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Ellerslie Residents Association
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Ellerslie Residents Association Submission on the Proposed Auckland Unitary Plan

The Ellerslie Residents Association (ERA) welcomes this opportunity to provide feedback to the Auckland Council (the Council) on the proposed Auckland Unitary Plan (the Plan).

The ERA advocates on behalf of Ellerslie Residents to achieve our objective of being the World's Most Liveable Suburb. We currently possess approximately 450 subscribers, but this submission has been informed by the opinions and feedback of all those that have attended our public meetings, filled in surveys and provided informal feedback to us since we began engaging residents on the Unitary Plan November 2012.

We congratulate the Council on development of the Plan and acknowledge those points upon which the Council have agreed with the ERA since the draft Unitary Plan was delivered early in 2013.

In particular, we would like to emphasise our strong support for a **maximum height limit of 12.5m or three storeys for the Ellerslie Town Centre**. There is strong community support to retain building heights at the existing levels both to retain the character of our town centre and to prevent shading across the main street. We consider there is sufficient capacity within the centre to accommodate growth until well beyond the next iteration of the Unitary Plan with a three storey height limit. Furthermore, there is a strong preference among Ellerslie residents to extend, when in the future such expansion is required, the town centre zone along Main Highway rather than "up" additional storeys.

General

We acknowledge the progress the Council has made in developing the Unitary Plan and recognise it is a major challenge to consolidate the many existing RMA documents.

Unfortunately, we feel the scale of the challenge may have been too great for the resources of the Council to successfully overcome in the time given.

We do not believe the Council has sufficient information to allocate growth in and around Ellerslie, or in other parts of Auckland. We remain extremely concerned at the lack of available information on the infrastructure capacity of our suburb or of the investment required to ensure future residents of Ellerslie enjoy the same levels of service as those of today.

We are unable to find the transport modelling which shows that Ellerslie will continue to function efficiently following proposed additional growth?

We were unable to access the data which shows the capacity of water and wastewater networks in and around Ellerslie and where is the assurance that where necessary these will be renewed in time to meet new growth?

Where is the cost-benefit analysis which shows growth in Ellerslie is more cost-effective than growth elsewhere in Auckland?

School rolls in key Ellerslie primary schools have doubled in the last six years. We were unable to find any modelling of where will the children of new residents be schooled and what will those schools look like if our population doubles?

Rapid growth from a unexpected demographic change in children and young people in Ellerslie has affected the ability of our sporting clubs to meet the needs of these children. Further intensification will compound this difficulty.

We have surveyed the Section 32 analysis included on the Council website and find this information woefully inadequate to not only inform good planning but even meet the requirements of the law.

If the Council does not have this information consolidated and accessible to inform coherent and evidence-based policy, who does and how will it be accessible?

We find in general that there is an unacceptable lack of expert technical information on the capacity of our suburb to accommodate growth.

This issue has been exacerbated by an associated decision to plan for growth according to high growth population projections. Information which has become available since the Auckland Plan, notably 2013 Census data, clearly indicates that medium growth projections are more reasonable over the long term.

Before further growth is facilitated around Auckland, it is critical that the Council use the most recent and accurate information available and we encourage the Council to revise the Unitary Plan using better data before further errors in future forecasting are made.

The objective of using the Unitary Plan to deliver the Auckland Plan we also find to be in conflict with the law, as the Auckland Plan has never been through a robust RMA consultative process. As a direct result of a rushed and poorly consulted process, we believe the ambitious and widely appealing objectives of the Auckland Plan are in practice undeliverable and that therefore the Auckland Plan document cannot and must not be used as the guide for the RMA-based Unitary Plan.

We recommend working with the Government to accelerate further Special Housing Areas for prioritised growth and affordable investment until the Council can consolidate the necessary technical information essential to determining where in Auckland new populations and commerce can live and grow with the least impact on the environment, existing neighbourhoods and the finances of Council.

