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4 May 2022

To: Auckland Council

Re: Submission on Auckland Council's preliminary response to the National Policy Statement on Urban Development (NPS-UD)

The Ellerslie Residents' Association (ERA) acknowledges the current housing crisis across New Zealand, and particularly Auckland. Our stance is pro development and we fully support the building of more affordable houses. There a number of new constructions underway in Ellerslie currently, including the Safari Development in Central Park, the Fletcher Building development in the Ellerslie Racecourse and the proposed Kainga Ora public housing development of multiple units in Arthur Street.

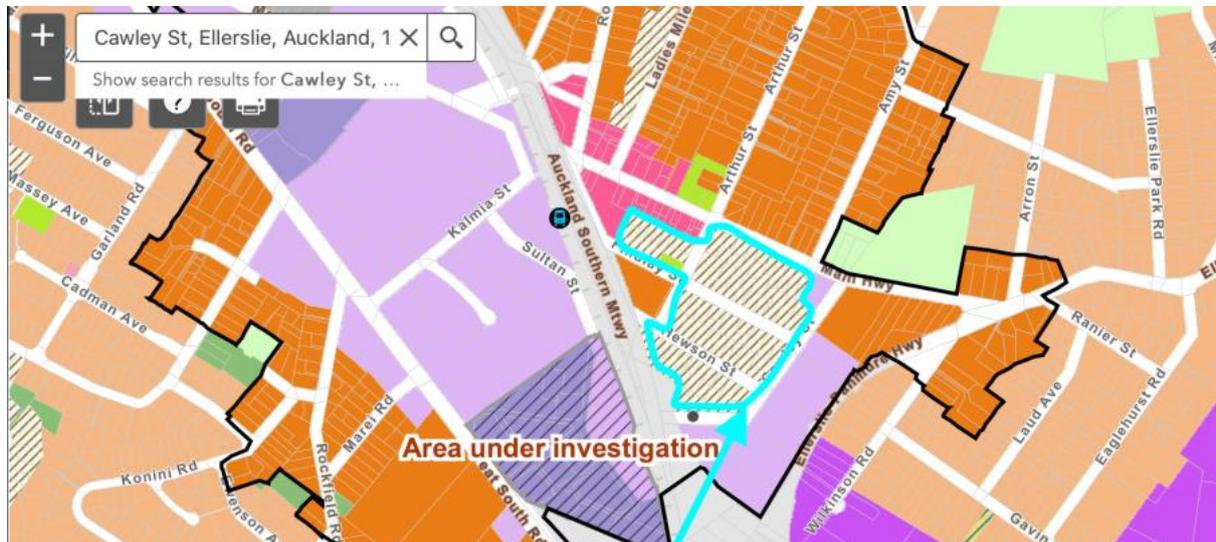
However, we do encourage this development to be determined wisely and with forethought for protection of those **areas which are of special interest** to Auckland's history and early development. These areas **only account for a small portion** of Auckland's land area as a whole, and of land near transport hubs.

Notably, the impact of Covid lockdowns and the impact of more people largely working from home has left many commercial buildings in the centre of the city empty, presenting opportunities for redevelopment for affordable housing and revitalisation of the city centre by repurposing existing buildings. Even if all Special Character areas are retained as present, the National Policy Statement on Urban Development still enables sufficient development to address the housing crisis and Auckland's housing needs for the foreseeable future. The ERA therefore believes that **such repurposing coupled with some rezoning of residential land is preferable to the irreversible loss of Auckland's heritage** in Special Character areas.

To that end, we strongly advocate for **lowering the threshold** proposed for residential character areas to be **retained as qualifying matter** from **66% of the area to 50%**. Doing so will retain small but significant areas of Auckland's heritage without significantly reducing the potential supply of affordable housing.

Alternatively, if Council retains the 66% level but included properties that scored 4 and above (instead of the current 5 and above), much more of the history and character of our local areas would be preserved.

Our particular concern is that the heritage housing area in Ellerslie bounded by Ramsgate/Findlay/Hewson/Cawley Streets (see blue area in the map below) be retained. It is currently proposed to lose its **Special Character Overlay**, and we strongly advocate for **retention** of this Overlay as a **Qualifying Matter**.



