



Annual Plan 2025/2026

Written Feedback

Regional Organisations Volume #2

April 2025



Sub #	Organisation Name	Page Number
8551	Te Kotahi a Tāmaki	1
8553	Auckland Theatre Company	25
8554	Hotel Council Aotearoa	31
8555	Alcohol Healthwatch	41
8556	CCRG	47
8557	Te Kawerau a Maki	53
8559	Te Ākitai Waiohua	62
8560	Property Council New Zealand	73
8562	Drowning Prevention Auckland (DPA)	79



#8551



Annual Plan 2025-2026

Note: this simplified version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed, and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Te Kotahi a Tāmaki

Local Board: Regional Organisation

Your feedback

Question 1: Our overall plan

Our proposed Annual Plan 2025/2026 builds on our Long-term Plan 2024-2034 (LTP).

The annual plan focuses on getting on with strengthening the financial and physical resilience of Auckland, while investing where it is needed most to manage growth. In 2025/2026, that includes prioritising investment in:

- transport
- water
- and fairer funding for local communities

It sets out the proposed way to pay for services and investments, including the 5.8 per cent rates increase for the average value residential property which is in line with the LTP, and additional debt to fund \$4 billion of capital expenditure.

What is your opinion on our proposed annual plan?

Support most

Tell us why

See attached

Summary of Attachment;

Partnership and Collaboration

1. **Effective Collaboration:** Waikato-Tainui emphasizes the importance of effective collaboration with Auckland City Council for sustainable regional development, particularly in decision-making processes related to land use, infrastructure, and environmental management.
2. **Water Supply and Protection:** Highlights the significance of the Waikato River, which supplies over 50% of Auckland's water. Collaboration is essential to uphold Te Ture Whaimana and protect the river from degradation.
3. **Engagement with Mana Whenua:** Acknowledges the Council's efforts to engage with mana whenua and encourages continued development of these relationships, ensuring iwi and marae participation in Council processes.

Environmental Sustainability

1. **Sustainable Practices:** Advocates for integrating sustainable practices into the Annual Plan, including climate change mitigation, biodiversity protection, and eco-friendly infrastructure development.
2. **Kauri Dieback Management:** Welcomes the inclusion of kauri dieback management but seeks clarity on funding and protection mechanisms.
3. **Māori-led Initiatives:** Recommends funding for Māori-led initiatives to safeguard kauri forests using traditional knowledge and practices.

Transport Accessibility for Māori Communities

1. **Equitable Access:** Emphasizes the need for equitable transport access for Māori communities, especially in underserved regions.
2. **Impact on Māori Land:** Expresses concerns about the potential impact of transport infrastructure on Māori land and culturally significant sites, recommending detailed cost-benefit analyses and engagement with iwi and hapuu.

Infrastructure Investment

1. **Water Preservation:** Stresses the importance of considering the impact of infrastructure development on the Waikato River and adhering to obligations under the Memorandum of Understanding and Te Ture Whaimana.
2. **Consultation and Engagement:** Requests engagement and consultation in all stages of major water infrastructure projects to ensure compliance with Te Ture Whaimana.
3. **Environmental Plan Utilization:** Urges the use of the Waikato-Tainui Environmental Plan in infrastructure development to support and recognize iwi rights and interests.

Economic Development

1. **Sustainable Growth:** Advocates for sustainable economic development that respects cultural values, promotes local businesses, and creates meaningful employment opportunities, especially for Māori and underrepresented groups.
2. **Social Procurement Strategy:** Highlights the Social Procurement Strategy developed by Waikato-Tainui, urging collaboration with Auckland City Council to achieve better outcomes for both Māori and non-Māori.

3. Local Economic Engagement: Calls for strong consultative processes to ensure economic development benefits local communities and reduces dependency on regional authorities

Question 2: Destination management and major events

Attracting visitors and securing, promoting and delivering major events are vital to Auckland being a dynamic and exciting city. In our Long-term Plan 2024-2034, we said we would continue to fund cultural festivals and other significant community events. However, without a bed night visitor levy, there will be a \$7 million budget shortfall for funding of major events that are expected to attract visitor expenditure, such as the ASB Classic, Auckland Marathon and Auckland Writers Festival, from the 2025/2026 financial year. We continue to advocate to central government to introduce this levy. A bed night visitor levy of 2.5 per cent to 3 per cent paid by those in short-stay accommodation, would raise around \$27 million each year to fund even more destination management, marketing and major events activities in Auckland.

A bed night visitor levy requires central government legislative change and they have yet to agree to introduce this legislation. We continue to work with central government on this and your views will help inform this work.

Do you support a bed night visitor levy paid by those in short-stay commercial accommodation, to fund destination management, marketing and major events activities?

Support

Tell us why

See attached:

Can support Māori culture and events – lack of detail on benefits.

Secure long-term funding for Māori arts, culture, and major events.

Question 3: Changes to other rates, fees and charges

3A. What do you think of the waste management proposal?

Apply the Refuse Targeted Rate to residential and lifestyle properties in Franklin and Rodney to pay for council's rubbish collection service, replacing the current system of purchasing rubbish bags.

Other

3B. Would you like to comment on this or the other rates, fees and charges proposals?

(Please be clear which proposal you are talking about)

See attached:

Consider a targeted rates relief or exemptions for marae and papakāinga housing. Commit to equitable funding for Māori-led community initiatives. Increase investment in local marae infrastructure through the Local Board Fairer Funding model.

Question 4:

Local board priorities

4A. Which local board(s) would you like to provide feedback on?

Question 5: Other feedback

Do you have any other comments on the Annual Plan 2025/2026?

Do you have any other feedback, including the Tūpuna Maunga Authority Operational Plan 2025/2026 (page 33 of the Consultation document)?

Tell us here

See attached

Summary of Attachment:

1. Memorandum of Understanding: Suggests reviewing the existing Memorandum of Understanding to ensure it aligns with the outcomes of the Annual Plan.

LTP Feedback reporting

Group: #11 Te Kotahi a Tamaki

Feedback from Māori entities

Representative: [REDACTED]

Identify: Mataawaka

Notes from verbal presentation to Annual Budget discussion.

[REDACTED] provided opening mihi.

[REDACTED] Chair of meeting AC

15 Minute time allocation

- **Noted:** Transport retain and expand \$50 fare cap – improve bus and train routes to support Marae
- **Noted:** Secure long-term funding for Māori arts, culture, and major events.
- **Noted:** Increase funding for Māori-led community safety initiatives, including Māori Wardens and marae.
- **Noted:**
- **Noted:**

Overall direction for Annual Budget

Te Kotahi a Tamaki

What is your opinion on our proposed annual plan?	Support most – with conditions Noted Whanau struggling with cost of living - higher rates impact affordability for Māori homeowners. Marae and Māori organisation funding models are inequitable.
Environment - Sustainability	Generally, support – not stated Mataawaka Marae very much involved in environmental activity and sustainability
Do you support Bed night visitor levy?	Support Can support Māori culture and events – lack of detail on benefits. Secure long-term funding for Māori arts, culture, and major events.
Local Board priorities – Fairer Funding	Supported Increased Local Funding – More resources for marae-based initiatives, cultural events, and community projects. We want to feed into this process and work in partnership for the betterment of our marae and Hāpori.

CO Reform	<p>Not Stated</p> <p>Increase Māori representation on CCO boards to uphold Te Tiriti commitments.</p> <p>Māori business struggle to make inroads into economic support from these CCO's.</p> <p>Improve procurement process to create fair opportunities for Māori business.</p>
Māori Outcomes Fund	<p>Strongly Supported</p> <p>Strong investment in Māori led programmes – rangatahi programmes and cultural revitalisation</p>
Rates and Charges – paying for growth	<p>Not Stated concerned</p> <p>Consider a targeted rates relief or exemptions for marae and papakāinga housing. Commit to equitable funding for Māori-led community initiatives. Increase investment in local marae infrastructure through the Local Board Fairer Funding model.</p>
Transport	<p>Support</p> <p>Retain and expand \$50 fare cap – improve bus and train routes to support Marae – prioritize conversations with Marae on transport planning.</p>

What else is important to you?

Transcript – *Not a complete record of meeting.*

Te Kotahi a Tamaki is a Māori collective – manawhenua and mataawaka Marae – 34 Marae – across the region – we whakamana marae me whanau – all Marae flourish through collective support.

Across whole Auckland region – 26 % of Marae are mataawaka – 8% Taurahere kaupapa.

Common themes include sustainability and resilience.

Infrastructure and construction are a huge priority – during covid these marae supported communities when agencies closed down.

Climate change symposium – Marae at forefront of information flows – building a cohort of knowledge holders – whakapapa, hononga (connection).

Public transport – retain and expand \$50 fare cap – improve bus and train routes to support Marae – prioritize conversations with Marae on transport planning.

Bed Tax can support Māori culture and events – lack of detail on benefits.

CCO Reform - Māori governance input limited by current CCOs –

Māori business struggle to make inroads into economic support from these CCO's.

Improve procurement process to create fair opportunities for Māori business.

Economy – cost of living

Whanau struggle with cost of living – funding models for

More investment in marae-based projects

Rangatahi

Better (increase) investment in rangatahi and environmental projects – delivered by Marae.

More equitable access to Libraries etc in vulnerable areas.

Local Board Flexibility - Māori outcomes funding increased this uplift should support Marae and Māori led initiatives in social and marae projects – renovation and infrastructure costs.

Māori Outcomes

Strong investment in Māori led programmes – rangatahi programmes and cultural revitalisation – want to be part of the review to ensure continuity of investment in marae –

Active involvement in elections and marae development.

Presentation and written submission provided.



**RESPONSE TO THE AUCKLAND CITY COUNCIL
ANNUAL PLAN 2025-2026**

28 MARCH 2025

This response is filed for Waikato-Tainui by:

Te Whakakitenga o Waikato Incorporated

PO Box 648

Hamilton 3240

INTRODUCTION

1. This response is made on behalf of Te Whakakitenga o Waikato Incorporated (**Waikato-Tainui**) in relation to the Auckland City Council Annual Plan 2025-2026.
2. Waikato-Tainui acknowledges Auckland Council's investment in infrastructure, transport, and environmental initiatives. However, we have serious concerns regarding the insufficient recognition and protection of waahi tapu, cultural narratives, and the broader impacts of urban development on our people and environment.
3. We urge Auckland Council to engage with Waikato-Tainui early and meaningfully to ensure projects align with our settlements, environmental values, and co-management commitments. The Council must embed Waikato-Tainui's cultural, environmental, and economic priorities into its planning frameworks, ensuring that iwi-led decision-making is upheld in land use, infrastructure development, and environmental sustainability.
4. Our response outlines key recommendations to:
 - Strengthen the protection of waahi tapu and cultural heritage in urban planning and infrastructure projects.
 - Uphold Treaty-based co-governance frameworks and provide Waikato-Tainui with decision-making authority over projects impacting iwi assets.
 - Ensure infrastructure investment does not degrade the Waikato River, while adhering to Te Ture Whaimana.
 - Enhance economic opportunities for Maaori businesses and communities through targeted procurement policies.
5. Given that Auckland sources more than 50% of its water from the Waikato River and that many of our marae and whaanau reside within the city, our relationship with Auckland Council must be built on partnership and mutual respect. We call for a more collaborative and culturally responsive approach to regional development – one that acknowledges and protects our identity, whenua, and future generations.

6. Furthermore, Waikato-Tainui has made significant investments in Auckland, reinforcing our long-term commitment to the region's economic and commercial growth. Our iwi has developed key assets, including the Novotel Auckland Airport and Te Arikinui Pullman Auckland Airport Hotels, which enhance the city's tourism and business infrastructure while creating employment and economic opportunities for our people. As an iwi with a strong commercial focus, we welcome further investment opportunities that align with our values and contribute to sustainable and inclusive development. We encourage Auckland Council to engage with us in meaningful partnership to explore future collaborations in infrastructure, housing, commercial ventures, and environmental sustainability – ensuring a thriving future for both Waikato-Tainui and the wider Auckland community.
7. Waikato-Tainui wishes to be heard and wishes to make an oral submission in support of this written submission.

BACKGROUND TO WAIKATO-TAINUI

8. Te Whakakitenga o Waikato Incorporated (**Waikato-Tainui**) is the governing body for the 33 hapuu and 68 marae of Waikato (see **Appendix A**) and manages the tribal assets for the benefit of over 97,000 registered tribal members. It is also:
 - a) the trustee of the Waikato Raupatu Lands Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato Raupatu Lands Deed of Settlement 1995 and the Waikato Raupatu Claims Settlement Act 1995;
 - b) the trustee of the Waikato Raupatu River Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato-Tainui River Deed of Settlement 2009 and the Waikato Raupatu Claims (Waikato River) Settlement Act 2010;
 - c) the mandated iwi organisation for Waikato-Tainui for the purposes of the Maaori Fisheries Act 2004; and
 - d) the iwi aquaculture organisation for Waikato-Tainui for the purposes of the Maaori Commercial Aquaculture Claims Settlement Act 2004.

9. This response is made on behalf of our 33 hapuu, 68 marae and more than 97,000 iwi members, with 30,600 of these members living within the Auckland Council boundaries.
10. In relation to our 68 marae, it should also be noted that there are a number of Waikato-Tainui Marae within the Auckland Council Boundaries including:
 - Makaurau Marae in Maangere
 - Te Puea Memorial Marae in Maangere
 - Puukaki Marae in Maangere
 - Ngaa Hau e Whaa Marae in Pukekohe
 - Rereteewhioi Marae in Waiuku
 - Taahunakaitoto Marae in Waiuku
 - Whaataapaka Marae in Karaka
 - Umupuia Marae in Clevedon
11. Waikato-Tainui marae are kaitiaki of our environment and regard the holistic integrated management of all elements of the environment (such as flora, fauna, land, air and water) with utmost importance.
12. Waikato-Tainui are tangata whenua and exercise mana whakahaere within our rohe (tribal region). Our tribal rohe is bounded by Taamaki Makaurau (Auckland) in the north and Te Rohe Potae (King Country) in the south and extends from the west coast to the mountain ranges of Hapuakohe and Kaimai in the east. Significant landmarks within the rohe of Waikato include the Waikato and Waipaa Rivers, the sacred mountains of Taupiri, Karioi, Pirongia and Maungatautari, and the West Coast Harbours of Whaaingarua (Raglan), Manukau, Aotea and Kawhia moana, the eastern areas of Tikapa Moana (Firth of Thames), and principally, New Zealand's longest river, Te Awa o Waikato.
13. We acknowledge and affirm the intrinsic relationship of Waikato-Tainui with our natural environment.
14. Waikato-Tainui entered into a Deed of Settlement regarding our Waikato River claim under Te Tiriti o Waitangi in 2008 ("2008 Settlement"). This was followed by the signing of a revised Deed in 2009 and ultimately, enactment of the Waikato-Tainui Raupatu (Waikato River) Settlement Act 2010 ("Settlement Act"). The settlement marked the genesis of the Crown's statutory recognition of Te Mana o te Awa and the establishment of a "co-

management” approach between Waikato-Tainui and the Crown regarding matters relating to the Waikato River. Under the Deed of Settlement, the ‘Waikato River’ is defined to include any lakes and wetlands within a certain marked area. Thus, the review of any wetlands provisions falls under the principles established in the Deed of Settlement.

WAIKATO-TAINUI OUTSTANDING AND REMAINING CLAIMS

15. Waikato-Tainui have several unresolved outstanding (Wai 30) and remaining te Tiriti o Waitangi grievances that are currently being negotiated with the Crown under the Treaty settlement negotiations process. These include (but are not limited to) claims in relation to the West Coast Harbours (Kaawhia, Aotea, Whaaingarua and Manukau) and Taamaki Makaurau. These claims are comprehensive in nature and extend to matters concerning whenua, the takutai moana, the moana itself, social, cultural and economic issues.
16. Wai 30 is held by Te Whakakitenga o Waikato to be negotiated on behalf of all 33 hapuu of Waikato-Tainui. The Wai 30 claim is inclusive of those parts and interests included in the original Wai 30 claim filed in 1987, that were intentionally set aside to be addressed, negotiated and settled separately to the Waikato Raupatu Claims Settlement 1995 and the Waikato-Tainui Raupatu Claims (Waikato River) Settlement 2010. This settlement represents a key part of the Wai 30 claim and is a continuation of these previous settlements.
17. Waikato-Tainui considers that our area of interest for settlement purposes to the moana includes the area of foreshore and seabed in and adjacent to each harbour bounded on the landward side by the line of mean high-water springs and on the seaward side by the outer limits of the Exclusive Economic Zone, including the beds of any rivers, lagoons, lakes and other water bodies that are part of the coastal marine area (within the meaning of the Resource Management Act 1991), as well as:
 - a) the airspace and the water space;
 - b) the subsoil, bedrock, minerals and other materials below the water bodies;
 - c) the marine and estuarine waters (including the waters of any rivers, lagoons, lakes or other water bodies);
 - d) the plants, animals and fish – flora and fauna;
 - e) the physical and metaphysical elements of the areas, waters, natural resources and geographic features;

- f) the land, waters, water bodies (including rivers, lakes, wetlands, swamps, estuaries, streams, tributaries, springs, artesian waterways, and other natural watercourses), geographic features, natural resources, plants, animals, and activities within the catchment of each harbour which directly or indirectly interconnect with or affect the harbour; and
 - g) all physical and biological processes (including sediment movement, waves, tides, currents, and activities) within or affecting the areas, waters, natural resources and geographic features.
18. The claims themselves and the approach to negotiations is underpinned by the principles of mana motuhake, mana whakahaere and te mana o te moana. These principles are reflected in a Takarangi Framework (see **Appendix B**) and aspire to achieve autonomy, decision making rights, and co-governance/co-management rights to ensure the health and wellbeing of the moana.
19. Redress mechanisms in this regard are still being developed and negotiated with the Crown. In absence of settlement protections for these remaining claims, Waikato-Tainui reserves the right to directly engage with the Crown and the Auckland City Council on these matters and secure appropriate and necessary protections. Additionally, Waikato-Tainui seeks that Auckland City Council engages with Waikato-Tainui on any matters that impact or effect anything listed at [12] within our area of interest.

WAIKATO-TAINUI POSITION

20. Waikato-Tainui has a range of rights and interests including, but not limited to, those that arise from the following:
- a) The 1995 Waikato Raupatu Lands Settlement (and the Waikato Raupatu Settlement Act 1995);
 - b) The 2008 Deed of Settlement in relation to the Waikato River and Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010;
 - c) Tikanga and customary law; Common law (including the common law relating to aboriginal title and customary law);
 - d) Waikato-Tainui Accords and Joint Management Agreements; and
 - e) The Treaty of Waitangi and its principles.

21. Waikato-Tainui seeks to ensure that these rights and interests are recognised and protected with any policy development.
22. As part of the River Settlement signing in 2008, Waikato-Tainui also signed the Kiingitanga Accord. A cornerstone of this settlement is that both Waikato-Tainui and the Crown have committed to enter into an era of co-management in planning, policy development and decision making.
23. The intention of our settlement was to create a relationship where the Crown would respect and work with Waikato-Tainui in good faith, as a Treaty partner. As set out in the Kiingitanga Accord, this requires the Crown to engage with Waikato-Tainui at the earliest stage practicable when developing legislation or policies or making any decisions that affect or impact the Waikato River, its waters or management over its waters.
24. As noted above, the Kiingitanga Accord includes the principle of Te Mana o te Awa. The inclusion of this principle acknowledges that the Waikato River has its own mauri and is a single indivisible being. Moreover, it gives effect to the deep relationship between the Waikato River and the people of Waikato-Tainui.
25. This is reinforced through Te Ture Whaimana – The Vision and Strategy for the Waikato River. This is the primary direction-setting document for the Waikato-River and any activities affecting the catchment. It prevails over any inconsistent national policy statements and national planning standards as set out under the River Settlement. Te Ture Whaimana clearly states its objectives relate to:
 - a) The restoration and protection of the health and wellbeing of the Waikato River.
 - b) The recognition that the Waikato River is degraded and should not be required to absorb further degradation as a result of human activities.
 - c) The protection and enhancement of significant sites, fisheries, flora and fauna.
26. Although Waikato Tainui principally supports the annual plan's aim to better support communities, there are several points Waikato-Tainui wishes to raise regarding the Annual Plan 2025-2026.

OVERARCHING COMMENTS

27. Waikato-Tainui is cognisant of this coalition governments intention to utilise resources and to rapidly undertake development and infrastructure projects across the motu. However, the impact of this fast-tracked development will have a significant impact on te Taiao and as a result on the health and wellbeing our whaanau.
28. Waikato-Tainui therefore would like to reiterate the importance of direct and early engagement with and by Auckland City Council to ensure that any projects, policy or legislation proposed do not undermine the integrity and obligations provided for through the Waikato-Tainui Settlements.
29. Additionally, Waikato-Tainui would like to stress the importance of continued co-management with our marae and hapuu to ensure that equal and equitable opportunities and outcomes are achieved by both parties within this plan.
30. Waikato-Tainui acknowledges the significant investment proposed for transport, infrastructure, water quality, and environmental initiatives. However, we have several concerns regarding the potential impacts of these initiatives on iwi assets, resources, and customary rights, which will be addressed as follows.

CULTURAL HERITAGE PRESERVATION AND RECOGNITION

31. The Auckland Council's proposed Annual Plan 2025 – 2026 includes significant infrastructure development initiatives however, Waikato-Tainui has identified several key concerns regarding cultural heritage recognition. These are as follows:

a) Insufficient recognition and protection of waahi tapu,

The plan in its current form lacks clear commitment to protect waahi tapu and significant cultural sites, despite their importance to Waikato-Tainui. Infrastructure projects such as road, rail and housing development expansion may encroach on these sites if adequate consultation and investigation is not undertaken. To mitigate the impact of such development, Waikato-Tainui recommends that:

- i. The council integrates waahi tapu mapping and heritage site identification into assessment processes to protect these sites in all planning frameworks
- ii. Create a co-design landscape that fits the cultural narrative of place.

- iii. Stronger legal protections are developed to prevent unauthorised or unnecessary modifications near known sacred sites.
- iv. Consultation with iwi must be made mandatory before approving projects that could impact waahi tapu.

b) Insufficient recognition and protection of Waikato-Tainui narratives in landscape restoration and urban planning.

While the proposed Annual plan presents a vision for regional development, it lacks strong recognition and integration of cultural narratives that are fundamental to Waikato-Tainui identity and environmental values. Waikato-Tainui whakapapa ties us directly to the land, its moana, waterways and air. Restoring landscapes reconnect our marae and their whaanau with their ancestral whenua reinforcing a sense of belonging and responsibility.

Traditional place names often carry deep historical and ecological meanings that inform sustainable land use. Restoring these names is essential for revitalising the cultural landscape and preserving its original function.

The removal of Waikato via proclamation in 1863 from Taamaki, followed by the raupatu (confiscation) of over 1.2 million acres of Waikato-Tainui land caused severe ecological degradation and the loss of traditional stewardship over our whenua and wai. Restoring these landscapes is also about restoring justice, where returning natural resources to iwi control enables the re-establishment of traditional environmental management systems.

While the Auckland City Council Annual Plan references Maaori heritage and engagement, it does not adequately integrate Waikato-Tainui unique cultural narratives, histories and connection to places. The Auckland Unitary Plan acknowledges Maaori values but lacks specific provisions that ensure cultural narratives are protected and encouraged from urban expansion, road development, and infrastructure projects.

To remedy these omissions, Waikato-Tainui recommends that:

- i. Cultural narratives provided by Waikato-Tainui shape land-use decisions, ensuring that ancestral connections and historical significance, guide development choices.

- ii. Urban planning must integrate co-design and co-governance models to ensure iwi-led decision-making in housing, transport, and environmental projects do not undermine Iwi cultural narratives.

c) Limited Co-Management and Treaty Partnership in Decision-making.

The Kiingitanga Accord and Te Ture Whaimana o te Awa o Waikato (Vision and Strategy for the Waikato River) are foundational agreements that establish a co-governance framework for land and resource management, ensuring that Waikato-Tainui plays a central role in decision-making processes that affect our whenua and wai.

These agreements are not just symbolic; they represent legally binding commitments that uphold our rights, responsibilities, and kaitiakitanga over our ancestral lands and waters.

However, Auckland City Council's planning frameworks and decision-making processes fail to adequately reflect or uphold these Treaty-based commitments. There remains a significant gap in co-governance implementation, and the expectation of Waikato-Tainui positioned as an equal decision-making partner. This lack of meaningful engagement risks undermining the integrity of these agreements and leads to decisions that disregard the cultural, environmental, and historical significance of our whenua and wai.

To rectify this, Auckland City Council must embed a true co-governance approach by:

- I. Ensuring Waikato-Tainui has direct decision-making authority, rather than just a consultative role, over projects impacting our taonga.
- II. Fully integrating Te Ture Whaimana o te Awa o Waikato into all planning and policy frameworks related to land, water, and environmental management.
- III. Strengthening Treaty-based relationships through structured, ongoing engagement that recognises and respects Waikato-Tainui's mana whakahaere (authority) over its ancestral lands and waters.

Without these critical changes, the Council risks perpetuating the historical injustices of land alienation, environmental degradation, and exclusion from

governance structures—contrary to the intent of our Treaty settlements and co-governance agreements.

d) Risk of unregulated development impacting cultural landscapes and narratives.

Fast-tracked urban expansion can disrupt cultural landscape and its narrative. In absence of opportunities to co-design and participate in these developments processes, iwi hapuu and marae narrative becomes a lesser consideration. Waikato-Tainui have expressed concerns that many planned projects do not assess the cumulative impacts of land use changes on Waikato-Tainui cultural values.

To better address cultural needs and to appropriately deal with land that is of significance to Maaori, Waikato-Tainui recommends that:

- i. The Council adopt mana whenua-led cultural impact assessments and develop a co-design framework to utilise in consenting processes.
- ii. New planning guidelines should include environmental restoration projects, and maintenance requirements alongside infrastructure expansion.
- iii. Accident Discovery Protocols must also be strengthened to ensure immediate protection, if archaeological cultural remains are found.

e) Economic and cultural disparities in infrastructure investment

The Auckland City Council Annual Plan prioritises economic growth but fails to provide adequate support for iwi business and cultural heritage projects.

To better support iwi business and cultural heritage projects, Waikato-Tainui recommends that:

- i. Auckland City Council implements procurement policies that allocate a portion of infrastructure contracts to iwi, hapu/marae-led enterprises; and
- ii. The Auckland Economic Strategy includes investment in cultural, educational and tourism initiatives that celebrate Waikato-Tainui heritage.

PARTNERSHIP AND COLLABORATION

32. Effective collaboration between the Auckland City Council and Waikato Tainui is crucial for the sustainable development of the region. Waikato Tainui therefore encourages the

council to actively provide for representation in decision-making processes, particularly those relating to land use, infrastructure development, and environmental management.

