

## Nelson City Council: Long Term Plan 2024 – 2034

### Submission Prepared by:

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### **Introduction**

As the Nature and Climate Group of the NTCF, we have applied a climate change and biodiversity lens to the Long Term Plan (LTP) and the supporting Draft Council Activities Summaries document.

### **Key Principles**

In order for Council to effectively and equitably administer the district over the coming decade and beyond, we believe there are fundamental principles which need to be recognised. Some are self-evident and built into every Council policy and strategy, others are less widely integrated into Council thinking. All are important:

- Key requirement for prudent and wise use of financial and non-financial resources;
- Requirement to deliver appropriate Council services to ALL residents, equitably and effectively;
- Need to adapt to a rapidly changing operating environment, including changes in legislation, and advances in technology;
- Urgent need to address the climate crisis, including significantly decreasing greenhouse gas emissions, adapting to the impacts of climate change, and protecting the environment (including all indigenous biodiversity and ecosystems) within we which we live.

It is this last principle that will be addressed through our feedback in this submission.

### **Beyond the Storm: General**

#### Climate Change

It is significant that the very first paragraph of the Mayor's foreword (page 4) focuses glowingly on Nelson's natural environment, climate and recreation opportunities in parks. And yet protecting, enhancing and restoring the environment, climate and parks in the face of a rapidly changing climate gets very limited mention in the remainder of the document. Climate change is the biggest risk facing Council and the community over the period of the LTP, and must be front and centre of all Council thinking, of all Council business, and of all Council interactions with the community.

The reality is that we are not "beyond the storm", metaphorically or figuratively. The 2022 event was one in what will be come an increasingly frequent, severe and extensive series of "storms" that will disrupt our lives in the decades to come unless we act now, with urgency, to make deep, deep cuts in emissions of greenhouse gases and adapt to our changing climate. This is the challenge for the Council and community.

#### Indigenous Biodiversity and Ecosystems

We note further in the Mayor's foreword (page 4), his statement that "*A city doing nothing goes backwards and we want to be progressively improving our facilities*".

While we acknowledge the importance of maintaining infrastructure for the safety and wellbeing of Nelson's human population, it also needs to be acknowledged that constant progress and human 'development' has had, and continues to have, an inevitably negative impact on indigenous biodiversity and ecosystems, across the environment. Yet as humans, we rely on the multitude of services provided by these ecosystems for our long term health and wellbeing, and we damage the environment at our peril.

Council's own 'Community Outcomes' document lists as its first outcome: '*Our unique natural environment is healthy, protected - Ko tō tātou taiao e hauora ana, e tiakina ana*'. This goal needs to be embedded front and centre in the Council's LTP.

Council's greatest responsibility to the community is to ensure that the environment is healthy. Yes the provision of infrastructure is important, as noted by the Mayor ...'*the provision of vital city infrastructure for services such as drinking water, wastewater, stormwater, roads, stopbanks, drains, bridges, cycleways and footpaths*', but without a healthy environment and a stable climate, all the infrastructure in the world will not save us.

The Council needs to begin to acknowledge the long-term environmental and biodiversity costs of 'progress', both in terms of fiscal costs and from the perspective of quality of life, and to minimise those costs at every turn, while working to restore and repair past damage.

Any development projects that Council undertakes are likely to impact biodiversity. These impacts need to be identified, and mitigation strategies put in place to reduce or eliminate harm.

In addition to its Climate Action Plan, Council needs a Biodiversity Plan, building on the Biodiversity Strategy. Given that Nelson City and Tasman District are contiguous biodiversity areas, it is imperative that the two Councils work jointly on biodiversity and ecosystem planning and management. Together they need to undertake a joint biodiversity risk assessment that is incorporated into planning processes and project development. Taking the health of ecosystems and biodiversity as the starting point puts their preservation and restoration at the top of the agenda.

#### Urban Greening Plan

We are disappointed that there is no reference to Council's Urban Greening Plan 2022 in the LTP consultation document nor the Draft Council Activities Summaries document. Its absence appears to be a major oversight and we advocate that the Plan be incorporated into the LTP process.

