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PDP Hearing 1 topics

- Strategic Direction
- PDP-wide and General matters

STRATEGIC DIRECTION

We seek amendments to several *Strategic Direction* Objectives, outlined below

Strategic Direction - Social Prosperity SD-SP-O1

- ❖ We support s42 report recommendation to add: 'belonging, connection to the environment and inclusiveness'
- ❖ We oppose s42 report's recommendation to delete 'place'
- ❖ We seek to retain 'place' - as shown below -

SD-SP-O1: *'Community wellbeing is heightened by a sense of place, belonging, connection to the environment and inclusiveness'*

Justification:

- *Strategic Direction Overview* in PDP states that its strategy is 'based on' and aligns with FNDC's *Far North 2100* vision for the next 80-years (details Box 1 below).
- *Far North 2100*¹ stresses the importance of *place*, and notes with concern that some parts of the district 'have lost their sense of *place* and purpose'; and confirms that:
 - Council's *place*-making role has a direct impact on communities in the Far North (p.15)
 - 'Community wellbeing is bolstered by a sense of *place* and purpose. This will be achieved by: Taking a *placemaking* approach to urban planning. This aims to: ensure that the wellbeing of the people who live in and visit towns and places in the Far North is considered first when it comes to planning towns and places' (p.15)

Various submitters provided reasons and support for the concept of *place* -

- Kairos Trust and Habitat For Humanity (S138.001, S138.003):
 - 'community wellbeing is heightened by a sense of *place*...'
 - 'the wellbeing of people who live in the Far North should be prioritised when it comes to planning *places* and spaces'
- K Kerr (S302.001): 'Sense of *place*... is about creating a sustainable and vibrant community for all'
- A number of Maori submitters highlighted the importance of *place* to Maori, for example Te Rūnanga o Te Rarawa (S571.006), Te Hiku Iwi Development Trust (S399.008, S399.011) and others.
- A Riddell ((s431) noted the importance of 'sense of *place*'.
- Our Kerikeri Trust and other submitters (e.g. s338, s522, s449) also supported the sense of *place* and linked it to the distinctive character of places/areas, and amenity values:
 - 'PDP provisions... need to place greater emphasis on character and amenity values, and promote '*placemaking*' and other aspects that communities value'.

¹ FNDC (2021) *Far North 2100* <https://www.fndc.govt.nz/Your-Council/Policies-by-laws-and-strategies/strategies/far-north-2100>

- 'Amend PDP policies/rules to have particular regard to 'maintenance and enhancement of *amenity values*' (required by s7 of the RMA) and include provisions that will protect the traditional and/or distinctive character of townships and rural areas, and other characteristics that are valued by local communities'.

Box 1 background: PDP states that its strategy is based on *Far North 2100* vision

PDP *Strategic Direction* states that its strategy is 'based on' *Far North 2100* vision, and the Strategic Directions are intended to demonstrate 'alignment with' *Far North 2100* vision,² as follows -

- 'This strategy is **based on** the Council and Community vision He Whenua Rangatira...' – this statement refers to *Far North 2100* 80-year vision document.
- 'The Strategic Directions reflect those factors which are considered to be key to achieving the overall vision for the pattern and integration of land use within the Far North District.'
- 'The Strategic Directions are intended to demonstrate [inter alia] ... **Alignment with** Council's aspirations for the development and environmental quality of the district **as expressed through *Far North 2100*** - an 80 year strategy for the district'

However, some aspects of *Strategic Direction Objectives* are not currently consistent with the *Far North 2100* vision.

- ❖ We seek to improve alignment with relevant aspects of FNDC's *Far North 2100*.

