

Feedback on Draft Unitary Plan

from Character Coalition 26/5/13

BACKGROUND

The Character Coalition is an umbrella organisation of 60 historic, heritage and residents' groups in greater Auckland from Warkworth to Franklin. It was formed out of growing concern across the region about the future of our legacy stock of heritage and character buildings - a finite resource that, without specific new protections, will be seriously eroded over time. Members also felt shut out of the decision-making process that determines development in their local environments, a process that seemed designed to disempower ordinary citizens.

As more became known about what was to be proposed in the draft Unitary Plan, especially the scale of the zoning changes across the city, Coalition members researched the ways other cities planned for the protection of their heritage.

The methods used by Brisbane, a close example of a city that had undergone the Super City experience, were used as a model for what Auckland could do to reverse a decades-long pattern of weak protections and major heritage loss.

What happened in Brisbane was the result of one major policy shift, based on a values-driven decision to stop accelerating destruction of its older suburbs – especially the stock of “tin and timber” Queenslander houses responsible for so much of Brisbane’s character.

Brisbane expert Peter Marquis Kyle, brought over by the Council last year, said that while it was a big change in direction for people when introduced, after time it became the accepted way of approaching heritage and is now well-established.

The Coalition has urged the Council to adopt the four main strands of Brisbane’s model:

Demolition Control Precincts – where demolition, removal or alteration of pre-1946 buildings must be publicly notified, and consent is granted only if good reason is shown why they should go; and with a Building Code for appropriate new builds

Local Plans – written after extensive community consultation, reflecting local differences, ensuring development complies with local requirements

Commercial Building Code – which preserves the story of the city’s commercial development by protecting both large and small commercial/industrial premises, corner shops, etc....

Heritage Incentive Scheme – fostering retention by providing relief to owners (rates, grants, free advice, awards, grants from special lottery) for restoration of heritage

properties, encouraging adaptive reuse of properties by relaxing planning requirements, resources for ongoing assessment of the city's legacy stock, and other measures.

FEEDBACK

After reading the relevant draft Plan sections, we offer the comments below as an initial reaction, noting the Council has responded positively to our proposals in part, and bearing in mind that deeper analysis of the Plan's full implications will follow in a formal submission.

We congratulate the Council on its recognition of the need to do something for the region's built character.

The pre-1944 proposal is a major step forward, recognising that buildings outside the traditional inner-city heritage and character suburbs need protection, and that the majority of Auckland region's built legacy needs a new protection mechanism as it cannot meet criteria for rules covering heritage.

We also applaud mentions of sympathetic rebuilding in heritage and character areas, and efforts to protect commercial heritage.

We support the strengthened emphasis on quality and the development of the Auckland Design Manual but urge the Council to make these guidelines mandatory.

We note there is some provision for assistance to heritage property owners but the level of funding for ongoing heritage identification and assessment in budgets so far is token.

We also note proposals to foster heritage retention by easing planning requirements, so buildings can be adapted to a new use.

Our reading of the draft Plan suggests some areas of concern.

Two of the main ones are:

Lack of community consultation prior to drafting the Plan – so many aspects of the Plan reveal its origins i.e a top-down document created in a planning environment, without first doing the groundwork in communities.

Lack of public notification – decisions around historic character are taken out of the public domain with discretionary and restricted discretionary activities (e.g 4.4.3 activity table for demolition/alteration/removal of historic character business).

Public notification of these activities with regard to character and heritage should be a given if the process is to be regarded in any way as transparent.

Other areas of concern -

The pre -1944 overlay provision – recognises protection needs in areas outside established historic character areas, so evaluation can be done and new areas added before development occurs, But:

- costs to owners of applying for consent/evaluation may be too high – Council should make process as simple and cheap as possible so as not to burden property owners
- applications to demolish will not be publicly notified and decisions will be at the discretion of Council staff, leaving out all consultation with immediate neighbours, local boards, local residents, community heritage groups etc...
- doesn't apply to isolated buildings lying outside areas covered by overlay – it remains to be seen how many and what sort of standalone buildings would be left vulnerable e.g. well preserved example of large art deco house near Pukekohe
- language around assessment leaves too much scope for interpretation (e.g. in 3.3.3.2, "appropriately evaluated", buildings with "significant" character values.

Character evaluation – the provisions for historic character areas read well but some terms and descriptions are not adequate to the task of protection:

- language too general in many sections which would decide the fate of many buildings e.g. in Historic Character 4.4.3.2 "significantly adversely affect" character of area, "adversely impact on historic character values" .
- architectural values still given much weight in comparison with the place a building occupies in the "story" of an area, and communities shut out of process whereby they could articulate that value
- with a lot of weight given to grouped buildings and cohesion of similar-era styles, it's not at all clear how character buildings in isolation from each other across the region would be protected.

Demolition by neglect - this is a difficult issue, which needs more exploration to create workable policy:

- in 4.4.3.2 on assessing demolition of a historic business character building, one of the criteria is the "beyond rehabilitation" test, an invitation to owners to make it so.

Vulnerable areas - one of the Plan's most alarming features is that its zones apply some of the biggest changes to many of the original suburbs of the isthmus, home to much of Auckland's heritage and character stock.

- Single House Zone – significant chunks would be classed heritage or character areas but there are glaring omissions e.g immediately behind Mt Eden village
- Where this zone abuts terraced housing/apartment zones, a buffer is needed to prevent major loss of amenity e.g. Angelsea St in Ponsonby, Emmet St in St Mary's Bay, Manukau Rd
- Mixed Housing Zone - potential to do most damage across large tracts of city suburbs put into this category; many character bungalow streets are not in historic character areas, and can't rely on pre-1944 control for protection.
- Best outcomes would be to top up the city's total by shifting some of it to suburbs barely touched by Mixed Housing e.g. Blockhouse Bay and where it joins Mt Roskill, Mangere, Bucklands Beach/Eastern Beach area.
- And, encourage high-quality 2-storey intensive development on larger tracts of land e.g. Haverstock Rd in Sandringham, University land in Epsom. Good examples are Paddington Green development on Balmoral Rd, 14 Fowlds Ave, St Lukes
- Better option than allowing piecemeal, pepper-pot infill developments that would destroy character of city suburbs.

