

# Taranaki Regional Long-Term Plan 2024-2034

## Climate Justice Taranaki submission, 12 April 2024

### Introduction

1. Climate Justice Taranaki (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 increasingly impact present and future generations' inalienable rights to safe water, food, and shelter, crucial to sustaining livelihoods and quality of life. Composed of a broad range of people with varied expertise and life experiences, CJT has engaged respectfully with government on numerous occasions.
2. CJT appreciates the opportunity to submit on the Taranaki Regional Long-Term Plan (hereafter referred to as the LTP). While our submission focuses on four of the six key issues identified by Council, all issues are intrinsically linked. With the increasing challenges we face, environmentally, socially, politically and economically at multiple levels, it is important to seek solutions that create synergies and co-benefits, rather than to accept trade-offs.

### Improving resource management – Spatial planning

3. CJT agrees that the development of a regional spatial plan would be very useful in guiding resource management, infrastructure development and coordinated planning across the four Taranaki councils.
4. Spatial planning is also important in identifying and safeguarding areas for community and social wellbeing and resilience into the future, including green and open space, public infrastructure and services, community hubs, local food production and rewilding for environmental and cultural wellbeing. These deserve much higher priorities than privatising land and natural resources for economic development, especially involving extractive industries like fossil fuel and mineral mining.
5. A climate lens is required in spatial planning to allow for adaptation and retreat and to avoid adding risks to communities and infrastructure, as climate disruptions become more intense, frequent and unpredictable.
6. A regional spatial plan for Taranaki must include the Coastal Marine Area (CMA). In the 184 paged supporting document for the LTP, there is only a single mention of 'Coastal Marine Area', in relation to public access and enjoyment of natural areas. Yet there are existing and emerging pressures on the CMA. These include additional adverse effects on coastal ecosystems, biodiversity, threatened species and fisheries from potentially fast-tracked seabed mining<sup>2</sup> and offshore wind energy development both within the CMA<sup>3</sup> and in the EEZ<sup>4, 5</sup>. Offshore wind energy development will require major extension of Port Taranaki.

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<sup>1</sup> <https://climatejusticetaranaki.info/>

<sup>2</sup> <https://www.manukaresources.com.au/site/pdf/a1409ad6-23ed-483d-9da2-2d0b52072f6b/Taranaki-Project-invited-to-apply-under-NZ-Fast-Track-Bill.pdf>

<sup>3</sup> <https://wqz.co.nz/>

<sup>4</sup> <https://www.bluefloat.com/bluefloat-energy-energy-estate-and-elemental-group-partner-to-develop-offshore-wind-farms-in-new-zealand/>

<sup>5</sup> <https://oceanenergy.com/projects/new-zealand-offshore-wind-farm/>

## Delivering on freshwater – Enhanced implementation

7. The Council must implement the National Environmental Standards, National Policy Statement for Freshwater Management, and the freshwater farm plans regime, to meet Council's legal and statutory obligations.
8. Beyond those mentioned above, Council should submit to the central government for a much lower nitrate level standard in drinking water, as part of Council's advocacy for the interest of the region, especially rural communities. In 2019, the Science and Technical Advisory Group recommended a dissolved inorganic nitrogen bottom line of 1 mg/L to protect the quality of drinking water and the ecological health of waterways<sup>6</sup>.
9. In 2021, Public Health Communication Centre Aotearoa warned<sup>7</sup>, *“Recent studies linking nitrate levels as low as 0.87 mg/L NO<sub>3</sub>-N (from here on simply mg/L) in drinking water to bowel cancer have raised public concerns over nitrate contamination.<sup>1-3</sup> Our recent study of the current nitrate levels in NZ drinking water showed as many as 800,000 people could be on water supplies with nitrate above 1 mg/L. These nitrate levels are far below the current drinking water nitrate limit of 11.3 mg/L set by the World Health Organization (WHO). The WHO limit is only designed to prevent death from methaemoglobinaemia in infants. Thus, the current nitrate limit does not account for the potential links to cancer or other adverse health outcomes.”* Further studies have found nitrate above 5 mg/L increased the odds of preterm birth substantially.
10. To address the worsening problem of nitrate in freshwater which threatens human, animal<sup>8</sup> and ecological health, Council needs to strengthen its consent monitoring and enforcement regime as well as education and advocacy efforts in encouraging farmers to phase out urea fertiliser, lower stocking rates and transition onto diverse regenerative agriculture<sup>9</sup>. Riparian planting is good but not enough to address the nitrate problem. Effectively addressing this would also reduce greenhouse gas emissions from nitrous oxide and methane and help to address climate change.
11. More extensive and scientifically sound environmental data monitoring of waterways, including coastal and wetlands, is also needed. We therefore support option 2 for 'enhanced implementation with additional value-add activities'.

## Addressing climate change

12. Indeed, Council has a vital role in identifying risks from climate change on people and ecosystems and preparing for adaptation. In addition to sea level rise and flooding risks, Council also needs to consider risks from mega storms and winds, coastal erosion, marine heatwaves and ocean acidification.
13. In terms of climate mitigation, providing and promoting affordable and efficient public transport is the best thing Council could do. Collaborating with district councils to enable safe active transport would further reduce the reliance on private cars. On-demand public transport and shared community EV fleets can provide cost effective and flexible support for reducing transport emissions, especially for rural communities. Reducing Council's transport emissions by optimising vehicle use

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<sup>6</sup> <https://www.tandfonline.com/doi/full/10.1080/20442041.2024.2335738>

<sup>7</sup> <https://www.phcc.org.nz/briefing/nitrate-contamination-drinking-water-and-adverse-birth-outcomes-emerging-evidence>

<sup>8</sup> <https://www.farmersweekly.co.nz/news/deaths-prompt-nitrate-warning/>

<sup>9</sup> <https://www.calmthefarm.nz/case-study-1>

and phasing over to electric would also help. Avoid committing to any new non-essential infrastructure build such as stadiums and sports centres which are costly in emissions and finance.

14. CJT proposes an option 4 – focus on a regional risk assessment and adaptation plan, while increasing support for communities to raise emergency and hazard preparedness.
15. We are concerned that there is no obvious budget increase for flood protection and hazard management and very little increase for transport over the ten years, as presented in the graph on page 21 of the consultation document.

### **Protecting indigenous biodiversity**

16. We propose an option 3 – provide significant additional biodiversity support for community groups, hapū, iwi and landowners to engage in biodiversity work, and strengthen various regional plans, rules and their enforcement to increase protection and restoration of indigenous biodiversity and ecosystems.
17. Community initiatives can be highly effective, if given adequate support and guidance where needed. E.g. Wild Taranaki's role in facilitating collaborations among groups has been much appreciated, and of course continued programs for possum and predator control are essential.
18. Wetlands and the coastal marine areas warrant greater focus and support in research, monitoring and management (See point 6 above). Working more closely with the Department of Conservation, local community groups and hapū / iwi would enhance effectiveness and grow positive relationships.