



Submission of Civic Trust Auckland

Draft Auckland Plan

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

INTRODUCTION

Civic Trust Auckland is a non-profit public interest group. The Objects for which it was incorporated in 1968 are, within the greater Auckland area:

- a) To promote the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development,
- b) To promote the maintenance and enhancement of public access to and along the coastal marine area, lakes and rivers, To promote the recognition and protection of the heritage value of sites, building, places or areas,
- c) To promote the recognition and protection of the heritage value of sites, buildings, places or areas.
- d) To promote the maintenance and enhancement of amenity values and the quality of the environment.
- e) To acknowledge the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahl tapu and other taonga,
- f) To promote and stimulate public interest in the environment and to improve standards of architecture, town planning and urban design.
- g) To issue, promote or assist in the issue of books, papers, pamphlets, periodicals and other documents relating to the Objects of the Trust, and
- h) To do all such things as are incidental or conducive to the attainment of the above Objects

Civic Trust has associations with other groups, primarily those with an interest in the recognition and protection of Auckland's natural and built heritage, but also others relating to transport.

We made submissions on the discussion document "Auckland Unleashed" on 31 May 2011 and the City Centre Masterplan discussion document "Towards Delivering an Auckland City Centre Masterplan" on 17 June 2011.

We would like to make submissions on various points in the Draft Auckland Plan, primarily those dealing with the matter of heritage. Our submission is presented as a series of comments, the numbering of which corresponds directly with the various points as numbered in the Plan. Council's points are shown in ***bold italicised blue type*** with Civic Trust's comments below.

MAYOR'S FOREWORD

5. ***"We have to do more to protect and restore Auckland's environment. We inherited a precious gift and we have the responsibility to look after it for future generations."***

Comment:

Auckland's future development will occur subject to the Resource Management Act, and the RMA's definition of **environment** includes—

- (a) ecosystems and their constituent parts, including people and communities; and
- (b) all natural and physical resources; and
- (c) amenity values; and
- (d) the social, economic, aesthetic, and cultural conditions which affect the matters stated in paragraphs (a) to (c) or which are affected by those matters

Equal weight is given by legislation to "physical resources" as to "natural resources" and it is important that Council recognise the importance of the built environment, particularly since that is where the overwhelming majority of people live.

6. ***"... we will welcome development appropriate to Auckland."***

Comment:

In managing the use, development, and protection of natural and physical resources, when determining what may be "appropriate development", Council is required by section 6 of the Resource Management Act to:

recognise and provide for the following matters of national importance:

- (a) The preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:
- (b) The protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:
- (c) The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:
- (d) The maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:
- (e) The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.
- (f) the protection of historic heritage from inappropriate subdivision, use, and development.
- (g) the protection of recognised customary activities.

and **have particular regard to:**

- (a) kaitiakitanga:
 - (aa) the ethic of stewardship:
- (b) the efficient use and development of natural and physical resources:
 - (ba) the efficiency of the end use of energy:
- (c) the maintenance and enhancement of amenity values:
- (d) intrinsic values of ecosystems:
- (f) maintenance and enhancement of the quality of the environment:
- (g) any finite characteristics of natural and physical resources:
- (h) the protection of the habitat of trout and salmon:
- (i) the effects of climate change:
- (j) the benefits to be derived from the use and development of renewable energy.

9. ***"We need a radical improvement in the way we design and build our city, and in how we value and incorporate our heritage in this."***

Comment:

Great cities of the world have retained significant elements of their built heritage. Given the decimation of Auckland's built heritage over the last 30 years, "a radical improvement in... how we value and incorporate our heritage" is critical at this stage.

