

Under Part 1 of the Judicature Amendment Act 1972

<u>IN THE MATTER</u>	Of the Resource Management Act 1991
<u>BETWEEN</u>	<u>URBAN AUCKLAND – THE SOCIETY FOR THE PROTECTION OF AUCKLAND CITY and WATERFRONT (INCORPORATED)</u>
	Plaintiff
<u>AND</u>	<u>AUCKLAND COUNCIL</u>
	First Defendant
<u>AND</u>	<u>PORTS OF AUCKLAND LIMITED</u>
	Second Defendant
FIRST AFFIDAVIT OF GRAEME CLEMENT SCOTT IN SUPPORT OF URBAN AUCKLAND 31 MARCH 2015	
Solicitor for Plaintiff: Mr Geoffrey Hardy Madison Hardy ADDRESS Ph: (09) 3790200 Fax: (09) 3790504	Counsel for Plaintiff: Julian Miles QC Richmond Chambers Ph: (09) Fax (09) Email:

I **Graeme Scott**, of Auckland, Architect, swear:

Introduction

1 My full name is Graeme Clement Scott. My experience as an architect is attached in Schedule 1. In summary I have 40 years professional experience. I am a registered architect with an annual practising certificate. I have an Honours degree in Architecture from the University of Auckland.

I am a Fellow of the New Zealand Institute of Architects Inc.

2 I am a director of ASC Architects Ltd in Auckland.

3 I am the chairman of the Urban Design Forum. The Urban Design Forum has a cross-disciplinary membership of professionals involved in the design of the built environment, and its purpose is to promote good urban design outcomes.

Auckland's connection to the sea

4 The urban design community in Auckland contains a variety of opinions about the future of the Port operation in downtown Auckland on a key waterfront site. This variety is probably not dissimilar to that found in the wider Auckland community. However, there is widespread concern among those involved in urban design over the process that has been followed to grant Resource Consent to the proposed Bledisloe Wharf extensions, and the effect of those extensions on blocking the view outwards from the inner harbour as viewed from the northern end of Queens Wharf.

5 Auckland's sense of its place in the world is very distinctly of its being a major city in the South Pacific Ocean. The connections to the oceans that surround it are key to understanding Auckland's past, its present condition and its future, especially the connection out to the islands of the Hauraki Gulf and the Pacific Ocean beyond. The

complex interweaving of land and sea around the urban area of Auckland is fundamental to the image of Auckland and its attractiveness as a place to visit, live, work and play.

- 6 For the whole of my professional career, there has been a goal of forging a stronger urban connection to the sea in general, and the harbour in particular. This goal has been pursued in many places around coastal Auckland, but the main goal has been to connect the city centre to the water. Substantial progress has been made over the last 20 years, usually in relation to a major event. The Viaduct area was opened up to public access and substantially redesigned for the America's Cup yacht races, and that led onto redevelopment of Wynyard Point, with an impetus provided by the Rugby World Cup in 2011. Aucklanders have responded with an overwhelmingly positive endorsement of these key moves.

The city to harbour connection

- 7 These developments left the actual connection of our main street, Queen Street, to the harbour unresolved. It was not until recently when Queens Wharf was purchased from the Port by the Council, that the dream of completing a major public space to connect Queen Street to the water came closer to fulfilment. There have been many design proposals for Queens Wharf, and almost all include a significant public facility at its northern end, capturing the visual connection down the harbour past Devonport and North Head to Bean Rock lighthouse, Browns Island and beyond.
- 8 I consider the view down the wider harbour toward Browns Island from this viewpoint has real and substantial value to Aucklanders, and that it will become important to the design of any future public space, building or structure on Queens Wharf in ways that we cannot imagine or foresee at this time. It is possible to argue a case, usually

an economic one, against protection of viewshafts. However, in Auckland there are many viewshafts such as those to the volcanic cones that have retained protection over decades, and there is a general acceptance that they are worth protecting.

- 9 One of the understandings arising out of the development of the Proposed Unitary Plan was that the inner harbour is the key open space in the central city, and I would suggest an extension of this principle to conclude that the wider harbour is the defining open space of Auckland. The viewshaft linking these two parts of the harbour from what will become the city's landmark viewpoint at the end of Queens Wharf demands urgent protection.

The photographs

- 10 I have examined the photo-images prepared by Gavin Lister in his affidavit depicting the visual impact of the proposed extensions from both Princes Wharf and Queens Wharf. I confirm they accurately depict the blocking of the views from those viewpoints, and in particular the blocking of the view from the end of Queens Wharf of the harbour beyond Devonport toward the south as a result of the proposed extensions.

Conclusion

11 I consider the proposed wharf extensions have significant negative visual effects on the important public view from Queen Wharf to the wider harbour beyond Devonport, and that urgent action is required to halt the extensions and to protect the view.

SWORN at Auckland this day of before me:		
		Graeme Clement Scott
A Solicitor of the High Court of New Zealand		

SCHEDULE 1

Graeme Scott.

I have been a registered architect for 35 years, and a director of ASC Architects Ltd (or its predecessors) since 1981. I have completed many commercial, corporate and community buildings around New Zealand. ASC Architects currently employs 45 people. I am a member of Auckland Council’s Urban Design Panel, and I chair one of the two Hobsonville Design Review Panels on behalf of the Council. I have had numerous roles within the New Zealand Institute of Architects, including Secretary, National Awards Convenor, and chair of the Auckland Urban Issues group. I am currently chair of the Ethics Review Committee for the NZ Registered Architects Board.