Auckland Council
Te Kaunihera o Tāmaki Makaurau

Date: Monday, 30 May 2022

Government's new housing rules: what it means for Auckland

Waitemata Local Board

WRITTEN FEEDBACK Vol 9 (6693-7094)

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#6693

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Tania Mace

Name of organisation/business: Grey Lynn Residents Association

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

See attached documentWe believe that Council's method of determining walkable catchments is flawed. It takes no

account of topography, street layout or safety. It's simply been measured as the crow flies.

As anyone will know, you can't just walk down the road and across the motorway, or

through the park at night.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

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Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?**

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?**

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more)

within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

We note with disappointment that this has never occurred. Heritage architect Graeme Burgess and historian Tania Mace are prepared to undertake a survey of some of the streets We note with disappointment that this has never occurred. Heritage architect Graeme Burgess and historian Tania Mace are prepared to undertake a survey of some of the streets

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

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8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

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Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

The stormwater and wastewater infrastructure of Grey Lynn will not cope with the level of residential density that the preliminary response maps show. Planned improvements are based on the existing development capacity, so do not allow for the proposed increase in housing density.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

Qualifying matters must include all current reserves, parks and open space. It is essential that as much public green space as possible is retained in and intensified city to make it liveable, especially as the new MRDS rules will reduce the amount of outdoor space on private sections significantly.

Important privacy information

The personal information that you provide in this form will be held and protected by Auckland Council in accordance with our privacy policy (available at **aucklandcouncil.govt.nz/privacy** and at our libraries and service centres) and

with the Privacy Act 1993. The privacy policy explains how we can use and share your personal information in relation to any interaction you have with the council, and how you can access and correct that information. You should familiarise yourself with this policy before submitting this form.

SUBMISSION ON AUCKLAND COUNCIL'S PRELIMINARY RESPONSE TO NPS-UD AND MDRS – 9 May 2022

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1. **About the Grey Lynn Residents Association**
    a. Grey Lynn Residents Association (GLRA) represents the people of Grey Lynn (including Arch Hill). It does advocacy and activism work to make Grey Lynn the most liveable suburb in the world.
    b. GLRA exists for the following reasons, as stated on its website (https://www.greylynnresidents.org.nz/):
2. To provide a unified voice for the residents of Grey Lynn
3. To promote and protect the interests and welfare of Grey Lynn residents
4. To undertake advocacy and activism work to make Grey Lynn the most liveable suburb in the world
    a. GLRA is an incorporated society and was incorporated in 2013. Membership is open to all and a committee is elected at an AGM each year. GLRA was formed in 2013 largely as the result of widespread community concern about the impact of the then Draft Unitary Plan. Since then, GLRA has engaged across a much wider set of issues, though planning and heritage remain important.
    b. A needs assessment was undertaken by GLRA in 2015, surveying people who live, work, play and/or study in Grey Lynn (https://www.greylynnresidents.org.nz/wp-content/uploads/Grey-Lynn-Needs-Assessment.pdf). There were 516 respondents to the survey, 80% of whom lived in Grey Lynn (with smaller percentages from neighbouring suburbs such as Westmere and Ponsonby) and half of whom had lived in Grey Lynn for more than 10 years.
    c. People were asked what their biggest concerns were in Grey Lynn. These included the effects of intensification, threats to character, traffic and crime.

2. History of Grey Lynn

2. The built environment and open space networks of Grey Lynn define its character. It's a place that is steeped in history. The suburban residential development of Grey Lynn began in the 1860s when parts of Arch Hill were first subdivided into residential sites. Over the other side

of Great North Road lies the vast stretch of land which comprised the Surrey Hills Estate, Auckland's largest Victorian residential subdivision which was progressively developed from 1884. Some other subdivisions in the West Lynn area occurred around the same time, while others followed in the early twentieth century in anticipation of the tram service being extended to the West Lynn area. During the 1920s worker housing was developed on the southern side of in Old Mill Road and in West View Road, the site of the former municipal abattoirs. The residential area on the lower part of Chinaman's Hill followed and was one of the last areas to be developed for residential purposes.

2.2 Many areas of Auckland that, like Grey Lynn were predominantly developed from the 1860s through to the 1920s, are shadows of their former selves. They have been stripped of many of their original houses and no longer exhibit the intact character streetscapes they once had. Grey Lynn is a special place, its homes and open space provide a link to the past that is cherished by its residents.

2.3 Together these elements form the basis of any assessment under the Resource Management Act 1991 (RMA). These characteristics are fully recognised as being the basis for the sustainable management of urban life as defined by Part 2 RMA and in particular Section 5 and Section 6(f).

3. Resource Management (Enabling Housing Supply and other matters) Amendment Act 2021

3.1 Through this Amendment Act, the NPS-UD has been implemented with a series of changes to the RMA to impose the MDRS and intensification policies across Auckland. Importantly, the Amendment Act did not alter the fundamental structure of the RMA, in particular its purpose and the identification of matters of national importance and significance set out in Part 2 RMA remain paramount. The management of these fundamental means of achieving the sustainable management purpose of the RMA has been protected through the ability to identify "Qualifying Matters". This is the open door available to the Council to continue the legacy of protection and stewardship – kaitiakitanga - towards the special character and historic heritage of Auckland as it exists in Grey Lynn as well as many other parts of Auckland. This opportunity must be grabbed firmly to protect a built heritage that, if it is lost, will never be replaced.

3.2 This GLRA submission focuses on the means of using the Qualifying Matters opportunity as the appropriate planning mechanism to protect our heritage suburb remembering that the Amendment Act additions do not supersede the Part 2 purpose of the RMA.

3.3 The importance of retaining and protecting the charming original housing stock of Grey Lynn has been a primary objective of Auckland's planning instruments (legacy district schemes and district plans) for almost 50 years. This planning technique has ensured that additions, alterations, and improvements to existing houses have been given a thorough examination by the Council's heritage team to ensure the compatibility and integration of any new built form. Proactive planning management has provided for, not only the maintenance, but the enhancement and improvement of Grey Lynn's housing stock. This has been a highly successful focus of kaitiatikanga and stewardship.

3.4 However, many Grey Lynners who live outside the Special Character overlay have lovingly restored their original cottages, villas and bungalows, acting as if they were legally required to do so.

3.5 Consequently, since the Residential 1 (now Special Character) areas of Grey Lynn were identified in the early 1990s the character of the houses not covered by the overlay has improved. Extraneous additions from 1970s carports to fake brick cladding have been carefully removed, peeling paint has been stripped, and after much hard labour the original character has been able to shine through just as it did when first built. The restoration of these properties has further reinforced the special character of the area.

3.6 In our feedback to the Draft Unitary Plan and our subsequent submissions to the Proposed Unitary Plan we asked that:

3.7 "The GLRA asks that Council undertake a historic character assessment and field survey of the residential areas of Grey Lynn not currently included in the historic character overlays, to allow the full extent of historic character in Grey Lynn to be identified and protected."

3.8 We note with disappointment that this has never occurred. Heritage architect Graeme Burgess and historian Tania Mace are prepared to undertake a survey of some of the streets

that are outside the Special Character overlay but are highly intact streetscapes of original late nineteenth and early twentieth century dwellings. This will take time so we propose delivering the results of this survey at a later date as an addendum to this submission.

3.9 Housing density and height should be retained as current rules allow within Special Character areas and on Historic Character scheduled properties to enable those special parts of our city to retain their character and open space provisions.

4 RMA Section 6(f) Validation

4.1 GLRA submits that the highly intact special character areas of our suburb fall within the nomenclature of – *Historic Heritage* – and thereby are within the intention of s.6(f) RMA as a matter of national importance. This automatically lifts those properties into the Qualifying Matter definition provided in the Amendment Act.

5 Walkable Catchments

5.1 We believe that Council's method of determining walkable catchments is flawed. It takes no account of topography, street layout or safety. It's simply been measured as the crow flies. As anyone will know, you can't just walk down the road and across the motorway, or through the park at night.

6 Trees

6.1 The upzoning of areas of Grey Lynn that lie outside the Special Character and Historic Heritage overlays into Terrace House and Apartment Zone and Mixed Housing Urban threatens the many unprotected trees that currently grow in suburban gardens. Over the last 150 years, Grey Lynn has gone from a largely barren landscape to a leafy well-established residential suburb where you can hear the beating of kereru (wood pigeon) wings, along with the song of the tui, the chirping of piwakawaka (fantail), and even the occasional haunting call of the ruru (morepork). These and many other species of birds, both native and exotic have made Grey Lynn their home. Grey Lynn's urban forest is threatened by the wholesale upzoning of land beyond the Special Character areas.

6.2 We also note with alarm that the only avenue of protected street trees in Grey Lynn is in Hakanoa Street. The equally splendid London plane trees of Selbourne Street, Browning Street, Francis Street and Castle Street remain unprotected. This should surely be remedied. Furthermore, though Hakanoa and Castle Streets are covered by the Special Character

overlay, only parts of Selbourne and Browning Streets are. We feel sure that the other parts of these tree lined streets would surely qualify for inclusion in the special character overlay. It makes good sense to protect not only the trees, but the charming streetscape of villas and bungalows that stand below their outstretched branches.

7 Infrastructure

7.1 The stormwater and wastewater infrastructure of Grey Lynn will not cope with the level of residential density that the preliminary response maps show. Planned improvements are based on the existing development capacity, so do not allow for the proposed increase in housing density.

7.2 We already have well-known water quality issues in Coxs Bay which is heavily polluted from sewage outflows when rain overloads capacity in the drainage system. We believe this is a considerable constraint on the level of development which Grey Lynn can take without having detrimental effects on the health and wellbeing of our harbour.

8 Opportunities for Intensification

8.1 GLRA supports intelligent intensification that creates liveable new homes without taking away from the liveability of existing homes in the neighbourhood. We consider that there remains ample opportunity for growth in Grey Lynn in the ridgetop high density development zones that are unaffected by Historic Heritage or Special Character on Great North Road. Opportunities for intensification also exist through the Mixed Use Zones located in streets close the Ponsonby Road and Great North Road corner (Maidstone, Pollen, Mackelvie and Scanlan), and opposite in the streets by the corner of Newton Road and Great North Road (Chapman, Burgoyne, Nixon, Burns and Waima). Much of this Mixed Use land has an addition height variation, allowing eight storey buildings with a mix of commercial and residential uses to be built. There is also a substantial block of Mixed Use zoned land, also with additional height variation on Richmond Road where Westmoreland Street West runs through. This land can also be developed with a mix so commercial and residential uses with buildings of 5, 6 and 8 stories permitted.

8.2 GLRA submits that the Special Character protection being sought across Grey Lynn will not adversely affect development capacity overall in the inner-city suburbs of Auckland.

9 Amenity Values

9.1 We understand that Council is required to implement the NPS-UD and MDRS but we feel that the upzoning the vast majority of urban residential land to Mixed Housing Urban and Terrace House and Apartment will not provide the housing choice that Aucklanders want. We want to live in a city where any new development is well-designed, and healthy to live in, with adequate sunlight and places for trees to grow. New developments must also not rob neighbouring residents in existing homes of the sunlight which is so vital to healthy living environments. Council needs to find a way to ensure that neighbourhoods are not destroyed by developments which pay no heed to neighbours' amenity.

10 Parks and Reserves

10.1 Qualifying matters must include all current reserves, parks and open space. It is essential that as much public green space as possible is retained in and intensified city to make it liveable, especially as the new MRDS rules will reduce the amount of outdoor space on private sections significantly.

10.2 Housing density and height should be retained as current rules allow around public open space and not increased, to enable those special parts of our city to retain their character and open space provisions.

11 Conclusion

In summary GLRA submits:

11.1 We support residential and business Special Character being a Qualifying Matter.

11.2 We ask that the existing rules for density and height be retained in Special Character areas, on Historic Heritage sites and on properties a public open space.

11.3 We request that tree cover be a qualifying matter.

11.4 We feel that a more rigorous approach should be taken to the measurement actual walking distances within walkable catchments and the ease and safety of walking the relevant routes. Without this information, the only reasonable choice to make is to request that the walkable catchments are closer than the Council suggests.

11.5 GLRA considers that infrastructure limitations in Grey Lynn form a Qualifying Matter.

10.6 GLRA requests the opportunity to meet with the Heritage Team after GLRA has submitted final plans assessing parts of the areas not already covered by the Special Character overlay.

10.7 GLRA requests that Council considers neighbours amenity values in new developments and that new developments provide healthy living environments with adequate sunlight and places for trees to grow.

10.8 GLRA requests that all current reserves, parks and open space are qualifying matters and that the existing housing density and height adjoining around public open space should be retained as a qualifying matter.

10.9 GLRA remains open to any future consultation and discussion which the Council may wish to initiate.

10.10 GLRA thanks the Council for the opportunity to lodge these submissions for consideration in the preparation of a plan change to implement the Amendment Act and the NPS-UD.

9 May 2022

Address for Service

hello@greylynnresidents.org.nz

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Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Christopher Martin

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

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These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

The calculation of the walkable distance to the CBD as 1.2 km from the designated boundary of the CBD is absurd. What should be at issue is a likely trip from Freemans Bay to the middle of the CBD or the reverse. This might a be a trip to Sky City or more reasonably a trip to the Civic or or work in one of the offices in that area. This would involve in either direction negotiating steep hills and many roads - some very busy - and not something which most people would do on foot and would be very difficult for someone with limited mobility. This is true even of the trip from the designated boundary at Drake Street which walking from there to Wood Street involve a steep climb up College Hill or Franklin Road, or an even steeper climb up Costley Street or through Costlely Park. Such a walk would likely take more than 20 minutes given the time required to wait for traffic crossing signals at the Birdcage and dealing with the considerable volume of traffic in College Hill or Franklin Road. Walking this way occasionally I have the impression that it is relatively little used as a route to the CBD and the choice of walkers is rather to take the longer route along Ponsonby Road and K-Road. I would add that the trip used in the calculation from Drake Street is not one which some people at least would be comfortable about making at night there are areas many non-residential buildings and little possibility of being seen where there are residential properties - in particular on Spring Street.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

The distance from the edge is entirely the wrong way to determine the walkable catchment. The walkable distance should be calculated as the distance someone is likely to make on foot either to the centre of the CBD or to places within the CBD to which a trip might reasonably be made. A decision such as this should not made on the basis of some arbitrary measure but take into account journeys that are likely to be made in real life.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Other

Tell us why

This is more reasonable since it is plausible point at which to begin and end trips. But the calculation must take into account the character of the trip. The steepness and length of hills, the number of road crossings, volume of traffic, character of the area through which the journey might be made at night and during the day.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Tell us why

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

The existing special characters in a very small area something which makes Auckland unique as a city architecturally and were determined only after a very long process of review before being incorporated into the Unitary Plan. Very importantly there seems to be no one who thinks that allowing development in these areas will do anything to increase the stock of affordable housing. It will certainly, however, reduce the amount of tree cover and overall green space in the form of gardens in the central suburbs of the city and impact negatively on Auckland's attempts to address the pressing reality of climate change.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

The area marked in red on the survey in Freemans Bay should be included as a qualifying matter. It contains one of the highest concentrations of Victorian housing in Auckland and so adds immeasurably to the special character of the city. Even limited development in this part of Freemans Bay would destroy the character of the area as a whole. Individual assessments of properties entirely ignores the overall character of streets and areas and this is what the calculation should be based on rather than a numerical assignment to individual houses in which one or two 0s will drag down the whole of the overall streetscape. It is also distressing that improvements which are made to enhance properties and in general to preserve the and make them more livable without detracting from their overall contribution to the heritage streetscape can result in a lowered score.

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Ponsonby Road has plays a very important role in the history of Auckland and it is important to preserve its heritage character. But that character is inextricably linked to that of Freemans Bay as it is to Ponsonby and so the whole area should be considered to have the same historical value.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

For Freemans Bay North there are severe infrastructural restrictions in the form of narrow streets - especially Wood Street and even more so Russell Street which make them difficult for large vehicles to negotiate. Worse increasing the volume of traffic will make them very much more dangerous. There is already a great deal of parking on the pavement forcing pedestrians and in particular puschairs and mobility scooters into the road with the risk of a accident increased by the poor visibility for turning cars.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Important privacy information

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#6697

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: James CLARK

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

None of Saint Marys Bay is within a walkable distance of 1200 metres to City Centre amenities which residents use, including retail, entertainment, and rapid transit or public transport hubs.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The closest rapid transit stop to Saint Marys Bay is Britomart or the future Victoria Street station. Both are NOT within 800 metres of Saint Marys Bay

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

None of Saint Marys Bay suburb is within 400 metres of the City Centre. This means that Saint Marys Bay is beyond the walkable catchment threshold.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Within Saint Marys Bay there are over 200 properties of historic heritage value rated 6 and 5. I support creating Special Character Sub-Areas around clusters of heritage houses in Saint Marys Bay in addition to those identified on the draft maps.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

This technique should be expanded over the entire suburb of Saint Marys Bay collecting all houses of Rating 6, 5 & 4 as sub-areas of special character.

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Saint Marys Bay has significant infrastructure constraints with storm-water, wastewater and the overall road network. The upgrading of the storm-water/wastewater system and the planned separation is based on the existing development capacity. Any increase that is proposed in residential capacity, will not be accommodated in the proposed infrastructure upgrade.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Saint Marys Bay is bounded to the north by an unstable coastal edge which presents a coastal hazard that has not been considered as a qualifying matter as it should have been. This means that a suitable depth of protection is needed from the former coastal cliffs inland for at least 100 metres where intensification must be avoided to manage the hazard risk.

Important privacy information

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#6700

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Maru Ozyurteri

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

None of St Marys Bay is within a walkable distance of 1200 metres to City Centre amenities which residents use. These include retail, entertainment facilities, rapid transit/public transport hubs. The walkable route to the city centre beside the motorway, is only suitable in daylight hours. It has no public lighting and is an unsafe environment. Other return routes from the city centre to St Marys Bay involve steep grades, unsuitable at night for the population cohorts of St Marys Bay.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

The closet rapid transit stop to St Marys Bay is Britomart or the future Victoria Street station. Both are not within 800 metres of St Marys Bay.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The closet rapid transit stop to St Marys Bay is Britomart or the future Victoria Street station. Both are not within 800 metres of St Marys Bay.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Other

Tell us why

None of the St Marys Bay surburb is within 400 metres of the city centre. this means St Marys Bay is beyond the walkable catchment threshold.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Other

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Within St Marys Bay there are over 200 properties of historic heritage value rated 6 and 5. I support creating a Special Character Sub-Areas around clusters of heritage houses in St Marys Bay in addition to those identified on the draft maps.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

The technique should be expanded over the entire suburb of St Marys Bay collecting all houses of Rating 6, 5 and 4 as sub-areas of special character.

8. **What do you think of the proposed business special character areas that we have identified?** Other

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

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We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

St Marys Bay has significant infrastructure constraints with storm water, wastewater and the overall road network. The upgrading of the storm water/wastewater system and the planned

separation is based on the existing development capacity. Any proposed increase in residential density will not be accommodated in the proposed infrastructure upgrading.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

St Marys Bay is bounded by the north by an unstable former coastal edge which presents a coastal hazard that has not been considered as a qualifying matter as it should have been. This means that a suitable depth of protection is needed from the former coastal cliffs inland for at least 100 metres where intensification must be avoided to manage the hazard risk.

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#6702

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Bridget Law

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

I think 15 minutes from the centre of the city is reasonable but it could take 30minutes to just walk across the city within the existing boundary. For example I live in Arch Hill but it would take me 35minutes to walk to work in the CBD (Quay St) this is without considering topography of the city centre.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Other

Tell us why

I don't think the Metropolitan centres identified provide all of the services required to assume residents could only live in their neighbourhood

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Support

Tell us why

Providing the rapid transit is convenient and reliable it will enable residents access to other services

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Other

Tell us why

I don’t think it’s appropriate to apply a blanket rule without considering site specific conditions and effects

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Other

Tell us why

I don’t think it’s appropriate to apply a blanket rule without considering site specific conditions and effects

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government’s direction to enable more housing.

Special Character Areas

‘Special character areas’ are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland’s older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Special character areas are valuable to support identity and diversity of housing typologies in the city. Special character areas are valued not because of one property but the combined quality of a neighbourhood. A blanket rule to enable housing density will allow development of individual sites and dilute the value of any residual character. It is critical that the government recognises special character as a qualifying matter. Appropriate areas of high density housing have already been identified by the unitary plan, a large percentage of this is still undeveloped, surely this should be the priority before permitting the demolition of NZ heritage. Have we not learnt our lesson from the city centre development in the 50s and 60s.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

Large portions of the neighbourhoods are retained whilst permitting higher density on strategic corridors

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this

as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Do not support

Tell us why

Infrastructure constraints require an engineered solution, it is not impossible and should not prevent developers of high density housing.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

The viewshafts are an important planning overlay but should include more flexibility, good architecture could emphasise and celebrate a view shaft.

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#6705

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Scott Caldwell

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be further

Tell us why

The walkable catchment should be 2400 metres (30 minutes) for the City Centre. A Business - Mixed Use Zone should be used instead of a Terrace Housing and Apartment Buildings zone.

In Auckland, many people are willing to walk further than 15 minutes to access jobs, services, opportunities and rapid transit.

Walking is an attractive travel mode within a 30-minute catchment of the city centre, since 30 minutes is a typical commute time for Aucklanders and it avoids the need to pay for parking or pay/ wait for public transport.

We can already see this in 2018 census 'travel to work' data which shows walking mode share above 10% (and often much higher) for these central suburbs.

This larger walkable catchment also better reflects the accessibility of the city centre by cycling/micro-mobility and the bus network, giving a wide range of options for low-emissions travel.

Special Character Area overlays should not compromise the development potential of the Walkable Catchments of the City Centre - this is crucial to enabling More Homes in the Right Places and climate-responsive development.

There is no harm in people choosing to live further from the city centre if they wish - some people may decide may decide that they will tolerate a longer walk, bus, or bike to the city if it's gets them a shorter trip to a local park, beach, shops, school, or friends. It is of no value to stop this occurring.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be further

Tell us why

Walkable catchments should be 1600 metres (20 minutes) for Metropolitan Centres in the isthmus (Newmarket, Sylvia Park), and 800 metres (10 minutes) for other Metropolitan Centres.

In Auckland, many people are willing to walk further than 10 minutes to access jobs, services and opportunities that the metropolitan centres provide.

Household Travel Survey data shows that the median walking commute in Auckland takes around 22 minutes, compared with the median driving commute of 23 minutes. This data covers 2011-2014 and it is likely that driving commutes have lengthened since then, due to development in remote suburbs and greater congestion. Greater walkable catchments for Newmarket and Sylvia Park better reflect the accessibility of these centres by cycling/micro-mobility and the bus network, giving a wide range of options for low-emissions travel. Special Character Area overlays should not compromise the development potential of the Walkable Catchments of the Metropolitan

centres - this is crucial to enabling More Homes in the Right Places and climate-responsive development.

There is no harm in people choosing to live further from the centre if they wish - some people may decide that they will tolerate a longer walk, bus, or bike to the centre if it's gets them a shorter trip to a local park, beach, shops, school, or friends. It is of no value to stop this occurring.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be further

Tell us why

Walkable catchments should be 1600 metres (20 minutes) for Rapid Transit Stops in the isthmus, and 800 metres (10 minutes) elsewhere.

The definition of Rapid Transit in implementing the NPS-UD should include high bus priority areas.

In Auckland, people are often willing to walk further than 10 minutes for rapid transit. Auckland Council research (Wilson, 2013) shows that many rapid transit stops have a walkable catchment larger than 800 metres, and that walking is often the dominant mode up to around 2000 metres. There have been many network improvements since 2013 which will only incentivise walking more.

Furthermore, increased walkable catchments better reflects the cycling and feeder bus catchments of isthmus stations.

Special Character Area overlays should not compromise the development potential of the Walkable Catchments of the rapid transit stops - this is crucial to enabling More Homes in the Right Places and climate-responsive development.

The Business - Mixed Use Zone should be used instead of a Terrace Housing and Apartment Buildings zone, in the first 200 metres of the Walkable Catchment of Rapid Transit stops.

This will support:

The creation of new centres, at stops which aren’t already in Town Centres, and in highly accessible locations on our public transport network;

The development of 15-minute neighbourhoods centred around the rapid transit stop, enabling residents to access daily needs by walking, cycling and micro-mobility and to live lower carbon lifestyles.

There is no harm in people choosing to live further from the rapid transit station if they wish - the inner suburbs are intensely walkable, so some people may decide that they will tolerate a longer walk, bus, or bike to the station if it's gets them a shorter trip to a local park, beach, shops, school, or friends. It is of no value to stop this occurring.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be further

Tell us why

I support upzoning adjacent to town centres.

Upzoning to a distance of 800m - further than currently proposed by Council - should take place around all Town Centres defined by Council as ‘large + high accessibility’, as well as all other town centres on the isthmus.

For town centres on the isthmus, the new zone should facilitate development up to six storeys.

This will support the development of 15-minute neighbourhoods centred around town and local centres, enabling residents to access everyday services and amenities, by walking, cycling and micro-mobility, living lower carbon lifestyles.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be further

Tell us why

I support upzoning adjacent to town and local centres.

Upzoning to a distance of 400m - further than currently proposed by Council - should take place around all other Town Centres (not on the isthmus) which are small but have high accessibility.

Upzoning to a distance of 400m should take place around all Local Centres defined by Council as ‘large + high accessibility’, as well as all other local centres on the isthmus.

For town centres and local centres on the isthmus, the new zone should facilitate development up to six storeys.

This will support the development of 15-minute neighbourhoods centred around town and local centres, enabling residents to access everyday services and amenities, by walking, cycling and micro-mobility, living lower carbon lifestyles.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

Special Character Area overlay should not compromise or limit development in Walkable Catchments I support protection of listed Heritage, and high quality, continuous SCA outside of Walkable catchments With the climate emergency, Auckland Council needs to enable More

Homes in the Right Places. Special Character overlays in central suburbs - the areas with the greatest access to transport and existing amenities - are significantly limiting sustainable housing development and low emission neighbourhoods.

An outline of a better approach: https://www.greaterauckland.org.nz/2022/05/09/protecting-tamaki-makauraus-urban-character/

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

The Special Character Area overlay should not compromise or limit development in Walkable Catchments

I support protection of listed Heritage, and high, quality continuous special character outside of Walkable catchments

With the climate emergency, Auckland Council needs to enable More Homes in the Right Places. Special Character overlays in central suburbs - the areas with the greatest access to transport and existing amenities - are significantly limiting sustainable housing development and low emission neighbourhoods.

Business zones need flexibility to adapt in order to provide for the needs of a growing local population. This includes providing for local shops and services, as well as apartment-style housing above.

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

The Special Character Area overlay should not compromise or limit development in Walkable Catchments

I support protection of listed Heritage, and high, quality continuous special character outside of Walkable catchments

With the climate emergency, Auckland Council needs to enable More Homes in the Right Places. Special Character overlays in central suburbs - the areas with the greatest access to transport and existing amenities - are significantly limiting sustainable housing development and low emission neighbourhoods.

Business zones need flexibility to adapt in order to provide for the needs of a growing local population. This includes providing for local shops and services, as well as apartment-style housing above.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Do not support

Tell us why

It is the responsibility of the NZ Government, Auckland Council and its CCOs to deliver infrastructure in anticipation of future housing growth. It may be reasonable to have extremely limited areas qualified where it is impossible or extremely difficult to address long-term infrastructure constraints.

Wherever there is strong demand to live, and high accessibility, central and local Government agencies should endeavour to address infrastructure constraints to support development.

Intensification in existing urban areas is a more efficient use of infrastructure, compared to greenfield development. Prioritisation of infrastructure funding between greenfield growth and brownfield intensification needs to be considered.

With the climate emergency, investing in infrastructure upgrades to support development in existing urban areas - close to existing amenities and transport - is crucial to reduce transport and housing-related emissions. Auckland Council should minimise and avoid extensive greenfield development requiring new infrastructure in peripheral urban areas, locking-in higher emissions for households.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

I support the protection of the volcanic viewshafts, although work should be completed to adjust them to both enable more development under them (notably given the issues covering the western half of the city centre and Eden Terrace, both places which make a lot of sense to intensify use) and to better protect the Maunga themselves.