GOVERNMENT FOREWORD

18. ***"Spatial planning ... is a key strategic planning tool ... across Europe, North America, Australia and Asia. The Government recognised the importance of the recommendation made by the Royal Commission on Auckland Governance that Auckland should have a spatial plan, and legislated for that to happen."***

Comment:

On the matter of a spatial plan for Auckland, the Royal Commission's Report said :

*"The Commission is of the view that this plan is the starting point for the protection of Auckland environment and its heritage and the development of good urban design. In this context, the spatial plan would identify the areas for urban growth and redevelopment and the areas that will remain rural. It will identify the parks network and the areas where further parks are required; it will describe the environmental goals and the urban design goals for the region; it will record notable heritage features and buildings."*¹

20. ***"Auckland is predicted to have 60 per cent of New Zealand's population growth over the next thirty years and this growth, provided it is managed effectively, offers New Zealand significant economic and social opportunities."***

Comment:

The Government recognises that Auckland is facing enormous development pressures. Its recognition of the opportunities arising from this development as being economic and social appears to overlook the cultural well-being that should also be provided for.

21. ***" ... effective spatial planning has the potential to help realise these opportunities to improve Auckland's economic and productivity performance and the efficiency of its urban form, liveability and connectedness. Spatial planning can help to maximise value from infrastructure investments, maintain an affordable cost of living and ensure that New Zealand has a city of scale providing a key link to the global economy. To that end, a viable Auckland Plan can contribute to New Zealand's economic, environmental, social and cultural prosperity."***

Comment:

If, to paraphrase, *the spatial plan has the potential to improve Auckland's liveability, thereby contributing to Auckland's cultural prosperity*, the list of initiatives envisaged needs to be broadened beyond infrastructure, cost of living and the global economy.

¹ Royal Commission on Auckland Governance, Report: Recommendations Part 1, Ch. 8 Environment, Urban Design, and Heritage, para. 8.73, pg.199

AUCKLAND – OUR SENSE OF PLACE

AUCKLAND IS MANY DIFFERENT THINGS TO DIFFERENT PEOPLE.
PLANNING FOR THE FUTURE OF AUCKLAND AND ITS COMMUNITIES MUST RESPOND TO
WHAT IS UNIQUE AND SPECIAL ABOUT AUCKLAND.

TEMPERATE
CLIMATE

OUTDOORS LIFESTYLE
AND OUTDOOR LIVING

VOLCANIC LANDSCAPE

CULTURE AND ARTS

CLOSE PROXIMITY OF
BEACH AND BUSH

SPORTING

LINKED REGIONAL
ECONOMIES

RURAL
AND URBAN

OUR MANY HARBOURS

COMPARATIVELY
SMALL

TĀNGATA
WHENUA

WORLD'S LARGEST
PACIFIC CITY

FOUNDED ON
A TREATY
SETTLEMENT

SUBTROPICAL AND LUSH

BUSH CLAD
PARKS

POLYCENTRIC

INCREASINGLY ASIAN

COAST AND MARINE
ENVIRONMENT

TOWNS AND
VILLAGES

WORKING
PORT CITY

GREEN
AND BLUE

YOUNG

MULTI CULTURAL

OUR ENDEMIC SPECIES

OUR CULTURE
AND LIFESTYLE

DIVERSITY

The diagram (above) on page 6 of the Plan outlines those things that Council consider contribute to Auckland's *Sense of Place*, and acknowledges that "planning for the future of its communities must respond to what is unique and special about Auckland." The vital contribution of heritage to a city's unique sense of place is well understood by great cities. It's omission from the diagram above suggests Council may not adequately comprehend this.

SECTION A: THE AUCKLAND PLAN AND HOW TO BE INVOLVED

A.4 Key Implementation Strategies and Plans

37. *“Long Term Plan ... is a statutory plan that describes the Council’s activities, key projects and programmes, and funding information for a 10-year period.”*

Comment:

“The spatial plan must – identify policies, priorities, land allocations and programmes and investments to implement the strategic direction and specify how resources will be provided to implement the strategic direction”² Civic Trust’s submission is informed by excerpts, as quoted in ***“bold italics”*** below from the Long Term Plan - 27 October, 2011.

