

NOTICE OF SUBMISSION ON PROPOSED PLAN CHANGE 78 AUCKLAND UNITARY PLAN

To: Planning Technician, Auckland Council

Email: unitaryplan@aucklandcouncil.govt.nz

Scope of Submission

This is a submission from the Grey Lynn Residents Association opposing Proposed Plan Change 78 as it affects the Auckland suburb of Grey Lynn (including Arch Hill). If the Proposed Plan Change 78 is not declined then we wish to have the provisions of the Plan Change amended according to this submission.

About the Grey Lynn Residents Association

- a. Grey Lynn Residents Association (GLRA) represents the people of Grey Lynn (including Arch Hill). 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. It does advocacy and activism work to make Grey Lynn the most liveable suburb in the world.
- c. As stated on its website, (<https://www.greyllynresidents.org.nz/>):GLRA exists for the following reasons:
 - * To provide a unified voice for the residents of Grey Lynn
 - * To promote and protect the interests and welfare of Grey Lynn residents
 - * To undertake advocacy and activism work to make Grey Lynn the most liveable suburb in the world
- d. 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.
- e. 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

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suburbs such as Westmere and Ponsonby) and half of whom had lived in Grey Lynn for more than 10 years.

- f. People were asked what their biggest concerns were in Grey Lynn. These included the effects of intensification, threats to character, traffic and crime.

Submission

Intensification

We oppose the walkable catchment of 1200 metres from the edge of the City Centre zone.

We oppose the 400 metre area of intensification adjacent to the Ponsonby Town Centre.

We oppose the 200 metre area of intensification adjacent to the Grey Lynn Local Centre.

Special Character Overlay

We oppose the removal of the special character overlay from the houses 73, 75, 77, 79, 81 and 83 Dryden Street, Grey Lynn.

Qualifying Matters

We support the inclusion of Special Character as a qualifying matter.

We support the inclusion of Notable Trees and Notable Groups of Trees as a qualifying matter.

We support the inclusion of Infrastructure Constraints as a qualifying matter.

We support the inclusion of Flood Plains as a qualifying matter

Schedule of Notable Groups of Trees

We ask that the avenues of London plane trees in Selbourne Street, Browning Street, Castle Street and Francis Street be added to the schedule of notable groups of trees.

Amenity Values

We ask that neighbours amenity values are considered in the Mixed Housing Urban zone rules.

We ask that neighbours amenity is considered in the zone rules for Terrace House and Apartment zone where this zone adjoins another residential zone.

We ask that structure plans are prepared for areas where intensification is planned.

The reasons are:

1. **Overview of the History of Grey Lynn**

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,

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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. 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, by contrast, is a special place; its homes and open space provide a link to the past that is cherished by its residents and the wider community.

3. Intensification

There are three areas of high density intensification introduced in Plan Change 78 that affect Grey Lynn:

City Centre walkable catchment of 1200 metres

Ponsonby Road Town Centre adjacent area of intensification of 400 metres

Grey Lynn Local Centre adjacent area of intensification of 200 metres

4. The extent of these changes is vast. It is clear that this would provide a massive oversupply of residential high density zoned land and that only some would be redeveloped in this way. In an ad hoc manner, given that structure planning is not proposed in Plan Change 78, the six storey apartments that are permitted will tower over adjoining one or two-storey homes, robbing them of privacy and sun – a recipe for poor outcomes for neighbourhoods and leaving residents in constant fear of having a massive apartment building next to them.
5. Overseas examples such as the very dense West End of Vancouver show that clusters of tall apartment buildings can be located in a manner that can create pleasant, busy and vibrant neighbourhoods but the important point is that there be zoning and centre planning so that such clusters appear in designated areas and are not pepper-potted through and erected over many decades, which leads to discordant, incoherent urban environments.