33. There are currently nine Waikato affiliated marae that sit within Auckland City Council boundaries. The city sources more than 50% of its water supply from the Waikato awa (river), which is significant when you look at population projections and the water take required. There are also several discharge points which pose risk of further degradation to our awa. Continued collaboration and partnership with Waikato-Tainui will therefore be vital to ensure that Te Ture Whaimana is upheld and the impact of water takes and discharges are minimised or completely avoided to protect Waikato awa for future generations.
34. Waikato Tainui acknowledges the Councils continued efforts to engage with mana whenua through the mana whenua forum and the provision of capacity funding to ensure that iwi and marae can participate in Council processes. Waikato Tainui strongly encourages Auckland City Council to continue to develop and maintain these relationships and to also work closely with Waikato mana whenua in decision-making.
35. Waikato-Tainui have an existing Memorandum of Understanding with Auckland Council. The nature and scope of this arrangement should be reviewed to ensure that any intended outcome of this Annual Plan process is captured within its operational parameters.

ENVIRONMENTAL SUSTAINABILITY

36. The protection and enhancement of our natural environment are paramount to the well-being of current and future generations. Waikato Tainui advocates for the integration of sustainable practices and policies into the annual plan, including initiatives to mitigate climate change, protect biodiversity, and promote eco-friendly infrastructure development. This sentiment is echoed in our Tai Tumu, Tai Pari, Tai Ao Waikato-Tainui Environmental Plan, which we expect Auckland City Council to refer to and consistently utilise when evaluating development proposals.
37. Waikato-Tainui welcomes the inclusion of kauri dieback management in the proposed Annual Plan, as Kauri trees hold significant cultural value to Waikato Tainui. However, Waikato Tainui seeks some clarity around the allocation of funding and mechanisms that may be implored to protect these taonga.

38. Additionally, Waikato Tainui would like to see funding directed towards Maaori-led initiatives to safeguard kauri forests, incorporating traditional knowledge and practices.

TRANSPORT ACCESSIBILITY FOR MAAORI COMMUNITIES

39. The proposed transport network, while benefiting Auckland's growth, must also consider the accessibility needs of Maaori communities, particularly in underserved regions. Waikato Tainui recommends that budgetary provision is made to ensure that Maaori communities have equitable access to transport, especially those that may face geographical or financial barriers.
40. Waikato-Tainui notes the substantial investment in transport infrastructure. However, we would like to express our concerns around the potential impact these developments may have on Maaori land, interests and culturally significant sites. To adequately address the issue, we recommend that a detailed cost-benefit analysis be conducted, to account for cultural and environmental impacts on Maaori land.
41. Furthermore, engagement and consultation with iwi and hapuu will be vital to ensure any potential negative effects can be mitigated or avoided in a way that is culturally appropriate. As Waikato Tainui have maintained mana whakahaere within parts of Taamaki, this engagement and consultation will be essential to honour and provide for any rights and interests, recognised within our Memorandum of Understanding, Settlement Legislation and outstanding claims.

INFRASTRUCTURE INVESTMENT

42. In relation to the preservation of water, infrastructure development in Auckland poses the threat of further degradation to the Waikato River and surrounding environments. Therefore, any proposal for development by the Auckland City Council must give utmost regard to its obligations under our Memorandum of Understanding and the National direction setting document Te Ture Ture Whaimana, to ensure that our tupuna awa does not absorb further degradation.
43. Auckland City Council's annual plan includes major water infrastructure projects such as the Central Interceptor Wastewater Tunnel, City Centre midtown wastewater upgrade, and water quality improvement initiatives. All of which will have an impact on the awa. Waikato-Tainui therefore requests to be engaged and consulted in all stages of these developments

as we would like to ensure that te Ture Whaimana is upheld in planning, decision making and implementation processes.

44. Additionally, the Waikato-Tainui Environmental Plan (Tai Tumu Tai Pari Tai Ao) must be utilised by Auckland City Council and wider community to support and recognise Waikato-Tainui rights and interests in the implementation or development of infrastructure noted in the annual Auckland City Council Plan and the Auckland Unitary Plan.

ECONOMIC DEVELOPMENT

45. Waikato Tainui recognises the importance of economic growth and prosperity for the Auckland region. However, we emphasise the need for sustainable economic development that respects cultural values, promotes local businesses, and creates opportunities for meaningful employment and entrepreneurship, especially for Maaori and other underrepresented groups.
46. Waikato Tainui has developed a Social Procurement Strategy, outlining the needs and aspirations of our Waikato Tainui whaanau. This data was gathered through various engagements on a range of kaupapa relating to te Taiao, housing, economic development, education, health and wellbeing. Within this strategy, Waikato Tainui have developed a range of initiatives that target current whaanau need. Waikato Tainui urges the Auckland City Council to work with iwi, hapuu and Maaori businesses to create a collaborative plan, to inform and achieve better outcomes for both Maaori and non-Maaori residing within the Auckland region.
47. Increasing opportunity within local economies to engage or receive contracts for development will enable more self-sufficient communities, that are less dependent on local and regional authorities in the long term. Therefore, Waikato Tainui requires Auckland City Council to develop strong consultative processes within local communities, to ensure that economic development benefits not only local authorities, but the whaanau living within these development areas.

CONCLUSION

48. In conclusion, Waikato Tainui acknowledges the Auckland City Council's commitment to long-term planning and community engagement. We trust that our submission will be considered thoughtfully in the finalisation of the Annual Plan 2025-2026. We look forward

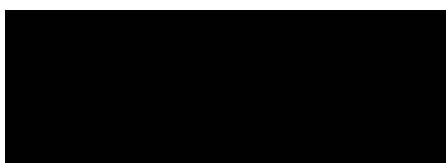
to continued collaboration towards a prosperous, inclusive, and sustainable future for all residents of Auckland.

49. Waikato-Tainui strongly advocate for increased Maaori representation in all decision-making processes related to the Annual Plan 2025/2026. Iwi must be treated as equal partners in shaping the future of Auckland, and we request that Auckland Council allocate funding to ensure meaningful iwi participation in the governance and oversight of key initiatives.

DATED

28 MARCH 2025

TE WHAKAKITENGA O WAIKATO INCORPORATED



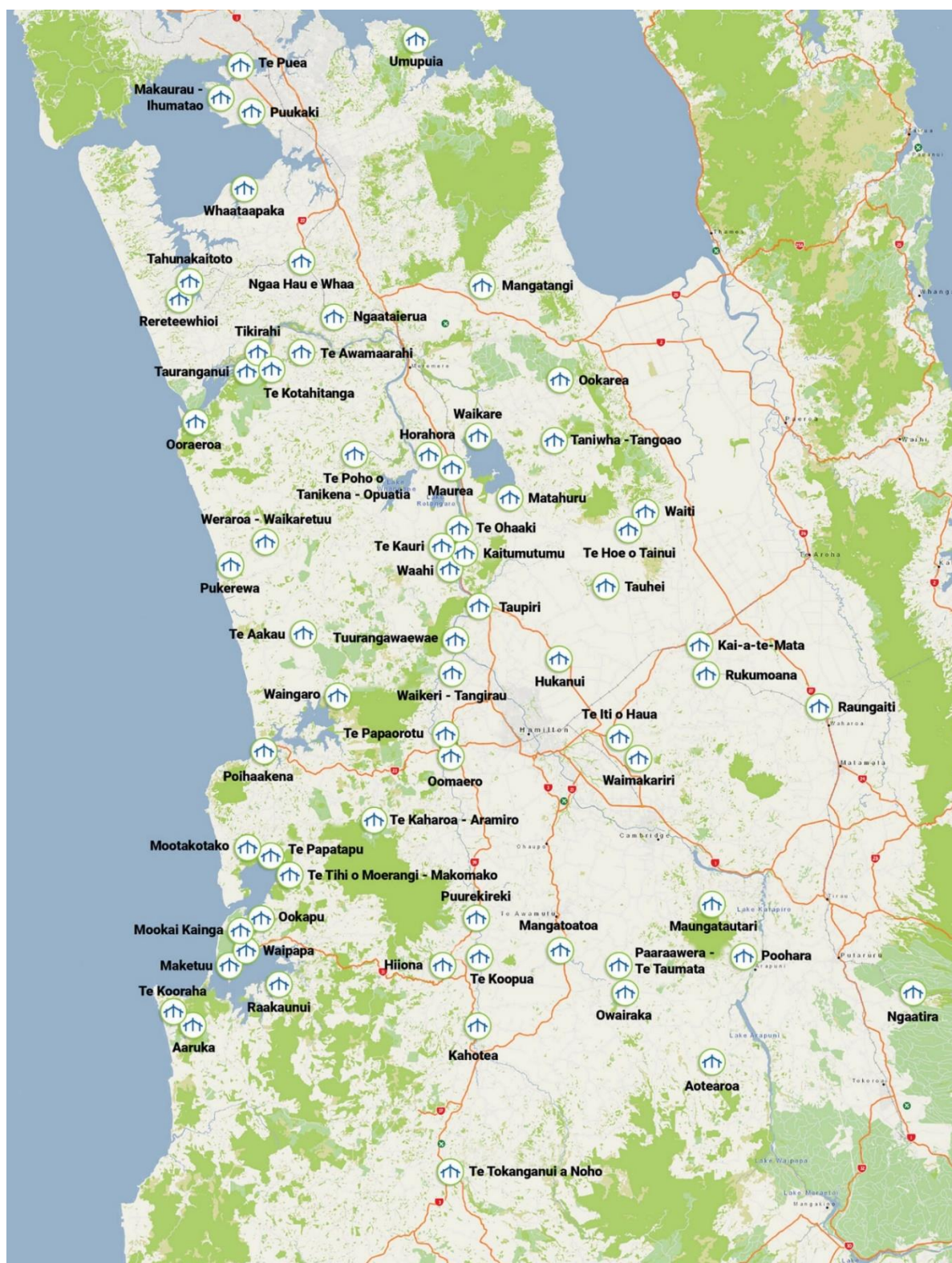


Tumu Whakarae, Waikato-Tainui

Address for Service:

Marae Tukere
General Manager, Oranga, Waikato-Tainui
PO Box 648
Hamilton
Telephone: 07-858 0400

APPENDIX A – Waikato-Tainui 68 Marae



APPENDIX B – Waikato-Tainui Remaining Claims Takarangi Framework



Annual Plan 2025-2026

Note: this simplified version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed, and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Auckland Theatre Company

Local Board: Regional Organisation

Your feedback

Question 1: Our overall plan

Our proposed Annual Plan 2025/2026 builds on our Long-term Plan 2024-2034 (LTP).

The annual plan focuses on getting on with strengthening the financial and physical resilience of Auckland, while investing where it is needed most to manage growth. In 2025/2026, that includes prioritising investment in:

- transport
- water
- and fairer funding for local communities

It sets out the proposed way to pay for services and investments, including the 5.8 per cent rates increase for the average value residential property which is in line with the LTP, and additional debt to fund \$4 billion of capital expenditure.

What is your opinion on our proposed annual plan?

Support most

Tell us why

See attached:

ATC acknowledges the difficult financial context for Auckland Council and recognises Council's focus to get better value for ratepayers of Auckland in delivery of services.

Question 2: Destination management and major events

Attracting visitors and securing, promoting and delivering major events are vital to Auckland being a dynamic and exciting city. In our Long-term Plan 2024-2034, we said we would continue to fund cultural festivals and other significant community events. However, without a bed night visitor levy, there will be a \$7 million budget shortfall for funding of major events that are expected to attract visitor expenditure, such as the ASB Classic, Auckland Marathon and Auckland Writers Festival, from the 2025/2026 financial year. We continue to advocate to central government to introduce this levy. A bed night visitor levy of 2.5 per cent to 3 per cent paid by those in short-stay accommodation, would raise around \$27 million each year to fund even more destination management, marketing and major events activities in Auckland.

A bed night visitor levy requires central government legislative change and they have yet to agree to introduce this legislation. We continue to work with central government on this and your views will help inform this work.

Do you support a bed night visitor levy paid by those in short-stay commercial accommodation, to fund destination management, marketing and major events activities?

Support

Tell us why

See attached:

Summary of Attachment:

Emphasizes the importance of year-round arts activities, not just major events and festivals.

Highlights the interconnected nature of the arts sector and its contribution to Auckland's GDP and employment.

Advocates for investment in year-round cultural infrastructure and promotion.

Decision Sought:

Encourages Auckland Council to consider the long-term economic benefits of investing in year-round arts activities alongside major events.

Question 3: Changes to other rates, fees and charges

3A. What do you think of the waste management proposal?

Apply the Refuse Targeted Rate to residential and lifestyle properties in Franklin and Rodney to pay for council's rubbish collection service, replacing the current system of purchasing rubbish bags.

3B. Would you like to comment on this or the other rates, fees and charges proposals?

(Please be clear which proposal you are talking about)

Question 4:

Local board priorities

4A. Which local board(s) would you like to provide feedback on?

Question 5: Other feedback

Do you have any other comments on the Annual Plan 2025/2026?

Do you have any other feedback, including the Tūpuna Maunga Authority Operational Plan 2025/2026 (page 33 of the Consultation document)?

Tell us here

SUBMISSION ON THE AUCKLAND COUNCIL ANNUAL PLAN 2025-2026

Submitter details:

Name: [REDACTED]

Organisation: Auckland Theatre Company

Address: PO Box 96002
Balmoral, Auckland 1342

Mobile: [REDACTED]

Email: [REDACTED]

Local Boards: Albert Eden / Waitematā & Gulf Islands

Auckland Theatre Company's Interest in the Annual Plan 2025-2026

1. Auckland Theatre Company (ATC) is the region's largest theatre company. Pandemic-affected years aside, each year the Company welcomes more than 80,000 people each year to our suite of programmes including; our season of theatre productions, schools education work, youth theatre company, ASB Waterfront Theatre and community engagement; all of which contribute to Auckland Plan 2050 outcomes Belonging & Participation, Environment & Cultural Heritage, and Opportunity & Prosperity.
2. ATC operates ASB Waterfront Theatre (ASBWT) in Wynyard Quarter for the benefit of the community. ATC uses ASBWT for our own theatre productions for five-to-six months of each year and hosts other Auckland professional arts companies, community groups, corporate events and meetings, and local and international touring productions for the remainder of the time. Utilisation of ASB Waterfront Theatre in 2024 was 71%, above the benchmarked 65% utilisation across similar venues in Australia-New Zealand. The combined annual programme of entertainment and events at ASBWT brings a diversity of opportunities for Aucklanders to access arts, entertainment and events.
3. Year-round, ASBWT is a major driver of the adjacent hospitality economy in Wynyard Quarter with up to 650 people visiting the quarter to attend events each night the theatre is operating.
4. ATC is in receipt of significant public funding. Auckland ratepayers, through the Auckland Regional Amenities Funding Board, contribute 28% of our annual revenue¹. We are one of Creative New Zealand's arts leadership organisations with CNZ contributing 14% of our revenue.
5. ATC is a major employer in the Auckland cultural sector. Outside the screen sector, ATC is the largest employer of actors and creatives. In addition to a staff of 20 FTE's, ATC engages hundreds of casual, contract and fixed-term workers each year.

¹ Funding proportion for 2025 calendar year budget.

6. ATC is a lease holder of an Auckland Council-owned property at the Mount Eden War Memorial Hall.
7. ATC's programmes are integral in providing employment, supporting the development of new artists and playwrights, creating opportunities for communities to share their experience and stories, providing a place for corporate Auckland to gather, drive economic activity and contributing to wellbeing across the region by creating accessible opportunities for social engagement, entertainment and recreation.

Principal Submission in support

8. ATC acknowledges the difficult financial context for Auckland Council and recognises Council's focus to get better value for ratepayers of Auckland in delivery of services.
9. ATC submits in support of most of the Annual Plan.

Submission about destination management and major events

10. ATC is pleased that consideration of the positive impact of arts activity has been included in the Annual Plan given the important role it has in supporting the City's economic growth.
11. ATC supports Auckland Council's proposed visitor levy, but only if the revenue generated from this is in part used to increase investment in arts and cultural activity across the city, not just major events and festivals.
12. ATC notes with concern the focus is on major events and festivals with no recognition that year-round access to arts activity is important for visitors to and residents of the City. The Plan's focus on major events does not recognise that Auckland has a thriving arts sector, including large arts organisations, who continuously attract and service tourists to Tāmaki Makaurau.
13. Whilst we agree that major festivals and events are a wonderful part of our City's entertainment and recreation, the year-long contribution of arts organisations who provide entertainment opportunities for ratepayers, attract visitors to the City, and help support the hospitality economy should also be recognised.
14. The combined arts and culture sector is an industry of interconnected independent companies, contractors, venues and workers who work across the sector to create viable businesses and careers. The sector employs more than 11,500² people in the Auckland region, 40% of whom are self-employed, and contributes \$1.447m to the GDP of Auckland³.
15. It is important to recognise that a healthy year-round arts and culture sector contributes directly to our ability to produce and host one-off major festivals. Without a resident population of highly skilled event technicians, for example, major festivals would have to import the labour workforce increasing cost and reducing overall benefit to the City. A local labour workforce is only possible because there is year-round employment and opportunity.
16. Nationally, it is estimated there will be 12,507 total job openings in the Arts sector between 2024 and 2029. Of these job openings: 39.3% are likely to be due to new

² Infometrics (2024), 2023 Sector Profile Arts in New Zealand, commissioned by Ministry of Arts Culture and Heritage, <https://www.mch.govt.nz/sites/default/files/2024-03/arts-sector-profile-2023.PDF>, pp7-8

³ Ibid, pp14-16

job growth and 60.7% are likely to be due to net replace demand⁴. The sector is forecast to grow, and most of this growth will occur in Auckland. Furthermore, GDP/FTE (productivity) in the arts sector has been stronger than the overall economy⁵, indicating that the sector provides outstanding arts experiences for audiences efficiently.

17. There is year-round demand for quality arts experiences that cross the spectrum of free, subsidised, and paid that are diverse, providing opportunities that are entertaining and experiential. For a city to be truly vibrant, its citizens need to have these opportunities to gather, be entertained, share experiences, and explore ideas and Auckland's cultural sector provide this.
18. Investment by Auckland Council in its year-round cultural infrastructure is as important in investment to attract one-off events.
19. Investment by Auckland Council in promoting the City's year-round cultural infrastructure is as important as investment in promoting one off events and festivals.
20. Finally, ATC submits that through its support of the arts sector in Auckland, via Auckland Council's own activities as well as through Council funded activities, is vital for the wellbeing of Auckland. The arts contribute to a sense of self, nationhood, and understanding of others. In a 2020 research report released by Creative New Zealand, 74% of Aucklanders agreed that the arts should reflect New Zealand's cultural diversity⁶, 61% agree that arts make an important contribution to community resilience and wellbeing⁷, and 60% of Aucklanders support public funding of arts⁸.

Decision Sought

21. ATC encourages Auckland Council to consider the long-term economic benefits for the City that investing in year-round arts activities, as well as one off festivals and major events, has and that it includes the City's arts organisations as one of the beneficiaries of the expected \$27m pa raised from a bed night visitor levy.

⁴ Ibid, p24

⁵ Ibid, p14

⁶ Auckland Report New Zealanders and the Arts 2020: /Attitudes, attendance and participation, p15 (https://creativenz.govt.nz/-/media/Project/Creative-NZ/CreativeNZ/Legacy-Images/ckeditor/attachments/nzarts_auckland_final.pdf)

⁷ Ibid, p21

⁸ Ibid, p18

Annual Plan 2025-2026

Note: this simplified version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed, and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Hotel Council Aotearoa

Local Board: Regional Organisation

Your feedback

Question 1: Our overall plan

Our proposed Annual Plan 2025/2026 builds on our Long-term Plan 2024-2034 (LTP).

The annual plan focuses on getting on with strengthening the financial and physical resilience of Auckland, while investing where it is needed most to manage growth. In 2025/2026, that includes prioritising investment in:

- transport
- water
- and fairer funding for local communities

It sets out the proposed way to pay for services and investments, including the 5.8 per cent rates increase for the average value residential property which is in line with the LTP, and additional debt to fund \$4 billion of capital expenditure.

What is your opinion on our proposed annual plan?

Tell us why

Question 2: Destination management and major events

Attracting visitors and securing, promoting and delivering major events are vital to Auckland being a dynamic and exciting city. In our Long-term Plan 2024-2034, we said we would continue to fund cultural festivals and other significant community events. However, without a bed night visitor levy, there will be a \$7 million budget shortfall for funding of major events that are expected to attract visitor expenditure, such as the ASB Classic, Auckland Marathon and Auckland Writers Festival, from the 2025/2026 financial year. We continue to advocate to central government to introduce this levy. A bed night visitor levy of 2.5 per cent to 3 per cent paid by those in short-stay accommodation, would raise around \$27 million each year to fund even more destination management, marketing and major events activities in Auckland.

A bed night visitor levy requires central government legislative change and they have yet to agree to introduce this legislation. We continue to work with central government on this and your views will help inform this work.

Do you support a bed night visitor levy paid by those in short-stay commercial accommodation, to fund destination management, marketing and major events activities?

Other

Tell us why

See attached:

Summary of Attachment:

Underinvestment in Event Attraction and Destination Marketing:

Auckland Council is not investing enough in these areas, negatively impacting the visitor economy.

The Council has the means to remedy this if it chooses to.

Economic Benefits from Tourism:

Aucklanders should see more direct economic benefits from tourism.

Central government collected \$4.1 billion in tourism GST in FY2024, but not enough was reinvested into the tourism industry.

Collaboration with Industry:

Auckland Council has not effectively partnered with the tourism industry to solve funding issues.

The Council's independent actions have sometimes been at odds with industry needs.

Funding Solutions:

HCA suggests that Auckland Council could re-prioritize \$15-20 million towards event attraction and destination marketing.

A national tourism levy on accommodation stays, if implemented correctly, could be a sustainable solution.

Call for Partnership:

HCA invites Auckland Council to work more closely with the industry to address tourism funding challenges.

Question 3: Changes to other rates, fees and charges

3A. What do you think of the waste management proposal?

Apply the Refuse Targeted Rate to residential and lifestyle properties in Franklin and Rodney to pay for council's rubbish collection service, replacing the current system of purchasing rubbish bags.

3B. Would you like to comment on this or the other rates, fees and charges proposals?

(Please be clear which proposal you are talking about)

Question 4:

Local board priorities

4A. Which local board(s) would you like to provide feedback on?

Question 5: Other feedback

Do you have any other comments on the Annual Plan 2025/2026?

Do you have any other feedback, including the Tūpuna Maunga Authority Operational Plan 2025/2026 (page 33 of the Consultation document)?

Tell us here

28 March 2025

By email only: Have Your Say Annual Plan Consultation
consultation@aklc.govt.nz
akhaveyoursay@aucklandcouncil.govt.nz

Dear Sir/Madam

Have Your Say – Auckland Council Annual Plan 2025-26

We submit on behalf of 57 member hotels

Hotel Council Aotearoa (**HCA**) represents 255 New Zealand hotels, 57 of which are in Auckland. Those 57 hotels in Tamaki Makaurau have a combined 9,415 guest rooms.

Auckland hotels employ approximately 7,080 full-time and part-time staff. In addition, hotels make massive investments in promoting both Auckland and New Zealand. We estimate that Auckland hotels collectively spent \$100-130 million in sales/promotion and agent commissions during 2024 alone, which is substantially more than any tourism marketing carried out by Auckland Council and/or Tataki Auckland Unlimited (**TAU**). Auckland hotels also contribute \$2-3 million in funding towards the voluntary Destination Partnership Programme established by TAU.

Hotels are one of Auckland Council's key constituencies. HCA estimates Auckland's hotels paid \$15.5 million in rates during the 2023 calendar year, but no doubt Auckland Council has access to the actual number.

HCA's policy positions are member-led and ultimately set by a board of elected officers. Many of our member hotels are reluctant to provide individual feedback or make public comment about Auckland Council for fear of backlash. Therefore, when Auckland Council analyses the results of this consultation exercise, we ask that you give appropriate weight to our submission including recognising the full extent of our contribution to what should be a thriving and prosperous Auckland visitor economy.

Hotel sector's feedback, in short

In HCA's submission, these three things are true:

1. **Auckland Council is underinvesting in event attraction and destination marketing**, which is having a negative impact on the Auckland visitor economy, ultimately to the detriment of all Aucklanders. This is something that Auckland Council has the power to quickly remedy, if it has the political will to do so.
2. **Aucklanders should receive more of a direct economic benefit from tourism in Auckland.** This is a challenging and long-standing problem not just in Auckland, but across all of New Zealand. Central government collected \$4.1 billion in tourism GST in FY2024, but not enough of that was reinvested into the tourism industry or shared with the regions where it

was collected. It will take trust-building and collaboration to resolve the tourism funding problem once and for all. Solutions are unlikely to be quick or easy.

3. **Auckland Council has for many years now chosen to work independently of industry on the tourism funding problem** outlined in 2 above. Instead of partnering with industry and supporting a unified message to central government and the public, Auckland Council has instead promoted schemes and ideas *at odds with what industry can support*, at times taking pot-shots at our sector. Unfortunately, these tactics decrease the likelihood of solving the national tourism funding problem in the near term.

Auckland Council should find funds to support event attraction and destination marketing

We have submitted on this issue in three previous Annual Plan consultations. HCA acknowledges that Councillors must always balance competing spending priorities. However, it is *not correct* for Auckland Council to claim it lacks the tools or revenue streams to support event attraction and destination marketing at reasonable levels.

Auckland Council has:

- **More than \$6.67 billion in annual revenue**, an increase of 67% since 2017 when total revenue was \$4.12 billion. Back then, Auckland Council readily found funding to support Auckland Tourism Events & Economic Development (**ATEED**);
- **Significant growth in hotel sector-connected rates income**, given that Auckland hotel rooms supply has increased by almost one-third since 2017;
- **A geographic targeted rate mechanism funding Heart of the City**, which could readily be adjusted to help raise additional funds for CBD event attraction and destination marketing, noting that accommodation providers receive just 10 cents out of every dollar of tourist spending; and
- **Recent liquidation of its investment in Auckland International Airport for \$2.14 billion**, which could have easily supported event attraction and destination marketing for the foreseeable future, without materially compromising Auckland Council's other plans for use of the money raised.

The New Zealand International Convention Centre opens soon in Auckland. Auckland Council has endorsed a revamped Eden Park over the idea of a new CBD stadium. The City Rail Link comes online next year. It seems inconceivable that Auckland Council can champion these sorts of multi-billion dollar tourism infrastructure initiatives while at the same time essentially defunding event attraction and destination marketing. As each of these assets opens for business, it becomes even more important for Auckland Council to set aside funds for activating the visitor economy and attracting high-spending domestic and international tourists to actually use them.

You cannot have lots of expensive hardware and then refuse to buy software. If we want “nice things” like modern CBD public transport, world-class stadia, America’s Cup visits and lucrative international conventions, then Auckland Council simply must take event attraction and destination marketing seriously.

Plenty of other regional authorities across New Zealand and Australia support event attraction and destination marketing properly with the *exact same revenue-raising tools that Auckland Council already has at its disposal*.

