



12th November 2019

To: Commissioner Bill Wasley

Re: Private Plan Change 48 to the New Plymouth District Plan

This submission follows our previous submission (attached as an Appendix) regarding our full opposition to the proposal which is the proposed Private Plan Change 48 to the New Plymouth District Plan requested by Oākura Farm Park Limited (OFP) for the proposed rezoning of land (Lot 29) at Wairau Road, Oākura. Despite the proposed reduction in the number of lots, our opposition remains unchanged. It remains unchanged for all the previous reasons stated and our dissatisfaction with the applicant to still address our specific concerns.

We will not repeat our previous points but will add to them where appropriate. We believe this submission needs to be read in conjunction with our previous submission.

1. Lack of meaningful consultation with Oākura School

Despite our previous statement regarding the lack of meaningful consultation there has still been no engagement with Oākura School. This is very disappointing as a key stakeholder. We note iwi consultation has continued but the school appears to be of no importance to the applicant. For the applicant to refer again to the previous Ministry of Education advice despite our comments and written submission (at the original hearing) shows either the applicant didn't read our submission and/or if not, simply chose to ignore it. For us to be tabled as a member of a 'Liaison Committee' (point 59) ¹ without even discussing this with us is poor and signals the lack of planning and willingness to collaborate.

2. Lack of diligence around key infrastructure and environmental requirements

While this is for other experts to discuss. Failure to talk to us about our infrastructure and environmental requirements (linked to point 1. above) show continued lack of understanding and care.

3. Lack of alignment to existing agreed plans/strategies for managed growth

There was repeated mentions (four times) of our communities 'non-statutory' documents in the statement of further evidence². This was seen as a way, in our opinion to dismiss, minimise and de-value the validity of the town's own planning and consultation. This is disappointing as the success and undertakings in the further evidence provided rely on the community accepting the applicants many 'non-statutory' obligation commitments. Dismissing of the Oakura Community's important (in OFP words 'non-statutory') documents shows just how much emphasis the community can place in the applicants own non-statutory commitments. i.e. None.

Despite the proposed size reduction our initial reasons for allowing growth in the previously designated areas still stand in our view.

¹ STATEMENT OF FURTHER EVIDENCE OF COLIN MICHAEL COMBER ON BEHALF OF OAKURA FARM PARK LIMITED Dated 11 October 2019

² STATEMENT OF FURTHER EVIDENCE OF COLIN MICHAEL COMBER ON BEHALF OF OAKURA FARM PARK LIMITED Dated 11 October 2019



OAKURA SCHOOL



4. Previous breaches of integrity by OFP

Our previous reasons stand here.

In our simplistic view, diagrams provided in the statement of further evidence³ pertaining to the overlay of the previous plan with this revised plan are concerning. They show that this development is about half of what was proposed before. i.e. A Stage 1 and Stage 2. Roads are blunted and not turned into cul de sacs and still pass through the green space indicating it is still actually a 300+ lot proposal. Hardly a well thought out genuine response to the community's wishes.

In addition the lack of a SIA and CIA show that the applicant still believes they are beyond to responding to specific requests other than excuses with regards to the CIA and the total non-compliance to the request for a SIA is poor. For OFP to ask for evidence from other developments is petty and shows the point-scoring approach to this whole process rather than addressing what has been required by the community and in fact the Commissioner.

Summary

Being cynical some might think that this was the plan all along. Go for many sections, then present a significantly reduced plan when that plan was rejected.

At Oākura School we are disappointed that the process allows the hearing to be re-convened given the overwhelming evidence provided in the first instance.

Other than the reduced number of sections, we unfortunately are seeing more of the same; lack of respect to our community's wishes, lack of respect for our previous submission and lack of respect for the commissioners requests. So on that basis our full opposition to the proposal remains unchanged and recorded as against.