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6. Because the extent of the city centre walkable catchment is so large this unstructured gradualism would be enabled over a very wide area. For that reason the GLRA opposes the proposed extent of the city centre walkable catchment.
7. In 2011 Auckland Council accepted the advice of international consultant Jan Gehl, who said that 500-800 metres was the furthest walkable catchment likely to be used in our city. Walkable catchments of up to 800 meters are considered a maximum internationally and yet Auckland Council has instead adopted a city centre walkable catchment that is considerably larger. We ask that the walkable catchment from the city centre be reduced to 800 metres.
8. 'Walkable' in practice is constrained by topography and street pattern. The lasso gesture of measurement applied to a map does not take into account hills or street pattern or any of the other factors that actual, walkers have to negotiate.
9. We also oppose the extent of the Ponsonby Road adjoining area of intensification. Ponsonby Road is a strip shopping centre with plenty of cafes and boutiques but few shops and facilities serving the daily needs of locals. We feel that a smaller adjoining area of intensification is appropriate for Ponsonby Road given the level of service provided. We ask that the adjoining area of intensification be reduced to 200 meters measured from the edge of Ponsonby Road.
10. We oppose the Grey Lynn local centre adjoining area of intensification. We believe that Auckland Council's method of deciding which local centres are large is flawed and that Grey Lynn local centre is not "large" as Auckland Council asserts. Council's method was to measure the footprint of all the local centres in Auckland, take the average, and classify anything above the average as large. Grey Lynn Local Centre is the smallest of the local centres classed as large and given an adjoining area of residential intensification. It has been put in the same category as local centres that have footprint nearly three times larger. It has been given an adjoining area zoned for apartments despite having a smaller development capacity than some centres with a smaller footprint that are classed as small. Grey Lynn is a special character shopping centre and as such has a lower height limit covering much of the street frontage so its development potential is much lower than for similar sized local centres that aren't covered by the special character overlay.

11. The footprint of the Grey Lynn local centre has been measured at 3.1 hectares, only slightly more than the modern Mt Wellington local centre which at 2.9 hectares is considered a small centre. One of the key differences between these centres is the development potential. The Grey Lynn local centre with its special character 13 metre height control overlay will never be as large as the Mt Wellington local centre which has a higher height limit over the whole centre. All of the character defining buildings in the Grey Lynn local centre are one or two stories in height which further limits the extent to which the local centre can grow. In contrast, the Mt Wellington local centre has no special character overlay so the development potential is far greater and it can become a much larger local centre than Grey Lynn will ever be.

12. Grey Lynn is small local centre with limited development capacity and as such it doesn't warrant having an adjoining area upzoned for apartments.

13. Chapter D – Overlays

We note that the special character overlay has been removed from six houses at the northern end of Dryden Street despite these houses all being ranked by the Council survey as 5 or 6. This is surely a mistake that needs immediate correction. There seems to be no justification for the removal of the overlay from these houses and we ask that the overlay be immediately reinstated.

14. Qualifying Matters

We applaud the Auckland Council's decision to include Special Character as a qualifying matter in Plan Change 78. This allows the Council to continue the legacy of protection and stewardship – kaitiakitanga - of the special character and historic heritage of Auckland as it exists in Grey Lynn as well as many other parts of Auckland.

15. 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 also the enhancement and improvement of Grey Lynn's housing stock. This has been a highly

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successful focus of kaitiakitanga and stewardship. We strongly support the protection of this built heritage that, if lost, will never be replaced.

16. 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. 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. The restoration of these properties has further reinforced the special character of the area.
17. In our feedback to the Draft Unitary Plan and our subsequent submissions to the Proposed Unitary Plan we asked that:
18. “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 special character overlays, to allow the full extent of historic character in Grey Lynn to be identified and protected.”
19. We note with disappointment that the extent of the area covered by the overlay prior to this plan change has not been enlarged since the early 1990s. We urge Council to undertake a survey and special character assessment of areas not already covered by the Special Character overlay. This work should be undertaken as a matter of urgency as this historic environment tells a huge story. Grey Lynn is one of the great wooden suburbs of Auckland, a place that strongly expresses the growth of urban life in New Zealand from the late nineteenth century through until the mid-twentieth century. We are proud of this heritage and consider it to be something to celebrate for all New Zealanders.
20. We strongly support the Auckland Council’s inclusion of notable trees and notable groups of trees as a qualifying matter. These trees play a role in minimising climate change and support populations of native bird species by providing food and habitats.
21. We remain concerned that the beautiful avenues of London plane trees in Selbourne Street, Browning Street, Castle Street and Francis Street remain unprotected. We ask that these be

