



Submission of Civic Trust Auckland

Private Plan Change 94 (Wairaka/Te Auaunga Precinct)

Contact name: Mrs Audrey van Ryn (Secretary)
Organisation: Civic Trust Auckland
Phone: 021 0354431
Email: cta@civictrustauckland.org.nz
Postal address: PO Box 29 002 Epsom, Auckland 1344

Civic Trust Auckland (CTA) is a non-profit public interest group, formed in 1968, with activities and interests throughout the greater Auckland region. We are on Auckland Council's list of regional stakeholders.

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.

More good quality and affordable housing is needed in New Zealand to match population growth, and CTA supports government and private housing developments that: engage the public in early consultation, use appropriate locations, use high-quality materials, provide for universal access, respect heritage buildings and landscapes, and are visually pleasing.

We wish to submit on PPC 94 on two areas: trees and built heritage.

1. Trees

(a) More than 2000 trees of a wide range of species used to grow within the Wairaka Precinct, about half of which have already been removed. The value of the remaining trees in the new development is important, for their amenity, ecology, water management, pollution control and visual character. In particular, the trees around Building 48, the Mana Whenua Sanctuary Garden trees and vegetation, and the trees in front of Building 1 are of high value for all Aucklanders, not just for this housing development. Furthermore, in these times of a climate emergency (as declared by both central government and Auckland Council), cutting down any trees must undergo scrutiny. CTA would like to see the remaining mature trees retained, protected, for example, by a covenant, and integrated into the development.

(b) We note that all the trees on this site were formerly protected as part of the education zoning. We submit that an Arboricultural Report be provided to assess the remaining trees against the Notable Trees criteria for scheduling in the Unitary Plan.

(c) We seek that all the significant trees in the Northern Open area be retained, as determined by an independent qualified arborist.

(d) We note that a strong characteristic of the Knoll Open Space is its relationship to the 1896 Building 48, whose heritage values include being used by the School of Architecture and by the Māori Mental Health unit. There is a wide range of both mature native and exotic trees, planted around the time the building was completed: scheduled ginkgo, coral trees, jacaranda, and a rare Japanese tan oak, as well as a grove of large natives including puriri, pohutukawa, totara and rimu. The Open Space Assessment does not mention that the trees in the area relate inherently to the building. In CTA's view, these trees should be retained and protected as part of the educational precinct around Building 48.

(e) The Landscape and Visual Effects Assessment says little about the amenity provided by the existing mature trees, focusing instead on new planting and urban design. From a landscape and visual effects perspective, integration of some of these trees should be considered, not only for the amenity but also for their vital contribution to carbon sequestration.

(f) We note from Council's Further Information Request under RMA cl23(2) that *"rather than providing more open space, as may be expected for the increased population that will be enabled by the proposed plan change, less open space is being committed for that greater population."* CTA submits that the level of intensification and height proposals for this site should be balanced with sufficient open space and trees.

2. Built Heritage

(a) CTA supports the precinct including policies that encourage the retention and adaptation of heritage buildings on the site, including the Former Oakley Hospital Building (Building One), as well as elements identified within the precinct. As we suggest below at (h), more heritage elements could have been and still could be identified, retained, and protected. CTA supports a comprehensive assessment of the whole site in terms of the remaining heritage buildings and other heritage features.

(b) We are disappointed that consent was granted to remove part of the central and eastern wing of Building One to facilitate the new road alignment. We are of the view that a redesign of the road would have meant that this Category A heritage place and Category 1 historic place could be retained in its entirety.

(c) We look forward to the adaptive reuse of Building One, not only retail, but for community activities. Where a new community is being established, community activities should be provided for too, and this new community would ideally be integrated with the current community and its activities and aspirations.

(d) CTA is cautiously optimistic to learn (at 12 in the Assessment of Effects on Historic Heritage) that *"Policies that support the Objectives include requirements that new buildings be designed in a manner that respects existing buildings, provides for amenity, protects heritage values and, where appropriate, enhances the streetscape and gateway locations of the campuses. Similarly, new buildings or additions to existing buildings adjoining or adjacent to scheduled historic heritage places should be sympathetic and provide contemporary and high-quality design which enhances the historic built form."*

(e) We note that the three "landmark" high-rise buildings proposed to be built in close proximity to Building One are assessed as having a minor effect on the historic heritage place. In our view, the current and historically prominent position of Building

One would be compromised. It is an understatement to say (11.5 in the Assessment of Effects on Historic Heritage) that this building “*would remain in the foreground, but would not be the largest structure in the area.*” The Heritage Impact Assessment concludes that new buildings, and particularly those of additional height, will have an impact on the heritage values of the Former Oakley Hospital. It simply makes the observation that “*a juxtaposition of heritage buildings and taller new buildings in close proximity is a characteristic of modern cities and one that can be seen in Auckland CBD*” but provides no conclusion as to what that effect is, whether it is positive, neutral or negative. CTA submits that the new structures planned to be built, particularly the three massive towers, would certainly result in adverse environmental effects upon Building One.

(f) We are opposed to increased heights for the buildings to the south and east of Building One, particularly those to the south, and submit that there should be a transition to greater heights for a more sensitive interface with the heritage building. The Planning Report statement (at pg 32) that “*the land is eminently suitable for intensive medium rise building typologies*” is little more than a subjective statement of opinion. Whilst it goes on to say that “*in terms of land efficiency that height will allow more effective use of this land ...*” insufficient account appears to have been taken of the contribution of heritage to the potential success of the residential development.

(g) The Planning Report states: “*There is one heritage building within the precinct, being the former Oakley Hospital Building.*” That is not strictly correct, and is most likely a nonsense. The fact is that only one of the numerous buildings that made up the extensive medical facility had been properly assessed and included where warranted on Council’s schedule and Heritage New Zealand’s list. Their lack of protection is more a matter of bureaucratic oversight and lack of budget.

(h) The fact that there are no protected or identified heritage buildings within the development site apart from Building One, which has the highest recognition and protection possible, does not mean that these other heritage items cannot be incorporated. Indeed, the Pumphouse and the stone wall will be protected by covenants, which CTA is pleased to observe. We propose that Building 6 and Building 28 (the Mitchell Stout building) should also be considered for protection. CTA submits that if Council were to give proper effect to RMA section 6(f), a comprehensive assessment of the campus would be done, which would quite logically conclude that there is an Historic Heritage Area (as defined in the AUP) with a collection of heritage buildings, and this would be defined with all necessary exclusions to allow planned development without destroying yet more of the city’s dwindling heritage resource.

(i) Notwithstanding the intent of section 6 of RMA is to balance competing matters such as efficient use of resources and heritage, the Planning Report states that RMA S75 (3)(d) requires that a district plan must give effect to any regional policy statement. The Regional Policy Statement states that growth needs to be provided for in a way that maintains and enhances the quality of the built environment, and historic heritage is a key part of that. CTA submits that the Plan Change and this development should deliver much better heritage outcomes and at the very least involve no further ‘partial demolition’ of Building One.

Date of submission: 2 February, 2024

Signature:



A handwritten signature in dark blue ink, reading "Audrey van Ryn". The signature is written in a cursive, flowing style.

Audrey van Ryn
Secretary, Civic Trust Auckland