For many tourism industry businesses – including for hotels – it feels as if Auckland Council has been “playing chicken” with event attraction and destination marketing spend, perhaps as punishment for industry’s longstanding opposition to the Accommodation Provider Targeted Rate or to build pressure on central government.

It is beyond time for Auckland Council to normalise levels of event attraction and destination funding, taking account of its fortunate position as gateway for 70% of international visitors and New Zealand’s most international city.

With political will around the Council table, HCA is confident that \$15-20 million in funding could be re-prioritised towards event attraction and destination marketing. Unfortunately, however, it may be too late for TAU to build a reasonable calendar of events for winter 2025.

Next steps on solving the longstanding tourism funding problem in New Zealand

HCA has long called for Auckland Council to work in genuine partnership with industry around principles for a fair and reasonable tourism funding solution based on international best-practice. HCA is not against creation of a new tourism levy attaching to accommodation stays, provided such a mechanism is “done once and done right” across New Zealand with comprehensive central government legislation. There are many technical issues to plan for in creating a new levy on all accommodation sector revenues, but these are readily solved for if everyone works together.

Industry is firmly against “quick fix” local bed taxes based on the regional fuel levy or with detail/technical issues pushed down to non-expert council bureaucrats. Old-fashioned American or European bed taxes have come under pressure since COVID with many of them being repurposed away from tourism. In return for potentially supporting a new national levy on accommodation, the hotel sector is entitled to stand firm when calling for a modern and sustainable new mechanism rather than quick fix solutions based on old-fashioned precedents.

HCA and other accommodation sector and tourism industry lobby groups continue to promote a national funding solution with central government Ministers and also opposition parties. Cross-bench collaboration on tourism funding solutions is both desirable and achievable. HCA has good insight into central government’s views with regards to sharing future tourism receipts with local authorities.

Once again, we invite Auckland Council to work more closely with industry on this issue of critical importance to Auckland and all of New Zealand. HCA fully understands Auckland Council’s key concerns and needs around tourism funding. We are *still* not convinced that Auckland Council officials fully understand the needs and concerns of the hotel sector.

Yours sincerely

Hotel Council Aotearoa



Strategic Director



Hotel Council Aotearoa was formed four years ago as part of industries response to the APTR. Today we represent 255 New Zealand Hotels, 57 of which are in Auckland.

Those 57 hotels in Tamaki Makaurau have a combined 9415 guest rooms, make no mistake, hotels, our members are one of your largest constituencies from our annual operating survey, we estimate Auckland hotels and that's hotels only, not motels. Airbnb, or other form of accommodation. Hotels paid 15.5 million in rates during the 2023 calendar year, but you folks will be able to work out the exact number better than I can.

Auckland Hotels employ approximately 7080 full time and part time staff. In addition, hotels make massive investments promoting Auckland. We estimate that Auckland hotels collectively spent \$100 to \$130 million in sales, promotion and agent commissions in 2024.

This private tourism marketing money attracts visitors to Auckland. Those visitors go out and spend widely throughout the city, benefiting a wide range of businesses including bars, restaurants, retailers and rental companies. The evidence is clear that accommodation providers receive less than \$0.10 out of every dollar of tourist spend.

Hotels are outpacing with expansive overseas networks. The loyalty programmes of Hilton, Hyatt, Marriott, IHG and Accor, for example, the largest of those hotel loyalty programmes has 239 million members.

Hotels should be your trusted partners in tourism related policy making and strategy. We have expertise and connections in the area that with all due respect, none of you nor any of your officials possess individually. More important than all that, we want the exact same thing you want. We want more money from tourism being reinvested back into tourism.

Some of you were councillors in 2016 when the APTR was introduced. Phil Goff wanted a bed tax to fund infrastructure such as light rail to the airport. This is a matter of historical fact. The APTR is a work around designed to get the accommodation sector to the bargaining table on bed taxes. Back then, the hotel sector was not sympathetic to the local government tourism funding problem. We are sympathetic now. We accept and agree that local authorities in New Zealand do not get an immediate benefit from tourism spending, we understand that. Unlike in Australia, Central government does not share in tourism GST with the regions.

Local government is left to fund parts of the visitor economy. All of this is understood and accepted by the hotel sector. Hotel Council Aotearoa is championing with central government and other tourism industry stakeholders a national solution to the tourism funding problem.

With a consistent national accommodation levy payable by both international and domestic guests, our scheme would generate 60 million for Auckland for tourism purposes annually. It is a fundamental principle of our scheme that the money must flow back to the region where it is earned without being captured by central government. The hotel sector wants that money to be fully hypothecated back to tourism purposes. It needs to be ring fenced, locked down, circled and red pen and carved in stone.

Let me tell you why:

14 years ago, John Keys gone from 12.5% to 15%. If the extra 2.5% of tourism GST had been reinvested into tourism or shared with local councils, just the tourism GST, then that would have meant a cumulative \$7 billion in additional money into tourism or shared with councils. Last year alone, the 2.5% increment on tourism spending would have been worth \$657 million, or over \$200 million worth to Auckland.

So unfortunately the tourism industry and local government failed to seize the moment 14 years ago, even though we had the Prime Minister who was Minister of Tourism, we failed to seize the moment. So we are here to tell you, let's seize the moment together in 2025. Instead of growing in line with inflation or visitor arrivals, Central governments tourism funding has declined in real terms. Tourism funding has gone down at local government level as well.

But private hotel marketing commission spend, the number I gave you at the start of the speech, the \$100 to 130 million that we spend in Auckland last year, that private marketing money has increased. Do you know why it's increased because the hotels have to advertise to compete with each other.

The hotel sector are not a baddies in this. That is my message to you today. The hotel sector are not the baddies. With a new national tourism funding mechanism, fully baked into new legislation earmarked for investment in tourism, we can change New Zealand for the better. As part of that, Auckland ratepayers and residents will for the very first time, get to share it directly in this world of tourism, receiving an ongoing tourist and dividend of 60 million plus per year, starting with this year and increasing by inflation. Hotel council has for four years been very clear about what needs to happen for hoteliers to support a new national accommodation levy. It must be done once and it must be done right across the entire country.

You are understandably focused on Auckland issues. That's your role. That's what you're elected to do. But the hotel sector is having these same meetings. The hotel sector is fighting random tourism taxes up and down the country. In other parts of New Zealand, the local government wants to put a bed tax on our guests to pay for pipes and roads

that they and central government has under invested in for decades. That's not fair. In the USA and Europe, old-fashioned bed taxes are being unhypotecated, in other words, stolen from tourism and spent on other things. We do not want that to happen in our Aotearoa.

The hotel sector knows that local members bills and quick fix solutions are doomed to fail. Just like the APTR are the mechanisms being proposed are simplistic and rushed when it comes to tourism tax design, and again with the greatest of respect, local councils and individual central government MPs don't really have the knowledge or expertise to create something that is efficient, robust, and modern. There is a very recent example of tourism tax is being done poorly in New Zealand. The international Visitor and Conservation levy.

Mistakes with the IVL are hurting hoteliers and hurting Aucklanders today. 70% of international travellers to New Zealand have arrived in Auckland International Airport and must pay \$100 at the border. Unfortunately, both local government and industry have very little say on how the IPL money is spent.

A lot of backfilling spending that was previously funded by ordinary tourism GST and nothing ever changed. The idea of an APTR mistakes must not be repeated. The hotel sector has made a massive concession by supporting the idea of new accommodation levies, but having made that concession, we want to be part of designing them properly.

Again, Hotel Council Aotearoa is using our profile, our expertise and our contacts to promote including in Wellington with senior government officials. A scheme that would deliver Aucklanders and annual recurring tourism dividend of 60 million and growing for reasons I don't fully understand. Some people see Hotel Council Aotearoa and me personally as preventing progress rather than helping bring it about.

We must start ironing out the details of what does and doesn't work with best practise bed taxes. And let me tell you the answer is not quick fix, enabling legislation and kicking the details down to anonymous council officials with 15 minutes, only for consultation.

Hotel Council Aotearoa and other industry stakeholders want a modern, tech enabled mechanism that provides future certainty rather than leaving tourism businesses exposed to the whims and wishes of whoever is next elected as Mayor of Auckland, Queenstown, Rotorua, Wellington or anywhere else.

You've probably left it too late for winter 2025 now.

But please find some money for event attraction for next year at least. It takes time to build a pipeline of events. Once you do that let's properly work together on the permanent tourism funding solution. If we get this right, I promise you, the seed we

plant today will grow into a gigantic tree for future generations and it will be one of your proudest legacies as a public servant.



#8555



Annual Plan 2025-2026

Note: this simplified version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed, and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Alcohol Healthwatch

Local Board: Regional Organisation

Your feedback

Question 1: Our overall plan

Our proposed Annual Plan 2025/2026 builds on our Long-term Plan 2024-2034 (LTP).

The annual plan focuses on getting on with strengthening the financial and physical resilience of Auckland, while investing where it is needed most to manage growth. In 2025/2026, that includes prioritising investment in:

- transport
- water
- and fairer funding for local communities

It sets out the proposed way to pay for services and investments, including the 5.8 per cent rates increase for the average value residential property which is in line with the LTP, and additional debt to fund \$4 billion of capital expenditure.

What is your opinion on our proposed annual plan?

Tell us why

Question 2: Destination management and major events

Attracting visitors and securing, promoting and delivering major events are vital to Auckland being a dynamic and exciting city. In our Long-term Plan 2024-2034, we said we would continue to fund cultural festivals and other significant community events. However, without a bed night visitor levy, there will be a \$7 million budget shortfall for funding of major events that are expected to attract visitor expenditure, such as the ASB Classic, Auckland Marathon and Auckland Writers Festival, from the 2025/2026 financial year. We continue to advocate to central government to introduce this levy. A bed night visitor levy of 2.5 per cent to 3 per cent paid by those in short-stay accommodation, would raise around \$27 million each year to fund even more destination management, marketing and major events activities in Auckland.

A bed night visitor levy requires central government legislative change and they have yet to agree to introduce this legislation. We continue to work with central government on this and your views will help inform this work.

Do you support a bed night visitor levy paid by those in short-stay commercial accommodation, to fund destination management, marketing and major events activities?

Tell us why

Question 3: Changes to other rates, fees and charges

3A. What do you think of the waste management proposal?

Apply the Refuse Targeted Rate to residential and lifestyle properties in Franklin and Rodney to pay for council's rubbish collection service, replacing the current system of purchasing rubbish bags.

3B. Would you like to comment on this or the other rates, fees and charges proposals?

(Please be clear which proposal you are talking about)

Question 4:

Local board priorities

4A. Which local board(s) would you like to provide feedback on?

Question 5: Other feedback**Do you have any other comments on the Annual Plan 2025/2026?**

Do you have any other feedback, including the Tūpuna Maunga Authority Operational Plan 2025/2026 (page 33 of the Consultation document)?

Tell us here

See attached:

The alcohol licensing regime and fee-setting is part of a package of measures which, when used comprehensively, can create safer environments and significantly minimise rates of hazardous drinking and subsequently alcohol-related harm. This includes the Council's Local Alcohol Policy and the Alcohol Control Bylaw 2014 and similar policies.

A bylaw that sets fees that reflect the costs incurred with liquor licencing is not only a harm reduction strategy, but it also supports community outcomes.



**Submission on the Auckland Council
Draft Annual Plan 2025-2026 (annual budget)
Alcohol Licensing Fees
28 March 2025**

Tēnā koutou

Thank you for the opportunity to provide feedback on the draft Annual Plan 2025-2026. We are submitting specifically on alcohol licensing fees

We would like the opportunity to speak to our submission.

If you have any questions on the comments we have included in our submission, please contact:

[Redacted]

Executive Director

Alcohol Healthwatch

M: [Redacted]

E: [Redacted]

About Alcohol Healthwatch

Alcohol Healthwatch is an independent national charity working to reduce alcohol-related harm and inequities. We provide a range of regional and national health promotion services such as providing evidence-based information and advice on policy and planning matters; supporting community action projects, and coordinating networks to address alcohol-related harm such as the Cross-council Local Alcohol Policy Network.

Specific Comments

1. The alcohol licensing fees listed on the Council's website¹ are those set by the Sale and Supply of Alcohol (Fees) Regulations 2013. However, while full cost recovery was envisaged by the Sale and Supply of Alcohol Act 2012, the nationally-fixed default fees set under the 2013 Regulations have not kept pace with the costs incurred by the Council, and it is anticipated that these fees will not adequately reflect costs till at least 2027.²

2. Without setting realistic fees, the Council (and ratepayers) would be subsidising the costs associated with alcohol licensing. Hence an increasing number of councils have utilised their bylaw-making powers under the Sale and Supply of Alcohol (Fee-setting Bylaws) Order 2013³ and set fees (usually 100% cost recovery) through this process as a licensing authority, and in respect of inspection and enforcement functions.
3. We strongly encourage the Council to also make a bylaw to allocate realistic costs for licensing activities, and recommend that the Council consider opting for 100% cost recovery⁴, increasing fees incrementally until the bylaw is reviewed in five years' time.
4. We further recommend that the Council conduct a comprehensive review of all the costs incurred with licensing, which includes costs associated with administration, monitoring and enforcement to ensure that these are met by the sector.
5. Reviewing fees in a timely manner would, we believe, meet the policy objectives of the licensing fees regime, namely:
 - (a) To recover the total reasonable costs incurred by the Council in administering the alcohol licensing system
 - (b) To ensure that those who create the greatest need for regulatory effort bear the commensurate costs
 - (c) To allow local circumstances to be reflected in the fees paid by operators and income received by the Council
 - (d) To minimise alcohol-related harm, to the extent that this can be achieved through a cost recovery regime.⁵

Summary

6. The alcohol licensing regime and fee-setting is part of a package of measures which, when used comprehensively, can create safer environments and significantly minimise rates of hazardous drinking and subsequently alcohol-related harm. This includes the Council's Local Alcohol Policy and the Alcohol Control Bylaw 2014 and similar policies.
7. A bylaw that sets fees that reflect the costs incurred with liquor licencing is not only a harm reduction strategy, but it also supports community outcomes.

REFERENCES

- 1 Auckland Council. Ngā utu ā tau mo ngā raihana waipiro: Alcohol licence annual fees. <https://www.aucklandcouncil.govt.nz/licences-regulations/business-licences/alcohol-licences-fines/open-business-sells-alcohol/Pages/alcohol-license-annual-fees.aspx>.
- 2 Ministry of Justice. Fee system for alcohol control. <https://www.justice.govt.nz/justice-sector-policy/key-initiatives/key-initiatives-archive/sale-and-supply-of-alcohol/licensing/fee-system-for-alcohol-licensing/>
- 3 Sale and Supply of Alcohol (Fee-setting Bylaws) Order 2013. <https://www.legislation.govt.nz/regulation/public/2013/0453/latest/whole.html>
- 4 For example:
 - Hastings District Council Alcohol Licensing Fees Bylaw 2024. The bylaw has a progressive 100% recovery model with no ratepayer contribution. See: <https://www.hastingsdc.govt.nz/assets/Document-Library/Alcohol-Licensing-Fee-Bylaw/Alcohol-Licensing-Fee-Bylaw.pdf>.
 - Porirua City Council Alcohol Fees Bylaw 2024, Council adopted the Alcohol Fees Bylaw in with the intention of full cost recovery of alcohol licensing costs from 1 October 2026. See: https://storage.googleapis.com/pcc-wagtail-media/documents/Alcohol_Fees_Bylaw_2024.pdf
 - Hutt City Council Draft Alcohol Fees Bylaw 2024. The Council has achieved 93% cost recovery and is proposing 100% cost recovery as an option for the 2024 bylaw. See: <https://haveyoursay.huttcity.govt.nz/alcohol-fees-bylaw-2024>, 10 December 2024 https://huttcity.infocouncil.biz/Open/2024/12/HCC_10122024_AGN_3339_AT.PDF.
 - Hamilton City Council Draft Alcohol Fees Bylaw. Commencing with 95% of costs with an increase annually of 3%. See: <https://haveyoursay.hamilton.govt.nz/alcohol-fees-bylaw-2025>.
 - Kapiti Coast District Council Alcohol Licensing Fees Bylaw 2024. Fees from 1 July 2028-2029 - 90% cost recover over five years, with option to further review the level of cost recovery ahead of the next Annual Plan (for example, lifting recovery to 100%). See: <https://www.kapiticoast.govt.nz/media/amgnzzqb/alcohol-fees-licensing-bylaw-2024.pdf>
 - Tauranga City Council Draft Alcohol Fees Bylaw. Based on 100% cost recovery. See: <https://letstalk.tauranga.govt.nz/Portals/14/data/citywide/alcohol-fees-bylaw/files/draft-alcohol-fees-bylaw-2024.pdf>
 - Waipā District Council Alcohol Fees Bylaw 2024. See: <https://www.waipadc.govt.nz/our-council/bylawsandpolicies/bylaws>
 - Wellington City Council Alcohol Fees Bylaw. Fees 85% user pays. - <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/bylaws/files/alcohol-fees-bylaw-2024.pdf?la=en&hash=E740BA23791C8CA8F55A230467299BE4F33FF9C0>
- 5 Ministry of Justice. Regulatory Impact Statement for the Alcohol Licensing System. 2013. <https://www.regulation.govt.nz/assets/RIS-Documents/ris-justice-frf-nov13.pdf>.



#8556



Annual Plan 2025-2026

Note: this simplified version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed, and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): CCRG

Local Board: Regional Organisation

Your feedback

Question 1: Our overall plan

Our proposed Annual Plan 2025/2026 builds on our Long-term Plan 2024-2034 (LTP).

The annual plan focuses on getting on with strengthening the financial and physical resilience of Auckland, while investing where it is needed most to manage growth. In 2025/2026, that includes prioritising investment in:

- transport
- water
- and fairer funding for local communities

It sets out the proposed way to pay for services and investments, including the 5.8 per cent rates increase for the average value residential property which is in line with the LTP, and additional debt to fund \$4 billion of capital expenditure.

What is your opinion on our proposed annual plan?

Support most

Tell us why

See attached:

Summary of Attachment:

Mayor's Priorities

Support for CCO Reform: Emphasis on Auckland Transport, Watercare, and Eke Panuku.

Specific Advice on Proposed Plan

Auckland Future Fund: Support.

Operating Cost Savings: Support.

Capped Public Transport Pass: Support the proposed \$50 per week.

Waterfront Improvements: Support careful planning.

Fairer Funding for Local Boards: Strong support for more decision-making power.

Water Reform: Support.

CCO Reform: Support with decisions made by Auckland Council.

Reducing Corporate Emissions: Total support.

Council's Role

Regional Governance Leadership: Primary function.

Fixing Auckland Governance: Highest priority.

Council Controlled Organisation Reform

Support for Restructure Proposals: Repeal parts of the Local Government (Auckland Council) Act 2009.

Confidence in Auckland Council: Belief in quality decision-making.

Opposition to Rates Increase for Residential Properties: Suggest increases come from the business sector.

Question 2: Destination management and major events

Attracting visitors and securing, promoting and delivering major events are vital to Auckland being a dynamic and exciting city. In our Long-term Plan 2024-2034, we said we would continue to fund cultural festivals and other significant community events. However, without a bed night visitor levy, there will be a \$7 million budget shortfall for funding of major events that are expected to attract visitor expenditure, such as the ASB Classic, Auckland Marathon and Auckland Writers Festival, from the 2025/2026 financial year. We continue to advocate to central government to introduce this levy. A bed night visitor levy of 2.5 per cent to 3 per cent paid by those in short-stay accommodation, would raise around \$27 million each year to fund even more destination management, marketing and major events activities in Auckland.

A bed night visitor levy requires central government legislative change and they have yet to agree to introduce this legislation. We continue to work with central government on this and your views will help inform this work.

Do you support a bed night visitor levy paid by those in short-stay commercial accommodation, to fund destination management, marketing and major events activities?

Support

Tell us why

See attached:

As noted, funding to support this activity is currently inadequate, and CCRG support the Annual Plan

suggestion of a bed night visitor levy. We note that this proposal to central government has not been

progressed to an implementation stage at this point and that the upcoming year will have a shortfall of some

\$7m.

We suggest that the shortfall be funded for the coming year from Auckland Transports budget. This is

proposed for one year only and based on the assumption that the current structural changes at Auckland

Transport will likely produce a shortfall in the approved work programme and thus an overall under expenditure.

Question 3: Changes to other rates, fees and charges

3A. What do you think of the waste management proposal?

Apply the Refuse Targeted Rate to residential and lifestyle properties in Franklin and Rodney to pay for council's rubbish collection service, replacing the current system of purchasing rubbish bags.

Other

3B. Would you like to comment on this or the other rates, fees and charges proposals?

(Please be clear which proposal you are talking about)

See attached:

CCRG support a review of the current CCTR and propose that there is no differential in the basis of how the

rates are struck between business and residential properties, given that a large number of residential properties in our city centre are a mix of both categories. There may well be an opportunity to strike the rates on a differential percentage of property value between business and residential properties, but we believe the base needs to be the same

Question 4:

Local board priorities

4A. Which local board(s) would you like to provide feedback on?

Question 5: Other feedback

Do you have any other comments on the Annual Plan 2025/2026?

Do you have any other feedback, including the Tūpuna Maunga Authority Operational Plan 2025/2026 (page 33 of the Consultation document)?

Tell us here

See attached:

Planning and Paying for Growth

Focus on Urban Growth: Around existing centres to utilize existing infrastructure.

CCRG Feedback on Auckland Councils 2025/2026 Annual Plan

Many thanks for the opportunity to provide feedback into the 2025/26 Annual Plan.

Mayors Priorities

CCRG support these and particularly the need for CCO reform, especially Auckland Transport, Watercare, Eke Panuku from a perspective of delivering outcomes for Auckland City Centre residents.

Specific Advice Sought on Proposed Plan

<u>Auckland Future Fund:</u>	Support
<u>Operating Cost Savings:</u>	Support
<u>Capped Public Transport Pass:</u>	Support the proposed \$50 per week.
<u>Improvements to our Waterfront:</u>	Support the need for careful planning in this key area of our city centre.
<u>Fairer Funding for Local Boards:</u>	Totally support and would like to see Local Boards picking up much more of the decision making for their particular board area.
<u>Water Reform:</u>	Support
<u>CCO Reform:</u>	Support but with the proviso that these decisions need to be made by Auckland Council not by central government.
<u>Reducing Corporate Emissions:</u>	Totally supported.

Council's role and available levers.

We believe Councils role is primarily regional governance leadership for Auckland.
They will have a range of other roles, as they see fit, but the above needs to be their primary function.

We continue with our stated position that fixing Auckland Governance should be the highest priority for our future. It is not reasonable to compare Auckland with best practise, when our Council is hand tied by a legislative organisational structure that is unfit for purpose.

Council Controlled Organisation Reform

CCRG supports the current restructure proposals for the Auckland Council family and are keen to see Parts 4 and 5 of the Local Government (Auckland Council) Act 2009 repealed.

It is unreasonable to refer to Auckland Transport as a Council Controlled Organisation, and then create legislation that removes all council control, noting that the same applies to Watercare – albeit they have very different purpose to Auckland Transport. Auckland Council is perfectly capable of managing all of the various functions that every Council in New Zealand, both local and regional, has done for decades, and continues to do.

We acknowledge that some will make bad decisions, but people in central government also make bad decisions, and there is no legislation that will prevent this.
CCRG have total confidence that Auckland Council, with the same authority as other Unitary Councils in New Zealand, will make quality decisions in the best interests of Auckland, including Auckland Central residents.

CCRG consider that the above activities will continue to form a major part of what Auckland is about, and particularly our city centre.

As retail changes to on-line shopping, and larger suburban shopping malls provide easy access for shoppers, the city centre will need to move their focus to events and visitor attractions.

Destination Management and Major Events

As noted, funding to support this activity is currently inadequate, and CCRG support the Annual Plan suggestion of a bed night visitor levy. We note that this proposal to central government has not been progressed to an implementation stage at this point and that the upcoming year will have a shortfall of some \$7m.

We suggest that the shortfall be funded for the coming year from Auckland Transport's budget. This is proposed for one year only and based on the assumption that the current structural changes at Auckland Transport will likely produce a shortfall in the approved work programme and thus an overall under expenditure.

CCRG support a review of the current CCTR and propose that there is no differential in the basis of how the rates are struck between business and residential properties, given that a large number of residential properties in our city centre are a mix of both categories. There may well be an opportunity to strike the rates on a differential percentage of property value between business and residential properties, but we believe the base needs to be the same.

Planning and Paying for Growth.

CCRG would strongly support Council focussing urban growth around existing city and provincial centres as this is where the necessary infrastructure already exists.

While infrastructure will need to be upgraded for increased use, the costs are still much cheaper than urban sprawl, thus making living in Auckland Central more affordable as a resident.

Proposed Annual Plan 2025/2026

CCRG generally support the budget allocations but would repeat our earlier suggestion that the shortfall in funding for events etc., needs to be well managed over the next twelve months until such time as a bed night visitor levy can be implemented.

CCRG do not support the suggestion proposed in the Financial Flexibility paragraph below -

In a worst-case scenario, the council might consider a rates increase for the average residential property by 1-2 per cent more than projected in the LTP. Debt levels could be marginally higher but still within the 250 per cent prudential policy limit. Should more significant changes be required, then the council would undertake public consultation before final decisions.

If any rates increases are needed, they must come from the business sector as all of those costs are tax deductible for business, but not for genuine residential properties.

Other Issues for consideration

CCRG suggest that absolute clarity around the Outcomes Council expects is the best way to measure whether a stated strategy is working well.

The key purpose of Auckland Council is to be the decision maker for local government in Auckland and, when we have clear Outcomes, we can measure success or failure – without them we can measure very little.

One good example is the City Centre Master Plan and the City Centre Action Plan, which have clear Outcomes for our city centre. CCRG continues to remind Council entities that we measure their success, or failure, by those Outcomes and the associated delivery targets/KPI's.

Chair CCRG

www.ccr.org.nz

Annual Plan 2025-2026

Note: this simplified version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed, and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Te Kawerau a Maki

Local Board: Regional Organisation

Your feedback

Question 1: Our overall plan

Our proposed Annual Plan 2025/2026 builds on our Long-term Plan 2024-2034 (LTP).

The annual plan focuses on getting on with strengthening the financial and physical resilience of Auckland, while investing where it is needed most to manage growth. In 2025/2026, that includes prioritising investment in:

- transport
- water
- and fairer funding for local communities

It sets out the proposed way to pay for services and investments, including the 5.8 per cent rates increase for the average value residential property which is in line with the LTP, and additional debt to fund \$4 billion of capital expenditure.

What is your opinion on our proposed annual plan?

Support all

Tell us why

See attached

Summary of Attachment:

Support for Māori Outcomes

Investment in Māori Outcomes: Supports continued investment of \$16m into Māori outcomes and other targeted rates increases.

Specific Projects: Emphasizes the importance of projects like Te Henga marae and papakāinga, Waitākere Ranges Heritage Area Deed, Te Onekiritea cultural precinct, and Riverhead forest development.