Long Term Plan 2012-22 – Mayor’s proposal (pages 17 & 18)

“Transformational Shift 4” aims at ***“radically improving the quality of the environment”*** noting ***“Heritage and Culture projects of \$70m over the last 4 years.”***

Long Term Plan 2012-22 – Direction setting (page 4)

“The LTP is where we debate our priorities, how much we are prepared to pay to achieve them and where that funding will come from.”

One key project identified relates to ***“quality urban, rural and natural environments”*** and acknowledges that ***“as our population grows over the coming years we need to ensure that we protect what is valued in our environment”*** and that ***“in order to do this ... some important projects ... need to be prioritised in the LTP”*** including

- ***Unitary Plan – as our key regulatory instrument this will form the basis of the kind of development we need and the protection of our natural and built heritage. Resourcing this work to the appropriate level is essential.***
- ***We have already set aside some funding to enable us to protect some of our built heritage. We need to ensure that we have sufficient regulatory and financial instruments to achieve this.***

Protection of our built heritage is vital to the strategic aim of a quality urban environment. While Council has put \$10 million in a Heritage Preservation Fund to buy, restore and sell at-risk low-return heritage properties where owners are unwilling or unable to invest in them, this will only protect a few select properties. Meaningful success protecting our built heritage will require more than simply amalgamating existing heritage schedules. It will require the comprehensive identification, assessment, *and* recognition in the Unitary Plan, of what significant heritage there is in Auckland’s built environment. Council can only succeed if the Unitary Plan process is appropriately resourced to achieve this. It appears from the Long Term Plan that Council has not provided for those resources essential to its success.

39. *“The unitary plan ... is an important tool for implementing the strategic directions set in the Auckland Plan.”*

Comment:

Heritage schedules in the district plans of previous councils are neither complete nor accurate, so it is timely and appropriate that the Unitary Plan is identified as a key project that will form the basis of the protection of our built heritage.

² Section 79(4)(f) Local Government (Auckland Council) Act 2009

SECTION B: AUCKLAND NOW

B.1 - THE ROLE OF AUCKLAND IN NZ AND THE WORLD

50. *The Role of Auckland in NZ and the world*

Comment:

It is important for Auckland Council to recognise that the approach taken to spatial planning in Auckland is likely to provide an example to be followed by other parts of New Zealand.

57. *Auckland's main competitors are the Australian cities. ... A step change is required to lift our economic performance.*

Comment:

If we are going to compete with Sydney, Melbourne, Adelaide and Brisbane, we should recognise the role of heritage in establishing *their* unique profiles. This should be reflected in *Box B.2 Global mega trends – 5. Increasing competition between international cities.*

B2 - KEY TRENDS AND CHALLENGES FOR AUCKLAND

63. *In addition to these global trends, Auckland has identified several specific and critical challenges over the next 30 years, including:*

- a. population growth and demographic change*
- b. climate change and energy security*
- c. Auckland's international economic competitiveness*
- d. social and economic inequalities*
- e. environmental degradation*
- f. infrastructure planning, provision and funding.*

Comment:

The significant past losses and continuing threats to our built heritage need to be properly acknowledged as part of the challenge identified as environmental degradation.

E - ENVIRONMENTAL QUALITY

96. *To maximise the quality of living in Auckland we need to value our environment, find ways to reduce negative impacts upon it and participate in finding solutions to global environmental challenges. Auckland (and its surrounding regions) is highly prized for:*

- *our splendid harbours, islands and beaches*
- *the wild west coast and gentler east coast*
- *our extensive rural environment to the north and south*
- *our volcanic landscape*
- *our built heritage*
- *our extensive network of parks and open spaces*
- *our native bush.*

Comment:

Whilst it is acknowledged that our environment encompasses valuable aspects such as our volcanic landscape, greater cognisance is required of the fact that for most of us in our day to day lives our environment is the *built* environment.

97. *Our unique environment contributes to the quality of living that sets Auckland apart from other places in the world. It also provides leverage for economic advantage, accounting for Auckland's appeal to visitors and migrants.*

Comment:

As for point 96 above, our built environment is equally what establishes our uniqueness.

