic heritage any less, and we therefore contend that it is entirely appropriate that the chapter should be retained through the current "refresh process." Outcome 5 is the one that most closely relates to historic heritage, and if ultimately Council decides not to retain the plan's existing Chapter 4, historic heritage should at the very least be explicitly included in outcome 5 of the "refreshed" plan.
- (9) CTA agrees that the Auckland Plan could be improved and we support updating the data and providing it in digital form so that it can be easily accessed and updated. We do not, however, support removing material from the plan unless it's outdated. This plan, as stated in its foreword, involved huge engagement by Aucklanders. As acknowledged by the mayor at the time, "The quality and effort evident in the submissions and other input is simply staggering" (pg 2).
- (10) Council has its own obligations to meet in regard to the Auckland Plan. Its duties are outlined in section 79 of the Local Government (Auckland Council) Act 2009. That legislation states at s79(4)(c) that Council must "provide an evidential base to support decision making for Auckland, including evidence of trends, opportunities, and constraints within Auckland." In Auckland Plan Refresh workshops conducted for Councillors, it was contended that historic heritage is a constraint rather than an opportunity, and we believe that this perverse thinking continues to render Council, to some extent, an impediment to heritage protection in Auckland.
- (11) That legislation goes on, in section 79(4)(e)(iv), to require that Council's spatial plan, i.e., the Auckland Plan, "must identify nationally and regionally significant areas of historic heritage value within Auckland." After six years and despite formal advice from Council's Heritage Advisory Panel, Council continues its failure to meet its obligation to properly identify heritage. It is unsurprising therefore, that Council has failed to complete one of three actions in the implementation plan from the addendum to the Auckland Plan. This required Council to "provide a comprehensive and coordinated information service for Auckland's historic heritage" by 2015, and Council's Auckland Plan "refresh," as proposed, will only perpetuate this ongoing failure.
- (12) Chapter 4, "Auckland's Historic Heritage," is as valid now as when it was written. We end by quoting from several passages in the chapter: "Our heritage is a legacy to pass on to future

generations. Heritage reinforces our sense of history and place, is central to our well-being, and helps define what is unique and distinctive about Auckland. It is more than a social or environmental asset; it is also an important driver for economic development" (page 125). "Aucklanders are passionate about historic heritage" (page 126), and "On behalf of the community, the Auckland Council will continue to develop initiatives to ensure innovation, good practice and improved heritage outcomes" (page 129).

- (13) Although option 4 that Council chose for the refresh was to "set high-level objectives, both spatial and non-spatial" and to "exclude any further non-spatial initiatives, narrative or detail," the refresh documents contain much non-spatial material. Furthermore, the simplifying of the plan seems to have reduced the content so much that there is an overall impression of vagueness and no assurance of targets. Targets are needed so that Council is committed to action.
- (14) The Auckland Plan 2012 also had an entire chapter called "Auckland's Arts and Culture" and another entitled "Auckland's Recreation and Sport." These chapters are no longer in the plan and we reiterate that we object to removing material from the plan unless it is outdated.
- (15) Regarding the Transport and Access outcome in the Auckland Plan 2050, we note that principles of universal access are enshrined in various documents such as the Urban Design Manual but in practice Auckland Council itself is not always adhering to these principles, two examples being the K'Rd CRL station in term of access for people with mobility issues to ascend Mercury Lane from the station, and another being the lack of contrast, for the benefit of people with low vision, in aspects of the stage in the Pioneer Women's Hall at the recently upgraded Ellen Melville Centre in the city centre, as well as there being a barrier to wheelchairs in terms of a door sill when accessing the Betty Wark room in the same venue, directly from Freyberg Square.
- (16) CTA supports improved transport networks, particularly active modes of transport, which are being used more across the city as time goes on. Auckland Transport's initiatives to encourage this are supported, such as the Auckland Walk Challenge being run by AT during March this year. We feel that better consultation with residents and businesses is needed for better outcomes. In particular, we not support the removal of trees to accommodate cycleways. We encourage AT to add to the urban forest, not detract from it.
- (17) The Auckland Unitary Plan is meant to give effect to the Auckland Plan. The Local Government (Auckland Council) Act 2009 states that Auckland Council "may amend" the Plan. There is no imperative stated and CTA submit that what Council staff have proposed through this so-called "refresh goes at this stage well beyond what was reasonably anticipated by the enabling legislation.