The outworkings of the Plan would 'expand our urban canopy, bringing more CO<sub>2</sub> absorbing plants and trees into our city centre while reducing air and noise pollution, supporting biodiversity and food resiliency'. As the Plan notes: 'urban greening is widely recognised as playing a critical role in increasing the health and wellbeing of individuals and communities living in cities and towns'.

"Urban greening practices like living walls and roofs (where plants grow directly on the structure), accessible community gardens, expanded urban tree canopies and urban microforests have been shown to improve air and water quality, absorb carbon emissions, reduce the impact of climatic change, enhance biodiversity, and support economic development.'

#### Botanic Gardens

We also advocate an expansion of the Urban Greening Plan to include the development of a Botanic Garden for the district, in conjunction with TDC, with a potential location in Saxton Fields.

Many New Zealand cities have Botanic Gardens, and one only needs look to Hamilton to see how effective they can be as a tourism destination, an educational resource and a highly valuable amenity for all the community.

We would like to see the absence of such an important resource for the Nelson/Tasman community rectified. A key component would be the development of an indigenous biodiversity area, with other benefits, including potentially research into the implications of climate change on our local flora and fauna. The fantastic growing climate locally provides an excellent opportunity to develop a garden complex, and could draw on the skills of the Horticulture department at NMIT in its planning and development.

The development of Botanic Gardens locally will provide an education resource for the public, creating greater understanding of the importance of different types of trees, shrubs and other flora, a relaxing and pleasant recreational space for locals and tourists to improve their mental and physical well-being, opportunities for building the further greening of Nelson City, and carbon sequestration.

#### Building Community and Environmental Resilience

We urge Council to work with the community to build food security by resourcing and supporting the development of more community gardens and garden allotments, and for householders to grow more backyard produce and fruit trees.

We urge Council to integrate effective revegetation into its flood protection works. Indigenous biodiversity plays a vital role in estuaries, wetlands, flood plains, riparian areas, streams, rivers, gullies and ridge lines in reducing flooding, erosion and sediment loss.

This includes protecting Nelson's water catchments through enhancing, restoring and protecting permanent indigenous forest. There are a number of ways this can be achieved, with the Miyawaki microforest method of densely planted peak tree species one option that has considerable potential in some areas.

We recommend that Council expands its native plant nursery to develop a scheme to provide low-cost indigenous plants to the Nelson community.

We urge Council to instate nature-based solutions to climate risks as these will be more effective in the long term. For example, with the rate of sea-level rise increasing faster than previously expected, combined with sinking land, sea walls are unlikely to be cost-effective. In contrast, managed retreat by allowing coastal and estuarine ecosystems to move inland will result in enhanced biodiversity outcomes, increased carbon sequestration and increased protection of inland assets over time.

We also urge Council to ensure that all climate change predictions and modelling, including rates of sea level rise, are based on the most up-to-date data available, with IPCC AR6 more reliable than IPCC AR5.

We urge Council to ensure that funding for improving park assets should also include increasing resourcing for indigenous plantings. There is a wide range of research that confirms the increased mental wellbeing of people when able to easily access trees and green spaces. Treed green spaces with accessible walkways can improve the wellbeing of a wide range of people in our community – not just the fit and active, unlike sports fields.

Increasing tree cover across our urban areas is also a critical means of reducing the heat island effect, whereby incoming radiation is unable to escape due to hard surfaces and other factors of urban design. This results in increasing temperatures at street level, potentially to uncomfortable or dangerous levels. Trees not only provide essential shade, but cool the immediate environment through transpiration.

#### **Beyond the Storm: Specific**

##### 1. Rates Affordability

As we do not pay rates as an entity, we do not feel we can support any particular option.

However, we do have feedback on some of Council's proposals outlined in the three options.

##### *Parks contracts (page 14)*

We are extremely concerned that at a time when a healthy environment is even more critical than ever, that Council is proposing to effectively cut funding to Parks through capping contracting budgets. We believe this a backward step that will not only have ramifications for biodiversity in parks but also for community wellbeing.

We suggest ways for Council to save money on park maintenance could include:

- reducing areas planted with annual species and replace them perennial species (focusing on indigenous species) that require little maintenance;
- reducing or replacing non-recreational grassed areas with native shrubs and ground cover species to eliminate mowing (decreasing both costs and carbon emissions), reduce weeding costs and aid ecological restoration;
- increasing tree and shrub cover more generally in parks to reduce mowing and weeding costs.