F - INFRASTRUCTURE PLANNING, PROVISION AND FUNDING

99. *The 2011 National Infrastructure Plan defines infrastructure as “the fixed, long-lived structures that facilitate the production of goods and services and underpin many aspects of quality of life. ‘Infrastructure’ refers to physical networks, principally transport, water, energy and communications.*

Comment:

It should be acknowledged that Auckland’s commercial building stock constitutes a major part of Auckland’s infrastructure. The vast majority of NZ businesses are “small businesses” which operates from such premises.

104. *Before making new investment, it is essential that Auckland should get maximum value from its existing assets. Investment in n assets such as water reservoirs or roads can be reduced through pricing, demand management and improvements to the way in which existing infrastructure networks operate.*

Comment:

On the basis that Auckland’s commercial building stock is part of the city’s infrastructure, and in accordance with principles of sustainability, we should “do more with what we have” .

SECTION C: AUCKLAND’S STRATEGIC DIRECTION

107. *Auckland can become the most liveable city by 2040 if we have the courage and determination to implement this Draft Auckland Plan. Being the most liveable city means Auckland will have an outstanding quality of life, economic opportunity and sense of belonging.*

Comment:

The *sense of belonging* that will contribute to our city’s liveability derives from its unique “sense of place”, which undoubtedly derives in part from our built heritage, and provision for that needs to be made in the chart of “Auckland’s Vision” on page 24.

C.3 - PRINCIPLES WE WILL WORK BY TO ACHIEVE THE OUTCOMES

126. *How we go about achieving our vision and outcomes requires a change in behaviour that takes forward the following principles outlined in Box C.1 below.*

Comment:

In relation to **Box C.1 Principles –Be Sustainable**, the intention to “do more with less” is a natural fit with the principles of adaptive re-use of heritage buildings.

2. STRONGLY COMMIT TO ENVIRONMENTAL ACTION AND GREEN GROWTH

133. *This shift requires a fundamentally different approach to the way we grow and develop. More sustainable buildings ...and practices ... must become part of how we do things. It also requires restoring and enhancing our natural environment including improving our biodiversity, quality of our air, land, waters and seas to back up our international brand.*

Comment:

As we grow and develop, the assessment of the sustainability/greenness of building should take into account the embodied energy inherent in our existing building stock. The sustainability of our built environment would be assisted by “restoring and enhancing” valued elements of our built heritage.

4. RADICALLY IMPROVE THE QUALITY OF URBAN LIVING

141. *Auckland has a stunningly beautiful natural environment. By contrast, with notable exceptions, the built environment is a “mixed bag”. There are many examples of poor quality architectural and urban design: poor living places, poor building design, bland streetscapes, lack of green spaces, poor design of public spaces and one of the city’s most beautiful assets, the waterfront, is largely cut off from the city centre.*

Comment:

The “mixed bag” is an understatement. The fact that “the waterfront is largely cut off from the city centre” is both a physical and visual reality. Recently opening up of the Wynyard Quarter and wharves has been a huge success but we need to accord greater importance to views of the harbour as seen from within the city.

C.5 - STRATEGIC DIRECTIONS

149. *Strategic Direction 3 - Integrate arts, culture and heritage into our daily lives” and Strategic Direction 8 - Create a stunning city centre, with well-connected quality towns, villages and neighbourhoods”*

Comment:

The Plan for our built heritage is unclear and the resources required not provided for.

SECTION D: AUCKLAND’S HIGH LEVEL DEVELOPMENT STRATEGY

157. *This direction includes committing to a quality compact city because of:*
- *the existing investment in our inherited settlement patterns*
 - *the additional infrastructure costs associated with dispersed settlements*
 - *the economic benefits of clustering activities*
 - *the burden of travel time and costs and greenhouse gas emissions associated with dispersed development*
 - *the impact on Auckland’s rural and natural environment which is a comparative advantage.*

Comment:

In committing to a “quality compact city”, in part because of “the existing investment in our inherited settlement patterns”, we should be careful to preserve and build on our earlier legacy rather than decimate it and start anew.