This area has a unique and long history which provides a special contribution to Ellerslie Village as an important part of our community. As the [ERA website](#) details, the Government owned 100 acres of Ellerslie, and in 1905 passed the Workers' Dwellings Act that enabled quality houses to be built for workers on low incomes and to help people escape poor housing and high rents in the city suburbs. Ellerslie, Petone and Sydenham were the first settlements to be developed with houses built for railway workers and trades people, and these still form the bulk of the houses in the Ramsgate/Findlay/Hewson/Cawley Streets block. These areas contain a number of examples of New Zealand's first state houses and represent a **high social and historic significance both nationally and for the community of Ellerslie**. These are the key reasons the area is recognised through the existing Special Character overlay. Removal of this overlay would permit the loss of this highly-valued heritage, a heritage of which residents are proud, causing an irreversible and unarguable loss to residents and the wider community.

The houses on Hewson and Findlay Streets also share a uniformity of shape that has been strictly and consistently protected by Council planners as they recognise that blocks of similar, intact design and quality are rare and greatly add to the amenity value of the area.

In addition, the consequences of more intensive development around Ellerslie on an aging and already problematic infrastructure will be immense. Included in the catchment are 10- and 100-year flood plains which proved disastrous for a number of residents of the Cawley/Hewson/Findlay Street area in particular in recent rain events.

On a related point, the deposits of lava and scoria underneath Ellerslie as the result of volcanic eruptions present issues for multi-development. For example, it is known that a large multi-unit development currently under construction in Ellerslie has experienced problems with water infrastructure and solid rock. Please contact us if you would like clarification on this point.

Finally, we are concerned that the parking component of the NPS-UD was not consulted upon. On-street parking in Ellerslie has been limited for some time due to people parking in the residential area to take the train and walk to the business parks on the west side of the station. Allowing intensive development without parking will only make this problem worse. This consultation should have allowed residents to express concerns about parking availability in specific areas of the city. We therefore request **coordinated action with Auckland Transport to ensure that parking in residential areas remains available to residents to the greatest extent possible.**

Attached to this submission are two documents which validate the significance of the Special Character Overlay in the Ramsgate/Findlay/Hewson/Cawley Streets block.

The first is a Report presented to Parliament in 1909 by the then Minister of Labour, the Hon J.A. Miller on the work undertaken under the provisions of the Workers Dwellings Act ([AtoJs Online > 1909 Session II > H-11b WORKERS' DWELLINGS \(REPORT ON\), BY THE HON. THE MINISTER OF LABOUR.](#) Downloaded 24/04/22).

The second is a Heritage Evaluation Report prepared in 2017 by the Heritage Unit , Auckland Council This Report primarily provides the rationale for classification as an Historical Heritage area of housing in Hobsonville. Appendix 4 A Comparative Analysis, pages 38 and 39 identifies the special character nature of the Ramsgate/Findlay/Hewson/Cawley Streets block houses, along with several other areas. (Clarks Lane Historic Heritage Area, Heritage Unit, Auckland Council, June 2017. Downloaded 24/04/22).

In summary, the Ellerslie Residents Association believes that the NPS-UD **has sufficient potential for the development of affordable housing without** the loss of Auckland's heritage that **removing Special Character areas** entails.

The ERA strongly advocates for the following

- **retention of the Special Character Overlay as a Qualifying Matter on the entire Ramsgate/Findlay/Hewson/Cawley Streets block.**
- **lowering the threshold** proposed for residential character areas to be **retained as qualifying matter from 66% of the area to 50%.** Doing so will retain small but significant areas of Auckland's heritage without significantly reducing the potential supply of affordable housing. Alternatively, if we retained the 66% level but included properties that scored 4 and above (instead of the current 5 and above), much more of the history and character of our local areas would be preserved.
- **action with Auckland Transport to ensure that parking in residential areas remains available to residents to the greatest extent possible.**

Yours faithfully,



Glen McCabe
Chair, Ellerslie Residents Association