Question 2: Destination management and major events

Attracting visitors and securing, promoting and delivering major events are vital to Auckland being a dynamic and exciting city. In our Long-term Plan 2024-2034, we said we would continue to fund cultural festivals and other significant community events. However, without a bed night visitor levy, there will be a \$7 million budget shortfall for funding of major events that are expected to attract visitor expenditure, such as the ASB Classic, Auckland Marathon and Auckland Writers Festival, from the 2025/2026 financial year. We continue to advocate to central government to introduce this levy. A bed night visitor levy of 2.5 per cent to 3 per cent paid by those in short-stay accommodation, would raise around \$27 million each year to fund even more destination management, marketing and major events activities in Auckland.

A bed night visitor levy requires central government legislative change and they have yet to agree to introduce this legislation. We continue to work with central government on this and your views will help inform this work.

Do you support a bed night visitor levy paid by those in short-stay commercial accommodation, to fund destination management, marketing and major events activities?

Tell us why

Question 3: Changes to other rates, fees and charges

3A. What do you think of the waste management proposal?

Apply the Refuse Targeted Rate to residential and lifestyle properties in Franklin and Rodney to pay for council's rubbish collection service, replacing the current system of purchasing rubbish bags.

3B. Would you like to comment on this or the other rates, fees and charges proposals?

(Please be clear which proposal you are talking about)

Question 4:

Local board priorities

4A. Which local board(s) would you like to provide feedback on?

Question 5: Other feedback

Do you have any other comments on the Annual Plan 2025/2026?

Do you have any other feedback, including the Tūpuna Maunga Authority Operational Plan 2025/2026 (page 33 of the Consultation document)?

Tell us here

See attached

Partnership and Collaboration

Treaty Partnership: Stresses the importance of partnership under Te Tiriti o Waitangi and other legislative frameworks.

Key Moves for Partnership: Proposes a Memorandum of Understanding (MOU), maintaining baseline capacity funding, and a shared annual work programme.

New Provisions Sought

Te Henga Marae: Seeks \$5.1m for infrastructure development.

Riverhead Forest Plan Change: Requests a dedicated Council officer for planning.

Te Onekiritea Point: Seeks Council support for developing a cultural precinct.

Regulatory Role and Capacity Building: Requests ongoing funding to support regulatory functions and capacity building.

Waitākere Ranges Rangers: Proposes funding for full-time rangers for environmental protection.

Community Officers: Seeks funding for community officer roles in West Auckland and North Shore.

AUCKLAND COUNCIL PROPOSED ANNUAL BUDGET SUBMISSION

2025



TE KAWERAU Ā MAKI

*Karanga mai Tainui waka!
Karanga mai ko Te Kawerau ā Maki!
E ki ana te korero
Ko ngā Rau Pou ā Maki ngā tohu whakahi
Ko Te Wao nui ā Tiriwa te ngahere
Mai Waitākere awa ki Wai ō Pareira
Mai Te Korekore ki Nga Tai ā Rakataura
Na Maki te mana me te rangatiratanga
Tihei mauri ora!*

Tēna koutou,

I write on behalf of Te Kawerau Iwi Tiaki Trust (the iwi development subsidiary of Te Kawerau Iwi Settlement Trust). These entities represent the uri of Te Kawerau ā Maki. I write to Auckland Council in the spirit of partnership.

Te Kawerau ā Maki acknowledge the ongoing challenges faced by Auckland Council including the challenges of climate change, environmental degradation and biodiversity loss, the housing crisis, aging or insufficient infrastructure, population growth, regulatory changes, and the ongoing recovery from the 2023 cyclone and storms. Te Kawerau ā Maki, as the iwi of West Auckland and North Shore, have also felt the acute impacts of these challenges including the lingering impacts of the 2023 cyclone on our rohe and in our communities. Te Kawerau ā Maki is committed to working with the Council to help tackle the challenges. In doing so our role is to advocate for the whenua, advocate for our people, and advocate for our West Auckland and North Shore communities.

The Council's proposed annual plan identifies some key outcome areas:

- Transport (\$1,796m opex, \$1,478m capex)
- Water (\$853m opex, \$1,388m capex)
- Built Environment (\$98m opex, \$128m capex)
- Natural Environment (\$695m opex, \$65m capex)
- Community (\$869m opex, \$357m capex)
- Economic and Cultural Development (\$214m opex, \$85m capex)
- Well-Managed Local Government (\$541m opex, \$485m capex)

We understand that Council can consider a broader range of options to address the budget constraints including reviewing what council invests in and finding new ways to work with central government and other external partners. This could involve looking at the services Council provides to the community and how they are delivered. The proposed budget package for 2025/2026 includes a slight reduction in capex to \$3,986m, and slight increase in opex to \$5,068m, and a rate increase of 5.8%.

We support Council's efforts in seeking to strike a balance while continuing to invest where it is needed most. In general we are supportive of the proposed annual plan, in particular continuing to invest \$16m into Māori outcomes, coordinating and implementing kauri dieback management, and continuing with the targeted rates including increasing 3.5% to the NETR and CATTR funds, increasing the WQTR funds, and increasing 3.3% to the WMTR fund.

Our submission focuses on specific matters of importance to Te Kawerau ā Maki. There are matters specific to our iwi that we need to work with Council on in the spirit of true partnership.

Auckland Council as an agent of the Crown has a partnership with Te Kawerau ā Maki under Te Tiriti o Waitangi, and as legislated under the Te Kawerau ā Maki Claims Settlement Act (2015), the Resource Management Act (1991), the Local Government Act (Auckland) (2009) and as acknowledged in the

Auckland Plan and Auckland Unitary Plan. Treaty Partnership means making decisions together and acting together wherever possible. Under our partnership and our rangatiratanga we have a decision-making role over matters that directly affect our wellbeing and our rights over our lands, waters, customary resources and other taonga. This role needs to be better supported and integrated with Council. Three key moves to achieve this are (1) a clear agreement of how Te Kawerau ā Maki and Council can work together (MOU and or Mana Whakahono ā Rohe), (2) maintaining baseline capacity funding but adjusting for CPI, and (3) a shared annual work programme. These three moves can help us develop a stronger relationship and help ensure that our shared mahi is an efficient and effective use of time and money that helps take both parties forward in meeting our mutual goals including those of the Auckland Plan.

Te Kawerau ā Maki also wants to work together with Council and Government on projects that directly impact our cultural, social, environmental, and economic wellbeing. Four key projects are (1) Te Henga marae and papakāinga, (2) Waitākere Ranges Heritage Area Deed and a new Forum and Plan, (3) Te Onekiritea (Hobsonville) cultural precinct, and (4) Riverhead forest development. These items are all high priority matters in our own strategic and annual plans and directly link to our wellbeing. While some meaningful progress is being made on item 1 and 2, more work is needed.

We seek to 'reset' our relationship with Council, building off our positive collaboration with the Council in the Waitākere Ranges and at the Henderson Civic, and to help Council deliver better value-for-money with the iwi by negotiating a programme of work that achieves mutual and strategic outcomes. The operationalisation of such a work programme through Council Annual and Long-Term Plans is a key step.

We look forward to working together in partnership.

Noho ora mai,



A small black rectangular box redacting the name of the CEO.

CEO

Te Kawerau Iwi Tiaki Trust

Provision	Relief Sought	Budgetary Implication	Legal and Policy Alignment
NEW PROVISION: Te Henga Marae	The Te Henga marae and papakāinga project is known as the Kainga Whakahirahira (settlement of significance) to Te Kawerau ā Maki. It represents the return or renaissance of the iwi within our tribal heartland and is central to the cultural and social wellbeing of Te Kawerau ā Maki. Te Kawerau ā Maki are currently the only mana whenua iwi without a marae and papakāinga in the Auckland region with our last one flooded when Council constructed the dam at Waitākere. The establishment of a Te Kawerau marae at Te Henga was a longstanding legacy commitment of the former Waitākere City Council and goes back to around 1992. Te Kawerau ā Maki will require ongoing support from Council in the establishment of the Te Henga marae as the project is an absolute cultural and social priority for Te Kawerau ā Maki and is subsequently a key Maori wellbeing project for Council as defined in the Auckland Plan. The project includes \$5.1m of infrastructure stage, \$5.3m of marae facilities stage, and \$4.95m of housing stage. We seek strategic investment from Council's Māori outcomes budget for the development of infrastructure for the project. The total cost is \$5.1m for these works. We will then seek other external and internal funding to deliver the remaining project stages.	Māori Outcomes Budget - \$5,100,000	LGA(Auckland) s3(f) Auck Plan Maori Outcomes Direction 1 Auck Plan Maori Outcomes Direction 2 Auck Plan Maori Outcomes Direction 3 Auck Plan Maori Outcomes Direction 4 TKaMCSA Part 2 WRHAA s7(2)(j) AUP RPS B6.2 AUP RPS B6.4 Te Tiriti Article II
NEW PROVISION: Riverhead forest plan change	Te Kawerau ā Maki own in fee simple approximately 3,275 ha of Riverhead Forest. This was received as the main component of commercial redress within the 2015 Treaty Settlement and is the key strategic asset from which to drive the economic wellbeing of the iwi into the future. During the Unitary Plan hearings Te Kawerau ā Maki sought to have a precinct placed over the Riverhead Forest Treaty land to recognise its unique status as commercial redress land inextricably bound to the economic development of the iwi, and to enable Te Kawerau ā Maki to work with Council jointly on a solution that unlocked the potential of the land in a sustainable way. Due to the compressed timeframes of the PAUP process, Council went on the record noting that there was not the time or adequate information at hand to agree to the full scope requested by Te Kawerau ā Maki, but that as with other iwi submissions through the PAUP there would be future opportunity for a Council assisted plan change. Te Kawerau ā Maki see opportunity to work with Auckland Council and the Government to help address the current Auckland Housing Crisis, and potentially also assist with the planting of permanent native trees at a significant scale. Te Kawerau ā Maki have ambitions to provide large scale and strategic master planned community solutions at Riverhead staged over a 100-year timeframe. We request a dedicated Council officer appointee to work with us on the initial plans for this, eventually hopefully leading to a Council-supported plan change.	Nil (relocation of existing FTE capacity, assistance with plan change)	LGA(Auckland) s3(f) Auck Plan Maori Outcomes Direction 1 Auck Plan Maori Outcomes Direction 2 Auck Plan Maori Outcomes Direction 3 TKaMCSA Part 3 RMA Part 2 AUP RPS B6.2.1(3) AUP RPS B6.2.1(4) AUP RPS B6.4.1 Te Tiriti Article II

NEW PROVISION: Te Onekiritea Point (Hobsonville)	Te Kawerau ā Maki owns 0.3 ha of land at Te Onekiritea (Hobsonville Point) as cultural redress land and has an exclusive right of refusal to purchase the surrounding 11ha of the Point through our Treaty Settlement. This is a key piece of our commercial redress opportunity. It is currently administered by Kainga Ora on behalf of the Crown and is surplus land. The ability to purchase the RFR is contingent on whether Council first wishes to purchase the land for open space (in which case the RFR transfers to Council). Council has confirmed it only requires a maximum of 4ha. Te Kawerau have for many years tried to acquire our redress at Te Onekiritea and develop a cultural precinct including the cultural redress land already owned by us in an integrated manner. We seek active support from Council to progress and formalise the matter including through a collaborative masterplan. We seek a formal non-monetary commitment from Council to assist us in resolving the matter, in terms of a lead Council officer.	Nil (relocation of existing FTE capacity)	LGA(Auckland) s3(f) Auck Plan Maori Outcomes Direction 1 Auck Plan Maori Outcomes Direction 2 Auck Plan Maori Outcomes Direction 3 TKaMCSA Part 3 RMA Part 2 AUP RPS B6.2.1(3) AUP RPS B6.2.1(4) AUP RPS B6.4.1
NEW PROVISION: Regulatory Role and Partnership (Capacity Building)	Te Kawerau ā Maki has regulatory functions under the RMA, WRHAA and our Treaty Settlement Act. Our participation and partnership with Council in undertaking these functions is ad-hoc and project-specific, and a significant amount of this work (between 40-60%) is unfunded, with the burden falling directly on the iwi and making capacity building difficult. We note our current level of funding is around 1% of a local board on average (\$18M+). We seek Council ongoing funding to support our genuine participation in the regulatory functions to cover the shortfall, and to help us build our capacity and relationship with Council. The increased funding provides a baseline business case from which we can develop capacity and capability (such as regulatory engagement and coordination). We seek this baseline funding be maintained but adjusted for CPI.	Māori outcomes budget - \$206,740 adjusted for CPI (2.4%) to \$211,701	LGA(Auckland) s3(f) Auck Plan Maori Outcomes Direction 1 Auck Plan Maori Outcomes Direction 3 TKaMCSA s9 WRHAA s7(2)(i) RMA Part 2 NZCPS AUP RPS B6.2 AUP RPS B6.3 AUP RPS B6.5 Te Tiriti Article II Tikanga
NEW PROVISION: Waitākere Ranges Heritage Area Deed and Partnership	The Waitākere Ranges Heritage Area Act (2008) stipulates that a Deed of Recognition can be entered into with Te Kawerau ā Maki in recognition of its tangata whenua status over the area. Te Kawerau ā Maki has identified a desire to progress the Deed in their feedback to the 10-year WRHA review. Te Kawerau interests and rights over the Waitākere Ranges are also enshrined in legislation through the Te Kawerau ā Maki Treaty Settlement. Te Kawerau are currently working closely with Council and DOC since declaring a rāhui over the forested area in 2017. We seek to formalise this relationship through the Deed. The Council governing body resolved in December 2024 to enter into a Deed and to start a public engagement process on key matters within it. The item is included here as a matter of importance to us, and requesting ongoing in-kind support from Council.	Nil (internal staff time and incidental opex costs)	LGA(Auckland) s3(f) Auck Plan Maori Outcomes Direction 1 Auck Plan Maori Outcomes Direction 3 Auck Plan Maori Outcomes Direction 4 TKaMCSA s9 TKaMCSA Part 2 WRHAA s7(2)(j) WRHAA s29 RMA Part 2 NZCPS AUP RPS B6.2 AUP RPS B6.3 AUP RPS B6.5 Te Tiriti Article II Tikanga

NEW PROVISION: Waitākere Ranges Te Kawerau Rangers	Te Kawerau ā Maki heartland is the Waitākere Ranges, and we have stepped up to protect the environment here through the 2017 rāhui and many other projects and actions. This is our duty as kaitiaki, however this comes with an operational burden. We seek Council support in funding five full-time Te Kawerau ā Maki rangers to work alongside our Council and DOC peers in protecting the ngahere and WRHA in the spirit of partnership, and five full-time pest control rangers to focus on partnering with community on delivering on-the-ground pest and weed control. It is likely that some of this budget, particularly pest control contracts, could be re-allocated for this purpose, with most of the funds likely to be found within existing opex.	Nil (likely can be found within existing budgets related to WRHA - \$700,000 p/a)	Auck Plan Maori Outcomes Direction 1 Auck Plan Maori Outcomes Direction 3 TKaMCSA Part 2 WRHAA s7(2)(j) WRHAA s43 RMA Part 2 AUP RPS B6.2 AUP RPS B6.3 AUP RPS B6.5 Te Tiriti Article II Tikanga
NEW PROVISION: Te Kawerau ā Maki and Council Relationship Agreement / Mana Whakahono and Annual Plan	Te Kawerau ā Maki do not have a formal relationship agreement with Auckland Council, despite having drafted one and lodging it as draft in 2017. We seek to integrate this with beginning the formal process of drafting a Mana Whakahono document under the provisions of the RMA. We previously asked to enter into a Mana Whakahono a Rohe on numerous occasions, including within LTP and Annual Plan submissions.	Nil (reallocation of existing FTE capacity)	RMA Sections 58L to 58U LGA(Auckland) s3(f) Auck Plan Maori Outcomes Direction 3 AUP RPS B6.2 TKaMCSA s9 Te Tiriti Article II Tikanga
NEW PROVISION: Te Kōpua Henderson Creative Precinct	Continuing to support the collaborative development of the Te Kōpua Henderson Creative Precinct with Tātaki Unlimited, which is focused on the retention, attraction, and enhancement of creative industries and talent in the Henderson area.	Nil (existing funding secured – this is a continuation)	LGA(Auckland) s3(f) Auck Plan Maori Outcomes Direction 1 Auck Plan Maori Outcomes Direction 3 TKaMCSA s9 AUP RPS B6.2 AUP RPS B6.3 Te Tiriti Article II Tikanga
NEW PROVISION: Te Kawerau ā Maki Community Officer	We seek joint local board funding to create two community officer roles – one in West Auckland and one in North Shore – to help us better connect with the Local Boards and community within our heartlands.	Local Board budgets - \$200,000	LGA(Auckland) s3(f) Auck Plan Maori Outcomes Direction 1 Auck Plan Maori Outcomes Direction 3 TKaMCSA s9 AUP RPS B6.2 AUP RPS B6.3 AUP RPS B6.5 Te Tiriti Article II Tikanga



#8559



Annual Plan 2025-2026

Note: this simplified version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed, and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Te Ākitai Waiohū

Local Board: Regional Organisation

Your feedback

Question 1: Our overall plan

Our proposed Annual Plan 2025/2026 builds on our Long-term Plan 2024-2034 (LTP).

The annual plan focuses on getting on with strengthening the financial and physical resilience of Auckland, while investing where it is needed most to manage growth. In 2025/2026, that includes prioritising investment in:

- transport
- water
- and fairer funding for local communities

It sets out the proposed way to pay for services and investments, including the 5.8 per cent rates increase for the average value residential property which is in line with the LTP, and additional debt to fund \$4 billion of capital expenditure.

What is your opinion on our proposed annual plan?

Other

Tell us why

See attached

Summary of Attachment:

Local Board Funding: Need for transparent, needs-based funding that includes mana whenua priorities.

Question 2: Destination management and major events

Attracting visitors and securing, promoting and delivering major events are vital to Auckland being a dynamic and exciting city. In our Long-term Plan 2024-2034, we said we would continue to fund cultural festivals and other significant community events. However, without a bed night visitor levy, there will be a \$7 million budget shortfall for funding of major events that are expected to attract visitor expenditure, such as the ASB Classic, Auckland Marathon and Auckland Writers Festival, from the 2025/2026 financial year. We continue to advocate to central government to introduce this levy. A bed night visitor levy of 2.5 per cent to 3 per cent paid by those in short-stay accommodation, would raise around \$27 million each year to fund even more destination management, marketing and major events activities in Auckland.

A bed night visitor levy requires central government legislative change and they have yet to agree to introduce this legislation. We continue to work with central government on this and your views will help inform this work.

Do you support a bed night visitor levy paid by those in short-stay commercial accommodation, to fund destination management, marketing and major events activities?

Tell us why

Question 3: Changes to other rates, fees and charges

3A. What do you think of the waste management proposal?

Apply the Refuse Targeted Rate to residential and lifestyle properties in Franklin and Rodney to pay for council's rubbish collection service, replacing the current system of purchasing rubbish bags.

3B. Would you like to comment on this or the other rates, fees and charges proposals?

(Please be clear which proposal you are talking about)

Question 4:

Local board priorities

4A. Which local board(s) would you like to provide feedback on?

Question 5: Other feedback

Do you have any other comments on the Annual Plan 2025/2026?

Do you have any other feedback, including the Tūpuna Maunga Authority Operational Plan 2025/2026 (page 33 of the Consultation document)?

Tell us here

See attached

Summary of Attachment:

Commitment to Equity, Partnership, and Sustainable Investment

Te Tiriti o Waitangi: Auckland Council must uphold its commitment to Te Tiriti, ensuring Māori retain authority over their lands and well-being.

Equity: Decision-making should address historical and systemic disadvantages faced by Māori.

Holistic Approach: Policies should reflect Māori values and aspirations, considering long-term impacts

3.3.1 Prioritizing Māori Needs

Infrastructure projects should focus on the needs of Māori communities, not just economic or commercial interests.

Collaboration with Kāinga Ora and the Ministry of Housing and Urban Development is supported, but partnerships must allow mana whenua to lead housing and infrastructure solutions.

3.3.2 Lessons from Large-Scale Projects

Projects like the City Rail Link (CRL) highlight the importance of including Māori communities in planning from the beginning.

Benefits should extend beyond transport to include improved access, economic opportunities, and housing affordability.

3.3.3 Embedding Māori Perspectives

Future infrastructure projects must embed Māori perspectives.

The impact on Māori communities should be a central factor in decision-making, not an afterthought.

Māori Outcomes Fund (MOF): Review should be mana whenua-led, focusing on long-term investment and governance.

Recommendations

Embed equity in decision-making.

Strengthen mana whenua partnerships.

Ensure Māori priorities are visible in the Annual Plan.

Secure long-term investment in Māori development.

Ensure the MOF review is mana whenua-led.

LTP Feedback reporting

Group: #7 Te Ākitai Waiohū

Feedback from Māori entities

Representative: [REDACTED]

Identify: Mana Whenua

Notes from verbal presentation to Annual Budget discussion.

[REDACTED] provided opening mihi.

[REDACTED]

[REDACTED] Chair of meeting AC

15 Minute time allocation

- **Noted:** Fairer Funding model - Some communities still disadvantaged.
- **Noted:** We seek equity not just equality in council resourcing.
- **Noted:** CCO current relationships to be retained
- **Noted:** Co-governance preference

Overall direction for Annual Budget

Te Ākitai Waiohū

What is your opinion on our proposed annual plan?	Generally Supportive “We seek equity not just equality in council resourcing” “Māori Outcomes and local Board investment in Māori outcomes should be fair”
Environment - Sustainability	Support Noted existing successful projects with Te Ākitai Waiohū
CCO Changes	Not specified Our existing relationships must be maintained and kept strong.
Do you support Bed night visitor levy?	Not mentioned
Local Board priorities – Fairer Funding	Generally supportive with conditions “Based on equitable funding level, based on population, deprivation and land areas.” “Manawhenua input is missing – funding must affect Māori aspirations.” “Some communities still disadvantaged.”
Rates and Charges	Not mentioned
Transport	Not mentioned

What else is important to you?

Disappointing to see such a lack of representation at the table, appreciate those online and those here - (reference to number of councillors in person to address Mana Whenua)

delivered her presentation - e Ākitai Oho Moata.

Image crater hill in Papatoetoe.

We kept this land intact (over many years) Cr Darby knows of our efforts to keep this piece of land in current state.

This is an example of how working with Auckland council can produce results we both wish to have.

Te Ākitai vision is to prepare our people for the future

We seek success in social, cultural, environmental and economic development.

Annual plan resourcing

We need robust resourcing (showed maps of Te Ākitai area of interest).

Guiding principles for Te Ākitai Waiohū are that Māori should retain rangatiratanga over Iwi, hapu and taonga and blend into all decision making.

Iwi need targeted resourcing – any proposed service cuts increase hardship for our people.

Priority is a fair needs-based investment.

Governance and Decision making

Te Ākitai lens is one of cultural identity – Our identity is important, as is economic development, kaitiakitanga – social and environmental wellbeing.

We have been involved in governance and strategies at many different levels in council.

We seek equity not just equality in council resourcing.

Start points and resources

Transparent and fair funding.

Māori Outcomes and local Board investment in Māori outcomes should be fair.

Council should introduce re Co-governance and support building tangible and lasting relationships.

Governance must be inclusive.

Move from consultation to co governance

Annual Budget/ Plan

Your proposed plan – fairer funding for communities. Based on equitable funding level, based on population, deprivation and land areas.

Manawhenua input is missing – funding must affect Māori aspirations.

Some communities still disadvantaged.

Fairer Funding/ Māori Outcomes funding

Proposals for LB areas – Auckland plan approach – Based on fairer funding policy – funding levels differ across local boards not all received support. Does not mean fairness?

Local Board Engagement and funding

Mana Whenua must have a role – In South Auckland Mana Whenua visibility is minimal at Local Board level there must be engagement and get us involved early.

LBs must receive Māori outcomes funding if they have engaged (discussed outcomes) with Māori.

Funding must translate into long term impact.

Māori Outcomes must not be siloed – must be more than symbolic.

CCO Change Proposals

CCO changes – is responsiveness to manawhenua there?

Identities within CCOs must be retained.

Māori Partnerships must remain strong – we want to see how change strengthens our relationships for example regeneration programmes must be protected.

Cr Julie Fairey: Local Board aspects – southern local boards strengthening Māori input into decision making.

Karen Wilson: I am the governor for Te Ākitai Waiohū – I made statement we have little or no contact at the governance level.

Cr Richard Hill: CCO relationships – have you found your relationships different say with council – just seeking the strengths of either.

Karen Wilson: Vastly different – for me its why its in the presentation – I have raised with Mayor – what's working currently hasn't featured in the transition phase – still time for transition phase to involve manawhenua input into what is working or what we believe will not work.

Forums there we have nurtured that have not yet been addressed.

Cr Kerrin Leonie: CCO transition – Anything needs to be highlighted re procurement and contracting – 126 billion in Māori assets – investment in Māori tourism – Economic development we could be doing better.

Karen Wilson: Examples - Eke Panuku – first foray into Kotuitui – housing development – had to have skin in the game – allowed us to input - you can see why awards were won – Papatoetoe development specialist expertise – results that continue to win awards.

Te Ākitai Waiohūa



**Submission on Auckland Council's
Annual Plan 2025/26**

1. Introduction

- 1.1 Te Ākitai Waiohū welcomes the opportunity to submit feedback on Auckland Council's **Annual Plan 2025/26**. As mana whenua of Tāmaki Makaurau, we acknowledge the complex challenges Auckland Council faces in balancing financial constraints, service delivery, and future planning. However, we must ensure that any budgetary decisions prioritise equity, partnership, and sustainable investment in Māori communities.
- 1.2 Our vision, '**Te Ākitai Oho Moata**', speaks to the importance of preparing and uplifting our people for the future. This vision can only be realised when our people have access to appropriate resources, decision-making influence, and investment that enables intergenerational success. Auckland Council must reflect this commitment in its Annual Plan by actively embedding Māori priorities across governance, policy, and funding.
- 1.3 While we acknowledge existing commitments to Māori through mechanisms such as the **Māori Outcomes Fund (MOF)** and targeted funding for marae infrastructure and Māori economic development, we remain concerned about how these commitments will translate into **practical, measurable outcomes**. Auckland Council must move beyond policy rhetoric and ensure **tangible progress** for Māori in areas such as housing, infrastructure, economic development, and decision-making influence.
- 1.4 This submission outlines **our position on key aspects of the Annual Plan**, the areas where further work is required, and **our recommendations to strengthen Māori outcomes and partnerships in Auckland Council processes**.

