

RUSSELL PROTECTION SOCIETY (INC)

P O Box 154
Russell, Bay of Islands

SUBMISSION ON 2006/20016 DRAFT ANNUAL PLAN AND LTCCP

REPRESENTING 65 INDIVIDUALS & FAMILIES

COMMUNITY BOARD: EASTERN WARD

WE WISH TO BE HEARD IN SUPPORT OF THIS SUBMISSION.

PAGES: 7

DATE: 19 April 2006

General Comments

In our view the LTTCP submission process could be substantially improved. Information in the five volumes that have been prepared is initially hard to find and is often repetitive, leaving a lot of details buried and easy to overlook. Ratepayers have been given just a month to respond to these documents and the complex issues contained therein. It is a difficult task and as a result the public will be discouraged from responding in a meaningful way.

The CD mailed to Community Groups could have easily included all five volumes. The absence of Volumes 2-4 have made the process even more complicated and time consuming. In the future we hope that the whole LTTCP consultation process can be made simpler and easier. We are happy to assist Council in this regard.

We question the appropriateness of introducing additional rate increases by way of check box options on page 86. These items should be included in the draft plan and budget with full explanations why the Council has not been taken an active role in the matters listed already as most ratepayers would expect.

There is an important matter of principle that has been raised through Council's draft LTCCP. Council appears to be fixated on the issue of economic growth at any cost, irrespective of the effects that this has on the environment, existing amenities and the current overburdened infrastructure within the District. The primary vehicles for determining the important future growth of parts of the District are the Resource Management Act and the Council's District Plan. These embody appropriate processes and safeguards. Our Society has invested a considerable amount of resources in order to ensure the District Plan is appropriate for the historic Russell Peninsula.

It now appears that Council is attempting to bypass these safeguards by formulating “Infrastructure Study Plans” for parts of its District through the LTCCP, which envisage a form and scale of development that has not been contemplated through the District Plan review. We note that this Review has not even been completed yet. It seems that Council is contemplating the provision of expensive infrastructure such as community water supplies, sewerage systems and bridging as a way of further promoting development in selected areas, irrespective of what constraints may be embodied in the reviewed District Plan. The proposal in the LTCCP to intensify Russell Peninsula by encouraging subdivision and development from Okiato all the way to the Township is an obvious example of this.

Our Society questions the Council’s rationale behind essentially promoting unplanned growth in the District, since the costs of this must be borne by the ratepayers in terms of funding expensive and inefficient services that must be provided as a result. There are other costs as well in terms of a degraded environment, a loss of scenic, historic and social amenity, and an infrastructure of roading, power, public toilets, parking and other services that cannot cope. These matters are important to our tourist industry. In our view, the levies and fees Council proposes to recover from developers of these often ill considered and inefficient projects will not begin to fully cover all of these costs. This leaves the ratepayers to shoulder that burden.

The draft LTCCP highlights an associated issue and that relates to efficient and transparent expenditure of Ratepayer’s money. The Council is well aware of Russell Community concerns about the waste of funds that has been evident in the provision of services for the town and the peninsula, especially in relation to the sewerage scheme. The LTCCP appears to reflect a belief on behalf of Council that if it can only increase its rating base and the levies that it collects from developers through continued unplanned growth, then its poor performance as a District will be resolved. In our experience, it is more likely that this ill-considered growth will only lead to further problems because the LTCCP has not demonstrated that Council is able to spend the extra revenue collected in an efficient and effective manner. In this regard, we consider the LTCCP to be a recipe for failure because it is based upon a mistaken premise that all growth is good and that getting bigger rather than smarter is the answer to the District’s (and Ratepayers) financial woes.

We would, instead, invite Council to honour its reviewed district plan and to desist from undermining 10 years of work and millions of dollars by introducing intensification via the LTCCP. District Plan provisions and maps are the appropriate vehicle for planning wise growth. The key point here is that the LTCCP process, involving complex and confusing documents, only four weeks for written submission making, and roughly ten minutes for verbal presentations, does not provide a mandate for Council to pursue its ill-considered intensification proposals.

Specific Issues

- The Society opposes the imposition of a **public good sewerage charge**. Owners of sewered properties already pay an adequate sewerage charge and unsewered properties will now be required to maintain their septic tank systems to a Council

imposed standard. On that basis the “public good sewerage charge” is now considered redundant. [Summary Page 16]

- We support a plan variation to **include height restrictions** in all commercial zones across the district, including a discretionary height rule. The existing lack of height restrictions is yet another example of Council’s confused thinking in trying to provide for uncontrolled development in a way that could destroy the existing amenity of local communities and harm our valuable tourism industry. This variation is long overdue. The “GE Free Northland” policy is supported as an important component of Far North economic development. Therefore Council policy should be tightened to take a stronger approach **to control outdoor use of GE and GM organisms**. We support “GE Free Northland's” submission. [Summary Page 17]
- The Russell Community supports and welcomes the policy change **to abandon the separate sewerage target rate of \$800 yearly for Russell / Tapeka**. However, we oppose the idea of original lots having to pay development contribution as they have been charged the \$800 target rate already for some 10 years now and continue to be charged \$300 sewerage charges for being in an area of benefit. [Summary Page 18]
- Our Society supports and welcomes the initiative for a more balanced **capital value rating** system, subject to full community consultation. This will benefit many coastal property owners in the district currently struggling to pay their rates due high land values. A new rating system could also be based on a combination of capital value and accommodation (living area, no of bathrooms etc). [Summary Page 18]
- The Russell Protection Society supports **Community funding to provide well being**, in such as **Pride of Place funding, Hundertwasser building, internet access in libraries, library services, CAB, Community Halls**. These initiatives build strong communities and enhance our tourist industry, rather than providing for uncontrolled coastal subdivision and development. [Summary page 16]
- Our Society strongly opposes the suggestion that **Russell Peninsula should be intensified** by promoting a continuous ribbon of development from Okiato to Russell Township. This would serve to destroy the essential core values and attractions of the area, upon which the economically valuable tourism industry is based. The historic values of the Peninsula do not simply consist of a small collection of old buildings in the Township; it is the natural setting it provides to a number of nationally important historic events that is critical. Ribbon development is also difficult to efficiently service and would seriously undermine the scenic qualities of the area, as well as polluting the Bay and further compromising the Oyster Farming Industry. This ill-considered proposal is contrary to the policies and provisions contained in the newly reviewed District Plan and serves to illustrate the extent to which Council has lost touch with its local communities. Consistent with the District Plan, we wish to see restricted development that serves to preserve the

unique qualities of existing communities, including their present historic, scenic and social amenity. [Vol 1 Page 16]

- The Russell Protection Society also strongly opposes the **planned provision of expensive infrastructure for Russell Peninsula, including a community water supply, a sewerage pipeline across a bridge, and a bridge linking Opuia with Russell**. Council has never taken the step of discussing these critical developments with the Russell community. If they had bothered to do so, it would have learned that the community has already heavily invested in their own individual water schemes and that these are performing well. If there are specific water quality issues, then these can easily be addressed through the use of readily available treatment systems for individual water supplies. Russell has already invested heavily in a sewerage scheme for the Township and Tapeka Point, and now wants Council to manage and maintain it properly so that this investment is adequately safeguarded. Okiato and Te Wahapu residents have already clearly voted against reticulated sewerage. While it is considered prudent to look at future options for sewage disposal once the life of the existing system has finished, it is by no means certain that an expensive pipeline and commitment to a single sewerage treatment plant in Waitangi Forest is the answer, particularly given the recent history of pipeline breakages and sewage spills. The bridge from Opuia to Russell is an expensive and unwelcome option that would serve to promote wholesale intensification of the Russell Peninsula, thereby destroying its intrinsic qualities at a time when these scenic, historic and social values are being rapidly lost across the rest of the District. The essential point here is that Council simply does not have the mandate from the local community to consider these expensive projects, especially when these pose a direct threat to the values that this community holds so dearly. [Vol 1 Page 16]
- We also oppose the statement **“Paihia development likely to be tourist-driven rather than residential and marked by intensification rather than spread”**. Development is regulated through the District plan and not by marking for intensification in the LTCCP. This is inappropriate and provisions for intensification outside of District Plan zoning rules in this LTCCP draft should be deleted. Please don't undermine the district plan – just use it as it is intended. [Vol 1 Page 16]
- The Society supports full funding for **Okiato-Russell walkway and long overdue upgrade for Russell Sportsgrounds**. The Okiato-Russell track is a priceless addition / attraction for the community and visitors alike. The track along coastal areas, native bush and wetlands is recreational as well as educational and could add another dimension to the tourist attractions of the area.
- The RPS is vitally concerned about the way Council currently **processes resource consent applications**. The community is being disenfranchised because Council arbitrarily decides not to advertise major resource consent applications even though these have a potentially huge effect on the area. Conversely, FNDC appears to require resource consents and voluminous documentation for many minor projects. There is a need to streamline the resource consent processes, but not at the expense

of public participation. The task is how to reform the Council and its officers to make decisions that result in quality outcomes, and which do not lead to community dissatisfaction and prolonged litigation. [Summary Page 27]

