

Submission on Going for Housing Growth to the Ministry of Housing and Urban Development

14 August 2025

Tēnā koutou

Introduction

1. Herenga ā Nuku Aotearoa, the Outdoor Access Commission, is the Crown agent responsible for providing leadership on outdoor access issues. Our role is to advise on and advocate for free, certain, enduring, and practical access to the outdoors.
2. The Walking Access Act 2008 empowers Herenga ā Nuku to provide national leadership on outdoor access by preparing and administering a national strategy, coordinating outdoor access among central and local government organisations, and advising the Minister on outdoor access.
3. In relation to this consultation, we want to ensure that new housing developments incorporate outdoor access and off-road connectivity for their residents.
4. This submission addresses two questions in the consultation document: How should spatial planning requirements be designed, and what aspects of capacity would benefit from greater consistency?

The value of public outdoor access

5. Connective outdoor public access provides for an important mix of recreation and transport activity. A good bike trail can be both a recreation asset that promotes wellbeing and a transport asset that addresses economic, climate, health, productivity, and transport pressures. For instance, many of the bike trails around Queenstown were built as recreation assets (with one eye on tourism), but they have also become busy commuter pathways.

6. Off-road access and connectivity are key for local communities to achieve their recreational, transport, health, and economic goals.

The role of Herenga ā Nuku

7. Herenga ā Nuku has the expertise to help our greenfield and brownfield areas develop good public outdoor access for their growing populations
8. Currently, we are working with communities to the north and south of Auckland, designing networks of trails and outdoor access for those communities.
9. In and around Matakana, we are working in partnership with Auckland Council, the Matakana Coast Trail Trust, Ngāti Manuhiri, the Department of Conservation, and the NZ Transport Agency to create a network of trails on Auckland's northern boundary, from Pūhoi to Mangawhai.
10. To the south, we worked with the Waikato District Council, the Waikato Regional Council, and the Franklin Local Board of Auckland Council to create a report on connecting between growing communities and across regional boundaries.
11. The Connecting Franklin-North Waikato Report identifies the need for routes that would create a network of largely off-road tracks and trails for walking, cycling, and, where appropriate, horse riding. The report helped prompt development of the trails targeted rate programme in Franklin.

Consultation Q1: What does the new resource management system need to do to enable good housing and urban development outcomes?

12. Good urban development outcomes include walkable communities and enhanced connectivity to natural amenities, including public open spaces, waterways, treescapes and rural landscapes. These outcomes need to be enabled in the new resource management system.
13. Space for nature and space for human connectivity are intertwined. Both help determine good urban development outcomes. Well-designed outdoor access provision overlaps significantly with open space connectivity, biodiversity corridors, and consistent riparian margins.
14. Without a specific requirement to consider public access throughout planning processes, there is a risk that it will continue to be treated as an afterthought or only considered by well-resourced territorial authorities. The spectrum of planning processes across councils at present varies from those leading the way, to one-line

policies in District Plans that support public access to and along waterways and coastlines, or council transport policies that focus on roads and vehicles with little or no investment in active transport infrastructure.

15. Therefore, public access should be considered from the outset at all levels of the new resource management system.

Consultation Question Q2: How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?

16. Outdoor public access and off-road tracks and trails play important roles in all development. These pathways that do not follow built roads are safer and more enjoyable for walkers, cyclists and micromobility users, and they free up our roads, making them more efficient for other road users.
17. To ensure connective outdoor access, it is crucial to first put in place easements and access rights. This protects people's quality of life and access to the outdoors before construction begins on building or rebuilding houses, suburbs and infrastructure.
18. Our northern cities of Auckland, Hamilton and Tauranga are rapidly pushing greenfield areas outwards or subsuming them. We need long-term planning and development that is well-thought-out. That means providing a legal public access network that allows for off-road walkways, cycleways and tracks that connect people in these new homes to all the facilities around them and to neighbouring suburbs. We must get this right before the greenfield areas convert to suburban areas, because retrofitting good public access connectivity into an already developed site is less effective and far more expensive.
19. A greater commitment to public access in new town planning helps active transport to schools, workplaces and recreation areas. It minimises the need for surplus cars, improving safety, emissions, and the economy.
20. Herenga ā Nuku, as the statutory Crown agency responsible for outdoor access, has unique local expertise in the form of our regional field advisors, operations staff, and GIS team, who can support planners who work with developers and local councils about potential outdoor access opportunities on land before housing developments are designed.
21. The alternative – retrofitting off-road tracks and trails into urban environments – is expensive and complicated. It involves well-considered planning and negotiation to

secure access to the appropriate land. There is less risk to economic investment if comprehensive, connected off-road public access is established at the start of any development project.

22. Herenga ā Nuku has the skills and knowledge to develop pre-agreed guidelines and advice for councils that will not add significant cost or time to planners' and developers' timelines.

Consultation Question 10: What aspects of capacity assessments would benefit from greater prescription and consistency?

23. One of the capacities that any development should consider is the amount of outdoor access and off-road connectivity it provides to its future residents.
24. A significant issue regarding outdoor access capacity is providing enough opportunities for residents of large cities to access the outdoors.
25. New Zealand has some excellent outdoor access infrastructure that provides both recreation and active transport opportunities. However, many of our best outdoor resources are far away from our significant populations. Kauri dieback has exacerbated this problem for Aucklanders, closing some access in the Waikare and Hunua Ranges and other nearby parks.
26. In our experience, territorial authorities and councils take a wide range of approaches to legal public outdoor access. If Herenga ā Nuku were involved in the initial stages of planning for new housing developments, we could ensure greater nationwide consistency of approach. This would reduce compliance costs because developers would know what was required for each project in advance and give developers greater assurance of a predictable outcome.
27. Developers generally support outdoor connectivity, and most local councils have greenways plans and some have the capacity to develop a coherent public access connectivity plan. Herenga ā Nuku can help the government develop a coherent, consistent structure for connected outdoor access that all councils can apply to greenways plans.
28. Herenga ā Nuku can offer to create a nationally coherent strategy and advice that goes into the legislation.

Recommendation: Include a legislative requirement that territorial authorities consult with an outdoor access and recreation planner about public outdoor access opportunities during the initial stages of any new housing development.

Recommendation: Require Herenga ā Nuku to develop a consistent nationwide set of standards for public outdoor access on new housing developments that developers and councils can apply and rely on as part of their planning process.

Conclusion

29. Herenga ā Nuku can provide central and local government with efficient, nationally consistent advice on public access that will improve the predictability and efficiency of the process for developers.
30. We believe that incorporating this advice into the proposed legislation would enhance the housing growth strategy by giving all those involved certainty that the important issue of public outdoor access is resolved early and efficiently in any development plan.
31. We would welcome an opportunity to speak to this submission, if appropriate. Our contact details are Phil Culling, Acting Chief Executive, [+64 278158521](tel:+64278158521) or phil.culling@herengaanuku.govt.nz.



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