



SUBMISSION ON PLAN CHANGE 78 BY DEVONPORT HERITAGE

Introduction

1. My name is Margaret [Margot] Jane McRae. I have lived in Devonport for 40 years. I am a member, and Chairperson, of Devonport Heritage 2017 Incorporated (**Devonport Heritage**). I am authorised to give this evidence on behalf of Devonport Heritage.
2. Devonport Heritage is an incorporated society with currently 256 members. The original Devonport Heritage Incorporated was formed in 1994 to advocate for heritage protection rules in the first North Shore City Council's District Plan. Devonport Heritage Incorporated was succeeded by Devonport Heritage in 2017. Devonport Heritage has continued to advocate for protection of heritage values in Devonport, particularly including advocating (successfully) for heritage protection rules to be included in the Auckland Unitary Plan (**AUP**), this Plan Change 78 (**PC78**), and the associated Plan Change 82 (**PC82**), as part of an ongoing battle to ensure that the heritage values of Devonport are protected for the benefit of existing and future generations.
3. Devonport Heritage will present expert heritage and planning evidence at the PC78 (and subsequent PC82) hearings to support its efforts to protect Devonport's heritage values.
4. A document entitled "*Historic Heritage Evaluation – Devonport Historic Heritage Area*" dated September 2022 (**HHA Report**) was commissioned by Devonport Heritage and was lodged with Council as part of Devonport Heritage's submissions on PC78 and PC82. The HHA Report will be presented as evidence at the PC78 (and PC82) hearings. The HHA Report is relevant to that part of Devonport Heritage's submission on PC78 which supports the protection of the heritage values of Devonport's commercial business area.

Summary – Outcomes sought by Devonport Heritage

5. Devonport Heritage is a member of Character Coalition Incorporated (**Character Coalition**) which has lodged a submission on, and will present evidence in relation to, PC78. Character Coalition will address heritage values over all of Auckland, of which Devonport is just one part. Devonport Heritage supports the submission and evidence of Character Coalition and will not address the broader issues being addressed by Character Coalition. In particular, we join Character Coalition in their support for Council including the Special Character Area Overlay as a qualifying matter. Devonport Heritage's interests are limited to protection of

the heritage values of Devonport (defined as the geographical area comprising the Devonport peninsula with its northern boundary running from Narrowneck Beach along Seabreeze Road).

6. Devonport Heritage seeks the following specific primary outcomes from the PC78 hearing:
 - a. Retention of the Special Character Area Overlay applicable to Devonport as notified in PC78 (**Devonport SCA**) specifically including:
 - i. that part of the Devonport SCA which applies to the residential zones within Devonport;
 - ii. that part of the Devonport SCA which applies to the Devonport Town Centre Zone and other business zones.
 - b. Extension of the SCA to include those areas of land within Devonport which are zoned for residential purposes but which are not currently subject to the Devonport SCA.
 - c. Retention of the 9m Height Sensitive Area around the volcanic cones which applied under the AUP prior to notification of PC78.
 - d. Retention of the provisions which provide that the SCA rules take precedence over the underlying zone rules.
 - e. Creation of an Historic Heritage Area applicable to that part of the Devonport Town Centre Zone identified in the HHA Report as being appropriate for inclusion within the proposed Devonport HHA.