- Allied with this is the need for **monitoring to become a key focus**. The lack of effective monitoring, especially of resource consent conditions, is currently a major problem that compromises the District Plan and results in unwanted environmental damage. [Summary Page 27]
- The Society supports **Public Safety Initiatives**, including addressing the effects of climate change in any future planning - especially storm water and flooding issues. **The potentially disastrous effects of releasing Genetically Modified Organisms** in any future planning should be included (refer to “GE Free Northland” submission).
In terms of **Rural Fire**, fire permits issued by Council in the Coastal Living Zone should be treated as in residential zones. Given the current and future intensification in this zone, smoke pollution and fire danger by lighting inappropriately large fires in this Coastal Living Zone on the Russell Peninsula needs to be addressed. We support fire appliance upgrades, civil defence and dog control initiatives. **Initiatives to maintain and upgrade existing sewerage plants are long overdue** and should be Council's priority instead of planning grand new systems that may not be required within the 10 year planning period. **We also support the Social Development Strategy with the goal of maintaining our community's social structures** rather than trying intensify areas in order to grow Council's rating income. [Summary Page 26-29, 49]
- The Society supports some parts of the **Water and Waste Water / Public Health Initiatives** and **opposes other plans such as reticulated water supply** for the Russell Peninsular. Water supply by way of water tanks has been sufficient in the past and there is no need for reticulation other than for supporting inappropriate intensification. **We ask that Council operate and maintain the Russell Sewerage system an accountable and proper manner**. We support all initiatives to solve the now regular pollution events caused by spills from reticulated sewerage systems. This must be Council priority instead of planning grand new projects. The current design standard and management of all existing reticulated sewerage systems in the District gives little or no confidence to build more. Reticulated sewerage systems are expensive to build and run, have a limited life and can cause significant environmental impacts when they malfunction. We suggest that Council develop appropriate policies for on-site disposal systems outside of residential zonings which take advantage of new technologies. Council must get actively involved in educating about septic tank maintenance. In terms of refuse, we would encourage Council to investigate new technologies for replacing landfills in order to achieve sustainability disposal of waste. We particularly support the maximisation of recycling and green waste. [Summary Pages 30, 31, 52]
- The RPS supports initiatives for **Public Transport**, because this is long overdue in Northland. Planning for roading, parking and bridging must be compatible with

expected environmental outcomes in the District Plan and not designed to encourage inappropriate intensification outside District Plan zoning rules. Safe bicycle lanes should be added to future roading plans where practicable and appropriate. Protection and enhancement of roadside vegetation is also necessary in order to safeguard the existing scenic amenity of localities. All transport infrastructure planning must have full community consultation and support. We support Hundertwasser Car Park spending. [Summary Page 35]

- We oppose the **Paihia – Kerikeri link road** because this road does not measurably improve travel times, but is largely intended to open up coastal areas for intensification. [Vol1 Page 10, Summary Page 35]
- The Society opposes any future planning involving **toll roading options**. We believe that the normal sources of national, regional and local sources of funding are adequate for the demonstrated needs of the District. Road toll options would serve to penalise low income people in local communities. [Summary Page 36]
- The Russell Protection Society largely supports most of the statements contained in the **Sustainable Development** and **Culture and Heritage** sections of the LTCCP [Summary Page 52]. However, the Society has a problem in reconciling these statements with many of the Council’s proposals and the recent decisions that it has made. This is particularly the case when looking at Council’s performance in approving coastal subdivisions and developments. For instance, it is stated that Council wants to *“ensure our natural and physical resources are managed in a sustainable way, whilst providing opportunities for our communities to provide for their social, economic and cultural well being and for future generations. The District Plan is the key tool for achieving this..”* [Page 52/3] Further, *“Council will report on the effectiveness of the District Plan, consents and complaints and the state of the Environment as described in Chapter 5 of the Revised Proposed District Plan”*. It states that it will *“Ensure that the shared heritage of the Far North is valued and preserved by: Providing an appropriate mix of incentives (such as the Heritage Assistance Fund and Rates relief and postponement), information and control to make sure that our important places and sites are protected and where possible, restored or enhanced (Chapters 11.5 and 11.5a of the Revised Proposed District Plan)”*. Our Society is sceptical that Council and its officers really understand what these statements mean and what responses are required in this regard. The proposals in the LTCCP to intensify Russell Peninsula are a pertinent example in this respect.
- The Society wishes to raise the issue of **Rating** of east coast properties, particularly on the Russell Peninsula. The land values in this area have risen disproportionately over the last decade and this has been reflected in sky-rocketing rates. Many people who live in these local communities, including Russell, are on low or fixed incomes and the increased rating burden is having a significant effect in changing the fabric of those societies. Families and retired people are being forced out as more affluent holiday home buyers purchase these highly rated properties. The net result is that community services deteriorate and local businesses suffer because there is a lack of a resident population, particularly over the winter months. We ask

that Council investigate the use of differential rating for east coast communities in order to address the problem of high land values. We also ask that Council clearly identify how this rating income is used within our community so that people can be confident that Council's "user pays" policy is being applied openly and fairly.

- We would support and welcome the disestablishment of Far North Holdings Ltd. This is a complex issue and we would be happy to discuss it in detail with the Council when the opportunity arises.

Yours sincerely

Acting Chairperson
Russell Protection Society Ltd