Important privacy information

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#6720

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Sandra van Goch

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

The St Marys Bay district is beyond 1200 metres to the city centre amenities such as entertainment venues, retail outlets, main transport hubs, restaurants and the like. The walkable route to the City Centre beside the motorway, is only suitable in daylight hours. It has no public lighting and is an unsafe environment. Other return routes from the City Centre to St Marys Bay involve steep grades, unsuitable at night for the population cohorts of St Marys Bay.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

The St Marys Bay district is beyond 800 metres to the city centre amenities such as entertainment venues, retail outlets, main transport hubs, restaurants and the like. The walkable route to the City Centre beside the motorway, is only suitable in daylight hours. It has no public lighting and is an unsafe environment. Other return routes from the City Centre to St Marys Bay involve steep grades, unsuitable at night for the population cohorts of St Marys Bay.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The closest rapid transit stop to St Marys Bay is Britomart or the future Victoria Street station. Both are not within 800 metres of St Marys Bay.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

None of the St Marys Bay suburb is within 400 metres of the City Centre. This means St Mary's Bay is beyond the walkable catchment threshold.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?**

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

St Marys Bay is a district comprising many historic heritage buildings. These have been preserved with considerable effort and expense over the years and such efforts should not be undermined by any application that increases densification within St Marys Bay without giving full consideration to the Special Character of the district and the likely impact on all properties that have historic heritage of grades 4 through 6.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

This technique should be expanded over the entire suburb of St Marys Bay collecting all houses of Rating 6, 5 & 4 as sub-areas of special character.

8. **What do you think of the proposed business special character areas that we have identified?**

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this

as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

The St Marys Bay district has significant infrastructure constraints with well documented issues with wastewater and storm water separation and systems management. Improvements to the waste and surface water systems already completed, and those in progress, have been based on current population densities. Densification of the residential properties within St Marys Bay will, of course, mean that the current upgrades to the waste and storm water systems will be inadequate to deal with an increased population density. The secondary road system within St Marys Bay are narrow with barely adequate off-road parking and on-street parking at present. Densification would only exacerbate an already significant shortcoming in the key infrastructure of St Marys Bay.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

Important privacy information

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any interaction you have with the council, and how you can access and correct that information. You should familiarise yourself with this policy before submitting this form.

#6723

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Jane Lowe

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

The "edge" of the city centre is a large radius from the actual city centre amenities and commercial district. This has resulted in areas a long distance from the city centre being proposed for THAB development. None of Freeman's Bay is within 1200 metres of the city centre amenities such as retail, entertainment and commercial areas. The distance proposed from the centre of the city is too great.

There are already areas close to the city centre that are more suitable for high density redevelopment than the surrounding character suburbs.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

The Auckland Unitary Plan already allows for an additional 900,000 homes around town centres and transport hubs, in carefully thought through locations. This broad brush approach embodied in the NPS-UD will result in ad hoc unplanned development that will reduce the quality of our communities. We do not need to provide for more development that already provided for in the Unitary Plan. What will become of the Unitary Plan ?

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

There are no rapid transit stops in the Freeman's Bay Area. Intensification around rapid transit stops should be carefully planned taking into account the current and planned community configuration, not a broad brush radius.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city

blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

Town centres may be hard to define. Some are spread along an arterial route and therefore a blanket range of 400 metres could result in very large areas being rezoned THAB. Will they be terrace houses or apartment buildings ? This approach will result in ad hoc buildings emerging with little consideration of how they interact, no provision for community green spaces (a feature of well designed urban centres internationally). How will the proposed approach create liveable communities ?

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be closer

Tell us why

This is a broad brush approach for every local centre. Local centres may be hard to define and therefore a blanket range of 200 metres could result in very large areas being rezoned THAB. Will they be terrace houses or apartment buildings ? This approach will result in ad hoc buildings emerging with little consideration of how they interact, no provision for community green spaces (a feature of well designed urban centres internationally). How will the proposed approach create liveable communities ?

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government’s direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

The Auckland Unitary Plan completed a large body of work identifying special character areas of significance to Auckland history and heritage. Considerable investment has been made by home owners to modernise these homes internally and further preserve this history while providing liveable dwellings. The proposed approach reduces these areas and further tightens the areas protected. This will reduce the heritage value of creating special character areas and risk development which will negatively impact on character in the area. Freeman's Bay represents an important part of the city's history which will be diminished and eventually lost under the current proposal.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

All houses classified 4,5,6 in the Freeman's Bay area are important to the historic character of the area and should be included in the residential special character area. It seems many houses that should have been classified as 5 and 6 have not been.

8. **What do you think of the proposed business special character areas that we have identified?**

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Freeman's Bay is an already intensively developed area with well documented constraints on water, wastewater, stormwater and roading infrastructure. 'Healthy Waters' will make some improvement but existing in ground infrastructure is not designed for broad brush intensive six storey development. Without further planning constraints, apartment blocks would emerge that overload water and wastewater infrastructure, provide streetscapes with no or little sunlight and increases congestion (apartment owners still want a car parked onsite for weekend travel, and there will be no room for visitor parking). If Council wants to intensively develop areas like Freeman's Bay, water and wastewater infrastructure will need to be replaced and roads widened. The current proposal does not allow for this and will not result in liveable communities.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct

- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Climate Change. The current proposal will result in less green space and greater emissions during construction at a time when we are trying to reduce emissions and increase green spaces.

Important privacy information

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#6726

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Chris Clark

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

None of Saint Marys Bay is within a walkable distance of 1200 metres to City Centre amenities which residents use, including retail, entertainment, and rapid transit or public transport hubs.

The walkable route to the City Centre beside the motorway, is only suitable in daylight hours. It has no public lighting and is an unsafe environment. Other return routes from the City Centre to St Marys Bay involve steep grades, unsuitable at night for the population cohorts of St Marys Bay.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The closest rapid transit stop to Saint Marys Bay is Britomart or the future Victoria Street station. Both are NOT within 800 metres of Saint Marys Bay

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

None of Saint Marys Bay suburb is within 400 metres of the City Centre. This means that Saint Marys Bay is beyond the walkable catchment threshold.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Within Saint Marys Bay there are over 200 properties of historic heritage value rated 6 and 5. I support creating Special Character Sub-Areas around clusters of heritage houses in Saint Marys Bay in addition to those identified on the draft maps.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

This technique should be expanded over the entire suburb of Saint Marys Bay collecting all houses of Rating 6, 5 & 4 as sub-areas of special character.

8. **What do you think of the proposed business special character areas that we have identified?**

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Saint Marys Bay has significant infrastructure constraints with storm-water, wastewater and the overall road network. The upgrading of the storm-water/wastewater system and the planned separation is based on the existing development capacity. Any increase that is proposed in residential capacity, will not be accommodated in the proposed infrastructure upgrade.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Saint Marys Bay is bounded to the north by an unstable coastal edge which presents a coastal hazard that has not been considered as a qualifying matter as it should have been. This means that a suitable depth of protection is needed from the former coastal cliffs inland for at least 100 metres where intensification must be avoided to manage the hazard risk.

Important privacy information

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#6727

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Marita Hunt

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be further

Tell us why

The walkable catchment should be 2400 metres (30 minutes) fom the city centre. In Auckland, many people already walk this distance - as shown by the 2018 census ‘travel to work’ data which shows walking mode share above 10% (and often much higher) for these central suburbs.I work in the city centre and live a 35 minute walk from my work. I frequently walk to work, as it's an enjoyable part of my day and gives me passive exercise.

A larger walkable catchment also anticipates increased micromobility on bikes and escooters.

Finally, I think special character areas should be removed within this catchment. Special Character Area overlays should not compromise the development potential of the Walkable Catchments of the City Centre - this is crucial to enabling More Homes in the Right Places and climate-responsive development.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be further

Tell us why

For the same reasons as the answer above, these catchments should be double.

Walkable catchments should be 1600 metres (20 minutes) for Metropolitan Centres in the isthmus (Newmarket, Sylvia Park), and 800 metres (10 minutes) for other Metropolitan Centres.

People are comfortable walking more than 10 minutes to get to shops and centres. We should be encouranging people to take short journeys on foot or by bike.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be further

Tell us why

Walkable catchments should be 1600 metres (20 minutes) for Rapid Transit Stops in the isthmus, and 800 metres (10 minutes) elsewhere.

The definition of Rapid Transit in implementing the NPS-UD should include high bus priority areas.

Increased walkable catchments better reflects the cycling and feeder bus catchments of isthmus stations.

The Business - Mixed Use Zone should be used instead of a Terrace Housing and Apartment Buildings zone, in the first 200 metres of the Walkable Catchment of Rapid Transit stops.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be further

Tell us why

I support upzoning adjacent to town centres.

Upzoning to a distance of 800m - further than currently proposed by Council - should take place around all Town Centres defined by Council as ‘large + high accessibility’, as well as all other town centres on the isthmus.

For town centres on the isthmus, the new zone should facilitate development up to six storeys.

This will support the development of 15-minute neighbourhoods centred around town and local centres, enabling residents to access everyday services and amenities, by walking, cycling and micro-mobility, living lower carbon lifestyles.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be further

Tell us why

I support upzoning adjacent to town and local centres.

Upzoning to a distance of 400m - further than currently proposed by Council - should take place around all other Town Centres (not on the isthmus) which are small but have high accessibility.

Upzoning to a distance of 400m should take place around all Local Centres defined by Council as ‘large + high accessibility’, as well as all other local centres on the isthmus.

For town centres and local centres on the isthmus, the new zone should facilitate development up to six storeys.

This will support the development of 15-minute neighbourhoods centred around town and local centres, enabling residents to access everyday services and amenities, by walking, cycling and micro-mobility, living lower carbon lifestyles.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

Special Character Area overlay should not compromise or limit development in Walkable Catchments I support protection of listed Heritage, and high quality, continuous SCA outside of Walkable catchments With the climate emergency, Auckland Council needs to enable More

Homes in the Right Places. Special Character overlays in central suburbs - the areas with the greatest access to transport and existing amenities - are significantly limiting sustainable housing development and low emission neighbourhoods.

I live in a building that is (still(under a special character area - this building is a 1966 earthquake prone fibrolite clad apartment block. It doesn't make sense that special character provisions apply when it should be demolished and replaced with quality new apartments.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

The Special Character Area overlay should not compromise or limit development in Walkable Catchments

I support protection of listed Heritage, and high quality, continuous special character outside of Walkable catchments

With the climate emergency, Auckland Council needs to enable More Homes in the Right Places. Special Character overlays in central suburbs - the areas with the greatest access to transport and existing amenities - are significantly limiting sustainable housing development and low emission neighbourhoods.

Old homes were not built to modern standards of warmth and dryness, nor weather tightness. Replacing older homes and villas with modern apartments will radically improve quality of life for residents, offering warmer, drier and healthier living environments.

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

The Special Character Area overlay should not compromise or limit development in Walkable Catchments

I support protection of listed Heritage, and high, quality continuous special character outside of Walkable catchments

With the climate emergency, Auckland Council needs to enable More Homes in the Right Places. Special Character overlays in central suburbs - the areas with the greatest access to transport and existing amenities - are significantly limiting sustainable housing development and low emission neighbourhoods.

Business zones need flexibility to adapt in order to provide for the needs of a growing local population. This includes providing for local shops and services, as well as apartment-style housing above.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Do not support

Tell us why

It is the responsibility of the NZ Government, Auckland Council and its CCOs to deliver infrastructure in anticipation of future housing growth. It may be reasonable to have extremely limited areas qualified where it is impossible or extremely difficult to address long-term infrastructure constraints.

Wherever there is strong demand to live, and high accessibility, central and local Government agencies should endeavour to address infrastructure constraints to support development.

Intensification in existing urban areas is a more efficient use of infrastructure, compared to greenfield development. Prioritisation of infrastructure funding between greenfield growth and brownfield intensification needs to be considered.

With the climate emergency, investing in infrastructure upgrades to support development in existing urban areas - close to existing amenities and transport - is crucial to reduce transport and housing-related emissions. Auckland Council should minimise and avoid extensive greenfield development requiring new infrastructure in peripheral urban areas, locking-in higher emissions for households.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Further analysis of these other qualifying matters is required by Auckland Council to provide evidence that these Matters meet the legislative threshold to be applied.

The NPS-UD sets out that Qualifying Matters need to have identified Specific Characteristics that makes the level of intensification required by the NPS-UD and MDRS inappropriate in light of the national significance of urban development. Heights and density more restrictive than the NPS-UD catchment or MDRS can only be imposed to the extent that it affects the characteristic in question. Site by site evidence is required for qualifying matters, which includes justifying the extent of the area that it's applied to, as well as the sites that it applies to.

I support the protection of viewshafts of cultural and spiritual significance to mana whenua in Tāmaki Makaurau.

Important privacy information

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#6739

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Georgia Tremeer

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Support

Tell us why

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Support

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Support

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be closer

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I think less areas should be identified as a qualifying matter

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
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- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

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#6740

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Mark Lockhart

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
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These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Support

Tell us why

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Support

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Support

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Support

Tell us why

I support this in principle but heritage building should be protected and there needs to be a way of protecting significant trees

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Other

Tell us why

This is to blunt as a tool. Each small town centre should be assessed on a case by case basis.

Heritage, built and natural character should be taken into account.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

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'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Special character areas that include heritage and natural character and/or significant trees should be preserved. The governments' approach is short sighted and will result in Auckland becoming a city with little to redeem itself. The lack of control of design for buildings, the removal of tree

protection rules is resulting in Auckland becoming an eye sore. Many parts already are. Auckland's visual quality is, and will be even more so, determined by a majority of developers who don't actually care about the quality of our environment or our buildings or natural environment NOT GOOD URBAN DESIGN.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

As above, this is a "broad brush" approach with no effort to understand or preserve our heritage areas.

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I think more areas or parts of areas should be identified as a qualifying matter

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

I have never understood why Auckland keep growing when our infrastructure is inadequate.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Scheduled and significant trees (not on the schedule because Council haven't bothered to add any trees since 2012) should be a qualifying matter. The statistics of tree loss speak for themselves and I believe part of the reason the National the government took away the ability for Council to protect trees was because Council arborists were incompetent at managing the rules. We are now left with a city that has lost and is losing its trees at a shocking rate. Many trees (Khyber Pass Pohutukawa) are removed in the dead of night. The strength of the public's feeling about this tree loss was demonstrated by the protest at Canal Road Avondale. The Council have done nothing to protect trees.

DO SOMETHING !

Important privacy information

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#6742

Government's new housing rules: What it means for Auckland

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Dan Salmon

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Support

Tell us why

I support if listed qualifying matters are enabled.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Support

Tell us why

I support if listed qualifying matters are enabled.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Support

Tell us why

I support if listed qualifying matters are enabled.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Support

Tell us why

I support if listed qualifying matters are enabled.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Support

Tell us why

I support if listed qualifying matters are enabled.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

I support if listed qualifying matters are enabled.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

I support if listed qualifying matters are enabled.

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

I support if listed qualifying matters are enabled.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

I support if listed qualifying matters are enabled.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Qualifying matters must include all current legal tree protection elements in the Unitary Plan so that these trees continue to require consent for removal / pruning under the new rules.

This includes Schedule 10 (Notable Trees), Significant Ecological Areas rules, Riparian Margin rules and rules that protect coastal Pohutukawa. The scope of the Plan Change to enable these changes to the Unitary Plan must also include correction to any identified errors in Schedule 10. The scope of the Plan Change to enable these changes to the Unitary Plan must also include the addition to Schedule 10 of any new nominations for scheduling that have been received by Auckland Council.

The new MDRS housing rules will enable permitted development of all Single House Zone properties with up to 3 new dwellings. This intensification will inevitably encourage the removal of any trees that remain legally unprotected. This will be a disaster for the urban forest and for climate change amelioration, resulting in the permitted removal of many thousands of trees. It is therefore essential that the current (few) legal protections in the Unitary Plan for urban trees on private land are retained and that the opportunity is taken to identify and schedule new qualifying trees that have been nominated. New nominations should be encouraged as part of the plan change process. Qualifying matters must include access to natural light. Qualifying matters must include the Historic Heritage Schedule. The scope of the Plan Change to enable these changes to the Unitary Plan must also include correction to any identified errors in the Historic Heritage Schedule. The scope of the Plan Change to enable these changes to the Unitary Plan must also include the addition to the Historic Heritage Schedule of any new nominations for scheduling that have been received by Auckland Council. Qualifying matters must include all current Historic Character areas in the Unitary Plan. The scope of the Plan Change to enable these changes to the Unitary Plan must also include correction to any identified errors in the Historic Character areas. The scope of the Plan Change to enable these changes to the Unitary Plan must also include the addition to the Historic Character areas of any new nominations for Historic Character areas that have been received by Auckland Council. Qualifying matters must include all current reserves, parks and open space. It is essential that as much public green space as possible is retained in an intensified city to make it liveable, especially as the new MDRS rules will reduce the amount of outdoor space on private sections significantly. View shafts for the Maunga and other landmarks must be protected as qualifying matters so that current rules regarding building height are retained and not increased in these areas. Housing density and height should be retained as current rules allow within Special Character areas, on Historic Character scheduled properties and around public open space and not increased, to enable those special parts of our city to retain

their character and open space provisions. Overlays such as the Waitākere Ranges Heritage Area must be included as qualifying matters so that intensification and increases in height are prevented in this special area as this would be a breach of the Waitākere Ranges Heritage Area Act. I support the proposed walkable distances of 15 mins (1200m) to the city centre and 10 mins (800m) to metropolitan centres and train / busway stations within which development of up to 6 stories may be enabled, providing that the qualifying matters protections listed above are enabled.

Important privacy information

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#6747

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Tania Mace

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

The walkable catchments take no account of topography, road layout or safety which will vary enormously depending on where you are.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

The walkable catchments take no account of topography, road layout or safety which will vary enormously depending on where you are.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The walkable catchments take no account of topography, road layout or safety which will vary enormously depending on where you are.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be closer

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

There are other additional areas in Grey Lynn which exhibit the same intact character as the existing special character areas - parts of Grey Lynn that are not currently covered by the special character overlay should be assessed for inclusion in the overlay.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

There are other additional areas in Grey Lynn which exhibit the same intact character as the existing special character areas - parts of Grey Lynn that are not currently covered by the special character overlay should be assessed for inclusion in the overlay.

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Sewage overflows are the cause of longstanding pollution in Coxs Bay making it unsafe for swimming. Planned upgrades have not been designed for the massive increase in population that the Preliminary Response maps invite.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

I support the retention of existing controls listed above.

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#6748

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Paul Tingey

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

We already have enough high density housing near the city.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

We already have enough high density housing near the city.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

We already have enough high density housing near the rapid transit stops.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

I do not think we need denser housing of this sort near our town centres.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Other

Tell us why

I do not support any denser housing near our town centres especially in areas that have character housing such as Herne Bay or St Marys Bay. This sort of development would be disproportionate to the needs of the town centre which is relatively small.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Other

Tell us why

I agree that Special Character areas should be included as a Qualifying Matter and that the quality of houses used for this Qualifying Matter should be confirmed as high quality (as per the Council's approach). However I also think the sites identified as they relate to Herne Bay West are not

sufficient as more houses objectively meet the Council's requirements of being grade 5 or grade 6. Specifically Galatea Terrace, Annan Street and parts of Upton Street and Bella Vista Road meet the requirements for high quality character houses using grading data from the Council's survey. I greatly appreciate the work the Council has done over many years in protecting Special Character areas to maintain Auckland's unique heritage character. Whilst intensification is important for the city as a whole I strongly believe we need to protect our character areas which are a small and finite resource at 3.6% of Auckland's housing. Once an area is zoned for intensification, it only takes one development to degrade the huge investment in maintaining the heritage qualities that has been made to neighboring houses over many decades. Once rezoned, all houses in an area will eventually be replaced by higher density housing as it is uneconomic to build and maintain houses to the heritage standards when it is not required. I do not know of any house that was built to the special character requirements by choice rather than necessity. Once these houses are rezoned their character will be lost forever.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

I think the sites identified for Herne Bay West should be extended to include the 12 houses on the southern end of Galatea Terrace (at a minimum) and ideally extended to include the 23 houses spanning from Herne Bay Road to Marine Parade, including Galatea Terrace, as shown on the supporting maps below. As a long term resident of Herne Bay, I greatly appreciate the character rules that have retained and enhanced houses in a consistent way and provided a coherent 1900's character feel to Herne Bay West. In reviewing the current proposal, I believe a significant group of houses have been left out. From Galatea Terrace (south) moving west, there are two blocks of villas and bungalows which are of high Special Character quality and are very well maintained. Using results from the Council's survey findings (for Herne Bay West, Isthmus B, Area 25a), it is easy to show these houses fulfill the Council's requirements for a sub-area by having more than 66% at grade 5 or 6 in a contiguous group. This is significant since at the time of the survey (Jan 2022) sub-areas were required to contain at least 75% of houses graded at 5 or 6, but this was subsequently reduced to 66% as of 31 March 2022 (Ref: Res no. PLA/2022/31). This means the houses I propose should have already been included in the Qualifying Matter if time had permitted. I propose a sub-area with three possible extents: ● Option A: The group of twelve houses on the southern end of Galatea Terrace, from Bella Vista to Upton Road. This area has 75% of houses at grade 5 or 6. (See Option A in the maps below. I have also included some photos of these houses) ● Option B: Extending this area further, the two complete blocks on either side of Galatea Terrace (south), including the relevant houses on Bella Vista Road and Upton Road. In this area of 19 houses, 68% were graded at 5 or 6. (See Option B in the maps below). The eastern side of this area abuts the heritage houses in Herne Bay road which are of a similar nature and period. ● Option C: Extending Option B further west, by adding the four houses on the western side of Annan Street which extends the area to Marine Parade. This area of 23 houses has 70% at grade 5 or 6. (See Option C in maps below) Option C is my preference as it retains the largest number of high quality character houses. See Table 1 below for the supporting calculations. In addition, most of the houses in these areas have been recently renovated to the rules for special

character areas, and have had the investment needed to ensure they will continue to exist as special character housing for the next 100 years. This cannot be said for many other character houses in Auckland which have not had that investment made.The houses I propose are consistent in style and age with those in Herne Bay Road and Masons Ave which are adjacent and contiguous with this group. If we combine the proposed sub-area with these connected streets the resulting area would provide contiguous high quality character housing across five blocks with no breaks. This would enhance the overall character of the area even more.

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

In Herne Bay, our century old wastewater and stormwater system is combined and not capable of supporting intensification. The infrastructure is not scheduled to be fixed for many years and already results in regular discharges of raw sewage to our beaches. More houses and greater site coverage will increase the volume in our pipes and therefore sewage overflows to our beaches. The intensification will negatively impact the surrounding marine area and the local beaches given the lack of infrastructure. Intensification should not be allowed until infrastructure upgrades are complete and any intensification should be required to show evidence it will not worsen the current overflow situation.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

I have no comment on these.

Important privacy information

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Supporting Document for Housing Submission

9 May 2022
Paul Tingey,

Note: This document adds maps, photos and tables to my online submission for questions 6,7 and 9. The text is otherwise the same.

Q6 - Special Character as a Qualifying Matter

"What do you think of our proposal to include identified special character areas as a qualifying matter?"

I agree that Special Character areas should be included as a Qualifying Matter and that the quality of houses used for this Qualifying Matter should be confirmed as high quality (as per the Council's approach). However I also think the sites identified as they relate to **Herne Bay West are not sufficient as more houses objectively meet the Council's requirements** of being grade 5 or grade 6. Specifically Galatea Terrace, Annan Street and parts of Upton Street and Bella Vista Road meet the requirements for high quality character houses using grading data from the Council's survey.

I greatly appreciate the work the Council has done over many years in protecting Special Character areas to maintain Auckland's unique heritage character. Whilst intensification is important for the city as a whole I strongly believe we need to protect our character areas which are a small and finite resource at 3.6% of Auckland's housing. Once an area is zoned for intensification, it only takes one development to degrade the huge investment in maintaining the heritage qualities that has been made to neighboring houses over many decades. Once rezoned, all houses in an area will eventually be replaced by higher density housing as it is uneconomic to build and maintain houses to the heritage standards when it is not required. I do not know of any house that was built to the special character requirements by choice rather than necessity. Once these houses are rezoned their character will be lost forever.

Q7 - Special Character Designations

"What do you think of the proposed residential special character areas that we have identified?"

I think the sites identified for Herne Bay West should be extended to include the 12 houses on the southern end of Galatea Terrace (at a minimum) and ideally extended to include the 23 houses spanning from Herne Bay Road to Marine Parade, including Galatea Terrace, as shown on the supporting maps below.

As a long term resident of Herne Bay, I greatly appreciate the character rules that have retained and enhanced houses in a consistent way and provided a coherent 1900's character feel to Herne Bay West. In reviewing the current proposal, I believe a significant group of houses have been left out. From Galatea Terrace (south) moving west, there are two blocks of villas and bungalows which are of high Special Character quality and are very well maintained. Using results from the Council's survey findings (for Herne Bay West, Isthmus B, Area 25a), it is easy to show these houses fulfill the Council's requirements for a sub-area by having more than 66% at grade 5 or 6 in a contiguous group. This is significant since at the time of the survey (Jan 2022) sub-areas were required to contain at least 75% of houses graded at 5 or 6, but this was subsequently reduced to 66% as of 31 March 2022 (Ref: Res no. PLA/2022/31). This means the houses I propose should have already been included in the Qualifying Matter if time had permitted.

I propose a sub-area with three possible extents:

- Option A: The group of twelve houses on the southern end of Galatea Terrace, from Bella Vista to Upton Road. This area has **75% of houses at grade 5 or 6**. (See Option A in the maps below. I have also included some photos of these houses)

- Option B: Extending this area further, the two complete blocks on either side of Galatea Terrace (south), including the relevant houses on Bella Vista Road and Upton Road. In this area of 19 houses, **68% were graded at 5 or 6**. (See Option B in the maps below). The eastern side of this area abuts the heritage houses in Herne Bay road which are of a similar nature and period.

- Option C: Extending Option B further west, by adding the four houses on the western side of Annan Street which extends the area to Marine Parade. This area of 23 houses has **70% at grade 5 or 6**. (See Option C in maps below)

Option C is my preference as it retains the largest number of high quality character houses. See Table 1 below for the supporting calculations.

In addition, most of the houses in these areas have been recently renovated to the rules for special character areas, and have had the investment needed to ensure they will continue to exist as special character housing for the next 100 years. This cannot be said for many other character houses in Auckland which have not had that investment made.

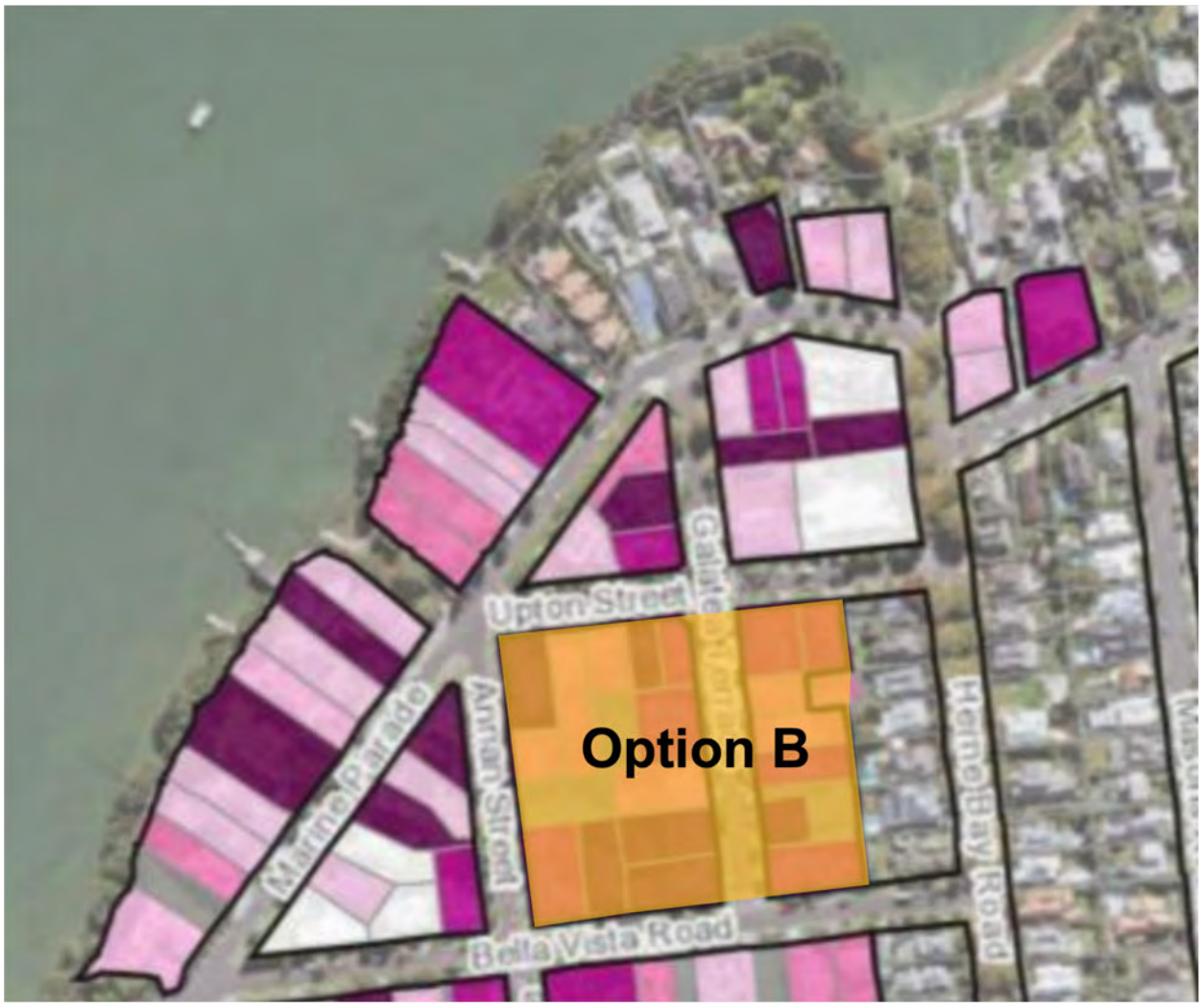
The houses I propose are consistent in style and age with those in Herne Bay Road and Masons Ave which are adjacent and contiguous with this group. If we combine the proposed sub-area with these connected streets the resulting area would provide contiguous high quality

character housing across five blocks with no breaks. This would enhance the overall character of the area even more.

