



## Submission on Auckland Council's Contributions Policy 2021

**Submitter:** Civic Trust Auckland  
**Contact name:** Audrey van Ryn (Secretary)  
**Phone** (daytime): (021) 035 4431  
**Email:** cta@civictrustauckland.org.nz  
**Postal address:** PO Box 29 002 Epsom Akld 1344

---

1. Civic Trust Auckland (CTA) is a non-profit public interest group formed in 1968 with activities and interests throughout the greater Auckland region. It is a regular submitter on matters of interest to its members, both at a local government level and also on national matters where they may affect the Auckland region. The aims of the Trust include the:
  - protection of natural landforms
  - preservation of heritage in all its aspects
  - encouragement of good planning for the city and region.
2. We note that development contributions are payable at the time of granting of consent to develop land, and that contributions are to recover from those persons undertaking development a fair, equitable, and proportionate share of the capital costs expended on that land's development over time. We note Council points out in its preamble to this consultation that evidence shows increased contributions fees do not cause house prices to rise over time, but are instead reflected in the price developers are prepared to pay for land. We make the point that notwithstanding this, the price paid for land development is ultimately reflected in the price borne by the market.
3. CTA support Council retaining the option of using and investigating other funding sources, and suggests that Council's development contributions policies should make provision in certain circumstances for the levy of contributions to be recorded as a charge against the title of the land, and be recovered either over time or upon sale of the land.
4. We note that Council proposes exempting 'not-for-profit' development on Māori land from reserve contributions. We support this in principle but make the point that exempting 'not-for-profit' Māori land from reserve contributions does not preclude Council also extending such benefits to non-Maori land. In terms of social equity therefore, this exemption should either be extended either to all not-for-profit development, or to no 'not-for-profit' development. When and if such land is subsequent sold, the recovery of public expenditure for the benefit of that land can then be recovered equitably.

5. CTA notes that 'Development' as defined in section 197 of the LGA 2002 includes any subdivision, building, land use, or work that generates a demand for reserves, network infrastructure, or community infrastructure. We note in Auckland Council's Emergency Budget 2020/2021, the provision for significant disposals of Council-owned property, including, of particular interest to CTA, the disposal of reserve land. We note the likely prospect of a deficit of open-space provision as Auckland continues to grow, and we therefore urge Council to make adequate provision, in part through targeted development contributions for the ongoing purchase of reserve land.
6. Besides the need for open space, CTA consider that the retention of historic heritage (as defined in the RMA 1991) is a collective benefit the cost of which is currently borne solely by private owners, and we consider that development contributions policy should make provision for the collection of contributions towards the retention of historic heritage within the locality of any qualifying development.

Date of submission: 17 October, 2021

Signature:

A handwritten signature in black ink, appearing to read 'Audrey van Ryn', written in a cursive style.

Audrey van Ryn  
Secretary, Civic Trust Auckland