

SUBMISSION ON AUCKLAND COUNCIL'S PRELIMINARY

RESPONSE TO NPS-UD AND MDRS – 9 May 2022

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.greyllynresidents.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.greyllynresidents.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

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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.

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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 kaitiakitanga and stewardship.

3.4 However, many Grey Lynnners 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

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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 Cocks 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.



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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@greyllynresidents.org.nz