



Submission of Civic Trust Auckland

Long-Term Plan 2012-2022

Name: Audrey van Ryn (Secretary)
Organisation: Civic Trust Auckland
Phone (daytime): 368 1516
Phone (evening): 368 1516
Email: cta@civictrustauckland.org.nz
Postal address: PO Box 74 049 Greenlane, Auckland 1546

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, and made an oral submission on the CCMP on 12 March, 2012.

Our submissions on various points in the Draft Long-Term Plan relate primarily to the matter of historic heritage.

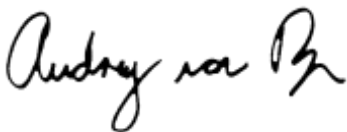
Given its RMA status as a matter of national importance, Civic Trust Auckland consider that in its current Draft form, the LTP is deficient in its provision for historic heritage.

We have presented our submission on Volume 1 of the LTP as a series of extracts from the LTP (in 11pt blue Arial font) with the **points high-lighted in yellow** on which we make comment (in 12pt Arial font).

The numbering in our written submission corresponds directly with the various points as numbered in the Plan.

We would like the opportunity to make an oral submission in support of our written submission on LTP volume 1 and the associated aspects of volumes 2-4.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Audrey van Ryn". The signature is fluid and cursive, with the first name "Audrey" being the most prominent part.

Audrey van Ryn (Secretary)

On behalf of:

Civic Trust Auckland

Dated: 23 March, 2012

Volume One: An overview of the next 10 years

Auckland Council Draft Long Term Plan (2012-2122)

The draft LTP 2012-2022 is what we used to know as the Long Term Council Community Plan (LTCCP). It **provides information about what council expects to do** each year over the next 10 years **to achieve the vision outlined in the draft Auckland Plan.**

This draft LTP 2012-2022 reflects what you have told us **is important to** you and your **communities** through submissions to your previous councils' 10-year plans. It incorporates new initiatives which have come out of consultation on the draft Auckland Plan and local board plans. This draft LTP 2012-2022 is an opportunity for Aucklanders to have input to our planning and also puts in place the processes to enable residents to evaluate our progress against our goals.

Legislation requires all councils to prepare an LTP every three years.

Essentially, this plan is our to-do list

Comment:

The vision outlined in the Auckland Plan appears deficient in its recognition of the importance to communities of heritage, and as a consequence, the LTP has made inadequate provision for heritage

PART I: An overview of our draft Long-term Plan 2012-22

1	Introduction	3
1.1	Message from the Mayor	4
1.2	Message from the Chief Executive	5
1.3	How this draft LTP 2012-2022 is arranged	6
2	Overview of the next 10 years	12
2.1	Auckland today	13
2.2	Auckland tomorrow	15
2.3	Valuing Māori	25
2.4	Our financial strategy	29
2.5	Key issues and topics for your feedback	41

PART II: Supplementary information

3	The Auckland Council	49
3.1	Our structure and people	50
3.2	How to contact the council	71
3.3	Glossary of terms	72
4	Having your say	76
4.1	How to have your say	77
4.2	Submission form	79

PART I: An overview of our draft Long-term Plan 2012-22

LTP Ref:

LTP pg:

1 **Introduction** 3

1.1 **Message from the Mayor** 4

To reach our potential – we need to get a number of key things right, including:

- a world-class transport system that allows Aucklanders to travel around our city
- a productive high-value economy that delivers high-paying jobs
- **a healthy environment that is protected for future generations to enjoy**
- and inclusive and safe communities, based on strong local identities, that are great places to live

Comment: The RMA is concerned with not just the natural environment, but also the physical environment. Auckland’s built/historic heritage is part of the physical environment, and Council is required, as a matter of national importance, to provide for its protection for future generations to enjoy.

An alternative adjective to “*healthy*” is therefore required to encompass the breadth of Council’s environmental responsibilities.