Strategic Direction - Economic Prosperity SD-EP-O4

- ❖ We support s42 recommendation to add '...transport network that is safe, efficient and sustainable'
- ❖ We oppose s42 report's recommendation to reject 'multi-modal'.
- ❖ We seek to add: '...multi-modal transport network.... and enables active transport' - as shown below -

SD-EP-O4: '*People, businesses and places are connected digitally and through an integrated multi-modal transport network that is safe, efficient and sustainable, and enables active transport*'

Justification:

- *Northland Regional Policy Statement* guidance on connectivity in *Regional urban design guidelines* 'places a high priority on walking, cycling...'³
- *Far North 2100* actions support walking, cycling:
 - 'implementing an improved multimodal network built to accommodate walking, cycling and alternative modes of transportation'
 - 'Plan urban areas around walking instead of planning around roads' (p.20)

² FNDC (2021) *Far North 2100* <https://www.fndc.govt.nz/Your-Council/Policies-by-laws-and-strategies/strategies/far-north-2100>

³ NRC (2018) *Regional Policy Statement*, p.165, Appendix 2, Part B Regional urban design guidelines, <https://www.nrc.govt.nz/resource-library-summary/plans-and-policies/regional-policy-statement/regional-policy-statement/>

- Active transport brings many benefits such as improving physical and mental health, reducing emissions, reducing traffic congestion, providing low-cost transport options for users.
- Multiple submissions noted the important role of active transport and/or multi-modal transport, e.g. Waka Kotahi NZTA (S356), Public Health Northland (S516.040), Ministry of Education (S331.030), Vision Kerikeri (S521.004, s521 page 3, s522.038, s524.006), Our Kerikeri Community Trust (S271.006, s338), Carbon Neutral Trust (S529.071), Kapiro Conservation Trust (s446.006, s449.017), Kiwi Fresh (S554), Twin Coast Cycle Trail (S425.008), JA Riddell (s431.155), supported by FS243.046 and others.

Strategic Direction - Urban Form SD-UFD-O3

- ❖ We support s42 recommendation to add 'and additional infrastructure'
- ❖ We seek to add: '... planned and funded' as follows -

SD-UFD-O3: '*Adequate development infrastructure and additional infrastructure is in place or planned and funded to meet the anticipated demands for housing and business activities*'

Justification:

- Infrastructure needs to be further advanced, not just 'planned' on paper.
- If infrastructure is not provided by developers, funding needs to be secured and identified in Council LTPs or committed by government or other sources.
- Many councils collect Financial Contributions (under RMA) and/or Development Contributions (under LGA) to contribute to infrastructure and reduce the burden on ratepayers.
- However -
 - FNDC does not require Development Contributions, although community groups have pressed Council for years to reinstate contributions
 - ODP & PDP don't require Financial Contributions (other than esplanade land)
- Submitters such as Ngati Hine, Vision Kerikeri (S522.032, s522.033), Kapiro Conservation Trust (s449.011), Our Kerikeri Trust (s338.010) and Carbon Neutral Trust (s529.009) made points about infrastructure –
 - 'Having relevant infrastructure *in place* should be a prerequisite for future development'
 - 'The provision of necessary infrastructure must be high priority in PDP policies/rules. Given the Council's funding constraints, we consider that developers should normally be required to provide the necessary infrastructure, including items such as on-site community wastewater systems.'

Strategic Direction - Rural Environment SD-RE-O1 and O2

We seek further discussion on *Strategic Direction* text relating to rural environments to ensure that the following aspects are better protected –

- ❖ Protect strictly finite resources, particularly versatile soil and good quality land for farming and horticulture to support food security, economic wellbeing and provide for future generations
- ❖ Protect the existing high-value irrigation infrastructure asset (extensive network of underground pipelines) in the vicinity of the horticulture zone

- ❖ Draw up clear criteria for assessing where development should occur on versatile soil or good quality land, aiming for compact urban form, avoiding ribbon development and sprawl, enabling improved connectivity etc.
- ❖ It is desirable to revisit and review Strategic Direction text on Rural Environment after future Hearings relating to the rural environment

Strategic Direction - Natural Environment SD-NE-01

- ❖ We seek to add: 'indigenous biodiversity...' for clarification, as follows -

SD-NE-01: '*A culture of stewardship in the community that increases the district's indigenous biodiversity and environmental sustainability*'

