

To Ministry of Business, Innovation and Employment

Attention Urban Development Authorities consultation

Email [UDAConsult@mbie.govt.nz](mailto:UDAConsult@mbie.govt.nz)

## **Submission on the proposed Urban Development Authority Legislation**

From the Friends of Regional Parks (Auckland) Inc

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The Friends of Regional Parks (Auckland) Inc was formed in 2010 with the objective of supporting the Regional Parks network that is such a vital asset in maintaining and enhancing the health of both Auckland's residents and the regions biodiversity. Our membership includes Auckland residents and organisations along with the Federated Mountain Club with its extensive countrywide membership. We represent approximately 30,000 New Zealanders.

The Friends of Regional Parks are deeply concerned that there is a lack of a coherent plan and provision for funding the necessary increase in the Regional or Local Park land to maintain the adequacy of Auckland's parks inline with the Stats NZ prediction of more than a 50% increase in Auckland's population by 2043. The current rate of increase would see a 25% increase in less than a decade.

In view of the above we submit that as a minimum the proposed Urban Development Authority legislation must include the requirement that any action by an Urban Development Authority or use of the powers granted to such an authority **does not result in a net reduction in the amount or quality of parks or reserve land** or to the ratio of such land to the population.

Parks must be treated as essential infrastructure for any well-planned, world-class city.

Any parkland used for other purposes must be replaced by new parkland within a year and this provision should be included in the legislation. We would prefer that all parkland is off limits for development in perpetuity - as is envisaged by its original vesting as parkland under the Reserves Act.

Our second submission point concerns the proposed provision in the legislation that a UDA would have the power to override existing and future district and regional plans. We submit that this provision is undesirable and should not be included in the legislation for the reasons below:

1. Granting such powers to a non-elected authority would be seen as undermining the democratic processes on which our country prides itself.

Public opportunity to engage in consultation and input to the district and regional plans that affect the quality and nature of the environment in which they live is being treated with scant respect.

2. The objective of regional and district plans must be to ensure the best living environment for a district's residents is based on the development of a consistent and logical plan developed after consideration of the particular circumstances relating to an area and the public's input. Therefore the overriding of these plans by an Urban Development Authority potentially less familiar with the issues relating to a district would be inconsistent with the need to maintain a coherent, consistent long term plan to achieve the best outcome for a city or region and could lead to ultimately detrimental outcomes.

3. Certainty with planning rules for developers, property owners, landowners, local authorities, the government and the public is essential in a well functioning society. Certainty saves

money, enables forward planning and provides confidence. Having an unelected authority able to override planning rules at any time in any way provides uncertainty and instability and will negatively affect both the economy and the management of our cities. It is not an appropriate way to behave in a civilised civic society. Auckland has just been through an incredibly expensive and time consuming Unitary Plan process to provide that certainty. It cannot afford to have this destabilising random influence imposed on it, and nor can the rest of the country.

Signed

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