Response ID ANON-5S8S-2X2H-Q

Submitted to Consultation on Auckland city centre planning provisions
Submitted on 2026-10-16 23:59:12

Submitter details

1 What is your name?

Please provide your first and last name:
Civic Trust Auckland

2 What is your contact email address?

Email:
cta@civictrustauckland.org.nz

3 Are you submitting as an individual or on behalf of an organisation, or on behalf of an iwi authority, group that represents hapū, or other Māori group?

Organisation

4 Where are you, or the organisation you represent based (where you live, work or operate)?

Auckland city centre

General comments on investigation report recommendations

5 Overall, do you support the recommendations in the investigation report?

No

6 Please provide any general comments on the recommendations in the investigation report.

Please write your answer here::

The NPS-UD “is about ensuring New Zealand’s towns are well-functioning urban environments that meet the changing needs of our diverse communities” and to that end Policy 1 of the NPS-UD sets out 6 minimum outcomes for planning decisions.

In considering the Minister’s latest decision to further increase plan enablement, the Insite report references NPS-UD Policy 3(a) which focuses on capacity, and Policy 4 which requires modifications of building heights and densities made under Policy 3 are only made to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area. For the purpose of PC120, Auckland Council has stipulated that RMA s.6 matters of national importance are a ‘qualifying matter’.

Policy 1 of the NPS-UD expressly states the outcomes of a well-functioning urban environments as being a ‘minimum’. In considering what else may be taken into account in achieving the aim of a well-functioning urban environments, it is self-evident that policies are intended to give effect to objectives. The number one objective of the NPS-UD is that “New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.” CTA reiterates (by way of extract from the aforementioned) that number one objective of the NPS-UD is that “New Zealand has well-functioning urban environments that enable all people and communities to provide for their cultural wellbeing now and into the future”.

CTA considers the protection of historic heritage from inappropriate subdivision, use, and development is, in line with RMA s.6(f), a matter of national importance that should be recognised and provided for. As such, the Karangahape Road Historic Heritage Area is recognised in the AUP and provided for as a Qualifying matter for the purpose of PC120. All properties within the area are subject to controls that are intended to manage the effects of new development on the overall heritage values of the area. New development is not prevented within the K'Road HHA. Indeed the controls encourage new development to respond to the heritage values of the area. The Karangahape Road HHA is area based with contributing sites identified. The collective heritage values and cohesiveness of this areas requires new development to be respectful of those values, and removal of non-contributing sites from the currently applicable controls would undermine the overall heritage values of the HHA. As such, CTA supports Option 1 of Point 5.6.3 of Incite's Investigation Report, namely the retention of contributing sites within the Karangahape Road Historic Heritage Area as a baseline.

7 Upload any additional supporting documentation (optional)

Upload documentation:
No file uploaded

Views on specific recommendations for the City Centre Zone (CCZ)

8 What are your views on specific recommendations for the City Centre Zone (CCZ)?

What are your views on specific recommendations for the City Centre Zone (CCZ)? - amend H8.6.2 (general building height) so that building heights are unlimited in the majority of the CCZ, unless otherwise restricted:
Strongly oppose

What are your views on specific recommendations for the City Centre Zone (CCZ)? - remove H8.6.24 (maximum tower dimension and separation standard):
Neutral (neither support nor oppose)

What are your views on specific recommendations for the City Centre Zone (CCZ)? - remove H8.6.24A (east-west tower dimension standard):
Neutral (neither support nor oppose)

What are your views on specific recommendations for the City Centre Zone (CCZ)? - remove building frontage and setback from boundaries requirements in H8.6.25 and H8.6.25A:
Neutral (neither support nor oppose)

9 I/We would like to provide the following feedback on specific recommendations for the City Centre Zone (CCZ).

Please provide any feedback on the recommendation to remove H8.6.24 (maximum tower dimension and separation standard). :

Unlimited building height in sites to the west of Edinburgh Street, particularly around the intersection of Karangahape Road and Ponsonby Road would degrade the area significantly. In particular they would cast considerable shadow along much of Karangahape Road, consequently undermining its physical presence and amenity, and consequently its heritage value and economic potential. CTA opposes the removal of non-contributing sites within the Karangahape Road Historic Heritage Area and consequently opposes all height increases in close proximity to that HHA.