2. Commitment to Equity, Partnership, and Sustainable Investment

2.1 Te Tiriti o Waitangi and the Need for Equity

- 2.1.1 Auckland Council has publicly committed to upholding Te Tiriti o Waitangi, as articulated in the Auckland Plan 2050. The plan acknowledges that Te Tiriti is an exchange of promises, requiring the Crown to respect rangatiratanga and ensure Māori retain authority over their lands, resources, and well-being.
- 2.1.2 However, to honour this commitment, equity must be a driving force in decision-making. Equity is not about providing everyone with the same level of support but recognising that Māori communities face historical and systemic disadvantages that require targeted resourcing. For Māori in Tāmaki Makaurau, these disparities are evident in housing insecurity, economic marginalisation, barriers to education and employment, and the impacts of urban development on whenua and taonga.
- 2.1.3 It is well documented that Māori communities continue to experience significant disparities in socio-economic outcomes. The He Whenua Taurikura report (2023) highlights that Māori households experience greater financial hardship, lower rates of homeownership, and are more vulnerable to economic downturns. Auckland Council budget decisions that increase rates or reduce essential services will disproportionately impact our people, exacerbating existing inequities.
- 2.1.4 If Auckland Council is to demonstrate true partnership under Te Tiriti, it must ensure mana whenua are actively involved in governance structures and that Māori needs are prioritised in financial decisions. Māori should not simply be an interest group consulted late in the process.

but should have direct decision-making influence at all levels of planning, implementation, and review.

2.2 A Holistic Approach to Decision-Making

- 2.2.1 Te Ākitai Waiohū understands that Auckland Council must balance multiple priorities in its Annual Plan. However, funding and policy must be shaped by a holistic view that reflects Māori values and aspirations.
- 2.2.2 Karl-Henrik Robert (1989) once stated that *"Success is only possible when we manage the whole. Managing pieces in isolation will only create fragmented success."* This aligns with our worldview, which acknowledges that Māori wellbeing cannot be achieved in isolation from cultural identity, environmental kaitiakitanga, economic stability, and social wellbeing.
- 2.2.3 Auckland Council's decision-making must move beyond short-term financial considerations and instead assess long-term Māori impacts, ensuring that all policy and funding allocations contribute to lasting, intergenerational success.

3. Key Issues and Concerns

3.1 Fair and Transparent Funding for Local Communities

- 3.1.1 The proposed shift towards Local Board-led funding models has significant implications for mana whenua. While we acknowledge that local decision-making can enable tailored solutions, it is concerning that mana whenua visibility remains limited in Local Board processes. Without clear structures for Māori engagement, funding may be allocated without properly considering mana whenua priorities or addressing historical inequities.
- 3.1.2 Local Board funding must be transparent, needs-based, and accountable to Māori communities. It is not enough for Council to claim an "equitable" funding model—we need to see clear mechanisms that ensure mana whenua influence over funding decisions and that investments in Māori outcomes are strategically prioritised across all Local Boards.

3.2 The Māori Outcomes Fund (MOF) Review

- 3.2.1 Te Ākitai Waiohū supports the review of the Māori Outcomes Fund (MOF), and believes this process must be mana whenua-led, not just an internal Auckland Council exercise. The effectiveness of the MOF must be measured by outcomes, not just spending levels.
- 3.2.2 Key concerns regarding the MOF include:
 - The need for greater transparency in funding allocation and decision-making processes.
 - Ensuring long-term investment in Māori-led initiatives, rather than one-off projects.
 - Strengthening governance mechanisms that enable mana whenua oversight of Māori funding.
- 3.2.3 If the MOF is to be a meaningful tool for achieving Māori aspirations, Te Ākitai Waiohū believes it must be designed and governed by Māori, for Māori.

3.3 Infrastructure and Housing Development

- 3.3.1 Infrastructure projects must prioritise the needs of Māori communities, rather than just economic or commercial interests. We support collaboration with Kāinga Ora and the Ministry of Housing and Urban Development, but this partnership must extend beyond consultation and allow mana whenua to lead solutions for housing and infrastructure development.
- 3.3.2 Large-scale projects such as the City Rail Link (CRL) offer important lessons. While the CRL provides transport benefits, Māori communities must be included in planning processes from the outset to ensure wider benefits, such as improved access, economic opportunities, and housing affordability.
- 3.3.3 We urge Auckland Council to ensure future infrastructure projects embed Māori perspectives and that the impact on Māori communities is a central factor in decision-making, not an afterthought.

4. Recommendations

- 4.1 To address these concerns, we urge Auckland Council to implement the following recommendations:
 - 4.1.2 Embed equity in all decision-making**, ensuring targeted resourcing for Māori to address historical disadvantages.
 - 4.1.3 Strengthen mana whenua partnerships** by formalising co-governance at Local Board, CCO, and Council levels.
 - 4.1.4 Ensure Māori priorities are visible in the Annual Plan**, with transparent funding allocation and accountability measures.
 - 4.1.5 Secure long-term investment in Māori development**, including housing, infrastructure, and economic opportunities.
 - 4.1.6 Ensure the MOF review is mana whenua-led**, with governance structures that enable Māori oversight of funding decisions.

5. Conclusion

- 5.1 Te Ākitai Waiohū remains committed to a collaborative relationship with Auckland Council and seeks to work constructively towards a fairer and more equitable future for all Māori in Tāmaki Makaurau. However, this requires more than words, it requires action.
- 5.2 Auckland Council must prioritise equity, Māori-led governance, and sustainable investment, ensuring that Māori communities are not left behind in the planning and financial decisions that shape our city's future. We urge Auckland Council to implement these recommendations and to actively work with mana whenua before finalising the Annual Plan.

Annual Plan 2025-2026

Note: this simplified version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed, and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Property Council New Zealand

Local Board: Regional Organisation

Your feedback

Question 1: Our overall plan

Our proposed Annual Plan 2025/2026 builds on our Long-term Plan 2024-2034 (LTP).

The annual plan focuses on getting on with strengthening the financial and physical resilience of Auckland, while investing where it is needed most to manage growth. In 2025/2026, that includes prioritising investment in:

- transport
- water
- and fairer funding for local communities

It sets out the proposed way to pay for services and investments, including the 5.8 per cent rates increase for the average value residential property which is in line with the LTP, and additional debt to fund \$4 billion of capital expenditure.

What is your opinion on our proposed annual plan?

Support most

Tell us why

See attached

Summary of attachment:

Supports the Annual Plan for maintaining consistency with the Long-term Plan 2024-2034

Local Boards:

Support for funding allocation based on population, deprivation levels, and land area.

Encouragement for local boards to promote intensification near key transport nodes.

Question 2: Destination management and major events

Attracting visitors and securing, promoting and delivering major events are vital to Auckland being a dynamic and exciting city. In our Long-term Plan 2024-2034, we said we would continue to fund cultural festivals and other significant community events. However, without a bed night visitor levy, there will be a \$7 million budget shortfall for funding of major events that are expected to attract visitor expenditure, such as the ASB Classic, Auckland Marathon and Auckland Writers Festival, from the 2025/2026 financial year. We continue to advocate to central government to introduce this levy. A bed night visitor levy of 2.5 per cent to 3 per cent paid by those in short-stay accommodation, would raise around \$27 million each year to fund even more destination management, marketing and major events activities in Auckland.

A bed night visitor levy requires central government legislative change and they have yet to agree to introduce this legislation. We continue to work with central government on this and your views will help inform this work.

Do you support a bed night visitor levy paid by those in short-stay commercial accommodation, to fund destination management, marketing and major events activities?

Tell us why

Question 3: Changes to other rates, fees and charges

3A. What do you think of the waste management proposal?

Apply the Refuse Targeted Rate to residential and lifestyle properties in Franklin and Rodney to pay for council's rubbish collection service, replacing the current system of purchasing rubbish bags.

Other

3B. Would you like to comment on this or the other rates, fees and charges proposals?

(Please be clear which proposal you are talking about)

See attached

Summary of attachment:

Support for the proposed residential and business rate increases.

Request for a clear plan to reduce the business differential in future

Question 4:

Local board priorities

4A. Which local board(s) would you like to provide feedback on?

Question 5: Other feedback

Do you have any other comments on the Annual Plan 2025/2026?

Do you have any other feedback, including the Tūpuna Maunga Authority Operational Plan 2025/2026 (page 33 of the Consultation document)?

Tell us here

See attached

Summary of attachment

City Rail Link:


Support for purchasing more trains.

Recommend exploring development opportunities around City Rail Link stations to enhance city vibrancy.

Property Council New Zealand

Submission on Auckland Council's Annual Plan 2025/26

25 March 2025

For more information and further queries, please contact


25 March 2025
Auckland Council Annual Plan Team
Via Email: akhaveyoursay@aucklandcouncil.govt.nz

Submission on Auckland Council's Annual Plan 2025/26

1. Summary

- 1.1. Property Council New Zealand ("Property Council") welcomes the opportunity to submit a response to Auckland Council on their Annual Plan 2025/2026 ("Annual Plan").
- 1.2. The Annual Plan gives direction for the annual budget in Tāmaki Makaurau Auckland. We congratulate Auckland Council's Annual Plan for creating consistency by staying the course of what Auckland Council agreed to do through the Long-term Plan 2024-2034.

2. Recommendations

- 2.1. At a high level, Property Council recommends Auckland Council:
 - Make clear in the Long-term Plan 2026-2036 the timeline for reducing the business differential; and
 - Start exploring ways to collaborate with the development community on mixed-use, retail, hospitality and housing projects around City Rail Link stations to maximise the investment and enhance city vibrancy.

3. Introduction

- 3.1. Property Council is the leading not-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 Annual Plan](#). Comments and recommendations are provided on issues relevant to Property Council's members.

4. Rates

- 4.1. Property Council supports the Annual Plan's average residential rate increase of 5.8 per cent and average business rates increase at 6.8 per cent. This aligns with the proposals within the Long-term Plan and provides Aucklanders with greater certainty and confidence in Auckland

Council's budgets. We support Auckland Council's prudence in ensuring that there is no need to deviate from the projected rates increases within the Long-term Plan.

- 4.2. We're disappointed that the 2024 Annual Plan paused the business differential reduction and kept it at 31 per cent. We would appreciate it if the Long-term Plan 2026-2036 could signal when Auckland Council plans to continue reducing the business differential, as previously promised.
- 4.3. We note that the growth in value of business properties has been lower than the growth for non-business properties. Auckland Council has made increases to the business rates for 2025/2026 to maintain a 31 per cent share of business rates. Property Council supports the principle and would like to see business rates decrease in years where the compatible growth in business is higher than the growth in residential.

5. City Rail Link

- 5.1. We support Auckland Council buying more trains to support the City Rail Link opening in 2026.
- 5.2. We recommend Auckland Council immediately start investigating options to work closer with the development community for development around these sites. We are in a window of opportunity to leverage the City Rail Link by developing mix-used, retail, hospitality and housing opportunities above and around the stations. This will create vibrancy within our city and leverage off the investment that central and local government have made on the City Rail Link.

6. Local boards

- 6.1. We strongly support the reallocation of funding for local boards to be calculated as; population (80 per cent), levels of deprivation (15 per cent), and land area (5 per cent).
- 6.2. We believe having the funding set as 80 per cent population, will encourage local boards and communities to have intensification in areas where it makes sense (i.e. near key transport nodes and other amenities). This will also help provide funding towards local infrastructure such as playgrounds and sports parks to service population needs.
- 6.3. We congratulate Auckland Council aligning with the Government on Going for Housing Growth by encouraging increased population that equates to funding for local boards.

7. Conclusion

- 7.1. Property Council supports the Annual Plan. We encourage Auckland Council to work closely with the development sector to maximise the investment of the City Rail Link and enhance city vibrancy.
- 7.2. For any further enquiries, please do not hesitate to contact [REDACTED] Head of Advocacy, via email: [REDACTED] or cell: [REDACTED]

Yours Sincerely,

[REDACTED]
[REDACTED]

Auckland Committee Chair

Annual Plan 2025-2026

Note: this simplified version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed, and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Drowning Prevention Auckland (DPA)

Local Board: Regional Organisation

Your feedback

Question 1: Our overall plan

Our proposed Annual Plan 2025/2026 builds on our Long-term Plan 2024-2034 (LTP).

The annual plan focuses on getting on with strengthening the financial and physical resilience of Auckland, while investing where it is needed most to manage growth. In 2025/2026, that includes prioritising investment in:

- transport
- water
- and fairer funding for local communities

It sets out the proposed way to pay for services and investments, including the 5.8 per cent rates increase for the average value residential property which is in line with the LTP, and additional debt to fund \$4 billion of capital expenditure.

What is your opinion on our proposed annual plan?

Tell us why

Question 2: Destination management and major events

Attracting visitors and securing, promoting and delivering major events are vital to Auckland being a dynamic and exciting city. In our Long-term Plan 2024-2034, we said we would continue to fund cultural festivals and other significant community events. However, without a bed night visitor levy, there will be a \$7 million budget shortfall for funding of major events that are expected to attract visitor expenditure, such as the ASB Classic, Auckland Marathon and Auckland Writers Festival, from the 2025/2026 financial year. We continue to advocate to central government to introduce this levy. A bed night visitor levy of 2.5 per cent to 3 per cent paid by those in short-stay accommodation, would raise around \$27 million each year to fund even more destination management, marketing and major events activities in Auckland.

A bed night visitor levy requires central government legislative change and they have yet to agree to introduce this legislation. We continue to work with central government on this and your views will help inform this work.

Do you support a bed night visitor levy paid by those in short-stay commercial accommodation, to fund destination management, marketing and major events activities?

Tell us why

Question 3: Changes to other rates, fees and charges

3A. What do you think of the waste management proposal?

Apply the Refuse Targeted Rate to residential and lifestyle properties in Franklin and Rodney to pay for council's rubbish collection service, replacing the current system of purchasing rubbish bags.

3B. Would you like to comment on this or the other rates, fees and charges proposals?

(Please be clear which proposal you are talking about)

Question 4:

Local board priorities

4A. Which local board(s) would you like to provide feedback on?

Question 5: Other feedback**Do you have any other comments on the Annual Plan 2025/2026?**

Do you have any other feedback, including the Tūpuna Maunga Authority Operational Plan 2025/2026 (page 33 of the Consultation document)?

Tell us here

See attached:

As Auckland continues to invest in open spaces and water infrastructure, it is essential that safety is

embedded from the outset. By incorporating drowning prevention measures into the Annual Plan 2025/2026, Auckland Council has an opportunity to lead the way nationally, prioritising the wellbeing of

its people and setting a benchmark for integrated, safety-led design.

We strongly recommend that Council formally consult with Drowning Prevention Auckland and other

expert partners on any initiatives involving access to water. This collaboration will ensure that growing

opportunities for aquatic sport, recreation, and transport do not unintentionally increase the risk of drowning.

28 March 2025

akhaveyoursay@aucklandcouncil.govt.nz

Re: Drowning Prevention Auckland (DPA) submission to the Auckland Council Annual Plan 2025/2026 (annual budget).

Introduction

Drowning Prevention Auckland (DPA) welcomes the opportunity to submit feedback on Auckland Council's Annual Plan 2025/2026. Our mission is to create an Auckland free from drowning by enhancing water competence and fostering safe behaviours in, on, and around water to assist in reducing the 18 people who drown on average every year in Auckland with most (around 85-90%) in open water settings¹.

As Auckland's population grows and climate-related impacts intensify, investment in open spaces and water-related infrastructure must be accompanied by a parallel focus on public safety. Drowning prevention is an essential enabler of equitable access, wellbeing, and safe participation across all communities.

We commend Auckland Council on the revitalisation of the waterfront, including the new Karanga Plaza Harbour Pool. DPA's recent collaboration with Eke Panuku regarding this facility demonstrates the positive outcomes of early safety integration. We provided consultancy on risk identification, PRE installation, and community education resulting in a safer and more successful public amenity.

While we commend the Council's commitment to water infrastructure projects and the advancement of the Making Space for Water programme, we note a significant omission: the integration of water safety and drowning prevention measures. As Auckland continues to develop its aquatic environments, it is imperative that safety considerations are embedded within these initiatives to protect all Aucklanders.

Key Submission Points

a. Integration of Water Safety into Infrastructure Projects

Notable projects in the Annual Plan 2025/2026 include the Ōpaheke Sports Park development, Te Kori Scott Park, Te Whau Pathway, West Wave Aquatic Centre, land acquisitions for neighbourhood parks

¹ Water Safety New Zealand. (2025). Drowning Prevention Report 2024. <https://www.watersafetynz.org/2024-national-drowning-prevention-report>

(including Franklin and Michaels Avenue Reserve), and numerous local board initiatives across 2025/2026.

While these projects aim to improve water infrastructure and access to recreational spaces, increased proximity to water also introduces greater drowning risk. DPA urges Auckland Council to ensure that water safety is not an afterthought, but a foundational component of infrastructure planning.

We recommend:

- **Comprehensive Hazard Assessments:** Conduct thorough water safety hazard assessments during the planning stages of all water-related infrastructure projects.
- **Safety Infrastructure:** Allocate budget for installing appropriate signage, public rescue equipment (PRE), and barriers where necessary and appropriate to mitigate risks.
- **Community Education Programmes:** Fund initiatives that educate the public on water safety, particularly in areas undergoing significant development.

b. Prioritisation of Safety in Community Spaces

i) Planning and Environmental Design

We note Auckland Council's intent to boost community safety with initiatives such as safety hubs in the city centre. We advocate for the integration of water safety into urban design and recommend that Auckland Council apply Drowning Prevention for Environmental Design across its planning activities. Please see attached document prepared by AECOM Consulting Services that identifies inadequacies in the current approach to environmental design around water bodies in New Zealand. Other international jurisdictions have adopted similar policies such as the Places to Swim initiative in New South Wales², and Local Authority Guide to Managing Water Safety (Wales) in the United Kingdom³

ii) Coronial Inquiries into Drowning Incidents and Environmental Design Recommendations

Three recent coronial inquiries have highlighted environmental design as a contributing factor in separate drowning incidents. The key design issues identified include access, inadequate signage, lack of personal rescue equipment (PRE), and competing design priorities in public spaces. The recommendations underscore local councils' responsibility to engage more effectively and integrate drowning prevention measures into environmental planning, particularly in high-risk areas.

1. North Piha Beach Inquiry (CSU-2023-AUK-000105 & CSU-2023-AUK-000106)⁴.

The coroner found that the placement of public toilets influenced beach usage patterns and contributed to safety risks. The recommendations focus on improved signage, better consultation between councils and water safety organisations, and proactive safety planning. The report emphasises the need for preventative rather than reactive measures, highlighting opportunities to apply these lessons to other high-risk locations.

² NSW Department of Planning, Housing and Infrastructure, (2024). Places to Swim. A best practice guide to get in, on, and around water in NSW. <https://www.planning.nsw.gov.au/sites/default/files/2024-07/places-to-swim-guideline.pdf>

³ [Local Authority Approaches to Managing Water Safety - Wales by RoSPA - Flipsnack](#)

⁴ Mills, A.J (2024). An inquiry into the deaths of Saurin Nayankumar PATEL and Anshul Pareshbhai SHAH (CSU-2023-AUK-000105 & CSU-2023-AUK-000106). New Zealand Coroners Court.

2. Moturiki Island Inquiry (CSU-2022-ROT-000500)⁵.

Similar to the North Piha Beach inquiry, inadequate signage was identified as a key issue. The coroner directed councils to proactively assess and mitigate risks in environments near open water. The report also recommended a coordinated national approach to water safety improvements.

3. Wellington Waterfront Inquiry (CSU-2021-WGN-000267)⁶.

The coroner identified multiple drowning incidents at the Wellington waterfront, particularly involving intoxicated individuals at night. Recommendations focus on urgent infrastructure improvements, enhanced public reporting mechanisms, and a more structured investigative process for water-related incidents. Additionally, the report highlights the need for clearer regulatory guidance on public space safety at a national level.

iii) Overall Implications for Environmental Design

These coronial findings underscore the critical role of environmental design in drowning prevention. Councils are encouraged to integrate safety measures into urban planning, proactively engage with water safety organisations, and implement clear policies to address hazards in aquatic environments. The reports collectively advocate for a national approach to water safety, with lessons from these inquiries informing best practices across all New Zealand jurisdictions.

iv) West Wave Pool and Leisure Centre

This Auckland Council facility provides tamariki and rangatahi with a safe environment to build confidence in simulated open-water conditions in a controlled environment before visiting dynamic beaches or other open-water environments. Its proposed upgrades are welcomed, and also represent an opportunity for Council to lead by example in aquatic safety:

- Facility Upgrades: Ensure that renovations and new constructions of aquatic facilities incorporate the latest water safety technologies and design principles.
- Staff Training: Allocate funds for ongoing training of facility staff in water rescue and emergency response as has been arranged with DPA this year.
- Public Awareness Campaigns: Develop and support campaigns that promote water safety awareness among facility users and the broader community.

Conclusion

As Auckland continues to invest in open spaces and water infrastructure, it is essential that safety is embedded from the outset. By incorporating drowning prevention measures into the Annual Plan 2025/2026, Auckland Council has an opportunity to lead the way nationally, prioritising the wellbeing of its people and setting a benchmark for integrated, safety-led design.

We strongly recommend that Council formally consult with Drowning Prevention Auckland and other expert partners on any initiatives involving access to water. This collaboration will ensure that growing opportunities for aquatic sport, recreation, and transport do not unintentionally increase the risk of drowning.

Our aspiration is simple: that all Aucklanders can safely enjoy the diverse and vibrant waterways our region has to offer.

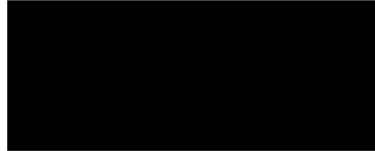
⁵ Telford, I.A (2023). An inquiry into the death of Reon Graeme Wikeepa (CSU-2022-ROT-000500). New Zealand Coroners Court.

⁶ Greig, K.H (2025). An inquiry into the death of Sandy CALKIN (CSU-2021-WGN-000267). New Zealand Coroners Court.

We thank the Council for the opportunity to provide input into this vital plan.



Chief Executive



Research and Impact Manager

Gap Analysis

Environmental Design and Drowning Prevention

21-Mar-2025

Gap Analysis

Environmental Design and Drowning Prevention

Client: Drowning Prevention Aotearoa

Co No.: N/A

Prepared by

AECOM Consulting Services (NZ) Ltd

8 Mahuhu Crescent, Tāmaki Makaurau|Auckland 1010, PO Box 4241 Shortland St, Tāmaki Makaurau|Auckland 1140, New Zealand
T +64 0800 003 903 www.aecom.com

21-Mar-2025

Job No.: 60747722

AECOM in Australia and New Zealand is certified to ISO9001, ISO14001 and ISO45001.

© AECOM Consulting Services (NZ) Limited. All rights reserved.

No use of the contents, concepts, designs, drawings, specifications, plans etc. included in this report is permitted unless and until they are the subject of a written contract between AECOM Consulting Services (NZ) Limited (AECOM) and the addressee of this report. AECOM accepts no liability of any kind for any unauthorised use of the contents of this report and AECOM reserves the right to seek compensation for any such unauthorised use.

Document Delivery

AECOM Consulting Services (NZ) Limited (AECOM) provides this document in either printed format, electronic format or both. AECOM considers the printed version to be binding. The electronic format is provided for the client's convenience and AECOM requests that the client ensures the integrity of this electronic information is maintained. Storage of this electronic information should at a minimum comply with the requirements of the Electronic Transactions Act 2002.© AECOM Consulting Services (NZ) Limited. All rights reserved.

No use of the contents, concepts, designs, drawings, specifications, plans etc. included in this report is permitted unless and until they are the subject of a written contract between AECOM Consulting Services (NZ) Limited (AECOM) and the addressee of this report. AECOM accepts no liability of any kind for any unauthorised use of the contents of this report and AECOM reserves the right to seek compensation for any such unauthorised use.

Document Delivery

AECOM Consulting Services (NZ) Limited (AECOM) provides this document in either printed format, electronic format or both. AECOM considers the printed version to be binding. The electronic format is provided for the client's convenience and AECOM requests that the client ensures the integrity of this electronic information is maintained. Storage of this electronic information should at a minimum comply with the requirements of the Electronic Transactions Act 2002.

Quality Information

Document Gap Analysis
 Ref 60747722
https://aecomaus-my.sharepoint.com/personal/simon_titter_aecom_com/documents/projects_bids/projects/auckland/dpa/dpa_gap_analysis_final_210325_tc.docx
 Date 21-Mar-2025
 Originator [REDACTED]
 Checker/s [REDACTED]
 Verifier/s [REDACTED]

Revision History

Rev	Revision Date	Details	Approved	
			Name/Position	Signature
A	10/03/2025	Draft for client review	[REDACTED]	
B	19/03/2025	Final Draft Report	[REDACTED]	
C	21/03/2025	Final For Issue	[REDACTED]	[REDACTED]

Disclaimer

The report has been commissioned by Drowning Prevention Aotearoa (DPA) and is a collaborative piece of work between DPA and AECOM New Zealand Limited.

Drowning Prevention Aotearoa have contributed to sections throughout this report as their organisation is best placed to provide detailed commentary and information on water safety and drowning incidents in New Zealand

Table of Contents

Acronyms and definitions	i
Executive Summary	ii
1.0 Purpose and Objectives	1
1.1 Purpose	1
1.2 Objectives	1
2.0 Issue	2
2.1 Coroner recommendations - Preventable drownings and water-based injuries due to poor locations of access infrastructure and parking and public space design	2
2.1.1 Inquiry Case Numbers: CSU-2023-AUK-000105 & CSU-2023-AUK-000106 - An inquiry into two fatalities at North Piha Beach	2
2.1.2 Inquiry Case Number: CSU-2022-ROT-000500, 13 May 2023 An inquiry into the death at Moturiki Island, Mount Maunganui	5
2.1.3 Inquiry Case Number: CSU-2021-WGN-000267, 11 March 2025, An inquiry into the death of a man at Wellington Waterfront, Wellington.	8
2.2 Drowning Black Spots in New Zealand	13
2.2.1 Time Frame of Data	13
2.2.2 Urban and Rural Classification	13
2.2.3 New Zealand's Most Dangerous Drowning Black Spots	13
3.0 Worldwide Drowning Prevention Frameworks	15
3.1 The World Health Organisation (WHO)	15
3.2 The International Life Saving Federation (ILS)	16
4.0 Overseas Examples of Drowning Prevention Strategy	17
4.1 United Kingdom	17
4.1.1 National Water Safety Forum (NWSF)	17
4.1.2 The Local Government Association (LGA)	18
4.2 Australia	19
4.2.1 Australian Water Safety Council (AWSC)	19
4.2.2 NSW Department of Planning, Industry and Environment	20
5.0 Gap Analysis - Current NZ Legislative Processes	20
5.1 Resource Management Act 1991 (RMA)	20
5.2 The Building Act	21
5.3 The Reserves Act 1977	21
5.4 Local Government Act	22
5.5 Council Bylaws	24
5.6 Restricted Areas	25
5.7 Injury and Crime Prevention through Environmental Design	25
5.7.1 Relevance to Drowning Prevention	26
6.0 Recommendations	26
Conclusion	29

Acronyms and definitions

AECOM	AECOM NZ Limited
ATV	All-terrain Vehicle
AWSC	Australian Water Safety Council
BA 2004	The Building Act 2004
CPTED	Crime Prevention Through Environmental Design
DoC	Department of Conservation
DPA	Drowning Prevention Aotearoa
DPTED	Drowning Prevention Through Environmental Design
ILS	International Life Saving Federation
IPTED	Injury Prevention Through Environmental Design
IRB	Inflatable Rescue Boat
LGA	The Local Government Act 2002
LGACA	Local Government (Auckland Council) Act 2009
MBIE	Ministry of Business, Innovation and Employment
NSW	New South Wales
NWSF	National Water Safety Forum (United Kingdom)
PRE	Public Rescue Equipment
Reserves Act	The Reserves Act 1977
RMA	The Resource Management Act 1991
RWC	Rescue Watercraft
SLSNZ	Surf Life Saving New Zealand
TCC	Tauranga City Council
UK	United Kingdom
WCC	Wellington City Council
WHO	World Health Organisation

Executive Summary

This report has identified inadequacies in the current approach to environmental design around water bodies in New Zealand, which may contribute to the risk of preventable drownings. Traditionally, drowning prevention measures are aimed at water safety, often focussing on reactive responses rather than preventative strategies embedded in environmental design. This report also identifies ten national high-fatality locations across New Zealand, known as “drowning black spots”.

