

Tasman Environment Plan

Feedback from the Nelson Tasman Climate Forum December 2022

Introduction

This feedback is based on the documentation provided by the TDC, and on the webinar held with TDC staff on 22 November 2022. The NTCF recognises and appreciates the efforts made by TDC staff to engage directly with us in this process.

This feedback is focused on major, high-level region-wide issues and topics. We look forward to continued engagement with TDC on detailed aspects of the TEP as the planning process continues through 2023/4.

General comments

The TEP attempts to manage long-term “development” within the context of the region’s environment, but lacks an overarching vision or goal. Agreement on this would help to guide both Council and community through the complex sets of issues and options that the discussion document raises. The forthcoming Natural and Built Environment Act states the purpose of the Act (Clause 3) and has a definition of te Oranga o te Taiao (Clause 7) that the TEP needs to uphold. A possible simple goal or vision statement based on this could be to “**Enhance ecosystem health and resilience across the region**”. Or to ensure “**net restorative outcomes**”. This will also provide a benchmark for evaluating policies, strategies, regulations, rules, activities and developments.

The NTCF strongly supports

- the 100-year planning timeframe of the TEP;
- the priorities listed on p3 of the Significant Resource Management Issues and Options paper, including recognition of the need to operate within the region’s biophysical limits, and to “enhance, restore and protect natural and built environments”. These fit well with the goals proposed above;
- the principles detailed on p5 of the same paper, including recognition of public good, as this is key to our future well-being.

It is not clear how the TEP will integrate the many (currently) separate sectorial issues and options into a coherent and cohesive whole. For example, it is vital that urban development, transport and infrastructure plans are compatible with Te Taiao, the natural world (biodiversity, freshwater management etc). These latter issues/options reports are not yet available and so cannot be commented on in relation to those being consulted on here. It is crucial that Te Taiao issues are not relegated to secondary status compared to those that are more advanced in the planning process.

The discussion documents appear to reflect a “business as usual” mindset that does not adequately reflect the scale of the climate crisis, and the urgency of mitigation and adaptation. Radical lifestyle change is coming whether we like it or not, and the TEP, with its appropriate 100-year timeframe, needs to reflect this – in the short and longer term. The NTCF is especially concerned with the focus on growth *per se*, which is not compatible with a sustainable future for the natural environment, including the people who depend on it. We realise that this is an exceedingly tough issue for Council, but it cannot be relegated to the “too hard” basket, especially in a long-term plan such as this. This is

an opportunity to rectify the short-term thinking that governs the recently approved Future Development Strategy, especially as regards land use.

The NTCF supports the proposal to have climate change included in each of the relevant RPS significant issues. However, this significant issue should have its own section (or a separate Climate Change issues and options paper) that includes targets and plans for monitoring of progress. As an example, Greater Wellington Regional Council has set a benchmark for Aotearoa regional policy statements climate change provisions (<https://www.gw.govt.nz/your-region/plans-policies-and-bylaws/updating-our-regional-policy-statement-and-natural-resources-plan/regional-policy-statement-2022-changes/>). This includes specific emission reduction targets in line with a 1.5 degrees Celsius climate warming limit so that net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced by 50% from 2019 levels by 2030, with specific targets for land transport and public transport emissions, and increases in active travel/public transport mode share, for reaching net zero by 2050.

Achieving these ambitious yet necessary targets will also require significant lifestyle shifts (behaviour change) at individual/household levels, and in the ways that businesses operate. The TEP should include support to long-term behaviour change campaigns/movements that will catalyse these shifts, as they complement the top-down policies and regulations of local and national government.

We note that many of the policies and actions proposed here (e.g., active transport, greening of urban areas) will also improve people's well-being. On top of this, climate anxiety is becoming an increasingly salient mental health issue, especially for youth. The TEP should recognise the value of effective climate change mitigation actions, especially those where the local community can actively participate, as having additional mental health benefits.

During the 100-year planning timeframe of the TEP, some major disruptors will arise. In some cases these are already incipient. These will be detailed in a later section of this feedback, and should be considered across the various sectorial issues and options under discussion.