## **LONG TERM PLAN (10-Year Budget) & LOCAL BOARD PRIORITIES**

- (1) If the money in the **Built Heritage Acquisition Fund** is not spent in a particular budget year, that does not mean the requirement for funding has been satisfied. There are a great number of buildings that could benefit from financial assistance but the magnitude of the fund is far from adequate to meet the actual need for assistance. Any unallocated funds in a particular year should therefore be rolled over into the following year.
- (2) Funding for the **Regional Historic Heritage Grants Programme** should be increased from \$807,000 each year to at least \$500,000 each year. We note that smaller Councils provide a proportionally larger budget, e.g., the Waipa District Council with a population of 40,000 has a budget of \$70,000. In the context of its annual budget, Auckland Council simply has not allocated adequate funds to recognise and provide for the protection of historic heritage in accordance with its duty to do so pursuant to RMA s(f).
- (3) CTA supports the **regional fuel tax** to help fix the issue of congestion, but not if it results in public transport fares going up. It must be cost neutral for public transport users.
- (4) We support **targeted rates for environmental clean-up** (e.g. the poor water quality of our harbours and beaches) and endangered species (e.g., kauri dieback.)
- (5) We support **disestablishment of Auckland Council Investments Limited**, bringing ownership of airport shares and Ports back into council.
- (6) We support increasing funding for the Auckland **Heritage Festival**, the attendance numbers for which grow year on year. CTA has run a variety of events in the festival for the last 10 years and have appreciated Council support in this regard.
- (7) We support an increased budget for the **Auckland Museum**, **MOTAT** and the **Sir George Grey Special Collections** at Auckland Libraries.
- (8) We support increasing the budget for repairs and maintenance to **Council's own historic** assets.
- (9) We support the elimination of **agrichemicals** in parks and on roadsides.
- (10) The number 2 priority for achieving Council's strategic direction (#4) in relation to heritage was expressed in the Auckland Plan addendum on implementation. It was to "develop a suite of incentives to conserve heritage in conjunction with private owners and developers". This was to be completed by 2015. This has not been done and CTA urges Council to progress this matter.

## **Local Board Priorities**

- (a) We support all local boards working with their communities to implement sustainable practices, particularly reducing the use of single-use **plastic bags**.
- (b) We support all local boards working with neighbouring local boards and community groups to develop management plans for caring for **urban streams**.

- (c) We support all local boards seeking to implement and **improve walking and cycling facilities** but we do not support the **removal of trees** as part of the process. We believe the design of cycleways could be much better, including their aesthetics, and we believe that better **consultation** needs to be carried out with local residents and businesses in this regard. We do not support the recent proposal that children up to the age of 12 be permitted to cycle on footpaths unless the footpath has specifically been designated for cycling. (d) We support the advocacy by local boards for **light rail**.
- (e) We support all local boards seeking to **reduce waste** to landfill by planning for community recycling centres, supporting local zero waste groups to set up and run new facilities, and increase recycling and re-use.
- (f) We support all local boards attempting to manage the dog populations in their areas, such as with dedicated dog exercise areas. We do not support **dog exercise areas** moving other activities or community groups out of spaces that they currently use if this space works well for them and/or if they have traditionally had a long association with the area, the archery club on Mt Albert being an example of this.
- (g) We propose that all local boards consider supporting their community in setting up a community fridge (refer our submission point under the **Draft Auckland Waste Management and Minimisation Plan 2018).**
- (h) Wherever local boards are looking to provide or improve facilities for **public toilets**, we encourage them to consider providing public **showers and lockers** as well, for use by people who are exercising and/or using active transport modes to travel to work, for travellers and for homeless people.
- (i) We support local boards (such as Whau) that have stated that they are supporting the Government's initiatives to address **climate change**.
- (j) We support **cooperation between local boards**. There are opportunities to learn from each other, by means of consulting on any plans that they have developed which could be adopted or adapted by other local boards, such as the "Ethnic People's Plan" which is a current focus of the Whau Local Board.
- (k) We support significantly increasing the overall budget for the environment. We propose that some tourist contribution (such as a targeted charge on the providers of AirBnB accomodation) could be used to support the natural environment, as well as our built heritage and arts.