feedback on the recommendation to remove the Central Wharves Precinct site intensity standard (floor area ratio), I202.6.1.8:

Please provide any feedback on the recommendation to remove H8.6.24A (east-west tower dimension standard). :

Please provide any feedback on the recommendation to remove building frontage and setback from boundaries requirements in H8.6.25 and H8.6.25A. :

Views on recommendations for City Centre Precincts

10 What are your views on the recommendation to remove City Centre Precincts?

What are your views on the recommendation to remove City Centre Precincts? - I201 Britomart Precinct site intensity standard (floor area ratio), I201.6.6:
Moderately oppose

What are your views on the recommendation to remove City Centre Precincts? - I202 Central Wharves Precinct site intensity standard (floor area ratio), I202.6.1.8:
Moderately oppose

What are your views on the recommendation to remove City Centre Precincts? - I211 Viaduct Harbour Precinct site intensity standard (floor area ratio), I211.6.5:
Moderately oppose

What are your views on the recommendation to remove City Centre Precincts? - I214 Wynyard Precinct site intensity standard (floor area ratio), I214.6.7:
Moderately oppose

11 I/We would like to provide the following feedback on the proposal to remove City Centre Precincts.

on the recommendation to remove the Britomart Precinct site intensity standard (floor area ratio), I201.6.6. :

Building a high-rise wall at the harbour edge would block views and sunlight from other parts of the city nearby rendering many of those parts unpleasant thus undermining their economic potential, and for that reason it is considered inappropriate. We note with incredulity in compiling this Investigation Report, Incite has failed to avail itself of any urban design advice on this matter.

feedback on the recommendation to remove the Central Wharves Precinct site intensity standard (floor area ratio), I202.6.1.8:

Building a high-rise wall at the harbour edge would block views and sunlight from other parts of the city nearby rendering many of those parts unpleasant thus undermining their economic potential, and for that reason it is considered inappropriate. We note with incredulity in compiling this Investigation Report, Incite has failed to avail itself of any urban design advice on this matter.

feedback on the recommendation to remove the Viaduct Harbour Precinct site intensity standard (floor area ratio), I211.6.5:

Building a high-rise wall at the harbour edge would block views and sunlight from other parts of the city nearby rendering many of those parts unpleasant thus undermining their economic potential, and for that reason it is considered inappropriate. We note with incredulity in compiling this Investigation Report, Incite has failed to avail itself of any urban design advice on this matter.

ffeedback on the recommendation to remove the Wynyard Precinct maximum site intensity standard (floor area ratio), I214.6.7:

Building a high-rise wall at the harbour edge would block views and sunlight from other parts of the city nearby rendering many of those parts unpleasant thus undermining their economic potential, and for that reason it is considered inappropriate. We note with incredulity in compiling this

Investigation Report, Incite has failed to avail itself of any urban design advice on this matter.

Views on recommendations for the Karangahape Road Historic Heritage Area

12 What are your views on the recommendation to remove non-contributing sites from the Karangahape Road Historic Heritage Area?

Strongly oppose the recommendation

13 Provide any feedback on the recommendation to remove non-contributing sites from the Karangahape Road Historic Heritage Area.

provide any feedback on the recommendation to remove non-contributing sites from the Karangahape Road Historic Heritage Area:

The Investigation Report prepared by Incite acknowledges that while 'non-contributing' sites may not make a significant contribution to the heritage values of the HHA, it also concedes that the controls that are in place protect the overall character in streetscape of the area. Notwithstanding the protection of historic heritage from inappropriate subdivision use and development is a matter of national importance that all persons exercising functions and powers under the RMA should recognise and provide for, CTA notes with incredulity that in compiling the report, Incite has failed to avail itself of any heritage advice. Removal of non-contributing sites from the HHA completely undermines the intention of, and the integrity of the HHA. The area requires controls on activities on both contributing and non-contributing sites to ensure that future development in the area respects and enhances the heritage values of the HHA as a whole, and non-contributing sites should be retained within the HHA.

This feedback is to be read in conjunction with the comments in section 6 of this online feedback.

Consent to release your submission

14 Do you consent to your submission being published on this website?

Yes

15 If yes to the above, clearly state if there are parts of your submission that you do not want published.

If yes to the above, clearly state if there are parts of your submission that you do not want published.: