# **Annual Plan Submission Stratford District Council**

# by Climate Justice Taranaki www.climatejusticetaranaki.info

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**Contact for this submission** 

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We would like to speak to our submission.

#### Tēnā koutou, tēnā tātou,

Ko Rangi
ko Papa
ka puta ko Rongo
ko Tānemahuta
ko Tangaroa,
ko Tūmatauenga
ko Haumiatiketike
ko Tāwhirimātea.
Tokona rā ko te rangi ki runga
ko Papa ki raro
ka puta te ira tangata
ki te whai ao
ki te ao mārama
Tihe, mauri ora!

Please find below our comments on the draft annual plan for the SDC for 20114/2015. Some councillors will be familiar with the work our group does. We are opposed to the oil and gas industry because of its impact on the local and global environment. Our group combines environmentalism with the quest for social justice.

We would like to state our opposition to the drilling for fossil fuels. We need to take climate change and the risk to our local environment seriously and leave the oil and gas in the ground. A NO to fracking, landfarming, deep-well injection, drilling and flaring is a YES to a sustainable and just future for the generations to come.

Our group submitted in detail for the council's Energy and Climate Change discussion document (CJT, 7 March 2014, <a href="http://climatejusticetaranaki.files.wordpress.com/2014/03/cjt-submission-on-the-sdc-energy-climate-change-discussion-paper-v5-final.pdf">http://climatejusticetaranaki.files.wordpress.com/2014/03/cjt-submission-on-the-sdc-energy-climate-change-discussion-paper-v5-final.pdf</a>). We encourage you all to read that submission in conjunction with this annual plan submission.

We provide some specific comments to sections as they appear in the draft plan.

## **Economic Development**

It is not quite clear from the budget, how much money the council gives to the Venture Taranaki Trust. Our view is that Venture Taranaki is doing an inadequate job and that the type of economic activity promoted by them is not sustainable. As such, it can't be called development because the idea of development hinges on sustainability.

Venture Taranaki has shown on many occasions that it is a strong supporter of the oil and gas industry in Taranaki and wants it to expand. We are not opposed to economic development. However, we don't consider developing our fossil fuel addiction and further putting the planet at risk to the point of no return is a worthwhile activity.

We want economic development that is based on sustainability. We want economic development based on justice. The oil and gas industry offers high salaries for the CEOs and a few international workers and profits for the shareholders. However, to the rest of the community we get a few short-

term casual jobs and corporate sponsorship (with corporate advertising) of things that should be community-run resources. The planet just gets used up and trashed.

We don't want rate-payers money wasted on promoting a dead-end strategy. Either Venture Taranaki adapts to the global realities of impending climate change, or they should cease to receive public money.

#### **Rental and Investment Properties**

We would like the council-owned farm to be a certified organic farm. Public money should be used to promote sustainability. Intensive dairying has major impacts on the local and global environment, whereas organic dairy practices benefit the land, the cows and the workers. This should be a priority.

We want to ensure that public money is invested along ethical guidelines put in place by the community. Therefore, we want ethical guidelines added to the current investment policy. For example, we don't want our money invested in weapons manufacturing, the tobacco industry, fossil fuel extraction or forest destruction. We urgently need a community-wide discussion to create such guidelines and we think it is a priority for council to initiate that. This is public money therefore the public gets to decide what it is invested in.

# **Environmental Planning**

We believe Council's 'Environmental Planning' require substantial improvements if it is 'to promote sustainable management and use of natural and physical resources' effectively. The District Plan currently fails to protect the public and the environment from the aggressive expansion of oil and gas activities. The impacts of such activities commonly include unacceptable noise and light disturbance to nearby residents, heavy traffic with its associated danger to road users, and the substantial safety and environmental risks from the storage and transport of hazardous substances associated with drilling, fracking and production.

The assessment, monitoring and control of these impacts are all within council's responsibilities, yet does the council have adequate technical capacity, financial resources and political will to truly deliver? We urge Council to objectively assess these and to come up with capacity building and resource gathering strategies, such as raising consent application fees, introducing monitoring charges and insisting on bonds to cover in-depth investigations on specific cases.

Council admits in the annual plan that 'work on consents relating to the Energy Industry has increased and Council has had to take on contractors to help with this work'. Have the costs of these contractors been paid for by consent applicants or rate payers? The industry should be made to cover all the costs involved in consenting and monitoring.

It is clear to us that the current land-use consenting process does not take into account comprehensive assessment of effects on nearby residents and the environment. Notably, the unbundling of consent processing and separate hearings between district and regional councils does not allow assessment of cumulative impacts; such as health impacts from noise, stress, safety risks from hazardous substances, air pollution from flaring and potential water contamination from waste discharges, all combined.

We strongly request that SDC and TRC commit to joint assessment and hearings of consent applications on inextricably linked oil and gas activities.

Another important case of cumulative impacts lies in the risks from intensifying and upscaling fracking and deepwell injection activities across the landscape. Such risks include groundwater contamination and damaging earthquakes, the latter have been well documented recently in scientific literature and ha#ve prompt US authorities to tighten relevant regulations (see CJT media release, 1 April 2014 (<a href="http://climatejusticetaranaki.info/2014/04/01/media-release-deepwell-injections-cause-earthquakes/">http://climatejusticetaranaki.info/2014/04/01/media-release-deepwell-injections-cause-earthquakes/</a>); AP 11 April 2014 (<a href="http://bigstory.ap.org/article/ohio-regulators-link-seismic-activity-fracking">http://bigstory.ap.org/article/ohio-regulators-link-seismic-activity-fracking</a>)). Increasingly, the line between 'natural' and human-induced hazards is becoming blur. Council indeed needs to keep abreast with scientific research and evidence overseas to inform its policy and make regulatory changes to minimise hazards to people, infrastructure and the environment.

Moreover, the Parliamentary Commission for the Environment's final report on her investigation into hydraulic fracturing is due to be released shortly. We urge Council to consider carefully the Commissioner's findings and recommendations when finalising the Annual Plan, reviewing the District Plan and processing relevant resource consents.

#### **Roading**

We note that a lot of money is spent each on roads. We appreciate that, given our fossil fuel dependency, roads need to be fixed. However, we oppose further widening of roads. This money is better spent on public transport initiatives as we transition to a fossil fuel free society and low-carbon economy. We don't have a choice but to do so because in about 20 years time we will live in a very, very different world with unaffordable petrol. Firstly, oil is a finite resource. Secondly, the burning of fossil fuels is the key contributor to the greenhouse effect and climate change. In order to prevent, catastrophic climate change, we need to urgently change our lifestyles and our society to ensure that we don't destroy our planet beyond repair.

#### **Stormwater**

We would like some background information that explains the reference to "protection from a 1 in 5 year flood" under performance measures. Has climate change projections and the likely increase in frequency of extreme events been taken into account?

According to the latest IPCC report (IPCC 2014, chapter 25 on Australasia), annual average rainfall is expected to decrease in the north-east South Island and northern and eastern North Island but increase in other parts of New Zealand. So we can expect more rainfall in Taranaki, with increasing risks of flooding.

The New Plymouth District Council acknowledges climate change in the stormwater drainage section in its draft annual plan. The IPCC report talked a lot about adaptation. Yes, we need to adapt to the new realities and ensuring that there is adequate stormwater drainage is certainly important. However, we need to move beyond adaptation and ensure that we work towards preventing catastrophic climate change (ie. no further oil and gas extraction!).

We also need to look more carefully into district planning, notably the protection of green space for rainwater retention and management of our built environment (including urbanisation and roading) to avoid exacerbating stormwater runoff and flooding.

A crucial element in storm water and flood protection is providing sufficient natural storage of water such as wetlands and vegetation to allow the land to act as a sponge that soaks up and slowly releases water and thus reduces the impact of heavy rainfall. By concreting surfaces and clearing waterways we allow water to run off faster bus this is not necessarily a good thing. Increased speed increases the force of the water causing further erosion of soils, riverbanks and beds and allowing more debris to be moved and more threats to the safety of people and livestock.

We should therefore be reducing compacted soils and concreted surfaces and utilising grass, vegetated soils, gravels or those specially designed concrete tiles with holes in them. Wetland protection and riparian planting should be a priority.

#### Wastewater

The treatment of wastewater remains a major issue, both in the cities and in rural areas. We think that both septic tanks and centralised wastewater treatment facilities are failing us and the environment. They are expensive and ineffective, pushing our waste out of mind and out of sight.