#### Albert-Eden

(i) We do not support the priority of making a start on the development of Chamberlain Park. We would like to see the present golf course retained. As the only public golf course on the central isthmus, Chamberlain Park is not just a local park within the Albert Eden Local Board area but a city-wide asset. In terms of green space being available for people in this local board area, Chamberlain Park as being close to: Auckland Zoo, Western Springs Park, Fowlds Park, MOTAT, and all the associated Meola Reserve spaces. As a public course, Chamberlain Park performs a city-wide function, providing access to golf for a wide cross-section of the population,

in terms of age, gender, ethnicity and socio-economic status. It is particularly patronised by those from Maori and Pacific Island communities.

- (ii) We support providing funding to the community to identify, maintain and care for notable trees in Albert-Eden.
- (iii) We support a cycling and walking connection between St Lukes and Greenlane train station but not if this means removing trees, particularly not the stretch of trees between Wheturangi Road and Great South Rd, the retention of which was hard-fought by the local community around 45 years ago. As a general observation, long-established communities should not have to relitigate previously fought battles each time there is a new set of Council employees comes up with some bright new idea.

#### Great Barrier

- (i) We support this local board's support for the community initiatives of the Life-long Learning Strategy and the Dark Sky Sanctuary.
- (ii) We support the board continuing to seek funding implement a solar micro grid with electric vehicle chargers for the council buildings at Claris.

## Henderson-Massey

We support refreshing the Henderson heritage trail to also express the Māori history of the area.

## Hibiscus and Bays

CTA has long advocated for more ferry services throughout Auckland and strongly support this board working with Auckland Transport to trial a weekend ferry service at Gulf Harbour.

#### Howick

- (i) CTA supports the continued management of coastal erosion and sand replenishment, including continued advocacy to the Governing Body for a regional fund.
- (ii) We support consideration of the concept of creating pest-free areas or "mainland islands."

## Kaipātiki

(i) We support redeveloping a park in Birkenhead which is currently the "Birkenhead War Memorial Park". Unless there there was some obligation created at the time the park was so-named, we suggest that this be renamed "Birkenhead Peace Park" in order to shift the focus of redevelopment onto peace rather than war.

- (ii) We support this Board in continuing to support Pest Free Kaipātiki and other environmental initiatives, including predator and weed management and improved water quality in streams and other waterways.
- (iii) We encourage this Board to work with the community and with Council departments to implement with urgency a coordinated project by re-prioritising track funding towards preventing the spread of kauri dieback into reserves and SEAs with significant kauri.

## Māngere-Ōtāhuhu

CTA supports the historic Ōtāhuhu Portage route project with the potential to open the area for recreation, walking and cycling in the future. (We note that CTA, in conjunction with Walk Auckland, held an event during the 2017 Auckland Heritage Festival which traversed this route: "a south portage walk.")

#### Manurewa

We support upgrading the fields and facilities at War Memorial Park and the request for funding as part of the 10-year Budget. We suggest that as part of this upgrade, the park be renamed as a "Peace Park" and that a focus on peace rather than war is reflected in the upgrade.

## Maungakiekie-Tāmaki

- (i) This board has noted that the right transport infrastructure needs to be in place to match the high population growth projected for this area. We observe that Onehunga is not well-endowed with cycle lanes. Improving transport infrastructure as part of the redevelopment of the town centre should recognise the amenity of the Onehunga Mall, where the relaxed pace for shoppers due to the traffic management is one of the very positive aspects of this area.
- (ii) Local people report that they do not feel that Onehunga is a safe place to walk, drive or cycle and that they do not see the benefit of any improvements. Neilson Street in particular suffers from speeding traffic and perhaps needs speed cameras to be employed here.
- (iii) We acknowledge that access to the different transport modes in the town centre needs improvement and we support the moves to achieve this along with robust public consultation and recognise that the need for future proofing is important. Onehunga's train service has brought great benefit with regard to transport options, and the train station is modern, with parking facilities.
- (iv) Regarding the priority of "working with the community, police, business associations, volunteer safety groups and other organisations on initiatives to reduce and prevent crime as well as increasing local monitoring of our public spaces," local people do not consider that the foreshore of Onehunga is safe. There is concern that the local police station does not ever seem to be manned.