Kind regards

Oakura School Board of Trustees

³ STATEMENT OF FURTHER EVIDENCE OF ALAN LEONARD DOY ON BEHALF OF OAKURA FARM PARK LIMITED Dated 11 October 2019

Appendix 1 - Oākura School Board of Trustees Presentation for the Proposed Private Plan Change Hearing

Introduction

My name is Paul Veric, Board of Trustees Representative for Oākura School.

I have spent the majority of my life in Taranaki and have been a resident of Oākura for 7 years. I have two boys who currently attend Oākura School. My most recent (and relevant role) was Headmaster of New Plymouth Boys' High School, a school with over 1300 students.

My name is Lynne Hepworth and I am the Principal of Oākura School. I have been in this role for the past 18 years. I was born in Taranaki and have lived most of my life in New Plymouth. As a child my family holidayed in the Oākura Campground every summer - we were also members of the NPOB Surf Club. In my role as Principal at Oākura School I have had the opportunity to be the New Plymouth Principal Association (NPPA) President and the NPPA representative on the MOE Property Sector Reference Group, the Taranaki representative on the NZEI Principal Council and have been contracted by the MOE to support and mentor principals in Taranaki. I have also been fortunate to be seconded by the Education Review Office to be an ERO reviewer which has given me many opportunities to visit a range of NZ schools. After 18 years in my role as Principal of Oākura School I am totally invested in, and passionate about, providing a quality learning environment for the current and future children of Oākura.

This presentation is delivered on behalf of the full Board of Trustees of Oākura School - the elected body empowered to govern and represent Oākura School. Since 1886 Oākura School has been providing quality education to the community and now has a roll of over 360 students spanning year levels 1-8.

This presentation details our full opposition to the proposal which is the proposed Private Plan Change 48 to the New Plymouth District Plan requested by Oākura Farm Park Limited (OFP) for the proposed rezoning of land (Lot 29) at Wairau Road, Oākura.

The presentation is organised into four key sections:

1. Lack of meaningful consultation with Oākura School
2. Lack of diligence around key infrastructure and environmental requirements
3. Lack of alignment to existing agreed plans/strategies for managed growth
4. Previous breaches of integrity by OFP

1. Lack of meaningful consultation with Oākura School

There are many comments about community engagement and community understanding from OFP throughout the documentation i.e. *'we have listened to, and have a very good understanding of the*

*Oākura community's concerns*¹. This is concerning as Oākura School has only had one meeting on the 17 November 2017 where a proposal was tabled. As a key community stakeholder and a multi-generational representative of the community, it is disappointing to not have been engaged in the proposal at more regular stages by OFP, on the many different aspects of the proposal that affect us.

For OFP to use the following line *'The Ministry of Education is responsible for ensuring communities are provided with sufficient school capacity'*² is disrespectful and shows lack of genuine community duty of care and interest. Given OFP has said they will *'consider a whole of community' approach to the question of rodents, mustelids, cats and dogs..*³, lack of time devoted to, and in our view, a lack of interest in the education of the children of the village, is disappointing. Care for the future children of the proposed subdivision is clearly not a priority for OFP either.

Oākura has formally consulted its community - 86% of the respondents were against the proposal in its entirety. This therefore has to, and does, determine the BOT's full opposition to the proposal.

2. Lack of diligence around key infrastructure and environmental requirements

Many others will no doubt comment on infrastructure and environment requirements. For us they fall into three areas:

- (i) Traffic
- (ii) Water and waste
- (iii) Greenspace

Traffic – Managing the health and safety of our students is an important part of my role as principal of the school. Having the school situated on a no-exit street and close to a state highway brings challenges when considering the risks involved in:

- students travelling actively to and from school
- parents dropping off and picking up their children throughout the day
- students travelling to and from 'education outside the classroom' opportunities
- our community members visiting the school for school events
- other schools visiting for inter-school activities
- school and community buses travelling up and down Donnelly Street and using the turning point next to the school on Donnelly Street
- the challenge of rainy day management and ensuring that school traffic does not interfere with residents' access to their driveways.