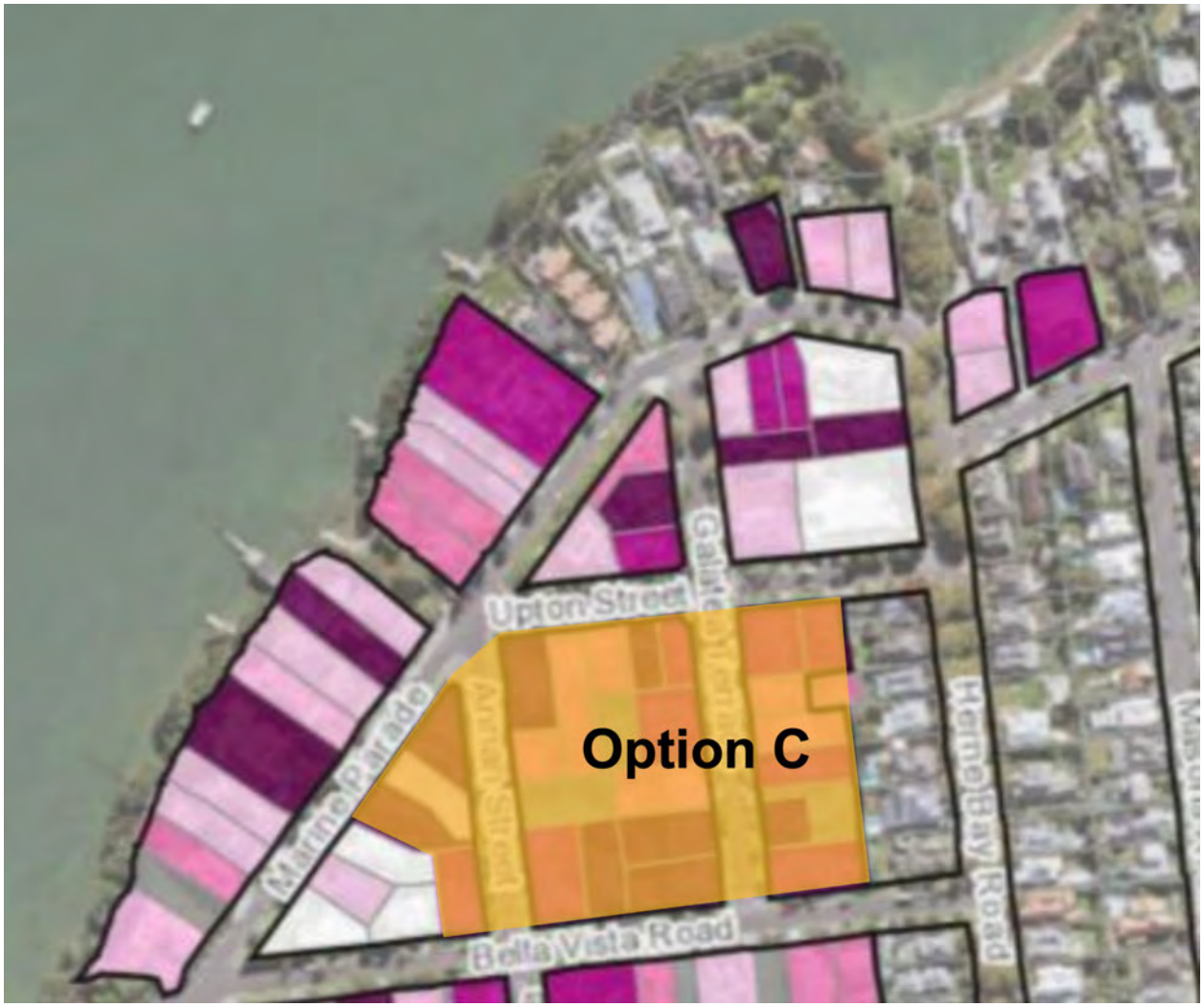
Maps for Sub-Area Options around Galatea Terrace



Map of Option A - subarea of all houses on Galatea Terrace (south)
75% are graded 5 or 6
Supporting calculations are shown in the table below.



Map of Option B: sub-area all all houses in the block on either side of Galatea Terrace (south)
69% are graded 5 or 6



Map of Option C sub-area of all houses from Galatea Terrace (south) to Marine Parade
70% are graded 5 or 6

Q9 - Infrastructure

“What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?”

In Herne Bay, our century old wastewater and stormwater system is combined and not capable of supporting intensification. The infrastructure is not scheduled to be fixed for many years and already results in regular discharges of raw sewage to our beaches. More houses and greater site coverage will increase the volume in our pipes and therefore sewage overflows to our

beaches. The intensification will negatively impact the surrounding marine area and the local beaches given the lack of infrastructure. Intensification should not be allowed until infrastructure upgrades are complete and any intensification should be required to show evidence it will not worsen the current overflow situation.

Table 1 - Sub-area Calculation

	High Quality Houses (5 or 6)	Graded Houses (1 - 6)	High Quality %
Option A. Galatea South Street			
East Street	4	6	66.7%
West Street	5	6	83.3%
Total	9	12	75.0%
Option B. Galatea South Blocks			
East Block	5	7	71.4%
West Block	8	12	66.7%
Total	13	19	68.4%
Option C. Galatea South Blocks and Annan Blocks			
East Block	5	7	71.4%
West Block	8	12	66.7%
Annan Block	3	4	75.0%
Total	16	23	69.6%

Photos of houses in Option A

The following 2 photos show a panorama of 6 villas on the southern end of Galatea Terrace. This is followed by 2 more villas further along.



1, 3, 2 Galatea Terrace



4, 6, 8 Galatea Terrace



7 Galatea Terrace



4 Upton Road (corner Galatea/Upton)

#6750

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Stephanie Cobel

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** I don't know

Tell us why

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** I don't know

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** I don't know

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

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Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** I don't know

Tell us why

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

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#6763

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Anna Tuke

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

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Tell us why

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Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** I don't know

Tell us why

Intensification around town and local centres

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Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

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6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** I don't know

Tell us why

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

I am concerned that the historic heritage features of the villas in Grey Lynn have not been identified as a qualifying matter, particularly on all sides of Grey Lynn park.

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

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9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** I don't know

Tell us why

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

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#6765

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: robin simpson

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

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These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

As a resident of the Freemans Bay area I know exactly what a walkable catchment is for the area.

Based on my own experience I know people will generally only walk from as far as

(Franklin Rd)) to go to the city centre

The proposed outer limit of 1.2 km completely fails to take into account local

topography and road crossings, and also the walking habits of the average

Aucklander.

It is unrealistic to suggest the average Aucklander will walk anything like the distance

and hill climbs/descents involved in a 1.2 km catchment from the Western edge of

the city.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

These issues aren't relevant to my area

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** I don't know

Tell us why

These issues are not relevant to my area

Intensification around town and local centres

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4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** I don't know

Tell us why

These issues aren’t relevant to my area

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

These issues aren’t relevant to my area

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

A great deal of work was put in under the Unitary Plan to identify special character

areas requiring protection.

The amount of land which would be made available for redevelopment by excluding

certain special character areas is very small.

Generally the special character areas which have been excluded have small section

sizes, difficult topography and infrastructure constraints which make them unsuitable

for re development.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

'The areas marked in red in Freemans Bay should be included as a qualifying matter

for the following reasons :

- Even if not high quality character they are part of an historic suburb and contribute

to the retention of Auckland’s history and sense of place

- It is not possible to exclude those areas without adversely affecting the integrity of

the surrounding high quality character areas

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Retaining the history and character of areas such as Ponsonby Road is crucial to the

sense of identity and place for the local community and Auckland as a whole

Infrastructure constraints

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This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

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We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

The existing infrastructure in Freemans Bay will not support intensification due to

limited stormwater/sewage capacity. Freemans Bay will not be linked to the Western

Interceptor and therefore overflows to the harbour will increase

Many of the streets in Freemans Bay present access difficulties for Fire Service

vehicles. High rise buildings present a much greater fire hazard for residents than

low rise and this will put apartment residents at risk.

Its makes environmental and financial sense to prioritise development in other areas

where existing infrastructure permits. Limited resources require existing

infrastructure is put to best use

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Freemans Bay has significant vegetation and green areas which provide

environmental and cooling benefits to the Central City. Intensification will result in a

loss of these benefits at a time when climate change requires their retention.

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#6771

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Aria Newton

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

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Tell us why

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Support

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Support

Tell us why

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Tell us why

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6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I think more areas or parts of areas should be identified as a qualifying matter

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft

- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Important privacy information

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#6781

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Claire Addis

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

None of St Marys Bay is within a walkable distance of 1200 metres to City Centre amenities which residents use. These include retail, entertainment facilities, rapid transit/public transport hubs.

The walkable route to the City Centre beside the motorway, is only suitable in daylight hours. It has no public lighting and is an unsafe environment.

Other return routes from the City Centre to St Marys Bay

involve steep grades, unsuitable at night for the population cohorts of St Marys Bay.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?**

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The closest rapid transit stop to St Marys Bay is Britomart or the future Victoria Street station. Both are not within 800 metres of St Marys Bay.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

None of the St Marys Bay suburb is within 400 metres of the City Centre. This means St Mary's Bay is beyond the walkable catchment threshold.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?**

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Within St Marys Bay there are over 200 properties of historic heritage value rated 6 and 5. I support creating Special Character Sub-Areas around clusters of heritage houses in St Marys Bay in addition to

those identified on the draft maps.

I own 5 Dublin Street, St Marys Bay which was built in 1852. My house, and it's matching 'sister' at number 3, are two of the oldest houses in this suburb, and indeed in Auckland. Their history is supported and maintained by the similar style of villas they are surrounded by, which together reflect the unique and special history of this area and New Zealand.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

This technique should be expanded over the entire suburb of St Marys Bay collecting all houses of Rating 6, 5, and 4 as sub-areas of special character.

8. **What do you think of the proposed business special character areas that we have identified?**

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

St Marys Bay has significant infrastructure constraints with stormwater, wastewater and the overall road network.

The upgrading of the stormwater / wastewater system and the planned separation is based on the existing development capacity.

Any proposed increase in residential density will not be accommodated in the proposed infrastructure upgrading.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

St Marys Bay is bounded to the north by an unstable former coastal edge which presents a coastal hazard that has not been considered as a qualifying matter as it should have been.

This means that a suitable depth of protection is needed from the former coastal cliffs inland for at least 100 metres where intensification must be avoided to manage the hazard risk.

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#6786

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Nicky Spencer

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Support

Tell us why

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Support

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Support

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Support

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Support

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

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Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

However some of the areas proposed to be protected by this should be removed and some of those not protected by this matter should be included additionally. The Herne Bay peninsula should not be intensified due to the specific nature of the character buildings found here that are not replicated in any other parts of Auckland here but it is not necessary to protect all of the streets between Jervois Road and Williamson Ave to the east and west of Ponsonby Road.

7. **What do you think of the proposed residential special character areas that we have identified?** Other

Tell us why

However some of the areas proposed to be protected by this should be removed and some of those not protected by this matter should be included additionally.

The Herne Bay peninsula should not be intensified due to the specific nature of the character buildings found here that are not replicated in any other parts of Auckland here.

However some of the Heritage qualifying matter could be removed from other areas, particularly from some of the streets located between Jervois Road and Williamson Ave to the east and west of Ponsonby Road.

When standing back and looking at the proposed intensification map, on the western side of the city the intensification does not start until Herne Bay Peninsula and then all of point Chev. All of the area closer to the city to the east of this is protected for Heritage It is considered there is more value in releasing some of these "heritage homes" closer to the city, Ponsonby and key transport routes" than there is in protecting a large number of the same type of houses. There is grater value in protecting the different type of Grand heritage homes on Herne Bay peninsula, then there is protecting more a great number of the workers cottages on many streets that are identical . (eg the 6 streets Kelmarna to Isington are all protected with the same type of dwelling and the 12 streets that run east to west from Cowan street , Douglas and Brown street to Williamson Ave area also all protected when the character does not very much among these streets . It seems a same to lock such a large area of land so close to the city centre and Ponsonby up from bein able to be intensified We do not need 100s of the same type of houses preserved to remember the architecture of the past.

This is nearly all of the land adjacent to the commercial areas of Ponsonby, Herne Bay and along College Hill. These areas are also close to the city centre and along a main public transport routes to the city center and between metropolitan centers. While it is important to protect some of the Edwardian villa s a 1910 workers cottages located in these areas , it it not considered important to have to protect them all. Some of the workers homes of the past need to be demolished to make way for suitable workers and family accommodation in these convenient locations to provide for the people of today and future generations Protecting such a large area so that future generations understand the heritage of the past is not necessary and is considered to overprioritize the past over the needs of todays generations.

It is suggested that , if sufficient wastewater and stormwater infrastructure exists in the area, that only half of a street proposed to be protected should be. The half near the main transport route should be identified for intensification. This arbitrary "half" could be qualified by identifying any particular collection of homes on a street that are of a high standard or are particularly representative. The remainder of the street and adjoining streets could be redeveloped without a significant loss in heritage value.

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

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We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

I don't think you shod protect views to things. They still exist if you cant see them and you can go and visit them. They are still a key part of the cities heritage and history if you cant see them from quite so many places as you once could

Important privacy information

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#6799

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: K Naftel

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

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We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

Special character areas of Parnell, Freemans Bay St Mary's Bay and Ponsonby will be adversely affected. The character and uniformity over most of these suburb's dwellings is part of Auckland's history and appeal. They are part of the city visual and historic fabric. eg.San Francisco has attractive heritage buildings as an emblem of the city, Napier has built an tourist image around the art deco predominance. Why trash our heritage?

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Support

Tell us why

Apread the clusters of settlement and intensification. Leave the pockets of strong heritage alone.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Support

Tell us why

More thought needs to be given to the less able members who cannot walk that distance. The elderly and differently abled are not able to walk that far and in all weather.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

As long as character protections remain for areas of character and significantly uniform housing style.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Support

Tell us why

As long as character protection remains for areas of significant character and/or uniformity of dwellings such that the introduction of such Terrace housing would not break down that visual continuity and character.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

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6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

As previously stated because the historic character and visual amenity to our city of having these areas remaining largely intact is a city Taonga. They mark us as a city of history and treasures. They are Auckland.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

As above. Not enough protection of historically significant areas of uniform and historic value.

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I think more areas or parts of areas should be identified as a qualifying matter

Tell us why

As above. Not enough protection of areas of historic and reasonably uniform character dwellings.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Do not support

Tell us why

Make the developers provide the infrastructure. Went to Hobsonville point yesterday. Horrible. A farm of people with few amenities for residents outside their nasty boxes. And they are not affordable homes either. These are social experiments that will come back to haunt us all in 15 years. Slums of the future. Letting developers widen a grass verge and call it a park is not ok. Families with young kids perched on a grass strip beside the road?

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

Ridgeline Protection Overlay - support

Auckland War Memorial Museum viewshaft - support

Allowing sunlight into public spaces- support

open space and permeable surface in private dwellings - support

Important privacy information

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#6804

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Che' Mason

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Other

Tell us why

Do not support - There are no dedicated cycle lanes or pedestrian links to the CBD and the college hill terrain makes it unlikely that residents would use these modes of transport to get to the CBD.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** I don't know

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** I don't know

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

The NPS- UD as currently proposed would allow 3 townhouses per site and 50% building coverage within this area.

It is considered that this proposal would have serous detrimental effects to an area with outstanding overall heritage values as well as negative impacts on overall street aesthetics in a currently quality livable area, particularly Galatea Terrace, Upton Street and Bella Vista Road

The area is located over 2km from the Auckland CBD district which is too far to justify location as a reason for intensification.

There are no dedicated cycle lanes or pedestrian links to the CBD and the college hill terrain makes it unlikely that residents would use these modes of transport to get to the CBD.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

Please remove the proposed MDRS zoning from Galatea Terrace, Bella Vista Road and Upton Street. The houses in these streets individually are of a high character and collectively represent a group of large early 1900's villas that are of a high quality which is not represented anywhere else in Auckland. The character of the area, the wide streets and large gardens remain as it was in the early 1900's.

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Herne Bay has a combined sewerage and stormwater system that already results in frequent discharges of raw sewerage to the beaches. The proposed intensification will lead to and increase in sewerage volume and further overload the current infrastructure.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

Important privacy information

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#6809

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Pearl Coelho

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Support

Tell us why

Good city center should have taller buildings

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Support

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?**

Tell us why

Good increase parking structures here

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** I don't know

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Support

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Shouldn't hinder sunlight to special character old houses by building big structures blocking it in

7. **What do you think of the proposed residential special character areas that we have identified?** Other

Tell us why

Cannot see it clearly on the map

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Cannot see it clearly on the map

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

It should be able to support the number of people, not living in filthy areas over populated

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Builds should not block sunlight from neighbors

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#6812

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Laura Drake

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

None of St Marys Bat is within a walkable distance of 1200 metres to the City Centre amenities which residence use. These include retail, entertainment facilities, rapid transit/public transport hubs.

The walkable route to the City Centre beside the motorway is only suitable during daylight hours. It has no public lighting and is an unsafe environment. Other return routes from the City Centre to St Marys Bay involve steep grades, unsuitable at night for the population cohort of St Marys Bay

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The closest rapid transit stop to St Marys Bat is Britomart or the future Victoria St S=station. Both are NOT within 800 metres of St Marys Bay

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?**

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?**

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Within St Marys Bat there are over 200 properties of historic heritage value rated 6 and 5. I support creating Special Character Sub-Areas around clusters of heritage houses in St Marys Bar in addition to those identified on the draft maps

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

This technique should be expanded over the entire suburb of St Marys Bay collecting all houses of Rating 6, 5 and 4 as sub-areas of special character

8. **What do you think of the proposed business special character areas that we have identified?**

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

St Marys Bay has significant infrastructure constraints with stormwater, wastewater and the overall road network. The upgrading of the stormwater/wastewater system and the planned separation is based on the existing development capacity, Any proposed increase in residential density will not be accommodated in the proposed infrastructure upgrading

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

St Marys Bay is bounded to the north by unstable former coastal edge which presents a costal hazard that has not been considered as a qualifying matter as it should have been. This means that a suitable depth of protection is needed from the former coastal cliffs inland for at least 100m where intensification must be avoided to manage the risk.

St Marys Bay is a beautiful, historical and tiny suburb that will lose all character if such density of housing is permitted. It would be devastating to lose the history behind this suburb.

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#6823

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Warwick James

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be further

Tell us why

1200m from the city centre edge, effectively expands the city centre into the heritage suburbs and does not achieve walkability to any city centre destination from Parnell. It merely is walkable to railway lines and The Port. 1200m also brings high denisty to properties at the rear of my house at 12 Glanville Tce. These properties should be part of the neighbouring qualifying matters because 67 St Stephens Ave is owned and used in conjunction with 65 (a qualifying matter). 67 is also an impractical shape for intensification. 69 is three individually occupied units and 71 is a character villa which is of high quality and should be part of the group of qualifying matters from Takutai St to Lichfield Road.

St Stephens Ave itself should be a qualifying matter from Takutai to Crescent Road. Eastern Parnell has character and amenity which has existed for around 100years and to upzone a large portion of this area of mostly single house sites, because it is right at the edge of an arbitrary 1200m distance from the city centre zone edge, is wrong, is without solid and supportable evidence and is not going to create walkability to anywhere meaningful. The walkable catchment should NOT be further from the city, it should be closer to the city as set out in my discussion.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Support

Tell us why

the 800m seems to be more consistent for flat walking and corresponds to the distance around train stations and rapid transit stops. This distance should be looked at carefully for all the centres affected and be massaged to suit the characteristics of each one. The walkable catchment should NOT be further from the city, it should be closer to the city as set out in my discussion.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Support

Tell us why

I support to a degree but the comment above applies. Certain train stations like Parnell have difficult access and 800m is a long walk to this station because of its steep terrain.The walkable catchment should NOT be further from the city, it should be closer to the city as set out in my discussion.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town

centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Support

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Support

Tell us why

The support is qualified by ensuring development of this scale will fit with the scale and function of the centre

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

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Many of Auckland’s older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Auckland's inner city character is dependent on retention of our historic suburbs. A lot of city creep has occurred into these suburbs and development for intensification at their expense will damage the quality and character of Auckland as a place to live and visit.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

the method used to change the nature of well litigated special character areas looks to be questionable as to assumptions being made and suburbs have now been broken into small pockets which may have future vulnerability to change. St Stephens Ave is now a series of pockets which does not acknowledge the quality and character of the Avenue as a whole for the stretch between Takutai St and Point Resolution. The Council should be being more protective of these areas which have just gone through challenges under the Unitary Plan. There are many examples in Parnell where Council proposed changes under this new proposal look ill thought and show lack of understanding of the area.

8. **What do you think of the proposed business special character areas that we have identified?**

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

I think the inner city old suburbs like Parnell have old infrastructure and therefore have constraints on development. In our street, we have had replaced sections of watermain several times over the last year as leaks to different lengths of the main have occurred and finally the entire north side of the street was replaced just recently. Infrastructure should be a qualifying matter and it should be applied to Parnell.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

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- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

support

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#6838

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Bhenjamin Goodsir

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be further

Tell us why

The walkable catchment should be 2400 metres (30 minutes) for the City Centre. A Business - Mixed Use Zone should be used instead of a Terrace Housing and Apartment Buildings zone.

Mix business zones would allow for more economic diversity in the areas and encourage the creation of communities with more local access to shops, food and entertainment.

In my current rental I love that I can walk down to the supermarket on K Road and get coffee at the same time.

Special Character Area overlays should not compromise the development potential of the Walkable Catchments of the City Centre - this is crucial to enabling More Homes in the Right Places and climate-responsive development.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be further

Tell us why

Walkable catchments should be 1600 metres (20 minutes) for Metropolitan Centres in the isthmus (Newmarket, Sylvia Park), and 800 metres (10 minutes) for other Metropolitan Centres.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be further

Tell us why

Walkable catchments should be 1600 metres (20 minutes) for Rapid Transit Stops in the isthmus, and 800 metres (10 minutes) elsewhere.

The definition of Rapid Transit in implementing the NPS-UD should include high bus priority areas.

Special Character Area overlays should not compromise the development potential of the Walkable Catchments of the rapid transit stops - this is crucial to enabling More Homes in the Right Places and climate-responsive development.

The Business - Mixed Use Zone should be used instead of a Terrace Housing and Apartment Buildings zone, in the first 200 metres of the Walkable Catchment of Rapid Transit stops.

This will support:

a) The creation of new centres, at stops which aren’t already in Town Centres, and in highly accessible locations on our public transport network;

b) The development of 15-minute neighbourhoods centred around the rapid transit stop, enabling residents to access daily needs by walking, cycling and micro-mobility and to live lower carbon lifestyles.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be further

Tell us why

I support upzoning adjacent to town centres.

Upzoning to a distance of 800m - further than currently proposed by Council - should take place around all Town Centres defined by Council as ‘large + high accessibility’, as well as all other town centres on the isthmus.

For town centres on the isthmus, the new zone should facilitate development up to six storeys.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be further

Tell us why

I support upzoning adjacent to town and local centres.

Upzoning to a distance of 400m - further than currently proposed by Council - should take place around all other Town Centres (not on the isthmus) which are small but have high accessibility.

Upzoning to a distance of 400m should take place around all Local Centres defined by Council as 'large + high accessibility', as well as all other local centres on the isthmus.

For town centres and local centres on the isthmus, the new zone should facilitate development up to six storeys.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

Special Character Area overlay should not compromise or limit development in Walkable Catchments

I support protection of listed Heritage, and high quality, continuous SCA outside of Walkable catchments

I believe that the special character of a city comes from its people. As a queer person, I feel at home in parts of the city like Karangahape Road because of the community of businesses, residents, artists and visitors that come together to make the area exciting, vibrant and welcolming.

Without taking steps to preserve the special character of our communities by enabling much greater intensification, this will be lost. It is the stories of our people and our communities that are the most important.

For these reasons I do not believe that the character of the housing should be a qualifying matter.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

The Special Character Area overlay should not compromise or limit development in Walkable Catchments

I support protection of listed Heritage, and high quality, continuous special character outside of Walkable catchments

With the climate emergency, Auckland Council needs to enable More Homes in the Right Places. Special Character overlays in central suburbs - the areas with the greatest access to transport and existing amenities - are significantly limiting sustainable housing development and low emission neighbourhoods.

Old homes were not built to modern standards of warmth and dryness, nor weather tightness. Replacing older homes and villas with modern apartments will radically improve quality of life for residents, offering warmer, drier and healthier living environments.

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

The Special Character Area overlay should not compromise or limit development in Walkable Catchments

I support protection of listed Heritage, and high, quality continuous special character outside of Walkable catchments

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Do not support

Tell us why

It is the responsibility of the NZ Government, Auckland Council and its CCOs to deliver infrastructure in anticipation of future housing growth. It may be reasonable to have extremely limited areas qualified where it is impossible or extremely difficult to address long-term infrastructure constraints.

Wherever there is strong demand to live, and high accessibility, central and local Government agencies should endeavour to address infrastructure constraints to support development.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay

- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

I support the protection of viewshafts of cultural and spiritual significance to mana whenua in Tāmaki Makaurau.

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#6839

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Mark Gascoigne

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

I live in St Marys Bay none of which is within a walkable distance of 1200 metres to City Centre amenities which residents use. These include retail, entertainment facilities, rapid transit/public transport hubs. It is about 43 minutes (according to Google Maps) from the west of St Marys Bay to the CBD.

The walkable route to the City Centre beside the motorway, is only suitable in daylight hours. It has no public lighting and is an unsafe environment. I have personally been attacked there and the police took 6 hours to respond despite the main police bas being less that 3 minutes drive away. Other return routes from the City Centre to St Marys Bay involve steep grades, unsuitable at night for the population cohorts of St Marys Bay.

To assume that Victoria Park is part of the CBD is not realistic in a practical sense in that there are very few, shops, offices, transport hubs or civic amenities there. This area is also unsafe after dark so crossing it by foot is not an option for many people.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Support

Tell us why

It make sense to concentrate new urban development close to the major transport hubs but your survey largely missed the point by assuming that everyone will get on to mass transit systems to travel to another place to work. This 1960s concept of "dormitory suburbs" leads to lifeless suburbs and has largely been made redundant by many people working from home now. Your policy (ie the Government's in effect) places no emphasis on pleasant neighbourhoods with good local amenities, trees, parks and other community facilities.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?**

Tell us why

The closest rapid transit stop to St Marys Bay is Britomart or the future Victoria Street station. Both are not within 800 metres of St Marys Bay.

According to Google Maps it is between 36 to 42 minutes walk to Britomart Station form parts of St Marys Bay. Clearly Council calculations are flawed.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

None of the St Marys Bay suburb is within 400 metres of the City Centre. This means St Mary's Bay is beyond the walkable catchment threshold.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Other

Tell us why

Your logic seems flawed. Surely it would make more sense to assess what existing buildings or other town features are worth saving and the character of any particular town before applying a blanket control over the top of whatever is existing. This seems to indicate hey Scorched Earth policy where everything is bulldozed and we start from scratch, perhaps like the evetuka rebuild of Ukraine? We have much worth saving a "1 size fits all approach" is not going to result in better communities.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

While I fully support the notion that we need greater density in many parts of Auckland, I also support the preservation of character areas who are these already provide great places to live. I haven't read your assessment criteria for the character rating of existing buildings this seems very flawed. For example if a building is not immediately visible or has been modified and anyway downgraded. You may have noticed that many houses in historic areas currently being restored as they are so well loved. This means unlike new, high-rise urban areas, the housing stop actually improve with age. Of course this cannot happen if it has been demolished.

Within St Marys Bay there are over 200 properties of historic heritage value rated 6 and 5. I support creating Special Character Sub-Areas around clusters of heritage houses in St Marys Bay in addition to those identified on the draft maps.

I did makes no sense at all to me that if precious Heritage resources are in short supply they should be demolished. Would the same logic apply to kiwi threatened in the wild? If they not comprise 75% of all the birds in a certain area of New Zealand should they be hunted to extinction simply because there were not enough of them? It makes no sense.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

This technique should be expanded over the entire suburb of St Marys Bay collecting all houses of Rating 6, 5 & 4 as sub-areas of special character.

