



Civic Trust Auckland feedback on '**Government's new housing rules: what it means for Auckland**'

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1. Civic Trust Auckland (CTA) is a non-profit public interest group formed in 1968 with an interest in matters throughout the greater Auckland region. The aims of the Trust include the protection of natural landforms, the preservation of heritage in all its aspects, and the encouragement of good planning for the city and region.
2. CTA has been a submitter since the 1960's on matters of interest to it, mostly at a local level, but also on national matters occasionally where they affect the Auckland region. CTA made submissions through the amalgamation of seven legacy councils on the formation of Auckland Council, and since then CTA has continued to make submissions on various Council documents including the Auckland Plan (and its subsequent 'refresh'), the Long-Term Plan (and its successive rollovers), and the Unitary Plan (and subsequent plan changes).
3. Auckland Council released its '**Government's new housing rules: what it means for Auckland**' for consultation on 19 April with a three-week consultation period ending 9 May 2022. Consultation addresses various initiatives that Council propose in order to give effect to new Medium Density Residential Standards (MDRS) introduced by Government through the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**the Act**), and the more intense development enabled by Government's National Policy Statement on Urban Design (**NPS-UD**) gazetted in August 2020.
4. When changing the Unitary Plan for the first time to incorporate the MDRS and to give effect to policy 3 of the NPS-UD, the Act requires that Council must notify an Intensification Planning Instrument (IPI) on or before 20 August. and Council's current consultation '**Government's new housing rules: what it means for Auckland**' is effectively Council's Draft IPI.
5. CTA agrees with the logic of intensifying development within walkable catchments. It also agreed with Council's submission to Government on the Act that there was fundamentally no need to create further theoretical capacity beyond the 900, 000 potential development sites available under the existing provisions of the Unitary Plan, which were intentionally and logically planned for around infrastructure provision, including along transport corridors.
6. In spite of Council's logic, the NPS-UD and the MDSR provisions under the Act will nonetheless come into legal effect in August 2022. Without the additional theoretical capacity before the addition of the NPS-UD and the MDRS, SCAs accounted for just 3.6 % of Auckland, and with

the unplanned increase in theoretical capacity, the retention of the existing SCA's will now surely not unduly compromise the development potential of walkable catchments.

7. CTA supports Council's decision to stipulate as a qualifying matter those areas currently identified in the Unitary Plan as Special Character Areas (SCAs). We consider that elements within the existing SCAs already currently meet the threshold sufficient to meet the test of an RMA s.32 analysis in the notified version in August.
8. CTA does not agree with early signs that existing SCA's look to be further diluted and consider that Council should, as a matter of precaution, notify the existing SCA's in their entirety.
9. CTA acknowledges the work done to date by Council's heritage unit that will underpin the IPI process that will ultimately determine the extent of those SCAs. We do not accept the robustness of the methodology used in relation to dissecting the SCAs and consider the methodology should in itself be part of the plan change consulted on in August 2022.
10. Auckland Council's task from Government was not, in the case of Special Character Areas, to verify what Auckland currently had identified. It was to identify qualifying matters which should be a matter qualifying an area to be exempt from the intensification envisaged under the MDRS and NPS-UD. The Unitary process identified that there was unidentified heritage and character outside what ended up falling under the SCA Overlays. CTA therefore expect to see additions to the existing to the existing SCA's on the basis that they were not complete in the 2016 Decision Version of the Unitary Plan
11. CTA thinks the insight of a former Mayor of Auckland speaking (below)on this matter in the magazine of NZ Historic Places Trust is useful in raising the apparently otherwise unconsidered world heritage status of our period native timber cottages here in Auckland

**DICK HUBBARD AUCKLAND**

We must preserve our heritage buildings. They are special and give a city character. Not enough attention has been paid to our character buildings and during the campaign I talked of the "about face" situation where currently you need council permission to renovate a villa but no permission to demolish one.

The heritage policies I found at council have been unsatisfactory.

The new council is already taking action. We're

putting greater emphasis on heritage protection. We will be reviewing and developing heritage protection under the District Plan and developing heritage protection policies. We will explore setting up a heritage fund and look at special character zoning and character overlays under the District Plan. We will be working hard to ensure that Auckland retains its unique position of having the largest number of period wooden villas in the world.



12. CTA notes with interest that Council's Deputy Chair of the Planning Committee acknowledges that intensification in some locations may not result in affordable housing

← Tweet

Jo Bartley  
@jobartleynz

I think with more housing being enabled under the NPS UD there needs to be work alongside this to implement inclusionary zoning because developers will take the chance to build as much as they can but they will make that money from it and won't care for making it affordable

11:41 AM · Apr 29, 2022 from Auckland, New Zealand · Twitter for iPhone

A screenshot of a tweet from Jo Bartley (@jobartleynz). The tweet discusses the need for inclusionary zoning to prevent developers from profiting from increased housing without making it affordable. The tweet includes a timestamp of 11:41 AM on April 29, 2022, from Auckland, New Zealand, using Twitter for iPhone.

13. CTA endorse Jacinda Ardern's position (below) on the matter of heritage and character.

labour.org.nz/council\_must\_build\_on\_heritage\_not\_destroy\_it

 Labour

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## Council must build on heritage, not destroy it

Posted by Jacinda Ardern on July 28, 2016

Auckland Council must move to ensure there are heritage protections in place following recommendations that demolition restrictions be tossed out, Labour's Arts, Culture and Heritage spokesperson Jacinda Ardern says.

The panel considering the Unitary Plan has recommended removing partial protections for neighbourhoods with houses built before 1944.

"This character overlay was a response to a very real problem – the loss of special character buildings. That need hasn't suddenly disappeared.

"Certainly we need to ensure we build both up and out in order to meet the huge demand for housing, but there are ways to do that without losing the character of our communities.

"Our heritage should not be an either/or. We're a young country when it comes to built heritage and we should be doing everything we can to preserve what we have.

"The Council now needs to work with urgency to ensure a solution that safeguards heritage in our communities so that it's not permanently lost," Jacinda Ardern says.

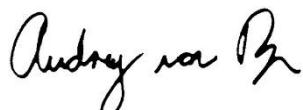
LABOUR   JACINDA ARDERN

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Date of submission: 9 May, 2022

Signature:



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Secretary, Civic Trust Auckland