

24 April 2020

Draft Annual Plan  
Otago Regional Council  
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Tēnā koutou

#### **SUBMISSION ON THE OTAGO REGIONAL COUNCIL DRAFT ANNUAL PLAN 2020/21**

1. The Dunedin City Council (DCC) welcomes the opportunity to submit on the Otago Regional Council (ORC) Draft Annual Plan 2020/21.
2. The DCC appreciates the support of the 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.
3. The DCC acknowledges the unexpected challenges presented by the unfolding COVID-19 crisis and requests the ORC reconsider rate increases for Dunedin residents. The DCC acknowledges the importance of ORC activities and obligations as an environmental regulator and requests consideration of using financial reserves if necessary, to offset the need for large rates increases.

#### **For a safe, resilient future**

4. The DCC welcomes the ORC's focus on climate change resiliency in the ORC's 2020-21 Annual Plan and looks forward to future partnership work.
5. The DCC acknowledges progress made through partnerships between the ORC, DCC and others on work to prepare for climate change in Dunedin. The DCC is particularly grateful for the continued collaborative work on the South Dunedin Future work programme and for the ORC's work on monitoring and modelling of stormwater and groundwater in the South Dunedin area.
6. The DCC also acknowledges crucial collaboration to date on the Ministry for the Environment South Dunedin case study, which will be invaluable to ensure the best outcomes can be achieved for residents.

7. The DCC supports all work that will assist in planning for the effects of sea level rise and coastal hazards more generally. In particular, the DCC supports the ORC's regional climate change risk assessment project as a crucial step forward for the region to better understand how Otago can adapt to the impacts of climate change.
8. The DCC commends the ORC's commitment to assess CO<sub>2</sub> emissions for the Otago region, and to measuring its own emissions. Since 2013/14, the DCC has been measuring and reporting its corporate emissions, through the Toitū carbon reduce programme. Since 2015, Dunedin City has been a signatory to the Global Covenant of Mayors and has, as part of this commitment, completed a citywide inventory of greenhouse gas emissions; conducted a climate change vulnerability assessment; and is reviewing forward work programmes to align with Dunedin's commitment to become a net carbon zero city by 2030.
9. The DCC also encourages the ORC, as owner of Port Otago, to assess emissions from ships visiting the region with a view to regulation. During cruise ship season emissions from berthed ships, and the resulting air quality, likely has a detrimental effect on those living in the immediate vicinity of Port Otago. The DCC requests that the ORC monitors these emissions and air quality more stringently with regular reporting to DCC and the West Harbour Community Board. The DCC does not support the Port itself being solely responsible for monitoring and reporting emissions.
10. As transport is the source of over half of the city's non-agricultural emissions, the DCC seeks to work closely with the ORC to deliver on this target. The DCC shares the ORC's commitment to exploring options to incentivise car-free, low emissions travel. Specific comments relating to investment in public transport planning and operations are set out below.

#### **Better urban environments**

11. The DCC supports further collaborative work and believes the joint approach taken for incorporating natural hazard risks into the 2GP serves as a good model for future collaboration to support the management of urban development capacity. The DCC particularly appreciates the input of ORC science teams in providing a strong foundation for land-use planning done by the DCC.
12. The DCC has identified a shortage of capacity for residential growth over the medium and long-term and is currently working on addressing this shortage. As part of this work, the DCC would welcome input from the ORC on the impacts of growth options on environmental matters managed by the ORC.
13. The DCC supports the national policy direction and ORC's objective of enabling development while protecting highly productive land and water quality. Science input from the ORC will be essential in achieving this approach consistently across the region and to provide clarity to councils and the community about expectations and management.

14. The DCC acknowledges balancing development against the protection of highly productive soils and water quality will be a challenge. It is acknowledged that ORC recognises these issues and will provide further scientific input.
15. The DCC acknowledges a key challenge in urban development is the management of wastewater and stormwater networks. Provision of a robust planning framework for network discharges to ensure clarity and consistency would be beneficial to Councils and communities.

### **Transport for the city**

16. The DCC acknowledges the collaborative work being undertaken by the ORC and DCC in the Dunedin transport space, including the joint investigation of a bus loop for the city, ways in which fares could be subsidised across the network, and scoping discussions for the Regional Public Transport Plan review. The DCC wishes to continue working with the ORC on transport matters in a collaborative way as there is considerable opportunity to achieve the best outcomes for Dunedin by working together. As highlighted above, improving public transport in Dunedin is central to delivering on the DCC's target of achieving net carbon neutrality for the city by 2030.
17. The DCC maintains the position of seeking a simplified public transport fare structure in Dunedin.
18. The DCC would like noted the passing of the following resolution of the Council in August 2019:  
  
*That the Council:*
  - a) *Supports in principle, the transfer of public transport governance in the Dunedin district from the ORC to the DCC;*
  - b) *Requests that the ORC include this question in their forthcoming review of the Regional Public Transport Plan, and;*
  - c) *Continue to work with LGNZ and central government on reform of the Public Transport Operating Model (PTOM).*
19. The DCC also notes the letter sent from Mayor Hawkins and Mayor Boulton to Chair Hobbs in December 2019, reinforcing a commitment to a positive working relationship between organisations as it relates to the public transport investment space.
20. The DCC would like to see clarity on how the DCC can be actively involved in the Regional Public Transport Plan review, including how matters of governance can be raised. The DCC regrets that the Regional Public Transport Plan is not further advanced and would like to see it progressed as a matter of priority.