Summary – Heritage values and concerns

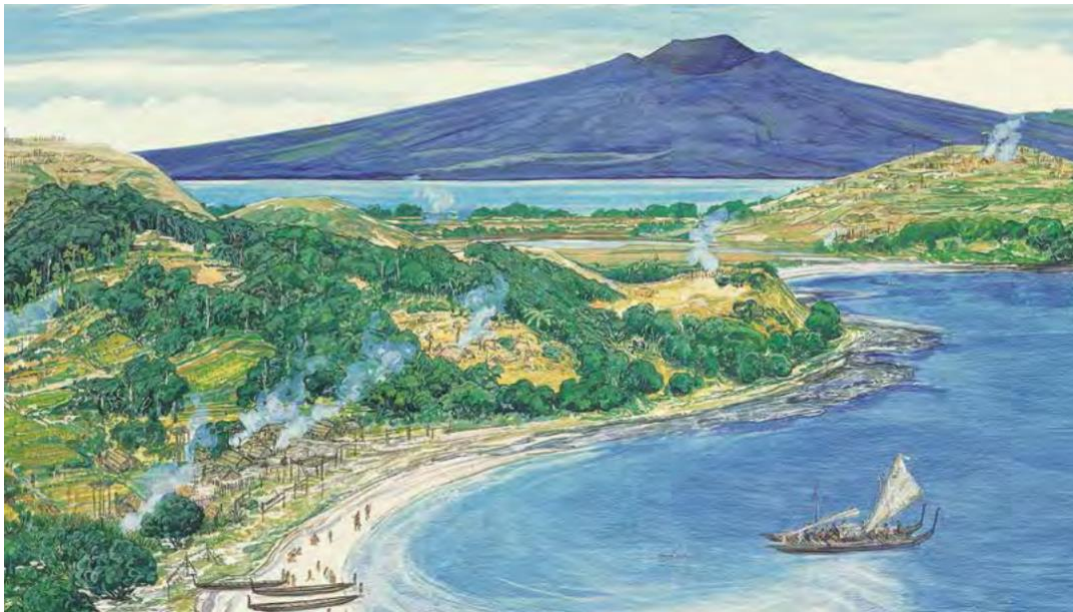
7. The history and heritage values of Devonport, particularly in relation to Māori history/heritage values and residential history/heritage values, have previously been canvassed at length and in great detail, particularly in the course of the AUP process which resulted in the current operative AUP provisions which protect Devonport's Māori and residential heritage values. That information is all held by the Council and we presume it is available to the Panel conducting this hearing. That process and background is reflected in the Devonport SCA which Devonport Heritage supports. That background will not be repeated, because it is reflected in the Devonport SCA, except very briefly as follows.

History

8. Traditional sources and archaeological research records that Māori occupation extends back to the arrival of the canoes of the first migration about the year 925AD. Some canoe crew members remained and settled on the Devonport land and became known as Ngāti Tai. Many later tribes, including Ngāti Paoa and Ngāti Whatua, came and went from the

peninsula, fishing, growing crops and building the fortified pa on Takarunga and Maungauika.

9. In 1827 Captain Jules Dumont D’Urville anchored his ship the Astrolabe off a sandy shore in Tamaki Makaurau, climbed Takarunga/Mt Victoria and marvelled at what he saw – three striking volcanic cones, Māori whare dotted near the shoreline and a 360 degree view of the Waitemata and its surrounds.



10. The European history of Devonport, which resulted in the current Devonport Town Centre and its surrounding residential neighbourhoods, is summarised on pages 8-16 of the accompanying HHA Report.



11. Devonport's housing is largely comprised of kauri cottages and villas from the 1870s through to the 1890s. The simple, practical cottages of Anne and Buchanan streets date from the earliest subdivisions near the village centre while the larger Victorian villas spread out from there as Devonport prospered. Many were built from stock plans and were designed to be seen from the street, set behind picket fences and gardens. This uniformity of design gives the streets their pleasing homogeneous quality still very apparent today. In the 1920s came the bungalows and transitional villas often built from rimu and matai. With their simple roof forms and design they reinforced the harmony of the villas and cottages. Together these painted timber houses of the 19th and 20th centuries give Devonport its consistent and distinct character.



12. Devonport remains a geographical marvel – almost completely surrounded by sea, with its two volcanic cones (a third cone lost to quarrying), four sandy beaches, the green mass of the Waitemata golf course and 2,685 mainly 19th century timber houses.
13. Over 300,000 visitors a year come to Devonport and see something that has endured for almost 200 years - the strong relationship between the maunga, the sea and the human occupation and development. It is this relationship that makes Devonport such a striking and interesting place. Visitors marvel at the views and the beaches but also at the built character of the area, the sheer volume of old houses – street after street of them, and the historic Devonport Town Centre/business area.
14. To live here is to feel a connection to the past, both Māori and European, more so than in any other part of Auckland. This has produced a dedication to Devonport by the people who live here.