Terraced Housing/Apartment Zone – is an appropriate mechanism for intensification when applied sensitively with regard to landscape and surrounding neighbourhood. But:

- Placement in some areas appears arbitrary and anomalous, lacking regard for community amenity and in some cases where it will do most damage to historic character, if not heritage.
- Here are just a few examples: Poronui St immediately behind Mt Eden Village; Kensington Ave and Marsden Ave (which contains houses with historic designations) in Balmoral; 165 Jervois Rd exceptional quality grand Edwardian home with intact interior which won't survive rezoning to local centre; huge swathe of continuous zoning Royal Oak to Onehunga, a much larger concentration than anywhere else in Auckland.
- Key feature lacking – consultation with communities, done through the Local Boards, who are best placed to work with planners and other stakeholders to work out how and where this type of intensification can be done well.

Commercial Zones - considerable threat to retention of local commercial strips e.g. Karangahape Rd, Kingsland, Dominion Rd, Ponsonby Rd, areas with the best architectural record of Edwardian commercial development which define their locale and tell the story of how they came to be.

- Height designations are mostly 3-4 storeys (depending on heritage overlays) creating incentive to demolish
- Zoning combined with seismic upgrade forced on owners in short timeframe spells doom for continuous blocks of heritage stock, the character of those areas.

More recent character - provision needs to be made for assessment and inclusion of post-war architecture and building e.g. the work of Vernon Brown, Vlad Cacala and others – it has been called in some cities a “recent landmark policy”.

General principles relating to the Plan

Since the draft Plan was launched, the Coalition has realised there is a far broader threat than the particular provisions relating to Auckland’s heritage and character.

The scale and reach of the zoning changes give scope for permanent change to the fabric of Auckland’s built heritage and way of life without adequate upfront consultation.

Top-down Plan with no grassroots consultation - the result is a Plan largely created in isolation from communities, and so it:

- doesn’t take account of the differences that define character of Auckland as a “city of villages” (meeting of Auckland Plan Committee, 3rd July 2012).
- doesn’t reflect the particular make-up, history, needs and issues of communities
- hasn’t included communities in the process to find solutions to Auckland’s problems, missing out on a valuable resource of ideas and local knowledge
- has presented people with a pre-determined model for development – no other possible routes of change are being considered
- has set the ground for feelings of vulnerability and resentment over people’s lack of meaningful involvement in the biggest single change in the city’s history

Loss of detail in the Plan - the desire to simplify what is, admittedly, a daunting amount of regulation from Auckland’s legacy plans has resulted in loss of detail and nuance in the compressing of pages from the old plans into one document.

One size fits all - this simplification has also resulted in a “one size fits all” zoning framework which forces some areas into categories which will strip them of much of their character.

For example, more refinement could be achieved by adding another tier to the hierarchy of centre categories which would allow the region’s small commercial villages, in particular, to

continue to service local communities without losing their character – an established heritage area like Devonport should not be a town centre.

Apparent absence of underpinning research – particularly concerning is the growing realisation that the Plan has been written when basic research on the effects, requirements and economic feasibility to support such major change appears not to have been done e.g. reports on the needs for ancillary facilities (schools, open spaces) which are very expensive and difficult to retrofit in “urban brownfield” areas.

Watercare planning manager Ilze Gotelli has flagged concern over ability to service the Mixed Housing zone covering 49% of Auckland.

What work has been done needs to be made public to make this part of the process more transparent.

Compressed timeframe - the Coalition sees a major problem, especially for the planners, in the unreasonably short timeframe in which the whole Unitary Plan process has been made to happen.

In light of that, the Coalition puts forward the following staged approach from now on, which allows for movement on the housing front while more time is given to sorting out all the concerns mentioned above.

The way forward -

- Proceed with notification of zonings for selected greenfield sites, and large urban brownfield sites where ownership matters are relatively straightforward and infrastructure is up to the type of accelerated development covered by the Council/Government Housing Accord.
- Extend consultation period by several months so planners have time for an evidence-based range of options for a staged development process – the Precinct Planning approach, as is being done in Three Kings now, should be adopted for small townships and urban centres.
- Release the detailed papers on which the current options have been based, including legal input, Auckland Transport and Watercare information on economic and practical feasibility of intensification set out in the Plan.
- Start community consultation now on an agreed, staged series of local plans for intensification based on detailed local input and good design.

- Once agreed, incorporate these plans sequentially into the Plan in a staged manner as Plan Changes.
- Sequence the zoning changes to match population growth and current market demand.
- This would let Council proceed in the meantime with other aspects of the Plan (urban/rural boundary, transport, infrastructure), much of which we believe would have community support if it was evidence-based.
- It is axiomatic that infrastructure assessment work be done before a commitment to a specific intensification proposal, not after.

Auckland 2040 proposals

The Coalition has supported the group's efforts to get the important issues surrounding the Plan out in the open for a better informed debate.

We also share their concerns about the information on which the Plan is based, the speed of the process and the curtailing of people's rights in many areas.

We attach the letter sent to Mayor Len Brown on May 22nd by Auckland 2040 and signed by Coalition chairwoman Sally Hughes as a summary of the positions we support.

Signed –

Sally Hughes etc.....