Thank you for the opportunity to make a submission. I agree with the need and direction of having a National Policy Statement on Urban Planning. I wish to concentrate on the lack of direction in the planning and provision of parks and open space especially in Auckland. Such open space provide many of the amenities and infrastructure essential to a functioning city and urban area. This is especially the case in a anthropocene, post industrial world.

I am a retired former park manager with a master of science who spent 30 years in local government and 50 years in parks and community activity. More recently I’ve been volunteering for parks and open space advocacy and for the maunga in Auckland and Friends of Regional Parks. I have represented NZ at International Parks Ranger Congresses and worked in overseas protected areas.

The provision of open space and all the amenities that a modern city needs are not adequately covered in the discussion document. Open space is only mentioned once on P 27.

The term amenity values needs redefinition to include bottom lines in standards. Guidelines and standards are needed in both the natural and physical qualities and characteristics. This is especially needed in the complex area of conservation, recreation and cultural amenities. Central to the standards are issues of equitable access to services and amenities. There needs to be visionrary statement and standard to ensure every NZer have easy, walking access to a green space in the area they live in.

In answer to Question 5

- Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?

Yes I support proposals to clarify amenity values. However specific proposals are also needed on open space and parks. There is a lack of attention, data and an indication of inequity in the provision of open space especially in urban areas.

- Do you think these proposals will help to address the use of amenity to protect the status quo?

At present and unless changes are made the status quo will continue and there will be a decline in parks, the provision of parks, inequitable access to open space and amenities they provide. There is a need for basic standards. As mentioned above an
aspirational statement is needed to ensure every NZer has **easy, walking access to a green space in the area they live.**

Over all the economic system governing the provision of amenities and provision of parks and open space has to change and far greater discussion is needed.

An example of the dysfunctional situation is the change of use of Chamberlain Park in Auckland where bitter controversy has resulted and a small vocal sport group has dominated the planning process and a large area of publicpark. This results from lack of Unitary Plan and central government guidance in park planning especially at the local area. In addition there is no provision for future planning of regional parks and the change needed in parks going towards the 22nd century.

Other data and on use of open space from DoC and the recent Review of the Walking Access Commission need to be taken into account.

---

**Can you identify any negative consequences that might result from the proposed objective and policies on amenity?**

The provision on open space [and the amenities and infrastructure put in them. See below for a list] need greater bottom line guidance or minimum standards. These should relate to the various types of public open space and amenities that are provided. This applies especially to Auckland.

With the Auckland Council the various non-statuary Park and Open Space Strategies have not helped and are hard to follow and implement. They should be made statutory requirements. The result seems to be that recreation is dominated by organised activity and overall recreation and passive activity is neglected. Sport groups and organised recreation can dominate resources and public parks land yet such recreation is less than 20% of all such activity. [Ministry of Culture and Recreation and Sport NZ data]

1 I’m concerned that the Beca M for E supporting document on parks and open space only looks at the economic aspects and ignores the complexities of access and wider cultural and environmental values E.g. See attached map below on walking distance provision targets for neighbourhood parks Auckland. This shows the lack of access to a park within the 600m walking guideline. Some areas are well served and others not. New approaches are needed with infill housing and a more dense population. Your Beca report referred to the Auckland Council's economic report on property and parks but the Chief Economist David Norman was sceptical of the results. This illustrates the poor data and analysis of our open space and parks system. The main problem is treating all parks and open space as one and not including the great variety of amenities and functions E.g. Conservation to intensive community buildings on sports grounds.

2 The carrying capacity and multi-use of open space, parks and amenity areas are not being considered. Conflicts are increasing on this limited resource. E.g. Limiting access to parks due to biosecurity [kauri die back]; archaeological /cultural
protection as against planting native trees[ maunga in Auckland]; sport against passive recreation etc [ E.g. Chamberlain Park issue in Auckland].

