New Plymouth District Plan - Private Plan Change Request

Wairau Road, Oakura Rezoning

Submission from Climate Justice Taranaki Inc.

August 2018

Introduction

- Climate Justice Taranaki Inc. (CJT)¹ is a community group dedicated to environmental sustainability and social justice. This includes issues of inter-generational equity, notably in relation to climate change, which will impact future generations' inalienable rights to safe water, air and soil, crucial to sustaining livelihoods and quality of life. CJT has been incorporated under the Incorporated Societies Act 1908 since 26th February 2015.
- 2. We welcome the opportunity to submit on the New Plymouth District Plan Private Plan Change PPC18/00048 Request for Wairau Road, Oakura Rezoning.

Overview

- 3. Urban development around cities and rural towns² need to reflect and support government policies and actions that tackle climate change, environmental sustainability, housing need, social inclusiveness and build on Māori knowledge and values notably kaitiakitanga (guardianship and conservation), ki uta ki tai (interconnected resources and ecosystems)³ and mauri (life force)⁴. The 'grow now, pay later' model⁵ is neither sustainable nor responsible.
- 4. The private plan change request, as it is, does not promote the sustainable management of natural and physical resources, and therefore fails to meet the purpose of the Resource Management Act 1991 (RMA). It reflects no desire or innovation for climate action, environmental sustainability, social inclusiveness or Māori values.

Amendment 1 Policy 23.8 and Amendment 2 Policy 23.9

- 5. The plan change request does not provide comprehensive assessment of the carrying capacity of the resources required to support its development. These include the added demand and pressure on water supply, stormwater management, sewerage treatment, traffic and transportation, as well as threats to local amenity values, water quality and indigenous biodiversity (from pests and weeds) considering the close proximity of the site to the national park.
- 6. There is no clear evidence of how the wide range of impacts from the site development would be avoided, minimised, mitigated or managed. The local population is projected to more than double, adding some 1,065 people in the proposed 59ha site and another 1,200 in the 48ha Future Urban Development (FUD) area on the other side of SH45.
- 7. The request does not provide alternative site or development strategy to justify the viability, effectiveness or efficiency of what's proposed.
- 8. There is no clear economic assessment on the cost burden on NZTA, Council and other rate payers, from the range of infrastructural spending required to support the development. We question why the public is expected to fund such a profit-making business venture when there are more pressing needs for public funding.

9. Considering the 20-40 year time-scale of the proposed development, we ask how the requested plan change fits in the Long-term Plan and Infrastructure Strategy that Council recently adopted in June, and with the current District Plan Review.

Amendment 3 Residential Environment Area and Amendment 4 Rules

- 10. There is inadequate justification for the various rules proposed, notably the significant increase in maximum coverage of a site to 55% and the reduction of lot size to 300m². What would be the loss of productive land, open space and opportunities for community initiatives such as food gardens, communal sheds or outdoor education?
- 11. If new rules are to be introduced, then we urge for rules that ensure and promote sustainability and resilience, notably in the areas of water supply, wastewater treatment, stormwater management, energy efficient homes^{6, 7}, solar water heating, renewable energy generation⁸, smart-grids, public and low carbon transport systems.
- 12. As an example, Kapiti Coast District Council's Plan Change 75 (2011)⁹ requires new residential dwellings to have rainwater tanks and/or greywater irrigation systems, for outdoor uses and toilet flushing; and no outdoor taps can be connected to the municipal water supply. As we explained in our feedback on the draft NP District e-Plan in March 2018¹⁰, such interventions by way of a District Plan Change and/or financial incentives would reduce the demand on Council's water supply as well as building community resilience.

Amendment 5 Rural Environment Area and Amendment 6 Rules

13. We are not convinced of the effectiveness of the proposed Rural Lifestyle Area (catering to the equestrian community) in promoting sustainable management of rural resources. If not properly managed, there are risks of weed infestations, soil erosion and water quality issues associated with such land use located in close proximity to the national park. There are other kinds of land use such as organic, small-scaled, market gardening which would be more sustainable and help build local food resilience, economy and a lower carbon future.

Decision Sought

14. We ask that the private plan change be declined, unless significantly reduced in scope and incorporating real sustainability visions, designs and rules.

¹ <u>https://climatejusticetaranaki.wordpress.com/</u>

² https://www.stuff.co.nz/national/politics/102803694/the-urban-agenda-what-will-new-zealands-new-government-bring-for-towns-and-cities

 $[\]frac{3}{https://www.mfe.govt.nz/publications/fresh-water/fresh-water-report-2017-introduction to-our-fresh-water/ki-uta-ki-tai-\%E2\%80\%93$

⁴ http://ngatokitaiao.maori.nz/te-ara-maori-mo-te-taiao/environmental-monitoring/the-mauri-model/

⁵ https://www.reuters.com/article/us-global-cities-development/grow-now-pay-later-no-longer-an-option-for-worlds-ballooning-cities-experts-idUSKBN1FT2EZ

⁶ https://www.energywise.govt.nz/at-home/building/

⁷ https://www.nzgbc.org.nz/homestar

⁸ https://www.asbec.asn.au/research-items/bottom-line-household-impacts-building-code/

 $^{^9}$ https://www.kapiticoast.govt.nz/contentassets/224584fb884e4d7e9fba8cf055044fb7/21-april/1013-08-kcdc-or-operative-stage-pc75-waterdemand-management-sp-11-191.pdf

¹⁰ https://climatejusticetaranaki.files.wordpress.com/2018/05/cjt-feedback-on-draft-new-plymouth-district-eplan-16mar2018-full.pdf