

# New Plymouth District Council Draft 10 Year Plan 2018/2028

## Submission by Climate Justice Taranaki, 9 May 2018

### Introduction

1. Climate Justice Taranaki Inc. (CJT)<sup>1</sup> is a community group dedicated to environmental sustainability and social justice. This includes issues of inter-generational equity, notably in relation to climate change, which will impact future generations' inalienable rights to safe water, air and soil, crucial to sustaining livelihoods and quality of life. CJT has been incorporated under the Incorporated Societies Act 1908 since 26<sup>th</sup> February 2015.
2. We welcome the opportunity to provide feedback on the New Plymouth District Council's Draft 10 Year Plan 2018/2028. We commend Council for bringing climate resilience to the forefront of discussions in the Draft 10 Year Plan, especially in regards to water management. We acknowledge Council's effort and intention to respond to 'growth' but caution the need to recognize the 'growth paradigm'. *"Climate change... A momentous example of humanity learning the laws of nature but failing to apply them judiciously, it attests to economic growth actually decreasing humanity's ability to control the natural environment, as the planet [careens] towards feedback-fuelled runaway warming"*, warned Prof. Gareth Dale, 2012<sup>2</sup>.
3. When preparing for this submission, we have also reviewed Council's Infrastructure Strategy (2018-2048)<sup>3</sup>, Tapuae Roa – Make Way for Taranaki Action Plan (April 2018)<sup>4</sup>, the New Zealand Productivity Commission's draft report on Low-emissions economy (April 2018)<sup>5</sup>, the Government Policy Statement on Land Transport 2018-2028 (Draft of 14 March 2018)<sup>6</sup>, and various other non-government publications.

### Issue 1 – Water Resilience

4. We agree with Council's preferred Option 3 – *"Invest more to look after our current Drinking and Waste water networks and invest in upgrades to make our Drinking and Waste Water networks more resilient."*
5. However, we urge Council to invest more in wastewater treatment rather than having the majority of the funding allocated for drinking water, as indicated in the Infrastructure Strategy.

### Wastewater management

6. More specifically, we support the Friends of Waitara River's request to Council to upgrade the New Plymouth Wastewater Treatment Plant (WWTP), notably to introduce UV treatment to disinfect the wastewater, and potentially other treatments to remove microplastics and organic contaminants. We do not believe that the upgrade of the WWTP from 2012 has met community expectations.
7. In terms of additional funding for wastewater treatment upgrade, we strongly recommend the users-pay principle, whereby adequate fees are imposed on industries, notably Methanex, which continue to use the marine outfall to discharge contaminants into the environment. Some of the proceeds from the sale of the leasehold land in Waitara could also be invested into the much-needed upgrade of the WWTP.

### Drinking water – Response to growth & building resilience

8. Council's Infrastructure Strategy highlighted New Plymouth residents' excessive level of water consumption – 30% above the national average – and expected a 20% rise in water demand over the next 30 years in line with the projected growth of the district. Currently, some 28.7% of New

Plymouth's water supply is lost to leakage<sup>7</sup>. Priority must be given to tackling the over-consumption of water, through the various demand management options listed in the strategy, as well as repairing leaks in the network, water metering, tightening restrictions and increasing charges on industrial users.

9. Another effective way of responding to growth is to create rules and incentives for businesses and households to become at least partly responsible for their own water supplies.
10. As an example, Kapiti Coast District Council's Plan Change 75<sup>8</sup> (2011) requires new residential dwellings to have rainwater tanks and/or greywater irrigation systems, for outdoor uses and toilet flushing; and no outdoor taps can be connected to the municipal water supply. If space is an issue, even small collection barrels on water down-spouts can greatly reduce storm water surges and provide decentralised emergency water supplies.
11. As we explained in our feedback on the draft NP District e-Plan in March 2018<sup>9</sup>, such interventions by way of a District Plan Change and/or financial incentives would reduce the demand on Council's water supply as well as building community resilience.
12. Wastewater can also be dealt with at the household or village levels, as there are numerous small-scaled environmentally friendly wastewater treatment systems and composting toilets in the market. Rules should easily permit dry composting toilets and greywater systems while restricting wasteful activities like flushing toilets with potable water or washing down cow sheds twice a day when a simple long-handled scraper can be used, as is done in many other countries. The less water going in for treatment or sprayed back on paddocks, the better for everyone and the environment.

### **Stormwater management**

13. Driveways and low traffic roads and parking lots with many small drain holes that allow grass to grow and water to soak into soil are also much better for groundwater recharging and reducing flood and drought damage.
14. Wetlands really need to be highlighted as one of, if not the best way, to not only store and slowly release rain water and storm-water run-off in times of drought or flood but also to treat wastewater. We need to greatly increase the protection and restoration of all wetlands, big or small.
15. There is merit in Option 4, if adequate finance could be found, perhaps in part earmarked from the proposed sale of leasehold Waitara land. This would enable improvements in the Waitara stormwater systems and possibly the installation of a major water tank, to increase storage capacity and provide another water supply in case of emergency. A covered emergency water supply protected from ash would also be invaluable in the event of minor volcanic eruptions<sup>10</sup>.

### **Issue 2 – Zero Waste**

16. We fully support the goal of Zero Waste by 2040.
17. However, we have reservations in all 4 options proposed by Council.
18. To achieve Zero Waste and enhance resource sustainability, there needs to be rules such as banning plastic shopping bags, and other measures to encourage, if not ensure, that industries and businesses minimize packaging and single use bottles, cups, plates, cutlery and straws. The 4 options do not mention such rules and incentives.
19. To give some examples, container deposit and product stewardship schemes need to be put in place, as well as support for initiatives like the cloth nappy trials for early childhood centres<sup>11</sup> in Auckland City and Return to Earth composting of pallets and Boomerang Bags. A large-scale return to glass milk, dairy and yoghurt bottles would have a huge impact on waste minimization. It would also create local jobs necessitated by the decentralised infrastructure changes necessary from farm to processor to store shelf.

20. We would like to support Option 1 but do not have sufficient details to fully support it. Our questions include the following:
21. Where would the weekly kerbside food waste collected go ultimately? Would it be turned into compost for sale and use in Council gardens? We suggest alternative options such as supporting home and small business composting that would not require long-range transport and large-scaled infrastructure systems – just hand out recycled-plastic compost bins at a cost of about \$30 a household along with educational booklets, online videos and free community workshops. Support may also be provided for medium-sized businesses such as hotels and restaurants for their food waste processing (e.g. Biobin<sup>12</sup>) after salvageable foods have been retrieved (e.g. Kai Rescue<sup>13</sup>) to benefit those in need. Support for locally grown foods and community gardens would also have multiple benefits in health, education, waste reduction and lowered fossil fuel dependency.
22. What would be the level of business/industry financial contribution to the ‘Commercial and Industrial Recycling facility’? Funding for such a facility should be largely coming from businesses as they are responsible for generating the wastes in the first place, and there could be business innovation opportunities as well.
23. How much of the \$8.7m operational expenditure proposed will be actually allocated for community groups to conduct zero waste education and on-ground projects?
24. The Ministry for the Environment’s current (May 2018) round of the Waste Minimisation Fund focuses on circular economy projects<sup>14</sup>. This could be another funding source for Council’s Zero Waste programme.
25. Council itself needs to go Zero Waste in earnest. It is necessary that all management staff complete the NZ Zero Waste Academy course.
26. Council’s Infrastructure Strategy noted that the existing Colson Road landfill is expected to reach capacity in 2019 and a new regional landfill is being developed in Eltham. We do hope that the new landfill will be designed to capture the methane generated for energy production, as is being done at a number of landfills<sup>15,16</sup> and even wastewater treatment plants<sup>17</sup> elsewhere in NZ. This would then be a good demonstration of ‘zero waste’ in action.

### **Issue 3a – Flagship Projects**

27. Option 4 – Invest in other Flagship Projects or Option 5 – Do not invest in Flagship Projects, are our preferences.

#### **Just transitions and new opportunities**

28. In April this year, the central government made a historic announcement<sup>18,19</sup> of no new offshore oil and gas exploration permits and restricting new permits to only onshore Taranaki over the next three years. While Taranaki has been “*one of the most important mineral producing regions...*” the government has signalled an end to further exploration and a beginning to transition away from fossil fuels.
29. Central government also recently announced plans<sup>20</sup> to improve freshwater quality across New Zealand, via the setting of nutrient input targets from agriculture, particularly focused on industrial dairying and the reduction in stocking rates and fertilizer inputs. As Taranaki’s other major industry, this new policy direction will likely have significant cascading impact that will need to be addressed. Although nutrient and other pollutant discharges are mainly the responsibility of Taranaki Regional Council (TRC), the District Council plays a critical role in land-use planning. We recommend that Council work with TRC and stakeholders to facilitate the necessary transition to low input, regenerative farming. This will ultimately deliver higher profits to Taranaki farmers, while reducing pollution and enhancing water quality.

30. The Productivity Commission (April 2018) pointed out that, *“A low-emissions transition requires land-use change... New Zealand will look very different in 2050. During the transition, action to mitigate GHG emissions will require real and significant changes. Those changes will have disruptive impacts on some businesses and households... it will require extensive economic transformation and restructuring.”*
31. The Tapuae Roa Make Way for Taranaki Action Plan (April 2018), involving ngā iwi o Taranaki and the Taranaki Mayoral Forum, states *“As a region and as a nation we are facing monumental challenges such as limits to natural resource use. For example, the new Government is taking us down a path of addressing climate change and the quality of the fresh water in our rivers and waterways. Development of our region has to be seen in the context of such national priorities.”*
32. The Action Plan focuses on eight areas, three of which refer to the transformation of the energy, food and visitor sectors, while the fourth takes *“a fresh look at directions for participation of Māori and iwi in the economy”*. Together they form the so-called *“Four Futures”*. Of these, the central government has committed spending from the Provincial Growth Fund<sup>21</sup> to support the Taranaki Crossing Experience (\$13.34m), New Energy Development Centre business case (\$100,000), H2 Taranaki Hydrogen Road Map (\$50,000), Future Foods (\$175,000), and Maori Education and Enterprise Stocktake (\$100,000).
33. We do have serious reservation over the disproportionately high level of funding allocated for the Taranaki Crossing to stimulate tourism, as we expressed in our recent submission on the Taranaki Regional Council’s Draft Long-term Plan<sup>22</sup>.
34. We also have serious concerns over the New Energy Centre and Hydrogen projects. The Action Plan describes the so-called ‘Energy Future’ as this: *“The vision for the future is to have strong, secure and sustainable energy and petrochemical industries, but also to be an exporter of renewable energy, new energy ideas, solutions and technologies... At the heart is a New Energy Development Centre promoting development in clean energy technology and practice... the development of Taranaki as a hydrogen centre. Hydrogen is a clean energy carrier and storage medium for renewably generated electricity, and can be used for zero emission transport.”* But H2 is only as clean as the energy source and methods used to produce it. Critically, most H2 is created through ‘cracking’ which involves splitting up the methane molecule (CH4) found in natural gas<sup>23</sup> which would have been accessed by fracking in Taranaki. We fear that these two projects have been designed to prolong fossil fuel mining, with known environmental and social harm. Any follow-up implementation would require hugely expensive and risky investments, when there are already other proven technologies for low-emission transportation and renewable energy alternatives.
35. The Council of Trade Unions expressed<sup>24</sup> recently that, *“We need to respect the contribution that people working in New Zealand’s fossil-fuel industries have made to developing the goods, services and modern way of life we rely on today. How we demonstrate this respect is ensuring workers have a full transition plan that maps the move to new secure, well-paying jobs, recognises existing skills and supports retraining, and provides financial support to protect people’s quality of life.”*
36. In view of the above, CJT is of the view that Council could look at investments which augment or complement the central government funded Future Foods and Maori Education/Enterprise Stocktake projects, specifically to enable skill audits, training and transfer of local workforce, such as that from the fossil fuel industry, to truly clean energy, sustainable agriculture and food production, and other innovations. Rather than pushing hard on productivity and profitability, environmental sustainability and animal welfare also need to be ensured. We advocate moving away from centralised, industrial dairying to decentralised and more sustainable models; e.g. Agro food forestry<sup>25</sup>, Polyface<sup>26</sup> and Biological farming<sup>27</sup>, Regenerative agriculture<sup>28</sup> and Happy Cows biz<sup>29,30</sup> model.
37. To further support just transition and the uptake of renewable energy technologies, we ask Council to consider requiring new homes to be built to meet certain energy efficiency standards which would minimize energy demand and facilitate the adoption of photovoltaic and smart-grid technologies. Rate

rebates and other incentives may also be considered for households and businesses that have achieved energy conservation and transitioned onto sustainable energy. There may also be building requirements to reduce damage from natural disasters; e.g. roof screws (rather than nailing) may offer better security when hit by a tornado<sup>31,32</sup>.

### **Active and Low-emission Transport**

38. The Government Policy Statement on Land Transport 2018-2028 gives a great deal of emphasis on safety, reduction of private car use and support for mode shift to active and low emission transport. In addition to reducing GHG emissions, these also have public health benefits and help to create liveable cities that value public space and improve access.
39. The Council's Infrastructure Strategy also identifies the *"Increased expectations of quality, and footpath and cycleway infrastructure"* as one of the three key transportation issues.
40. We therefore ask Council to consider investing further in transport, roading and landuse planning and development that ensure safety and access for walkers, cyclists and public transport users.
41. Electrification of the Council fleet and funding for public charging stations would also offer impetus and leadership – another potential flagship project.
42. If Council decides to redevelop the TSB Stadium as planned (Option 1), we suggest that it be done so that the stadium could be used as a reliable and effective emergency shelter in case of disasters, with its own water supply/storage and power (the huge roof area would be ideal for installing solar panels).

### **Issue 3b – Funding for Flagship Projects**

43. We are strongly against the proposal to develop and sell land from Peringa Park Recreational Reserve or any other statutory reserves.
44. Reserves Act 1977 section 17(1)<sup>33</sup> states that recreation reserves are *"for the purpose of providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for the protection of the natural environment and beauty of the countryside, with emphasis on the retention of open spaces and on outdoor recreational activities, including recreational tracks in the countryside."*
45. We understand that the land was gifted to Council for Reserve purpose only<sup>34</sup>. The Conservation Act 1987 section 4 also requires the Act to give effect to Treaty of Waitangi. We find the proposed revocation of its reserve status, developing it for sale to generate profits and calling it 'recycling land' disturbing and disrespectful to the original owners of the land and potentially a breach of the Treaty of Waitangi. If revocation goes ahead, it'd set a bad precedent with far reaching impacts, causing doubts and mistrust on anyone who may otherwise consider gifting land for public good.
46. Depending on the nature of the chosen flagship project, funding could come from a combination of fees and charges (from polluters and users), business contribution, central government, debt and increased rates.
47. With increasing frequency and intensity of extreme weather events caused by climate change, resulting in serious damage and disruption to infrastructure and services, there needs to be financial resilience to cope with disasters, repair and rebuild. We therefore would urge on caution and prudence and avoid funding overly extravagant projects of doubtful or little public benefits.

### **Additional comments**

48. Future planning should also focus on coastal erosion. A recent government report titled *Our Land 2018*<sup>35</sup> warned, *"Rising sea levels and related storm surges will increase the frequency, severity, and extent of coastal flooding and erosion, while also threatening low-lying infrastructure, cultural sites, and*

*habitats. They may also increase the risk of seawater intrusion to groundwater.” We urge that Council formulates a clear strategy for a staged retreat from the coast in some areas to minimize disruption. This strategy should also help guide the planning for all future housing or other developments near the coast.*

49. We find the submission form to be biased with leading questions rather than an opportunity to seek community views based on objective information.

---

<sup>1</sup> Climate Justice Taranaki website: <https://climatejusticetaranaki.wordpress.com/>

<sup>2</sup> Dale, Gareth, 27/03/2012. The growth paradigm: a critique. International Socialism – a quarterly review of socialist theory. <http://isj.org.uk/the-growth-paradigm-a-critique/>

<sup>3</sup> New Plymouth District Council, 2018. Infrastructure Strategy 2018-2048. <http://www.newplymouthnz.com/-/media/NPDC/Documents/Have%20Your%20Say/10-Year%20Plan%202018/Supporting%20Information%20-%20Infrastructure%20Strategy.ashx?la=en>

<sup>4</sup> Tapuae Roa – Make Way for Taranaki Action Plan, 6 April 2018. <http://www.makeway.co.nz/media/1028/tapuae-roa-action-plan-6-april-2018.pdf>

<sup>5</sup> New Zealand Productivity Commission, April 2018. Low-emissions economy Draft report.

[https://www.productivity.govt.nz/sites/default/files/Productivity%20Commission\\_Low-emissions%20economy\\_Draft%20report\\_FINAL.pdf](https://www.productivity.govt.nz/sites/default/files/Productivity%20Commission_Low-emissions%20economy_Draft%20report_FINAL.pdf)

<sup>6</sup> Government Policy Statement on Land Transport, Draft of 14 March 2018. <https://www.transport.govt.nz/assets/Uploads/Multi-Modal/Documents/Draft-GPS-2018.pdf>

<sup>7</sup> Helen Harvey, 27/04/2018. New Plymouth’s multi-million dollar water plan questioned. <https://www.stuff.co.nz/taranaki-daily-news/news/102979394/new-plymouths-multimillion-dollar-water-plan-questioned>

<sup>8</sup> Kapiti Coast District Council, 21 April 2011. Operative stage for Plan Change 75 – Water demand management.

<https://www.kapiticoast.govt.nz/contentassets/224584fb884e4d7e9fba8cf055044fb7/21-april/1013-08-kcdc-or-operative-stage-pc75-water-demand-management-sp-11-191.pdf>

<sup>9</sup> Climate Justice Taranaki, 16/03/2018. Feedback on Draft New Plymouth District e-Plan.

<https://climatejusticetaranaki.files.wordpress.com/2018/05/cjt-feedback-on-draft-new-plymouth-district-eplan-16mar2018-full.pdf>

<sup>10</sup> Living in the shadow of Taranaki’s ticking time bomb, 15/10/2016. <https://www.stuff.co.nz/environment/85239689/Living-in-the-shadow-of-Taranakis-ticking-time-bomb>

<sup>11</sup> Auckland Council website, accessed 8/05/2018. Join a community programme – Cloth nappy trial for early childcare centres (ECE).

<https://www.aucklandcouncil.govt.nz/environment/what-you-can-do-for-environment/Pages/join-a-community-programme.aspx>

<sup>12</sup> Biobin website, accessed 8/05/2018. <http://biobin.net/>

<sup>13</sup> Nelson Environment Centre – Kai Rescue, accessed on 8/05/2018. <http://www.nec.org.nz/kai-rescue/>

<sup>14</sup> Ministry for the Environment website, accessed on 7/05/2018. May 2018 funding round of the Waste Minimisation Fund.

<http://www.mfe.govt.nz/more/funding/waste-minimisation-fund/how-apply-waste-minimisation-fund>

<sup>15</sup> Pipe dream: Trapped gas to power homes, 23/01/2018. <https://www.stuff.co.nz/national/100773378/pipe-dream-trapped-gas-to-power-homes>

<sup>16</sup> Pioneer Energy website, accessed 7/05/2018. Omarunui Landfill Gas. <http://pioneerenergy.co.nz/projects-and-partnerships/sustainable-cities/project-case-study-2/>

<sup>17</sup> Bioenergy Association website, accessed 7/05/2018. Clarke Energy. <https://www.bioenergy.org.nz/clarke-energy>

<sup>18</sup> RT Hon Jacinda Ardern, 12/04/2018. Planning for the future – no new offshore oil and gas exploration permits.