The recommendations of three coronial inquiries (listed below) emphasise that environmental design was a contributing factor in separate drowning incidents. Key design issues noted included access, inadequate signage, Personal Rescue Equipment (PRE), design elements/features, as well as the presence of competing design outcomes for spaces. The recommendations outline the Council’s responsibility for improved engagement and consideration of drowning prevention measures in terms of environmental design, particularly in high-risk areas.

1. Inquiry Case Numbers: CSU-2023-AUK-000105 & CSU-2023-AUK-000106, 23 October 2024
An inquiry into the deaths of two men at North Piha Beach, Auckland.... ; and
2. Inquiry Case Number: CSU-2022-ROT-000500, 13 May 2023, An inquiry into the death of a man at Moturiki Island, Mount Maunganui.
3. Inquiry Case Number: CSU-2021-WGN-000267, 11 March 2025, An inquiry into the death of a man at Wellington Waterfront, Wellington.

Comparative examples of frameworks from the United Kingdom and Australia demonstrate that it is possible to develop a comprehensive framework for drowning prevention through thoughtful and strategic environmental design. However, there is currently no such framework in New Zealand, with this report noting this as a gap in New Zealand’s drowning prevention approach. The report identifies a opportunity to develop a standalone Drowning Prevention Through Environmental Design (DPTED) framework to specifically address this gap in drowning prevention policy.

Below is a preliminary recommendation for a Drowning Prevention Through Environmental Design (DPTED) framework. Similar to the established, and well adopted, Crime Prevention Through Environmental Design (CPTED) framework, the drowning prevention framework should have relevant principles (listed below) that will contribute to reducing in drowning in New Zealand.

- a. Natural Surveillance
- b. Access management
- c. Risk evaluation
- d. Stakeholder engagement
- e. Community Education

Further, and as noted in the most recent coronial inquiry, there is a gap in New Zealand’s regulations and legal framework for water safety, with the policy in New Zealand surrounding water safety and environmental design currently fragmented and not explicitly linked. This gap in policy means that opportunities for preventative measures in environmental planning are not being fully utilised. By addressing this gap, New Zealand could benefit from a more cohesive approach to drowning prevention, ensuring that future development around water bodies incorporate design principles that minimise drowning risks. Developing such a framework would not only align with international best practices but also provide proactive safety measures before incidents occur, in some instances preventing them from occurring in the first place or reduce the harm caused by these.

Local Boards in Auckland are specifically empowered to make recommendations regarding bylaws and can directly create bylaws for local activities under certain conditions, depending on the subject matter involved. This report recommends that Drowning Prevention Aotearoa use their relationship with Local Boards across New Zealand to advise Councils that there is a requirement to update bylaws to relate open spaces or beaches to include principles included in a drowning prevention framework (above).

1.0 Purpose and Objectives

1.1 Purpose

This Gap Analysis was prepared by AECOM NZ Limited (AECOM) for Drowning Prevention Aotearoa (DPA) to identify the gap between the current environmental design and outcomes that incorporate more effective drowning prevention measures. The purpose of this report is to highlight current issues with environmental design around open water bodies, review relevant literature to assess whether established preventative frameworks for environmental design exist, examine current policies to identify opportunities for integrating drowning minimisation strategies, and understand the key stakeholders involved as well as their roles/responsibilities.

It is understood that DPA intends to use this Gap Analysis to gain sector support and obtain funding to undertake later stages of the project, including potentially a Business Case which will incorporate a Cost Benefit Analysis with a goal, if viable, to develop a standalone Drowning Prevention Through Environmental Design framework to benefit industry professionals and administering bodies on best practice.

1.2 Objectives

The objectives of this report are to:

- a. Identify the current environmental design issues resulting in preventable drownings in New Zealand.
- b. Undertake a literature review of relevant frameworks and examples of best practice from overseas; and
- c. Examine the current policy and legislative processes in New Zealand to identify opportunities for integrating drowning minimisation strategies and understand the key stakeholders.

With a better understanding of the above, DPA will be in a stronger position to develop a standalone drowning prevention environmental design framework that provides recommendations and strategies to address the current policy and regulatory gaps, and enhance environmental design and risk management strategies to reduce preventable drownings.

2.0 Issue

2.1 Coroner recommendations - Preventable drownings and water-based injuries due to poor locations of access infrastructure and parking and public space design

Three recent coronial recommendations emphasise that environmental design was a contributing factor in separate drowning incidents. Key design issues include access, inadequate signage and personal rescue equipment (PRE), the presence of contributing, or lack of preventative, design elements in public spaces, including potential competing design outcomes e.g. amenity and safety. All three coronial recommendations outline Council's responsibility for improved engagement and consideration of drowning prevention measures in terms of environmental design and the supporting policy framework.

2.1.1 Inquiry Case Numbers: CSU-2023-AUK-000105 & CSU-2023-AUK-000106 - An inquiry into two fatalities at North Piha Beach

A coronial report¹ finds that on 21 January 2023 two men drowned at North Piha Beach despite rescue attempts by volunteer lifeguards. While playing with a tennis ball in the shallow waters they got into difficulty in the surf. Lifeguards patrolling the beach at the North Piha Surf Life Saving Club (North Piha SLSC) noticed the men in trouble. Rescue attempts were unsuccessful, and both men drowned.

Piha Beach is a popular surf beach on the west coast of Auckland. It is accessible by road and is less than an hour's drive from the Auckland Central Business District (CBD). North Piha Beach is separated from Piha Beach by Lion Rock. There is a river mouth at the southern end of North Piha Beach where two streams (the Marawhara and Weketahi streams) flow out to sea (as shown in Figure 1). There is a permanent rip at this location (at the outflow of the Marawhara and Weketahi Streams) where the men were swimming. The river mouth, at the southern end of North Piha, cannot be seen by the lifeguards at Piha Beach because Lion Rock obstructs the view. The river mouth is within the view of the lifeguards at North Piha; however, it is a significant distance (about 600 metres) away from the lifeguard tower and from where the patrolled flag area is usually set up. The river mouth area is however directly in front of public changing rooms and toilets and a carpark, where the group got changed in the changing rooms and went down to the beach directly in front of there.

¹ Mills, A.J (2024). An inquiry into the deaths of Saurin Nayankumar PATEL and Anshul Pareshbhai SHAH (CSU-2023-AUK-000105 & CSU-2023-AUK-000106). New Zealand Coroners Court.



Figure 1: Map showing key characteristics and facilities at Piha Beach

Both Piha beaches have well-known reputations as being dangerous swimming beaches with permanent rips and rip currents and both beaches have a surf lifesaving club with lifeguards on patrol during the summer months.

The beach was patrolled until 6.00pm that day, however, the patrolled flagged area was 600m north. At 5.45pm, a lifeguard noticed three swimmers, near the river mouth. The lifeguards know this to be a particularly dangerous area because where the Marawhara and Weketahi streams enter the sea. An All-Terrain Vehicle (ATV) was directed to go and make preventative action, by warning the people in the water. This turned into a rescue with lifeguards from the ATV entering the water and an inflatable rescue boat (IRB) launching from in front of the North Piha SLSC. South Piha Surf Life Saving Club (Southern Piha SLSC) also responded with an IRB and Rescue Watercraft (RWC). One of the men was pulled from the water after approximately 11 minutes and another after 20 minutes and CRP commenced. Despite these efforts, both men passed away from drowning.

The coronial report², 21 January 2023, presents the following findings:

2.1.1.1 Signage

Dr Kearney from Drowning Prevention Aotearoa (formally employed at Surf Life Saving New Zealand (SLSNZ)) confirmed that while there are standard warning signs in the North Piha Beach vicinity, there are no signs in the changing rooms. In the opinion of both the coroner and Dr Kearney this is concerning and both advised that it is important to have signs in the changing rooms. The coroner suggests placing signs at public facilities to warn visitors about the dangers of swimming at North Piha Beach and the

² Mills, A.J (2024). An inquiry into the deaths of Saurin Nayankumar PATEL and Anshul Paresbhai SHAH (CSU-2023-AUK-000105 & CSU-2023-AUK-000106). New Zealand Coroners Court.

importance of swimming in patrolled areas. There are signs of this nature by the Surf Life Saving clubhouse, but many visitors may not realise they are not near the patrolled area. Clear signs should direct them to the Surf Life Saving club and the flagged patrol area.

2.1.1.2 Location of change facilities / toilets

The location of the public changing and toilet facilities raises concerns. The two men and their friends, like many visitors, parked in the carpark and used the public changing facilities before heading directly to the beach. These facilities are located at the south end of the beach, just past Lion Rock, near where the two streams flow into the sea. As described above, this area is particularly hazardous. However, it is the first set of public facilities visitors encounter at North Piha Beach. It is unclear why these facilities were built in this location. Dr Kearney agreed with concerns and advised that the placement of the toilets and other public amenities directly influences beach usage patterns. He advised that, when planning coastal developments such as beach accessways, coastal walkways, car parks, playgrounds, and toilets, consultation with SLSNZ or other water safety organisations could prevent numerous instances of amenities being positioned in dangerous spots. He noted that the lack of consultation with Surf Life Saving, and other water safety organisations has led to the inappropriate placement of facilities that not only endanger beachgoers but also complicates the work of Surf Life Saving by altering beach usage patterns.

2.1.1.3 Coroner recommendation

The coroner finds that:

- a) Auckland Council places signs, compliant with the Australia and New Zealand standard, inside the public changing and toilet facilities at North Piha that warn of the dangers associated with swimming at North Piha Beach. Auckland Council supports this recommendation and will action this prior to the 2024-2025 peak season. In addition, Auckland Council is looking to install additional water safety signage at the two accessways to the south of the public changing and toilet facilities. Given the changing nature of the coast, Auckland Council will keep under review its current water safety signage controls and make changes should additional routes or access points be established.
- b) Auckland Council (in conjunction with Surf Lifesaving) consider installing additional water safety signage within public changing/toilet facilities at other high-risk swimming locations across the region.
- c) In consultation with SLSNZ, Auckland Council place wayfinding signs (that comply with the relevant New Zealand standards) that direct visitors to the North Piha Surf Life Saving clubhouse and depict the swim between the flags messaging.
- d) The Auckland Council develop a policy, in consultation with SLSNZ, to ensure Surf Life Saving and any other relevant water safety organisation are consulted about the placement of, or development of any future public amenities near beaches or other waterways.
 - i. Auckland Council advised that its Parks and Community Facilities Department are currently producing a water safety strategy, which seeks to comprehensively establish the risk profile of swimming locations across the region to better target investment into controls and programmes. This strategy is being produced in collaboration with stakeholders that include Surf Life Saving and Drowning Prevention Aotearoa. The strategy will identify those sites that have a high-risk profile, with elevated risk of water related incidents.
 - ii. Auckland Council advised it will consult with stakeholders such as Surf Life Saving and Drowning Prevention Aotearoa at coastal and freshwater locations deemed to have a high-risk profile, on projects seeking to install significant new assets that will encourage people to engage with or are adjacent to the water. This includes carparks, boat ramps, accessways, changing rooms, toilets and playgrounds. Auckland Council therefore considered the recommendation was not necessary.
- e) Auckland Council should review, together with SLSNZ, the location of existing public amenities at beaches or other waterways with a view to identifying those that are located in unsafe positions and to make a plan to remedy any identified concerns in the future. Auckland Council expressed

concern with the scale of this recommendation. It did not think it would be able to manage a review of this size. It advised that the Auckland Council manages approximately 3,200 km of dynamic coastline, and 16,500km of permanent rivers.

2.1.1.4 Summary

The coronial report finds that the placement of the toilets is inappropriate and directly influences beach usage patterns. The coroner recommends signage within the changing room, and additional signage to encourage beach users to continue north and swim between the flags at the lifeguarded area. The coronial report also presents an opportunity for better consultation with between drowning prevention organisations and Auckland Council.

Regardless of whether these recommendations have been implemented, the focus should have been on preventative rather than reactive measures. This situation presents an opportunity to learn and apply the recommendations to other environments around open water bodies.

2.1.2 Inquiry Case Number: CSU-2022-ROT-000500, 13 May 2023 An inquiry into the death at Moturiki Island, Mount Maunganui

A coronial report³ finds that a man died on 12 November 2022 of accidental drowning. The incident leading to his death occurred at Moturiki Island, Mount Maunganui. Figure 2 shows Moturiki Island (Leisure Island) in relation to Mount Maunganui Lifeguard Service Inc.

SLSNZ reported that on 12 November 2022, swimmers at Moturiki Island faced significant hazards, including 1.0 - 1.6 m waves, medium-period swell, strong boundary currents, wave deflection, reflection, and water turbulence. Around 1pm, the man and his daughter, chose to jump from rocks near a blowhole, a popular spot about 10 meters above the water. The man's daughter jumped into the water first and got into difficulty, the man subsequently jumped in and helped his daughter to safety before getting into difficulty himself.

A report provided to the Coroner from SLSNZ, advises that since 1 July 2012 there have been 19 beach and coastal drowning fatalities on Tauranga City Council (TCC) beaches and coastline, of which two occurred at Moturiki Island.

³ Telford, I.A (2023). An inquiry into the death of Reon Graeme Wikeepa (CSU-2022-ROT-000500). New Zealand Coroners Court.

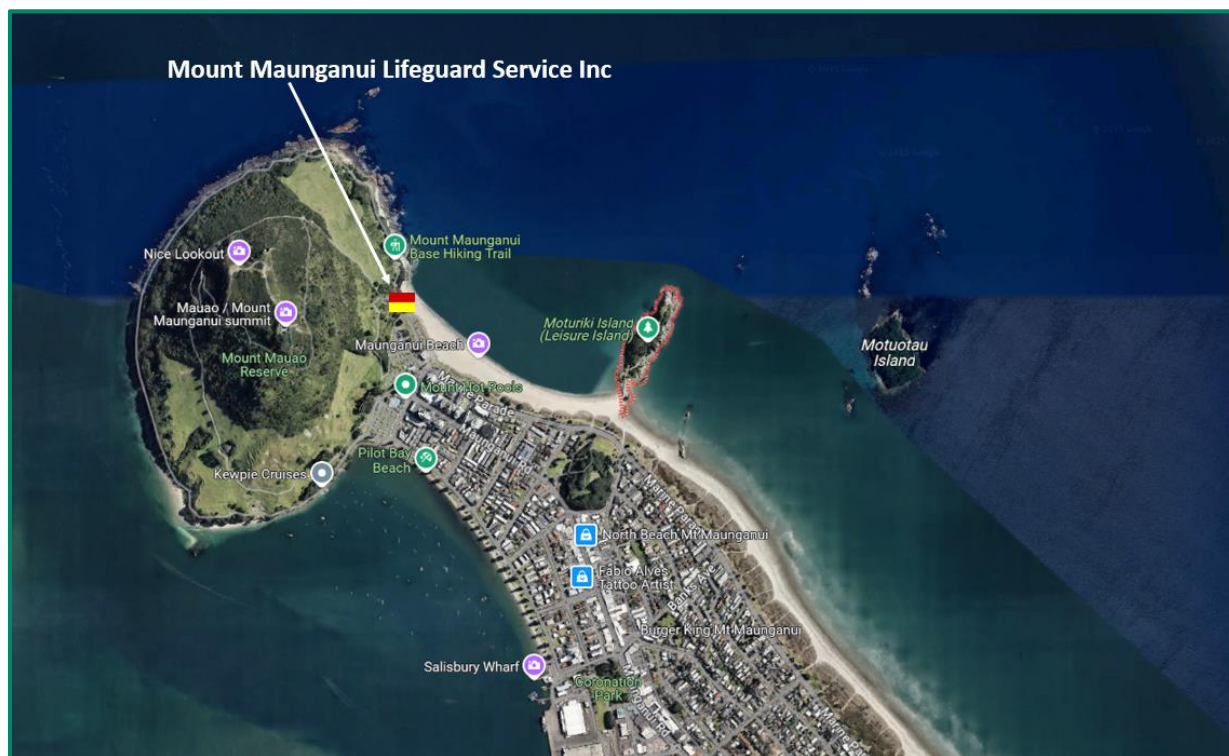


Figure 2: Mount Maunganui environmental features including the surf lifesaving club and Moturiki Island (Leisure Island)

2.1.2.1 Signage

The coronial report highlights there is an Australian/New Zealand standard for water safety signage - Australian/New Zealand Standard 2416:2010 “*Water safety signs and beach safety flags*”, however, compliance is not universal through New Zealand. A large number of coronial findings (including this one) continue to recommend the placement of signage in compliance with the above standard. The coronial report finds that: “This inherently illustrates the ongoing need for nation-wide reform in this area.”

The coronial report also finds that, within the Mount Maunganui Beach and Moturiki Island coastal zone, there was no water safety signs that adhere to Standard 2416:2010. The standard advises that water safety signs should comply with the relevant international standards, which outline graphical symbols for accident prevention and health hazard information. Supplementary text should accompany the symbols to explain their meaning, directly relating to the sign. Standard 2416:2010 states that the selection and use of signs should be based on a risk assessment, considering factors such as hazards, associated risks, and the likely behaviour of users in the aquatic environment.

To better understand these standards, A Guide to Beach Safety Signs in New Zealand⁴ is a guide produced by SLSNZ based upon the internationally recognised Australian / New Zealand Standard 2416:2010 “*Water safety signs and beach safety flags*” administered through Standards New Zealand (MBIE), which is the national standards body for New Zealand. Figure 3 shows the types of signage.

⁴ Surf Life Saving New Zealand (2022). A Guide to Beach Safety Signs in New Zealand. Wellington, New Zealand.

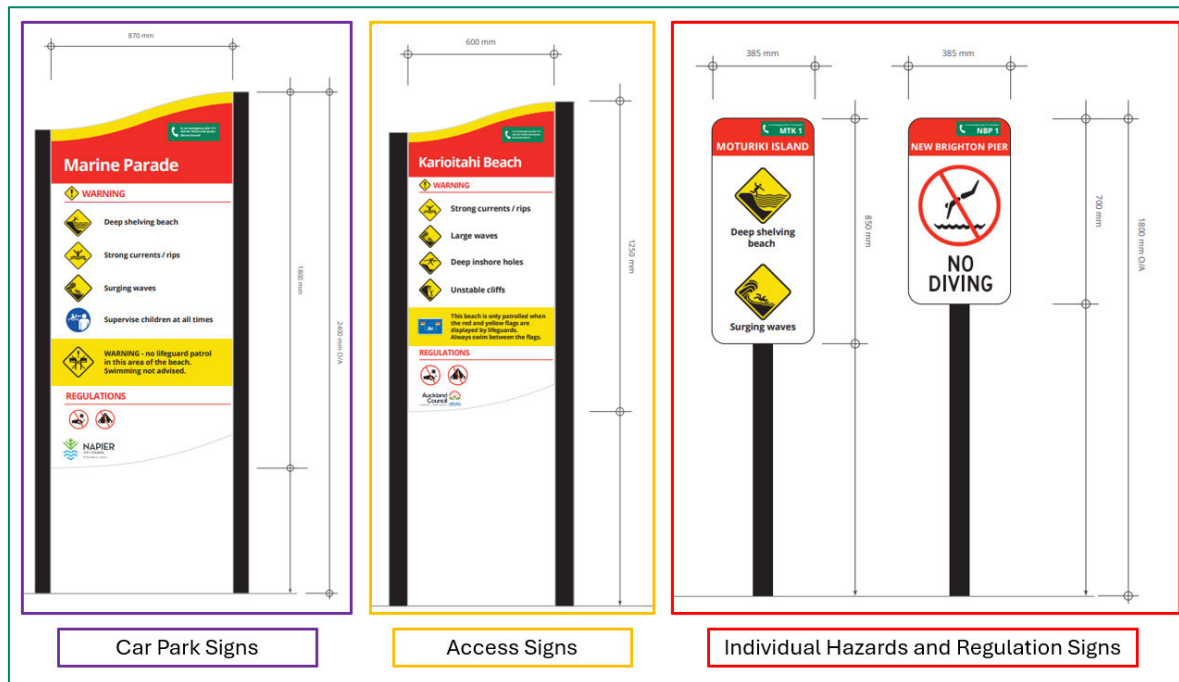


Figure 3: Types of signage as outlined in A Guide to Beach Safety Signs in New Zealand (Appendix C).

2.1.2.2 Public Rescue Equipment

A 2022 survey by SLSNZ found that 9% of New Zealand adults have rescued someone and 7% have been rescued. More than one-half (54%) of rescues occurred at a beach, and almost one-half (46%) of bystander rescues were performed without any rescue or flotation equipment. This lack of any rescue or flotation equipment highlights a broader issue beyond the Mount Maunganui area. Additionally, the coronial report notes that there is currently no Public Rescue Equipment (PRE) available within the Mount Maunganui Beach and Moturiki Island coastal zone.

2.1.2.3 Coroner recommendation

Based on the above advice, the Coroner initially made the following recommendations:

- a. After consulting with SLSNZ, the Tauranga City Council should install appropriate signage on Moturiki and the surrounding coastline, ensuring compliance with Australian/New Zealand Standard 2416:2010. Additionally, following consultation with SLSNZ, Tauranga City Council should urgently place suitable public rescue equipment in the Moturiki and coastal areas.

It became immediately apparent that there were a number of areas that needed further discussion and therefore a Case Management Conference (hearing) at Rotorua Court on 12 May 2023, where it was established the PRE and signage had already taken action in relation to my initial recommendations. Surf lifeguards also identified a number of further key areas of risk. Therefore, the Coroner updated his recommendation:

- a. *SLSNZ and Tauranga City Council will work collaboratively to undertake a coastal risk assessment and agree an implementation plan which will identify the locations where signage and rescue equipment will be beneficial to public safety.*

While not included in the formal coronial recommendation, it was further stated that:

- b. *Other councils to take note of this partnership between SLSNZ and Tauranga City Council and consider how they might adopt a similar 'Gold Standard' approach. It is beyond obvious that the risks discussed in these findings are not restricted to the Tauranga district; our narrow Land of the Long White Cloud is, after all, surrounded by water. To this end, I have directed that these findings are distributed to the Chief Executives of all councils of New Zealand.*

Stuart Crosby, the president of Local Government New Zealand (LGNZ) was asked to distribute these findings to all councils within New Zealand.

2.1.2.4 Summary

Similar to the inquiry into the deaths of the two fatalities at North Piha signage was found to be an issue. The coronial report was directive with how Councils could better plan and design environments near open water bodies.

2.1.3 Inquiry Case Number: CSU-2021-WGN-000267, 11 March 2025, An inquiry into the death of a man at Wellington Waterfront, Wellington⁵.

A 30-year-old man from Porirua, tragically drowned on 10 July 2021 at the northern end of Queens Wharf, Wellington waterfront. On the night of 9 July, the man had been out drinking with friends in Wellington City. Although intoxicated, he was able to walk steadily and declined an offer for an Uber home, stating he would take the train instead. CCTV footage captured him walking alone along the waterfront towards the railway station at 12:37 am, but he was not seen on footage beyond the northern end of Queens Wharf. His backpack was found floating in the water on 12 July, about 100 meters from where his body was later discovered underwater by the Police National Dive Squad on 17 July 2021 near the East by West Ferry berth. The forensic examination confirmed that the man died from accidental drowning. Based on the investigation, the coroner ruled the man's death as accidental.

The Wellington waterfront includes 34,000 square metres of wharf area, approximately 5 kilometres of water's edge and approximately 950 square metres of designated recreational zones. It has several key areas or precincts – North Queens Wharf / Kumutoto; Queens Wharf; Frank Kitts Park; Taranaki Street Wharf / Whairepo Lagoon; Waitangi Park; and the 'promenade' – a shared space of approximately 1.9 km mainly on wharf structures, described as the spine of the waterfront. The promenade connects a series of public open spaces, including the two largest park spaces – Frank Kitts Park and Waitangi Park and is an important commuter link for walking, cycling and scootering – refer Figure 4 below. The promenade varies in width along its length, with the larger areas being important gathering spaces during events. A series of bridges along the promenade connect the different areas.

The waterfront is an important public amenity for Wellington City. It is considered a prominent part of Wellington's identity and is an intensely used area at the centre of the city. It is an area of multiple functions and uses including retail spaces, commercial buildings and offices, hospitality outlets, residential apartments, recreational areas, sports clubs and marinas, working wharves and a harbourside Sunday market. It is the home of Te Papa and is itself a tourist destination. It is the second most commuted area of the city and nearly every space on the waterfront is accessible to the public. Over 30,000 people pass through the Queens Wharf area every week. Use of the waterfront is not limited to daylight hours. There are many bars and restaurants and other venues in the vicinity of the waterfront and members of the public walk along the promenade towards the railway station in the evenings or when they are heading to the nearby establishments on the waterfront or CBD.

⁵ Greig, K.H (2025). An inquiry into the death of Sandy CALKIN (CSU-2021-WGN-000267). New Zealand Coroners Court.



Figure 4: Wellington Waterfront Precincts and Promenade

The coronial report found that the circumstances of the man's death raise important questions about the safety of the waterfront for the public who use it, and presented the following findings:

2.1.3.1 Waterfront Design and Development

Since 2014 Wellington waterfront has been under the direct control and management of Wellington City Council ("the Council"). Council works with various stakeholders and entities but is the lead agency overseeing the development and management of the waterfront, and has direct responsibility for maintaining public safety on the waterfront.

As the entity managing and maintaining the waterfront, Council accepts that it bears responsibility for:

- a) maintaining public safety;
- b) identifying public safety risks (both proactively and reactively);
- c) identifying, tracking, and investigating public safety incidents; and
- d) implementing improvements designed to improve safety.