A range of initiatives to help us achieve those goals are in this draft plan. Some of them include:

- substantial investment in transport – both roads and public transport and in particular the City Rail Link
- making Auckland a destination for visitors and new business through a range of initiatives such as more major events,
- the cruise ship terminal, working with education providers and developing the innovation precincts
- **a range of projects focused on both the built and natural environment** supporting local communities through development of town centres, local libraries and recreational facilities

Comment: Beyond investment in transport, and major events, projects within the built environment are largely focussed on new development with little provision for built/historic heritage

1.2 **Message from the Chief Executive** 5

The LTP addresses the big issues of economic growth, transport, community, urban form, and the environment, and how our future plans will be funded.

Funding this plan is beyond the capacity of Auckland Council and its ratepayers alone, and requires a collaborative approach with government and many other stakeholders, including the private sector. It is fair to say the detail around the funding of these big-ticket projects is not complete. There are **multiple potential sources of this funding: council’s normal income from rates** and regulatory fees, returns and dividends on our investments, government funding **and, for some projects, specific targeted rates.**

This plan will set the base for **transforming transport in the Auckland region.** Projects such as the City Rail Link, AMETI Project and the second harbour crossing will help unclog our city, allowing for the free flow of goods and services

and boosting economic activity. The development of the region's economy is absolutely critical to building those healthy communities we all want to live, work and study in. **Auckland Council is committed to doing all it can to create jobs in our region, promote the visitor economy** and develop business precincts and innovation hubs.

What we can achieve when the whole of Auckland pulls together has been, most recently, **highlighted by the** universally acclaimed performance this city put on in hosting **Rugby World Cup 2011**, which has positioned us for other major events going forward. **The priorities we have identified in this document will underpin Auckland becoming a truly global city and a leader in the Asia-Pacific region.**

Comment: The LTP addresses the urban environment and how it will be funded. There is little apparent provision for historic heritage.

1.3 How this draft LTP 2012-2022 is arranged

6

Navigating within the volumes

- A table of contents can be found at the front of each volume along with a description of 'How to read this volume'.
- Volume One contains a **glossary** of terms that covers all four volumes of this plan.
- An **index** is also provided at the back of Volumes One to Three to help you locate key topics.

Comment: The glossary defines the terms: “*natural areas*”, “*natural character*”, and “*natural heritage*”, but provides no definition of built heritage, heritage character or heritage areas

2 Overview of the next 10 years

12

2.1 Auckland today

13

Auckland Council is now responsible for: roads, footpaths and libraries etc
We are also custodians for a stunning, natural environment

Comment: The CCMP suggests Auckland has an “*extraordinary built environment of heritage buildings*”. The LTP should also acknowledge Council's responsibility for Auckland's built heritage/environment.

2.2 Auckland tomorrow

15

2.2.1 The Auckland Plan

16

The draft Auckland Plan ... identified six **significant challenges for Auckland:**

1. **population growth**
2. climate change and energy security
3. economic under-performance
4. social inequality
5. **environmental degradation** - we are not taking as much care of our environment as we need to; the increasing demand for housing, business land and transport infrastructure needs to be managed in a way that sustains the quality of our environment
6. infrastructure

The overarching vision of Auckland as the world's most liveable city is supported by a number of outcomes, transformational shifts and strategic directions.

The seven outcomes describe what Auckland will look like in 2040 and are the basis for the community outcomes used in this LTP 2012-2022. The outcomes are:

1. A fair, safe and healthy Auckland
2. A green Auckland
3. An Auckland of prosperity and opportunity
4. A well connected and accessible Auckland
5. **A beautiful Auckland that is loved by its people**
6. **A culturally rich** and creative **Auckland**
7. Te Hau Te Whenua, Te Hau o Te Tangata – Auckland's Māori identity is its special point of difference as a global city providing opportunities for all.

