

## **Property Council New Zealand**

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# **Submission on Auckland Council's Draft Manaaki Tāmaki Makaurau – Auckland Open Space, Sport and Recreation Strategy**

10 March 2025

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Auckland Council

Manaaki Tāmaki Makaurau – Open Space, Sport and Recreation Strategy project team

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## **Submission on Auckland Council's Draft Open Space, Sport and Recreation Strategy Policy 2025**

### **1. Summary**

- 1.1. Property Council New Zealand ("Property Council") welcomes the opportunity to submit a response to Auckland Council on their [Draft Manaaki Tāmaki Makaurau – Open Space, Sport and Recreation Strategy 2025](#) ("the Draft Open Space Strategy").
- 1.2. The Draft Open Space Strategy has broad principles with limited detail around implementation and financing the strategy. We are concerned that the implications will fall onto development contribution fees, impacting the feasibility of development, and encourage Auckland Council to investigate alternative options such as partnering with the private sector.

### **2. Recommendations**

- 2.1. At a high level, Property Council recommends that Auckland Council:
  - Delete the unachievable proposal to *"Make all of Tāmaki Makaurau our backyard"*;
  - Shift the 'benefits-led approach' to an 'evidence-based approach' with a particular focus around the need for investment and ability to maintain that investment;
  - Amend the Draft Open Space Strategy to include the opportunity to collaborate with the private sector to establish new parks, particularly in greenfield areas;
  - Amend bullet point two on page 11 to state: *"Prioritise acquiring new parks in high-density areas and new greenfield areas. This could include collaboration with the private sector"*;
  - Encourage the Open Space project team to gain a better understanding on how planning rules can restrict or disincentive innovation;
  - Partner with others (mana whenua, community i.e. sports clubs and developers) to collectively deliver local and regional outcomes and alternative funding streams;
  - Develop clearer criteria for developer partnerships; and
  - Delete the per capita/capacity focused option and instead build in more flexibility to Option 1 with reference to walkable catchments.

### **3. Introduction**

- 3.1. Property Council is the leading non-for-profit advocate for New Zealand's most significant industry, property. Our organisational purpose is, "Together, shaping cities where communities thrive."
- 3.2. The property sector shapes New Zealand's social, economic, and environmental fabric. Property Council advocates for the creation and retention of a well-designed, functional, and sustainable built environment, to contribute to the overall prosperity and well-being of New Zealand. We aim to unlock opportunities for growth, urban development, and productivity to improve New Zealand's prosperity.

- 3.3. Property is Auckland's largest industry. There are around \$997.8 billion in property assets across Auckland, with property providing a direct contribution to GDP of \$13 billion and employment for 87,080 Auckland residents.
- 3.4. We connect property professionals and represent the interests of 388 Auckland based member companies across the private, public, and charitable sectors.
- 3.5. This document provides Property Council's feedback on Auckland Council's [Draft Manaaki Tāmaki Makaurau – Open Space, Sport and Recreation Strategy 2025](#) ("the Draft Open Space Strategy"). Comments and recommendations are provided on issues relevant to Property Council members.

#### **4. Strategy on a Page**

- 4.1. The Draft Open Space Strategy outlines its "Strategy on a Page." While many of these strategy statements are broad in nature, we are concerned with the proposal to: *"Make all of Tāmaki Makaurau our backyard."* Given the geographic nature of the Auckland region, we would support a more realistic and achievable goal that focuses on current park maintenance and future open space opportunities, particularly through partnership arrangements.
- 4.2. Property Council also notes our concern around taking a "benefit-led approach" to improve the wellbeing of people, places and the environment. We would support a shift in focus towards an evidence-based approach, based on a needs assessment coupled with financial prudence and ability for Auckland Council to maintain investment through general rates.

#### **5. "Make all of Tāmaki Makaurau our backyard"**

- 5.1. Property Council would like this heading within the Draft Open Space Strategy to be replaced with "Where we are heading".
- 5.2. Property Council supports the intention to continue to provide new high-quality open spaces to keep pace with growth. However, providing new open spaces needs to consider a range of factors from feasibility through to a needs assessment and ability for Auckland Council to provide for ongoing maintenance across the entire park programme.
- 5.3. Property Council encourages Auckland Council to look to partner with the private sector to enable parks when designing communities and establishing opportunities to acquire and/or obtain new parks, particularly in greenfield areas.
- 5.4. We recommend amending bullet point two on page 11 to state: "Prioritise acquiring new parks in high-density areas and new greenfield areas. This could include collaboration with the private sector."

#### **6. Innovative open spaces in high-density areas**

- 6.1. Property Council supports Auckland Council working with Auckland Transport to embed and accelerate emerging practices that enable using civic squares, streets and carparks for people-centred activities and greening the city. In the past, Property Council has supported the Targeted City Centre Rate contributing towards the beautification of streets and upgrading existing civic squares. Any future development of civic squares needs to be done in close

collaboration with local businesses to ensure unintended consequences and business disruptions are minimised.

