

AK Taihia

From: Kapiro Conservation Trust <kapiroconservationtrust@gmail.com>
Sent: 20 June 2024 14:30
To: AK Taihia
Cc: VKK; carbonneutraltrust@gmail.com
Subject: Hearing 2 notes
Attachments: Hearing 2 statement VKK CNT KCT 06.2024.pdf

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Hi Alicia-Kate,

We would like to thank the panel for the opportunity to make a presentation at Hearing 2.

Attached, copy of notes on behalf of Vision Kerikeri, Carbon Neutral Trust and Kapiro Conservation Trust.

The panel chair asked if our groups made submissions on the topic of dogs.

Below, a list of our submissions on dogs and kiwi –

- **Vision Kerikeri s527:** s527.014 on pages 7-8; 5th bullet point on page 14; and 2nd & 3rd bullet points on page 23. (Numbers were not allocated to relevant submission points on page 14 and 23).
- **Kapiro Conservation Trust s442:** key submission point on page 7-8; s442.006 on page 14; 2nd & 3rd bullet points on page 23; s442.149, s442.150, s442.151. (Numbers were not allocated to relevant submission points on pages 8 and 23)
- **Carbon Neutral Trust s529:** s529.138; 5th bullet on page 85; and 2nd & 3rd bullets on page 94.

The above submissions stated that they relate to 'All sections of the PDP...':

- Vision Kerikeri: page 1 of s527
- Kapiro Conservation Trust: page 1 of s442
- Carbon Neutral Trust: page 72 of s529.

Quail Ridge special zone is a relevant section of the PDP.

Regards,

Vision Kerikeri, Kapiro Conservation Trust, Carbon Neutral Trust

PDP Hearing 2 - June 2024

Various special purpose zones

Submitters: Vision Kerikeri, Carbon Neutral Trust, Kapiro Conservation Trust

Email: visionkerikeri@gmail.com, carbonneutraltrust@gmail.com,

kapiroconservationtrust@gmail.com

Presenter: Melanie Miller

Our statements in Hearing 1 provided reasons why it is important to put a *climate lens* on all relevant parts of the PDP and additional justification for the points below.

ENERGY EFFICIENCY AND RENEWABLE ELECTRICITY GENERATION

Our submission points on energy efficiency and renewable energy are relevant to Airport, Hospital and special purpose zones in general (and also to later Hearings on other zones etc.)

Our submissions on energy efficiency and renewable energy generation relevant to special purpose zones -

- ❖ **We seek** requirements to consider energy efficient design and relevant types of renewable energy technologies.

Possibly in the form of a requirement that development proposals should demonstrate that they have considered energy efficient design and relevant types of renewable energy technologies – as they are required to do for other matters, such as stormwater management etc.

We note that the PDP policy **MUZ-P6** (Mixed Use Zone) states:

‘Promote energy efficient design and the use of renewable electricity generation in the construction of mixed use development.’

- ❖ A similar policy should be added in special zones (and other zones), such as:
‘Promote energy efficient design and the use of renewable electricity generation in construction of [name of zone] development’

Overall our submissions on energy efficiency and renewable energy seek that –

‘The PDP should include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including ... renewable energy technologies and energy-efficient technologies...’

- submissions by Vision Kerikeri s521.009, s521.015, s521.016, s521.022, s521.023, s521.025; Carbon Neutral Trust s529.055, s529.219, s529.220, s529.227, s529.228; Kapiro Conservation Trust s443.009.¹
- Relevant sections of the PDP (as stated in our submissions): Strategic direction, Renewable Electricity Generation, Subdivision, Zones, Other sections of the PDP

Our submissions seek to update PDP provisions and implement RPS guidelines to adopt energy efficient and renewable energy technologies -

... updating PDP ‘rules/standards in the light of climate change and... improved technologies... For example, standards should preferably require, or at minimum actively encourage, the adoption of *‘sustainable design technologies such as the incorporation of*

¹ FNDC’s PDP submission summaries did not note some submission points in relevant PDP sections.

energy-efficient (including passive solar) design, low-energy street lighting, ... renewable energy technologies' as stated in the RPS.'

- submissions by Vision Kerikeri s521; Carbon Neutral Trust s529; Kapiro Conservation Trust s443.
- Relevant sections of the PDP (as stated in our submissions): Strategic direction, Renewable Electricity Generation, Subdivision, Zones, Other sections of the PDP

The PDP chapter on Renewable Electricity Generation (REG) sets rules for developers and others who wish to install REG. However, it is desirable also to include provisions in zone chapters to ensure that energy efficiency and renewable energy generation will be considered in all new developments (not just buried in a REG chapter that developers may not consider).

Justification stated in our submissions (s443, s521, s529):

- **RMA s7** requires councils to have particular regard to: energy efficiency, the effects of climate change, and benefits from the use and development of renewable energy, as follows:-
 - 'In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to - ...*
 - (ba) the **efficiency of the end use of energy** ...*
 - (i) The effects of climate change*
 - (j) the **benefits to be derived from the use and development of renewable energy.**'*
- District Councils are required to give effect to the Regional Policy Statement (under s75(3) of the RMA). **RPS Regional development guidelines** (Appendix 2) state that:
*'New subdivision, use and development should: ... Adopt, where appropriate, sustainable design technologies such as the incorporation of energy-efficient (including passive solar) design, low-energy street lighting, ... renewable energy technologies ...'*²
- Climate change imperatives – please refer to our submissions at Hearing 1 about putting a climate lens on all relevant parts of the PDP, and our submissions s443, s521, s529.

Further justification:

- When preparing a district plan, **RMA s74(2)** requires councils to **have regard to the national Emissions Reduction Plan**³ - this identifies the following actions (inter alia) which are not obligatory but are necessary for achieving the nationwide emission reduction targets –
 - *'...replace non-renewable resources with renewables everywhere possible.'* (p.20)
 - *'Support emissions reductions and climate resilience via policy, guidelines, direction ... on housing and urban development.'* (p.125)
 - *'Getting the foundations of our planning and infrastructure systems right today will help our towns and cities generate fewer greenhouse gas emissions in the future.'* (p.126)
 - **'Energy:** *The planning system can ... promote low-emissions development – residential, commercial, industrial and infrastructure – that reduce energy demand. When we use less energy, we can delay the need for new electricity infrastructure.'* (p.130)
 - *'To transition our electricity system to 2050, we need to ... accelerate development of new renewable electricity generation across the economy, ...'* (p.211)

² NRC, *Regional Policy Statement*, p.163, Appendix 2, Part A, clause (p).

³ *First Emissions Reduction Plan* <https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/emissions-reductions/erp/>

- ‘Support renewable and affordable energy in communities,...’ (p.212)
- **NPS for Renewable Electricity Generation** (Policy F) states that –
‘district plans shall include objectives, policies, and methods (including rules within plans) to provide for the development, operation, maintenance and upgrading of small and community-scale distributed renewable electricity generation from any renewable energy source to the extent applicable to the region or district.’
- PDP Mixed Use zone policy MUZ-P6 states that –
‘Promote energy efficient design and the use of renewable electricity generation in the construction of mixed use development.’ This policy should be added in all zone chapters.

IMPERMEABLE SURFACE COVERAGE AND STORMWATER RUNOFF

Our submissions on impermeable and permeable surfaces are relevant to special purpose zones in general (and also later Hearings on other zones etc.)

Our submissions on impermeable surfaces relevant to special purpose zones -

- ❖ We seek provisions to minimise impermeable surface areas by requiring permeable materials wherever feasible for surfaces such as driveways, paving, etc.
- ❖ We also support the original submission by Puketotara Lodge (related to s481.011) which seeks improved provisions to control stormwater runoff

Overall, our submissions on impermeable surfaces seek to -

Amend the PDP to ‘include objectives, policies and rules/standards that require best practice environmentally sustainable techniques for new developments, including... permeable materials wherever feasible for surfaces such as driveways, paths etc.’
‘Developments should use permeable materials wherever feasible for surfaces such as driveways, paths.’

- submissions by Vision Kerikeri s521.009, s521.015, s521.016, s521.022, s521.023, s521.024, s521.025; Carbon Neutral Trust s529.055, s529.219, s529.220, s529.227, s529.228, s529.229; Kapiro Conservation Trust s443.009⁴
- Relevant sections of the PDP (as stated in our submissions): Strategic Direction, Natural hazards, Subdivision, Zones, Other relevant sections of the PDP.

Our submissions seek -

‘greater [more restrictive] limits on impermeable areas, and/or requirements for minimum permeable areas, for subdivision, use and development. In urban/residential zones... adopt measures to limit the cumulative total impermeable surface and/or protect a specified cumulative total permeable area.

- submissions by Vision Kerikeri s521.008, s521.013; Carbon Neutral Trust s529.054, s529.217; Kapiro Conservation Trust s443.008⁴
- Specific sections of the PDP (as stated in our submissions): Strategic Direction, Natural hazards, Subdivision, Zones, Other relevant sections of the PDP.

⁴ FNDC’s PDP submission summaries did not note some submission points in relevant PDP sections.

