

Carbon Neutral NZ Trust - Inge Bremer, Trustee and Treasurer  
Proposed District Plan Hearing 1  
Strategic Direction, Tangata Whenua, and Miscellaneous Topics  
Tuesday 28 May 2024

Kia ora koutou, Commissioners Robert Scott, Alan Watson, Felicity Foy, Hilda Halkyard-Harawira, and Siani Walker.

### **About Carbon Neutral Trust (CNT)**

The charitable Carbon Neutral NZ Trust initiative began in 2018. Our mission is to raise awareness about climate change and provide tools for individuals, households, small entities and council administrations to measure and reduce their carbon footprints. We have developed a carbon calculator which is featured on the Northland Regional Council's website and has been utilized by thousands of participants. We are in contact with leading scientists such as Professor James Renwick from the Climate Change Commission and Nobel prize laureate David Lowe, ensuring our strategies are grounded in science.

We have already engaged with the district council's planning processes, making numerous submissions to ensure climate change considerations are integrated into council policies and the district plan. Our goal is to help formulate a district plan that consistently incorporates climate change issues in all policies and decisions. This is essential for preserving and enhancing the wellbeing and prosperity of our district's residents in the face of increasing climate change. Violent weather fluctuations in Aotearoa and around the world remind us almost daily of the increasing urgency.

### **Request for Climate Lens on PDP**

To effectively address climate change, the PDP must include improved clear, strong rules without so much discretionary leeway. Currently, the plan lacks sufficient provisions to manage the adverse effects of climate change and does not fully implement the precautionary approach from the Regional Policy Statement (policy 6.1.2) (\*1).

Examples of specific areas needing further attention in the PDP:

- Impermeable Areas: Minimise the extent of impermeable surfaces to reduce stormwater hazards and require permeable surfaces wherever feasible.
- Conserving Water: Mandate rainwater harvesting tanks in new developments connected to reticulated water supply to help conserve water resources.
- Active Transport: Require new development areas to provide networks of safe (off-road) cycleways and walkways for diverse benefits.
- Sea Level Rise: Additional guidelines to manage risks associated with rising sea levels.

PDP rules should be easily interpretable for developers, council staff, and private citizens, and ideally compatible with AI technologies for better and faster decision making.

### **Supporting Evidence for applying the Climate Lens to the PDP:**

s7(i) of the RMA requires councils to have particular regard to the effects of climate change when managing the use, development and protection of natural/physical resources.

When preparing or changing a district plan, the RMA specifically requires councils to have regard to the National Emissions Reduction Plan and National Adaptation Plan made under the Climate Response Act (RMA s74(2)). Those plans identify a number of relevant areas where local government makes decisions, such as planning and compact urban form, local infrastructure, active transport, renewable energy, and flood hazard management.

Wherever feasible, it is important that the PDP should include policies/rules that will reduce greenhouse gas emissions related to the activities that can be covered by a district plan.

Addressing climate change issues cannot be set aside until the next (!) district plan in ten years time (i.e. 2035 ++).

- IPCC Report: Recent findings from the IPCC emphasizes the dire consequences and substantial future costs of current **inaction** on climate change (\*2)
- The Climate Change Commission has pointed out that Local Government plays a key role in achieving essential remission reduction targets.
- The Climate Change Commission: Aligns with the IPCC in highlighting the urgent need for decisive action (\*3)

### **PDP should implement council policies relevant to climate:**

PDP provisions should be updated to implement Council policies and statements related to climate.

For example:

- FNDC Long Term Plan 2021-31 identifies the importance of coordinating efforts to reduce our carbon footprint and integrate climate change into planning and decision-making (\*4)
- FNDC Long Term Plan 2021-31 also identifies climate change as the number one risk facing the region
- Far North 2100 states that Council has a goal to support businesses and communities of the Far North towards a carbon zero 2050, with gradual reductions through the years

FNDC's Climate Road Map (\*5) sets out guiding principles:

- it recognizes the need to act now and stipulates that

- “we will make climate change risks a key consideration in all our planning”. Merely providing an extra column in decision making tables is not enough.
- Our plans will incorporate carbon emission reduction policies, in line with government’s GHG reduction plan (p.6)

### **FNDC’s Climate Change Road Map: Vision and Climate Change Objectives**

A key table in FNDC’s Climate Road Map summarises the Road Map’s alignment to the District’s vision in 9 categories of expectations with the objectives of -

- reducing council’s greenhouse gas emissions to net zero,
- supporting our communities towards carbon zero by 2050
- managing our resources and assets to best future-proof them from the risks of climate change
- helping our communities prepare for and adapt to the impact of climate change.

### **Strengthening the PDP Strategic Directions:**

**Social Prosperity SD-SP-01** “community wellbeing is heightened by a sense of place, belonging, connection to the environment and inclusiveness”.

- We strongly support s42 recommendation to add: belonging, connection to the environment and inclusiveness, as clarification to assist plan users in understanding what makes a sense of place.
- We oppose the s42 recommendation to delete ‘place’.
- We seek to retain place in SD-SP-01.

Justification:

The Strategic Direction says it’s strategy is based on Far North 2100 (\*6). This document states that Community wellbeing is bolstered by a sense of place and purpose, and 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).

**Economic Prosperity SD-EP-04** “People, businesses and places are connected digitally and through integrated transport networks”.

- We strongly support s42 recommendation to add: that is safe, efficient and sustainable.
- We oppose S42 recommendation to reject ‘multi-modal’.

- We seek: integrated multi-modal transport network that is safe, efficient and sustainable, and enables active transport.

Justification:

- Active transport benefits physical health and wellbeing, reduces emissions and traffic congestion, and provides low-cost transport option for users, as well as jobs for related repair & maintenance. It also enhances a wellbeing feeling within urban areas, and can reduce car movements and parking issues.
- *Far North 2100* supports multi-modal networks for walking, cycling and alternative modes of transportation (page 20)
- Regional Policy Statement guidelines on connectivity: "places a high priority on walking, cycling, and where relevant, public transport" (RPS, page 165, Appendix 2, Part B Regional urban design guidelines)
- Examples of submissions that support multi-modal or active transport include Vision Kerikeri, Our Kerikeri Trust, Kapiro Conservation Trust, and Carbon Neutral NZ Trust stating that -
  - we seek PDP provisions that will support active modes of transport, including pedestrians, cyclists...(e.g. S521, p.3)
  - the PDP needs revised/additional policies and rules to ensure that active transport modes will be supported in practice when consents are assessed/granted. For example, the PDP should require subdivisions and developments to provide cycleways and pedestrian walkways (e.g. S521, p.3)
  - PDP should promote and support active transport and multi-model integrated transport (e.g. S521.004)

Active transport and/or multi-modal transport networks are also supported by others such as Public Health Northland (S516.040), Ministry of Education (S331.030), Kiwi Fresh (S554), Twin Coast Cycle Trail (S425.008)

**Urban Form SD-UFD-03** "Adequate development infrastructure is in place or planned to meet anticipated demands for housing and business activities"

- We support s42 recommendation to add: and additional infrastructure.
- We seek to add: infrastructure is in place or planned and funded to meet the anticipated demands...

Justification:

- In cases where developers are not responsible for providing such infrastructure it needs to be further advanced/engineered to be carried out, not merely 'planned' on paper.
- In particular, appropriate funding needs to be secured and identified in Council LTPs or committed by government or other sources.

- Many other councils collect Financial Contributions (under RMA) and/or Development Contributions (under LGA) to contribute to infrastructure and reduce the burden on ratepayers
- However FNDC has taken a different, inappropriate approach:
  - FNDC does not require development contributions, although community groups have pressed council for years to require contributions
  - PDP does not require financial contributions (other than esplanade land)

### Natural Environment

**SD-NE-01:** “A culture of stewardship in the community that increases the district’s biodiversity and environmental sustainability.”

**SD-NE-03:** “Active management of ecosystems to protect, maintain and increase indigenous biodiversity for future generations”.

- SD-NE-01: for clarification we seek to add: indigenous biodiversity
- SD-NE-03: we seek to add intrinsic values: ‘...to protect intrinsic values and maintain and increase..’

Justification:

- It is important to recognize the intrinsic values of the natural environment with it’s whakapapa.
- S42 report General Matters recognized the concept of intrinsic values and suggested addressing it in other chapters, however it is a significant overarching concept that should be included in Strategic Direction.

**Natural Environment SD-NE-04:** “land use practices mitigate climate change by enabling carbon storage and reducing carbon emissions”.

- We seek to replace ‘carbon emissions’ with ‘ greenhouse gas emissions’ throughout the PDP

Justification:

FNDC’s Climate Action Policy (adopted 2023):

- Policy refer to ‘actions to mitigate greenhouse gas emissions..’(p.1)
- Definition: ‘Emissions reduction – means reducing greenhouse gas emissions’ (p.8)

The term ‘greenhouse gas’ is used in several PDP provisions, as follows - PDP Renewable Energy Generation chapter:

- Overview ‘ helping communities move towards more self-sufficiency, contributing to reductions in greenhouse gas emissions..’
- REG-02: Renewable electricity generation activities: ‘contribute to the reduction in greenhouse gas emissions..’

PDP Transport chapter:

- TRANS-06: 'supports urban environments designed to reduce greenhouse gas emissions'
- TRAN-P2: '(d) supports reductions of greenhouse gases from vehicle movements'

**Natural Environment SD-NE-05:** "The natural character of the coastal environment and outstanding natural features and landscapes are managed to ensure their longterm protection for future generations".

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

Justification:

- To align with RMA s6 matters – include water bodies and their margins should be added
- A number of submitters have noted the need for greater protection of water in matters that are covered by the district plan.

**Revisiting Strategic Direction Text:**

- We recommend including the Strategic Direction section among matters that should be revisited to check for consistency etc after all PDP chapters have been heard

Justification:

- Hearings on other chapters may identify significant matters that need to be included or addressed in Strategic Direction
- Revisiting Strategic Direction text will give an opportunity to ensure a coherent and consistent approach with all other PDP chapters

**PDP-wide matters and general principles:**

Current PDP approach will lead to inconsistent decisions on consent applications, and uneven implementation of provisions:

- Some objectives/policies in chapters are ambiguous. They can be interpreted in diverse ways
- PDP relies far too much on "discretionary" status
- PDP chapters provide very few Assessment Criteria
- These problems are exacerbated because FNDC has a relatively high staff turnover, so institutional knowledge disappears

We seek a PDP with

- clear, unambiguous objectives and policies
- much less reliance on discretionary status
- clear, unambiguous assessment criteria

**Placeholders**

We seek placeholders in the PDP for

- Active transport network plans, and spatial plans, masterplans, placemaking plan, urban design protocols and/or equivalent planning documents – for specific communities or areas
- Special zones (or similar) to cover significant new development areas, e.g. for the Brownlie property, which is proposed for re-zoning
- Comprehensive requirements for Financial Contributions
- in cases where policies or rules in different chapters are not well aligned, the more stringent rule should apply (S511.018, S442.038)
- we strongly oppose Kainga Ora's request to exclude restricted discretionary activities from limited or public notification (S561.003)

We intend to raise other matters in relevant PDP chapters.

The Far North District has the potential to become a model of climate adaptation and sustainability, but only if we act now. We need to ensure that the PDP includes appropriate mechanisms – for the coming 10 years of the plan at least – to manage and prepare the community and infrastructure for the following decades and ensure future wellbeing. It must be inviting for investors, but giving them very clear rules so that everything can fall into the right place.

#### Characteristics of a Good District Plan:

1. Clear Specifications
2. Long-Term Vision:
  - Provisions for sustainable development with an emphasis on environmental preservation
  - Plans that encourage green spaces, renewable energy, and enable active transport options.
3. Adaptability to Climate Change
  - Policies for addressing hazards arising from impacts of climate change, such as avoiding new building and infrastructure in vulnerable areas.
  - Infrastructure improvements (with funding) to withstand extreme weather events
4. Growth Management:
  - Strategies to accommodate an increasing population without compromising quality of life
  - Affordable housing policies (with view to funding) and amenities to support diverse community
5. Regulated Development:
  - Strict provisions to prevent inappropriate developments
  - Ensuring developments benefit the community and our natural environment in the long term.

#### Characteristics of a Detrimental District Plan:

1. Discretionary Decision-Making:
  - Vague or ambiguous provisions that leave too much room for interpretation by council staff or developers
  - Increased likelihood of legal challenges due to ambiguous provisions.
2. Short-term Exploitative Investments:
  - Allowing development in inappropriate locations, further urban sprawl and loss of productive land and loss of the beneficial with sequestration properties of that land
  - Insufficient protection of the natural environment, leading to continued degradation of natural resources, the whenua, the awa, and the taiao
3. Neglect of Vulnerable Populations:
  - Insufficient support for the provision of affordable housing by new developments
  - Insufficient planning for multi-modal transportation

The MacKenzie District Council's spatial planning process is a good example: it provides a 30 year vision for the towns of Fairlie, Tekapo and Twizel. It focuses on sustainable development, maintaining the character of the townships, and ensuring that growth benefits the local community. It's recent updates (June 2023) show this:

<https://www.mackenzie.govt.nz/council/strategies-plans-and-reports/strategies/district-plan-review>

In contrast, the Thames Coromandel District's approach has faced criticism for several reasons, some of which include:

1. Discretionary Decision Making: the plan has been criticised for allowing too much discretion in decision making by council staff, leading to inconsistencies and potential biases in approvals
2. Environmental Concerns: The plan's approach to mining and land use has raised environmental concerns. While certain types of quarrying and mining are acknowledged as necessary, the balance between development and environmental protection has been contentious and poorly managed.
3. Short-Term focus: Some aspects of the plan are seen as prioritizing short-term economic gains over long term sustainability, which can lead to environmental degradation and social issues.

Conclusion:

Hei katinga, ka tohe matou ki te kaunihera ki te tango i te tirohanga matawhānui o te rangi puta noa i gna wahanga katoa o te PDP.

In closing we urge the council to adopt a comprehensive climate lens across all relevant parts of the PDP. This will not only mitigate the risks of climate change, but also ensure the long-term wellbeing and prosperity of our district's



residents. We are confident that a well-defined PDP can provide the planning security needed for a sustainable development and resilience against future climate challenges.

Ka mihi ki a koe mo to aro me to kaha kaha ki tenei wāhanga tino nui. Kei te tumanako matou ki te mahi tahi atu ki te whakatukituki i a mātou whaingā. Thank you for your attention and continued efforts in this critical area. We look forward to collaborating further to achieve our shared goals.

#### Source documents:

- (\*1) NRC *Regional Policy Statement*, updated 2018, <https://www.nrc.govt.nz/resource-library-summary/plans-and-policies/regional-policy-statement/regional-policy-statement/>
- (\*2) IPCC Report <https://www.ipcc.ch/report/ar6/syr/>
- (\*3) Climate Change Commission <https://www.climatecommission.govt.nz/our-work/advice-to-government-topic/iniaia-tonu-nei-a-low-emissions-future-for-aotearoa/>
- (\*4) FNDC Long Term Plan <https://www.fndc.govt.nz/your-council/plans-and-reports/plans/Long-Term-Plan-2021-31>
- (\*5) FNDC *Climate Change Roadmap*, 2020, <https://www.fndc.govt.nz/Your-district/Climate-change-in-the-Far-North/Climate-Change-Roadmap>
- (6\*) Far North 2100 district strategy <https://www.fndc.govt.nz/Your-Council/Policies-bylaws-and-strategies/strategies/far-north-2100>