190. *Council is committed to a suite of tools to bring about the desired change and ensure delivery is timely and well executed. These include:*
- *amending zonings to allow greater densities to be achieved*
 - *using Council-owned property as a catalyst for change*
 - *working with the private sector in joint ventures*
 - *investigating targeted reductions in development contributions and other financial incentives to stimulate development*
 - *having dedicated cross-council teams to manage consents and a dedicated account manager ensuring cross-council commitment to priorities including the alignment of investment opportunities.*

Comment:

Whilst it is logical to amend the zonings to allow greater densities, it is important that the heritage amenity evident in town centres and enjoyed by local communities should be appropriately protected.

In the absence of heritage incentives, just increasing densities presents a real threat to existing heritage. Incentives are essential in conjunction with reductions in development contributions if such measures are not to result in an increased threat to heritage.

Given that heritage is a matter of national importance, Council's decision making processes would be enhanced by ensuring that heritage considered on that cross-council basis.

CHAPTER 3 AUCKLAND'S ARTS, CULTURE, HERITAGE AND LIFESTYLE

307. *At the broadest level "culture" reflects the shared attitudes, values, goals and practices of a group of people. Our arts, culture, heritage and outdoor lifestyle are central features of Auckland's character and identity and help to attract people to visit and live here. Both indoor and outdoor cultural experiences attract Aucklanders and New Zealanders, who might otherwise go abroad to find them.*

Comment:

We support the statement that "Our arts, culture, heritage ... are central features of Auckland's character and identify and help to attract people to visit and live here." To that end, it is essential that heritage and character are valued and protected.

PRIORITY 3 - ENHANCE AND REVEAL OUR EVOLVING HERITAGE

330. *Our heritage values define who we are, where we have been and inform where we are going. Auckland's built heritage contributes to our sense of belonging, enriches our environment and plays an important role in shaping the character of the neighbourhoods where we live.*

Comment:

We strongly support this statement

331. *... our built and cultural heritage contributes hugely to Auckland's unique character and local identity. It is also part of Auckland's distinctive appeal to visitors and migrants. It is crucial that we value our heritage sites: they are vulnerable and irreplaceable.*

Comment:

We strongly support this statement and re-iterate that *our heritage sites are irreplaceable.*

Map 3.2

Comment:

We note the periods of residential heritage and settlement on Map 3.2. We also note the substantial work undertaken by the former Auckland City Council in its document "Auckland Isthmus Heritage Themes Mapping Oct 2008" which may provide more useful information.

332. *In the context of an increasingly diverse, growing and changing Auckland it is important to respect and preserve our heritage. We will therefore ensure that growth and development do not compromise Auckland's unique heritage aspects.*

Comment:

We agree that Council should "ensure that growth and development do not compromise Auckland's unique heritage aspects". If this our strategic direction, Council must ensure that areas identified for growth and development have adequately identified existing heritage features and should, in accordance with Local Government (Auckland Council) Act 2009 specify the policies and resources to be provided to implement the strategic direction.

333. *The Auckland Council will do its part and lead by example with the heritage resources that it owns and controls. However, many of Auckland’s heritage resources are in private ownership and conservation therefore also relies on the goodwill of individuals and communities.*

Comment:

We applaud the Councils intention to lead by example with its own properties. However, many (and we would suggest *most*) heritage resources are in private ownership. We consider that conservation should not rely solely on the goodwill of private owners. Communities have clearly signalled their expectations of heritage preservation and this has been explicitly acknowledged by the present Mayor.

Council should be further developing the suite of incentives mandated and already provided for in existing district plans. For example, Refer to the present Auckland City District Plan, Central Area Section - 10.2 (Resource Management issues) 10.2.2.1 Building and Objects, 10.3 Resource Management Objectives and Policies 10.3.1 d and e, 10.6 Other Methods, and also Isthmus Section 5C 2.2, 5C3.1. 5C4.2.