added to the schedule as notable groups of trees. These trees are a valuable part of the character of these streets and as large trees they play a role in minimising climate change.

22. We strongly support the inclusion of infrastructural constraints as a qualifying matter. We are well aware of the negative effects of sewage overflows from the combined wastewater and stormwater network on the waterways and harbour. It has been unsafe to swim at Coxs Bay for many years due to sewage outflows from the overloaded combined wastewater network.

23. We strongly support the inclusion of flood plains as a qualifying matter so that intensification does not occur in places where flooding is likely to occur.

24. Zone Rules – Special Character and Historic Heritage

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

25. Zone Rules – Residential Zones

Residents deserve 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, especially important during the coming climate change and need to lower ambient temperatures. New developments must also not rob existing neighbouring residents 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 and strip the economic value from their homes.

26. Some form of controls are needed to mitigate the effects of redevelopment such as that envisaged and enabled by this Act on adjoining properties, and we support any moves Council may have to achieve this mitigation.

27. Those who are to live in the future development, should these go ahead, deserve to have places of quality with quality amenity, and we note that design and other amenity matters are not required by the NPS.

28. It is vitally important that the zone rules for Mixed Housing Urban are refined so that neighbours' amenity is preserved. This will be the most widespread zone in Auckland. When the Mixed Housing Urban zone rules were originally formulated, the zone was considered a development zone where most of the houses would be redeveloped within 30 years. As this zone will now cover most of Auckland, it is no longer a zone where such a high level of development can be expected. Consequently, developments within this zone are likely to be pepper potted about existing neighbourhoods, so it is vitally important that neighbours amenity is considered.

29. Areas of zoned for high density residential development must have structure plans to ensure well-functioning neighbourhoods.

In summary GLRA seeks the following decisions in amending Plan Change 78:

1. Reduce the City Centre walkable catchment to a maximum of 800 meters as walked, that is that this measurement is applied to actual walkways not applied as a blanket, with a graduated allowance that takes account of topography.
2. Reduce the Ponsonby Road adjoining area for intensification to 200 meters measured from the edge of Ponsonby Road.
3. Reclassify the Grey Lynn Local Centre as a small local centre.
4. Delete the intensification within 200 meters of the Grey Lynn Local Centre.
5. Reinstate the special character overlay over numbers 73, 75, 77, 79, 81 and 83 Dryden Street, Grey Lynn.
6. Retain residential and business Special Character as a Qualifying Matter.
7. We ask that Council commit to undertaking a survey and special character assessment of areas not already covered by the Special Character overlay and add qualifying areas to the special character overlay.
8. Retain infrastructural constraints as a qualifying matter.

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9. Retain notable trees and notable groups of trees as qualifying matters.
10. We ask that council add the avenues of London plane trees in Selbourne Street, Browning Street, Castle Street and Francis Street to the schedule as notable groups of trees.
11. We ask that the Mixed Housing Urban zone rules be refined so that neighbours' amenity is preserved.
12. We ask that zone rules for THAB zoned properties which adjoin residential properties zoned for lower density housing be refined so that neighbours' amenity is preserved.
13. We ask that Council prepare Structure Plans for areas zoned for high density residential development.
14. We request that the rules for density and height retain the low scale of development in Special Character areas.

We wish to be heard in support of this submission

28 September 2022

Submitted by:

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on behalf of the Grey Lynn Residents Association Incorporated

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