Te Ātiawa Manawhenua ki Te Tau Ihu Trust’s Submission on the National Policy Statement – Urban Development (NPS-UD)

Thank you for the notification of consultation on the above NPS-UD. In the following, the Kaitiaki o te Taiao | Guardians of the Environment Office of the Te Ātiawa Manawhenua ki te Tau Ihu Trust (Te Ātiawa) has documented thoughts in response to reading the consultation document. We acknowledge that the following is not a direct answer to any particular submission question. Given the widely acknowledged declining state of the natural environment, we felt that proposing some bigger picture thinking was in order, to ensure that our aspirations permeate throughout the NPS-UD. Aotearoa New Zealand simply cannot proceed in the manner it has in the past, particularly going into an uncertain future and where population pressure and resultant demand shows no signs of abating. This moment in time must be viewed against the published environmental metrics, which provide sombre reading (New Zealand Government, 2018). Drawing on the collective wisdom of the two Treaty partners, we have this unique opportunity to create ground-breaking approaches to how our urban areas change. We applaud the proactiveness of the Ministry for the Environment in all its initiatives under this Government to advance better outcomes for Te Ao Mārama and its citizens. However, we do lay down the challenge - we can, and need to, do better - by thinking differently, together.

A key concern of Te Ātiawa is that this NPS-UD is set to perpetuate the thinking and practices of the past, rather than taking bold steps to ensure new futures. There is clear evidence that the ‘status quo’ and ‘business as usual’ mode of operation contributes to a deteriorating Te Ao Mārama, the natural world, and this decline includes the contributions from urban environments (Ministry for the Environment & Stats NZ, 2019). Care for the host that sustains us must have primacy in any NPS, regardless of whether the NPS is for urban environments, indigenous biodiversity or freshwater. With this in mind, we anticipate that this NPS-UD contains a significant change in thinking, regardless of the challenge this might present its audience. It was presented in your letter to us “that we work together to address the challenges to which our planning system has struggled to respond”. We offer that a significant contribution to the ‘planning systems’ struggles has been the lack of foundational principles, and thus the ability to provide a vision encompassing a holistic collective outcome. The planning system is driven by fragmentation and process, rather than being a system where desired outcomes are clearly defined and understood. The imagery that surrounds ‘urban’, ‘development’ and ‘growth’ do not serve to illustrate anything close to what ‘a quality urban environment’ could look like (and from whose perspective?), largely due to the free-market economic paradigm so imbedded within the terminology, and the fact it is underpinned by an anthropocentric focus.

As tangata whenua, Te Ātiawa has aspirations which see Te Ao Māori as central and guiding in an Urban Development Policy, particularly if it is to contribute to a ‘culturally sound urban development system’. To this end, the opportunity to truly partner (as Treaty partners) with tangata whenua, through drawing inspiration from Te Ao Māori, is not currently evident in this developing policy. Taking a quote directly from the Biodiversity Collaborative Group report explains the opportunity that is currently absent in this NPS-UD:
“The NPSIB presents a unique opportunity to begin to transition Aotearoa New Zealand’s environmental management system to one in which te ao Māori, mātauranga, and tikanga Māori, sit on an even footing with western environmental management as the system’s philosophical underpinning.”

(Biodiversity Collaborative Group, 2018)

Further to this, the pan-īwi foundational principle of Te Mana o Te Wai in the NPS-FW demonstrates an existing gazetted application of such an opportunity. The principles of Te mana o te Wai and the proposed Hutia Te Rito for the NPS-IB, present a descriptive vision; a holistic goal; a foundation philosophy; guiding principles. Principles that draw together people, place and environment – and that capture social, cultural, spiritual, economic and environmental aspirations into a compact concept. The ability for Te Ao Māori, mātauranga, and tikanga Māori to sit on an even footing with ‘western’ thinking within the context of urban development, is just as relevant as it is in national policies for indigenous biodiversity and freshwater. Urban development is intimately connected in a multiplicity of ways with the natural world, and urban areas are integral parts of functional ecological systems. All ‘resources’ utilised in urban development are drawn from this boundaryless natural world – Te Ao Mārama (both locally and globally). It is this high-level partnership that we wish to see throughout the NPS-UD. It is therefore appropriate to develop foundational principles for the NPS-UD similar to the opportunities taken in both NPS’s for freshwater and indigenous biodiversity. In doing so, the overarching NPS framework would interconnect and support each other’s grounding philosophies, all resting on and positively contributing to, the desirable platform of a healthy natural world.