We have many safety procedures in place to ensure the safety of our students within this high risk area. We are part of the New Plymouth District Council 'Let's Go' programme and continually promote active travel to and from school, with the intent of improving student wellbeing but also to assist in reducing traffic on Donnelly Street. We supervise the crossings near the school in the mornings and

¹ Statement of Evidence of Michael McKie on behalf of Oakura Farm Park Limited - Relationships Point 17.

² Request for Private Plan Change & Variation to Consent Notice: Oakura Farm Park Ltd 4.3.88 p59

³ Comber Consultancy letter dated 15 October 2018)

after school: volunteer parents are rostered on the Main Road pedestrian crossing from 8:25am-8:55am every school morning and senior students and staff are rostered on both the Main Road pedestrian crossing and the Kea Crossing by the Playcentre, every school day from 2:55pm - 3:15pm. Although these initiatives have enabled us to cope with the managed increase in the number of children actively travelling to and from school and a reduction of traffic in Donnelly Street, we simply could not safely cope with the level of increases created by the proposal.

We are fortunate in having a community that is actively involved in all aspects of the school. We regularly hold events during and after school hours that parents are encouraged to attend, such as sports events, whānau lunch days, grandparent lunch days, open days, learning conferences, environmental projects, assemblies, fundraisers etc. Community engagement is extremely high on all of these occasions. Because most of our parents are coming from work to attend these events they are travelling by car and park on Donnelly Street and the surrounding area. During these times the congestion and pressure on Donnelly Street is a real concern. In my professional opinion, backed by 18 years of experience (walking up and down Donnelly St on duty), the increased number of local residents and school students that would come about if the proposed subdivision went ahead would significantly increase this risk and compromise the health and safety of our students. This 'coal face' assessment over almost two decades surely counts for more than someone coming to the school once and counting car parks and observing the intersection at the end of Donnelly Street for 15-30 minutes... which is our understanding of the rudimentary level of assessment undertaken so far. For me to hear statements like there is 'still significant capacity for car parking' is ludicrous, insulting and misleading about the reality of our school, not just at peak times, but during the many school and community events during the day which we host and are required to travel too. I challenge anyone to drive a bus down Donnelly St and turn it around during one of the above occasions I have mentioned. It's very difficult and requires careful management on everyone's behalf. If the proposal went ahead the consequences just don't bear thinking about.

With a community library and playcentre located next door to our school how are parents with small preschoolers and babies, and the elderly (who regularly use the library during the day) expected to negotiate the sorts of volumes the proposal would create?

OFP's submission proposes a solution for this problem of opening up the paper road between Butlers Lane and Hussey Street. This is a totally unrealistic suggestion as it will redirect some congestion from the end of Donnelly Street and the Main Road and take it to the high risk intersection beside the 4 Square (Butlers Lane, Dixon St and the Main Road). We already actively promote the parking area behind Butlers Bar and Cafe as a pick-up drop-off zone for our parents and students - many of our families take up this suggestion, with children using the footpath to walk through to this area to meet their parents, or to get to school. If the paper road was opened up it would add pressure to an intersection that is already very dangerous and complex. Cars approaching Oākura from the New Plymouth direction have just left a 100km/h area and often travel through this intersection too fast – there is also an issue with 'sunstrike' for drivers at the beginning and end of the day making visibility at this intersection difficult. Only three months ago one of our 12 year old students was struck by a car as she attempted to cross from the corner of Dixon Street to the 4 Square on her way to school. We actively discourage our students from using this area to cross the main road. We also understand that

there is an archeological site⁴ which would make this suggested through-road problematic, if not impossible.

Water and waste

Oākura School is a proud Enviro School. We have a long tradition of being involved in environmental initiatives within the Oākura Community and our local curriculum has environmental philosophy and themes woven throughout all learning areas. We promote citizenship, sustainability and care for our environment with all our students. This can be seen with the long standing involvement in community environmental projects such as spinifex planting on the beach, native tree planting in local reserves, programmes to support the ongoing establishment of the little blue penguin colony and our work with our local hapū Ngāti Tairi on a stream monitoring project, and predator tracking and trapping in support of Taranaki Taku Turanga - Towards Predator Free Taranaki, to name a few.