*Weed control programme (page 15, and page 87 of Activities Summary)*

It is somewhat difficult to know exactly what Council is proposing in this item, as Beyond the Storm gives the impression that the proposed cut to the weed control programme in landscape reserves is actually a delay of programme expansion by a year. This would result in a small change that is likely to have relatively limited ecological impact.

In contrast, the Activities Summary states that the proposal is to decrease funding by deferring the implementation of ecological restoration plan measures, with the funding to be increased by \$500,000 in 2028/29 and 2029/30. This indicates that there will be a deferral period of four years, before priority weed control will commence in these areas.

In each case, the savings to be banked are forecast at \$720,000.

We are concerned at any proposed reduction in weed control, particularly where it relates to undertaking ecological restoration, and allows known weeds to proliferate uncontrolled for four years. We believe the cost savings of a mere \$720,000 over ten years are insignificant against the potential harm of not doing the required weed control work as quickly as possible. Delaying weed control is likely to exacerbate the problem and potentially to increase ecosystem stress, and may end up costing Council far more in the long term.

We need our ecosystems to be as healthy as possible, and reducing weed burdens is a key component of maintaining ecosystem health.

We urge Council to cut the funds from other areas, not from weed control and not from parks contracts.

*Decreased air quality data reporting (page 14)*

We believe that resourcing environmental activities must be considered a priority for the long term wellbeing of all of our communities. To this end, we would encourage Council not only to monitor PM<sub>10</sub> levels, but also to include PM<sub>2.5</sub> levels. These smaller particles penetrate into the lungs and can cause serious health issues.

We note that PM<sub>2.5</sub> emissions from vehicles are a major problem in urban centres. Monitoring of air quality at congested road transport locations around Nelson would allow vehicle pollution to be taken into account in decisions relating to transport infrastructure and policy development in Nelson.

As the frequency of data reporting currently is not provided in the documentation, it is difficult to comment on the wisdom or otherwise of Council's proposal to decrease the regularity of reporting.

*Operating funding for climate change strategic planning (page 16)*

It appears from the details provided in Option 1, that Council's preferred Option 2 will result in the decrease of operating funding to climate change strategic planning in the infrastructure activity.

This is not acceptable. As outlined at the beginning of our submission, climate change is the most important threat facing Council and the community during the next decade. Reducing funding, particularly to the planning of long term projects such as infrastructure projects, is madness in the extreme. We do not understand nor support it.

## 2. Buy-out of slip-affected properties

We support Council in Option 2, while recognising that this is a very complex matter.

Where Council does engage in buying out of slip-affected properties, we advocate that those properties are planted with indigenous trees, shrubs and other species, with experts providing guidance on revegetation and restoration options for each site. One option may be intense revegetation with larger tree species, using the Miyawaki microforest method. However, comprehensive analysis of geology, hydrology, geotechnical and other factors will be required to ensure the right revegetation techniques and species are employed.

Proactive Council purchase and revegetation of properties likely to be at risk of slips and erosion will reduce the likelihood of further land slippage in those localities over the longer term, and help stabilise neighbouring areas. Concomitant benefits include increase habitat for native fauna and other biodiversity benefits.

## 3. Council's forestry approach

We support Council in Option 2, with caveats.

We believe the 'Right Tree, Right Place' taskforce undertook a very thorough and comprehensive assessment of Council's forestry portfolio in 2023, and we applaud it.

We endorse all their recommendations (1 – 19), with two exceptions:

- recommendations 6 and 11.

Our concerns around these two points are that they assume that the current commercial forestry stands should be transitioned to tall-tree, closed-canopy forest communities. We don't not accept this as a given, but urge Council to seek expert ecological advice as to the best vegetation community to be established in each part of the current forestry estate. In many areas, tall-tree forests will be appropriate but in some areas, shrublands or grasslands maybe more ecologically appropriate.

We also urge Council to ensure that all new plantings across areas currently in commercial forestry are planted with permanent, biodiverse, indigenous species, appropriate to the site.

We specifically urge Council not to plant exotic species in any areas currently in commercial forestry as weed issues are already problematic enough across Nelson's 11,000+ ha of parks and reserves. Wilding conifers are likely to be problematic in and around the ex-forestry areas for decades to come and unless the focus is on restoring indigenous species, additional weed issues will develop.

Council has a responsibility to the community to restore the indigenous biodiversity and ecosystems of Council-owned land for the myriad of benefits that will accrue – long term carbon sequestration, improved habitat for flora and fauna, healthy waterways, and the list goes on.

If Nelson truly wants to be known as a forest city, then let's make sure that our forest is as beautiful, unique and precious as only our indigenous forests can be.

## 4. Marina CCO proposal

We are not able to determine which of the three proffered options is the most appropriate.

However, we do wish to note that marinas, as receiving locations for a high frequency of international vessels, act as 'hot-spots' for invasions of marine pests that can be very detrimental to our marine and coastal ecosystems, and very difficult to eradicate or control. The disturbed and modified habitats found in marinas and harbours provide ideal opportunities for non-native species to invade, and many are highly invasive due to their competitive traits.

Any increase in the number of berths and associated usage of Nelson Marina will put increased pressure on Nelson's near-shore marine environment, with the potential for fuel spills, sewage and toxic discharges. There is also likely to be additional pressure on fish and other populations, and species diversity in the harbour and beyond. Before any expansion is contemplated, we urge Council to undertake a comprehensive evaluation of the environmental and biodiversity impacts.

Regardless of which option Council chooses to go with, we believe that Council needs to maintain its oversight of the Marina into the future, to ensure any negative environmental and biodiversity impacts are minimised.

#### 5. Housing Reserve Fund changes

We support Council in Option 2, as we believe that there is an urgent need for suitable accommodation options for our vulnerable and highest need residents.

We suggest Council partners with housing providers such as Habitat for Humanity and Simplicity Living to maximise the outcomes of the Housing Reserves Fund.

We also urge Council to ensure that the criteria for new and existing applications to the Housing Reserve Fund incorporate appropriate aspects of the Urban Greening Plan (as outlined above) and Water Sensitive Urban Design (WSUD) principles (outlined below), as well as the highest energy efficiency standards.

#### 6. All-weather sports turf

We support Option 1 of retaining the current approach to sports field management.

The proposed artificial turf venue proposed is a prime example where biodiversity and other environmental issues need to be prioritized over human recreation in project decision-making. Artificial turf normally lasts approximately 8 to 10 years in ideal conditions with continual break down of microfibres: *'microplastic shedding is in the hundreds of pounds per year per acre'...*

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10262297/>

[https://www.healthandenvironment.org/assets/images/webinarimages/Artificial%20Turf%20Q&A\\_FINAL.pdf](https://www.healthandenvironment.org/assets/images/webinarimages/Artificial%20Turf%20Q&A_FINAL.pdf)

Plastic sheeting and the fibres seal over the soil, resulting in low oxygen to the living soil below and is often toxic to invertebrates. In contrast, while large grass areas are not at all ideal in terms of biodiversity, they do help to maintain a healthy soil ecosystem that helps to capture carbon.

We advocate for the use of the Urban Greening Fund to plant indigenous species on the perimeters of existing sports fields, where practicable.

We also advocate for a thorough analysis of Council's sports ground usage to determine which current sports fields are no longer essential, and can be replanted with indigenous flora to help restore our indigenous biodiversity and provide planted, accessible recreation areas for the wider population, including sporting and non-sporting community members.

#### 7. Tāhunanui Beach facilities

We support Council in Option 2, with one caveat.

We acknowledge that the Surf Lifesaving Club provides an essential service to swimmers at Tāhunanui Beach, and some upgrade of the club's facilities is due. However, we do not endorse building new facilities on the beach itself. Any new facilities must be appropriately and sensitively located, with regard to both the fragile beach ecosystem and the inevitability of substantial sea level rise.

It is essential that the biodiversity of the beach foreshore is not further undermined by construction projects. In addition, given the inevitability of substantial sea level rise, the Council would be better to resource further rewilding of as much of the Tāhunanui Beach foreshore as possible, rather than investing in infrastructure.

#### 8. Arts Hub

We support Council in Option 2.

#### **Draft Council Activities Summaries**

Climate change is mentioned as one factor in some of the activity areas described. But the extent to which it is mentioned and addressed is very superficial at best. There appears to be little analysis of alternatives that will decrease emissions and adapt to a rapidly changing climate. Instead, "Business as Usual" is the predominant approach taken.