(v) The development of the foreshore at Onehunga seems to have required more consultation with the range of stakeholders: the development of the beach seems contrary to plans to put a motorway next to it.

#### Orakei

- (i) We support a community facility for Remuera to service its large population, including space for public meetings.
- (ii) The number one priority for Tamaki Drive would be the activation of the traffic lights at the Tamaki Drive / Ngapipi Rd intersection. (This may have happened in the last few weeks.)
- (iii) CTA very strongly supports the focus on Kepa Bush and Pourewa Valley for ecological restoration and better accessibility.

## **Ōtara-Papatoetoe**

- (i) We support enabling adults to access Ōtara-Papatoetoe swimming pools at no charge, funded through a targeted rate.
- (ii) We strongly support light rail between the airport, Manukau and Botany.

## Papakura

- (i) CTA supports funding for a multi-storey park-and-ride facility at the Papakura train station as a means of encouraging more people to use public transport.
- (ii) We support protecting local heritage by working with mana whenua and the Papakura Museum to identify wāhi tapu, taonga and heritage buildings and to start the development of a Papakura heritage trial.
- (iii) We support investing in solar panels and a cover for the Massey Park Pool, which will extend the swimming season and usage of the Massey Park external pool.

#### Puketāpapa

- (i) We strongly support retaining Liston Retirement Village as housing for seniors rather than being turned into parkland.
- (ii) With regard to developing concept plans for Mt Roskill War Memorial Park, we suggest that the park be renamed "Mt Roskill Peace Park" and that a focus on peace rather than war is reflected in the concept plan.

### Rodney

We support the development of park-and-rides in Warkworth and Kumeū/Huapai.

## Upper Harbour

We support protecting and conserving Upper Harbour reserves through methods such as restoration planting.

## Waitākere Ranges

CTA supports this board advocating for a proportion of environment funding to be specifically allocated for use in the heritage area and to address kauri dieback as a very real danger.

#### Whau

- (i) Encouraging more local businesses and jobs is seen as a very useful and practical measure and one that other local boards could also focus on.
- (ii) Supporting central government's initiatives to address climate change should be high priority for all local boards.

#### Waitemata

- (i) We support the key advocacy project of the full site civic and green space at 254 Ponsonby Road, seeking \$5.5m in the 10-year budget for stage 1 of "Ponsonby Park." This space will beautify and enliven Ponsonby and create a meeting place for the local community as well as visitors to the area. We further support Council working in pursuit of options with adjacent private landowners that could result in an outcome better integrated with character buildings in the immediate locality and reduce the need for Council contributions to this project. We invite Council to engage with CTA to investigate such options.
- (ii) We encourage this Board in identifying heritage (as stated in its 2017 Local Board Plan Outcome 4).
- (iii) We encourage the consideration of heritage preservation/restoration opportunities and universal access principles with regard to City Rail Link stations in the central city.
- (iv) We support the 2017 Local Board Plan Outcome 3, an objective to increase the urban forest.
- (v) A possible future heritage project could be St David's Church, Khyber Pass, which is likely to become a community facility in an increasingly intensifying residential area.
- (vi) We support the local board priority to "raise awareness and enhance provision of city centre facilities based on a needs and gaps assessment. Examples include toilets, showers, lockers, drinking fountains and device charging stations." We suggest that there needs to be a more comprehensively developed needs and gaps assessment and that this should be informed by data from the Auckland City Mission, Llfewise and Gimme Shelter, e.g., the latest count of people sleeping outside within the local board area (or at least in the city centre). The facility provision should include a night shelter, and a good model for this is the Dunedin Night Shelter.

With regard to drinking fountains and device charging stations, the former should be installed in Griffiths Gardens and the latter, in Griffiths Gardens, need to be repaired and maintained.