Strategic Direction - Natural Environment SD-NE-03

- ❖ We seek to add: 'to protect intrinsic values and' ... as follows -

SD-NE-03: '*Active management of ecosystems to protect intrinsic values and maintain and increase indigenous biodiversity for future generations*'

Justification:

- RMA s7 matters require Councils to have particular regard to '*intrinsic value of ecosystems*'
- Intrinsic value is a significant overarching concept that should be stated in the *Strategic Direction*
- s42 report recognized intrinsic values concept and suggested addressing it in later chapters, but we consider this important concept should also be included in *Strategic Direction*
- Several submitters noted the need to recognise intrinsic values, e.g. A Riddell (s431.168), supported by submitters such as FS332.168 and FS404.058.

Strategic Direction - Natural Environment SD-NE-04

- ❖ We seek to replace 'carbon emissions' with 'greenhouse gas emissions' as follows -

SD-NE-04: '*Land use practices mitigate climate change by enabling carbon storage and reducing greenhouse gas ~~carbon~~ emissions*'

Justification:

- FNDC's *Climate Action Policy* ⁴ refers to greenhouse gases -
 - Definition: 'Emissions reduction – means reducing greenhouse gas emissions' (p.8)
 - Policy: 'actions to mitigate greenhouse gas emissions...' (p.1)
- Several PDP provisions use the term *greenhouse gas*. Examples -
 - TRAN-06: 'supports urban environments designed to reduce greenhouse gas emissions'

⁴ FNDC (2023) *Climate Action Policy*, https://www.fndc.govt.nz/_data/assets/pdf_file/0013/24250/Climate-Action-Policy.pdf

- TRAN-P2: 'supports reductions of greenhouse gases from vehicle movements'
- REG-O2: Renewable electricity generation activities 'contribute to the reduction in greenhouse gas emissions...'

Strategic Direction - Natural Environment SD-NE-05

- ❖ We seek to add: '...environment, waterbodies and their margins and outstanding natural features are valued and managed'... as follows -

SD-NE-05: *'The natural character of the coastal environment, waterbodies and their margins and outstanding natural features and landscapes are valued and managed to ensure their long-term protection for future generations'*

Justification:

- RMA s6 matters include water bodies and their margins
- A number of submitters provided reasons for the PDP to give greater protection to water in matters that are relevant to the district plan

Revisit *Strategic Direction* chapter

- ❖ We seek: *Strategic Direction* chapter to be included among matters to be revisited and reviewed again later in the PDP Hearing process – to check for consistency etc

Justification:

- Subsequent PDP Hearings may identify significant matters that need to be included or addressed in the *Strategic Direction* chapter
- Revisiting *Strategic Direction* chapter would provide opportunity to ensure coherent and consistent approach with other PDP chapters

PDP-WIDE MATTERS AND GENERAL MATTERS

We wish to highlight several PDP-wide matters -

PDP-wide matters: Climate focus

- ❖ We seek PDP provisions that cover climate matters in all aspects relevant to a district plan e.g. ensuring compact urban form; requiring greenways and cycleways in new developments; requiring permeable surfaces where feasible ...

Justification:

- When preparing a district plan, RMA s74(2) requires councils to have regard to the national *Emissions Reduction Plan*⁵ and *National Adaptation Plan*⁶ (made under the Climate Change Response Act).
The national *Emissions Reduction Plan* and *National Adaptation Plan* specify a number of actions that are relevant to district planning, such as planning urban form, active transport, infrastructure.

⁵ *First Emissions Reduction Plan* <https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/emissions-reductions/erp/>

⁶ *National Adaptation Plan* <https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/adapting-to-climate-change/national-adaptation-plan/>

- Various submitters seek the PDP to be amended to include policies/rules that will reduce climate emissions related to activities covered by district plans, and address climate action as a matter of emergency, e.g. s521.002, s521.003, s443.002, s443.003, s529.048, s529.049

FNDC's Climate Road Map⁷ identifies four streams of action on climate matters, shown below. Provisions in the PDP should support all aspects of the Road Map action streams that can realistically be covered in a district plan -