It is particularly disappointing that in "Challenges" section of the "Environment" chapter (page 66), the only mention of climate change relates to increased biosecurity risks and the impacts of sea level rise on marine and coastal environments (including, presumably, the Waimeha Estuary?).

There is no analysis, nor even a mention of the likely impacts of climate change on the indigenous biodiversity and ecosystems for which Council are responsible. This is a significant oversight and one that should be rectified urgently. We urge Council to include analysis of the risks to indigenous biodiversity and ecosystems and appropriate steps to address those risks in the list of priorities for the next three years (page 67).

Again, in the Parks and Active Recreation chapter, climate change barely rates a mention, with its only impact under "Challenges" (page 86) being damage to park infrastructure from storm damage. Where is the awareness of the multitude of impacts a rapidly changing climate is having and will increasingly continue to have on the indigenous biodiversity and ecosystems contained within the "11,250 hectares of parks and reserves, including over 10,000 hectares of conservation reserve" managed by Council???

Changes in minimum and maximum temperatures, changing rainfall patterns, increasing frequency of droughts, increasing frequency of storms, sea level rise, increased storm surges, changes in biosecurity risks – all of these will impact detrimentally the biodiversity and ecosystems for which Council is responsible. We urge Council to include analysis of the risks to indigenous biodiversity and ecosystems and appropriate steps to address those risks in the list of priorities for the next three years (page 87).

We applaud Council for its commitment to "Adopt and implement a Climate Change Strategy and update and action the Climate Change Plan" under their "Corporate" activities, buried on page 102 of the Summary document. We urge Council to prioritise this implementation and to ensure that the Strategy and Plan permeate all aspects of Council business, with real and tangible actions that address the climate crisis meaningfully. We look forward to seeing strong and effective mitigation and adaptation measures implemented throughout all of Council in the coming months.

However, we are a little puzzled by the assertion on page 8 of "Beyond the Storm" that "*Since the baseline year of 2017/18 Council has reduced its operational emissions by 89%, driven significantly by reductions in landfill emissions through infrastructure upgrades such as capturing methane and flaring.*" How does this fit with the data provided in the table on page 105/6 of the Summary document that Council's emissions in 2017/18 were 72,904 t/CO<sub>2</sub>? Can we conclude that annual

emissions from all Council business and activities therefore now are 8,019 t/CO<sub>2</sub>? If this is the case, that is a good win. But if emissions have declined by 89%, then to what does the 21% target in the table refer? Regardless of the answer to that question, we urge Council to make deep cuts in emissions and to quantify those annual cuts in the table in Years 1, 2 and 3 by including percent reduction figures in the table.

Across all sectors, we urge Council to be more proactive in the face of a rapidly changing climate in implementing both mitigation and adaptation measure and make a number of suggestions.

- Transport:
  - design/implement innovative community programmes to encourage people out of cars and instead using active and public transport;
  - work with TDC on effective car-pooling schemes and/or car co-ownership schemes, prioritising electric vehicles.
- Water and Stormwater:
  - design/implement innovative community programmes to encourage people and businesses to use less water;
  - encourage rainwater collection from private homes, businesses and public buildings for garden watering and outdoor cleaning;
  - encourage water recycling of grey water in private homes, businesses and public building for garden watering and outdoor cleaning;
  - work with developers and within Council activities to increase the extent of permeable surfaces in new developments and facilities, to minimise stormwater flows from impermeable surfaces;
  - mandate the incorporation of effective nature-based detention systems for stormwater such as wetlands, rain gardens etc;
  - mandate the implementation of appropriate Water Sensitive Urban Design (WSUD) principles in both new builds and in retro-fitting.
- Flood Protection:
  - do not allow development on any areas that are flood-prone, floodplains or where the intersection of sea level rise and flood events will exacerbate flooding;
  - ensure that all riparian, floodplain and wetland zones associated with all waterways are effectively and extensively planted with appropriate native species.
- Solid Waste:
  - increase the current waste reduction per capita target from 10% to 50%;
  - design/implement innovative community programmes to encourage people and businesses to waste less;
  - please also refer to our section on food waste, below.
- Environment and Parks and Active Recreation:
  - undertake extensive analysis of the risks posed by climate change to indigenous biodiversity and ecosystems;
  - develop and implement effective strategies to mitigate these risks to ensure that indigenous biodiversity and ecosystems are thriving in the face of a rapidly changing climate;
  - mandate an 80% survival metric for plants at two years after planting in the Performance Measure table on page 90;
  - please also refer to our section on funding for weed control, above.