Auckland has some the best Victorian and add Edwardian houses in the world. It makes no sense to demolish them when we have areas of very poor quality housing which could be replaced with better quality buildings. The maths does not work: if we were to intensify Auckland to the maximum amended by yourselves and the government we would simply have too many households for Auckland to the function. We should the preserve the good ones for future generations.

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Like good heritage houses there are a number of great historic commercial buildings. It makes sense to preserve these and develop surrounding areas to increase density by removing vacant lots or poor quality buildings. I have seem many examples around the world off business areas that thrive because they consist of a wonderful mixture of old and new buildings

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

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We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

St Marys Bay has significant infrastructure constraints with stormwater, wastewater and the overall road network. The upgrading of the stormwater/wastewater system and the planned

separation is based on the existing development capacity. Any proposed increase in residential density will not be accommodated in the proposed infrastructure upgrading.

St Mary's Bay also has many streets which are so narrow that emergency vehicles already struggle to access them. Two increase the population by up to six times more or more will result in chaos. Is absolutely likely that Aucklanders will continue to drive cars, although these will be largely electric ones more predominantly in the very near future. The roads here are simply too small to handle a massive rise in the number of residences as proposed.

Although Auckland Transport seems to believe Copenhagen is the only model four urban development, Auckland is not a small, flat, European cop, mediaeval city will the world developed Metro system.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

St Marys Bay is bounded to the north by an unstable former coastal edge which presents a coastal hazard that has not been considered as a qualifying matter as it should have been. This means that a suitable depth of protection is needed from the former coastal cliffs inland for at least 100 metres where intensification must be avoided to manage the hazard risk.

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#6848

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Christina van Bohemen

Name of organisation/business: Urban Auckland

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be further

Tell us why

The walkable catchments need further detailed work, with more flexibility around their edges to ensure good interfaces with the lower-density areas further out. We note that even 1200 metres is a very easy distance for micro mobility users (bikes, scooters etc). These technologies are already used for first/last mile journeys to Rapid Transit stations, thereby considerably expanding the viable catchment. This should be encouraged further with safer routes and bike lanes.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be further

Tell us why

The walkable catchments need further detailed work, with more flexibility around their edges to ensure good interfaces with the lower-density areas further out. We note that even 1200 metres is a very easy distance for micro mobility users (bikes, scooters etc). These technologies are already used for first/last mile journeys to Rapid Transit stations, thereby considerably expanding the viable catchment. This should be encouraged further with safer routes and bike lanes.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be further

Tell us why

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Support

Tell us why

THAB:

Extending the THAB zoning and increasing the allowable height to 6 storeys is supported in principle, but will require design review to ensure good built form overall, especially in relation to neighbouring zones. Some 3-dimensional studies of allowable developments under the new rules will be useful – showing how adjacent developments will impact on each other, and how they will relate to lower density developments outside the zone.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Support

Tell us why

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

We do not consider the Council’s criteria for assessment robust but, nonetheless, it has attempted to provide a transparent methodology in the time available to it. The Council needs to consider a more nuanced way to achieve density that integrates the built and natural landscape. Retention of the underlying single house zone works against this. We support regulatory flexibility that retains the character of our historic townscapes while enabling intensification.

Our historic townscapes are more than villas and bungalows (much of which is already intensively developed).We recommend that further work is done to identify distinctive areas of our historic and contemporary fabric that may be worthy of protection.

We would support a more holistic methodology that examines the character of the area, and not just buildings. The context of heritage buildings needs to be considered and what contributes to the setting, for example topography, streetscape, trees and gardens, as well as the architecture and materials.

To offset the retention of these cultural landscapes, intensification should be further facilitated along the areas bordering arterial roads and near transport nodes.

7. **What do you think of the proposed residential special character areas that we have identified?** Other

Tell us why

We do not consider the Council’s criteria for assessment robust but, nonetheless, it has attempted to provide a transparent methodology in the time available to it. The Council needs to consider a more nuanced way to achieve density that integrates the built and natural landscape. Retention of the underlying single house zone works against this. We support regulatory flexibility that retains the character of our historic townscapes while enabling intensification.

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To offset the retention of these cultural landscapes, intensification should be further facilitated along the areas bordering arterial roads and near transport nodes.

8. **What do you think of the proposed business special character areas that we have identified?** Other

Tell us why

There should be a more nuanced approach and it should be possible to build higher than the prevailing 2-3 storeys of character buildings - provided the new development builds in response to the particular context. 3dimensional precinct planning should be mandatory for town centres to assist in understanding the potential for development and to reassure the community.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Other

Tell us why

no comment

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

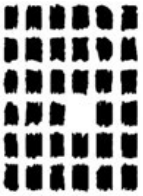
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09 May 2022

To the Unitary Plan Team
Auckland Council

By email to unitaryplan@aucklandcouncil.govt.nz



URBAN
AUCKLAND

The Society for the
Protection of Auckland
City and Waterfront Inc

Urban Auckland thanks Council for the opportunity to comment on its preliminary responses to the Government's recent directives on urban development.

While Council no doubt shares our concern regarding some of the details of the Government's proposals, we support the general push toward more intensive residential and mixed use development of our city. We also understand the need to increase development capacity in areas with good access to employment, education, and social amenity; especially in areas with more abundant transport choice. We note that enabling more growth closer to the centre aligns strongly with strategies of 'Quality Compact City', emissions reduction and the delivery of well-functioning urban environments.

We generally support Council's proposals, but have concerns as noted in more detail below. We consider much more work is necessary to achieve the outcomes we all would like to see.

Specifically, on the points Council has requested our feedback:

- A walkable catchment of 1200 metres from the city centre edge is probably a good starting point.
- A walkable catchment of 800 metres from the edge of our metropolitan centres and rapid transit stops is similarly a reasonable proposition..
- The application of the THAB zoning around town and local centres is good as far as it goes, but our support should be read in conjunction with the qualifications set out below.
- Consideration should also be given to the inclusion of more Mixed Use zoned areas, in lieu of just THAB zoning.
- We have concerns about the methodology to determine the existing housing that is protected under Qualifying Matters / Special Character Areas
- We support the concept of density constraints where infrastructure, particularly transport infrastructure, is inadequate to support higher intensity of development.
- Additionally, we understand it is proposed to abolish the key city-centre controls of Floor Area Ratio and Maximum Height. We support a simplification of development controls in the city centre, but again subject to our qualification set out below.

In the time available to Council to respond to the Government's mandates, the proposed changes to the Unitary Plan appear reasonable. However, the densities of development that will likely result from the changes are problematic on several fronts, all of which spring from the same principle: **As city densities increase, so does the need for better urban design.**

To address this, Council needs to adopt **place-based approaches** that go beyond the two-dimensional land use zoning. These also need to consider landscape, topography, and valued natural features and how building heights relate to these. Good urban design and place-making can't be achieved with traditional planning rules alone. Design leadership is needed to help frame policy and practice towards better city design.

Therefore we would like to comment further on the proposals:

Walkable catchments:
The walkable catchments need further detailed work, with more flexibility around their edges to ensure good interfaces with the lower-density areas further out. We note that even 1200 metres is a very easy distance for micro mobility users (bikes, scooters etc). These technologies are already used for first/last mile journeys to Rapid Transit stations, thereby considerably expanding the viable catchment. This should be encouraged further with safer routes and bike lanes.

Precinct Plans:
The catchments and the centres each need a **3-dimensional 'precinct plan**' to map out in more detail where high density development is appropriate, where new public open spaces will go, and how connections to rapid transit will work. In many instances, this will reveal where development higher than that currently envisaged can be well-located, while retaining the possibility of lower development in others. The forming of successful neighbourhood and town centres across Auckland is too individually specific to be determined by the blunt instrument of 2D land zoning. Precinct plans would also allow the community to have a say in their own neighbourhoods on how height is managed, as well the provision of other changes, like improvements in streets, footpaths, parks and public spaces, tree protection and management of important natural features.

THAB:
Extending the THAB zoning and increasing the allowable height to 6 storeys is supported in principle, but will require design review to ensure good built form overall, especially in relation to neighbouring zones. Some 3-dimensional studies of allowable developments under the new rules will be useful – showing how adjacent developments will impact on each other, and how they will relate to lower density developments outside the zone.

Height Controls:
The removal of FAR and maximum height controls in the city centre is a welcome step forward, but we would be concerned if this meant Council had less say in the design quality of proposals during the assessment process.

The outcome should be the reverse of that outcome, where Council agrees to drop these controls in return for a higher design quality for all developments, implemented through a design review process.

Special Character Areas:
We do not consider the Council's criteria for assessment robust but, nonetheless, it has attempted to provide a transparent methodology in the time available to it. The Council needs to consider a more nuanced way to achieve density that integrates the built and natural landscape. Retention of the underlying single house zone works against this. We support regulatory flexibility that retains the character of our historic townscapes while enabling intensification.

Our historic townscapes are more than villas and bungalows (much of which is already intensively developed).We recommend that further work is done to identify distinctive areas of our historic and contemporary fabric that may be worthy of protection.

We would support a more holistic methodology that examines the character of the area, and not just buildings. The context of heritage buildings needs to be considered and what contributes to the setting, for example topography, streetscape, trees and gardens, as well as the architecture and materials.

To offset the retention of these cultural landscapes, intensification should be further facilitated along the areas bordering arterial roads and near transport nodes.

Urban Tree Protection:
With the proposed intensification it is critically important that there is strong protection in place for significant trees on private land. Trees currently legally protected by being included in Schedule 10 (Notable Trees) and Significant Ecological Areas (SEA's) should be included as 'Qualifying Matters' and the Urban Tree Register needs to be urgently updated to include more trees. Consents need to be required for proposed tree removal and pruning of scheduled trees. If the general tree protection rules can not be re-established, other mechanisms to encourage the retention of mature (but not scheduled) trees need to be considered.

A programme to add street trees to streets currently without them is even more urgent as the city intensifies. They will help address air quality, heat, stormwater, and promote general well-being outcomes. Our streets and roads are our biggest public space and we cannot rely on private land to maintain, let alone increase, our city's tree cover. Precinct planning will help to expedite this and focus tree planting in areas where most needed.

The need to intensify housing in our City is important but with a climate crisis, so is the need to protect and value existing natural vegetation features, and our urban forest.

Conclusion
Urban Auckland does not consider that a good future for Auckland can spring from a simple re-jig of a two-dimensional Unitary Plan. We note that many, if not most, of the things people value about living in Auckland, such as quality public open spaces, good public-transport and active-transport access, and good schools and community facilities are all matters barely considered by the Unitary Plan.

We therefore suggest that much more use has to be made of 3-dimensional planning tools, which can positively assist in shaping the city into higher-density and higher-quality urbanity in

relationship to the varied topography of Auckland and its many natural features. It is also essential to bring the community back into the planning process with the development of Precinct Plans to support the individual character of Auckland's urban areas while allowing intensification. All of this process needs to be backed up by a robust and respected design review process.

Address for service:
Urban Auckland
Christina van Bohemen, Chair

Urban Auckland is a group of independent architects, planners and built-environment professionals who, since its inception in 2000, carry a mandate to promote and encourage the protection and enhancement of the natural and built environment and amenities of Auckland City and the Auckland Waterfront.

#6849

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Janice Garvan

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** I don't know

Tell us why

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** I don't know

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** I don't know

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Other

Tell us why

I think the homes on Bella Vista Road, Galatea terrace & Upton St in Herne Bay should remain protected.The category of building within a special character area is arbitrary. Our house in Bella Vista is better grouped with houses on Herne Bay Rd than much further away in Cremorne St. The boundaries used have a significant effect on the outcome & I believe that the arbitrary method is grossly unfair to the houses in our street & immediate adjoining streets.

The historic heritage of Herne Bay should be protected. The proposed changes will have a significant adverse effect on the special character of the area. HERNE BAY HAS A SIGNIFICANT AMOUNT OF HERITAGE HOUSES & COLLECTIVELY IT SHOULD BE PROTECTED. Once you ruin it ,with high buildings, the beauty & heritage will be lost

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

Please remove the proposed MDRS from Bella Vista Rd.The houses collectively represent a group of heritage villas & bungalows,the character of which will be spoilt & dominated by high buildings.The grading of some individual sites is unfair & not justified.The method of survey, area groupings & grading criterea are are arbitrary. We are all a special character area.

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Herne Bay sewage & stormwater is already under pressure & leaks sewage. The infastructure could not cope with with further overload which would be inevitable . Parking is already at a premium & apartment buildings will only add to this with the increase in residents & cause congestion. Public transport is unreliable.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Intensification of Herne Bay could not happen without sewage & stormwater problems being rectified. Sewage is already in our beaches without having more stress on the system. All the beautiful beaches are often not safe for swimming. Infastructure constraints need to be a

qualifying matter to address how the area could possibly cope with more load due to high rise building

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Special character areas : Herne Bay (besides heritage housing) has a beauty in the landscape- there is beautiful hedging ,tree planting & vegetation. Allowing 3 storey buildings with up to 3 dwellings per site & 50PC building coverage would ruin the landscape of Herne Bay as with more site coverage & building closer to the boundary there would not be the same opportunity for planting. One of Auckland's most beautiful suburbs would be spoilt.

Important privacy information

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#6856

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Fenella Graham-Stewart

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

People dont walk anywhere and certainly wouldn't walk that far to the city, especially due to the hill climbs and descents from this area to the city. There are also a lot of major road crossings between here and the city. I would have thought that there are some much closer sites that could be used for intensification and there seem to be many vacant sites closer in around Albert Street and Victoria Street

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

These issues aren't relative to my area

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** I don't know

Tell us why

These issues aren't relative to my area

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** I don't know

Tell us why

This might be a much more appropriate distance for walking

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

It appears that the special character areas which have been excluded have small sections sizes which would make them unsuitable for development.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

Even though the areas marked in red in Freemans Bay havent been included as qualifying matter they should be as they are part of an historic suburb and are part of Auckland history. Excluding those areas will seriously effect the integrity of the high quality area

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

The infrastructure of the stormwater and sewage capacity in Freemans Bay will never support intensification in this area. It will just cause more overflow into the harbour which is seriously overwhelmed already. Certainly all the surround ing streets in this area wont support all the traffic for huge infrastructure - they are narrow and limited already. Having large infrastructures

on each side of these narrow roads would surely cause loss of light and lack of privacy - these suburbs are just not wide enough or with large enough sections to support large infrastructure.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

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#6858

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Nigel Gleeson

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

St Mary's Bay isn't within a walkable distance of 1200 metres to city centre amenities. The walkable route to the City is beside the motorway and is only suitable for walking during daylight hours (no public lighting). Other walkable routes involve steep hills and are unsuitable at night.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The closest rapid transit stop to St Mary's Bay is Britomart or the future Victoria Street station. Neither are within 800m of St Mary's Bay

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

None of the St Mary's Bay suburb is within 400m of the City Centre - so it is beyond the walkable catchment threshold.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

There are 200+ properties within St Mary's Bay that are of historic heritage value 6 and 5. I support creating Special Character Sub-Areas around clusters of heritage houses in St Mary's Bay in addition to those identified on the draft maps.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

This technique should be expanded over the entire suburb of St Mary's Bay collecting all houses of Rating 6, 5 & 4 as sub-areas of special character.

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

St Mary's Bay has significant infrastructure constraints with stormwater, wastewater and the overall road network. The upgrading of the stormwater/wastewater system and the planned separation is based on the existing development capacity. Any proposed increase in residential density will not be accommodated in the proposed infrastructure upgrading.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

St Mary's Bay is bounded to the North by an unstable former coastal edge which presents a coastal hazard that has not been considered as a qualifying matter as it should have been. This means that a suitable depth of protection is needed from the former coastal cliffs inland for at least 100m where intensification must be avoided to manage the hazard risk.

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#6864

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Elke Chilwell

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

I do not support this where the walkable catchment will infringe on special character areas such as Freemans Bay, St Mary's Bay, Grafton, Parnell. I support this in all areas where special character areas are not affected.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

I'm not sure what you mean by metropolitan centre. Does it include a small collection of local shops? I think it would have to depend on the metropolitan centre and the nature of the neighbourhood. Special character areas should be protected.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

I support this as long as special character areas are not affected.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Support

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Support

Tell us why

This makes sense as long as it done sensitively and it has local support, and protects special character buildings.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

From what I can see a lot of Grey Lynn is able to be intensified. This cannot be allowed to happen. Allowing much of this beautiful suburb to be turned into 3 story intensive housing would be a travesty. Reducing limits on building heights and density does not 'ensure the character values of these areas are retained'.

As Mark Todd of Ockham Residential (who builds incredible beautiful apartment buildings) said, Auckland's largely intact wooden housing suburbs from the late 19th and early 20th century are "international architectural treasures". He identified Freeman's Bay, Ponsonby, Grey Lynn and St Mary's Bay as "suburbs I strongly believe are taonga".

I also strongly believe this. A beautiful collection of old wooden villas, almost completely intact over entire suburbs, they must be protected. They are all made from native timbers. They are like the beautiful homes of San Fransisco, that people travel the world to see. We cannot let them be knocked down for intensification when there are so many areas that can be intensified without losing our 'international architectural treasures'.

I have lived in one of these old houses in Grey Lynn for over 20 years, and I do not consider myself just as an owner. I am a caretaker, a guardian of this 100 year old house and every alteration I make to this house, I do with kaitiakitanga at the forefront.

I strongly support intensification along arterial routes such as Great North Road, New North Road, Dominion Rd etc, but not within the character suburbs such as Grey Lynn, Ponsonby, St Mary's Bay, Freeman's Bay, Northcote and Devonport. Let the intensification happen around these suburbs, not inside them where each and every one of the large new buildings will be completely out of place. I love the intensification that is taking place along Great North Road, Surrey Crescent, and at the top of Williamson Avenue. This is what should be happening, building apartment buildings where car yards, and old industrial/commercial buildings once stood.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

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8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I think more areas or parts of areas should be identified as a qualifying matter

Tell us why

Our business special character areas should be protected. Auckland has not done a good job of protecting our special character buildings. There are plenty of non character areas both business/commercial/industrial/residential that can we used for intensification purposes while retaining our special character buildings.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

The last thing Auckland needs is more pressure on our stormwater systems that result in unsafe swimming at our beaches. I think this is very sensible to make sure areas that have long-term infrastructure constraints are a qualifying matter.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

I support all these other qualifying matters. Auckland Council needs to be very careful to protect our beautiful city. Specifically maunga viewshafts, heritage suburbs, and special character commercial centres.

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#6865

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Chris Mason

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

A site is located over 2km from the Auckland CBD district is too far to justify location as a reason for intensification

There are no dedicated cycle lanes or pedestrian links from Herne Bay to the CBD and the college hill terrain makes it unlikely that residents would use these modes of transport to get to the CBD.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** I don't know

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** I don't know

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

The NPS- UD as currently proposed would allow 3 townhouses per site and 50% building coverage within this area.

It is considered that this proposal would have serous detrimental effects to an area with outstanding overall heritage values as well as negative impacts on overall street aesthetics in a currently quality livable area, particularly, Bella Vista Road, Upton Street and Galatea Terrace.

7. **What do you think of the proposed residential special character areas that we have identified?**

Tell us why

Please remove the proposed MDRS zoning from Bella Vista Road, Galatea Terrace and Upton Street. The houses in these streets individually are of a high character and quality and collectively represent a group of large early 1900 villas that are not represented anywhere else in Auckland. The character of the area, with large gardens and wide streets remain as it was in the mid 1900's.

The site is located over 2km from the Auckland CBD district which is too far to justify location as a reason for intensification

There are no dedicated cycle lanes or pedestrian links to the CBD and the college hill terrain makes it unlikely that residents would use these modes of transport to get to the CBD.

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Herne Bay has a combined sewerage and stormwater system that already results in frequent discharges of raw sewerage to the beaches. The proposed intensification in terms of increased coverage and increased sewerage volume will further overload the current infrastructure.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

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#6874

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Steven Zanoski

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

800 to 1200 is a reasonable difference, even on a flat surface. But when you look at a city like Auckland, or Wellington, this takes you up considerable hills. It's well known that people en masse won't walk hills. In marketing terms it's proven that shopping precincts on hills cannot survive long term (look at Parnell). People will not walk; it creates urban wastelands.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

See comments above. 200 metres or less feels reasonable to me, which will keep development of catchment centralised and intensified.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

Again, topography through most of Auckland Super City will be a problem. Also, this encroaches on the unique character of many of Auckland's suburbs, which is why people want to live there in the first place (and thus require transit stops).

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

I feel the distance is too much when there is still so much development potential in a closer catchment area that will not encroach on character suburb.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Support

Tell us why

200 metres feels reasonable - and a focused, smaller area to build its own character.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

I am not convinced by the definition of special character. I have heard of areas in St Mary's Bay and Freemans Bay not qualifying as special character due to housing intensification in certain streets that started in the 70s and has resulted now in a mash up of styles. This plan will not solve any of this, but make things worse. Too much has ben invested in character housing in these areas to move on for developers. Any new housing will not be affordable; it will remain expensive due to the gentrification of these areas. To establish affordable housing here, you need to reverse the gentrification of the past 40 years and turn the areas back into slums. Surely this is not the plan?

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

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8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I think more areas or parts of areas should be identified as a qualifying matter

Tell us why

Again, am not convinced by the definition of special character.

Infrastructure constraints

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This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Infrastructure is vital to any development. This is just common sense.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

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- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

No. My concern is with housing and people - and why anyone would want to live in Auckland. I support development - but concentrated and planned... not scattershot through surrounding suburbs.

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#6877

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Shannon Tottle

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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We are proposing:

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- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

The edge of the city is not a relevant measurement point to the residents. We need to access transport, retail, offices & other services, which are more central in the city & far greater than 1.2km from home. The measurement should be from a place we actually use such as Britomart & should be less than 1.2km because of the hilly nature of the suburb, making walking more difficult & not feasible for many. There are better areas more suited to intensification closer to the city such as Beaumont & Wynyard Quarters, City Works Depot etc

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** I don't know

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** I don't know

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

The land area made available for redevelopment by excluding certain special character areas is not very large & the sections within are typically small with difficult topography, strained infrastructure (the 3 waters, schools etc.) & often narrow difficult streets, so are not suited to

having an increase in population density. Freemans Bay has a large number of historically valuable houses that seem to be incorrectly scored in the survey provided resulting in a lower score than should be the case. The proposed changes to Freemans Bay will ultimately result in a loss of the special character & history that the houses in the suburb provide & this change when complete is totally irreversible.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

Firstly the survey is inaccurate in its record of scores awarded to properties, so the overall result is wrong. It should be much higher so the survey must be performed again. The suburb includes a great number of historically valuable houses that enables the suburb to be a reflection of part of the history of Auckland. Allowing these houses to be demolished or even overshadowed by tall buildings will result in a total destruction of the history & sense of place the suburb provides. Council needs to protect the history & find better ways to solve the current request of the Government for intensification. As an example of the historical development of Auckland, Freemans Bay must be retained for todays & critically our future generations

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Ponsonby Rd is an important part of the history of Auckland. It provides an important contribution to the sense of place & identity. It must be retained for all & for future generations

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Freemans Bay water system will not support the intensification proposed. The streets are also narrow & restrict access so the greater volume of people resulting from intensification will generate an insoluble access & congestion problem. Also, access for construction vehicles is already troublesome for what are currently typical home renovations (small projects) but will be virtually impossible with high volume construction & large vehicles. Access for emergency service vehicles will also be problematic & with the increased population there will also be increased emergency vehicle call outs. Restricted access will increase response times & increase risks to human life due to delays

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

Important privacy information

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#6894

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Jason Pearce

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

St Marys Bsy is rated as walkable but none of St Marys Bay is within 1200m of city centre amenities that residents might actually use e.g retail, entertainment, rapid/public transport hubs. The supposed walking route alongside the motorway is not lit, potentially unsafe and only suitable during daylight. Steep steps are required to reach most points in St Marys Bay from that route. Alternatively the route up college Hill is long and steep

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?**

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

St Marys bay is rated as walkable YET the closest rapid transit stops are Britomart and in future Victoria Station, well outside 800m

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

None of St Marys Bay is within 400m of the city centre

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?**

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

There are over 200 houses of historic heritage rating 5 or 6 in Dt Marys Bay. I support creating special characters sub-areas around clusters of heritage houses in St Marys Bay in addition to those identified on the draft maps.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

Should be expanded over the entire suburb of St Marys bay counting all houses rated 4, 5 and 6

8. **What do you think of the proposed business special character areas that we have identified?**

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

St Marys bay has significant infrastructure constraints in stormwater, wastewater and roading. Current stormwater and wastewater upgrade/separation is based on the existing development capacity, and does not accomodate increased residential density

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

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- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

St Marys Bay northern boundary is an unstable former coastal cliff that should be considered as a qualifying matter but has not been. A suitable depth of protection from these cliffs of at least 100m protected from intensification should be allowed for

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#6907

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Alice Austin

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Support

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be closer

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

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Special Character Areas

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

7. **What do you think of the proposed residential special character areas that we have identified?** I don't know

Tell us why

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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- Stockade Hill Viewshaft
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- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

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#6920

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Kieran Jones

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

The proposed outer limit of 1.2km fails to consider the immediate topography and major road crossings. The limit should be reduced to under 1.0km as a result. Further, where the edge of the city limit on the western side ends it is unrealistic to use the measure in this way due to high density of offices and retail and the two universities.

The limit also exceeds the distance the average city dweller would consider to be generally walkable, therefore its use in this way is inappropriate.

There are also other better suited sites for development in the general vicinity including: Wynyard quarter, old city works depot, and various vacant sites Victoria and Albert Streets.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be closer

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

Substantial work and effort was expended under the original unitary plan to identify and categorise special character areas requiring protection. There is no good reason this prior work should be discarded in the manner contemplated by the new zoning.

The amount of land which would be made available for redevelopment by excluding special character areas is minute compared to the existing greenfields that are already available to address new building requirements for the next 20 years. To completely ignore the city's unique heritage elements in favour of low cost high density housing is not what the majority of existing residents want and will not improve or enhance the living standards or experience of residents.

The general type of sites subject to special character areas have small land sizes and difficult topography and infrastructure constraints. Therefore, they generally lend themselves to be unsuitable for redevelopment in the first instance.

There has been no accounting of the way Historical Value us quantified in the councils suggestion for Special Character value. This needs to be reexamined on a more informed basis.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

'The areas marked as red in Freemans Bay should be included as a qualifying matter for the following reasons:

- Even if not high quality character areas (which is denied), they are part of a historic suburb and contribute to the retention of Auckland's history and sense of place.

-It is not possible to exclude those areas in Freemans Bay without adversely affecting the integrity of the surrounding high quality character areas.

-Ryle Street and Wood Street, the areas which have been excluded include high quality character housing with historical relevance but have been excluded for no reason other than to align with other Kainga Ora owned property - this is wrong.

-Believe local council should spend more time at their own library researching historical suburb photos to better understand what they are talking about.

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Retaining the history and character of areas such as Ponsonby Road is crucial to the sense of identity and place for local community and Auckland as a whole.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

The existing Freemans Bay infrastructure will not support intensification due to limited stormwater/sewage capacity. Freemans Bay will not be linked to the Western Interceptor and therefore overflows to the harbour will increase. This is environmentally detrimental to the city.

Many of the streets in Freemans Bay, such as Ryle Street, present access difficulties for emergency services such as the Fire Brigade and ambulance vehicles. High rise buildings such as apartments present a much greater fire hazard for residents than low rise buildings, and this will put apartment residents (and those unlucky enough to live next to them) at high risk. Ryle Street with its current Kainga Ora pensioner flats are also not suited to redevelopment as emergency services that attend the flats (quite frequently) will have trouble accessing them due to narrow streets. Lastly, the narrow streets, such as Ryle Street, and their narrow footpaths are not suited for contractor/supply access for building apartment blocks. Six floor plus buildings will create wind tunnels and extreme street shading with the narrow streets and general existing buildings being close together. Privacy issues will also be created from apartment blocks being so close together.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across

areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
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- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Climate Change - Freemans Bay has significant vegetation and green areas which provide environmental and cooling benefits to the city. Intensification will result in a loss of these benefits at a time when climate change requires their retention.

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#6926

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Graeme Burgess

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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We are proposing:

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- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Other

Tell us why

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Other

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Other

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Other

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Other

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

7. **What do you think of the proposed residential special character areas that we have identified?** Other

Tell us why

8. **What do you think of the proposed business special character areas that we have identified?** Other

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

Important privacy information

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1. My name is Graeme Burgess. I am a registered architect and a fellow of the NZIA. Through, Burgess Treep + Knight Architects, which I began with my partner Lucy treep in 1989, I have been involved in heritage and conservation matters since 1990. I participated in the AUP process as a heritage consultant to Auckland Council, and am familiar through my work with both control mechanisms and survey methodology for areas of Historic and/or Special character. I am a member of the Auckland Council Heritage Advisory Board.