1. Walk the talk: action by Council itself
2. Reduce emissions: Council will support communities to achieve net zero carbon by 2025
3. Future proofing: Council will prepare for and adapt to the impacts of Climate change
4. Community resilience: Support communities to prepare for and adapt to the impacts of climate change

FNDC's Climate Road Map identifies four streams of action on climate -



⁷ FNDC (2020) *Climate Change Road Map*, <https://www.fndc.govt.nz/Your-district/Climate-Action/Climate-Change-Roadmap>

PDP-wide matter: General approach

We seek:

- ❖ Clear, unambiguous objectives, policies, etc.
- ❖ Much less reliance on discretionary activity status
- ❖ Clear, unambiguous Assessment Criteria
- ❖ In cases where provisions in different PDP sections are not fully aligned, the more stringent provision should apply

Justification:

- Current PDP approach leads to inconsistent decisions on consent applications, and uneven implementation of provisions:
 - PDP relies too much on 'discretionary' status
 - Some objectives/policies in chapters are ambiguous; can be interpreted in diverse ways
 - PDP chapters provide very few Assessment Criteria
- These problems are exacerbated because FNDC has a relatively high staff turnover and institutional knowledge may not be retained

General matter: Public & limited notification

- ❖ We strongly oppose a proposal to exclude restricted discretionary activities from limited or public notification (Kainga Ora S561.003)

Justification:

- Kainga Ora's request appears to contravene RMA provisions for notification.
- KO also seeks to change some discretionary activities to restricted discretionary – this would remove notification from an even larger number of provisions
- Public consultation and input on resource consenting matters is already insufficient at present

PLACEHOLDERS FOR NEW SECTIONS IN THE PDP

We seek placeholders for several matters that do not seem to be covered by future Hearings -

We seek placeholders for additional matters in the PDP –

- ❖ We seek placeholders for new plans that have a spatial component and are currently under development (e.g. Kerikeri-Waipapa Spatial Plan) or may be developed for other towns or sub-district areas in coming years. This includes spatial plans, structure plans, growth area plans, active transport network plans, masterplans, urban design protocols or similar planning documents that are relevant to PDP provisions
- ❖ We seek placeholders for new special zones (or similar) to cover significant new development areas – e.g. re-zoning for the development of the Brownlie property and Bing property to enable residential and mixed use zones, precincts, open space and natural open space zones for public greenways and cycleways, etc.

Justification:

- To provide improved and consistent planning outcomes, spatial plans and other plans that are relevant to PDP provisions and spatial planning should be incorporated into the PDP (by suitable mechanism, as appropriate e.g. incorporated by reference or as development area or via plan change/variation etc.)
- For efficiency and transparency, relevant plans need to be included in the online PDP and maps, including overlays where appropriate.
- This would enable developers and the public to look at one single online location to access all relevant planning materials associated with the district plan.
- Various submitters have requested place-holders in the PDP for additional planning documents such as spatial plans, masterplans etc, e.g. Kapiro Conservation Trust (446.001), Our Kerikeri Community Trust (s271.001), Vision Kerikeri (s524.001), Carbon Neutral Trust (s529.066).

We seek a placeholder for a new section in the PDP –

❖ PDP section specifying comprehensive requirements for Financial Contributions

- The full burden of cost for FNDC infrastructure linked to new development falls on Council (ratepayers) and/or national government agencies (taxpayers) because FNDC generally ceased collecting the following types of contributions from developers:
 - FNDC eliminated the requirement for LGA Development Contributions about a decade ago
 - Operative district plan (chapter 14)⁸ specifies Financial Contributions only for esplanade and car-parking
 - PDP does not require Financial Contributions (aside from esplanade land)

It would be feasible to insert a section on Financial Contributions in the PDP as a variation. For years, community groups have called on FNDC to require Financial Contributions and/or LGA Development Contributions.

- ❖ If the Commissioners hold further discussion with submitters on any Hearing 1 topics, our group would like to be involved.

⁸ FNDC (2009) *Operative District Plan*, chapter 14,
https://www.fndc.govt.nz/data/assets/pdf_file/0025/8683/14.-Financial-contributions.PDF