Additionally, we have aspirations to see the descriptive features of ‘a quality urban environment’ drawn from contemporary kaitiaki principles. This would include for example, descriptions founded on:

- a holistic approach – everything is connected – ki uta ki tai (mountains to sea);
- the well-being of people resting on the well-being of the natural environment – iwi hauora ao hauora
- All mahi to result in enduring net restorative outcomes; functional ecological systems underpin quality.
- Acknowledging / respecting Atua
- All whakaaro tested against Mātauranga Māori
- Implemented through Kaitiakitanga
- Focused on Mauri
- Mana before Money/Ecology before Economy
- Heal the People / Heal the Planet

A healthy balanced natural world (which includes the human species), people with a quality sustainable lifestyle, which is underpinned by socio-cultural equity and justice.

(above taken from Te Ātiawa Contemporary Kaitiakitanga in Rohe Management)
Following is an extract from a response we submitted to a subdivision proposal in our local rohe. It demonstrates elements that would be expected to be found in a ‘culturally sound urban development’ and ‘quality urban environment’.

**What’s optimal for kaitiaki – a subdivision that:**

- Respects the whenua and all that it hosts
- Determines if there are cultural sites in this place and responds accordingly
- Speaks to the overall receiving environment
- Addresses the ecology; habitat / biota, natural world life
- Serves the *needs*, not *wants* of the people, particularly Te Ātiawa whānau, i.e. includes mixed use / *affordable* housing opportunities
- Considers contextual landscape and amenity
- Emerges from tikanga (kaitiakitanga) delivering ‘real profits’ for the Planet and People, as opposed to a money-profit focus for a few
- Limits impervious surfaces in regard to housing and hard infrastructure, e.g. road surfaces
- Uses locally applicable Māori names for the development area at large, streets, access lanes, reserves, etc
- Limits housing height as the slope steepens (single storey limits for upper-contour houses), so as to provide a non-housing-dominant perspective, that might otherwise detract from the visual amenity back-drop provided by Victoria Domain
- Provides efficient walking and cycling connectivity / access to existing, local track networks for all housing developed
- Ensures that the development is environmentally sensitive in the round, by imposing covenants for eco-housing, cohesive architectural themes, impervious surface limits, solar heating / power, roof water storage, limited car space on site, use of native planting species, etc
- Offers an overall improvement to ‘urban ecology’ via insitu-eco-corridors and the like
- Provides narrower, chicaned roading, with water gardens for run-off and extensive native planting of berms – not grass
- Delivers a synthesis of shared-space for natural and human occupation
- Principles of whenua-planning from the Te Ao Māori Perspective:
  - Tikanga Based
  - Acknowledging / respecting the Atua
  - All whakaaro tested against Mātauranga Māori
  - Implemented through Kaitiakitanga
  - All mahi to result in **Enduring Net Restorative Outcomes**
  - Focused on Mauri
  - Mana before Money
  - Healthy Planet – Healthy People: iwi hauora ao hauora

(extract from Kaitiaki o te Taiao review of a local subdivision proposal)

We note that the preamble to the NPS-UD may include a description of things that contribute to quality environments including: reducing the impact on the natural environment; and using ecologically sensitive design, as a means of explaining the intent of the NPS-UD. The fact that these elements would have no legal weight is of particular concern. A NPS-UD would seem the appropriate place to provide assertive direction toward requiring ecologically sensitive design including smaller footprints for housing (literally and ecologically), particularly where the tools for applying Ecological Footprint methodology to urban development policy is growing (Kuzyk, 2012).
As stated earlier, the continuation of the same paradigm where large footprint housing is coupled with declining occupancy rates; people are isolated from village life; and two car garaging supports a car friendly future; suggests a design paradigm that needs to be redirected.

Development is firmly in the hands of the private market and this has concerning outcomes for Iwi in terms of Māori social housing specifically, and affordable housing generally. Increasingly, private covenants introduce more restrictive requirements than District Plan rules might require (thereby out of the Councils hands), and we argue that covenants contribute to un-affordable housing despite the Productivity Commission’s response to the contrary (Productivity Commission, 2017). One key aspect with regards to affordability is the potential for ‘invisible’ discrimination and segregation through the notion of ‘exclusion through design’ (Schindler, 2014). This is a little considered, and certainly unacknowledged, by-product of modern architectural design requirements on subdivisions by developers. Māori are owed the ability to live, work, play and die in their rohe. Urban change should not be exclusive of that imperative.

A bottom-line requirement of any urban development should be environmentally sensitive design, where enduring net restorative outcomes are a not-negotiable. Quality urban environments therefore should require for example: minimal impervious surfaces; small footprint housing; incorporation of water cycle concepts where the mauri of water is an integral component (Morgan, 2006); restorative urban ecology; etc.

It is not possible to conceive that Māori have been involved in this mahi from the outset, by virtue of its continuation of failed and failing notions, and lack of evidence of changed or challenged paradigms. Two treaty partners with differing foundational worldviews, and yet one still dominates the formative basis for this NPS-UD. Little wonder that there is the decline in environmental quality that we are witnessing.

Let’s ensure that this NPS-UD does not deliver and continue the ‘business as usual’ ‘fairy tale’ that the young Greta Thunberg challenged

References