2. I understand that the Housing Enabling Act (HEA) requires Council to determine which matters it considers to be qualifying matters, and where these are not matters allowed for in the legislation there is a further requirement to evaluate those places site by site.

3. Council has put forward Special Character (SC) as a qualifying matter. I support this. This submission focusses on the special character areas as a qualifying matter. I am an architect involved in heritage work and am familiar with these areas.

4. In response to the requirement of the HEA to review those areas, Council has put forward preliminary surveys of those areas. I commend Council for carrying out this onerous obligation, however, I consider that the process undertaken goes beyond what is required by the HEA, and that the methodology used is overcomplex and somewhat arbitrary.

5. The methodology for this evaluation uses an abbreviated version of the criteria set out for Special Character under Schedule 15 (15.1.1). Why the criteria have been compressed and modified has not been explained. Other criteria written into the Schedule 15 description of special character relating to subdivision pattern, landscape features, vegetation and streetscpe, are either somehow bundled into the 5 criteria used, or have been ignored.

6. The Special Character Area Overlay is not new. The area of the Special Character Area Overlay follows the area of what was the Isthmus A Zone under the former Auckland City Council District Plan, a zone put in place, as the Residential 1 Zone, in the 1990s. The Character overlay areas are established areas where that character has already been assessed and

managed as Special Character. It can be argued that the particular values of these areas have already been established and managed.

7. These areas have, for over two decades, been identified through Council's District and Unitary plan processes, and have not only been assessed at those earlier times, but have been managed over time through the Resource Consent process. All changes made to buildings in these areas have been subject to a full Resource Consent as a discretionary activity. Regardless of the results, those changes over the last 25 years have been considered against the framework of Schedule 15 assesment criteria for Special Character. All new works carried out over that time period in these areas has been endorsed by Council as meeting the requirements of Special Character.

8. The criteria put forward, a compressed version of the Schedule 15 critera, are not readily understood, and when applied can become highly subjective, particularly in an area such as Freemans Bay where the historic pattern of development is unusual. To assess the area the original pattern of development should be taken into account. On the crosss streets of Freemans Bay, such as Wood Street and Arthur St, houses were built with their primary frontages facing east to the city and harbour, regardless of which side of the street they are on. On the eastern side of these streets the road frontages are the service side. Understanding matters such as this is critical to any evaluation of Special Character.

9. I disagree with the points based assessment, and consider that this approach does not provide an appropriate framework for assessing the contribution of each place to what is a collective whole. I understand that the points have been used to determine in each individual evaluation, whether the site is Character Defining, Contributing, or not. I question the judgements being made in each of the criteria and I also question the values given to these criteria. In the Council assessment methodology put forward, each criteria is weighted evenly; a point for style, is no different from a point for street frontage. Without debating the criteria, I consider that this is an un-nuanced system. Each of these matters is complex and subject to debate. In my view a rating from 0-100 for each of the criteria with a final weighing of the results would, perhaps, allow for a more balanced assessment. However, even that would not remove difficulties associated with interpretation. A far simpler approach, such as that used in the Schedule 15: Business Special Character Overlays, (where each place is evaluated as: 'Character Defining', 'Character Supporting', or neither), would, in my opinion, have been a better framework for this type of evaluation. The Sydney suburb of Glebe extends this simple

assessment framework to: 'Character Defining", "Character Supporting", "Neutral" and "Detracting", and I note that these terms are referred to in the Council methodology for the survey.

10. As the regulations covering the overlay require all changes to buildings within the overlay areas to be approved through the resource consent process, and as this has been legally required in these areas since they were established changes to the bulk and form of these buildings should be allowed for by the survey methodology, as those changes have been approved as being sympathetic to the character of the area through that resource consent process. The survey methodology , through its points based system, places emphasis on 'period of development' and on 'level of physical integrity'. If the survey is assessing the 'historic heritage' value of the area these matters should be given weight in the process, however the overlay as it stands is 'Special Character'. The areas are 'Special Character' and have been managed as 'Special Character'. Where changes have occurred and have been consented under the former Isthmus A controls or the Special Character Overlay Area controls, the bulk and form of those altered places is expected to support 'Special Character'. In my reading of the survey results, places that have been altered during this period, have been highly undervalued under the points system that has been used.

11. I do not support the application of percentage based thresholds as a methodology for weighing the values of the 'Special Character' areas against the requirements of the HEA., particularly given the use of the points based evaluation to create that percentage figure. Where this approach has been put forward by Council in areas such as Freemans Bay, based on the site by site evaluations, also put forward by Council, the result is the immediate loss of 'Special Character' in large areas of the 'walkable catchments'. In my opinion, special character, as a qualifying matter, should carry greater weight than the general overlay requirements of the Act. The percentage method for the re-evaluation of these used is arbitrary.

12. The survey mapping creates other risks. Places within the survey areas that do not achieve a high rating that remain within an area of overall 'high value' seem to represent sites that could be subject to the requirements of the HEA. Without checking each of those properties, in principle I agree that those properties do not contribute to the overall 'Special Character' values of these areas, indeed some detract from those values.

13. The current controls for the SC overlay areas allow for these properties to be redeveloped, and, as demonstrated in the submission by the Character

Coalition, these sites can provide opportunity to intensify the area without compromising 'Special Character'. I was involved in the consent process for the Co-Haus development on Surrey Crescent as a heritage consultant. That development has established what is possible on a large site within the overlay area.



Cohaus, view up Browning St.

14. The design of the Co-haus project considered the effects of the bulk and massing of the new buildings on the surrounding Special Character environment. The effect of the devlopment on its neighbours, has been mitigated to a large extent by good design and sensitive planning of the layout of this set of apartments with a common courtyard and other facilities. This development does not impact the area to the same degree as the slab terrace house block on the adjoining area.

15. I support Council's proposal that 'Special Character' should be a qualifying matter in the application of the HEA over this area of the city. I understand that Council has been required to carry out an assessment of the 'Special Character' area on a site by site basis and I commend Council for carrying this out within a tight timeframe when we were all impacted by COVID restrictions.

16. In my opinion the methodology used in the Council surveys of these areas is problematic for the reasons set out, and as a consequence the broad evaluation of these areas, by percentages against the other requirements of the HEA, does not give sufficient overall weight to the collective value of these places.

17. I do not consider that these (Special Character) areas of the city should remain unchanged. As stated, these areas have been managed as 'Special

Character' for decades, and in that time many changes have occurred, including a degree of intensification as demonstrated by the Co-Haus example. The area will continue to change and in accommodating that change should maintain its 'Special Character'.

18. The remaining areas of Auckland City that are recognised as 'Special Character' represent collective values that are important to us all in both our understanding of the history of the development of our city, and in our common appreciation of the urban amenity of Auckland and its 'Special Character' created over a period of one hundred and seventy years.

19. In addition to the Special Character Areas, I consider that other matters should also be recognised as qualifying matters; Tree protection, the protection of views of our vlolcanic cones, and the need for proper infrastructure.

20. Auckland has become an urban forest formed by a combination of public parks and the trees people have planted on their own properties. The HEA threatens this shared amenity in all parts of Auckland. The value of trees and treescapes to Auckland should be considered a qualifying matter.

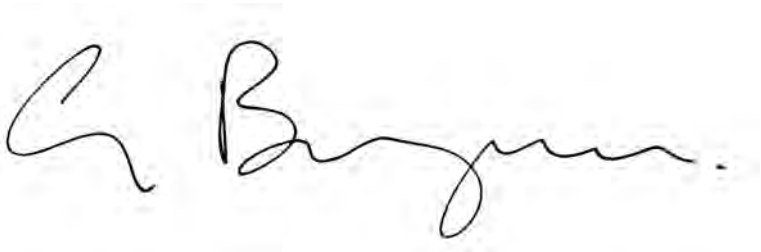
21. Our volcanic cones are a defining feature of the city as a whole. These landscape features are powerful symbols of this place and not only should they be managed and protected, the recognised view shafts to the cones should be recognised as a qualifying matter.

22. For any kind of intensification the infrastructure of an area must have the capacity to allow for that growth. I support infrastructure/lack of infrastructure as a qualifying matter.

23. I support the concept of intensification, but deeply regret that the proposed development framework does not directly address social inequity or affordability.

24. In my understanding the value of good design that gives consideration to the enviromental qualities of these places as well as consideration of sustainability, is also not addressed by the HEA.

25. Thank you for the opportunity to make this submission



Graeme Burgess
9 May 2022

#6943

Government's new housing rules: What it means for Auckland

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Sahil Tiku

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be further

Tell us why

City centre commute habits demonstrate an appetite for walking/active transit based commutes that rival equivalent times in cars, which for Tāmaki Makaurau comes to approximately 30 minutes. A 30 mintue commute from the city centre is approximately 2500m - double the catchment areas proposed by the council.

Combined with future AC + AT improvements to walking/cycling infrastructure and the added benefit of not having to pay for parking or deal with traffic, this sets the city up perfectly to take advantage of a larger walkable catchment.

Ideally, a mixed use business zone should be applied within this catchment to enable organic growth of medium to high density mixed use spaces and take advantage of the draft parking strategy + other emissions senstitive infrastructure proposals. Special Character Overlays also need to be removed in this catchment to enable the development of housing of an appropriate density to support these upcoming infrastructure changes, and to create afforable and livable communites for inner-city residents. Without this urgent density and land-use change, we run the risk of underutilising high-priority infrastructure development and crippling business cases for future emissions-sensitive investment.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be further

Tell us why

See above - our ever expanding public transit and micromobility support and infrastructure enable us to concentrate density in these metropolitan centres - creating more homes and urban hubs in Auckland that relieve pressure on the CBD.

Aucklanders in our last Household Travel Survey have proven a willingness to walk up to 20 minutes from their homes to metropolitan centres (and I certainly do - my home is almsot exactly a 1.5km walk from Papakura Train Station and I would absolutely walk/bike to the town centre nearby were I provided with safe infrastructure) - which allows the council to double these walkable catchments to up to 1600 metres.

Special Character Overlays again serve only to threaten the positive outcomes associated with livable density in these areas.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be further

Tell us why

Firstly, under the NPS-UD - rapid transit catchments should also be placed around high-capacity bus routes.

Research shows the dominant catchments around rapid transit to be around 2000, - more than double the council's proposed catchments for rapid transit stops. The same research (Wilson, 2013) also demonstrates that Aucklanders are willing to walk that distance regularly for reliable rapid transit - which will become momre accessible as we implement upcoming infrastructure plans and investments, such as connections to the GI cycleway, or extensions to the Eastern Busway.

In the first 200 metres around these stops, the Business - Mixed Use zone should be applied - supporting the development of town centres and livable density along existing, established rapid transit routes and bringing more people into these catchments than purely using a THAB zone. SCAs again threaten the potential of these areas.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be further

Tell us why

To develop livable 15 minute neighbourhoods - especially on the isthmus - we need to anbale density around accessible town centres at a much greater extent than the council proposes, lest we fall into a trap wherein the allowed densities around developing urban centres are not enough to sustain them./gain positive returns from insfrastucture investments/expenditures.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be further

Tell us why

Small town centres need support to grow and foster developin businesses - and they require more livable density in the surrounding areas to justify public infrastructure investment - e.g. parks, cycleways, shared paths, etc.

These centres have the potential to become key 15-minute centres for smaller suburbs in Auckland, particularly the isthmus, and require the support of livable, dense housing to do so. The proposed figure of 200m falls short of the level necessary to facilitate this, and should be doubled to 400m at the very least, if not further.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

While the character and history of our city is important, many of the areas the council has defined as Special Character fall directly within walkable catchments.

Our city's emissions targets demand density, and SCAs should not impede the devlopment of new and livable housing in these walkable catchments. WHile I support the establishment of SCAs beyond walkable catchments, we should not be crippling the growth potential of Auckland by limiting cutting-edge development to protect cookie-cutter villas that in many cases fail to meet healthy homes standards and breach current planning rules.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are areas that should not be identified as a qualifying matter

Tell us why

Any SCAs in walkable catchments must be removed from our reponse to the MDRS.

These catchments require density, and houses that support car-free living that are healthy and warm and build to modern standards. Stopping walkable catchments from realising their full potential to protect housese that that are longstanding contributors to our nation's apalling respiratory illness rates while also artificially inflating housing scarcity is a farcical approach to planning in the 21st century.

I support the existence of SCAs to protect the character of our city outisde of walkable catchments - but the future safety of our children and the reduction of our emissions and and end to car-dependency must take precedence.

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

For the same reason as in the previous response - SCAs cannot prevent the development potential of walkable catchments.

Atop this, business zones need flexibility - cities must be allowed to develop organically within their planning constraints - stopping that to protect 'character' is contrary to our position as a 21st century city.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Do not support

Tell us why

Providing infrastructure to support the growth and continued satisfaction of residents is one of the base responsibilites of government at ALL levels - it is the responsibility and mandate of our CCOs to provide and maintain this infrastructure.

To use this as a justification for failing to allow Auckland to reach its development potential is to fly in the face of the ratepayer - we cannot lose out on sustainable cities because our government is placing infrastructure constraints overlays on areas deemed 'too difficult' - the impact of this would be substandard, low-density housing whose negative imapcts will be felt throuhgout surrounding neighbourhoods for decades.

Auckland Council and its associated CCOs should look to this as an opportunity to shore up difficult to maintain infrastructure and futureproof our city, not creating scenarios that facilitate greenfield development.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
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- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Aucklanbd Council has not yet provided information on these QMs, let alone ascertaining whether they are legal under the NPS-UD or amendments to the RMA - further information and investigation must be presented to the public.

In principle I support the viewshafts for built form controls in the city centre and character building throughout the Queen St/Te Wai Horotiu valley, but again the council has yet to provide specificity or the opportunity for detailed feedback on these.

I support (and note a lack of consideration for) viewshafts of cultural significance to mana whenua - as Tiriti partners it is the job of the Council to uphold our Tiriti obligations, including the rangatiratanga of mana whenua over taonga.

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#6946

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Laurence Nash

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

It should be reduced to 500m or 800m

Aucklanders wanted satellite centres (linked by excellent transport) as a plan for population growth. A 1200m walkable catchment encourages over-densification of the centre at the expense of losing important heritage areas that make Auckland a unique destination and place to live. It should be reduced to be equal to the other rapid transit stops, metropolitan centres and/or large town centres to promote more equal growth across the region.

For Freemans Bay the steep hills out of Queen St and up to Ponsonby Ridge means most people do not walk from the CBD. Walkable catchment should be reduced to reflect topography of the area.

Other suitable sites with better infrastructure to the already dense inner city suburbs could be just as suitable by simply extending a bus route or increasing frequency of transport service.

There are even other vacant sites within the CBD where land is available (City Works depot, more land north of north wharf than lies south of it) but is not even now being utlilised. Lets use what we have first before proposing the opportunity for 16 – 18m buildings alongside character houses which will destroy their access to what makes a healthy home (access to daylight & sunlight).

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

500m is a more appropriate distance for walking provided the topography is not too challenging and high character suburbs are not destroyed and there is a buffer for access to daylight and sunlight for houses near the proposed zone.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

500m is a more appropriate distance for walking provided the topography is not too challenging and high character suburbs are not destroyed and there is a buffer for access to daylight and sunlight for houses near the proposed zone.

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Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Support

Tell us why

This seems sensible provided it does not mean existing character heritage suburbs are not eroded and there is a buffer for access to daylight and sunlight for houses near the proposed zone.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Support

Tell us why

This seems sensible provided it does not mean not mean existing character heritage suburbs are not eroded and there is a buffer for access to daylight and sunlight for houses near the proposed zone.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

Auckland Council has been at pains to protect special character area for years (pedantically so). This is what the people of Auckland have said they wanted in their city and was written into the carefully structured and perceived Unitary Plan. To erode years and years of work is a desecration of the place we live and the values we have chosen to have upheld.

The amount of land which would be made available for redevelopment by excluding certain special character areas is very small. Given that the Auckland Urban area is 1,100km2 surely the continued protection of what has already been identified is warranted.

Generally the special character areas such as Freemans Bay which have been proposed to be excluded have small section sizes, difficult topography and infrastructure constraints which make them unsuitable for re development.

No accounting of the Historical Value is quantified in Councils suggestion for Special Character value. This needs to be addressed.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

The methods used to determine these character area are of concern.

For example in Freemans Bay North the centre of the suburb is proposed to be densified simply because it has not reaching a 75% threshold deemed high character. Some important historic character houses have not been deemed "high character" because of a high fence out the front when they still contribute to the streetscape from behind the fence and when viewed from other surrounding streets there scale and form contribute to the context of heritage/historic suburb. Densification would gut the centre of what little is left of this historic suburb. It will result in historic tokenism and overshadowing or those token houses left so that the suburb loses its amenity and sense of place. There is much value in having this group of houses together as a neighborhood for tourism (it is unique to Auckland and as a local I know appreciated by tourists who chose to stay in and walk around the area because of it's unique character) as well as for it’s heritage value to Aucklanders.

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Retaining the history and character of areas such as Ponsonby Road is crucial to the sense of identity and place for the local community and Auckland as a whole.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Roading/Access Infrastruture: Many of the streets in Freemans Bay already present access difficulties for Fire Service and ambulance vehicles, furniture delivery and removal trucks, even just residents parking get side swiped on a regular basis. It doesn't make sense for example to make the denser areas of Freemans Bay north in the very centre of the suburb where streets are narrow and steep and wouldn't even meet Auckland Unitary Plan Transportation Rules for Access to sites.

Sewer/Stormwater Infrastructure: The existing infrastructure in Freemans Bay will not support intensification due to limited stormwater/sewage capacity. Freemans Bay will not be linked to the Western Interceptor and therefore overflows to the harbour will increase. There is already problems with flooding and stormwater downstream of this area which will potentially become worse.

Its makes environmental and financial sense to prioritise development in other areas where existing infrastructure permits.

The extremely narrow street/footpath infrastructure of upper North Freemans Bay would see the creation of extreme street shading, lack of amenity and vegetation with such narrow streets. Privacy issues created by apartment blocks facing each other across such narrow distances would be extreme.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Existing Density; Climate Change/Native Species near the Central City; Available Greenspace & Parks

Existing Density: Freemans Bay with it's small lot sizes and closely packed houses already has significant density (compared to other Auckland suburbs) due to its history as a working class heritage suburb. Other areas with better infrastructure and less density would provide more benefit than targeting suburbs that are already densely inhabited such as Freemans Bay

Availability of Greenspace: There is already a lack of greenspace and parks for use by locals in Freemans Bay which means they will only get more crowded as more apartments are built. The current small lot sizes allow some private greenery that contributes to the public realm which would be lost through further densification of the area.

Climate Change and Native Habitats: The small lot sizes of Freemans Bay have vegetation and green areas which provide environmental and cooling benefits to the Central City. Native birdlife has slowly returned to this area. New intensified zoning will result in a loss of these benefits at a time when climate change requires their retention.

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#6947

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Yvonne hill

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

None of St. Mary's Bay is within a walkable distance of 1200 metres to City Centre amenities which residents use. These include Retail, entertainment facilities, rapid transit:public transport hubs.

The walkable route to the City Centre beside the motorway is only suitable in daylight hours. It has no public lighting and is unsafe environment. Other return route's from the City Centre to Dt. Mary's Bay involve steep grades unsuitable at night for the population cohorts of St. Mary's Bay.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?**

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The closest rapid transit Storting St. Mary's Bay is Britomart of the future Victoria Street station. Both are NOT within 800 metres of St. Mary's Bay.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

None of the St. Mary's Bay suburb is within 400 metres of the City Centre

This means St. Mary's Bay is beyond the walkable catchment threshold

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?**

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Within St. Mary's Bay there are over 200 properties of historic heritage value Rated 6 and 5. I support creating Special Character Sub-areas around clusters of heritage houses in St. Mary's Bay in addition to those identified on the draft maps.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

This technique should be expanded over the entire suburb of St. Mary's Bay collecting all houses Rating 6,5 and 4 as sub-areas of Special Character

8. **What do you think of the proposed business special character areas that we have identified?**

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

St. Mary's Bay has significant infrastructure constraints with storm water, wastewater and the overall road network. The upgrading of the storm water/wastewater system and the planned separation is based on the existing development capacity. Any proposed increase in residential density will not be accommodated in the proposed infrastructure upgrading

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

St. Mary's Bay is bounded to the north by an unstable former coastal edge which presents a coastal hazard that has not been considered as a qualifying matter as it should have been,

This means that a suitable depth of protection is needed from the former coastal cliffs inland for at least 100 metres where intensification must be avoided to manage the hazard risk,

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#6966

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Richard Cave

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Support

Tell us why

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Support

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Support

Tell us why

Intensification around town and local centres

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Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Other

Tell us why

I support however heritage housing areas must be protected and not compromised by intensification.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Other

Tell us why

Where appropriate I support but the intensification must not compromise quality heritage housing areas.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

City fringe suburbs have outstanding examples of Victorian and Edwardian buildings. They must have greater protection. Intensification areas should focus on neighbourhoods where there are not buildings of special character.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I think more areas or parts of areas should be identified as a qualifying matter

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

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9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

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#6975

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Rachel Larsen

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Other

Tell us why

I do not support a Terrace Housing and Apartment buildings zone in Herne Bay as it departs from the historic nature of the area. Also Three Lamps and Herne Bay shopping/eateries would be struggle to even be classed as a small town centre I would have thought.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I think more areas or parts of areas should be identified as a qualifying matter

Tell us why

Infrastructure constraints

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We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Herne Bay already has infrastructure that is under pressure and intensification would only worsen this situation.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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#6985

Government's new housing rules: What it means for Auckland

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Your details

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Name: Selena Dewar

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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We are proposing:

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These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Other

Tell us why

Unsure about this as it currently feels as though there will be a shift in the amount of people coming into the CBD post-covid.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Support

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Support

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Support

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Support

Tell us why

Qualifying matters

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The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

I think all special character areas should be exempt because that is why they were defined as such in the first place. However, I think that the special character/heritage overlay areas are possibly excessive as they currently stand.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

I don't think the mix of what should be up-zoned and not is correct.

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Important privacy information

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#7006

Government's new housing rules: What it means for Auckland

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Gael Baldock

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

It should be closer and a tighter area for 6 storey developments. Exception for historic and character areas, they should not have 6 storey at all

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

It should be closer and a very tight area for 6 storey developments. Then 4 storey Exception for historic and character areas, they should not have 6 storey or 4 at all

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Support

Tell us why

It should be closer and a very tight area for 6 storey developments. Then 4 storey Exception for historic and character areas, they should not have 6 storey or 4 at all

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

Hubs need to be more intense in area

This is NZ, we shouldn't be trying to be some European city.

This is silly. We don't have the population to support this

We're just building for foreign investors

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be closer

Tell us why

100m

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Every city in the world has its character from its historic buildings. New Zealand has been to free and easy in throwing away our heritage.

We should be retaining much more heritage

How will future generations view what we are doing now.

We have a whole area of our history ignored.

Pre1944 bungalows and areas like WEstmere and Grey Lynn need protection. AS do the state housing areas. This is an important part of our heritage.

The Unitary Plan failed on this protection. This is the time to right that wrong.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

This has been too much of a rush....for what? Developers making profit.

Stop destroying what is genuinely grant about our cities.

I have seen some 4s that should be included in the character, others not so much. Then there are extra extraordinary individual houses in streets that have been developed that need protection

Remember DON'T THROW OUT THE BABY WITH THE BATHWATER

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I think more areas or parts of areas should be identified as a qualifying matter

Tell us why

Again individual buildings as well as areas need protection

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

The ground can not cope with absorbing rainwater when there is too much development and mature trees are not protected.

Fix the stormwater before there is more intensification or we'll have poos in our streams and sea.

There isn't the need for all this intensification without infrastructure

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

We need to protect ALL view shafts. This is the character of the city of volcanic cones and our Museum on the hill.

Iconic buildings in our centre are also important and some of the newer builds need to be added to the list as they too are an important part of our future and past

I wish to speak to my submission

Important privacy information

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#7011

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Barbara Chapman

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

None of St Marys Bay is within a walkable distance of 1200 meter to City Centre amenities which residents use. These include retail, entertainment facilities, rapid transit/public transport hubs. The walkable route to the City Centre beside the motorway is only suitable in daylight hours. It has no public lighting and is n unsafe environment. Other return routes from the City Centre to St Marys Bay involve steep grades unsuitable at night for the population cohorts of St Marys Bay.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

None of St Marys Bay is within a walkable distance of 1200 meter to City Centre amenities which residents use. These include retail, entertainment facilities, rapid transit/public transport hubs. The walkable route to the City Centre beside the motorway is only suitable in daylight hours. It has no public lighting and is n unsafe environment. Other return routes from the City Centre to St Marys Bay involve steep grades unsuitable at night for the population cohorts of St Marys Bay.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The closest rapid transport stop to St Marys Bay is Britomart or the future Victoria Street Station. Both are NOT within 800 meters of St Marys Bay.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

None of the St Marys Bay suburb is within 400 meters of the City Center. This means St Marys Bay is beyond the walkable catchment threshold.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Within St Marys Bay there are over 200 properties of historic heritage value rated 6 and 5. I support creating Special Character sub areas around clusters of heritage houses in St Marys Bay in addition to those identified on the draft maps.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

This technique should be expanded over the entire suburb of St Marys Bay collecting all houses of rating 6,5 and 4 as sub-areas of special character.

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

St Marys Bay has significant infrastructure constraints with stormwater, wastewater and the overall road network. The grading of the stormwater/wastewater system and the planned separation is based on the existing development capacity. Any proposed increase in residential density will not be accommodated in the proposed infrastructure upgrading.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

St Marys Bay is bounded to the north by an unstable former coastal edge which presents a coastal hazard that has not been considered as a qualifying matter as it should have been. This means that a suitable depth of protection is needed from the former coastal cliffs inland for at least 100 meters where intensification must be avoided to manage the hazard risk.

Important privacy information

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#7012

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Leanne Hackett (please do not use my name in any document

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

The walkable routes to the city centre from st Marys bay are unsafe and only suitable during daylight hours. I still have my wits about me during daylight hours! Other routes are steep inclines and steep, slippery stairwells, narrow walkways - not designed for increase in numbers of people using these access ways.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

With relevance to st Marys bay, there is no close transit stops - Brito mart or Victoria st station would be over 800m away.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

With relevance to st Marys bay, there is no close transit stops - Brito mart or Victoria st station would be over 800m away.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

If you took Ponsonby as our local centre, you would lose all the heritage and history of the area if within 400m you had high rise apartments. These older areas are known and regarded for their history and character, that's what makes the area special, down to the boutique style shopping. Ponsonby road sits on a ridge line and to have apartment style housing within 400m would only cast shadow lines over the rest of the community - creating darker, damper living. Not encouraging healthy living standards.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?**

Tell us why

If you took Ponsonby as our local centre, you would lose all the heritage and history of the area if within 400m you had high rise apartments. These older areas are known and regarded for their history and character, that's what makes the area special, down to the boutique style shopping. Ponsonby road sits on a ridge line and to have apartment style housing within 400m would only cast shadow lines over the rest of the community - creating darker, damper living. Not encouraging healthy living standards.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Without our history and our heritage - what are we? Why do you think the government is re-intruding te reo into our education system - because it is acknowledging it shouldn't have been wiped out in the first place. Do not wipe out our heritage homes, it is our history and the character of many local communities, these special homes cannot by re-instated as easily as a language, and as you'll agree a language is not so easy to pick up either. Don't make mistakes now, keep our heritage.

These special homes in our local area make it unique, don't spoil the character by knowing them down or putting apartment blocks next to them making them look out of place, in an area where the rightfully stand.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

And reviewing this to extend the special character areas

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

And review to extend to keep and maintain character of local areas

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater

infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Please don't get me started on this matter. St Marys bay, Herne bay already have so many issues regarding stormwater/waste water. The area barely copes with its current population, how to your consider intensifying the population in the area where our run off ends up in the hauraki gulf, polluting our food sources and making our local beaches unsafe to swim in after stormy weather. Please you are crippling the current infrastructure, and the proposed current infrastructure upgrade will not cope with further population intensification.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

As a general comment - please don't consider any intensification close to coastal areas, I would suggest a 100m at least, to avoid risk of unstable land, coastal cliffs, erosion, climate change, possible sea level risings etc.

With specific regard to st Marys bay, protection is needed from the former coastal cliffs to manage above listed potential risks.

Important privacy information

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#7017

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Oscar Sims

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be further

Tell us why

The catchment is insufficiently large and should be expanded. People are able to walk further than this and regularly do. I am a city centre resident and often walk 30 minutes or more multiple times a week.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be further

Tell us why

See above: the catchment is insufficiently large and should be expanded. People are able to walk further than this and regularly do.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be further

Tell us why

This walkable catchment is not even close to being large enough. 800 metres also rules out the possibility that people can make multimodal trips using cycling and micromobility in conjunction with rapid transit.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be further

Tell us why

The housing crisis in Auckland is extremely deep - we have a property market that is more overheated than even much larger cities like London or Sydney, already among the worst housing markets in the world. We need to enable as much development as possible in order to begin making a dent in the supply shortage. That starts by giving people more housing options in more areas. 400 metres is an extremely short distance; at least 800 metres would be a good start.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be further

Tell us why

We need more upzoning around town centres, which will allow more people to live in areas close to high amenity, facilitating mode shift to lower carbon transport options.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

Special character areas should not be a qualifying matter. 'Special character' is a made-up term & not the same thing as genuine heritage (which should be protected). SCAs should be excluded on a few important bases:

1. They will not pass legal scrutiny, and the Council will have to spend a large amount of ratepayer funds fighting legal battles in the courts.

