

12 May 2020

2021-31 Long Term Plan consultation  
Otago Regional Council  
Private Bag 1954  
Dunedin 9054

Tēnā koutou,

### **SUBMISSION ON THE OTAGO REGIONAL COUNCIL'S 2021-31 DRAFT LONG TERM PLAN**

1. The Dunedin City Council (DCC) welcomes the opportunity to submit on the Otago Regional Council's 2021-31 Draft Long Term Plan.
2. The DCC appreciates the support and partnership of the Otago Regional Council (ORC) on matters of shared responsibility and interest. The DCC looks forward to continuing to work closely with the ORC for the benefit of Dunedin, its residents and ratepayers.

#### **Climate Change**

3. The DCC is encouraged to see the ORC recognising climate change as an issue of international importance, recognising the importance of emerging national direction, and that the ORC will be considering climate change in everything the ORC does.
4. The DCC strongly agrees that working together in partnership and being proactive are key to effectively responding to climate change, across both mitigation and adaptation activities. The DCC welcomed the release of the ORC's Otago Climate Change Risk Assessment report in March, and views this as a good first step in terms of identifying the risks climate change presents across the region and to help inform collective response.
5. There is no mention of a plan to develop and implement climate change action plans in the next 10-year period, with the proposed performance measure only relating to information sharing and collaboration on climate change. The DCC suggests the ORC consider including the development and implementation of action plans with an explicit target date (or dates).
6. In Dunedin's case, collaborative planning and action to address climate change risk is already well underway. The DCC values the ORC's partnership on the South Dunedin Future programme, working closely with the local community on ways to adapt to the climate challenges facing South Dunedin. While collaboration on these projects is crucial to their success, this needs to be done in a way that ensures ultimate decision-making sits with the responsible governing body.
7. The DCC acknowledges that there are still many gaps in information in understanding climate change risks, their impact and the range of possible future scenarios for Dunedin. The DCC supports further research to address gaps in information and will continue to collaborate closely with the community, ORC, central government and others to determine how we best plan and respond in a way that will safeguard the wellbeing of the Dunedin community. While this long

term planning is underway, the DCC plans to spend about \$37 million over the next decade, reducing South Dunedin's flood risk.

### **Pest and biosecurity management**

8. The DCC, along with the ORC, is a core funder of the Predator Free Dunedin (PFD) collective comprising 22 organisations. The DCC and ORC are working together to achieve a predator free status over 31,000 hectares, as part of the Predator Free New Zealand 2050 vision adopted by the Government in 2016.
9. The DCC is delivering one of the three PFD projects - the City Sanctuary Project. The project area is 8,300 hectares of land and reaches out to 32,000 residents. The core model of this project is to support the urban Dunedin residential community to control possums, rats and mustelids on their private property as well as conduct pest control operations throughout DCC's urban reserves. The current partnership with the ORC has allowed PFD to cohesively engage with landowners and support them to implement best practice pest control on their properties as well as manage the delivery of pest control on public-land.
10. The DCC is encouraged by increased efforts from the ORC to enable native biodiversity to thrive as well as maintain healthy ecosystems. The DCC shares the view that resourcing needs to be increased if we are to collectively achieve Otago's objectives in biosecurity and biodiversity.
11. The DCC supports 'Option 1 Cost: \$4.6 million from year 1 onwards' so the DCC can continue to build momentum in pest control via comprehensive education, engagement and technical support. A delay in financial and technical support to the Predator Free movement may lead to a backwards step in the significant progress already achieved by site-led initiatives (e.g. possum eradication on the Otago Peninsula and possum suppression to below 2% Residual Trap Catch Index in the Mount Cargill sector). Resourcing is already limited to supporting landowners and community groups to effectively implement predator control. The additional resourcing in Option 1 would allow the DCC to strengthen efforts and outreach within the urban area of Dunedin City. Moreover, the DCC considers that all of the delivery outcomes listed in Option 1 are priorities and that an immediate and significant 'circuit breaker' option is warranted to achieve the objectives of the Regional Pest Management Plan.
12. The DCC is pleased to see that both Option 1 and 2 show commitment to continuing partnerships to maintain gains achieved in pest control projects to date.
13. The DCC is supportive of 'Option B: Regional Targeted Rate' to fund pest management, for larger landowners to contribute more towards biosecurity costs.

### **Balancing the budget**

14. The DCC supports 'Option 1 Increase total rates to achieve an immediate and sustainable funding source for our operational expenditure'. The DCC considers ORC rates have been insufficient to fund the work needed.