The Independent Hearings Panel on Auckland’s Unitary Plan said; “The Panel accepts that open space will be under greater pressure from a growing and more dense Auckland, and that as a result open space will need to be multi-functional”

A stage for conflict and division is being set without public discussion of the social impacts of crowding more people into smaller green public park space. “Multi-functional” and the conflict that can develop was never defined or given guidance in the objectives, policies or zone rules.

Again bottom lines and basic guidelines are needed especially where intensification of use in parks is occurring in existing urban areas.

3 Existing planning systems have ignored the provision and need for regional parks especially in rapidly growing areas. Regional parks were established to get urban populations easy access to rural areas as well as enable recreation and conservation values. They also increase understanding of countryside, agriculture production and heritage.

Over decades DoC and central government have ignored Auckland in not providing large multi-use public parks and equitable access to open space. This was the original reason regional parks were established in Auckland but they are not a priority for the new Auckland Council. There is a inequitable distribution of DoC parks in NZ with the reliance on regional parks to fill the gap. DoC focuses on conservation and restricted access open space. Many of the DoC islands near Auckland do not have easy access. Consider the cost of taking a family to Rangitoto or Tiritiri Matangi? There is an argument that it may be easier for Aucklanders to fly to Australia to get easier access to such large natural areas rather than visit the southern national parks in New Zealand. This is especially case with much of the Waitakere and Hunua Ranges Regional Parks now closed to public access due to kauri die back.

4 The urban rural divide will increase under present policies limiting access to urban people to countryside and nature. The consequences will be more social and political division between urban and rural sectors of the country. In addition there is growing importance of the green space to wellbeing and urban living that is not being meet under present policies. [ see Review of the Walking Access Commission 2019 and Health Indicators of sustainable cities in the Context of the Rio+20 UN Conference on Sustainable Development Initial findings from a WHO Expert Consultation: 17-18 May 2012]

-Can you suggest alternative ways to address urban amenity through a national policy statement?

1 Have better bottom lines definitions of open space including the private and public spaces. Some private land is now put aside as semi-public with many overlays of protection e.g. Significant ecological areas, significant landscape etc. Some private land gives restricted public access can provide access and park amenities if significant changes are made based on European models. On the other
hand present public land conserved for conservation and recreation may have less public access due to restrictive conservation purposes. The divide is growing and needs discussion, resolution and addressed in a NPS.

2 Have better bottom lines definitions of amenities covering physical heritage and natural heritage.

3 Have a high level aspirational statement / standard to ensure every NZer has easy, walking access to a green space in the area they live as well have basic contact with nature. The government is including “wellbeing” as part of the country’s direction. This new economic framework covers health and social benefits including contact with nature. This has to be a fundamental requirement in a National Policy statement.

4 Provide better bottom lines for provision of open space and the range of protected areas [using IUCN – International Union for the Protection of Nature classifications]. These are needed for protection of native flora and fauna.

5 Provide for novel ecological landscape. Many parks involving both indigenous and native flora and fauna have high amenity. These should not be excluded in favour of only indigenous. E.g. Deciduous exotics provide better shade over carparks and playgrounds in summer while allowing light and warmth in over winter. Evergreen native species can reduce amenity by shading out these facilities in winter by making them colder and less safe.

6 Separate bottom lines for the wide ranges of reserves and parks from pocket parks [to grow a couple of very large trees] to neighbourhood parks [playgrounds and run around areas on green space] to sport fields and regional type parks. All require different standards not well covered in the various zones in district and unitary plans.

7 Link the NP Statement to a review of the Reserves Act and develop a common classification system to bring it in alignment with the RMA and open space and amenity areas. The present complexity and confusion is adding to local government costs and making management difficult. A new IUCN classification system is needed in dealing with protection and care of flora and fauna and this needs to be more separate from the human based uses of land. Too often these are confused.

8 Clearer definition on what is open space and amenity areas and what is critical infrastructure and how they can be linked. E.g. pipelines, drainage retention ponds and telecoms are often placed in parks and open spaces and can compromise the amenity, aesthetics and use of parks.