21. Given the ORC has a responsibility for planning the transport system, by connecting communities and in line with the Government priorities for mode shift, the DCC will work with the ORC to advance safe, shared paths to our communities, supporting them into the Regional Public Transport Plan 2021-31 for NLTP funding.
22. The DCC welcomes the further clarity on funding for transport matters by the ORC, including on the following:
  - Funding is allocated for changes to operational contracts to ensure the Regional Public Transport Plan review is properly resourced. However, clarity is sought regarding resource for the next step of public transport investment required in Dunedin.
  - Current transport planning for the new hospital development envisages a step change in public transport provision. Clarity is sought around how this is being factored into future financial planning.
  - There is no mention of provision for the development of Regional Speed Management Plans, which may be required.
23. The DCC requests that the ORC seeks pricing information from the market for electric vehicle options when finalising contracts for the Public Transport Operating Model (PTOM) units. This would assist the DCC in planning towards Dunedin's target of net carbon zero by 2030.
24. The DCC requests that the ORC considers the approach of Greater Wellington Regional Council who have taken lead on provision and support for EVs in their region, including coordinating a Regional EV Working Group.

### **Managing freshwater**

25. The DCC looks forward to continuing to work with the ORC on plan changes to improve the management of freshwater. The DCC welcomes any opportunity for partnering with the ORC where compatible workstreams align, such as for urban water quality, and community consultation in relation to environmental outcomes.
26. In addition to what is currently planned, the DCC would like to see a Taieri Flood Protection Scheme performance review undertaken, to determine not only how well it will cope with the extra pressures of climate change, but with urban development as well. While the ORC considers the Taieri scheme to be a rural drainage scheme, a large part of the scheme services an urban area. The DCC would welcome a partnership approach to ensure the scheme is performing and functioning appropriately to protect the entire community it services.

### **Increased monitoring**

27. The DCC supports the additional funding being made available for more freshwater monitoring to better understand the state of environment (SOE), and to inform the public about the suitability of water quality for contact recreation.
28. The DCC would be particularly supportive of ORC collecting more data about water quality in urban environments, which would also be consistent with the vision, goals and methods of ORC's Urban Water Quality Strategy 2017.
29. The DCC would like to see the increased monitoring extended into the coastal marine area, an area used extensively for contact recreation. Monitoring water quality against contact recreational standards allows communities to be confident about the suitability of waterbodies for swimming, surfing and boating. The DCC notes not all popular sites are monitored, and it would be beneficial to consider a consistent set of criteria for establishing monitoring sites. It would also be beneficial for the ORC to increase public awareness about its SOE monitoring, the suitability of the local environment for recreational activities, and individual actions people can take to improve water quality.
30. As a holder of resource consents to discharge contaminants to water, the DCC is required by the ORC to undertake extensive environmental monitoring. The DCC faces challenges when gathering environmental data through consenting and recommends consideration of a more strategic approach. Current challenges include a lack of Dunedin-wide vision for what data is collected and how it is used to drive improvements, a lack of flexibility in adjusting the monitoring regime, and a lack of inhouse expertise to respond to the results obtained.
31. The DCC would like the ORC to consider taking greater ownership of all environmental monitoring, aligning it with SOE and contact recreational monitoring, and charging costs of monitoring to consent holders. The consent holder should continue to undertake any monitoring of the discharge itself. This supports the position as noted in the ORC's Urban Water Quality Strategy 2017 "Integrating our approach to regulation, monitoring, and information-sharing is important if we want to achieve a successful long-term strategy and most importantly, good or excellent water quality throughout Otago".

### **Freshwater Management Units and catchment management plans**

32. The DCC supports the allocation of additional funding for reporting and modelling Freshwater Management Units (FMUs). However, it is important to ensure adequate funding is available for FMUs and Catchment Management Plans so they can be prepared and implemented appropriately.
33. Dunedin is currently covered by two FMUs – the 'Dunedin Coast' and 'Taieri'. The DCC suggests that ORC's aim of improving urban water quality would be better supported if these FMU enabled a more urban-focus. For example, Dunedin may benefit from separate FMUs for the Kaikorai, the Leith and Tomahawk Lagoon catchments. The 'characterisation' monitoring

of these FMUs could be done in conjunction with the increased SOE monitoring that has been proposed.