Directive 3.7 - Ensure that existing built and cultural heritage appropriately guide area regeneration and new development (page 64)

Comment:

We agree in particular with the need, to (Box 8.4 – point to “appreciate and respect local context – the character, setting and heritage of an area”.

Map 3.3 - Built and cultural heritage: Scheduled items of significance (page 68)

Comment:

Map 3.3 on page 68 which purports to identify Auckland’s built and cultural heritage does not appear to be explained within in the text. The map is populated mainly by dots representing scheduled sites, but it is by no means a definitive list of our *built heritage* since there are numerous items of heritage significance not properly identified at this stage, or not identified at all. Given that legislation *requires* Council to identify particular areas of historic heritage value, Map 3.3 will require significant additional work.

CHAPTER 4 AUCKLAND’S ECONOMY

PRIORITY 5 - DEVELOP A CREATIVE, VIBRANT WORLD CITY

379. *Other sections of this Plan demonstrate that development and growth must occur without compromising the features that make Auckland a desirable place to be.*

Comment:

Being a “*desirable place to be*” requires a *sense of place*, which raises heritage considerations. We need to attract and retain people to live here and set up business. Culture and heritage underpin tourism.

CHAPTER 7 RURAL AUCKLAND

474. ***Directive 7.3 - Identify rural gateways and landmarks that help define Auckland and providing for their permanent protection***

Comment:

We agree and submit that *rural heritage* should be specifically added to this directive and be afforded the same heritage status and protection as stated in **Directive 3.6** (pages 64).

CHAPTER 8 URBAN AUCKLAND

487. *... to radically improve the quality of urban living across Auckland we must build in accordance with best practice urban design principles. (See Box 8.3 and 8.4). These design principles confirm that there are area specific preconditions to achieving a quality compact city. Quality intensification of living patterns requires a much more sophisticated design and development process.*

Specific requirements for quality development include:

- *street and block patterns that provide connectivity*
- *streets and road reserves that work for people, with buildings at proportionate scale that still allow a sense of space*
- *good public transport*
- *respect for the natural features that connect us to Auckland's landscape.*

Comment:

Best practice requires respect for our built heritage as well as our natural heritage

488. *The structure and quality of our built environment, whether it is the buildings, streets or public places, must be as important to Auckland as our natural and rural environment.*

Comment:

If the structure and quality of our built environment is as important to Auckland as our natural and rural environment is, then as *Chapter 5 - Auckland's Environment* suggests, we should all "*share the responsibility for looking after our environment.*" (page 81). This will require that council move finally to develop real and effective incentives to equitably share the costs and benefits arising from looking after our built environment.

489. *Past housing infill within suburban areas, combined with disconnected roading and subdivision patterns, has degraded some parts of the urban environment and prevented opportunities for better development at higher densities. Poor quality design has also blighted parts of the city and, with the legacy of low density development, these have shaped much of Auckland's outer suburbs. Some areas of Auckland suffer from problems such as:*

- *poor public safety*
- *a lack of passenger transport connections*
- *an absence of services within walking distance*
- *a lack of connected and usable public open space*
- *a lack of beauty and civic amenity.*

Comment:

In contrast to Auckland's beautiful natural environment, it is acknowledged that "some areas of Auckland suffer from ... a lack of beauty ". Whilst there is a subjective element to beauty, it is acknowledged throughout the world that historic heritage makes a defining contribution to the attractiveness of our built environment.

491. *Our transition towards a quality/compact city includes a clear and specific policy approach that supports and encourages city intensification through a suite of tools, including:*

- *significant up-zoning of land for medium and high density urban*
- *using council property as a catalyst for change, including the opportunity to develop good examples of quality higher density living*
- *working with private and third party sectors*
- *investigating incentives to encourage intensification*
- *dedicated consent account managers and cross-council assessment teams*

- *the development of an Auckland design compendium by December 2012 to sit alongside the Unitary Plan*
- *ensuring the appropriate infrastructure to support more intensive living is in place*
- *more flexible parking standards for intensive residential and commercial developments.*

Comment:

In pursuit of intensification, Council envisages using such tools as up-zoning and intensification incentives. In view of the principle that local character and heritage should be respected (Box 8.4 p124) it is important that Council should implement the suite of incentives already provided for - Refer to the present Auckland City District Plan, Central Area Section - 10.2 (Resource Management issues) 10.2.2.1 Building and Objects, 10.3 Resource Management Objectives and Policies 10.3.1 d and e, 10.6 Other Methods, and also Isthmus Section 5C 2.2, 5C3.1. 5C4.2.