15. We view the Devonport SCA as the primary means of retaining Devonport's historic heritage values. Now after almost 30 years that protection is threatened.

Effects of PC78 on Devonport

16. We support the plan change to the extent it allows the SCA to be left in place for 90 percent of Devonport. It shows the heritage richness of the area that so much is proposed to stay in the SCA.
17. However we believe that the loss of the SCA from the remaining 10 percent of properties will have a profound impact on Devonport's heritage landscape. This would lead to older homes being replaced by modern structures without the requirement to be in sympathy with the heritage surrounds.
18. The Mixed Housing Urban (MHU) Zone sites will allow three dwellings of three storeys to be built close to the boundaries which will create a visual conflict with, and be inconsistent with, the height and bulk of the adjacent heritage houses. This will have a hugely destructive effect on the whole heritage streetscape and value of Devonport to Auckland.
19. We do not claim that every dwelling in Devonport is a heritage building. There are many brick and tile flats and non-heritage houses dotted among the villas, bungalow and cottages. However, the scale of most of these non-heritage buildings does not challenge the streetscape and overall heritage values. A character area is created when the majority of buildings follow a similar pattern of scale, density and detail. Randomly located intrusions of dense, three storey blocks will destroy this cohesion which creates the SCA.



Methodology

20. The Council's methodology of scoring individual buildings to gauge heritage worth has value as far as it goes, but it does not result in a full assessment of the relevant heritage values. In particular it does not address, or take any account of, the extent to which the character of an area derives from the relevant collection of buildings and all of their surrounds. In many cases the surrounds are of importance equal to, or more than, the individual buildings.
21. We will submit expert heritage evidence on the defects of this methodology, and the extent to which this methodology does not fully assess and protect the relevant heritage values.
22. We will show examples demonstrating that, where this methodology is used to enable the removal of the SCA and the introduction of the MHU zoning, there will be an adverse effect on the heritage values of the neighbourhood.
23. This is particularly harmful in such a small and geographically distinct area like Devonport. Allowing the MHU zone in any part of Devonport will defeat the purpose of actually having an SCA.

Little Gain

24. The numbers show that this destruction of heritage character will create the possibility of only 339 more dwellings in Devonport. Because of the high land values these would be far from affordable.
25. According to Council's own figures there is already plenty of capacity for future housing growth in the AUP, so allowing the MHU zone in Devonport is essentially unnecessary.
26. Yet the implications of the loss of character is an enormous price to pay for such a small return. The cost of this loss of character is too high for the smallest of housing gains.

Height

27. Devonport is a suburb of traditional two storey houses and this tradition has been entrenched by the 9 metre height sensitive limits around the two volcanic cones.
28. The enduring relationship between the maunga, the sea and the old houses is the most remarkable feature of Devonport. It gives the suburb its uniqueness and beauty.