34. The DCC would like to see the implementation of catchment management plans, utilising the information gathered from SOE and FMU monitoring to achieve good water quality outcomes. The DCC believes catchment management plans would provide territorial authorities, businesses and communities with clear guidelines and goals. The DCC would be interested in partnering with the ORC to develop FMUs for the Kaikorai, Leith and Tomahawk Lagoon (and potentially others). This would enable a good understanding of those catchments and the issues they face, facilitate a consistent approach to their management and provide guidance for all parties interested in being a part of improving urban water quality.
35. The Tomahawk Lagoon is a Regionally Significant Wetland with poor water quality. The DCC is particularly supportive of the ORC taking a lead role in driving improvements of the wetland, including funding for educational and improvement initiatives. In 2018, two community workshops were held, but unfortunately the intended progress on a third workshop and additional funding has not occurred. The DCC would like to see this Lagoon project prioritised.

#### **Drinking water source protection**

36. The DCC supports the ORC providing for the protection of drinking water sources through implementation of the National Environmental Standards for Sources of Human Drinking Water. The DCC notes the Government has proposed, through the Essential Freshwater Programme, revising the standards to strengthen the ability of regional councils and territorial authorities to manage risks to drinking water posed by activities in drinking water catchments.
37. The ORC is one of nine Councils that forms part of the Southern Drinking Water Reference Group, set up in 2018 as a response to the Havelock North inquiry recommendations. The DCC supports the continued collaborative operation of this group, and the ORC's presence within it. The DCC requests the allocation of ongoing resource to enable this role to continue.

#### **Urban watercourses**

38. The Dunedin urban drainage network includes public stormwater pipes, and private watercourses (both open and piped). The DCC is investigating numerous capacity and flooding issues within this network, and has identified the ORC, under its Resource Management Act 1991 functions, has a key role to play in addressing those challenges. The DCC requests the ORC make resources available to partner with the DCC in developing solutions. Challenges include:
  - Addressing privately owned structures (such as pipes) already present in or on the beds of rivers, that are undersized and/or poorly maintained, and are contributing to flooding and causing property damage.

- Addressing adverse cumulative and significant downstream effects of discharges of stormwater from individual properties into watercourses, that are currently permitted by the Regional Plan: Water.
- Assessing various management options for urban watercourses that are an integral part of the city's drainage network e.g. from fully piping to daylighting.

### **Coastal matters**

39. The DCC notes there is no mention of funding associated with coastal works or coastal erosion monitoring in the Annual Plan (although there is funding allocated in the LTP). If adequate funding is not currently allocated for this work, it is requested that the ORC give consideration to further resourcing for:
  - The DCC and ORC Memorandum of Understanding that outlines the projects that both Councils will be working together on to gather coastal hazard information. This is an important document, as are the projects proposed by it, particularly the initial district-wide coastal hazard screening that will inform more detailed assessment on higher risk areas and assets and other coastal assessments.
  - Coastal monitoring, particularly nearshore monitoring along the coastal frontage at Ocean Beach is essential to facilitate both Councils developing an understanding of the potential futures for beach management and feeding into the broader South Dunedin resilience picture. The coastal hazard screening will inform the framing up of monitoring plans for specific sites. Resourcing for monitoring of Ocean Beach should be specifically identified and allocated by the ORC.

### **Looking after our natural environment and resources**

40. 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.
41. The Strategy's implementation is overseen, monitored and reviewed by the Te Ao Tūroa Partnership, of which the ORC is a member. The DCC encourages continued active ORC involvement in the Partnership and the delivery of the Strategy's goals.
42. The Strategy implementation 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 the Strategy.
43. The DCC would also be willing to work with the ORC to take a collaborative approach to public education and awareness-raising to promote active learning about the biodiversity in the city

and would welcome an active leadership role from ORC in driving collaboration across the region.

#### **Other activities**

44. The DCC supports increased funding of the ORC's regulatory functions across both policy and consenting functions. The DCC supports increases in funding to facilitate collaborative engagement in developing the Regional Policy Statement (RPS) and regional plans, consenting matters, and in freshwater management, including the development of FMU and other management plans.
45. However, the DCC also encourages the ORC to provide increased resourcing for science teams to support the policy and consent work of the ORC and to work on collaborative projects with the DCC, as highlighted in other parts of this submission.
46. The DCC also wishes to acknowledge the ongoing importance and value of working in partnership with ORC on matters concerning the Otago harbour edge.

#### **Concluding remarks**

47. While the Triennial Agreement is not a matter for discussion as part of the Annual Plan, the DCC would like to engage with the ORC as early as possible regarding priorities for inclusion in the next iteration of the Triennial Agreement. While these recommendations would not bind future councils, they may provide a useful resource to inform the next agreement.
48. Thank you again for the opportunity to submit on the ORC Draft Annual Plan 2020/21. Should the ORC wish to clarify any of the issues raised in this submission, please do not hesitate to get in touch.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Aaron Hawkins', written in a cursive style.

Aaron Hawkins  
**Mayor of Dunedin**