The Wellington Waterfront Framework ("the Framework"), published in April 2001. The Framework was developed through a public participatory process. It sets out a vision for the waterfront and principles, values and seven objectives to govern future development of the Wellington waterfront area. One of the objectives is ensuring that the waterfront is, and is perceived to be, safe at all times. The Framework notes that developing a safe waterfront for 24-hour use is a key issue. The Framework also notes that lighting is an integral part of public space design and that functional lighting to meet safety standards is important, but specially designed lighting is desirable throughout the waterfront. Since its inception, the

Framework has been the guiding document for all development and activities on the waterfront. The Framework was reviewed in 2012 and reconfirmed. It remains in force today

2.1.3.2 Lighting

In 2005, a Waterfront Lighting Strategy⁶ (“the Lighting Strategy”) was commissioned– the main objective of which was to define nighttime lighting appropriate for each precinct of the waterfront. The Lighting Strategy was designed to provide guidance and structure for designers on appropriate lighting for the building and public places developed on the waterfront, and to facilitate co-ordination of the ad-hoc approach to lighting in each precinct towards an integrated and effective lighting solution.

In May 2011, a partial review of the Lighting Strategy was undertaken, noting that the three year review of the Lighting Strategy recommended for 2008 had not happened, that some of the Lighting Strategy’s detail was “now questionable”, several important recommendations had not been implemented and that a comprehensive review of the Lighting Strategy’s content and effectiveness was overdue.

In August 2022 (post-fatality) Council commissioned Stephenson & Turner Lighting to perform an [external] review of the lighting on the waterfront to advise whether it was sufficient. Stephenson & Turner reported that the waterfront was currently lit in an ad-hoc fashion as its lighting varied in age, condition, design, and aesthetic. It recommended that to make the waterfront a safer destination that there needed to be lighting improvements and replacements for most of the existing lighting.

2.1.3.3 Safety Reviews

The coronial report notes that a number of safety reviews of the waterfront were undertaken applying Crime Prevention Through Environmental Design (CPTED) and Injury Prevention Through Environmental Design (IPTED) principles – Table 1 summarises the findings and recommendations of these reviews⁷.

Table 1 Summary of coronial report discussion on safety reviews

CPTED / IPTED Review	Findings	Recommendations
February 2011 Safety Review ⁸	<p>The review highlighted the need to discuss and confirm the position on the risk/amenity balance having regards to:</p> <ul style="list-style-type: none"> - present inconsistencies in the management of hazards, in particular water edge treatments - the possibility of hazard mitigation techniques being in conflict with other drivers for amenity and design”. - the lack of specific hazard management guidelines for waterfront urban public space. 	<p>The review contained a number of recommendations – some which were noted as likely requiring policy debate.</p> <p>This included the preparation of a reference resource (waterfront design guide) that addressed safety throughout the lifecycle of the asset – to include matters such as obligations, expectations, acceptable solutions – and that addressed consistency of safety design and management across the waterfront.</p>
Second February 2013 Safety Review ⁹	<p>From a CPTED perspective the waterfront was generally safe.</p> <p>From an IPTED perspective the following was noted:</p> <ul style="list-style-type: none"> - inconsistencies in waterfront edge treatments 	<p>The need to find ways to balance seemingly (but not necessarily) competing obligations to converge requirements for safety – especially falling into the water – with amenity.</p> <p>Reconsider the matter of edge protection along the waterfront and to check that all reasonable</p>

⁶ Waterfront Lighting Strategy, 2005

⁷ As set out in paragraphs [73] through [99] of the Coronial Report.

⁸ First CPTED/IPTED Safety Review 2011, Dr Frank Stoks

⁹ Second CPTED/IPTED Safety Review 2013, Dr Frank Stoks

	<ul style="list-style-type: none"> - whether there is a safety barrier or not - the effectiveness of the barrier - the nature of the consequences of the hazard - poor lighting implementation on the waterfront and concern about the approach to safety in the Lighting Strategy <p>The review concluded that, there was a lack of emphasis on IPTED on the waterfront arising from factors such as:</p> <ul style="list-style-type: none"> - design preferences and objectives e.g. preserving historic legacy features and engagement with waters edge - lack of technical guidelines specific to the environment i.e. the waterfront context 	<p>and practical measures had been taken to protect the public where CPTED/IPTED and urban design objectives might be in conflict.</p>
<p>Third CPTED/IPTED Safety Review June 2016¹⁰</p>	<p>The review noted that the approach to IPTED at Wellington waterfront was:</p> <p>...increasingly at odds with what was happening on waterfront edges elsewhere and seemingly the Department of Housing and Construction's determinations.</p> <p>Moreover, waterfront users tripping and falling, including into the water (sometimes fatally), have become credible not fanciful events, with potentially dangerous consequences.</p> <p>Additionally, it was noted that good records were required to plan suitable mitigation and recommended that Council improve its safety and security record keeping – noting that having a history of what has happened is essential for knowing the real risk.</p>	<p>The review recommended that it would be prudent for effective waterfront edge protective measures to be provided:</p> <ul style="list-style-type: none"> - where there is a significant risk of injury from falling; - where the falling height exceeds one metre per the operative Building Code; - where serious injury could occur from falling a lesser distance - in busy or constricted areas where there is a risk of loss of balance or being moved involuntarily; - at gathering points - in places where children are proximate and/or need extra supervision; - where people may be alcohol-impaired; - any other place where there is a credible greater risk of being knocked into the water or falling onto the rock revetments or other injury causing surfaces; - in accordance with the reasonable and practicable obligations of the Health and Safety at Work Act 2015; and - to meet the requirements of NZS4221 Design for Access and Mobility. <p>It also recommended that Waterfront Operations discuss and agree prudent design solutions to resolve conflicts between safety from falling, urban design objectives and legal compliance/due diligence requirements</p>

A further CPTED / IPTED Review was undertaken post-fatality in 2022. This review noted that from a CPTED point of view the waterfront was generally safe. However, in relation to the edges and possible concerns about falls several areas of concern were noted as well as a range of new CPTED and IPTED issues relating to lack of edge protection and inadequate lighting.

¹⁰ Third CPTED/IPTED Safety Review 2016, Dr Frank Stoks

2.1.3.4 Coroner recommendation

The coronial report raised serious concerns about waterfront [public space] safety and recommended that Wellington City Council take urgent action to improve protections at high-risk areas. The coroner recommend that Wellington City Council:

- a) Gives urgent priority to the edge protection workstream of the Waterfront Safety Enhancement Programme, including by ensuring that sufficient budget and other resources are earmarked for this purpose.
- b) Prioritises erecting permanent balustrades around Shed 5 wharf and Kuomoto Precinct in accordance with the recommendations of its draft risk assessment tool and flowchart.
- c) Develops a clearly identified and publicised avenue by which members of the public can report safety incidents on or at Council properties / facilities (whether this is by modification of 'FIXiT' or otherwise as Council deems appropriate).
- d) Develops its 'MySafety' system and accompanying policy so that any time there is a death following a fall into the water at the waterfront, or a non-fatal incident involving a person unintentionally falling into the water, Council's response includes a prompt and appropriately robust investigation that is independent of any police or coronial investigation/process.
- e) Ensures that its policy for investigation of such incidents includes matters such as stipulating the appropriate level of seniority and expertise for those conducting the investigation, the process that is to be adopted, how recommendations from the investigation are assessed and implemented and timeframes.
- f) Considers engaging an expert in human factors issues to conduct a user experience / useability audit of waterfront users to learn about participants' perceptions and how they behave at the waterfront – to help inform waterfront design. Any such audit should be undertaken alongside Council's lighting, CPTED / IPTED and edge protection audits to ensure that the user audit does not delay the work already being undertaken to improve safety at the waterfront.

2.1.3.5 Other Important Issue – Lacuna In Legislative And Regulatory Framework

A further important issue that was raised in the course of the coronial inquiry was that in New Zealand there is not a clear legal framework for public spaces like the waterfront – with expert witnesses noting that a “lack of direction in the regulatory space” meant that there was not well-defined guidance for Council in the Wellington waterfront context. Nor does New Zealand have a clearly articulated public safety risk appetite statement.

The evidence to the coronial inquest made clear that this lacuna has been unhelpful. The direction of a clear legal framework would have helped to ensure a more coherent response to safety at the waterfront – which is a difficult and complex area for WCC to manage.

The report note that a copy of the findings of the coronial report will be sent to the Chief Executives of the Ministry of Business, Innovation and Employment; Department of Internal Affairs; LGNZ, and Accident Compensation Corporation (ACC) to draw attention to this issue.

2.1.3.6 Summary

The inquest raised significant concerns about waterfront safety, noting multiple similar drowning incidents at Wellington waterfront, particularly at night and involving intoxicated individuals. The coroner recommended urgent action by WCC, including the installation of permanent balustrades at high-risk areas, improved public reporting systems for safety incidents, independent investigations for all falls into the water, and enhanced lighting and user-experience studies. Additionally, the coroner identified a gap in New Zealand's legal framework for public space safety and called for clearer regulations to prevent further deaths in similar circumstances.

2.2 Drowning Black Spots in New Zealand

Identifying national high-fatality locations marks a crucial step forward in implementing targeted, evidence-based interventions. Like high-risk zones on state highways and local roads, drowning blackspots are areas characterised by alarmingly high rates of drowning incidents and fatalities. These blackspots account for approximately 18% of all drowning deaths in New Zealand. In 2024, 40% (7) of Auckland’s drownings occurred at identified blackspot locations.

The National Drowning Prevention Report 2024 (Water Safety New Zealand, 2025)¹¹ outlines how drowning blackspots — high-fatality locations — are identified in New Zealand. This process has evolved significantly, with Water Safety New Zealand now using data from DrownBase™ and advanced mapping tools. Key steps in identifying blackspots include:

- GPS mapping of drowning incidents: Historical data (dating back to 1980) is cross-referenced with precise GPS coordinates to identify high-risk zones.
- Bespoke polygons: Unlike the previous 2km-radius method, each blackspot now has a custom-defined area based on drowning clusters.
- Data review: Each drowning case is meticulously analysed to track trends and emerging danger zones.

2.2.1 Time Frame of Data

The black spot data incorporates drowning cases recorded since 1980, with specific location data consistently logged from 1999 onward. The current report reflects a 25-year data set (1999–2024).

2.2.2 Urban and Rural Classification

Based on the New Zealand Statistical Standard for Geographic Areas (SSGA18):

- Major urban: Auckland, Wellington.
- Large urban: Hamilton.
- Medium urban: Mount Maunganui.
- Other rural areas: Papanui Point, Karioitahi Beach.

2.2.3 New Zealand’s Most Dangerous Drowning Black Spots

Below are New Zealand’s 10 most dangerous drowning black spots with details on the access and hazards.

Table 2: New Zealand’s 10 most dangerous drowning black spots

Location	Details
Manukau Harbour — <i>Major Urban (Auckland)</i>	<ul style="list-style-type: none">• Incidents: 54 drowning incidents.• Access: Accessible via multiple points, including boat ramps, wharves, and coastal walkways.• Coastal and Water Hazards:<ul style="list-style-type: none">○ Strong tidal currents — fast-flowing incoming and outgoing tides.○ Mudflats — trapping people as tides rise rapidly.○ Bar crossings — unpredictable, large breaking waves.○ Limited visibility — murky water hides sudden drop-offs and underwater hazards.
Piha Beach (North & South) — <i>Major Urban (Auckland)</i>	<ul style="list-style-type: none">• Incidents: 52 drowning incidents.• Access: Road access with car parks and walking tracks; lifeguard patrols during summer but isolated areas beyond main beach.• Coastal and Water Hazards:<ul style="list-style-type: none">○ Rip currents — strong, fast-flowing, and often hidden.○ Heavy surf — large waves and sudden sets catch swimmers and surfers off guard.

¹¹ Water Safety New Zealand (2025). Water Safety New Zealand Drowning Prevention Report 2024. Retrieved from <https://www.watersafetynz.org/2024-national-drowning-prevention-report>.

	<ul style="list-style-type: none"> ○ Sandbanks and sudden drop-offs — cause unexpected deep water close to shore. ○ Remote zones — outside patrolled areas, rescue efforts can be delayed.
Waikato River (Hamilton city limits) — Large Urban	<ul style="list-style-type: none"> • Incidents: 46 drowning incidents. • Access: Multiple access points through public parks, bridges, and walkways along the riverbanks. • Coastal and Water Hazards: <ul style="list-style-type: none"> ○ Strong currents — deceptively fast even in calm areas. ○ Cold water — causes shock and reduces swimming ability. ○ Hidden debris — rocks, logs, and stormwater runoff create sudden hazards. ○ Bridge jumping — dangerous practice leading to miscalculated dives and injuries.
Muriwai Beach — Major Urban (Auckland)	<ul style="list-style-type: none"> • Incidents: 33 drowning incidents. • Access: Car parks and tracks lead to both lifeguarded and remote areas; surf patrols in summer only. • Coastal and Water Hazards: <ul style="list-style-type: none"> ○ Rip currents — frequent and shifting. ○ Large waves — unpredictable, large waves that overwhelm rock fishers. ○ Steep beach face — sudden drop-offs near the shoreline. ○ Limited access — rescue delays in more isolated spots.
Manukau Heads — Major Urban (Auckland)	<ul style="list-style-type: none"> • Incidents: 29 drowning incidents. • Access: Remote, with limited road access and a focus on boat launches for bar crossings. • Coastal and Water Hazards: <ul style="list-style-type: none"> ○ Bar crossings — extremely hazardous with large, sudden waves. ○ Tidal surges — rapid and dramatic water level changes. ○ Strong offshore winds — increasing risk for boaties and fishers. ○ Emergency access challenges — limited rescue infrastructure in place.
Wellington Harbour — Major Urban (Wellington)	<ul style="list-style-type: none"> • Incidents: 27 drowning incidents. • Access: Highly accessible with wharves, beaches, and boat ramps, plus high traffic from recreational vessels. • Coastal and Water Hazards: <ul style="list-style-type: none"> ○ Strong currents — especially at the harbour entrance. ○ Boat traffic — collision risk for swimmers and small craft. ○ Sudden wind changes — leading to rough, choppy water. ○ Cold water — increasing the risk of shock and hypothermia.
Te Henga / Bethells Beach — Major Urban (Auckland)	<ul style="list-style-type: none"> • Incidents: 21 drowning incidents. • Access: Limited road access, with walking tracks leading to remote areas; lifeguards patrol part of the beach during summer. • Coastal and Water Hazards: <ul style="list-style-type: none"> ○ Powerful rip currents — shifting and hard to detect. ○ Heavy surf — large, sudden waves. ○ Rocky cliffs — dangerous for fishers and hikers. ○ Remote areas — slow emergency response times.
Papanui Point — Other Rural Area (near Raglan) (Waikato)	<ul style="list-style-type: none"> • Incidents: 19 drowning incidents. • Access: Remote, with steep tracks leading to rocky fishing spots; no lifeguard presence or formal rescue infrastructure. • Coastal and Water Hazards: <ul style="list-style-type: none"> ○ Heavy surf — large, sudden waves breaking onto rocks. ○ Steep Rocky cliffs — dangerous for fishers and hikers. ○ Rock fishing dangers — slippery rocks and unexpected large swells. ○ Limited emergency response — slow rescue times due to isolation.
Mt Maunganui — Medium Urban (Bay of Plenty)	<ul style="list-style-type: none"> • Incidents: 19 drowning incidents. • Access: Easy access via roads and walkways; lifeguards patrol main beach but some areas are unmonitored. • Coastal and Water Hazards: <ul style="list-style-type: none"> ○ Rip currents — often hidden by seemingly calm water. ○ Sudden depth changes — underwater channels causing unexpected drop-offs. ○ Crowded conditions — complicating rescue efforts during peak times. ○ Rocky outcrops — hazardous for swimmers and sightseers.

Karioitahi Beach — Other Rural Area (near Franklin) (Auckland)	<ul style="list-style-type: none"> • Incidents: 17 drowning incidents. • Access: Remote beach with 4WD access; limited lifeguard patrol outside peak season. • Coastal and Water Hazards: <ul style="list-style-type: none"> ○ Strong surf and rips — fast-moving currents. ○ Steep cliffs — risk of falling or getting caught by incoming tides. ○ Limited emergency services — poor cell phone coverage and slow rescue response. ○ Unpatrolled areas — swimmers often enter the water without supervision.
---	--

3.0 Worldwide Drowning Prevention Frameworks

Drowning prevention is a global public health priority, addressed through comprehensive, multi-sectoral strategies led by international and national organisations. The World Health Organisation (WHO) advocates for evidence-based interventions, including data collection, public awareness campaigns, environmental measures, legislation, education, and targeted interventions for high-risk groups. Their "Preventing Drowning: An Implementation Guide" emphasizes situational assessments, national water safety plans, multisectoral collaboration, and systematic data monitoring.

The International Life Saving Federation (ILS) introduces the "Drowning Prevention Chain," promoting risk assessment, preventive measures, public education, and standardization of lifesaving practices. Collaboration among sectors ensures effective interventions and consistent safety protocols. National strategies reinforce these efforts.

These frameworks collectively highlight the importance of strategic planning, cross-sector collaboration, public education, and continuous evaluation to reduce drowning incidents worldwide.

3.1 The World Health Organisation (WHO)

The World Health Organisation (WHO) advocates for a comprehensive, multi-sectoral approach to drowning prevention, focusing on strategies that reduce the risk of drowning and save lives.

Key elements of their drowning prevention framework include:

1. **Surveillance and Data Collection:** Monitoring and documenting drowning incidents to better understand their causes and risk factors, helping to guide preventive actions.
2. **Public Awareness Campaigns:** Raising awareness about drowning risks, especially in vulnerable populations such as children, and promoting safety practices, including supervision and water safety education.
3. **Environmental Measures:** Implementing physical interventions like barriers (fencing around water bodies), improving water safety infrastructure (such as lifeguard presence at beaches), and ensuring safer design of recreational areas.
4. **Legislation and Policy:** Advocating for policies that require the installation of safety measures, such as life jackets, and promoting regulations for safe water activities, especially boating, swimming, and water sports.
5. **Education and Training:** Promoting swimming skills, water safety education, and first aid training to equip individuals with the knowledge and skills to prevent and respond to drowning incidents.
6. **Targeted Interventions:** Focusing on high-risk groups such as children, males, and people in lower-income countries or regions, where drowning rates tend to be higher.

WHO supports these actions through regional and country-specific strategies and collaborates with governments, non-governmental organisations, and local communities to implement drowning prevention programs globally.

The WHO's publication, *Preventing drowning: an implementation guide*¹², offers a comprehensive framework to reduce drowning incidents globally. This guide outlines ten evidence-based interventions and strategies designed to assist practitioners—including non-governmental organisations, researchers,

¹² World Health Organization, (2017). Preventing drowning: an implementation guide.
<https://www.who.int/publications/i/item/9789241511933>

government officials, and policymakers—in adopting a strategic, evidence-based, and multisectoral approach to drowning prevention.

Key Components of the WHO's Drowning Prevention Strategy:

1. **Situational Assessment:** Conduct thorough assessments to identify the most pressing drowning issues, their causes, and the populations at greatest risk. This process informs the development of targeted interventions.
2. **Development of a National Water Safety Plan:** Formulate a comprehensive plan that outlines specific actions, responsibilities, and timelines to address identified drowning risks.
3. **Multisectoral Collaboration:** Engage various sectors—including health, education, transport, and urban planning—to implement drowning prevention measures effectively.
4. **Public Awareness and Education:** Launch campaigns to raise awareness about drowning risks and promote water safety education, particularly among vulnerable populations.
5. **Provision of Safe Places for Children:** Establish safe environments, such as day-care centres, away from water bodies to protect young children from drowning hazards.
6. **Installation of Barriers:** Implement physical barriers, such as fencing around water bodies, to prevent unsupervised access, especially by children.
7. **Teaching Swimming and Water Safety Skills:** Provide swimming and water safety education to children and adults to equip them with essential skills to prevent drowning.
8. **Safe Rescue and Resuscitation Training:** Train bystanders in safe rescue techniques and resuscitation to improve survival rates in drowning incidents.
9. **Regulation and Enforcement:** Set and enforce regulations for safe boating, shipping, and ferry operations to reduce drowning risks associated with water transport.
10. **Data Collection and Research:** Enhance data collection and research to monitor drowning incidents, identify trends, and evaluate the effectiveness of prevention strategies.

By implementing these strategies, the WHO aims to provide a structured approach to drowning prevention, enabling stakeholders to develop and execute effective interventions tailored to their specific contexts.

3.2 The International Life Saving Federation (ILS)

The International Life Saving Federation (ILS) has developed a comprehensive framework titled *Drowning Prevention Strategies: A framework to reduce drowning deaths in the aquatic environment for nations/regions engaged in lifesaving*¹³. This document serves as a guide for countries and organisations aiming to implement effective drowning prevention measures.

Key Components of the ILS Drowning Prevention Strategy:

1. **Drowning Prevention Chain:** ILS introduces the "Drowning Prevention Chain," which outlines interconnected control measures to reduce drowning incidents. This chain emphasizes the importance of preventive actions, timely rescue, and effective post-incident care.
2. **Risk Assessment:** Conducting thorough risk assessments is crucial to identify potential hazards in aquatic environments. Understanding these risks allows for the implementation of targeted interventions to mitigate drowning incidents.
3. **Preventive Measures:** The strategy categorizes preventive measures into three levels:
 - **Primary Measures:** Focus on preventing exposure to drowning hazards through public education, awareness campaigns, and the promotion of water safety skills.
 - **Secondary Measures:** Involve reducing the risk of drowning once exposure has occurred, such as implementing supervision protocols and providing safety equipment.
 - **Tertiary Measures:** Aim to improve outcomes after a drowning incident through effective rescue operations and medical interventions.
4. **Multisectoral Collaboration:** ILS emphasizes the importance of collaboration among various sectors, including government agencies, non-governmental organizations, and local communities. Such partnerships enhance the effectiveness of drowning prevention initiatives.

¹³ International Life Saving Federation, (2015). *Drowning Prevention Strategies: A framework to reduce drowning deaths in the aquatic environment for nations/regions engaged in lifesaving*. https://www.ilsf.org/wp-content/uploads/2015/11/20151028_FINAL_Drowning_Prevention_Strategies_ILS_Board_V01.pdf

5. **Public Education and Awareness:** Educating the public about water safety is a cornerstone of the strategy. ILS advocates for widespread dissemination of information regarding safe swimming practices, the dangers of alcohol consumption near water, and the importance of using life jackets.
6. **Standardization of Practices:** Developing and implementing standardized guidelines for rescue operations, lifeguard training, and safety protocols ensures consistency and effectiveness in drowning prevention efforts.

By integrating these components, the ILS aims to provide a structured and effective approach to reducing drowning incidents worldwide. The framework serves as a valuable resource for nations and organisations dedicated to enhancing water safety and preventing drowning fatalities.

4.0 Overseas Examples of Drowning Prevention Strategy

The UK's National Water Safety Forum (NWSF) aims to reduce drowning fatalities by 50% by 2026 through education, community engagement, risk awareness, and data-driven actions, supported by the Local Government Association's (LGA) Water Safety Toolkit, which guides councils in profiling risks, forming partnerships, and implementing local plans, and the UK Drowning Prevention Strategy 2016-2026¹⁴

Australia's Water Safety Strategy 2030 focuses on high-risk populations, locations, and activities, emphasising collaboration, innovation, and equity. The strategy aims to halve drowning rates by 2030 through targeted education, safer environments, and robust data collection. In New South Wales (NSW), the "Places to Swim" initiative supports public access to safe swimming sites by integrating community engagement, safety and accessibility measures, and environmental sustainability. Central to its success is the active involvement of town planners and policy makers, ensuring water safety considerations are embedded into urban planning, infrastructure development, and recreational strategies. This collaborative approach helps create safer, more inclusive aquatic environments.

The strategic areas of focus of these examples are on education and training; data, research, and insights; communication, collaboration, and partnership; leadership, advocacy, and influence; and frontline prevention, search and rescue. Where environment is discussed, the focus is on the characteristics, risks and hazards presented by an environment or place e.g. Coastal (Beaches and oceans), rivers and lakes and so on. However, there is limited focus in the strategies about the actual role of design for aquatic environments in drowning prevention.

4.1 United Kingdom

4.1.1 National Water Safety Forum (NWSF)

The UK Drowning Prevention Strategy 2016–2026, developed by the National Water Safety Forum (NWSF), aims to reduce accidental drowning fatalities in the UK by 50% by 2026 and to mitigate risks among high-risk populations, groups, and communities.

Strategic Themes:

1. **Education and Awareness:** Ensuring that every child has the opportunity to learn to swim and receive water safety education at primary school and, where necessary, at Key Stage 3.
2. **Community Engagement:** Encouraging every community with water risks to conduct local risk assessments and develop tailored water safety plans.
3. **Understanding Self-Harm:** Enhancing understanding of water-related self-harm incidents to inform preventive measures.
4. **Risk Awareness:** Raising public awareness about everyday risks associated with water to promote safer behaviours.
5. **Recreational Safety:** Urging all recreational activity organisations to carry out strategic risk assessments and implement plans addressing key hazards.

¹⁴ National Water Safety Forum, (2015). A future without drowning: The UK National Drowning Prevention Strategy 2016-2026. <https://www.nationalwatersafety.org.uk/media/1005/uk-drowning-prevention-strategy.pdf>

Implementation Framework:

- **Collaboration:** The strategy calls for coordinated efforts among stakeholders, including government agencies, local authorities, educational institutions, and community organisations, to foster a unified approach to drowning prevention.
- **Data-Driven Actions:** Using data from the Water Incident Database (WAID) to identify high-risk areas and populations, enabling targeted interventions.
- **Regular Progress Reviews:** Conducting periodic assessments to monitor progress towards the strategy's goals and to adjust actions as needed.

By focusing on these strategic themes and implementing a collaborative, data-informed framework, the UK Drowning Prevention Strategy seeks to significantly reduce drowning incidents and enhance water safety across the nation.

4.1.2 The Local Government Association (LGA)

The Local Government Association (LGA) has developed a comprehensive Water Safety Toolkit¹⁵ to assist councils in enhancing water safety within their areas. This toolkit offers a structured approach, enabling local authorities to effectively address water-related risks and ensure the safety of both residents and visitors.

Key Components of the LGA's Water Safety Toolkit:

1. **Profiling the Local Area:**
 - **Data Collection:** Councils are encouraged to gather and analyse data on water-related incidents to identify high-risk areas and populations. Utilising resources like the Water Incident Database (WAID) provides valuable insights into local drowning incidents.
 - **Risk Assessment:** Understanding the specific water safety challenges within the community allows for targeted interventions and informed decision-making.
2. **Establishing a Water Safety Partnership:**
 - **Collaborative Approach:** The toolkit emphasises forming partnerships with relevant stakeholders, including emergency services, local organisations, and community groups, to develop cohesive water safety strategies.
 - **Shared Responsibilities:** Defining clear roles and responsibilities among partners ensures coordinated efforts in implementing safety measures.
3. **Developing a Local Water Safety Plan:**
 - **Strategic Planning:** Creating a comprehensive plan that outlines specific actions, timelines, and resource allocations is vital for effective water safety management.
 - **Alignment with National Strategies:** Ensuring the local plan aligns with broader initiatives, such as the UK National Drowning Prevention Strategy, fosters consistency and leverages national support.
4. **Implementing Preventive Measures:**
 - **Public Education and Awareness:** Raising awareness about water hazards through educational campaigns and community engagement is crucial in preventing accidents.
 - **Environmental Modifications:** Introducing physical safety measures, such as clear signage, barriers, and improved lighting in high-risk areas, can significantly reduce drowning incidents.
5. **Monitoring and Evaluation:**
 - **Continuous Assessment:** Regularly reviewing the effectiveness of implemented strategies allows councils to adapt and refine their approaches based on emerging data and trends.
 - **Reporting and Accountability:** Maintaining transparent records of incidents and responses ensures accountability and facilitates informed policy-making.

