

Submission by The Normandale Residents Association

On the HCC 2012 LRP

Thank you for the opportunity to make a submission on the draft LTP for 2012.

With regard to the items selected by HCC within the summary plan, we would make the following comments.

1. We support the concept of having an integrated vision for the city that both combines and reflects the needs of individual communities. We submit that the appropriate method for the development of this vision document would be an integration of bottom up views developed by community organisations in conjunction with Community Boards and ward committees.

With respect to the dot points identified in the summary document we support the concept of service hubs, providing this is not interpreted as an excuse to diminish the provision of services either geographically or in scope.

We strongly support the enhancement of greater provision of walking and cycling opportunities, but would also submit that greater emphasis should be placed on walking and cycling as a normal and expected method of transport rather than as recreation.

We also strongly support the concept of developing and creating linkages between 'pocket parks' and in particular the development of a city wide (not just valley floor) cycle and walkway network.

We are therefore very concerned to note that no provision is made in the Parks and gardens budget for 2012-3 to 2014-15 for new tracks or track upgrades. This is clearly at odds with the two objectives noted above and we submit that a budget of \$105K be allocated to this heading for these years.

2. With regard to managing finances we consider that the options offered in the summary draft are meaningless. Obviously keeping rate rises to the rate of inflation is desirable, and should be the preferred option. Equally, there are circumstances where this may not be appropriate. 'Limit' is too restrictive a term in this context.

Similarly net debt needs to be managed, and HCC has done this effectively. However with the cost of borrowing at an all-time low, it may be fiscally prudent to bring forward capital expenditure projects to take advantage of this. Again the terminology used is inappropriate.

3. We oppose the suggested changes to rating differentials in the draft LTP. We consider that the analysis on which the proposed changes are based is inadequate. First, the allocation of public good benefits is stated to be on the basis of 'Council's interpretation of economic principles'. This begs two questions, what 'economic principles, and what interpretation. Economics is not a physical science obeying

immutable laws, but rather a belief system, and both interpretation and consequences predicted depend on the observers world view. It is suggested that rather than economic principles, the analysis on which this proposal is based is founded in financial considerations which by definition and unlike economics, limit the data considered to those directly affecting an individual organisation. We are concerned that such an analysis typically undervalues or ignores qualitative and intrinsic values on the basis that these are too costly to capture. The inevitable outcome is that easily quantified costs to business dominate over the qualitative and intrinsic values that more frequently define the costs to individuals and hence residential properties.

We consider that the proposed allocation of costs for museums in proportion to CV is reasonable, and consistent with the existing policy for other publicly provided amenities of a similar nature. We consider however that the proposed change to rural rates for Parks and Reserves inequitable, and contrary to common sense. We consider the imposition these rates as proposed ignores two fundamental considerations. First although it can be argued that rural ratepayers derive a benefit from these facilities as citizens of Lower Hutt, the mechanism proposed ignores the degree to which rural residents provide such facilities themselves to the benefit of the city as a whole. Second, since the proposal is to base the rate levied on CV, those with larger properties and who contribute most to the public good through these will be most disadvantaged.

Since no data is provided on the activity costs with regard to roading, we cannot comment.

We also oppose the reallocation of rates regarding storm water. We do not consider the impervious surface area a valid metric for this, since it suffers from the same shortcomings identified above. It is a convenient and easily obtained metric, rather than a realistic evaluation. To take a single example, it is a reasonable assumption that water falling on impervious surfaces in commercial development will enter the storm water system directly. The same assumption cannot be made with residential property that may use integral soakaways and rain harvesting systems.

We oppose the change in allocation for environmental management on the same grounds. The HCC paper correctly states that environmental management activities protect public interests, and that both residential and business properties benefit. We would submit however that the costs of these activities should be allocated in proportion to the activities creating the area to be managed. We see no evidence that this has been considered. The statement 'after maximising user charges' provides no comfort that vested interests have not benefited at the expense of the wider community.

Finally we consider that the proposed change, by ignoring economic analysis in favour of financial costs fails to meet the requirement of Section 101(3) (b) of the LGA to take into consideration the current and future social, environmental and

cultural wellbeing of the community. We submit that to fully meet their obligations the Council must also consider with stage 2 of the review, these factors, which must also take cognisance of the increasing number of residents on low and fixed incomes who have no ability to offset rates increases in the same way as commercial entities.

4. We consider that HCC has a moral obligation to protect its workforce and that earthquake strengthening should be undertaken as soon as practical. In line with our submission on council finances, we submit that this activity should be financed by increased borrowing to whatever extent is necessary.
5. We do not consider the proposed package to stimulate growth addresses this in any way. We do not support the reduction in other service levels to finance this.
6. We would submit that the median projection be used for planning. We consider housing development should concentrate on 'brown field' development. We feel very strongly that emphasis in the district plan should be on the provision of high quality and energy efficiency. We would support the development of apartment blocks and infill housing under these criteria. Note that infill housing in this context should not be construed as sub dividing / crossleasing etc but rather an integrated re-development of existing housing sites.
7. We have no comment on the Regional development fund
8. We strongly support the retention and repair of the civic fountain using coloured LED in line with the previous consultation document.

In addition the items above we would submit that provision be made in the waste minimisation budget for local initiatives within each community for the collection of rubbish and recyclable material not serviced by the weekly collections.

We note and strongly support the retention within the Parks and Gardens budget of the \$100K allocated for the development of recreation area at Poto Road corner.

P. Matcham
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