Detailed feedback on key topics/issues

Transport

- Develop targets for emissions reductions and active/public transport take up, compatible with 1.5C climate warming, the policies/regulations/plans to achieve them, and monitoring to track progress.
- As climate conditions progressively deteriorate (cyclones, storms, floods, landslips, fires) develop and clearly communicate policies on how these will affect the capacity of Council to invest in maintaining (or not) existing roading infrastructure, especially for outlying settlements.
- As outlined in the new active transport strategy, decrease the investment required in new infrastructure by implementing campaigns aimed at changing peoples' behaviour.

Infrastructure and Energy

- Ensure the natural hazards being considered include those arising from climate change such as increasing temperatures, flooding, droughts, sea level rise etc, as well as earthquakes (a serious risk to infrastructure and energy for the region)¹.
- Aim to become self-sufficient in renewable electricity generation at pace, through actively encouraging investment in existing and evolving technologies – solar, wind, tidal, co-generation. The TEP could set a target date achieving for this.
- Policies should encourage renewable generation at local/community and household level as well as by utilities, with the objective of achieving self-sufficiency/resilience at regional level, and within individual urban areas/communities, and to reduce the need for network-level infrastructure investment.
- Investigate potential for local renewable energy generators to be supported (private, community- owned etc).
- Ensure adequate EV charging infrastructure across the region, to cope with the challenges of low population density and long distances between settlements.
- Work with the community to enhance energy and water use efficiency, reduce consumption and energy waste (e.g., home insulation) and thus the demands on energy and water infrastructure.
- Make it easy and cheap to make Earth-friendly decisions and hard/expensive to make unsustainable decisions.

Rural areas

- Rural Zone 3/CTA: strongly support option 2 as absolutely essential for the future of the region beyond 2050.
- Ensure that productive land is not swallowed by urban sprawl (*See urban section*).
- Give high priority to wilding pine removal, and to maintain those areas already cleared free from return of pines. Review the noxious plants listing, with a view to upgrading (from unwanted to noxious) and improve enforcement.
- Further encourage/incentivise native plantings and ecological restoration in rural landscapes by private landowners (e.g., riparian margins, biodiversity corridors, eradication of invasive pests – both animals and plants), while recognising that, due to climate change, restoration may not return a habitat to its prior state.

Coastal and freshwater environments

- The plan needs much stronger emphasis on freshwater and coastal ecosystems under climate change.
- It should provide incentives for people to shift from the coastal fringe as soon as possible to allow coastal ecosystems to migrate and expand inland. It is imperative to avoid “coastal squeeze’ of these ecosystems because they provide protection against storm surges and act as major carbon stores. Thus, coastal ecosystems need room to extend inland, bigger buffers with urban developments, and healthy waterways to deliver high quality water to ensure their health.
- Rivers and waterways need room to flood, and require minimum flows to maintain ecosystem health even in dry conditions (droughts), so limits on water extraction and on flood plain developments are critical.

¹ o Note that climate change impacts can be considered as man-made hazards, not natural ones

- Develop policies around stranded public and private assets as sea levels rise, to ensure their relocation/removal while minimising carbon emissions and costs to ratepayers.