The changes in our school and local environment that this proposed subdivision would bring about goes against the values that we have been instilling in our students for years. We have always valued the Kaitake Community Board and NPDC consulting and working with our students on environmental and recreational initiatives in our local community. This consultation has shown that they value and recognise the important role the younger generation have in the development and the care of their community. I believe this proposed subdivision has not considered the true and long term effect it will have on the children of Oākura and the local school. The fact that we had one 'consultation' meeting with OFP – that simply outlined the project - supports this assumption.

If our school grew to the capacity mentioned by OFP, I would also question the water capacity in Donnelly Street in the event of there being a fire on the school grounds. We have been directed by the Fire and Emergency Service to keep our school pool water in the pool over the non swimming season for as long as I have been at the school. This is due to the hydrant on Donnelly Street outside the school only providing 15.8 litres of water a second, which is well below the required capacity to put out a fire in our largest school block. To put out a fire in this building requires between 25-50 litres of water a second using three hydrants for a sustained fire attack, according to the Fire Emergency Service regulations. Because they would be using the dead end main on Donnelly Street they can potentially only use one hydrant and therefore need to use our pool water as an alternative water supply. This is the up to date information from the fire service regarding our current school size - more school buildings will make this another risk for our school community.

Greenspace

Our school board has actively managed our steady roll growth for the past eighteen years. We implemented a school zone in 2005 so that we only enrolled students from within this area. We have always been proactive in analysing data relating to this growth and forecasting our needs. We have developed a future master plan that maximises our recreation and green space and we always keep the Ministry of Education informed of our roll growth and related issues. However it has not been easy communicating our needs to the MOE and gaining the classrooms we have needed on a timely basis, to prevent overcrowding and large class numbers. It has been a time consuming and complex balance between leading learning in our school, to managing ongoing property projects due to the

⁴ NZAA site #P19/34 - Oakura Armed Constabulary Redoubt

continued growth. For OFP to state that it is up to the Ministry of Education to provide enough school capacity, shows a lack of understanding of MOE processes and available resources.

A MOE comment (which was a guide) that our school could take up to 1000 students is absurd and goes against all government policy relating to student health and well-being. It simply comes from a MOE property rep inputting our roll number into a MOE calculating table – it does not take into account the reality of the situation. When I questioned the MOE property rep about this 1000 student figure his emailed response was, 'My intention was not to alarm but rather give you an idea of the guide we apply with new schools or those which need more area, which is often the case in Auckland for example. I can think of no other primary school in our area which approach such numbers'. Comparing our school to one in Auckland, which MOE property reps have done, is not appropriate. The schools in Auckland that have had classrooms built on their school fields are in densely populated areas with community facilities nearby. We do not have community facilities nearby - which is totally inappropriate for reasons I will explain soon... One of our legal requirements (National Administration Guideline 1) states we have to provide opportunities for students to achieve success in all areas of the curriculum – giving priority to literacy and numeracy and regular quality physical education'. If our roll was 1000 students we would be unable to provide quality physical education because our sports fields would be non-existent, having been used for classroom sites. The suggestion for us to use local sports grounds is totally unrealistic – the only sport ground close to us is Corbett Park - to take classes there by walking would take about 15-20 mins one way and they would need to walk along a grass verge beside the main highway, with cars travelling 100kmh about one metre away from the children, which obviously is extremely high risk. If we got buses we would have to pay for them to come out from New Plymouth to drive us five minutes down the road - we are a decile 10 school with limited funding provided from the MOE – who would pay for these buses? Therefore our physical education opportunities would be greatly restricted, if not impossible, and the physical and social development that comes from being involved in physical activity and sport (our curriculum obligations) would be severely compromised or non-existent.

Who wants to be signing off or supporting a proposal that removes all Greenspace from a school in NZ and requires negotiating a state highway for all our recreation activities?