The five transformational shifts are the key changes required to achieve the outcomes and the Mayor's vision for Auckland. They are:

1. dramatically accelerate the prospects of Auckland's children and young people
2. **strongly commit to environmental action** and green growth
3. move to outstanding public transport within one network
4. **radically improve the quality of urban living**
5. substantially raise living standards for all Aucklanders and focus on those most in need.

The activity chapters in Volume Two of this draft LTP 2012-2022 are aligned to the **11 strategic directions**, which describe more specific areas of focus.

The targets and priorities set under each strategic direction will guide our work programmes in the years to come.

The strategic directions are:

1. Create a strong, inclusive and equitable society that ensures opportunity for all Aucklanders
2. Enable Māori aspirations through recognition of the Treaty of Waitangi and customary rights
3. **Integrate arts, culture, heritage and lifestyle into our daily lives**
4. Acknowledge that nature and people are inseparable
5. Develop an economy that delivers opportunity and prosperity for all Aucklanders and New Zealand
6. Contribute to tackling climate change and increasing energy resilience
7. Keep rural Auckland productive, protected and environmentally sound
8. Create a stunning city centre, with well connected quality towns, villages and neighbourhoods
9. Appropriately house all Aucklanders
10. Plan, deliver and maintain quality infrastructure to make Auckland liveable and resilient
11. Create better connections and accessibility within Auckland, across New Zealand and the world.

Comment: A culturally rich and beautiful Auckland is the closest any stated outcome comes to dealing with Auckland's historic heritage. Transformational shifts or strategic directions appear to directly address historic heritage

2.2.2 Community outcomes

20

What will this draft LTP 2012-2022 deliver against those **outcomes**?

- A **beautiful Auckland** that is loved by its people

The council plays an important role in influencing the shape and quality of urban development, both in the city and throughout our towns and villages.

The **most direct way** we do this is **through the transformational projects** we fund and lead on.

Less directly, we also influence the quality of urban development **through our regulatory function**. The Unitary Plan plays a major role in determining **what kind of development can take place** in specific areas across Auckland.

- A **culturally rich** and creative **Auckland**

Arts and culture are alive and well in Auckland and part of our everyday life.

Comment: **Urban development** is discussed without mention of existing urban fabric. The **beautiful Auckland** the LTP undertakes to deliver is unlikely to provide for historic heritage because:

- the CCMP on which it is based is itself deficient in its provision for historic heritage
- the Unitary Plan, the major determinant of what kind of development can take place, is unlikely to strengthen protection of historic heritage if outcomes in relation to historic heritage are poorly articulated.

Culturally rich relates to the City's cultural events, not its historic heritage.

2.2.3 Transformational shifts

22

- ii. **strongly commit to environmental action** and green growth

Our stunning natural environment is one of the key reasons Auckland ranks so highly on international quality of life surveys, yet the health of our environment is not what it should be. **Our environment has suffered considerable degradation from the pressures of development** and the lifestyles we lead.

Minimising further damage and reversing damage already done will require a fundamental change to the way in which we grow and develop.

More sustainable buildings, infrastructure and practices - such as energy efficiency and waste minimisation. **It also requires restoring and enhancing our natural environment**, including improving our biodiversity, quality of our air, land, waters and seas.

We are proposing a range of initiatives from *Retrofit your home* to improved stormwater infrastructure, significant new investment in public transport options, **protection of our built and natural environments** and new waste minimisation plans.

Comment: The **strong commitment to environmental action** appears primarily concerned with the natural environment. Initiatives for the **protection of our built environment** are minimal.

iv. **radically improve the quality of urban living**

Auckland needs an outstanding urban environment to complement its stunning natural environment. Improving the quality of our urban environment while managing the substantial growth that is forecast will be challenging.

A number of new and existing projects are funded in this draft LTP to address issues such as poor quality architecture and urban design, poor living spaces, poor building design, land streetscapes and lack of green spaces, poor design of public spaces and one of the city's most beautiful assets - the waterfront.