Urban areas

- The region needs a long-term approach that retains as much productive land as possible, and limits urban sprawl. The quarter-hour paradise objective of “a vibrant urban community where residents have everything they need within a 15-minute walk, scoot or cycle from their warm, affordable home” could be adopted as a planning goal (see <https://quarterhourparadise.nz>).
- Plan for 100-year life of houses that are relocatable in coastal and flood plain locations (raising floor levels is not sufficient).
- Commercial buildings in flood risk areas need to be levied up front for removal/relocation costs to avoid this falling back on ratepayers by default.
- Start planning now for new rural villages and developing nodes, with public transport links.
- Urban areas need more land set aside for reserves and parks, and especially with native species (trees etc.) to encourage urban biodiversity (including birdlife).
- Regulate to ensure all buildings are as energy efficient as possible, affordable and sustainable (i.e., not MacMansions).
- Mandate light colour roofs to reflect heat, and cost-efficient water harvesting etc.
- Regulate or incentivise the installation of solar energy as standard on all new properties, and the use of solar energy from properties for charging EVs.
- Prevent solar panels on properties being shaded out by large neighbouring buildings.
- Develop policies and spatial planning guidelines to support community gardens/orchards and other community-friendly facilities.
- Ensure rural villages are accessible to **all** in the community, not just those with deep pockets.
- Integrate rural villages with iwi aspirations, allowing iwi to reconnect with whenua in meaningful ways.
- Progress the TDC draft domestic cat management regulations, to minimise their negative impacts on biodiversity. Consider cat-free zones in areas that border reserves and sensitive habitats and encourage adoption of cat runs, cat enclosures and other measures to keep cats within property boundaries.

Long-Term Disruptive issues

To allow for and actively encourage maximum resilience over a 100+ year timeframe in a rapidly changing world, it is necessary to identify major disruptive changes that may well occur in that timeframe. This is a natural part of the proposed new TEP climate change issue. Some of these are:

- Relocalisation and intensification of our communities. This applies to both urban and rural communities and will influence businesses, shops and employment, and schools, and will require lowering of vehicle speed limits, encouragement of walking and cycling and creation of low traffic neighbourhoods.
- Retreat from sea level rise, river flooding and areas where access roads may be permanently disrupted by heavy rainfall on unstable land. This requires identifying land where people and businesses can retreat to.
- Plan for a relocation of major regional infrastructure that is currently located in vulnerable coastal locations at or close to sea level, especially where sea level rise is compounded by

land subsidence – the regional airport is the obvious example; Best Island sewage works is also in this category. Airport relocation will require a site with space for associated commercial, industrial (and residential?) areas, and with appropriate topography and weather conditions.

- The effects on the region of temperature rises in excess of 1.5C. Current global Nationally Determined Contributions will produce a temperature rise of around 2.7 C relative to pre-industrial levels, which is about twice the global warming we have already experienced. The TEP needs to plan options that cover this future scenario, as well as the now less likely 1.5C increase. In addition to major sea level rise and river flooding, this will impact on land stability from rainfall, periodic droughts, the ability of the region to grow different crops, and the arrival of new pests and diseases. Fires, particularly in pine forests and manuka/kanuka areas, may have serious impacts in this region. All these issues need to be considered individually, and in the location of related communities.
- The effects of climate change (temperature, water availability etc.) on the indigenous ecosystems, agriculture/horticulture and all living beings in the region.
- Renewable energy generation and the effects of reduced EROI (Energy Return on Investment) on patterns of power use.
- Major changes in patterns of food production due to dietary changes (e.g., plant-based diets) and technological innovation (e.g., precision fermentation, see: <https://www.theguardian.com/commentisfree/2022/nov/24/green-technology-precision-fermentation-farming>).
- Large scale national and international migration forced by climate change impacts.

Although unrelated to climate change, another very disruptive event will be the Alpine Fault rupture. Scientists predict there is a 75% chance of the rupture in the next 50 years, with an 80% chance it will be Magnitude 8.2. Nelson city can expect Magnitude 7.

Many of these issues are very challenging, because they are leading us into a very different world. Yet our current emissions trajectory is taking us directly into this world. Failure to think these changes through will create a very poor future for our children and grandchildren, and for all living beings.

Continued Engagement with TDC

This feedback is necessarily high-level and incomplete. The NTCF has significant expertise that can be brought to bear on many of these issues and challenges. We propose to work constructively with TDC staff in 2023/4 as the TEP progresses, to maximise the value of the TEP as a planning tool for Council and communities in the future. Our members are keen to contribute to working groups where we have relevant expertise (for example Energy/Infrastructure, Transport, Urban Development, Coastal and Freshwater, Biodiversity). The TDC representatives on the NTCF Leadership Group will be key to ensuring that this contribution can be effectively and efficiently deployed.