2. They are not important. There is very little about Auckland's built environment that is worthy of preservation. Most of it is ugly, and many of the buildings in so-called special character areas are of low quality and unliveable. Creating legal protections for these building facilitates the oppression of low-income people at the hands of unscrupulous landlords and property managers. Nobody visits this country to look at 1970s weatherboard bungalows; they visit because of our beautiful natural landscapes and vibrant culture. We should protect these natural landscapes by ensuring Auckland does not continue to sprawl.

3. We will not have any future buildings of genuine outstanding heritage value if it is illegal to build any new buildings today.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

I do not support SCAs as a qualifying matter for the reasons stated above.

To the extent that SCAs remain a qualifying matter (a bad idea, as the council will get sued), they should be highly restricted compared to the proposed areas, with only small numbers of high quality period exemplars preserved. However this would not be a special character area, it would be heritage preservation, which is the actual policy that should be enacted instead.

We specifically need more dwellings in the proposed SCAs because these are the areas of the city closest to employment and amenity. Every square meter of additional SCAs is thousands of tons of CO2 emitted and millions of hours wasted in the decades to come by people having to commute for longer trips every day to get to work. The benefits of putting people's jobs and houses closer together are overwhelming when you stop and think about it.

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

I do not support SCAs as a qualifying matter for the reasons stated above.

To the extent that SCAs remain a qualifying matter (a bad idea, as the council will get sued), they should be highly restricted compared to the proposed areas, with only small numbers of high quality period exemplars preserved. However this would not be a special character area, it would be heritage preservation, which is the actual policy that should be enacted instead.

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Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Do not support

Tell us why

Just build more infrastructure. It is not difficult; we have been doing it for centuries. Artificially bidding up the price of housing because the council and government are derelicting their duty to cater to residents (real, living human beings) is a governance failure.

To quote the CFMH: "It is the responsibility of the NZ Government, Auckland Council and its CCOs to deliver infrastructure in anticipation of future housing growth. It may be reasonable to have extremely limited areas qualified where it is impossible or extremely difficult to address long-term infrastructure constraints. Wherever there is strong demand to live, and high accessibility, central

and local Government agencies should endeavour to address infrastructure constraints to support development."

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Please don't do restrictive qualifying matters because you will get sued, which will cost ratepayers a lot of money. Site by site evidence is required for qualifying matters, which includes justifying the extent of the area that it's applied to, as well as the sites that it applies to.

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Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Mary Mihaljevich

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

calculated from western edge rather than an average walk and as the crow flies rather than an actual walk. does not take into account topography is ponsonby and freemans bay. i walk regularly and this is not realistic

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

as above is not calculated accurately

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Other

Tell us why

do not support a one size fits all approach for auckland. design for individual communities and people

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

don’t support a one size fits all approach. doesn’t take into account unique needs of individual communities and historical areas

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be closer

Tell us why

meet the needs of people and individual communities and do not apply a blanket approach

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

we have so little historical areas in auckland- we need to protect these not destroy

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

st mary's bay one of the oldest and few historical areas we have left in auckland has not been included. we need to protect the history of auckland not destroy

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I think more areas or parts of areas should be identified as a qualifying matter

Tell us why

ponsonby, st mary's bay and freemans bay are significant historical areas we need to be protected not turned into soulless apartment blocks like hobson ridge

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

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- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

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#7043

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Anthony Church

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

Whilst the intensification close to centres make sense an indiscriminate rule will not account for preserving any heritage or character of the built environment and these buildings and sites will become fodder for developers to bowl and maximise return with low cost buildings that will make Auckland a developer and slum lords paradise at the expense of the residents. This is a lazy attempt at urban planning with a simplistic approach by politicians and makes a mockery of the unitary plan process and the experts and residents who were involved in the design for the intensification of Auckland already through the unitary plan.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

Whilst the intensification close to centres make sense an indiscriminate rule will not account for preserving any heritage or character of the built environment and these buildings and sites will become fodder for developers to bowl and maximise return with low cost buildings that will make Auckland a developer and slum lords paradise at the expense of the residents. This is a lazy attempt at urban planning with a simplistic approach by politicians and makes a mockery of the unitary plan process and the experts and residents who were involved in the design for the intensification of Auckland already through the unitary plan.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

Whilst the intensification close to centres make sense an indiscriminate rule will not account for preserving any heritage or character of the built environment and these buildings and sites will become fodder for developers to bowl and maximise return with low cost buildings that will make Auckland a developer and slum lords paradise at the expense of the residents. This is a lazy attempt at urban planning with a simplistic approach by politicians and makes a mockery of the unitary plan process and the experts and residents who were involved in the design for the intensification of Auckland already through the unitary plan.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre

(such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

Whilst the intensification close to centres make sense an indiscriminate rule will not account for preserving any heritage or character of the built environment and these buildings and sites will become fodder for developers to bowl and maximise return with low cost buildings that will make Auckland a developer and slum lords paradise at the expense of the residents. This is a lazy attempt at urban planning with a simplistic approach by politicians and makes a mockery of the unitary plan process and the experts and residents who were involved in the design for the intensification of Auckland already through the unitary plan.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be closer

Tell us why

Whilst the intensification close to centres make sense an indiscriminate rule will not account for preserving any heritage or character of the built environment and these buildings and sites will become fodder for developers to bowl and maximise return with low cost buildings that will make Auckland a developer and slum lords paradise at the expense of the residents. This is a lazy attempt at urban planning with a simplistic approach by politicians and makes a mockery of the unitary plan process and the experts and residents who were involved in the design for the intensification of Auckland already through the unitary plan.

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites

of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

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Special Character Areas

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

The government are idiots. Why would you not include special character to preserve the history of the city and make it a nice place to live.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

We don't have a housing shortage currently, we have an affordability crisis driven primarily by the historically low cost of money, and a number of other factors such as speculation and property investors. However in planning for the future there are many better areas to drive higher intensification as per the unitary plan, than destroying special character areas

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

There is frankly no way teh central suburbs infrastructure can support the density being proposed - Westmere and Meola Creek and most of the other waterways have no infrastructure to cope with increased waste and storm water runoff, not to mention roading, public transport, schools. Its madness and will end up as a complete cluster. And not providing parking when no public transport is available is moronic. Just go out to Hobsonville and see how that's working.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

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- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct

- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

All of these should be qualifying matters, along with coastal erosion areas - these should not have any higher density than already allowed for, and being able to block your neighbours natural light with the proposed HIRTB rules is criminal.

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#7046

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Melanie Pitto

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

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The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

Hardly any people in Auckland would walk 1200m to the city centre and 15 mins walking time is relative, especially when the walk of 1200m is mostly uphill. The suggested edge of the city centre is less relevant for the western side of Auckland as most shops and eg. one of the main employers, The University of Auckland, are located on the eastern side of Queen Street which is already about a 30mins walk from the Ponsonby area. In my opinion, there are two main reasons to go to the city centre: to work or to shop. More and more people are using other means (electric scooters, electric bikes eg) that allow them to cover greater distances and move within the city centre at a swift pace. A fast paced working life, unfortunately does not support 30+ mins of walking to and from work anymore if it is quicker and almost as green to take an electric vehicle and get back to the family earlier. Throughout the pandemic, flexible working hours have become more important and many people prefer to mostly work from home these days. Walking or better going for a walk on the weekend is different and usually, Aucklanders either go walking on the beach, in the bush, or at the shopping mall but no one would then walk 1200m to get home carrying lots of shopping bags. I am not against walking, on the contrary, I would love more people to walk in their free time and enjoy the (still) beautiful and characteristic corners of Auckland but I think to base intensification or where to build 6 storey buildings on a walkable distance from an almost purely commercial city centre is not the right approach as it would destroy characteristic areas in those catchment areas and make them less attractive. Rather then intensifying the western side of Auckland's city centre and disregarding the appeal of beautifully villa-lined streets with lots of trees, areas closer to town are more suitable for intensification as there are a lot of higher buildings already so no area character would suffer.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Other

Tell us why

This would probably be a more appropriate distance for walking. Why is the walkable catchment from the city centre different from the metropolitan centres?

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

I think there are (or will be) too many rapid transit stops to make them walkable catchment points so the closer the better to protect trees, characteristic houses, and quality of living.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** I don't know

Tell us why

Not sure whether 'large town centres' equal metropolitan centre.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Not familiar with what is classified as 'small town centre' or 'large local centre'.

Qualifying matters

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6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

Special places that are unidentified will get overlooked. As one of the most livable cities in the world, Auckland needs to protect its special character areas with old kauri villas, small windy streets, and lots of trees and green areas. Some of those areas might not be identified under the scheme for different reasons but that doesn't mean they can just be demolished and exchanged for soulless developer buildings. Auckland will just blur into just another big city and the face of the city and those disregarded areas will change for the worse. Oftentimes, the infrastructure in special character areas is unsuitable for intensification of this kind with small sections and difficult topography.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

Freemans Bay areas marked in red should be included as a qualifying matter because they are part of the suburb's history and contribute to the uniqueness, relevance and history of this place and Auckland in general. To exclude those areas will adversely affect the integrity of nearby high quality character areas and decrease the value and quality of life. Freemans Bay may be divided into a special character section and a section that does not have any special character buildings but that doesn't mean it doesn't have any historic relevance. Wood Street and Elizabeth Street e.g. have beautiful trees that add to the special character and climate urgency just as much.

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

It is most important to retain character and history of e.g. Ponsonby Road as it adds to a sense of place, belonging, community spirit and identity.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

It must be considered for safety reasons. Most special character areas present difficult access for fire brigades or ambulances e.g. High rise buildings increase the fire risk. Sewage is another issue that needs to be considered, too. Small streets are just not suitable for six story buildings and will also compromise privacy.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct

- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Climate Change and biodiversity. Considering the amount of trees and vegetation around the Freemans Bay/Ponsonby area this can't be disregarded. The greens would have to go and make space for high buildings. The tuis and wood pidgeons of Wood Street would not survive.

Important privacy information

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#7050

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Blair Chapman

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

None of St Marys Bay is within a walkable distance of 1200 meters to the City Centre amenities which residents use. These include retail, entertainment facilities, rapid transit / public transit hubs. The walkable route to the city beside the motorway is only suitable during daylight hours. There is no public lighting and it's unsafe. Other routes are steep and unsuitable for the St Marys Bay population cohort.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

None of St Marys Bay is within a walkable distance of 1200 meters to the City Centre amenities which residents use. These include retail, entertainment facilities, rapid transit / public transit hubs. The walkable route to the city beside the motorway is only suitable during daylight hours. There is no public lighting and it's unsafe. Other routes are steep and unsuitable for the St Marys Bay population cohort.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The closest rapid transport stop to St Marys Bay is Britomart or the future Victoria Street Station. Both are NOT within 800 meters of St Marys Bay.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

None of the St Marys Bay suburb is within 400 meters of the City Center. This means St Marys Bay is beyond the walkable catchment threshold.

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Within St Marys Bay there are over 200 properties of historic heritage value rated 5 or 6. I support creating Special Character sub-areas around clusters in heritage houses in St Marys Bay in addition to those identified on the draft maps.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

This technique should be expanded over the entire St Marys Bay suburb collecting all houses of Rating 6, 5 and 4 as sub-areas of special character.

8. **What do you think of the proposed business special character areas that we have identified?** I don't know

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

St Marys Bay has significant infrastructure constraints with stormwater, waste water and the roading network. An increase in residential density will not be accommodated in the the proposed infrastructure upgrading.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

The coastal edge presents a coastal hazard that must be considered. A suitable depth of protection of 100m from the coastline must be considered.

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#7052

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Stephen Donoghue-Cox

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

None of St Marys Bay is within a walkable distance of 1200 metres to City Centre amenities which residents use. These include retail, entertainment facilities, rapid transit/public transport hubs.

The walkable route to the City Centre beside the motorway, is only suitable in daylight hours. It has no public lighting and is an unsafe environment. Other return routes from the City Centre to St Marys Bay involve steep grades, unsuitable at night for the population cohorts of St Marys Bay.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

The closest rapid transit stop to St Marys Bay is Britomart or the future Victoria Street station. Both are not within 800 metres of St Marys Bay.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The closest rapid transit stop to St Marys Bay is Britomart or the future Victoria Street station. Both are not within 800 metres of St Marys Bay.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be closer

Tell us why

None of the St Marys Bay suburb is within 400 metres of the City Centre. This means St Mary's Bay is beyond the walkable catchment threshold.

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5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?**

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more)

within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Within St Marys Bay there are over 200 properties of historic heritage value rated 6 and 5. I support creating Special Character Sub-Areas around clusters of heritage houses in St Marys Bay in addition to those identified on the draft maps.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

Within St Marys Bay there are over 200 properties of historic heritage value rated 6 and 5. I support creating Special Character Sub-Areas around clusters of heritage houses in St Marys Bay in addition to those identified on the draft maps.

8. **What do you think of the proposed business special character areas that we have identified?**

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

St Marys Bay has significant infrastructure constraints with stormwater, wastewater and the overall road network. The upgrading of the stormwater/wastewater system and the planned separation is based on the existing development capacity. Any proposed increase in residential density will not be accommodated in the proposed infrastructure upgrading.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. **Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)**

Important privacy information

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#7065

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Anna Breckon

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** I don't know

Tell us why

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** I don't know

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** I don't know

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** I don't know

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** I don't know

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

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The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

Auckland must preserve its cohesive heritage streetscapes, which are worth more than the sum of their parts and make our city distinctive.

7. **What do you think of the proposed residential special character areas that we have identified?** Support

Tell us why

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** I don't know

Tell us why

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

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- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

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#7066

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Sally Morris

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

From what I have seen, living in Freemans Bay for 15+ years, people don't typically walk to the city centre from here. It's not generally appealing, because to do so requires walking up and down steep inclines and along busy, noisy roads which lack shade cover - such as Victoria, Wellesley and Fanshawe Sts.

To achieve a more pleasant walk requires taking a longer route around the waterfront, which unfortunately also lacks shade cover. It's much more typical for people to walk distances of up to 500 metres - for example from home to a close workplace, the supermarket, a local park or to Ponsonby Rd.

The Council's stated assumption that a larger walkable catchment of 1200m from the edge of the city centre is warranted because the centre has the most jobs, activities and amenities seems somewhat flawed.

With regard to jobs and activities, the central city's retail and wider commercial heart has been severely adversely affected by the Covid-19 pandemic. Large corporates, smaller commercial businesses and other organisations are increasingly supporting employees to work from home. What began as short term solutions related to the pandemic are becoming longer term changes in the way organisations work, now that it is widely recognised that people can and do work happily and successfully from home on a regular basis. This will have a broad reaching longer term effect in leasing of commercial buildings. There are already widespread and increasing office and retail space vacancies. A potential silver lining of this for the wider Auckland community is that there are already large buildings, street scapes, community spaces and transport solutions available in the city centre that would suit redevelopment for intensified housing purposes; in a significantly more complementary way than the Council's current draft proposal. Much kinder to the environment too, and more closely aligned to the commitment to reduce greenhouse gases by 50% by 2030. That represents a very ambitious goal to be achieved in less than 8 years from now. Much more likely to be achievable by initiatives like redeveloping existing buildings in the city centre, than by completely removing existing buildings and gardens en masse and constructing much larger buildings from scratch, with overall less green space for encouraging and protecting bees and other insects, birdlife, etc.

With regard to walkable catchment in relation to amenities, the location of important city amenities such as Auckland Library and Art Gallery, AUT, the University and the Museum, are all well over 2km from Freemans Bay and St Marys Bay....So not even within the proposed 1200m walkable catchment, never mind a more realistic 500m closer option.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

I think up to 500m is more realistic as a distance people are likely to regularly walk.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

I think up to 500m is more realistic as a distance people are likely to regularly walk.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

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Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** I don't know

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Do not support - I think it should be further

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites

of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

Aotearoa NZ is a nation that is increasingly becoming more aware of and respecting the past, and how it relates to now and the future. The more that is removed of the built environment aspects of the past, the less that future generations will be able to understand and appreciate the links. There are not many spacial character areas left in Auckland, and I think it's very important to retain what we have.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

Both South and North Freemans Bay are of equal value in retaining what is left of built special character areas in Auckland. There are many special, historically significant buildings in both. Owners have nurtured these over the years so they can be preserved for generations to come. Refer D17 in the proposal information, Historic Heritage.

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Crucial to retain areas with a sense of the city's older built history, to inform people's understanding of the past and decisions for the future.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

It is widely recognised that the current stormwater and sewage capacity for Freemans Bay and nearby suburbs is not sufficient. The cost of upgrading it to the extent that would be needed for thousands of additional residents in the area would be prohibitive. What about the impact on the Hauraki Gulf Marine Park? Who would meet this cost and when? Power and internet are still above ground in several streets. How would this be resolved in streets with significant new, intensified housing? How would it be funded and when would it happen? Where would thousands of new residents park their cars? How will emergency vehicles get through when needed? (Many streets and footpaths are very narrow, as they were originally built for horses, not cars and larger vehicles). How would the huge cranes, pile drivers, diggers, etc needed for large housing developments get through? It would be very different and more costly to achieve these types of developments in an area like this, compared to green fields developments or areas with larger existing sites, more favourable topography and wider streets.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Regarding Freemans Bay, what about environmental concerns? Demolishing an existing suburb including its gardens, to be replaced by rows of tall concrete structures, is not at all going to help protect the city's natural environment and reduce its greenhouse gases. In fact quite the opposite. In addition, with the hilly nature of the suburb combined with mostly small narrow sites and narrow streets, tall buildings will create significant shading and wind tunnels, creating an unpleasant living environment. Also, where will thousands of additional residents go for open, green space? Local parks are small, and the larger Victoria Park and Wynyard Quarter areas would soon become overwhelmed.

With reference to D14 Volcanic View Shafts in the proposal information, groupings of tall buildings in Freemans Bay would significantly obscure views to Rangitoto from the Ponsonby ridge.

Important privacy information

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#7088

Government's new housing rules: What it means for Auckland

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Graeme Edwards

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

The city centre walkable catchment is measured from the edge of the city centre. The Auckland city centre is a large area, which means that the effective walking distance required to reach a destination (work, shops, entertainment venues, train station, etc.) on average is likely to much greater than 1200 metres. For a transitional zone immediately inside the edge of the city centre, there are few public amenities, shops and other similar destinations. It takes approximately 30 minutes to walk across the middle of the city centre area from north to south (Drake Street to The Strand). Adding 50% of that to the walkable catchment time (which is a realistic on average estimate for the required walking time from the edge of the city centre to the destination) means that the total walk time for the city centre walkable catchment blows out to at least 30 minutes. At that point, the capability and willingness of people to walk is limited and many will need, or choose, to use transport options (Link bus, Uber etc.) rather than walk.

The effect is, therefore, that the balance of the intended benefits and detriments of significant intensification within walkable catchments becomes mis-aligned, because it is based on an erroneous and/or unreasonable assumption about people's capability and willingness to walk to the city centre. For that reason, the walkable catchment for the city centre should be no more than 800 metres (i.e. ~10 minutes), which is consistent with the walkable catchment for metropolitan centres. Even on that modified basis, the on average effective walk time to destination will be 20-25 minutes, which is at the outer end of, if not over, what is reasonable.

Please see attachment A

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?**

Tell us why

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?**

Tell us why

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?**

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?**

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

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Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more)

within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

I strongly support the inclusion of residential and business special character areas as a qualifying matter, subject to the following comments:

I acknowledge that the objectives of the NPS-UD are important. The statutory framework, however, recognises that good urban development requires balancing many relevant and sometimes competing factors, and permits Council to make height or density requirements less enabling of development within an area to the extent necessary to accommodate a matter that makes higher density development inappropriate in that area. It is good to see that Council appears to be appropriately aware of and responsive to the significant historical, cultural, physical and visual values of special character areas in Auckland. The protection of special character areas will have a negligible (if any) effect on achievement of the objectives of NPS-UD and therefore reasonably should be ensured by Council when applying the statutory framework. Council is to be commended for its recognition of the need to protect special character areas.

Within the constraints of the statutory framework, a reasonable methodology must be used to assess whether a special character area is included as a qualifying matter. The "high quality special character area" designation is an appropriate description for the relevant threshold. For the reasons set out below, however, the methodology that has been used to define "high quality" needs to be enhanced to fully and reasonably take into account all characteristics that make higher density inappropriate in an area. A lot of work was done when the Unitary Plan was developed to identify special character areas requiring protection. If those areas are to be further reduced by now applying a "high quality" special character filter, then it is incumbent on Council to fully and reasonably assess all special character areas against the relevant special character values. In particular:

1. Overall contributions to high quality special character

The current methodology to determine whether a special character area is of high quality relies overly and unreasonably on the site-specific analysis. Subject to my comments in 2 below, the 6 point site-specific scale itself appears to be generally reasonable to evaluate contribution to special character values on a site by site basis, as required by section 77L(c). That 6 point scale, however, does not fully and reasonably assess the quality of special character values of an area overall. To comply with section 77L, the evaluation report must include a site-specific analysis in accordance with section 77L(c). The site-specific analysis is not the exclusive tool, and Council reasonably must also take into account other characteristics that justify why higher density development is inappropriate in light of the national significance of urban development and the objectives of the NPS-UD. In the case of special character areas, the evaluation of high quality

special character necessarily must include an overall assessment of the area against the relevant special character values, in addition to the site-specific analysis.

To illustrate my point, I will refer to Freemans Bay south. Notwithstanding that the area exceeds the 75% threshold based on the site-specific analysis, and therefore has been assessed to be a high quality special character area and a qualifying matter, there are additional characteristics that reasonably must be taken into account by Council as part of its evaluation of the quality of the special character of Freemans Bay south. Those additional characteristics support and enhance the case to protect Freemans Bay south as a high quality special character area. Some or all of those additional characteristics also might be relevant to the evaluation of other special character areas. In particular:

(a) Several area-wide characteristics strongly support the relevant special character values for Freemans Bay south, as set out in Schedule 15 of the Unitary Plan. The special character area statement for Freemans Bay includes the following:

The area collectively reflects an important aspect, or is representative, of a significant period and pattern of community development within the region or locality.

The area collectively reflects important or representative buildings, types, designs, styles, methods of construction, materials and craftsmanship, urban patterns, landscape, and streetscape qualities.

The special character values are far more than only built form values that are discernible from site-specific analysis. To properly and reasonably assess an area, in addition to site-specific analysis, Council must "stand-back" and consider also the overall collective contribution of the area to the special character values. Freemans Bay south is unique in that it provides a living window into the longitudinal development of Auckland from the latter part of the 19th century. This includes not only the important Victorian and Edwardian era development, but also social, cultural and physical history related to the proposed clearance of the area in the 1960s, the establishment of the Freemans Bay-Ponsonby Planning Association in 1971, the successful overturning of the clearance designation in 1973, and the subsequent restoration and rejuvenation of the Freemans Bay catchment, including the erection in the 1970s and 1980s of terraced houses and single dwellings on sites that had been cleared, and more recent refurbishment of older villas.

(b) The site-specific analysis does not take into account the unique urban structure of Freemans Bay south, including the following:

- Residential subdivision: Freemans Bay south is an outstanding example of late 19th century small section residential subdivision. Average lot size is ~300m2. Most individual sections are unsuitable on their own for higher density development. It follows, therefore, that permitting higher density development in the area will drive developers to aggregate smaller lots on which to build multi-unit dwellings. That will destroy the historic subdivision character values of the area overall;

- Road pattern and streetscape: Freemans Bay south is an outstanding example of the development of urban planning in the late 19th century, which included the introduction of wider streets that permitted grass berms and extensive kerbside tree planting. Freemans Bay south, as an area overall, shows the evolution of urban planning from narrow streets (e.g. Heke Street) to

wider carriageways with berms and trees (e.g. Collingwood Street and Anglesea Street). The area collectively demonstrates consistency of lot size, setback, spacing and rhythm of housing. Any one high density development in the area will significantly undermine the collective, established streetscape qualities that contribute to the special character values of the area overall.

(c) The site-specific analysis also does not take into consideration post-war developments that significantly contribute to the pattern of community development within Freemans Bay south. For example, there is important historical, cultural and visual character relating to the architectural heritage spawned by several young and influential architects in Freemans Bay in the 1970s, including Malcolm Walker, Pip Cheshire, David Mitchell, Nick Stanish, Russell Withers, Claude Megson, and Pete Bossley. In Freemans Bay south there are houses built by Stout-Mitchell (Heke Street), Nick Stanish (Picton Street) and Pete Bossley (Paget Street) which are not rated 5 or 6 on the site-specific analysis scale but which are important links to the social and cultural development of Freemans Bay south, and contribute to its overall special character.

(d) Freemans Bay is the only inner west suburb that is both clearly visible and easily accessible from the lower city centre. It provides a walkable heritage corridor between the lower city centre or Wynyard Quarter and the centre of the Ponsonby Road entertainment and shopping precinct. That corridor, in its current form, has significant public amenity and tourism value. The physical and visual qualities of Freemans Bay (in particular the urban patterns, landscape and streetscape qualities) also must be considered in those contexts and reflected in the assessment of the quality of special character of the area overall.

(e) The special character values of Freemans Bay also include the way it complements and supports the special character of the Ponsonby Road business area, which has been identified as having both historical significance and significance for its physical and visual qualities, and the potential to be of significance as an historic heritage area. The Ponsonby Road business area has a dominant position along the ridgeline that is clearly visible from most parts of the north and west of the city centre – any significant development in Freemans Bay would have a major adverse impact on the urban patterns, landscape and streetscape qualities of the Ponsonby Road business area, especially when viewed from the city centre. See also my answer to Q8. The evaluation of the quality of the special character of Freemans Bay should take into account its significant situational support for the special character of the Ponsonby Road business area.

In summary, including an overall "stand back" assessment, in addition to the site-specific analysis, is necessary to ensure that area-wide characteristics are properly and reasonably accounted for. The special character of Freemans Bay south is greater than the sum of its individual plots.

2. Positive contribution to special character by some otherwise non-contributing sites

The site-specific analysis for the purpose of assessing high quality special character should include consideration of each site's impact on adjacent and other close by sites, where that is relevant for the qualifying matter. For example, the assessment of a post-war single dwelling on a property that is adjacent to several older villas with scores of 5 or 6, should reflect the role played by that post-war property in protecting the visual qualities of the adjacent properties and/or supporting the special character of the area overall. The site-specific analysis for the purpose of section 77L does not need to be limited to features that are physically present on the particular

site. It may (and reasonably must) take into account the site's relevance and contribution to the physical and visual qualities of neighbouring sites and the special character values of the area overall.

There are at least two ways in which that consideration easily could be reflected in the site-specific analysis:

(a) The threshold for special character areas within walkable catchments to be assessed as high quality should be set at 66%, the same at that proposed for other special character areas. This would appropriately recognise that planning rules for special character areas to date have limited development on sites that surround character defining properties. Accordingly, it is reasonable to assume, and self-evident from the site-specific analysis itself, that those post-war properties themselves play an important role in supporting the special character values of the older properties and the area overall by acting as a buffer against otherwise adverse effects on the visual qualities of character defining sites.

(b) Alternatively, Council should count, for the purposes of the 75% threshold for high quality special character areas within walkable catchments, individual properties that are assessed to positively influence and/or protect the special character values of other sites (for example, sites that score 3 or 4 points). Those properties co-exist empathetically amongst a concentration of other properties that define or strongly support special character, so as to protect the special character of those other properties and the area overall. This proposed enhancement would appropriately and reasonably reflect the role played by some post-war single dwellings that are interspersed amongst older homes, and therefore contribute collectively to the special character of both the older homes individually and the area overall. The enhanced rule should be subject to properties that define or strongly support special character (i.e. properties that score 5 and 6 points) collectively exceeding the minimum 66% threshold applicable to areas outside walkable catchments.

In either scenario, therefore, at least 2 out of every 3 houses still must meet the special character physical qualities for the area, while the supplemental sites contribute positively to the special character qualities of the surrounding sites containing older properties, and the area overall.

3. Other site-specific contributions to special character

In addition to the role played by some post war properties that I have described in 2 above, some of those properties also have, in their own right, additional social or cultural value that contributes to the special character values of the area overall. For example, the properties that I have mentioned in 1(c) above all contribute significantly to the demonstration of the pattern of community development within Freemans Bay south. Maintaining the integrity of those properties sited amongst older homes is essential to the historic qualities of Freemans Bay south and is of high relevance and importance to the cultural history of Auckland generally. Those properties, in their own right, justify a special recognition overlay as part of their site-specific analysis score, to reflect their role in defining the special character values of Freemans Bay south.