Justification noted in our submissions (s443, s521, s529):

- PDP provisions should require measures to prevent problems associated with more extreme rainfall events in future:
 - **Flood risk:** If the majority of land in residential/urban areas becomes covered by impermeable surfaces, it would eliminate much of the existing soakaway area for stormwater and increase the risk of flooding in residential/urban areas during high rainfall events.
 - **Water quality:** Large impermeable surface area would increase urban runoff to waterways during heavy rain... leading to adverse effects on water quality due to sediment and pollutants in runoff
- 'PDP should address the fact that intensification can result in much larger impermeable surfaces covering a very high percentage of the urban land with houses, garages, other buildings, driveways, paving, tarmac, concrete etc.'
- 'Increases in impervious surfaces will impact on stormwater flows, how stormwater affects the water bodies it is discharged to.'
- 'The PDP should require best practice... and measures for all stormwater... engineering, infrastructure and related development, to prevent problems associated with more extreme rainfall events in future' - submissions Vision Kerikeri s521.007, Carbon Neutral Trust s529.053, Kapiro Conservation Trust s443.007.

Further justification:

- Flooding is New Zealand's most frequent natural hazard. The economic cost of flood damage is expected to continue rising substantially due to climate change and urban expansion.
- According to the Insurance Council of New Zealand, flooding exacerbated by climate change in 2023 will cost about \$3.5 billion.⁵
- A US study⁶ compared increases in total impermeable area, stormwater runoff and pollutant concentrations as development progressed in a conventional development vs. a development that used low impact techniques. They found that runoff from impermeable surfaces in developed areas is a major cause of degradation to freshwater bodies and estuaries -
 - **Conventional subdivision design:** A large increase in runoff volume was observed as total impervious area increased through development of a conventional subdivision. Runoff coefficients also increased. These relationships were non-linear, indicating that as imperviousness increases, annual stormwater runoff volume increases exponentially. Significant increases in stormwater runoff and pollutants were found in the conventional subdivision. Pollutant export regressions were similar to runoff regressions, indicating that the flow increase in the conventional subdivision was the primary driver behind pollutant export increases.
 - **Low impact subdivision design:** In contrast, annual stormwater runoff volume in the subdivision did not change as watershed impervious coverage increased to a limited extent. This lack of change in flow with increased impervious area is attributed to the LID stormwater management techniques used throughout. runoff and pollution levels remained unchanged from pre-development levels in the subdivision that used low impact techniques.

⁵ <https://www.icnz.org.nz/industry/media-releases/2023-climate-disaster-payouts-top-2-billion/>

⁶ Dietz ME & Clausen JC (2008) Stormwater runoff and export changes with development in a traditional and low impact subdivision. Journal of Environmental Management 87 (2008) 560–566

Key role of territorial authorities:

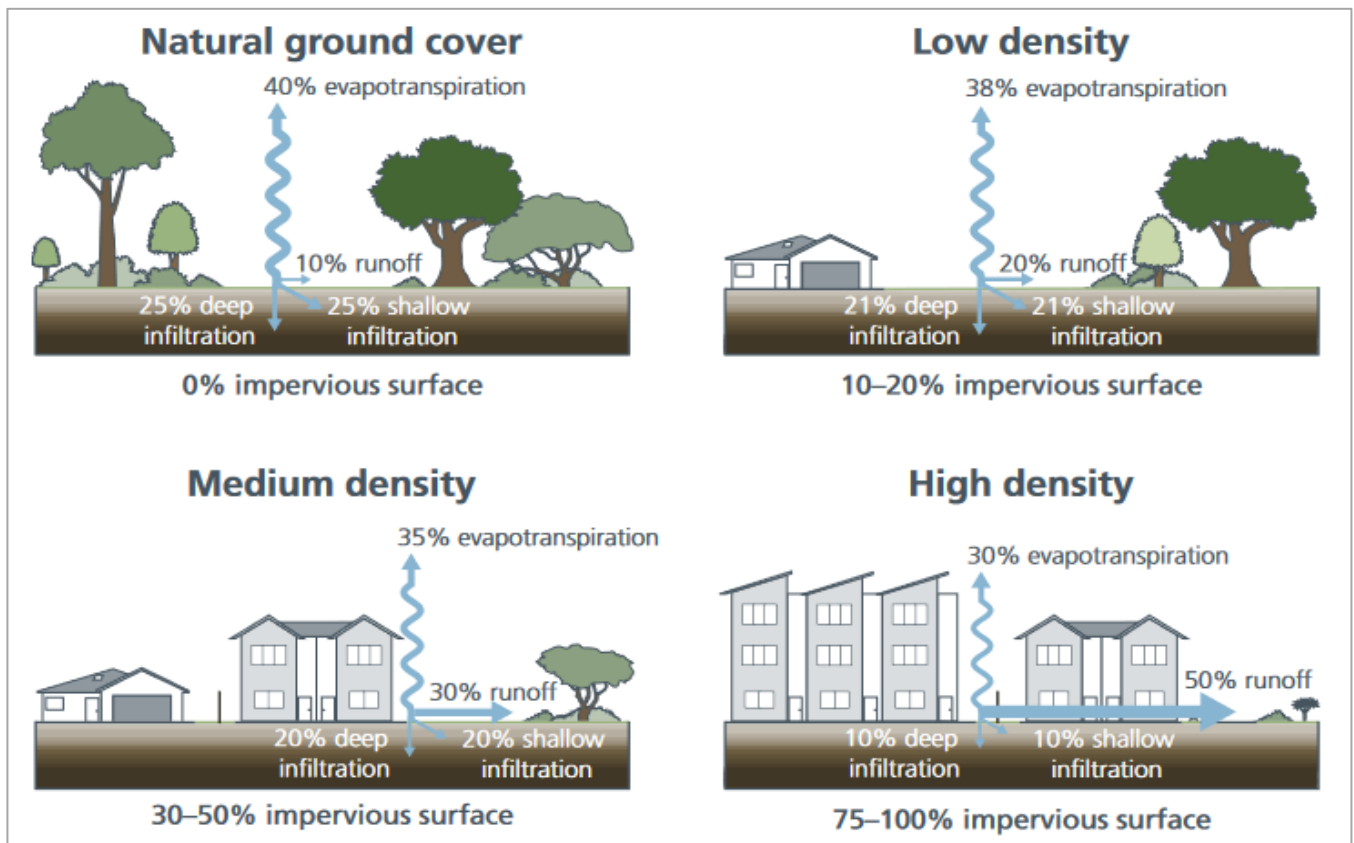
A report for Auckland Council in 2009⁷ noted that implementation of low-impact design in the Auckland region had progressed at a slow rate, and gave three main reasons – which included ‘**lack of support and promotion by a number of territorial authorities**’.

The PDP provisions will establish policies/rules for the next 10+ years for developments that will last for the next 50 years or much longer. Climate-matters such as energy efficiency, renewable energy generation, stormwater impacts due to impermeable coverage etc. need to be addressed in all relevant parts of the current PDP - in order to mitigate and reduce the future huge social costs of climate change. A new approach is needed now, at this stage. Our communities cannot afford the social cost of postponing climate-related provisions till the next district plan is drafted in 10+ years’ time.

Fig. Percentage impermeable surface and related % runoff, infiltration and evapotranspiration

Diagram from a report by Parliamentary Commissioner for the Environment (2023)⁸ notes that -

- 10-20% impermeable surface leads to about 20% runoff
- 75-100% impermeable surface leads to at least 50% runoff



⁷ Shaver E (2009) Low impact design versus conventional development: literature review of developer-related costs and profit margins. Prepared for Auckland Council, <http://www.aucklandcity.govt.nz/council/documents/technicalpublications/tr2009-045%20-%20low%20impact%20design%20vs%20conventional%20development.pdf>

⁸ PCE (2023) *Are we building harder hotter cities? Vital importance of urban green spaces.* <https://pce.parliament.nz/media/tetah53z/report-are-we-building-harder-hotter-cities-the-vital-importance-of-urban-green-spaces.pdf>

PET PROVISIONS AND PROTECTION OF INDIGENOUS BIODIVERSITY

Our submissions on ecosystems and indigenous biodiversity (s527, s529, s442) address all relevant sections of the PDP

Our submissions relevant to Quail Ridge special purpose zone -

- ❖ The PDP should include appropriate provisions to protect vulnerable indigenous biodiversity; accordingly we support s42 report recommendation that rule QR-R9 should be retained as notified.

Justifications include the following:

- RMA s6 matters of national importance require councils to recognise and provide for the protection of significant habitats of indigenous fauna.
- Most of the Quail Ridge property boundary is surrounded by DOC land (Conservation Zone) that comprises mature native bush and kiwi habitat, and DOC does not allow dogs there.
- Retired people who want to keep dogs have alternative options. For example, there are about five other retirement developments in Kerikeri that are not located in known kiwi habitat and therefore do not have dog restrictions related to kiwi.
- Although about 50% of households own dogs, the other 50% (or so) do not own dogs, and PDP rules should also have regard to their options. For example, some people strongly prefer the option of living in a neighbourhood that actively protects kiwi, or prefer to live in a neighbourhood that doesn't have dogs barking or roaming dogs, where they can walk without getting dog excrement on their shoes etc.