Our school fields are also a community asset and used for sports practices and sports games out of school hours, year round. On Saturdays during the summer they are used for inter-school and club cricket games and in the winter sport season the fields are used as a community hub for under 8 football - catering for Coastal and New Plymouth teams. It is also used for U12 football teams for their games and this includes teams from the coast, New Plymouth, Hawera, Stratford, Inglewood and Waitara. There is nowhere else in Oākura that this could be held as Corbett Park is being used for the older football teams at the same time.

We have also heard comments that schools in Auckland and other main centres have less greenspace than Oākura school. Oākura is not a main centre, it is a town, a town with approximately 1500 people and 549 homes. We are not against managed growth. We support it just as we have in the past. We don't support the ad hoc growth that would come about if this subdivision went ahead

3. Lack of alignment to existing agreed plans/strategies for managed growth

The proposal cuts across all known (and previously consulted) and documented community strategies, including those endorsed by the NPDC and implemented into Long-Term Community Plans. While this process is a legitimate mechanism to usurp all that work, given the scale of the opposition, it is clear to our community that it is not a palatable nor a better alternative, to existing and previously formulated plans for managed growth (not limited to land already zoned for residential development i.e. The Holdom lots).

As a school we are near capacity right now. We have coped with the steady growth of Oākura over recent years. The school could simply not cope with the type of growth in the proposal and the scale of the numbers in the proposal are not tenable. While it is acknowledged there are some solutions proposed from the Ministry of Education to accommodate such growth, none of these are palatable to the Board of Trustees, nor have they been tested and proven to us as a BOT for the many reasons below:

The Oākura School roll has gone from 200 in the year 2000 to the current roll of 360 students - a steady growth of about 8-10 students each year. This year we are already 20 students above the roll of this time last year. Next week our roll reaches the figure that 'should' trigger our 16th classroom. We then begin the challenging negotiations with the MOE to firstly access and gain approval, and then plan, and oversee the placement or build of this new teaching space. From previous experience we know that we can not assume that it is automatic that we receive funding or approval for a classroom even when we have the roll numbers to trigger this - it is totally dependent on available funds within the MOE budgets - not on our needs.

We have already made many compromises to accommodate extra classroom spaces over the years. Recently, following negotiations with the MOE, we agreed to one of our multi-purpose spaces being transformed into a teaching space - thus losing a valuable indoor room previously used for technology, art, music, drama and small group activities. Then more recently we were forced into locating a modular classroom on to a much loved junior soccer field. Even the placement of one classroom on this previous sport/recreation area changed the social dynamic of our students' play during interval time. During the planning process we did our best to ensure that duty teachers still had 'line of sight' to all 'play areas', but the more buildings that are added to our site makes this an ongoing challenge for our duty teachers. We have a space planned for one more classroom - but any more students, and therefore classroom spaces - will seriously compromise the safety of our students and the curriculum we can provide for our students on our current site. The lag between roll growth and actual approval from the MOE for classrooms is not seamless nor is it guaranteed. Any other assertions around this are naive and not representative of the reality.

We have heard comments that a solution to our roll growth would be to decapitate and become a year 1-6 school. Being a full primary (with year levels 7 and 8) is very important to the special character and culture of Oākura School and removing these year levels is not tenable to the school nor the Oākura community.

If we compare the size of the Oākura School site, which is 2.65 hectares, with the only two Taranaki schools (which are secondary schools) with rolls over 1000 it is really interesting. NPGHS has 11 hectares and NPBHS approximately 14 hectares. It makes the suggestion of our school with 2.65

hectares being forced to take 1000 students unbelievable. 2018 MOE⁵ data shows that NO Taranaki primary school has a roll in excess of even 500 students. Highlands Intermediate is the biggest Intermediate in Taranaki with a roll of 697. Still a long way off 1000 and the only Intermediate over 500 in Taranaki. Wait for it... Highlands Intermediate has 6 hectares. In case everyone missed our point...we have 365 students and are near capacity right now and have 2.65 hectares with no opportunity to acquire more land.