Comment: The LTP's focus on new development apparently ignores the contribution existing built heritage makes to any quality built environment.

2.4 **Our financial strategy**

29

2.4.1 **Summary**

The Auckland Council group is forecasting **capital expenditure of \$20.2 billion** and **operating expenditure of \$38.2 billion** over the next 10 years.

Many of the alternative funding sources being reviewed would require legislative change prior to implementation. However, if the council is able to use such tools, there is significant potential to promote broader community outcomes by shifting the burden of costs in a way that better aligns costs to the beneficiaries, users or exacerbators of the activity.

Comment: Council's financial commitment to historic heritage should be considered in the context of spending plans of **billions** of dollars

2.4.2 **Background and context**

30

The **strategy has been developed balancing the following key principles:**

- funding the Auckland Plan vision, investing to support growth and maintaining service levels
- ratepayer affordability – rates must be affordable for ratepayers now and in the future
- **inter-generational equity** – users should meet the cost of services, including the **benefits received from assets, in the years they are enjoyed**
- financial prudence – council's projected expenditure and revenue and its debt levels must be sufficient to ensure suppliers and investors have confidence in council's ability to meet its financial obligations, while also being flexible enough to be able to respond to changes in the external economic environment
- value for money – minimising the cost of achieving planned service levels.

Comment: Any contribution to the seismic upgrade of earthquake-prone buildings can, on inter-generational grounds, be justifiably apportioned over the long term

2.4.5 **Investing in Auckland**

33

Changes in population and land use

Auckland's **population is forecast to increase by** 16 per cent (**240,000**) from 1.50 million to 1.74 million over the next 10 years. **This implies additional housing needs of about 20 per cent (100,000 dwellings).**

Rates

36

To provide a degree of certainty to ratepayers, the council proposes to limit the average general rate increases ...

It should be noted that these limits apply to the average rates increase; rate increases for individual properties depend on a range of factors (such as property revaluations and the transition to a single rating system) and are not restricted by these limits.

Comment: The valuation of a heritage property should reflect not *only* the unitary plan development potential, increased by intensification and proposed up-zoning. It should also reflect the value of heritage-related (a) limitations on development potential, and (b) requirement for seismic upgrading.

Other funding sourcesContributions

39

Development and financial contributions can only be used to fund the council's cost of capital expenditure to provide for growth. Contributions collected over the next 10 years will fund \$1.9 billion of the projected 10-year growth cost.

Excerpt: Local Government Act 2002

199. Basis on which development contributions may be required

- (1) *Development contributions may be required in relation to developments if the effect of the developments is to require new or additional assets or assets of increased capacity and, as a consequence, the territorial authority incurs capital expenditure to provide appropriately for—*
 - (a) *reserves;*
 - (b) *network infrastructure;*
 - (c) *community infrastructure.*
- (2) *This section does not prevent a territorial authority from requiring a development contribution that is to be used to pay, in full or in part, for capital expenditure already incurred by the territorial authority in anticipation of the development.*
- (3) *In subsection (1), effect includes the cumulative effects that a development may have in combination with another development.*

Comments:

- reserves are capital expenditure items that are purchased to provide open space amenity to mitigate the effects of growth.
- Of equal collective benefit within areas of proposed intensification would be the retention/enhancement of heritage amenity, assuming that historic heritage is an asset.
- Council has suggested that central government make minor legislative changes to even the impact of transition to a single rating system. Equally it might usefully request another minor but useful legislative change that would enable it to better provide for the protection of historic heritage from inappropriate sub-division, use or development, and mitigate for its adverse effects.

- In the absence of direct budgets contributing to seismic upgrade of Auckland’s historic heritage, Council could usefully seek the addition to section 199(1)(a) of the Local Government Act 2002 ... after the word: “reserves” ... the words: “or other forms of communal amenity” .