We support

The ERA and our members are committed to Ellerslie and wish to retain the character and amenity of our suburb. We do not oppose growth or new development, but hope that development to be in keeping with existing character, and that new housing is of a quality and standard that maintains the health and well-being of our residents and suburb. We request that the Council take all measures to facilitate consistent and quality development in Ellerslie.

While we retain a number of concerns over the capacity of Ellerslie's infrastructure to support new growth in our suburb and await the evidence base demonstrating where growth can be accommodated and when investment will be forthcoming, we conditionally support the following provisions in the Plan:

- We support the provisions governing the use of land zoned as special purpose in and around the Ellerslie Racecourse. The ERA has worked closely with racecourse management to reach accord on the permitted activities for this area and are satisfied an acceptable outcome has now been reached. We commend the Council for adopting provisions which accurately reflect the accord between the Racecourse and local community.
- We support the areas identified in Ellerslie as single housing. We consider these zones to represent areas of special heritage and historic value to residents and Aucklanders.
- We support the 1944 character overlay, noting that this provision will help protect the large number of dwellings in Ellerslie with historic value.
- We support the protection of open spaces in Ellerslie, noting in particular the protection of Liston Park, the Ellerslie Domain and St Michaels Reserve.
- We support the Special Character Statement – Business for Ellerslie in Appendix 5 section 10.1.3, and we would like an additional clause added to the Appendices ensuring that the unique worker and railway housing in Findlay and Hewson streets be afforded special recognition as part of its relationship to the character of the Ellerslie Village. This would add; Appendix 10.4. 4 Isthmus D - Ellerslie Residential

a) Historical Significance

The Ellerslie Railway station was the first railway interchange for passengers going to Onehunga from Auckland and Mr Graham established entertainment facilities for Aucklanders such as a zoo and later a racing club. Ellerslie has buildings that reflect that era of history, that is, the early examples of railway workers houses, and racing stables. In keeping with its history and our founding father's vision for the suburb, even today people from around Auckland still come to the Ellerslie Village on the weekend to dine and relax. The Auckland Racing Club continues in the finest of traditions of Racing in New Zealand. The Ellerslie Heritage walk takes pedestrians to many of these historic and heritage sites that all have their own special stories. These heritage buildings and historic sites are part of the character of Ellerslie and should be preserved if at all possible.

b) Physical and visual attributes

The low lying area alongside the motorway at the south end of the shopping village contains significant examples of railway workers and the first examples of purpose labourers houses

built by the Government of the day to set the standard for workers housing in Auckland. The other areas of single housing designated in the Unitary Plan in Ellerslie, capture the character of early Ellerslie and its history.

c) Boundary justification

The Unitary Plan already identifies these sites of significance in Ellerslie through its Historic Character Overlay in the heritage section of the map key and they are protected by the pre 1944 provisions.⁴

We oppose

However, we find a number of the provisions in the Plan to be inconsistent with residents' vision and aspirations for our suburb:

- We oppose four storey development in the Ellerslie town centre and the terraced housing and apartments (THAB) zone adjacent to the town centre. (We have no objection to four storeys in the mixed use zone or THAB zone in other areas.) Existing development heights in and around the town centre are consistently three storeys, something we consider is in keeping with the character of Ellerslie. Recent redevelopment of a Housing NZ site bordering the Ellerslie town centre considered four storey development but following strong local opposition this option was deemed to be inconsistent with the surrounding area. We do not consider that anything material has changed in Ellerslie that justifies a shift to four storeys or more in and around the town centre. We have, however, identified areas in Ellerslie with greater intensification potential, which may offset the loss of density in and around the village (discussed below) to help meet council objectives.
 - We recommend either implementing an overlay which prohibits development in Ellerslie town centre above 12.5m and changing the areas around the town centre zoned THAB to mixed housing – suburban.
- We oppose the removal of car parking minimums and the enforcement of maximums. The availability of car parking is essential to the activities of Ellerslie and the liveability of the suburb. Removing minimums will permit the immediate removal of car parks for new development and will prevent new supply at a time when more people will seek to access the suburb's amenities. Cars will migrate to on-street parking, with impacts for traffic flows and general parking availability. Accessing shops will become more difficult for residents, impacting retail sales. THAB zone residents will consume shopping and street parking, impacting both commerce and traffic. Minimums are essential to the liveability of the suburb, the accessibility of our town centre and necessary to contain congestion.
 - We recommend that car parking minimums are restored and maximums removed in the town centre and THAB zones.
- We oppose the THAB zoning of residential housing along Tecoma St. The zoning will permit heavy intensification along a very short motorway off-ramp which immediately intersects with residential housing. We have serious concerns for safety along Tecoma St should dwellings there not be required to provide turning bays and other facilities necessary to allow vehicles to exit driveways safely.