Instead, we think council need to urgently investigate and promote natural sewage or composting toilet facilities with separate grey and black water systems, where possible. Most grey water can be used on gardens, orchards and pasture as irrigation. Black water can be treated biologically as we are starting to see dairy effluent systems move towards. This reduces or halts the need for chemicals, reduces methane emissions, greatly reduces water pollution and creates a valuable compost fertiliser. The methane can be collected for energy use as is being demonstrated at Lepperton's piggery and on small scales elsewhere. It also upskills the community on waste issues and creates employment. Many communities across the globe are leading the way in implementing these natural sewage systems instead of treating it chemically or simply dumping it. We encourage the council to look into this as a matter of urgency.

#### Waste management

Again, it is important to acknowledge our fossil fuel addiction when it comes to our waste: plastic, plastic and more plastic. Not only are we filling landfills that then leach into the environment, our oceans are covered in plastic waste that then enters the food-chain. Plastic takes millions of years to biodegrade and in the meantime creates a soup of tiny toxic plastic particles in the sea that get eaten by birds and fish whom we later consume. Yes, we need to recycle but we also need to stop this plastic-madness! There are many cities around the world that are now 'plastic-bag free' or even 'plastic-free'. The district should be working towards this as a near-future goal.

We think that a monthly recycling pick-up is not sufficient. Recycling needs to be habitual and therefore should be more regular than weekly, maybe bi-weekly or even weekly.

A green waste collection service (in addition to the transfer station) especially for urban people would be useful, to reduce methane emission from landfill. Others councils collect green waste from households, then process them into high grade compost and mulch which are sold back to the

public at the transfer station.

We think more money should be made available to waste minimisation education and recycling programmes in the community to teach people how to recycle and how to rely less on wasteful packaging and disposal items.

The council should be working towards zero waste by 2020 as more proactive towns such as Raglan, Kaikoura and Wanaka are doing. They utilise many ingenious ideas such as stockpiling currently unrecyclable items to be sold later as markets open up, operating shops to sell re-usable items, compacting waste into wool fages, crushing glass on-site to use as a leachate under the landfill and selling compost made on-site. These industries have greatly reduced waste in a very short time, created lots of new jobs, created income for council and greatly extended the life of landfills.

### **Water Supply**

There is currently a rapid expansion of the oil and gas industry and escalating number of discharge consents issued by the regional council, allowing the discharge of industrial waste (e.g. treated stormwater, produced water, surplus drilling water) onto land and into tributaries and streams.

Council needs to acknowledge in the Annual Plan the current and emerging impact of the oil and gas industry on council's ability to provide residents with a safe, reliable, sustainable and affordable water supply. More specifically we seek detailed information from council regarding the total watertake (surface and groundwater) and the cost paid by the oil and gas industry.

We also ask SDC to review the current water monitoring and treatment facilities, to ensure that water intakes are free of oil and gas contaminants and that there is adequate monitoring/testing to ensure that water treatment facilities are able to provide safe drinking water (See Kassotis et al. 2014, http://press.endocrine.org/doi/abs/10.1210/en.2013-1697?journalCode=endo&).

Moreover according to the Ministry for the Environment Guidelines for Local Government on Managing Environmental Effects of Onshore Petroleum Development Activities (March 2014, http://www.mfe.govt.nz/publications/rma/managing-environmental-effects-onshore-petroleum-development-activities/index.html), "[d]rinking water suppliers are required to prepare a plan for managing the risks of contamination under the Health Act 1956. If oil and gas activities have the potential to contaminate drinking water supplies (either through groundwater or surface-water contamination), councils should consider whether the relevant district health board and any drinking water suppliers should be treated as affected parties for the purpose of notification on resource consent applications." We urge council to take note of the MfE guidelines and work with the Regional Council and District Health Board in processing consents which have implications on the sustainable provision of a safe drinking water supply.

#### **Intergenerational Equity**

It is interesting to see the mentioning of 'intergenerational equity' (page 54) in the draft annual plan in regards to funding depreciation. We would like to reiterate our concern on the costs on future generations, i.e. intergeneration inequity, should we continue down the fossil fuel extraction model rather than transitioning onto sustainable, renewable energy and a low carbon economy that is

socially inclusive and fair to future generations.

We will end this submission here and will expand on it when it comes to the hearing.

# Nga mihi

Urs Signer, Catherine Cheung and Emily Bailey on behalf of Climate Justice Taranaki