This would enable development contributions from areas of proposed intensification to cross-subsidise the cost of seismic upgrading of qualifying heritage buildings within those areas.

2.5 Key issues and topics for your feedback 41

2.5.2 Economic Development 43

A **bold approach** is being taken to make Auckland a world-class city that promotes good development, creating opportunities for all Aucklanders. The aim is for an international city centre with many connected towns all operating in a productive high-value economy.

The way we plan the city, provide transport and other essential infrastructure, the events we facilitate and the public spaces that we provide and maintain, all contribute to the desirability of Auckland as a place to live and do business.

Council expenditure in this area is 6 per cent of **operating expenditure (\$2.3 billion over 10 years)** and 3.6 per cent of **capital expenditure (\$735 million over 10 years)**. This expenditure is spread over a range of projects from smaller local initiatives such as upgrades of town centres through to ... Key projects in this plan including:

- **Major events**– additional \$**256**million
- **cruise ship terminal**– an essential part of the infrastructure required for Auckland’s tourism industry – \$**21**million
- **Wynyard quarter**– \$**204**million
- **super yacht re-fit facility** – council contribution \$**17**million (with significant additional funding required from government and the private sector)
- **innovation precincts** – Wynyard quarter: \$**10**million & Tamaki: \$**29**million

Comment: The absence of any reference to historic heritage in the text, or within the \$537 million budget for key economic development projects suggests that Council considers historic heritage has little or no economic benefit.

2.5.4 Urban development and natural environment 45

Much of **council’s day-to-day activity is geared toward shaping and/or protecting Auckland’s built and natural environment. Activities such as planning, resource and building consent processing, heritage protection, environmental monitoring, water supply, sewerage, stormwater and flood protection are all significant in the way Auckland grows and its impact on the natural environment.**

There are some key projects included in this draft LTP 2012-2022 which will influence the future growth of Auckland and others that seek to **rectify existing issues that are either compromising the quality of the environment or impact on individual properties:**

Comment: Council’s activities are geared toward shaping Auckland’s built environment and protecting its natural heritage. Auckland’s legacy of inadequate protection for its historic built heritage remains an issue for Council to rectify

PART II: Supplementary information

3 The Auckland Council 49

3.1.5 Council-controlled organisations (CCOs) 58

Auckland Council Property Limited (ACPL) 60

ACPL is the Auckland Council CCO responsible for managing council's non-service properties (properties not used for council services), ensuring an appropriate return on these assets, and bringing a market perspective to council's planning activities.

Comment: There is a potential and appropriate role for ACPL to assist Council in meeting its responsibilities in relation to protecting historic heritage through pro-active involvement in heritage-related projects

Auckland Tourism, Events and Economic Development Limited (ATEED) 61

ATEED is the Auckland Council CCO responsible for bringing a consistent and integrated region-wide approach to economic development, tourism and major events to help lift Auckland region's economic performance and support it in competing internationally.

Comment: There is a potential and appropriate role for ATEED to assist Council in capitalising on the contribution that historic heritage within the built environment can make to tourism and economic development.

Auckland Transport 62

The organisation's purpose is to contribute to an effective and efficient land transport system to support Auckland's social, economic, environmental and cultural well-being.

It has a number of statutory obligations set out over a variety of different statutes.

Comment: Certain activities of Auckland Transport will be subject to RMA statute. It is therefore appropriate that Auckland Transport be properly informed of any potential effects of its plans upon historic heritage

Waterfront Development Agency Limited (Waterfront Auckland) 63

Waterfront Auckland is the Auckland Council CCO responsible for leading waterfront development consistent with the council's vision.

The objectives of Waterfront Auckland are to deliver a:

- public waterfront: ... a destination that is recognised for its outstanding design and architecture, ... a place where we can express our cultural heritage and history ...

Comment: Waterfront Auckland could commit to recognise existing elements of historic heritage, and their integration within proposed transformation through adaptive re-use