- We recommend zoning properties fronting Tecoma St as single housing. Properties behind those immediately adjacent to Tecoma St may retain their THAB zoning, with the provision that there must be sufficient ability for vehicles to enter and exit the properties safely.
- We oppose a threshold for increased development under the mixed housing – urban and suburban zones of 1200m². Many properties in Ellerslie are 600m² or above, therefore requiring just two properties to trigger greatly increased residential development which is not consistent with existing land use or character.
 - We recommend increasing this minimum allowance for triggering increased development to 1500m².
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We request

In addition, we request the following more minor modifications to the Plan:

- We request a shift of growth around Ellerslie. We do not seek zero growth in Ellerslie and recognise that new populations must be accommodated in our city. However, we consider that the existing Plan provisions have directed growth to areas which cannot sustain new development while maintaining the character and amenity of our suburb. Higher density living should only be permitted in those areas where the impact of taller buildings is less obtrusive, that is, in valleys and along lower lying areas, rather than on ridges.
- We request the following reallocations of growth around Ellerslie. These reallocations have followed conversations between ERA Chair Bryan Johnston and Auckland Council Chief Planning Officer Roger Blakeley:
 - that the area zoned THAB between Ladies Mile and Amy St is rezoned mixed housing – suburban. We do not consider the THAB zone to be in keeping with existing land use for much of this area and that four storeys is in keeping with none of it. The ERA considered very seriously recommending a mixed housing – urban zoning, but this was met by strong opposition by residents within the affected zone who consider the character of the area will be severely undermined by any increase in zoning. Residents have voiced particular concern for the large number of pre-1944 houses in the area which are now rezoned for apartments, yet cannot themselves be developed without resource consent. This leaves those property owners in a situation where they can neither redevelop their properties, but may endure redevelopment “next door”. Many residents are concerned that this provision will greatly reduce the value of their properties, will materially impact the character of their neighbourhood and reduce the amenity of Ellerslie;
 - and that the area zoned mixed housing – urban between Ladies Mile and Amy St is rezoned mixed housing – suburban. This area is located upon steep terrain and is not suitable for apartment-style development which is potentially permitted on land lots greater than 1200m² in the Plan;
 - and that lost opportunities for development between Ladies Mile and Amy St are regained with a rezoning of the land currently identified as light industrial between Cawley St and the Ellerslie Panmure Highway. This land is proximate to the Ellerslie train station and already contains one building of approximately 12 storeys. We would support rezoning this area THAB and permitting building heights of up to 12

storeys (or the same height as the existing James and Wells building), gradually moving down to three storeys consistent with the adjacent THAB zone (the maximum building height we request to be reduced from four to three storeys, as discussed above);

- o and that the area between Wilkinson Rd and Ellerslie Panmure Highway be rezoned THAB – four storeys.
 - o and that the area between Hudson St and Main Highway be considered for more intensive development, for example, mixed housing – urban. This area is close to transport, the town centre and is already home to medium density town houses.
- We request an intermediate zoning between the THAB zone on the north side of Tecoma St and the adjacent single housing zones to balance development.
 - We request that provision in the Plan is made for new tree plantings along berm and other public land areas to offset the impact of new development on Ellerslie’s green environment.

We thank the Council for this opportunity to submit on the Unitary Plan.

Any requests or questions in relation to this submission can be made to:

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