4. Impact on housing supply capacity and the objectives of NPS-UD

Special character areas as a qualifying matter, with or without the enhancements that I have proposed in 1. to 3. above, will have a negligible (if any) effect on capacity for additional housing

supply. Special character areas in total represent only ~3% of total housing stock [ref: Auckland Council webinar: Online Information Session: Special Character Areas, 21 April 2022]. That is before the "high quality" filter is applied and before any potential off-sets to permit additional, more lenient, intensification that are available elsewhere (for example, on greenfield sites). There are several areas in Auckland, including areas adjacent to mass transit, that comfortably could sustain greater intensification which is more than sufficient to off-set any effect on potential capacity from maintaining special character areas as a qualifying matter.

The objectives of the NPS-UD are important. Those objectives, however, must be pursued reasonably within the statutory framework. The protection of special character values also is important and is enabled by the statutory framework. The balance between appropriately protecting special character values and allowing intensification in special character areas, strongly favours protection. The permanent, adverse consequences of failing to protect special character areas overwhelmingly outweighs the negligible (if any) impact on achievement of the objectives of the NPS-UD.

The impact of planning changes must be considered over the long term. Aucklanders fought successfully to preserve western city-fringe special character in the 1970s. Today we are thanking them for their efforts. Protection of those special character values was reinforced by the Unitary Plan. We are custodians of our heritage for future generations and do not want our current Councillors to take short term decisions which are unnecessary to achieve the objectives of the NPS-UD and would undo the long term historic, social and cultural benefits hard-won by our forebears. Such decisions are substantially irreversible and would put at risk the important heritage of our city for all future generations.

Please see attachment A

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

I believe that there is a small number of special character areas which currently are not assessed to be of high quality but which, when assessed against the additional criteria that I have suggested in my answer to Q6 should be applied in addition to or as part of the site-specific analysis, would be determined to be high quality special character areas. One such area is Freemans Bay north. While acknowledging Council's identification of sub-areas within Freemans Bay north that are to be recognised as high quality special character areas, the evaluation of the central neighbourhood around Arthur, Wood and Elizabeth Streets fails to take proper and reasonable account of the additional characteristics that, for the reasons set out in my answer to Q6, contribute collectively and materially to the quality of the special character of an area overall. Of particular concern is the failure to recognise within central Freemans Bay north:

(a) the role played by post-war properties in protecting the visual qualities of the adjacent Victorian and Edwardian properties and/or supporting the special character of the area overall; and

(b) the potential impact on the special character values of the Ponsonby Road business area, including the Ponsonby Road ridgeline when viewed from the city centre, of any high density development in the central neighbourhood of Freemans Bay north. The Ponsonby Road business area did not develop and thrive in isolation from its surrounding community. Despite the attractive simplicity of relying only on the site-specific analysis, doing so fails to properly recognise and account for the inter-relationship between the two adjacent areas and therefore has the potential to both overlook the special character values of Freemans Bay north and materially adversely affect the special character values of the Ponsonby Road business area.

Please see attachment A

8. **What do you think of the proposed business special character areas that we have identified?** Support

Tell us why

Please see attachment A

I strongly support the proposed business special character designation for the Ponsonby Road business area. The Ponsonby Road business area demonstrates both significant historic qualities and significant physical and visual qualities. Firstly, it has played an important part in the development of Auckland from its pre-colonial roots to New Zealand's major metropolitan centre. That history can be told and seen by reference to the Ponsonby Road ridgeline and surrounds. Secondly, it is an outstanding example of a traditional suburban main shopping street. It has retained overall its physical and visual special character, with more recent buildings being generally supportive of the heritage values. It has a dominant position along the ridgeline which is clearly visible from most parts of the north and west of the city centre – any significant development along Ponsonby Road (or in Freemans Bay to the east of the ridgeline) would have a major adverse effect on the urban patterns, landscape and streetscape qualities of the entire inner west catchment, especially when viewed from the city centre.

Notwithstanding that the Ponsonby Road business area has been identified as a qualifying matter under Council's current assessment methodology, that methodology suffers from many of the same limitations as those highlighted in my answer to Q6 with respect to the determination of high quality residential special character areas. In particular, identification of business special character areas as a qualifying matter relies unduly and unreasonably on the site-specific analysis and should include also an overall assessment of the area against the relevant special character values.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater

infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

Please see attachment A

I strongly support the proposal to limit development where there is inadequate infrastructure to support it. This additional qualifying matter is reasonably necessary to:

(a) Appropriately and realistically recognise the impact on overall public amenity, health and safety due to infrastructure constraints; and

(b) Facilitate controlled, planned and orderly infrastructure expenditure by Council.

It will be important to apply an appropriately effective definition of constraining infrastructure for the purposes of the qualifying matter. In particular, in addition to obvious characteristics such as the capacity of waste water, storm water, and other utility services to cope with intensification, the definition should include physical and topographical constraints on intensive residential or business occupation that would have an overall adverse impact on public amenity, health or safety. Those constraints would include narrow streets that limit both amenity and appropriate access by emergency and other services – for example the nature and extent of fire service access required for a multi-story apartment block is vastly different from that required for a single dwelling. There would be an unacceptable risk to human safety and property if the necessary emergency services are unable to easily access a property. Similarly, the capacity of roading to reasonably and safely cope with the significantly increased traffic flows related to deliveries and trades services, and the scale of rubbish, recycling and other Council services that will be required by highly intensive development, should be assessed as part of this qualifying matter.

Many infrastructure constraints will be cumulative – by which I mean that existing infrastructure might be able to cope with the first high intensity development but it becomes increasingly vulnerable with each subsequent development. Planning rules should not permit a "first come, first served" outcome which would deliver the worst of all choices – one or two high intensity developments that are out-of-place or "stranded" in otherwise low intensity areas, and which neither support the development of intensive urban hubs because they are sub-scale, nor sit comfortably within the surrounding community and built environment. If it is reasonably

foreseeable that infrastructure limitations might constrain development in an area at any point in the medium to long term, then that area should be a qualifying matter from the outset.

In relation to Freemans Bay:

(a) I understand that there are long-term significant limitations on the waste water and storm water infrastructure to be able to cope with any material intensification. I understand that the capacity of the waste water / storm water separation project is based on the current zoning of the area. I also understand that Freemans Bay will not be connected to the Central Interceptor. Accordingly, it is reasonably foreseeable that the existing water infrastructure will not cope with residential intensification in any part of Freemans Bay.

(b) The several narrow streets (including Arthur Street and Wood Street) clearly are unsuitable to service high density development.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Important privacy information

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Attachment A
This attachment forms part of my response to Auckland Council's invitation to provide feedback on *Government's new housing rules: what it means for Auckland*, May 2022

Q1 What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?
A Do not support – I think it should be closer.

The city centre walkable catchment is measured from the edge of the city centre. The Auckland city centre is a large area, which means that the effective walking distance required to reach a destination (work, shops, entertainment venues, train station, etc.) on average is likely to much greater than 1200 metres. For a transitional zone immediately inside the edge of the city centre, there are few public amenities, shops and other similar destinations. It takes approximately 30 minutes to walk across the middle of the city centre area from north to south (Drake Street to The Strand). Adding 50% of that to the walkable catchment time (which is a realistic on average estimate for the required walking time from the edge of the city centre to the destination) means that the total walk time for the city centre walkable catchment blows out to at least 30 minutes. At that point, the capability and willingness of people to walk is limited and many will need, or choose, to use transport options (Link bus, Uber etc.) rather than walk.

The effect is, therefore, that the balance of the intended benefits and detriments of significant intensification within walkable catchments becomes mis-aligned, because it is based on an erroneous and/or unreasonable assumption about people's capability and willingness to walk to the city centre. For that reason, the walkable catchment for the city centre should be no more than 800 metres (i.e. ~10 minutes), which is consistent with the walkable catchment for metropolitan centres. Even on that modified basis, the on average effective walk time to destination will be 20-25 minutes, which is at the outer end of, if not over, what is reasonable.

Q6 What do you think of our proposal to include identified special character areas as a qualifying matter?
A Support – subject to my comments below

I strongly support the inclusion of residential and business special character areas as a qualifying matter, subject to the following comments:

I acknowledge that the objectives of the NPS-UD are important. The statutory framework, however, recognises that good urban development requires balancing many relevant and sometimes competing factors, and permits Council to make height or density requirements less enabling of development within an area to the extent necessary to accommodate a matter that makes higher density development inappropriate in that area. It is good to see that Council appears to be appropriately aware of and responsive to the significant historical, cultural, physical and visual values of special character areas in Auckland. The protection of special character areas will have a negligible (if any) effect on achievement of the objectives of NPS-UD and therefore reasonably should be ensured by Council when applying the statutory framework. Council is to be commended for its recognition of the need to protect special character areas.

Within the constraints of the statutory framework, a reasonable methodology must be used to assess whether a special character area is included as a qualifying matter. The "high quality special character area" designation is an appropriate description for the relevant threshold. For the reasons set out below, however, the methodology that has been used to define "high quality" needs to be enhanced to fully and reasonably take into account all characteristics that make higher density inappropriate in an area. A lot of work was done when the Unitary Plan was developed to identify special character areas requiring protection. If those areas are to be further reduced by now applying a "high quality" special character filter, then it is incumbent on Council to fully and reasonably assess all special character areas against the relevant special character values. In particular:

1. Overall contributions to high quality special character

The current methodology to determine whether a special character area is of high quality relies overly and unreasonably on the site-specific analysis. Subject to my comments in 2 below, the 6 point site-specific scale itself appears to be generally reasonable to evaluate contribution to special character values on a site by site basis, as required by section 77L(c). That 6 point scale, however, does not fully and reasonably assess the quality of special character values of an area overall. To comply with section 77L, the evaluation report must ***include*** a site-specific analysis in accordance with section 77L(c). The site-specific analysis is not the exclusive tool, and Council reasonably must also take into account other characteristics that justify why higher density development is inappropriate in light of the national significance of urban development and the objectives of the NPS-UD. In the case of special character areas, the evaluation of high quality special character necessarily must include an overall assessment of the area against the relevant special character values, in addition to the site-specific analysis.

To illustrate my point, I will refer to Freemans Bay south. Notwithstanding that the area exceeds the 75% threshold based on the site-specific analysis, and therefore has been assessed to be a high quality special character area and a qualifying matter, there are additional characteristics that reasonably must be taken into account by Council as part of its evaluation of the quality of the special character of Freemans Bay south. Those additional characteristics support and enhance the case to protect Freemans Bay south as a high quality special character area. Some or all of those additional characteristics also might be relevant to the evaluation of other special character areas. In particular:

(a) Several area-wide characteristics strongly support the relevant special character values for Freemans Bay south, as set out in Schedule 15 of the Unitary Plan. The special character area statement for Freemans Bay includes the following:

The area collectively reflects an important aspect, or is representative, of a significant period and pattern of community development within the region or locality.

The area collectively reflects important or representative buildings, types, designs, styles, methods of construction, materials and craftsmanship, urban patterns, landscape, and streetscape qualities.

The special character values are far more than only built form values that are discernible from site-specific analysis. To properly and reasonably assess an area, in addition to site-specific analysis, Council must "stand-back" and consider also the overall collective contribution of the area to the special character values. Freemans Bay south is unique in that it provides a living window into the longitudinal development of Auckland from the latter part of the 19th century.

This includes not only the important Victorian and Edwardian era development, but also social, cultural and physical history related to the proposed clearance of the area in the 1960s, the establishment of the Freemans Bay-Ponsonby Planning Association in 1971, the successful overturning of the clearance designation in 1973, and the subsequent restoration and rejuvenation of the Freemans Bay catchment, including the erection in the 1970s and 1980s of terraced houses and single dwellings on sites that had been cleared, and more recent refurbishment of older villas.

(b) The site-specific analysis does not take into account the unique urban structure of Freemans Bay south, including the following:

- *Residential subdivision:* Freemans Bay south is an outstanding example of late 19th century small section residential subdivision. Average lot size is ~300m^2. Most individual sections are unsuitable on their own for higher density development. It follows, therefore, that permitting higher density development in the area will drive developers to aggregate smaller lots on which to build multi-unit dwellings. That will destroy the historic subdivision character values of the area overall;
- *Road pattern and streetscape:* Freemans Bay south is an outstanding example of the development of urban planning in the late 19th century, which included the introduction of wider streets that permitted grass berms and extensive kerbside tree planting. Freemans Bay south, as an area overall, shows the evolution of urban planning from narrow streets (e.g. Heke Street) to wider carriageways with berms and trees (e.g. Collingwood Street and Anglesea Street). The area collectively demonstrates consistency of lot size, setback, spacing and rhythm of housing. Any one high density development in the area will significantly undermine the collective, established streetscape qualities that contribute to the special character values of the area overall.

(c) The site-specific analysis also does not take into consideration post-war developments that significantly contribute to the pattern of community development within Freemans Bay south. For example, there is important historical, cultural and visual character relating to the architectural heritage spawned by several young and influential architects in Freemans Bay in the 1970s, including Malcolm Walker, Pip Cheshire, David Mitchell, Nick Stanish, Russell Withers, Claude Megson, and Pete Bossley. In Freemans Bay south there are houses built by Stout-Mitchell (Heke Street), Nick Stanish (Picton Street) and Pete Bossley (Paget Street) which are not rated 5 or 6 on the site-specific analysis scale but which are important links to the social and cultural development of Freemans Bay south, and contribute to its overall special character.

(d) Freemans Bay is the only inner west suburb that is both clearly visible and easily accessible from the lower city centre. It provides a walkable heritage corridor between the lower city centre or Wynyard Quarter and the centre of the Ponsonby Road entertainment and shopping precinct. That corridor, in its current form, has significant public amenity and tourism value. The physical and visual qualities of Freemans Bay (in particular the urban patterns, landscape and streetscape qualities) also must be considered in those contexts and reflected in the assessment of the quality of special character of the area overall.

(e) The special character values of Freemans Bay also include the way it complements and supports the special character of the Ponsonby Road business area, which has been identified as having both historical significance and significance for its physical and visual qualities, and the potential

to be of significance as an historic heritage area. The Ponsonby Road business area has a dominant position along the ridgeline that is clearly visible from most parts of the north and west of the city centre – any significant development in Freemans Bay would have a major adverse impact on the urban patterns, landscape and streetscape qualities of the Ponsonby Road business area, especially when viewed from the city centre. See also my answer to Q8. The evaluation of the quality of the special character of Freemans Bay should take into account its significant situational support for the special character of the Ponsonby Road business area.

In summary, including an overall "stand back" assessment, in addition to the site-specific analysis, is necessary to ensure that area-wide characteristics are properly and reasonably accounted for. ***The special character of Freemans Bay south is greater than the sum of its individual plots.***

2. Positive contribution to special character by some otherwise non-contributing sites

The site-specific analysis for the purpose of assessing high quality special character should include consideration of each site's impact on adjacent and other close by sites, where that is relevant for the qualifying matter. For example, the assessment of a post-war single dwelling on a property that is adjacent to several older villas with scores of 5 or 6, should reflect the role played by that post-war property in protecting the visual qualities of the adjacent properties and/or supporting the special character of the area overall. The site-specific analysis for the purpose of section 77L does not need to be limited to features that are physically present on the particular site. It may (and reasonably must) take into account the site's relevance and contribution to the physical and visual qualities of neighbouring sites and the special character values of the area overall.

There are at least two ways in which that consideration easily could be reflected in the site-specific analysis:

(a) The threshold for special character areas within walkable catchments to be assessed as high quality should be set at 66%, the same at that proposed for other special character areas. This would appropriately recognise that planning rules for special character areas to date have limited development on sites that surround character defining properties. Accordingly, it is reasonable to assume, and self-evident from the site-specific analysis itself, that those post-war properties themselves play an important role in supporting the special character values of the older properties and the area overall by acting as a buffer against otherwise adverse effects on the visual qualities of character defining sites.

(b) Alternatively, Council should count, for the purposes of the 75% threshold for high quality special character areas within walkable catchments, individual properties that are assessed to positively influence and/or protect the special character values of other sites (for example, sites that score 3 or 4 points). Those properties co-exist empathetically amongst a concentration of other properties that define or strongly support special character, so as to protect the special character of those other properties and the area overall. This proposed enhancement would appropriately and reasonably reflect the role played by some post-war single dwellings that are interspersed amongst older homes, and therefore contribute collectively to the special character of both the older homes individually and the area overall. The enhanced rule should be subject to properties that define or strongly support special character (i.e. properties that score 5 and 6 points) collectively exceeding the minimum 66% threshold applicable to areas outside walkable catchments.

In either scenario, therefore, at least 2 out of every 3 houses still must meet the special character physical qualities for the area, while the supplemental sites contribute positively to the special character qualities of the surrounding sites containing older properties, and the area overall.

3. Other site-specific contributions to special character

In addition to the role played by some post war properties that I have described in 2 above, some of those properties also have, in their own right, additional social or cultural value that contributes to the special character values of the area overall. For example, the properties that I have mentioned in 1(c) above all contribute significantly to the demonstration of the pattern of community development within Freemans Bay south. Maintaining the integrity of those properties sited amongst older homes is essential to the historic qualities of Freemans Bay south and is of high relevance and importance to the cultural history of Auckland generally. Those properties, in their own right, justify a special recognition overlay as part of their site-specific analysis score, to reflect their role in defining the special character values of Freemans Bay south.

4. Impact on housing supply capacity and the objectives of NPS-UD

Special character areas as a qualifying matter, with or without the enhancements that I have proposed in 1. to 3. above, will have a negligible (if any) effect on capacity for additional housing supply. Special character areas in total represent only ~3% of total housing stock [ref: Auckland Council webinar: *Online Information Session: Special Character Areas*, 21 April 2022]. That is before the "high quality" filter is applied and before any potential off-sets to permit additional, more lenient, intensification that are available elsewhere (for example, on greenfield sites). There are several areas in Auckland, including areas adjacent to mass transit, that comfortably could sustain greater intensification which is more than sufficient to off-set any effect on potential capacity from maintaining special character areas as a qualifying matter.

The objectives of the NPS-UD are important. Those objectives, however, must be pursued reasonably within the statutory framework. The protection of special character values also is important and is enabled by the statutory framework. The balance between appropriately protecting special character values and allowing intensification in special character areas, strongly favours protection. The permanent, adverse consequences of failing to protect special character areas overwhelmingly outweighs the negligible (if any) impact on achievement of the objectives of the NPS-UD.

The impact of planning changes must be considered over the long term. Aucklanders fought successfully to preserve western city-fringe special character in the 1970s. Today we are thanking them for their efforts. Protection of those special character values was reinforced by the Unitary Plan. We are custodians of our heritage for future generations and do not want our current Councillors to take short term decisions which are unnecessary to achieve the objectives of the NPS-UD and would undo the long term historic, social and cultural benefits hard-won by our forebears. Such decisions are substantially irreversible and would put at risk the important heritage of our city for all future generations.

Q7 What do you think of the proposed residential special character areas that we have identified?
A Do not support – I think there are further areas that should be identified as a qualifying matter.

I believe that there is a small number of special character areas which currently are not assessed to be of high quality but which, when assessed against the additional criteria that I have suggested in my answer to Q6 should be applied in addition to or as part of the site-specific analysis, would be determined to be high quality special character areas. One such area is Freemans Bay north. While acknowledging Council's identification of sub-areas within Freemans Bay north that are to be recognised as high quality special character areas, the evaluation of the central neighbourhood around Arthur, Wood and Elizabeth Streets fails to take proper and reasonable account of the additional characteristics that, for the reasons set out in my answer to Q6, contribute collectively and materially to the quality of the special character of an area overall. Of particular concern is the failure to recognise within central Freemans Bay north:

(a) the role played by post-war properties in protecting the visual qualities of the adjacent Victorian and Edwardian properties and/or supporting the special character of the area overall; and

(b) the potential impact on the special character values of the Ponsonby Road business area, including the Ponsonby Road ridgeline when viewed from the city centre, of any high density development in the central neighbourhood of Freemans Bay north. The Ponsonby Road business area did not develop and thrive in isolation from its surrounding community. Despite the attractive simplicity of relying only on the site-specific analysis, doing so fails to properly recognise and account for the inter-relationship between the two adjacent areas and therefore has the potential to both overlook the special character values of Freemans Bay north and materially adversely affect the special character values of the Ponsonby Road business area.

Q8 What do you think of the proposed business special character areas that we have identified?
A Support

I strongly support the proposed business special character designation for the Ponsonby Road business area. The Ponsonby Road business area demonstrates both significant historic qualities and significant physical and visual qualities. Firstly, it has played an important part in the development of Auckland from its pre-colonial roots to New Zealand's major metropolitan centre. That history can be told and seen by reference to the Ponsonby Road ridgeline and surrounds. Secondly, it is an outstanding example of a traditional suburban main shopping street. It has retained overall its physical and visual special character, with more recent buildings being generally supportive of the heritage values. It has a dominant position along the ridgeline which is clearly visible from most parts of the north and west of the city centre – any significant development along Ponsonby Road (or in Freemans Bay to the east of the ridgeline) would have a major adverse effect on the urban patterns, landscape and streetscape qualities of the entire inner west catchment, especially when viewed from the city centre.

Notwithstanding that the Ponsonby Road business area has been identified as a qualifying matter under Council's current assessment methodology, that methodology suffers from many of the same limitations as those highlighted in my answer to Q6 with respect to the determination of high quality residential special character areas. In particular, identification of business special character areas as a qualifying matter relies unduly and unreasonably on the site-specific analysis and should include also an overall assessment of the area against the relevant special character values.

Q9 What do you think of our proposal to include areas in Auckland with long term significant infrastructure constraints as a qualifying matter?

A Support

I strongly support the proposal to limit development where there is inadequate infrastructure to support it. This additional qualifying matter is reasonably necessary to:

(a) Appropriately and realistically recognise the impact on overall public amenity, health and safety due to infrastructure constraints; and

(b) Facilitate controlled, planned and orderly infrastructure expenditure by Council.

It will be important to apply an appropriately effective definition of constraining infrastructure for the purposes of the qualifying matter. In particular, in addition to obvious characteristics such as the capacity of waste water, storm water, and other utility services to cope with intensification, the definition should include physical and topographical constraints on intensive residential or business occupation that would have an overall adverse impact on public amenity, health or safety. Those constraints would include narrow streets that limit both amenity and appropriate access by emergency and other services – for example the nature and extent of fire service access required for a multi-story apartment block is vastly different from that required for a single dwelling. There would be an unacceptable risk to human safety and property if the necessary emergency services are unable to easily access a property. Similarly, the capacity of roading to reasonably and safely cope with the significantly increased traffic flows related to deliveries and trades services, and the scale of rubbish, recycling and other Council services that will be required by highly intensive development, should be assessed as part of this qualifying matter.

Many infrastructure constraints will be cumulative – by which I mean that existing infrastructure might be able to cope with the first high intensity development but it becomes increasingly vulnerable with each subsequent development. Planning rules should not permit a "first come, first served" outcome which would deliver the worst of all choices – one or two high intensity developments that are out-of-place or "stranded" in otherwise low intensity areas, and which neither support the development of intensive urban hubs because they are sub-scale, nor sit comfortably within the surrounding community and built environment. If it is reasonably foreseeable that infrastructure limitations might constrain development in an area at any point in the medium to long term, then that area should be a qualifying matter from the outset.

In relation to Freemans Bay:

(a) I understand that there are long-term significant limitations on the waste water and storm water infrastructure to be able to cope with any material intensification. I understand that the capacity of the waste water / storm water separation project is based on the current zoning of the area. I also understand that Freemans Bay will not be connected to the Central Interceptor. Accordingly, it is reasonably foreseeable that the existing water infrastructure will not cope with residential intensification in any part of Freemans Bay.

(b) The several narrow streets (including Arthur Street and Wood Street) clearly are unsuitable to service high density development.

#7089

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Paul Stevenson

Name of organisation/business:

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Do not support - I think it should be closer

Tell us why

The St Marys Bay area is further out than 1200 mtrs and should not be regarded as a "walkable catchment."

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Do not support - I think it should be closer

Tell us why

The St Marys Bay area is further out than 800 mtrs and should not be regarded as a "walkable catchment."

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** Do not support - I think it should be closer

Tell us why

The St Marys Bay area several kilometres from rapid transit and should not be regarded as a "walkable catchment."

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?**

Tell us why

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?**

Tell us why

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Support

Tell us why

One of the key features to making a city livable is the retention of character or historic areas.

Auckland has already lost so much of its history. A feature and attraction of some many

cities overseas, including Melbourne and Sydney, is the ability to see well-preserved, character buildings.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

I believe the special character qualification should be extended to all of St Marys Bay, Ponsonby and

Herne Bay. These contain so much of Auckland's early history.

8. **What do you think of the proposed business special character areas that we have identified?**

Tell us why

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?** Support

Tell us why

St Marys Bay infrastructure is not able to cope with current demands and the water-separation

project, which is delayed, is based on current needs. With heavy rain the harbour continues

to be contaminated by sewerage. Further intensification would be disasterous.

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

Our home is close to the cliff overlooking the motorway. It is unstable and any intensification is likely to have a detrimental effect on a precarious landform. The addition of considerable engineering work will be at a considerable cost and will mean any housing is very expensive.

Important privacy information

The personal information that you provide in this form will be held and protected by Auckland Council in accordance with our privacy policy (available at **aucklandcouncil.govt.nz/privacy** and at our libraries and service centres) and with the Privacy Act 1993. The privacy policy explains how we can use and share your personal information in relation to any interaction you have with the council, and how you can access and correct that information. You should familiarise yourself with this policy before submitting this form.

#7094

Government's new housing rules: What it means for Auckland

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Your details

Your name and feedback will be included in public documents. All other personal details will be kept private.

Name: Anthony Doherty

Name of organisation/business: Country Rose Trust

Your local board: Waitematā

Your feedback (all questions are optional)

Requirements for intensification

Intensification inside walkable catchments

A walkable catchment (required by the NPS-UD) is the area around a train or busway station, or a large urban centre within which an average person will walk to that location.

The government requires councils to identify walkable catchments around the city centre, metropolitan centres and rapid transit stops (train or busway stations) where buildings of six storeys or more must be enabled.

We are proposing:

- a 15-minute walk (around 1200 metres) from the edge of the city centre.
- a 10-minute walk (around 800 metres) from the edge of the metropolitan centres and around rapid transit stops, such as a train station or stop along the Northern and Eastern Busways.

These are subject to modifying factors such as landscape, for example steep hills, and physical barriers including motorways.

1. **What do you think of our proposed walkable catchment of 1200 metres from the edge of the city centre?** Other

Tell us why

Will not be accepted by residents. Unworkable in St Mary's Bay neighborhood.

2. **What do you think of our proposed walkable catchment of 800 metres from the edge of the metropolitan centres?** Other

Tell us why

Marginal - too great a distance.

3. **What do you think of our proposed walkable catchment of 800 metres around rapid transit stops?** I don't know

Tell us why

Marginal - too great a distance.

Intensification around town and local centres

Central government has told us that we need to enable building height and density (for example terrace housing and apartment buildings) in and around our neighbourhood, local and town centres that matches the level of commercial activity and community services in each centre (such as jobs, shops and businesses). This is achieved by applying the Residential – Terrace Housing and Apartment Buildings Zone.

Town centres are larger suburban centres in Auckland that provide for a wide range of shops, services and activities for their surrounding districts. They are often spread across a couple of city blocks, and along main roads. Some examples are Glenfield, Glen Eden, Parnell and Papatoetoe town centres.

Local centres include a larger number of smaller suburban centres that serve local areas and neighbourhoods. Local centres might have 20 or 30 shops and some small offices.

4. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings Zone to residential areas up to around 400 metres from large town centres with high accessibility?** Do not support - I think it should be further

Tell us why

Not in St Mary's Bay precinct. The previous zone controls worked. The proposed zone rules are not acceptable. Apartment style living not accepted in principle for St Mary's Bay

5. **What do you think of our proposal to apply the Terrace Housing and Apartment Buildings zone to residential areas up to around 200 metres from small town centres or large local centres with high accessibility?** Support

Tell us why

With correct rules will provide intensification without detracting from city scale and neighborhood living

Qualifying matters

The government allows for some qualifying matters - exemptions to modify three-storey and six-storey building heights. Qualifying matters are a characteristic which can be used to protect sites of cultural, historic, or ecological significance or to avoid development in areas with natural hazards.

The government has already identified a number of qualifying matters and allows us to include other qualifying matters relevant to our city.

To include our own qualifying matters, we must provide robust evidence to justify why it should reduce building heights and density in a particular area in light of the government's direction to enable more housing.

Special Character Areas

'Special character areas' are older parts of the city that have special architectural or other built character value. They are covered by the Special Character Area Overlay in the Auckland Unitary Plan.