9 Guidelines are needed to ensure limitations and carrying capacity on parks and open space as population and intensification increases. Priority needs to be placed on equitable use and as well as compatible use of public open space and facilities.

10 Concept of the Anthropocene Park
At the 2014 World Park Congress and the last International Rangers Congress, which I attended, delegates are recommending 50% of a region’s land and marine
surface be kept mainly for nature. This is more critical now especially in light of climate change. Reserve areas are needed to deal with changing spaces to produce food and live in greater harmony with nature. See Inheritors of the Earth, Prof Chris Thomas, Penguin Random House UK, 2017. In Auckland more large areas need to be set aside from development as reserve areas either as IUCN nature protected areas, agriculture/ horticulture land, regional parks, private reserve land etc, or a combination of these. In other words the RUB needs to be strengthened and more intensive housing developed.

SOME BACK GROUND INFORMATION

Some physical amenities and infrastructure found in public open space and parks
Sport fields in various open space zones in Auckland

Sport fields
Artificial specialised sport facilities and surfaces [can restrict access]
Passive recreation, walking, picnicking, etc
Specialised facilities [e.g. skate parks and play grounds]
Stadiums
Native forest [may limit access and recreation opportunity]
Wetlands [may limit access and recreation opportunity]
Dog exercise areas [Dogs and companion animals a major recreation activity]
Car parks
Roads
Telcom structures and services
Energy and pipeline facilities
Community centres
Community halls
Education facilities
Libraries
Memorials
Farmer market areas
Drainage retention ponds
Cultural and art structures events areas etc
Cafes
Exercise structures/ trails
Camping
Reception and visitor centres
Park furniture
Walking and cycle tracks/paths
Botanic Gardens etc
Service centres
Beauty

DECLINE IN AUCKLAND PARKS
A 2016 report for the Auckland Council “Open Space Provision Policy 2016” suggests a decline in parks through a decrease in access to neighbourhood parks. [seen in the red areas of the attached map]. Little funding is available to local boards
to purchase land and fill in the red areas where parks are needed to meet original standards. Standards seem to be “dumbed down” because of high private property values.

The Independent Hearings Panel on the Unitary plan said; “The Panel accepts that open space will be under greater pressure from a growing and more dense Auckland, and that as a result open space will need to be multi-functional” A stage for conflict and division is being set without public discussion of the costs and social impacts of crowding more people into smaller green public park space. The result is more groups campaigning to keep their space with “community rebellion” seen at Te Arai Beach, Chamberlain Park, Point England and Ihumatao in the South. Letters to the Herald complaining on loosing vehicle access to volcanic cones are another example of the pressures on our parks not being fully appreciated. Complaints may be blamed as NIMBYism but Council and local boards have the difficult task of allocating limited recreation space to a growing and more diverse population.

More alarming the reports to date only cover the more traditional parks such as playing fields, gardens, community buildings and play grounds. They do not cover the need for conservation and ecological parks which are now being recognised as more important for urban and metropolitan areas. An Otago University 2015 Survey on urban children’s connection with nature said “there has been a growing body of evidence that a fragmented human-nature relationship has detrimental impacts on human physical and psychological health”

Change is needed to the present system in providing and managing parks for the 22nd century. It’s important the emphasis is on housing, transport and other infrastructure however parks and open space need to be a greater part of overall infrastructure. Stronger central governance is also needed to bring together the present division amongst many park agencies. These include DoC, Auckland Council, CCO’s, Maunga Authority, local boards and also Treasury who do not seem to consider parks as part of New Zealand’s infrastructure.

Walking distance provision target for neighbourhood parks Auckland Open Space Provision Policy Adopted June 2016 Auckland Council P5

“The policy provides a framework for analysing open space provision within the existing urban area. The red and orange areas are not within the walking distance provision target for neighbourhood parks “– Approx. 600m”. This information can help to prioritise where investment in the open space network should occur, such as improving facilities in an existing park, or acquiring new open space.”

See map next page