- 6.2. The Draft Open Space Strategy seeks to encourage private developments to better provide private open space, such as rooftops, for play, sport and recreation. Auckland's planning rules would need to enable rooftop open spaces in order to align with the Draft Open Space Strategy. However, it is important to note that the complexities of development such as District Plan rules, feasibility restraints (additional build costs and regulations), development contribution fees, and the typology of the development (i.e. emergency and social housing, affordable housing, build to rent, or private ownership) will impact developer decisions around open space rooftops.
- 6.3. We encourage Auckland Council's Open Space project team to gain a better understanding on how planning rules can restrict or disincentive innovation by engaging with the private sector.

## **7. Enhance Auckland Council's response to climate change**

- 7.1. Property Council supports Auckland Council developing their blue-green network to better manage stormwater. Prioritising investment to make Auckland greener and spongier should continue to be a focus within the Long-Term Plan and working with Government to develop smart solutions to stormwater catchments within parks is a positive thing.
- 7.2. We support proactive measures to address climate disruption and acknowledge the importance of open spaces as essential infrastructure for enhancing Auckland's climate resilience. We know from experience that natural hazard risks can be mitigated through careful design, planning, and infrastructure. There were many examples of effective planning and design protecting medium density housing developments during the 2023 Auckland floods.<sup>1</sup>

## **8. Benefits led approach principle and development contribution fee increases**

- 8.1. Property Council is concerned that a 'benefits-led' approach to improve the holistic wellbeing of people, places and the environment will take priority over an evidence and needs-based approach. A benefits-led approach is an extremely wide investment principle that could see development contribution fee increases significantly.
- 8.2. The Draft Open Space Strategy states: "[We] take a long-term view of costs and benefits to recognise that investment decisions may have an intergenerational impact". Property Council continues to oppose Auckland Council's 30-year funding and financing model. Our past submissions cite concerns around complexity, accuracy, and intergenerational equity.
- 8.3. Page 21 of the Draft Open Space Strategy states "...while acknowledging that general rates and development contributions will continue to provide most of the funding." Auckland Council's recent development contributions draft policy proposed increases in the average development contribution fee per household of up to 289 per cent. This will have direct effects on reducing housing affordability, limiting intensification and decreasing the number of homes developed, including first-time buyer homes and those built by social and affordable providers. We are

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<sup>1</sup> <https://www.stuff.co.nz/life-style/homed/real-estate/131559591/the-medium-density-housing-developments-that-defied-the-auckland-floods--this-is-how-they-did-it>

concerned that the high number of proposed new parks will result in even more development contribution fee increases which will impact development decisions.

- 8.4. Development contribution fees should not be a revenue stream that Auckland Council relies on, particularly given recent Government announcements signalling the removal of the four-wellbeings within the Local Government Act.<sup>2</sup> A more pragmatic approach would be to partner with others (mana whenua, community i.e. sports clubs and developers) to collectively deliver local and regional outcomes and alternative funding streams.

## **9. Open space provision and acquisition of land**

- 9.1. Auckland Council should develop clearer criteria for developer partnerships. For example, clearer expectations for developer contributions toward open spaces will better enable certainty and appropriately placed locations. We recommend Council develop clearer criteria for developer partnerships.
- 9.2. Table 15 should provide more concrete information on the acquisition of land subject to natural hazards. We understand the requirement for a case-by-case risk assessment and note that often land subject to natural hazards is most suitable for open spaces.

## **10. Plan for the provision of high-quality open space network that meets the needs of Aucklanders and celebrate our cultural landscapes**

- 10.1. We believe that the two proposed options are too rigid when it comes to open space. We recommend deleting the per capita/capacity focused option (as it can be difficult to predict) and instead build in more flexibility to Option 1 with reference to walkable catchments.

## **11. Conclusion**

- 11.1. The Draft Open Space Strategy has broad principles with limited detail around implementation and financing the strategy. This will create uncertainty for the private sector and may negatively impact development. We recommend greater transparency around the funding and financing of open spaces occurs.
- 11.2. Property Council members invest, own, and develop property in Auckland. We thank Auckland Council for the opportunity to provide feedback on the draft strategy. For any further enquiries, please do not hesitate to contact Katherine Wilson, Head of Advocacy, via email: [katherine@propertynz.co.nz](mailto:katherine@propertynz.co.nz) or cell: 027 8708 150.

Yours Sincerely,



Martin Cooper  
Auckland Regional Chairperson  
Property Council New Zealand

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<sup>2</sup> <https://www.beehive.govt.nz/release/government-getting-local-government-back-basics>