Many of Auckland's older residential suburbs were built around the early public transport network and emerging town centres. This is where our special character areas are located. The government is now directing us to enable increased housing density (e.g. buildings of six-storeys or more) within walkable catchments of town centres and public transport networks, and up to three storey buildings elsewhere.

The government has not included special character areas as a qualifying matter. However, we are proposing to include identified areas of special character as a qualifying matter that reduces limits on building heights and density to ensure the character values of these areas are retained.

6. **What do you think of our proposal to include identified special character areas as a qualifying matter?** Do not support – I think all existing special character areas should be a qualifying matter

Tell us why

The natural development in St Mary's Bay provides for a good neighborhood. The proposal for apartment living does not enhance the development of St Mary's Bay precinct.

7. **What do you think of the proposed residential special character areas that we have identified?** Do not support – I think there are more areas that should be identified as a qualifying matter

Tell us why

All of St Mary's Bay precinct east of Shelly Beach Rd should be included with maximum height control of 10m and standard method of boundary control, height and light/air.

8. **What do you think of the proposed business special character areas that we have identified?** Do not support – I do not think special character areas should be a qualifying matter

Tell us why

History tells us what will prevail and any business necessary for the functioning of the city. Decentralization is occurring which is to the detriment of the city.

Infrastructure constraints

We are looking to identify areas in Auckland with long-term significant infrastructure constraints as a qualifying matter. As with special character areas, this is not a qualifying matter that is listed in the NPS-UD or the Act.

This may include areas where water supply and wastewater networks may not be adequate to cope with more growth and are very costly and/or difficult to upgrade, or stormwater infrastructure is not adequate and very costly and/or difficult to provide, or where access to transport infrastructure is not adequate and very costly and/or difficult to provide.

By including this as a qualifying matter, it would reduce the limit on building heights and density that would otherwise be enabled.

We have not yet determined how we would apply this qualifying matter as the NPS-UD and the Act do not provide any specific support. At this stage, we want feedback on whether to consider this as a qualifying matter or not. If we include it as a qualifying matter, we will show the extent and location of any changes to height and density requirements in our plan change in August 2022.

9. **What do you think of our proposal to include areas in Auckland with long-term significant infrastructure constraints as a qualifying matter?**

Tell us why

Cost of upgrading and inconvenience to public. Long term constraints probably relate to maintenance with unlimited upgrading

Other qualifying matters

We are also proposing to include a number of other overlays and controls in the Auckland Unitary Plan as qualifying matters that limit the height and density of development on sites or across areas to retain the values they reflect. A description of these proposed qualifying matters and how they are proposed to be protected or kept is shown in the consultation document and information sheets available on akhaveyoursay.nz/housing.

These additional qualifying matters include:

- Ridgeline Protection Overlay
- Local Public Views Overlay
- Auckland War Memorial Museum Viewshaft
- Stockade Hill Viewshaft
- Character buildings in City Centre zone and Queen Street Valley Precinct
- Some of the existing built form controls in City Centre (e.g. allowing sunlight into public places, Aotea Square height control).

10. Do you have feedback on any other qualifying matters? (please be clear which proposal you are talking about)

I support all of the qualifying matters noted. General - I've attached copies of documents in Feb?? Forwarded to ACC noting objection to RMA proposal for 57 Shelly Beach Rd, St Mary's Bay . This is a"live" situation where we have clearly illustrated concerns regarding the RMA application. From 11 neighbours between 79-99 Shelly Beach Road, St Mary's Bay. See computer enlarged views(A2 size) submitted. To all planner oleg planning in Feb 2022. Return St Mary's bay to the pre unitary plan controls. Do hurry. ariba ariba . Retired architect.

Important privacy information

The personal information that you provide in this form will be held and protected by Auckland Council in accordance with our privacy policy (available at **aucklandcouncil.govt.nz/privacy** and at our libraries and service centres) and with the Privacy Act 1993. The privacy policy explains how we can use and share your personal information in relation to any interaction you have with the council, and how you can access and correct that information. You should familiarise yourself with this policy before submitting this form.

From:
Subject: RE: 87 SBR - Resource Consent Application
Date: 18 February 2022 at 3:48 PM
To:

Thanks Tony - rec'd.

Thanks

Oleg

-----Original Message-----

Sent: Thursday, 17 February 2022 11:16 AM

Subject: 87 SBH - Resource Consent Application

Hi Oleg

Attached please find report from 11 neighbours noting the Assessment of Effects of the above.

Regards
Tony

To Whom it May Concern

This submission is presented on behalf of the following affected property owners adjoining 87 Shelly Beach Road.

General

The adjoining residents understand that the Residential – Terrace Housing and Apartment Buildings Zone (THAB) is a high-intensity zone and that it provides for the greatest density, height and scale of development of all the residential zones.

It is also understood that standards are applied, and the resource consent requirements enable the design and layout of the development to be assessed whilst recognising the need

to achieve a quality design as the scale and intensity of development in this zone increases. The level of residential amenity within the vicinity of the site is of a good standard, with relatively high property values and Council rates reflect this.

The proposed development at 87 Shelly Beach Road is intensive, the existing dwelling is 2 storey with circulation space on 3 sides. The proposed building has a height of 16m with solid bulk/scale and there will be effects on persons and owners of adjoining properties.

The intent of the THAB zone is to

- achieve the planned urban built character of the zone;
- achieve attractive and safe streets and public open spaces;
- manage the effects of development on adjoining sites, including visual amenity, privacy and access to daylight and sunlight; and
- achieve high quality on-site living environments.

Height in Relation to Boundary Controls

The Alternative Height in relation to boundary control has been used for the proposed development which provides for and results in a large solid building with a maximum height of 16 metres. The alternative method of calculation is logical when dealing with the narrower sites typical in the St Mary's Bay neighbourhood but not perhaps this site.

It is understood that under activity table H6.4.1(A34) new buildings which do not comply with H6.6.6 Height in relation to boundary but comply with H6.6.7 Alternative height in relation to boundary is a restricted discretionary activity and it is noted that compliance with standard H6.6.6 Height in relation to boundary is not required.

However, in this instance given the 21m x 24m proposed building platform created by the site shape and the consequential effects on the adjoining properties we submit that the standard method of 3m + 45 degrees with a maximum height of 10-12 metres is more appropriate.

Residential Amenity, Bulk and Scale of the Proposal, Shading, Air Circulation & light glare and Privacy

It is considered that whilst the THAB zone makes provision for developments such as that proposed, effects on residential amenity for adjoining residents will be more than minor.

The transition in building scale and bulk, from the existing lower intensity two level dwelling currently on the site, to a 4-5 level solid apartment block located from mid-way to the rear (west) of the site, will affect the amenity of the environments of the adjoining dwellings.

The subject site has a land area of 1890m^2 that is irregularly shaped, with a 30m x 10m strip of land traversing the embankment to the motorway, which is largely unusable for residential purposes. It is however because of the relatively large area (square meterage) that the proposed development is able to comply with many of the zone standards for example building coverage, landscaping and impervious surface coverage.

However, given the unusual shape of the site the mid to rear western portion is the only viable location for the building platform and this is the highest contour of the site. This

location intensifies the effects in terms of shading, air circulation, privacy and visual dominance to an extent that is considered more than minor.

- Shading

  The bulk and location of the proposal will shade adjoining properties to a more than Minor extent. This will affect 91 and 95 Shelly Beach Road properties before 9 am and 85 and 85a Shelly Beach Road from 4pm. The properties to the east of 85 will be also shaded from 4pm until sunset. These comments relate to the 21st September time scale and Mr Doherty will provide proof of this.

  This is considered to be a more than minor effect.

- Air Circulation and Light Glare

  The bulk and location of the proposed building will materially affect the environment to the south and west of the proposed building. 95 Shelly Beach Road will receive less light and air flow due to the design and location of the south wall of the proposed building.

  Western afternoon sun glare and reflection from the glazed wall cladding will cause a loss of amenity to the existing buildings to the west of the proposed apartment building. In particular number 95 Shelly Beach Road will be affected the most.

  The prevailing wind from the north-west will cause turbulence to more than a minor degree in the space between the adjoining properties.

  Overall, these effects are considered more than minor.

- Privacy

  The proposed apartment block will reduce privacy to the occupiers of neighbouring dwellings. Outdoor living areas, and some internal living spaces will be overlooked without the ability to screen. Residents will endure a loss of privacy which is more than minor.

- Visual Dominance

  The proposed apartment building will be visually dominant within this low level residential one to three storey dwelling setting. The building is not nestled into the site with a 16m height maximum almost at the top of the ridgeline. The scale, bulk and form of the building will be prominent and dominant the landscape to an extent that is more than minor.

Earthworks and Geotechnical Investigation Report ENGEO Ltd (dated 21/05/2021)

Earthworks of 2786m^3 over an area of 1548m^2 are proposed across the site to create a level building platform, construct driveway access and car parking. This will involve a cut across the western section of the site and carry out fill along the eastern portion.

Although the geotechnical investigation indicates the site is stable it is requested that any excavation comply with the recommendations and conditions of ENGEO Ltd report dated 21/05/2021 and any additional Council conditions in order to safeguard the stability of neighbouring properties.

It is noted that driven timber piles have been suggested as an option, however it is considered that the noise and vibration associated with driving these may cause unacceptable affects. Bored reinforced concrete piles to retain the basement level have also been put forward as an option by the applicant and for obvious reasons this is the preferred option by the adjoining property owners. The retaining wall design should consider all appropriate surcharge loadings, back and toe slope angles.

Access and Traffic

Access

It is noted that access to the proposed building is via the existing upgraded driveway off Shelly Beach Road and descends down to the basement level on the eastern elevation. Seventeen basement carparks are provided.

The legal status of the right of way requires clarification. Concern has been raised regarding the levels of the driveway access in conjunction with the adjoining driveway which runs parallel to the existing. This matter is being investigated by the owners of the adjoining driveway at 85 Shelly Beach Road and the Council will be informed of the outcome once this matter has been clarified by the owners' lawyer.

Rubbish collection and manoeuvring of large vehicles (over 2.1m high) will require consideration. The proposed site does not provide for this and there is concern that the unlawful use of the forecourt at 85 Shelly Beach Road could become a vehicle manoeuvring area.

These matters require clarification.

Traffic

Residents are concerned about the increase in traffic volume of vehicles entering and exiting the site in terms of pedestrian safety and general amenity.

TO WHOM IT MAY CONCERN

REPORT OF ASSESSMENT OF EFFECTS ON 95 SBR. BY PROPOSED DEVELOPMENT AT 87 SBR .ST MARY'S BAY, AUCKLAND

1. **GENERAL**

This report and 3 Presentation Boards have been prepared by A. J. Doherty a retired Architect with 45 years' experience.

I was the M/D of Hoadley Budge Architects from 1984 until my retirement in 2010.

In 1987 I registered Cadabra Applied Computer Graphics Ltd. which provided computer graphics visualisation solutions.

Cadabra worked with ACC Planning Dept (George Farrant and Alan Kirk) generating studies included in the ACC District Plan for the Auckland Isthmus.

- View Shafts
- Shading effects on Public Spaces
- Sunlight Studies
- Light and Air Studies

2. **95 SBR.**

Property owned by the Country Rose Trust for the benefit of the A.J & H.M Doherty Family.

The residence was designed by A.J. Doherty, who also designed the residences at 97A & 97B SBR.

3. **ASSESSMENT of EFFECTS**

1. **Building Height**

- 87 SBR is a land locked site large in area, with restricted access to SBR via a Right of Way shared with 2 titles at 85 SBR.
- The site is overlooked by 15 separate properties.
- Building height is covered by Rules set out in the Proposed Auckland Unitary Plan Decision Version 19 August 2016

H6.6.6 Height in Relation to Boundary."

"PURPOSE: To minimise the adverse effects of building height on neighbours (i.e. dominance and shading) and reduce the overall visual dominance of buildings at upper levels."

height of building 3m + 45 deg.

H6.6.7 Alternative Height in relation to boundary within the Residential THAB Zone.

"PURPOSE: To enable the efficient use of the site by providing design flexibility at the upper floors a building close to the street frontage, while maintaining reasonable level of sunlight access where possible and minimising visual dominance effects immediate neighbours".

Comment. The proposal **fails** to meet either of the "Purpose Definitions"

H6.6.7 Intended to be available for narrow sites with buildings close to street frontage and not as used to design building of the bulk proposed by the developer.

The following is of concern to 95 SBR.

- Admission of sunlight to North face early morning
- Admission of Light / Air to the northern area of the property.
- Privacy
- Outlook
- Shading and glare
- Bulk & Location
- The site plan indicates the dominance of the proposal by utilising the AHRTHAB height to boundary method compared to the Standard method of calculation.

The adjoining 3 residences were designed to comply with 10m height control and compliance with daylight indicators current at the relevant period in the District Scheme.

Taking into account the contour of 87 SBR and the surrounding land I believe a 10m height control would be respectful to the Neighbourhood.

The impact on the amenity of the immediate neighbourhood of the top 2 floors (i.e., 4 apartments) of the proposal on the 15 affected neighbourhood properties is too great to permit the dominance of a 16m high structure of the proposed bulk and location.

2. **Visual Dominance**

The impact on 95 SBR due to the location of the proposal is illustrated on the computer visualisation views showing the Visual Dominance of the proposal.

The aerial views are accurate and show the unacceptable dominance of the project i.e..

- Bulk and location
- Loss of privacy
- Shade
- Outlook
- Light /air
- Visual dominance

The proposal at 16m height in a neighbourhood where 10m was the normal height control results in unacceptable level of Visual Dominance.

Contrary to the Civix Report the outlook from the living area at L3 95 SBR looks generally into the south glazed wall of the proposal. The outlook from the Dining area looks obliquely at the wall which is approx 22m long and 14m high.

The 2 bedrooms at L2 of 95 SBR also are affected to a similar degree.

The adverse effect is not minor.

3. **Overlooking and Privacy**

The dominant presence of the proposal will result in a more than minor effect on the neighbourhood 95 SBR is affected i.e.:

- The glass south wall of the project measures 22m x 14m and is sited 5.5m from the south boundary -and approx 8m from the residence at 95 SBR.
- 8 bedrooms in the proposal are within 9m of 95 SBR and a further 6 bedrooms within 12m i.e. total 14 of the proposed 24 bedrooms included in the proposal.
- The overlooking is excessive and will affect the privacy of residents of 95 SB

4. **Access**

- Access to 87 SBR is by a Right of Way off SBR.
- The traffic report does not adequately cover this item.
- The R of W is shared with 85 SBR 2 Titles.
- Manouvering of Utility vehicles and Commercial vehicles will be to reverse onto SBR.
- The onsite entry to the carpark is noted as 4.392m
- The construction of the retaining wall structure to support the R of W to 85 SBR will reduce this dimension.
- Access to and manoeuvring of emergency vehicles is of concern to 95 SBR ie Fire Services and Medical.
- Access to the site -see submission by 85 SBR owners.

5. **Earthworks**

Earthworks necessary to construct the project are substantial and all neighbours will require protection from the perils associated with the work.

95 SBR residence is a 4-level reinforced concrete structure -walls and floors.

The foundations are reinforced concrete strip and pad footings 500mm deep below ground level.

Construction effects are of concern i.e.:

- Stability

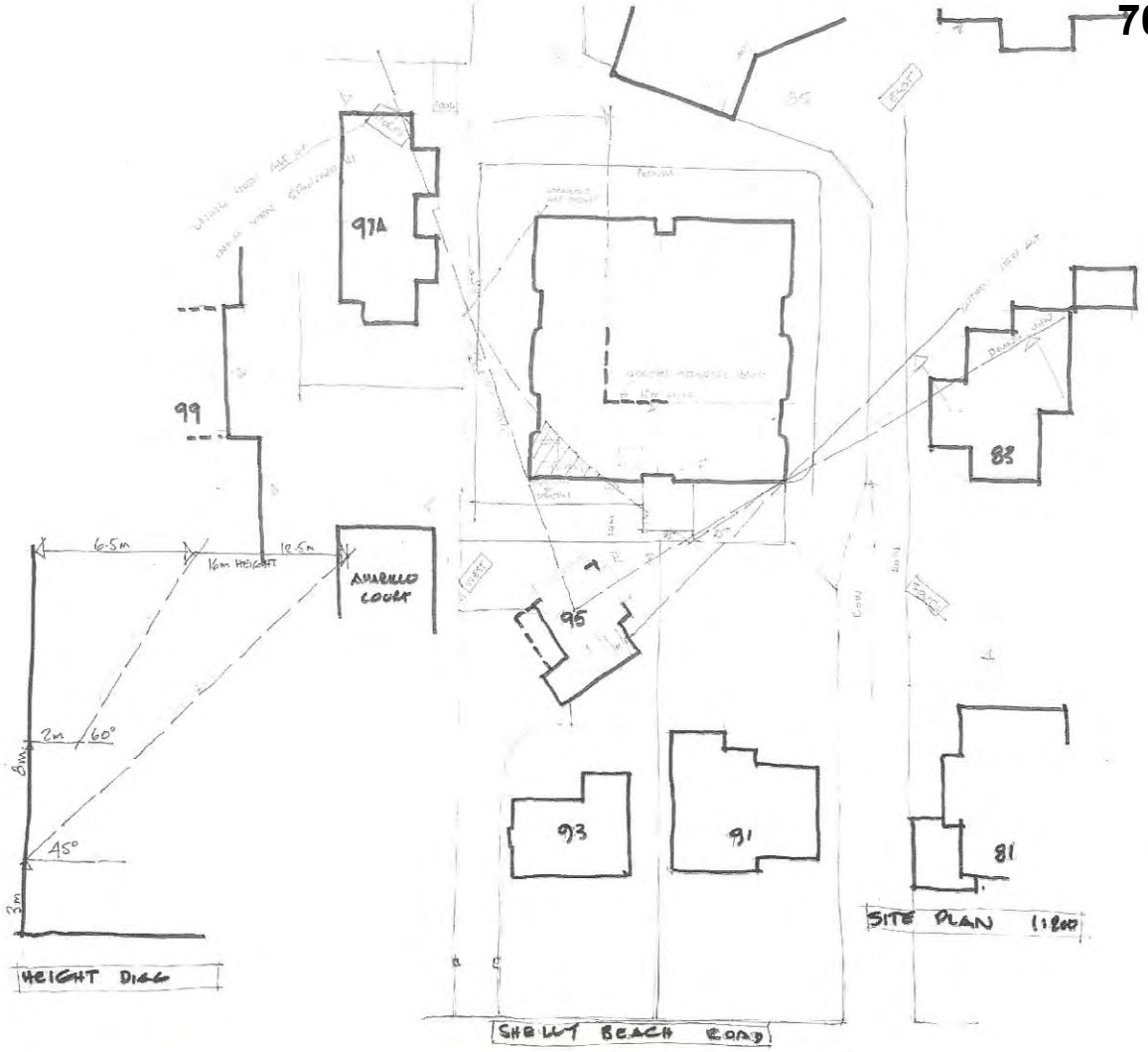
- Vibration and support
- Excavation
- Dewatering
- Dust and noise
- Security

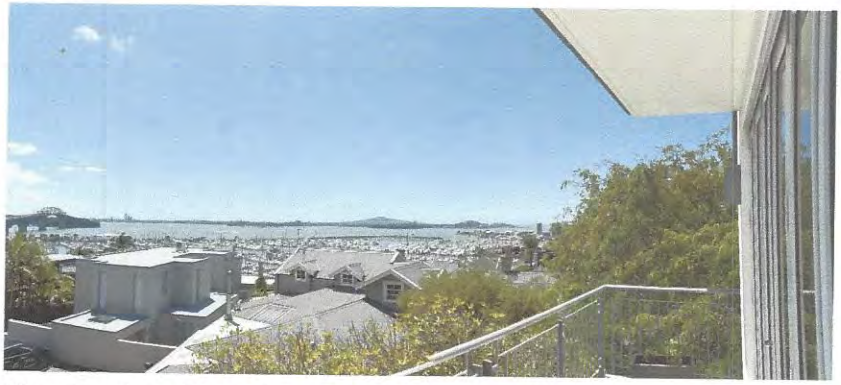
6. **Summary**

The owners of 95 SBR are concerned with the following:

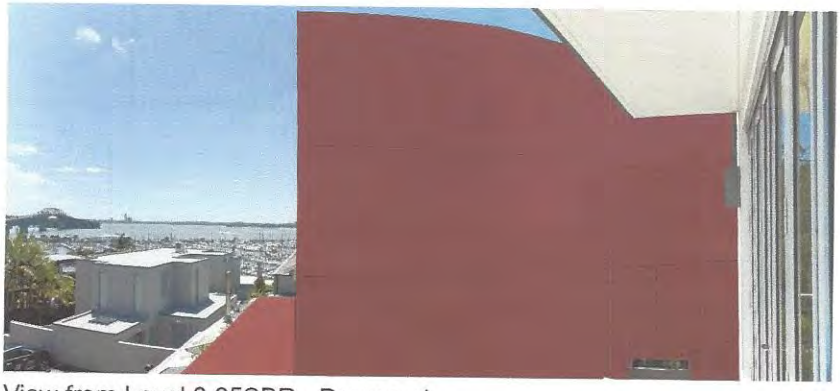
- The type of residential accommodation proposed is not typical in the neighbourhood or desired by the neighbourhood.
- There has been no dialogue with any party associated with the development.
- The proposal is excessive in bulk and location.
- The proposal does not meet the standard or expectations of PURPOSE definitions in the H6.6.6 or H6.6.7 rules for height to boundary.
- The permitted height of 16m does not permit a satisfactory neighbourhood friendly design solution for 87 SBR.
- The Resource Consent Application should be Notified for Public comment as provided for in the Resource Management Act.

Anthony J Doherty Dipl. Arch. ANZIA. ARIBA. ARAIA. (Retired)





View from Level 3 95SBR - Existing



View from Level 3 95SBR - Proposed

87 Shelly Beach Road
Saint Mary's Bay, Auckland



View from Harbour - Existing



View from Harbour - Proposed



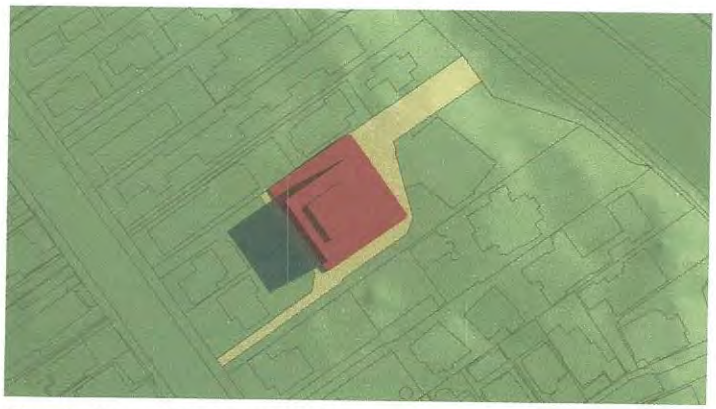
Plan View - Existing



Plan View - Proposed



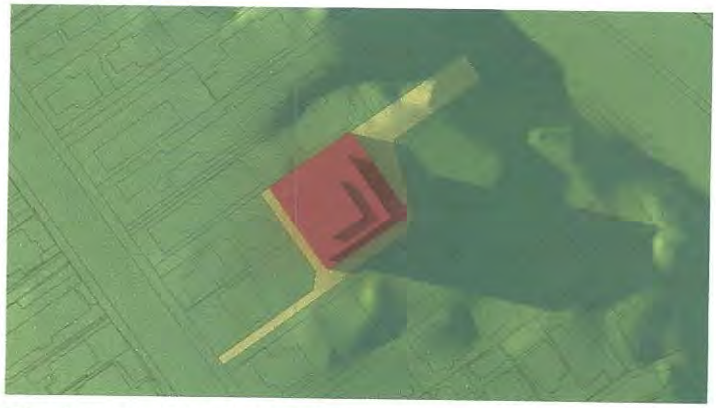
Shade 9am, 21st September- Existing



Shade 9am, 21st September - Proposed

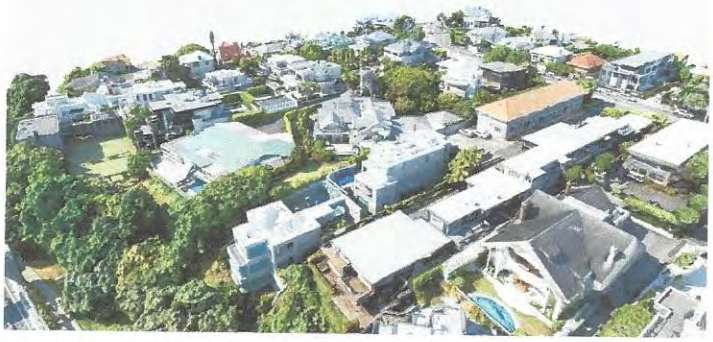


Shade 5pm, 21st September - Existing



Shade 5pm, 21st September - Proposed

87 Shelly Beach Road
Saint Mary's Bay, Auckland



View from North - Existing



View from North - Proposed



View from West - Existing



View from West- Proposed



View from South- Existing



View from South - Proposed



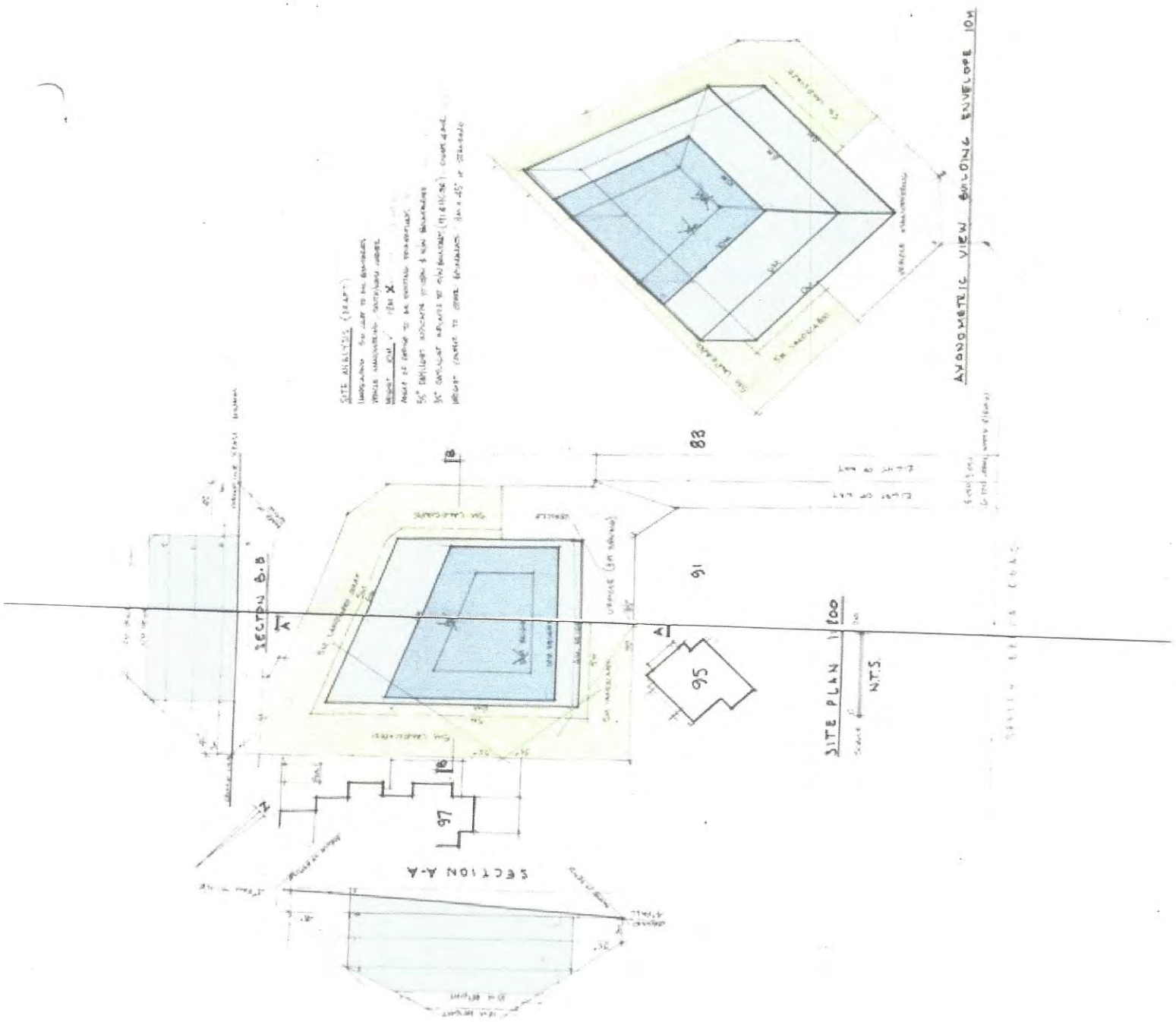
View from East - Existing



View from East - Proposed

87 Shelly Beach Road
Saint Mary's Bay, Auckland

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87 Shelly Beach Road
Saint Mary's Bay, Auckland