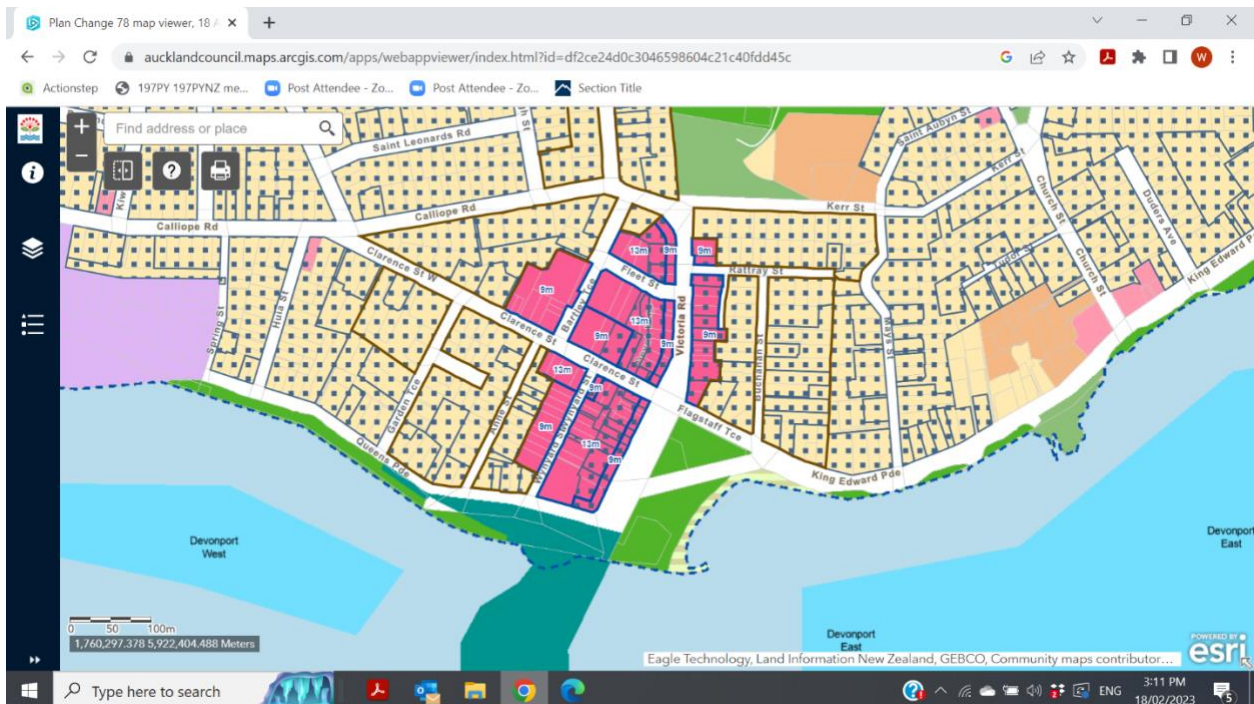
29. This is particularly evident when arriving by ferry from the city where the views of the houses nestled around the two volcanic cones, with Rangitoto in the distance, have become an iconic Auckland view. To weaken these height overlays on even a few sites, would have a significant adverse effect on Devonport's urban landscape heritage.
30. We support the Council's determination to continue these height restriction overlays.

Town Centre and its Surrounds

31. The Devonport Town Centre is at the heart of our historic marine suburb. Victoria Road is a highly intact Victorian and Edwardian main street and has a rich and well-documented history. It includes 21 scheduled historic heritage buildings within a 400 metre strip.
32. Auckland Council and Heritage New Zealand consider that Victoria Road is eligible for registering as an Historic Heritage Place but neither have had the resources to carry out the necessary research.
33. So Devonport Heritage has done the work for them and produced a thorough and expert HHA proposal that we include in our submissions on PC78 and PC82. The HHA Report:
 - a. provides evidential support for retention of that part of the Devonport SCA applicable to the Devonport Town Centre;
 - b. provides the evidential foundation for creation of the HHA proposed in the HHA Report covering the area shown below.



34. We note that the proposed HHA largely matches the part of the SCA which extends over the Devonport Town Centre area, as shown below. The discrepancies between the two will be addressed in evidence at the hearing.



Summary

35. Devonport is a special place - a valuable place for all New Zealanders and those hundreds of thousands of international visitors who flock here every year.
36. Its value lies in its history, its physical beauty and its built heritage. It is a remarkable place full of history and beauty.
37. The great cities of the world respect and protect such treasured places and we believe Auckland too should continue to protect this taonga.
38. So we ask you to retain and extend the SCA as detailed above, to approve an HHA for the main Victoria Road historic town centre, and to keep this treasured place safe for future generations.

Margot McRae
Chairperson of Devonport Heritage

20 February 2023