With the MOE's own emphasis on the 'network of schools', it seems contradictory to promote or even support overcrowding at a school already at capacity on such a small site, when there are so many other schools around the region that have capacity and empty classrooms. The only way we can spread students around the network of schools effectively is for agencies to work together and stop imbalances, such as the one in this proposal, occurring. When you look into other large schools around Taranaki and even New Zealand, there is not only more than adequate access to greenspace (excluding the requirement of navigating a state highway), but significant infrastructure to support their size. Simply saying the MOE will sort it out, and it will all be okay, lacks foresight and common sense.

Oākura school has regular and open dialogue with key community groups. The Kaitake Community Board being one of those for example. We have invested in regular open dialogue and consultation and therefore the plans for managed growth developed in conjunction with such groups are the only ones we support at this time.

4. Previous breaches of integrity by OFP

In our view there have been serious and clear breaches of integrity by OFP which unfortunately provide Oākura School with low confidence pertaining to the many personal undertakings in the proposal. Some of those breaches include:

- a. A previous promise⁶ (verbal and in writing) that lot 29 would remain farmland in perpetuity
- b. A previous requirement to undertake ecological testing⁷ (i.e. first Monitoring Report for Wetland Birds and Goldstripe Gecko was 9 years⁸ late and only came after pressure to produce them)
- c. In our view the inability of OFP to participate in previous forums about growth in the region through known community channels⁹ - this seems surprising to us for an applicant that is providing us with (in their words) a '*smart growth*¹⁰' solution.

⁵ <https://www.educationcounts.govt.nz/statistics/schooling/student-numbers/6028>

⁶ Brief of Evidence of Michael McKie in the matter of the resource consent application to subdivide land at Wairau Road, Oakura, New Plymouth [The Paddocks]. Brief of Evidence of Michael McKie in the matter of the resource consent application to subdivide land at Wairau Road, Oakura, New Plymouth - point 11

⁷ Final Decision of Independent Commissioner Helen Tobin - March, 2011. Conditions Section 14/Ecology Point 14.6 P116 and 14.7 P117

⁸ Certificate for the conditions referred to (14.6 to 14.7) was issued on 20 February 2019, with the first Monitoring Report for Wetland Birds and Goldstripe Gecko due by 21 February 2020.

⁹ Coastal Strategy 2006, the Oākura Structure Plan 2006, reference to the Mana Whenua Mana Moana Position Paper 2006, Oākura Village Recreation and Community Facility Study 2011, the Oākura Community Engagement Project Report 2014/16 and the subsequent Kaitake Community Plan: A Thirty Year Vision 2017

¹⁰ Request for Private Plan Change & Variation to Consent Notice: Oakura Farm Park Ltd P50

This is very relevant to us as a key community stakeholder. Maybe we are a bit 'old school', pun intended, where your word and written undertakings count for something. Yes, there are legal considerations and formalities but what about good old fashioned values based conduct.

We believe this should also be relevant to the hearing commissioner, because there are many future undertakings and statements¹¹ of personal belief, ambiguity, opinion, guesstimation and goodwill that the community are requested to accept on behalf of OFP throughout the proposal. This does not even account for what could happen if the land is on-sold to out of town developers. Ultimately, the best and only accurate predictor of future performance is past performance.

Summary

The Oākura BOT oppose the proposal in its entirety. Reducing the number of lots for sale by way of a compromise should also be declined because of all the reasons stated above.

Our school motto is; *learn to think / learn to care*. Nothing we have seen shows that this proposal aligns to our motto. It flies in the face of the great collaborative community thinking already completed. It certainly does not show the right care for the environment and most importantly it does not show the right care for our tamariki and their families.

¹¹ i.e. 'It is envisaged that the development of Wairau Estate will be both staged and sequential'
Private Plan Change & Variation to Consent Notice: Oakura Farm Park Ltd P51