### **Environment**

15. In 2016 the DCC adopted Te Ao Tūroa – The Natural World, Dunedin's Environment Strategy 2016-2026. Te Ao Tūroa takes a partnership approach to delivering on the city's environment ambitions to facilitate and secure a healthy environment now and into the future.

16. The Strategy's implementation is overseen by Te Ao Tūroa Partnership, of which the ORC is a member, and is tracked against several environmental indicators including those that the ORC is legislatively responsible for monitoring, including air, soil and water quality. The DCC encourages continued monitoring of these indicators and welcomes ORC input into more robust reporting of these indicators as part of Te Ao Tūroa Strategy. The DCC is currently reviewing its strategic framework and will work with key partners as this work progresses.

## **Land and water**

17. The DCC supports increased investment in monitoring and environmental studies, including the proposed establishment of new monitoring programmes in estuaries and coastal waters and the proposed expansion of the current freshwater monitoring network.
18. Given the extensive use of Otago's coastal waters for recreation, the DCC encourages the ORC to incorporate monitoring of coastal water quality in line with contact recreation guidelines into the new programmes. In terms of freshwater monitoring, the DCC encourages the ORC to collect more urban water quality data in line with the vision, goals and methods of the ORC's Urban Water Quality Strategy 2017. The DCC is also investing in increased water quality monitoring and would welcome the opportunity to continue to work together with the ORC on developing monitoring programmes.
19. The DCC supports the renewed focus on water quality improvement works in Tomahawk Lagoon indicated in the draft Long Term Plan and through the ORC's recent approval of a draft outline management plan. The DCC would welcome the opportunity to work together with the ORC on improving water quality in the lagoon: urban Dunedin's regionally significant wetland. The DCC suggest the ORC consider funding options for water quality improvements in Tomahawk Lagoon.
20. The DCC is interested in the reference made to transitioning towards an integrated catchment management model. However, further details are needed about an equivalent for the coast (e.g. shoreline management planning that will be informed by the district-wide coastal hazard screening that the ORC and DCC are currently collaborating on).
21. The DCC looks forward to working with the ORC on changes to the current Regional Plan: Water, and on the development of the new land and water regional plan and Regional Policy Statement. The DCC sees these policy and plan development processes as opportunities to provide clear direction to three waters service providers that provides for all four aspects of present and future community well-being: environmental, cultural, economic and social.

## **Biodiversity**

22. The DCC would like the ORC's Long Term Plan to reflect that a National Policy Statement for Indigenous Biodiversity (NPS-IB) is due to be gazetted in 2021 and that identification of significant natural areas (SNAs) is a major component. The provision of technical support for the identification of SNAs in Otago is required (regardless of the timing of the NPS-IB) and the DCC recommends this is listed in the Biodiversity section of the plan.
23. In implementing the NPS-IB, integration of biodiversity protection and restoration first into farm support programmes and farm environment plans will be key method. The DCC would prefer the ORC Long Term Plan reflects that these methods will be required in the short-term, rather than the medium-long term focus of the current wording in the Biodiversity section.

24. The DCC supports an update to the biodiversity strategy and ORC holding hui on biodiversity. The DCC suggests the ORC consider including dates for an update of the biodiversity strategy and hui in the plan.

## **Air**

25. The DCC does not support pausing work in this area and encourages learning from the work of other councils (e.g. Environmental Canterbury and Nelson Regional Council). Air quality has been successfully improved through working with the community to step-up the quality of their burners and what they are burning. Otago has five out of the six urban areas with the worst air quality in NZ, most areas are improving but there is still a significant amount of work to be done in Otago.
26. The DCC suggests that more support is needed for households where the air quality regularly exceeds the standards. The DCC suggests re-introduction of the rates tariff that can then be used for education and subsidies.
27. The DCC suggests that the list/requirements of non-compliant burners should be updated to allow households that are eligible for Warmer Kiwi Homes subsidies for heating to be able to replace their burners if needed via this scheme. The Energy Efficiency and Conservation Authority that manages the Warmer Kiwi Homes scheme will allow the heating subsidy to be used for any eligible household if the ORC recognises that their current burner is non-compliant.
28. The DCC believes that the location of monitoring in Dunedin does not represent areas of the city that could suffer from poor air quality during heating season. The DCC encourages additional monitoring in potential problem areas such as North East Valley and Leith Valley. The National Institute of Water and Atmospheric Research have shown that air quality can vary significantly between different parts of towns.