## DRAFT AUCKLAND WASTE MANAGEMENT AND MINIMISATION PLAN 2018

- (1) We support this plan as long as it is cost neutral between rates and charges.
- (2) We support option two: "Keep going as we are and expand our focus to include the 80% of waste that is commercially managed."
- (3) We note on page 8 of the plan under "Food waste is an opportunity" that consideration is not given to food waste for feeding people.
- (4) Food should not be considered as waste unless it's inedible, and more of it should be rescued instead of thrown away, by means of such initiatives as community fridges such as the one in Griffiths Gardens in Wellesley St and unrefrigerated spaces (pantries), such as the one in Brookfield Ave, Royal Oak, and public awareness about them. Every local board area could have a fridge/pantry.
- (5) We support readily available information on the Council website, such as "How to get rid of unwanted items" and would like to see further useful information such as how to set up a community fridge and how to go zero waste.
- (6) We note that the Neighbourly site is a good way for people to pass on unwanted items.
- (7) People working in retail outlets who routinely offer single-use plastic bags for the carriage of one or two items should be educated not to do this.
- (8) We are encouraged by the increase in community recycling centres. Perhaps more of these places could accept batteries.
- (9) Reverse Garbage: industrial and commercial discards, off-cuts and over-runs that provide high-quality, low priced, useful and unusual materials for use in arts, craft, education, small business, home renovation and other activities (<a href="www.reversegarbage.org.au">www.reversegarbage.org.au</a>) could be be increased and based in some recycling centres.
- (10) We urge Auckland Council to address the mess that regularly appears on central city streets as a result of businesses placing their waste on the footpaths. This is very unsightly. The Design Office, under the leadership of Ludo Campbell-Reid should address this issue as a priority. Urban spaces such as the shared spaces are being upgraded but this work is marred by the bad management of waste collection. Council frequently looks to overseas best practice (e.g. bringing experts to address Auckland Conversations) and there are ways that other cities manage commercial waste collection that we could surely learn from.
- (11) Our waste levy is among the lowest of any country with a similar type of levy, and doesn't take into account the environmental cost of landfills. A report by the Waste Levy Action Group shows that increasing the levy to \$140/tonne would reduce waste, increase recycling and create thousands of jobs. CTA would support a gradual increase in the landfill waste levy from \$10/tonne to \$140/tonne.

# <u>TŪPUNA MAUNGA O TĀMAKI MAKAURAU AUTHORITY DRAFT OPERATIONAL PLAN 2018/19</u>

- (1) CTA supports the Authority building strong relationships with volunteer groups such as Friends of Maungawhau, communicating well with such groups and tapping into their store of knowledge, built up over a long time.
- (2) Recognising the need for high-quality tracks and regular maintenance, we see that there needs to be sharing of information and consultation with volunteer groups and the public in this regard, in particular, schedules for track maintenance and desire line rehabilitation.
- (3) Threats such as myrtle rust and possible park closures need to be addressed in the strategic and financial agendas, and weed control and revegetation need to be more closely integrated.
- (4) We support the ranger service that is now being establish and acknowledge the strong lobbying efforts of Friends of Maungawhau on this matter.
- (5) Way-finding and warnings on the maunga are insufficient. Signage should convey a sense of welcome and respect, and give indirect guidance to visitors.
- (6) Individual maunga management plans are needed to give operational direction and detail. Their development should be a priority. Information about time frames and progress in developing the plans needs to be communicated to stakeholders.
- (7) The Maunga Authority needs to work with Council and DOC to prioritise the development of an outdoor recreation plan that encompasses all public parks and the Tūpuna Maunga. Policies on passive recreation and cycling access, especially on the pedestrianised maunga, need to be developed.

## PROPOSED REGIONAL PEST MANAGEMENT PLAN

We sympathise with cat lovers who are upset that cats which are family pets are under threat of being destroyed under their inclusion as pests in this plan. We do not agree that the feeding of homeless cats should become an offence. Perhaps a better approach to dealing with cats with regard to their threat to native wildlife is that the public be discouraged to have as pets species that pose such a threat and that they be educated about ways to keep their pets from accessing areas where there is native wildlife.

Date of submission: 28 March 2018

Signature:

Audrey van Ryn

Andry van B

Secretary, Civic Trust Auckland