¹⁵ Local Government Association, (2025). Water Safety Tool Kit. <https://www.local.gov.uk/topics/severe-weather/severe-weather-hub/water-safety-toolkit>

By following the structured guidance provided in the LGA's Water Safety Toolkit, councils can proactively address water safety challenges, fostering safer environments and reducing the risk of water-related incidents in their communities.

4.2 Australia

4.2.1 Australian Water Safety Council (AWSC)

The Australian Water Safety Strategy 2030¹⁶, developed by the Australian Water Safety Council (AWSC), aims to reduce drowning incidents in Australia by 50% by 2030. This strategy builds upon previous efforts, which have already achieved a 26% reduction in fatal drownings over the past decade and a 50% decrease in drownings among children aged 0–4 years.

Key Findings:

- For every fatal drowning, there are three non-fatal drowning incidents.
- Males drown at a rate four times that of females.
- One-year-old toddlers have the highest drowning rate of any age group.
- Rivers and lakes account for 36% of drowning deaths.
- Coastal environments (beaches, ocean, and rocks) account for 41% of drowning deaths.
- 23% of drowning deaths occur during swimming and recreational activities.
- 61% of drowning deaths occur outside major cities.

Priority Areas:

- People: Focus on high-risk groups, including children aged 0–4 years, young people, males, and Aboriginal and Torres Strait Islander peoples.
- Places: Target high-risk locations such as rivers, lakes, beaches, and swimming pools.
- Activities: Address risky behaviours and activities, including swimming, boating, and alcohol consumption around water.
- Water Safety Skills: Promote access to swimming and water safety education for all Australians, including refugees, migrants, and those in regional areas.
- Data and Research: Enhance data collection, research, and evaluation to inform evidence-based interventions.

Guiding Principles:

- Collaboration: Encourage partnerships among governments, non-government organisations, communities, and individuals to implement effective drowning prevention measures.
- Innovation: Utilise new technologies and approaches, such as drones and emergency stations in remote locations, to improve water safety.
- Equity: Ensure all Australians, regardless of location or background, have access to water safety resources and education.

Recommended Actions for Individuals:

- Supervise children at all times in, on, and around water.
- Learn swimming, water safety, and lifesaving skills.
- Wear a lifejacket when boating, rock fishing, or paddling.
- Swim at patrolled beaches between the red and yellow flags.
- Avoid alcohol and drugs around water.

By focusing on these priority areas and adhering to the guiding principles, the Australian Water Safety Strategy 2030 aims to create a nation free from drowning

¹⁶ Australian Water Safety Council, (2021). Australian Water Safety Strategy 2030. <https://doi.org/10.62977/TPLX4043>

4.2.2 NSW Department of Planning, Industry and Environment

The Places to Swim initiative¹⁷, developed by the New South Wales (NSW) Department of Planning, Industry and Environment, aims to enhance public access to safe and enjoyable swimming locations across NSW. This programme focuses on planning, designing, delivering, and managing swim sites to facilitate community engagement with water-based recreation.

Key Components:

1. **Guideline Development:** The *Places to Swim* guideline provides comprehensive information on creating or renewing swimming spots, ensuring communities can benefit from a stronger connection to the outdoors.
2. **Community Engagement:** The programme encourages collaboration with local councils, organisations, and communities to identify potential swim sites and develop them in line with community needs and environmental considerations.
3. **Safety and Accessibility:** Emphasis is placed on designing swim sites that are safe and accessible to all, incorporating features such as clear signage, appropriate facilities, and adherence to water quality standards.
4. **Environmental Sustainability:** The initiative promotes environmentally sustainable practices in the development and management of swim sites, ensuring minimal impact on natural ecosystems.
5. **Funding Support:** The NSW Government has allocated funding to support local councils in the development and enhancement of public swimming facilities, aiming to provide equitable access to quality swim sites across the state.

By focusing on these components, the *Places to Swim* programme seeks to foster a culture of water safety and recreation, enabling NSW communities to enjoy the numerous benefits associated with swimming and aquatic activities.

5.0 Gap Analysis - Current NZ Legislative Processes

This section examines the current policy and legislative processes in New Zealand to identify the current process and key stakeholders. This will involve researching any existing legislative processes or requirements that New Zealand has regarding environmental design, particularly with respect to preventive measures.

5.1 Resource Management Act 1991 (RMA)

The RMA is the main legislation that guides the management of New Zealand's environment. It provides a way for councils and communities to consider and decide on the type of environment they want. The RMA requires that alternative locations or methods be considered when a proposed activity could have a significant negative impact on the environment. The RMA helps guide how land can be used, whether for residential, commercial, or industrial purposes. Local councils develop district plans under the RMA, which set out the rules for land use in their regions. Resource consent is usually granted by local councils (territorial authorities) under the RMA to ensure that the proposed development complies with the district plan and broader regional plans.

¹⁷ NSW Department of Planning, Housing and Infrastructure, (2024). Places to Swim. A best practice guide to get in, on, and around water in NSW. <https://www.planning.nsw.gov.au/sites/default/files/2024-07/places-to-swim-guideline.pdf>



Figure 5: Hierarchy of planning documents in New Zealand

5.2 The Building Act

The Building Act 2004 in New Zealand is a key piece of legislation that sets out the framework for regulating building work to ensure the health, safety, and well-being of people, as well as the protection of the environment. The Act governs how structures and buildings are constructed, altered, demolished, or repaired, provides guidance and standards for the safety of users, including safety from falling e.g. fencing / barriers and signs, and outlines the roles and responsibilities of various parties involved in the building process, such as building owners, designers, builders, and local authorities.

This has relevance as not all buildings/works require resource consent but may still require building consent approval from the local Council. Additionally, some buildings/works can also occur under Schedule 1 of The Building Act¹⁸ without the need for a building consent, including detached, standalone buildings, shelters and shades, platforms, decks and bridges and signage, subject to compliance with the relevant provisions e.g. the requirement for barriers if the performance criteria for the Safety from falling clause is not met¹⁹.

As such there is an opportunity to address aspects of any framework through the Building Act and the building consent approval process.

5.3 The Reserves Act 1977

The Reserves Act 1977²⁰ primarily focuses on the acquisition, control, management, maintenance, development, and use of public reserves in New Zealand. While it doesn't explicitly address water safety or drowning prevention, it does provide a framework for managing reserves that include water bodies. Under section 41 all types of reserves (except local and Government purpose reserves) under the control of or vested in an administering body must be covered by an approved management plan. The purpose

¹⁸ <https://www.building.govt.nz/assets/Uploads/projects-and-consents/building-work-consent-not-required-guidance.pdf>

¹⁹ The Building Act 2004, Clause F4 – Safety from falling, F.4.3.1, *Where people could fall 1 metre or more from an opening in the external envelope or floor of a building, or from a sudden change of level within or associated with a building, a barrier shall be provided.*

²⁰ <https://www.legislation.govt.nz/act/public/1977/0066/73.0/DLM444305.html>

of the management plans is for the use, enjoyment, maintenance, protection, and preservation of the reserve(s) rather than safety of people. The Department of Conservation (DoC) offers a guide for reserve administering bodies, which includes information on creating bylaws and management plans to ensure the safe use of reserves, including those with water bodies²¹. Administering bodies, often government departments, crown entities, or trustees, are responsible for managing land designated as reserves, ensuring its use aligns with the purposes outlined in the Act.

Drawing parallels to Crime Prevention Through Environmental Design (CPTED), this gap analysis aims to compare where CPTED is required through policy, as it presents an opportunity for other prevention measures (such as drowning prevention) to be included. CPTED is not explicitly mentioned in the Reserves Act 1977, however, it grants administering bodies the authority to develop reserve management plans and bylaws that can incorporate CPTED principles to enhance safety and security within reserves. For example, the Manawātū District Council's General Policy Reserve Management Plan outlines the requirement for reserve management plans to establish the desired mix of use and protection for reserves, providing the community with certainty about the function and management of each reserve. While the plan does not specifically mention CPTED, it emphasises the importance of safety and security in reserve management.

The Piha Reserve Management Plan is dated 1999. The purpose of this Reserve Management Plan is to: *provide for the enjoyment of recreational and environmental opportunities in a manner which is consistent with the conservation and enhancement of the unique character and ecological value of Piha. The Piha Reserve Management Plan integrates the management of all the Piha reserves administered by Waitakere City Council.* It is centred around low impact on the surrounding environments and does not reference water safety of drowning prevention.

Under the Reserves Act 1977, reserve management plans do not have a strict time frame for mandatory updates. However, they must be reviewed and revised when necessary to ensure that they remain relevant and effective in guiding the management and use of the reserve. The Act requires that the management plan is reviewed at least every 10 years for reserves that are not Crown land, but this can be done more frequently if needed. This review ensures that the plan continues to align with the changing needs of the reserve, its community, and any legislative or environmental changes.

5.4 Local Government Act

The Local Government Act 2002²² (LGA 2002) is a key piece of legislation in New Zealand that defines the powers, functions, and responsibilities of local authorities, such as city councils and district councils. It provides the framework for the governance and operation of local government in New Zealand, setting out how local authorities should conduct their activities and interact with the public. Topics such as public places, safety and engagement have relevance to drowning prevention measures, and therefore, sections of the GA with these topics included are outlined below.

Table 3: Relevant sections of LGA 2002

Title	Relevant section	Relevance to drowning prevention
The purpose of the LGA	<p>Section 10(1)(a): "To enable democratic local decision-making and action by, and on behalf of, communities."</p> <p>Section 10(1)(b): "To promote the social, economic, environmental, and cultural well-being of communities."</p>	The LGA 2002 underscores the role of local authorities in promoting community well-being and public health.

²¹ A guide for Reserve Administering Bodies - Powers, duties and functions of an administering body under the Reserves Act 1977 (other than a local authority) - [Amended 2.11.16] <https://www.doc.govt.nz/globalassets/documents/about-doc/role/legislation/guide-for-reserve-administering-bodies.pdf>

²² <https://www.legislation.govt.nz/act/public/2002/0084/latest/DLM170873.html>

<p>Public Spaces and Safety Infrastructure</p> <ul style="list-style-type: none"> • Status and powers • Long term plans 	<p>Section 12: This section of the LGA highlights that the Local Authorities have broad powers to manage public spaces.</p> <p>Section 93: This section of the LGA outlines the requirements to have a long-term plan covering a period of not less than 10 consecutive financial years; and include the information required by Part 1 of Schedule 10.</p>	<p>These sections highlight the requirement of local authorities to plan public spaces and infrastructure to ensure that public spaces are safe for the community. This should include water-related facilities.</p> <p>The LGA does not specifically mandate that local councils are required to have drowning prevention / water safety measures. However, the act provides local councils with broad powers and responsibilities relating to the well-being of their communities, which could encompass public safety measures.</p> <p>This could include providing:</p> <ul style="list-style-type: none"> • Lifeguards at beaches and pools. • Fencing and signage to prevent children from accessing unsafe water areas. • Safety equipment, such as life rings, at public beaches or near water bodies.
<p>Emergency Management and Response</p>	<p>Section 64: "Local authorities must, in cooperation with other agencies, plan for civil defence and emergency management within their districts, including the provision of public safety services in emergency situations."</p>	<p>Local authorities must plan for emergency situations. The LGA outlines local government responsibilities for disaster response and public safety. This section has less relevance to a drowning prevention framework, as the policy needs to be proactive rather than reactive.</p>
<p>Community Engagement and Education</p>	<p>Section 82(1): "A local authority must make itself aware of, and have regard to, the views and preferences of persons likely to be affected by, or to have an interest in, the matter."</p> <p>Part 1 schedule 11:</p> <p><i>A long-term plan must contain—</i></p> <p><i>a summary (or other description) of the local authority's significance and engagement policy under section 76AA; and</i></p> <p><i>(b) a reference to where the full policy can be found, which may be done by providing a link to the relevant document on the local authority's Internet site.</i></p>	<p>Local authorities under the LGA are required to engage with their communities and stakeholders to seek their input on matters affecting local residents.</p> <p>In the case of drowning prevention, councils may engage with the public to raise awareness about water safety through education campaigns, workshops, and community programs. This might involve:</p> <ul style="list-style-type: none"> • Partnering with drowning prevention organisations. • Providing accessible information on water hazards in the local area, including signage near dangerous swimming spots and "Safe Swim".

5.5 Council Bylaws

The LGA 2002 is also the key piece of legislation that enables councils to create bylaws. Under this Act, local authorities (councils) are empowered to make bylaws to address specific issues within their jurisdictions, ensuring that local conditions and needs are met. As outlined below, public places bylaws typically focus on regulating activities and behaviours in public areas, ensuring the safety, orderliness, and enjoyment of these spaces for everyone.

Table 4: Relevant Council Bylaws

Bylaw	Details
Auckland Council - Public Safety and Nuisance Bylaw 2013	<p>This bylaw includes aquatic environments such as beaches, foreshores, wharfs, pontoon as "Council controlled public place".</p> <p>This bylaw contains rules about for restricting access to a public place under control of the council. This can be to:</p> <ul style="list-style-type: none"> • protect flora, fauna, land, structures and infrastructure from damage • protect public health and safety • allow for maintenance • allow exclusive use for any group or specified activity.
Wellington City Council Public Places Bylaw 2022	Wellington City Council have a clause in the Public Places Bylaw relating to Lifesaving equipment whereby, the Council may at its discretion authorise on any beach any volunteer life-saving club to provide and use life-saving appliances and boats, and erect and remove any danger notices as necessary.
Christchurch City Council - Marine, River and Lake Facilities Bylaw 2017	This bylaw aims to facilitate the fair and safe use of, and access to, Council marine, river and lake facilities, including those around the estuary, and to protect them from damage.
Queenstown-Lakes District Council - Lake District Council	The Queenstown-Lakes District Council - Lake District Council have multiple boating guidelines for the various lakes within the jurisdiction.
Tauranga City Council - The Street Use and Public Places Bylaw (2018)	<p>The purpose of this Bylaw is to ensure public health and safety is maintained, protect the public from nuisances, minimise the potential for offensive behaviour and to manage Public Places for the wellbeing and enjoyment of the public.</p> <p>It covers a range of activities including commercial activity such as trading and the promotion of goods and services, begging, rough sleeping, busking and entertainment activities and events, and the use of Footpaths for tables and chairs and retail displays.</p>
Tauranga City Council - Beaches Bylaw	<p>The Beaches Bylaw ensures beaches are primarily for recreational purposes and that activities people do at the beach aren't a nuisance and don't impact public safety. It currently covers topics such as vehicles, structures, fires and horses on beaches.</p> <p>It does mention lifeguarding, whereby:</p> <p><i>No person shall interfere with or remove, destroy or damage any sign, navigation structure or aid, or any lifebuoy or lifesaving apparatus erected or maintained on the beach or on any wharf, jetty or landing place thereon.</i></p>
Signage	All Councils mentioned above have a signs bylaw. They generally include rules for permanent and temporary signs on private and public property, including sign location, number, size, content and illumination.

5.6 Restricted Areas

Local authorities and DoC can restrict access to certain open water. Enforcement of these restrictions is typically done through signs, barriers, and regular patrols, with the potential for fines if visitors ignore warnings.

5.7 Injury and Crime Prevention through Environmental Design

Injury Prevention Through Environmental Design (IPTED) deals with harm from non-criminal sources that are usually caused by accidents like tripping, falling, being ensnared. It looks at the details of environmental design in respect of people not being physically harmed, or avoiding spaces that are, or are perceived to be, risky in terms of falling, slipping, tripping or colliding with objects, trapping or twisting limbs and other such sources of accidents and injury.

Crime Prevention Through Environmental Design (CPTED) is presented as a comparison framework to compare and establish how a drowning prevention framework could fit into policy in NZ. CPTED has been identified as a relevant framework to explore how a drowning prevention framework might be integrated into New Zealand's policy landscape. By drawing parallels, CPTED offers a useful model for understanding how environmental design principles can influence safety outcomes.

There are four key overlapping CPTED principles. They are:

1. Natural Surveillance
2. Access management
3. Territorial reinforcement
4. Quality environments

CPTED also identifies three approaches to managing the physical environment that will reduce the opportunity for crime:

1. Natural (human and physical resources)
2. Organised (labour-intensive security)
3. Mechanical (capital or hardware-intensive security)

Some key policies where CPTED is explicitly mentioned in in New Zealand are outlined below:

- a. The New Zealand Crime Prevention Strategy (2002): Promotes a variety of crime prevention measures, including CPTED. It specifically highlights the importance of environmental design to reduce crime opportunities by designing safer, more secure environments. These matters are subsequently considered through planning, design and place management strategies, including under the RMA.
- b. National guidelines for crime prevention through environmental design in New Zealand (Ministry of Environment)²³ were adopted in 2005. Since this time, local Councils have integrated CPTED into their own planning framework and CPTED has become common-place in projects. This encourages good urban design practices that can help reduce crime. While the protocol is not a law, it provides guidelines for local councils and urban planners and mentions CPTED as a crucial element in the design of safer public spaces.
- c. District and Regional Plans: Environmental Design (CPTED) principles, have been incorporated in district and regional plans e.g. the AUP, including in objectives and policies, activity standards

²³ National guidelines for crime prevention through environmental design in New Zealand (Ministry of Environment) (2005)
<https://environment.govt.nz/publications/national-guidelines-for-crime-prevention-through-environmental-design-in-new-zealand/>

and assessment criteria for zones, areas and specific activities to ensure the consideration and application of these principles through to design and layout of development and spaces.

- d. Auckland Design Manual (ADM): Although not directly part of the AUP, the Auckland Design Manual provides specific guidelines that align with CPTED principles. This manual is often used in conjunction with the AUP, notably where offering practical advice on urban design and safety.

5.7.1 Relevance to Drowning Prevention

Similar environmental design principles and approaches to CPTED can be applied to drowning prevention, where the design and layout of water-related environments (such as beaches, walkways/boardwalks, wharves, pools, lakes, and rivers) can influence the likelihood of accidents or drownings.

While there are similarities between the IPTED/CPTED principles and those which are relevant to drowning prevention, a standalone DPTED framework is considered necessary to effectively address drowning prevention due to:

- the complexity of drowning
- the varied nature of aquatic environments, and
- the number of drowning fatalities

6.0 Recommendations

This report emphasises that environmental design is a contributing factor in drowning incidents in New Zealand. Key design issues include access, inadequate signage and personal rescue equipment (PRE). Both Coroners suggest improved collaboration between the Council and drowning prevention organisations to enhance environmental design and frameworks.

Both the United Kingdom and Australia offer relevant examples of how a framework can be developed to guide local authorities and stakeholders in designing environments that incorporate preventative measures, potentially reducing the risk of drowning.

The report also identifies a clear gap in the legislation and policy requiring the local authorities to consider such measures when planning and designing environments around and near open bodies of water.

From the coronial reports in Section 2.1.1 and 2.1.2 it can be found that local authorities often wait until a drowning occurs to action preventative measures (EG signage and PRE) i.e. take a reactive approach.

There is an opportunity to be proactive in this space through the creation of a drowning prevention framework that can be used by local authorities and stakeholders in the management and design of these public places.

It is recommended that a DPTED framework is generally based on the following CPTED principles:

- a. Natural Surveillance
- b. Access management
- c. Territorial reinforcement
- d. Quality environments

Similar to CPTED, the drowning prevention framework should have relevant principles and approaches that contribute to a reduction in drowning in New Zealand. With opportunity to develop further, below is a preliminary recommendation for the guiding principles of a Drowning Prevention Through Environmental Design framework.

DPTED Principle	Explanation
Natural Surveillance	<p>This principle is about maximising visibility.</p> <ul style="list-style-type: none"> • Water-facing design for passive surveillance. • Design to promote active surveillance (such as lifeguarding). • Ensure available PRE.
Access management	<p>Methods are used to attract people and vehicles to some places and restrict them from others.</p> <ul style="list-style-type: none"> • Attract people to safer places to swim / lifeguarded beaches. • Appropriate signage to guide people.
Risk evaluation	<p>Collect useful drowning data and use it to better understand the site-specific risk and create appropriate drowning mitigation strategies.</p> <ul style="list-style-type: none"> • Risk Assessment undertaken. • Site-specific signage based on risk evaluation: Standard 2416:2010 states that the selection and use of signs should be based on a risk assessment, considering factors such as hazards, associated risks, and the likely behaviour of users in the aquatic environment.
Stakeholder engagement	<p>Multisectoral Collaboration</p> <ul style="list-style-type: none"> • Engaging with the correct and appropriate stakeholders to better understand drowning prevention measures.
Community Education	<p>Public education and awareness</p> <ul style="list-style-type: none"> • Increase and promote the use of SafeSwim²⁴ to show the public when and where swimming is appropriate. • Collaboration with other digital platforms including search engines and maps applications e.g. google, GIS etc

While the framework above is recommended to be developed, there is a gap in policy for how and where it should be considered by local authorities in New Zealand.

Below is a summary of recommended options and the process for how this could be included:

Legislation	Opportunity
LGA 2002 Council Bylaws	<p>The LGA 2002 does not directly address drowning prevention, however, local and regional councils play a critical role in creating and maintaining conditions that could help prevent drownings, such as safe public water spaces, education, and community awareness campaigns.</p> <p>Local boards often provide recommendations to the Council on bylaws that affect their communities. They can identify issues that require regulation at the local level and propose new bylaws or changes to existing ones. Although local boards have significant influence, they generally do not have the final authority to create or enact bylaws themselves. Instead, they provide recommendations to the governing local council (such as a city, district or regional council), which has the final decision-making power. Councils generally have internal bylaw-making policies that help determine how bylaws are developed, reviewed, and implemented. Councils are also allowed to create bylaws under section 145 of the LGA 2022.</p> <p>Through DPA's relationship with Councils and local boards, they could lobby Councils and Local Boards to update bylaws that relate to open spaces or beaches to include principles included in a drowning prevention framework (above).</p>

²⁴ <https://safeswim.org.nz/about>

Local Government (Auckland Council) Act 2009	<p>Auckland has a distinct local governance structure as a unitary authority, which is governed by the Local Government (Auckland Council) Act 2009 (LGACA). This Act outlines the powers of local boards within the Auckland Council, establishing a framework for the delegation of bylaw-making responsibilities between the local boards and the governing body of the Council.</p> <p>The Auckland Council employs a mixed approach to bylaw-making. Local boards have the authority to create certain bylaws for their areas, such as park management or local environmental regulations, while still adhering to the policies established by the governing body.</p> <p>Local boards in Auckland are specifically empowered to make recommendations regarding bylaws and can directly create bylaws for local activities under certain conditions, depending on the subject matter involved.</p> <p>Through DPA's relationship with local boards, they could lobby Local Boards to advise local Councils that there is a requirement to update bylaws that relate to open spaces or beaches to include principles included in a drowning prevention framework (above).</p>
Reserves Act 1977	<p>There is an opportunity to incorporate drowning prevention principles into reserve management plans. However, in the absence of specific direction from the Reserves Act 1977, otherwise, it would remain voluntary for councils to include these principles.</p> <p>Changing the Reserves Act 1977 would require a formal legislative process.</p> <p>There is further opportunity within the reserve management plans while ones are under review to include drowning prevention principles. For example, Wellington City Council is currently updating its Coastal Reserves Management Plan. This plan aims to provide direction for the management, protection, and enhancement of Wellington's coastal reserves, parks, and beaches. The intention is to create an integrated coastal reserve management plan that will replace the existing South Coast Management Plan 2002. Public consultation has been conducted to gather input from the community, and a summary of the feedback received will be provided. Further public consultation on the draft plan is expected to follow in early 2025.</p>
Resource Management Act 1991	<p>As the primary legislation that guides the management of New Zealand's environment, the RMA provides a way for Councils and communities to consider and decide on the type of environment they want.</p> <p>There is an opportunity to incorporate drowning prevention principles into the resource management act which in turn could require specific consideration of the issue through national and local strategic planning policy through to the application of the district and regional plans.</p> <p>Changing the Resource Management Act 1991 would require a formal legislative process. However, there is an opportunity to provide recommendations and make submissions on the inclusion of drowning prevention principles through the current RMA reforms process the government is undertaking.</p>
Building Act 2004	<p>The Building Act 2004 is the primary legislation that governs how structures and buildings are constructed, altered, demolished, or repaired, and provides guidance and standards for the safety of users. It also outline the roles and responsibilities of the various parties involved in the building process, such as building owners, designers, builders, and local authorities.</p> <p>Changing the Building Act 2004 would require a formal legislative process.</p> <p>There is an opportunity to incorporate drowning prevention principles into Building Act 2004 in relation to the construction of new or alteration of existing buildings/structures, including in relation to activities which are exempt from needing a building consent under Schedule 1 of the Act.</p>

Conclusion

This report has identified inadequacies in the current environmental design around water bodies in New Zealand, which may contribute to the risk of preventable drownings. While there are existing measures aimed at water safety, these often focus on reactive responses or education developing water competence rather than preventative strategies embedded in environmental design.

Comparative examples from the United Kingdom and Australia demonstrate that it is possible to develop a comprehensive framework for drowning prevention through thoughtful and strategic environmental design. However, a similar framework is currently lacking in New Zealand, where the policy surrounding water safety and environmental design is fragmented and not explicitly linked.

This gap in policy means that opportunities for the incorporation of preventative measures through environmental design and planning are not being fully utilised, particularly at the local level. By addressing this gap, New Zealand could benefit from a more cohesive approach to drowning prevention, ensuring that future design and development around water bodies incorporates preventative design principles that minimise drowning risks. Developing such a framework would not only align with international best practice around drowning prevention, but also ensure that preventative safety measures are in place to minimise the likelihood of incidents occurring in the first place.

To progress the development of this framework the following next steps are recommended:

- Conduct a cost-benefit ratio assessment to provide evidence of the monetised benefits and costs associated with the development of the frameworks.
- Engage with iwi, water safety, and other key stakeholders, particularly at the local level — including council organisations and local boards — to advocate for the integration of DPTED principles into by-laws, reserve management plans, key strategies, and guidance documents.
- Raise awareness of the issue and promote the development of a standalone DPTED framework across academic circles, central and local government bodies, relevant disciplines such as planning and urban design, and at the public and community levels, as a solution to specifically address the gap in drowning prevention policy.
- Identify key opportunities to influence policy development, such as through Resource Management Act (RMA) reforms, District and Regional Plan reviews, and local and regional council strategies and policies.
- Secure funding for the next phase(s) of work to support the development of the DPTED framework.