## **Safety and resilience**

29. The DCC supports the priorities of drainage control, river management and flood protection and supports the ongoing work on coastal erosion and inundation risk.
30. The DCC supports the ORC undertaking a performance review of the Lower Taieri Flood Protection scheme in 2021-2024. The DCC encourages the ORC to consider the impacts of stormwater from urban expansion in the lower Taieri catchment in its review, including development around the Silverstream, Owhiro Stream and scheduled drains. The DCC would welcome the opportunity to work together with the ORC to ensure the scheme is functioning appropriately to protect the entire community it services, including urban areas such as Mosgiel, Wingatui and Outram.

## **Transport**

31. The DCC supports the aim to improve accessibility to transport, reduce the impacts of transport on climate change, improve urban environments and public health and reduce deaths and serious injuries. The DCC also supports the goal of public transport being used more often as a preferred mode of travel, to contribute positively to our environment and communities. This is aligned with the DCC's strategic goals and will be critical to achieving Dunedin's Zero Carbon by 2030 goal.

32. The DCC again highlights its position of seeking the transfer of ownership of Dunedin's public bus service from the ORC to the DCC and would like the ORC Long Term Plan to include a consideration for the transfer. The DCC believes this would enable improved transport solutions for the Dunedin community and further progress Dunedin's ambition to be Zero Carbon by 2030.
33. The DCC notes that Year 4 'transport' budget includes \$3.2M for the move to a national public transport ticketing solution. The DCC requests greater clarity about what the national public transport ticketing system will deliver that has not already been achieved by the 2020 launch of Bee Card.
34. The DCC asks for clarification of the ORC budget allocation to implement changes that will result from the Regional Public Transport Plan review. The DCC also notes mention of funding for the Wakatipu Way To Go programme business case work, but not for the Shaping Future Dunedin Transport Business Case work. The DCC would like assurance that funding is being included for both work programmes.
35. The DCC supports increased budget for transport investment (from \$28.808M in 2020-21 to \$46.328M in 2030-31), however the DCC requests further clarity about how this money is to be allocated (other than \$3.2M for the move to a national public transport ticketing solution in Year 4).
36. The DCC seeks clarification that the ORC has included provision for improvements to public transport in Dunedin as part of the Shaping Future Dunedin Transport programme, as well as clarity about how the development of a regional approach to speed management has been resourced in the regional transport planning function.
37. The ORC can significantly contribute to continuing to build integrated tracks/trails using assets such as stop/flood banks and access to areas of biodiversity. These activities contribute to the region and Dunedin's goals of increasing more sustainable transport options and encouraging healthy and active communities. The DCC encourages the ORC to investigate and work with local authorities to open up areas where tracks/trails could be developed to link into a wider integrated active transport and recreation network for walking and cycling.
38. The ORC draft Financial Statements include \$580,000 for depreciation of transport assets, but no transport related assets are referred to in the ORC draft infrastructure strategy. The DCC would like clarity on what transport assets this depreciation refers to.
39. The ORC draft Revenue and Financing Policy identifies Waka Kotahi NZTA grants as being for the provision of public transport. The DCC understands these grants are also contributing towards planning work and Total Mobility. The DCC recommends these descriptions be reconsidered, including recognising the regional transport planning function as an activity.
40. The Transport section of the Revenue and Financing Policy contains a minor error that would be good to review. It references the Transport Services Licensing Act 1989 which was repealed in 2009. Functions of regional councils in relation to registration of commercial public transport services now sit in part 5 of the Land Transport Management Act 2003.

#### **Resource Management Act (RMA) reform**

41. The DCC notes that staff have been working on the government's RMA reform agenda and encourages the ORC to continue to work collaboratively on region wide work in this area.

## **Regional leadership**

42. The DCC is strongly supportive of the ORC's investment in regional leadership, particularly in partnering with Kāi Tahu and in community engagement. Consistently successful engagement with iwi Māori results in better decision making, more robust and lasting solutions and more engaged people and communities. The DCC is also moving towards a future where it will be business as usual for our staff to view council work through a Māori responsiveness lens. The DCC is committed to growing our partnership with mana whenua through considered collaborative engagement as befitting a true partner.

## **Other**

43. The DCC asks that the ORC initiates a public discussion about the role of Chalmers Properties in supporting the city/region, and that this specifically includes consideration of free holding land for the purpose of encouraging development.
44. The DCC also supports moves to a new suite of level of service measures, an annual customer satisfaction survey and utilising best practice in community projects.

## **Concluding remarks**

45. Thank you for the opportunity to submit on the ORC 2021-31 draft Long Term Plan.
46. The DCC wishes to speak to this submission.
47. If the ORC would like to clarify any of the issues raised in the submission, please do not hesitate to get in touch.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Aaron Hawkins', with a stylized flourish at the end.

Aaron Hawkins  
**Mayor of Dunedin**