495. *We ... expect the design of our places to build on and enhance local character, identity and heritage; create a sense of place; and be supported by quality local amenities, accessibility and transport connections. This means we have to consider elements of both public space and parts of the private domain to create the quality outcomes we want.*

Comment:

In creating a sense of place we must acknowledge that public space is primarily space which exists between elements of the private domain. It is therefore imperative to implement policies which provide for the equitable distribution of both benefits and costs of retaining our valued heritage. It is unreasonable to expect individual property owners to shoulder the full burden of retaining heritage buildings they may own privately, for the collective good.

PRIORITY 2 - CREATE ENDURING TOWN CENTRES AND NEIGHBOURHOODS

515. *Auckland has a number of key corridors that provide opportunities for intensification and accommodating future growth within walking distance of the corridor. These corridors will be planned in a way that balances their movement (capacity), place (character) and functions (see Chapter 11).*

Comment:

It appears that Table 8.2 (pg.132) *Urban centres classification* does not adequately recognise the existence of heritage amenity provided by certain town and local centres.

517. *In all cases, a quality, design-led approach is crucial to ensure new development is successfully integrated into the fabric of existing neighbourhoods and/or the surrounding environment*

Comment:

It is desirable that new development is successfully integrated into existing neighbourhoods, and that it should relate to and have cognisance of existing historic heritage.

PRIORITY 3 - DEMAND GOOD DESIGN IN ALL DEVELOPMENT

520. *Box 8.3 - Key Aspects of Design*

Comment:

In “enriching the existing”, the adaptive re-use of existing built heritage needs to be factored into the design process.

Box 8.4 - Strategic Urban Design Principles

Comment:

We support the acknowledgement of the need “to appreciate and respect the local context (the character, heritage and setting of an area)”

CHAPTER 9 - AUCKLAND'S HOUSING

PRIORITY 3 - IMPROVE QUALITY OF EXISTING AND NEW HOUSING

576. *Over half of the housing stock of 2040 already exists in today's houses. Recognising this, we need to retrofit older homes.*

DIRECTIVE 9.3 - Encourage and incentivise retrofitting of existing housing stock, and require new housing to be sited and designed to address best practice urban design and sustainable housing principles.

Comment:

Encouraging and incentivising retrofitting of existing housing stock can be part of the recognising the value of existing built heritage and the opportunity for its adaptive re-use in accordance with the principles of sustainability.

CHAPTER 12 - IMPLEMENTATION FRAMEWORK

While we support many of the Council's aspirations, please refer to our comments made on point 37 in relation to **A.4 - Key Implementation Strategies and Plans**

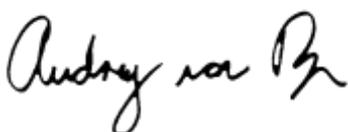
SUMMARY

Civic Trust Auckland commends Council's Draft Auckland Plan for its many positive aspirations. We consider however that in its current Draft form, it is deficient in its provision of a framework for identification and statutory recognition of our built heritage. We also consider the same to be the case for various aspects of the Draft City Centre Masterplan and Draft Waterfront Plan.

Given its RMA status as a matter of national importance, built heritage needs greater emphasis in the Plan. Although it is referred to in Chapter 3, more emphasis is required in Chapter 8, and/or perhaps even its *own* chapter in the Plan.

We would like the opportunity to make an oral submission in support of our written submission.

Yours faithfully,



Audrey van Ryn (Secretary)

On behalf of:

Civic Trust Auckland

Dated: 31 October, 2011