### **Other Comments**

#### Recreational access to Ngāti Koata whenua in the Maitai Valley (page 41)

While the ongoing development of recreation trails in the Maitai Valley is supported, their construction and maintenance need to be mitigated by further revegetation in the new areas for trail development noted in the Plan. The Council needs to acknowledge the intrinsic value of our indigenous flora and fauna; not simply how it can be 'used' by the human population.



We support Council, in conjunction with iwi, exploring the option of the Maitai River as having legal personhood; similar to the Whanganui River.

Further residential development in the Maitai River catchment needs to be abandoned to protect and restore biodiversity, and to help reduce the impacts of flooding and erosion downstream.

Given the very high likelihood of further major flood events in the Nelson catchment, proactively reducing flood and erosion risk through permanent indigenous plantings needs to be a priority.

#### East-West cycleway link (page 41)

We strongly urge Council to invest in this initiative to increase active transport options for the community, with all the concomitant benefits. We urge Council to continue to increase and upgrade its entire cycleway network and walking path network to facilitate as much active transport as possible.

#### Kitchen waste (page 43)

Rotting waste food (putrescibles) currently makes up ~17% of waste to the joint NCC and TDC York Valley landfill, but contributes ~30% of greenhouse gas emissions from the landfill. Reducing food waste is a very straightforward and practical way to reduce emissions.

We strongly support the retention of the Council's food waste initiatives, with a strong focus on reducing food waste through public education on food wastage reduction options, food banks, and curb-side food waste recycling. Efficient food waste composting by Council could both provide a useful source of compost for planting initiatives and a source of income to the Council.

We urge Council to bring forward the budget provision for this initiative from the 2027/28 year to the 2024/25 year, particularly as the funding to undertake this programme does not come from rates but from central and local government levies.

We see this as an easy climate win with positive benefits for households as well, in reduced food and rubbish costs, and allows Council to demonstrate both its climate credentials and willingness to address cost-of-living pressures. Win-win!

A Eunomia report gives an example of a household that uses 78 rubbish bags per year (1.5 per week) at a cost of \$375 per year. If they reduce this to one bag per week (52 per year) as a result of organic waste being collected separately (as organic waste makes up one-third of domestic waste on average), this would result in household savings of \$124.80 per year based on a bag price of \$4.80.

#### Financial planning (page 46)

We strongly advocate that the 'Environment' operating funding budget be expanded from 10% to at least 15%, and that it specifically includes in its mandate the restoration and protection of Nelson's indigenous biodiversity and ecosystems. Environmental issues have been confirmed by Nelson's population as a priority – that needs to be reflected in budget allocations.

#### Te Tiriti partnerships

It is vital partnerships with local iwi must be strengthened and their kaitiaki (guardianship) role in protecting biodiversity is acknowledged by the Council and restored. Resourcing already overstretched local iwi to play their vital kaitiaki role needs to be a priority.

#### Adopt-a-Spot initiative

Council currently has around 40 community volunteer groups managed under the Adopt-a-Spot programme, who undertake an immense amount of valuable volunteer conservation work (trapping, weed clearance etc). The programme has been closed to new interest/groups, due to staffing capacity.

We urge Council to increase the current 0.5 FTE coordination position to 1 FTE, and that the programme be reopened to new groups, with a stronger emphasis on restoration initiatives.

Funding for regional climate and environmental initiatives

We support both the continuation and the extension of funding for climate and environmental initiatives by Council, and request that a collaborative funding model with TDC be established to ensure that Top of the South environmental initiatives are coordinated effectively and efficiently.

Specifically, we request that the invaluable coordination and development work by the Nelson Tasman Climate Forum not only continues to be funded, but more resources made available to the organisation to fulfil its vital role, as per the NTCF submission to the LTP.

We also support continued and increased funding for the Kotahitanga mō te Taiao Alliance, Tasman Environment Trust and the Environment/Recovery Centres.