<https://www.beehive.govt.nz/release/planning-future-no-new-offshore-oil-and-gas-exploration-permits>

<sup>19</sup> Government aims to strike balance ending offshore oil exploration: PM, 12 April 2018 <https://www.stuff.co.nz/business/103031705/ardern-to-end-to-offshore-oil-exploration-with-short-reprieve-for-taranaki>

<sup>20</sup> Environment Minister admits some dairy farmers may have to reduce cow numbers under tough new waterway pollution rules, TVNZ 6/05/2018. <https://www.tvnz.co.nz/one-news/new-zealand/environment-minister-admits-some-dairy-farmers-may-have-reduce-cow-numbers-under-tough-new-waterway-pollution-rules>

<sup>21</sup> Taranaki set for \$20m provincial growth fund injection, 6/04/2018. One News.

<sup>22</sup> Climate Justice Taranaki, 6/04/2018. Submission on Taranaki Regional Council Draft Long-Term Plan 2018/2028.

[https://climatejusticetaranaki.files.wordpress.com/2018/04/cjt-submission-on-trc-longterm-plan-2018\\_28-final.pdf](https://climatejusticetaranaki.files.wordpress.com/2018/04/cjt-submission-on-trc-longterm-plan-2018_28-final.pdf)

<sup>23</sup> Stecher, Nicolas, 25/10/2017. Are Hydrogen cars the next big thing... again? <http://www.thedrive.com/tech/14431/are-hydrogen-cars-the-next-big-t>

<sup>24</sup> Unions Ready to Start a Just Transition to Low Carbon Economy, 27/03/2018. <http://www.union.org.nz/unions-ready-to-start-a-just-transition-to-low-carbon-economy/>

<sup>25</sup> Chapter 5 – Agro-forestry, a new fashion of old tradition? <http://www.fao.org/docrep/u2246e/u2246e06.htm>

<sup>26</sup> Polyface farming at Mangarara Station, this NZlife. <http://thisnzlife.co.nz/polyface-farming-mangarara-station/>

<sup>27</sup> Down to earth: the benefits of biological farming, 6/10/2017.

<https://www.radionz.co.nz/national/programmes/countrylife/audio/201861458/down-to-earth-the-benefits-of-biological-farming>

<sup>28</sup> Regenerative agriculture, 18/07/2017. <https://thestandard.org.nz/regenerative-agriculture/>

<sup>29</sup> The Happy Cow website, accessed 8/05/2018. <http://www.thehappycow.biz/>

<sup>30</sup> Nature Matters Milk Company website, accessed 8/05/2018. <http://www.naturematters.co.nz/>

<sup>31</sup> Mum’s horror as tornado forms before her eyes and tears town apart, 10/04/2018. Taranaki Daily News. <http://www.stuff.co.nz/taranaki-daily-news/news/102964828/Mums-horror-as-tornado-forms-before-her-eyes-and-tears-town-apart>

<sup>32</sup> Tornado in New Plymouth days after damaging storms, 12/04/2018. Taranaki Daily News. <https://www.stuff.co.nz/taranaki-daily-news/news/103068981/reports-of-tornado-in-new-plymouth-days-after-damaging-storm>

<sup>33</sup> NZ Government Reserves Act 1977. Section 17 Recreation reserves.

[http://www.legislation.govt.nz/act/public/1977/0066/latest/DLM444605.html?search=ts\\_act%40bill%40regulation%40deemedreg\\_reserve\\_rese1\\_2\\_5\\_a&p=8](http://www.legislation.govt.nz/act/public/1977/0066/latest/DLM444605.html?search=ts_act%40bill%40regulation%40deemedreg_reserve_rese1_2_5_a&p=8)

<sup>34</sup> Karen Venables on the Hokonui Breakfast Show with Bryan Vickery, 1/05/2018.

<https://www.facebook.com/HokonuiTaranaki1/videos/1700994266651093/UzpfSTewMDAwMDYwMzc5Mzk4MDoyMTI2NTkzMTg3MzcwNzg3/>

<sup>35</sup> Ministry for the Environment and Stats NZ, April 2018. New Zealand’s Environmental Reporting Series: Our land 2018.

<http://www.mfe.govt.nz/sites/default/files/media/Environmental%20reporting/Our-land-2018.pdf>