

March 2021

**Submission on Central Hawke's Bay
Long Term Plan 2021-2031**

Emailed to: facingthefacts@chbdc.govt.nz

From:

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Introduction

1. Forest & Bird wish to be heard in support of this submission.
2. This submission is made to Central Hawke's Bay (CHB) District Council on behalf of the national office and the local branch of the Royal Forest and Bird Protection Society New Zealand Incorporated. Forest & Bird is New Zealand's leading independent conservation organisation, which has since 1923 played an important role in preserving New Zealand's environment and native species.
3. Before people arrived in Aotearoa New Zealand, 80% of the land was covered in dense forest¹. Now only 24% remains. It's the same for wetlands, with over 90% degraded or lost; vertebrate species, with 79% threatened with or at risk of extinction²; freshwater fish, with 76% threatened with or at risk of extinction; and our rivers, with 95–99% of river length in urban, pastoral, and exotic forest areas exceeding water quality guidelines³. We are losing the things we value so much, the ecosystem that protect and sustain us, and that we are inherently connected to.
4. When nature thrives, our communities thrive. Healthy native forests, wetlands, and rivers sequester carbon, provide habitat for native species, filter freshwater, and protect us from floods and droughts. We're also inherently connected to nature, and numerous studies⁴ show that when we connect with nature, we're happier and healthier.
5. Nature has been pushed to breaking point by human activity, climate change, introduced pests, pollution, and deforestation.

¹ <https://www.doc.govt.nz/nature/habitats/forests/>

² <https://www.stats.govt.nz/indicators/conservation-status-of-indigenous-land-species>

³ <https://www.mfe.govt.nz/sites/default/files/media/Environmental%20reporting/our-freshwater-2020-summary.pdf>

⁴ <https://www.stuff.co.nz/environment/300132370/environmental-historian-says-new-zealand-cities-need-more-nature-in-new-book>

6. But it doesn't have to be like this. It's not long ago that nature thrived in Aotearoa New Zealand. We need to bring back nature. And we don't have to look back far to know what that could be like.
7. CHBDC has made many commitments to the community on protecting and restoring nature, on minimising our contribution to and effects of climate change, and enhancing community wellbeing. It has a strong mandate to follow through with those commitments in this long term planning round.
8. Central Hawkes Bay certainly has a number of challenges facing it many more than the four identified in the Facing the Facts campaign.

Challenge #1: Wastewater Infrastructure

9. It is no longer, if it ever was, acceptable to dispose of human waste in waterways. This seemingly small shift in expectations requires a large change in practice. That the previous iteration of the wastewater treatment plants were never going to meet consent requirements demands that a new approach be taken.
10. Discharging waste water, no matter how treated, into waterways is not acceptable.
11. We prefer Option 2.
12. The relatively small increase in per user cost ensures wastewater is removed from our waterways sooner.
13. Other ways to fund the small differential could be found e.g. non-connected users could contribute for a fixed period of time.
14. Further, whilst we applaud the suggested requirement for rain water collection tanks on new urban houses, we believe Council should be bold and go further. Enabling and promoting the use of alternative systems for wastewater could help to reduce the demands on infrastructure.
15. This would include composting toilets or on-property treatment facilities. Greywater systems and composting toilets could be an important part of the solution and should be simple to install and use in Central Hawkes Bay.
16. CHBDC should be taking up Central Government's offer to invest in regional three waters infrastructure by signing up to potential three waters management reform.
17. CHBDC should be lobbying Central Government for assistance to meet standards.
18. This problem is not limited to CHB: numerous wastewater treatment plants (WWTP) across Aotearoa discharge directly to freshwater environments and non-compliance with environmental standards is widespread. Freshwater quality across the country is severely impacted as a result. Forest & Bird consider this an archaic and disappointing situation to be in. Discharges to WWTPs that do not comply with standards set in local bylaws only exacerbate this issue, increasing the pressure on plant operators and making it harder for them to meet environmental standards.

19. Unfortunately, there is a legal loophole surrounding trade waste bylaws, as referenced in a recent Radio New Zealand (RNZ) exposé⁵ on companies' compliance with bylaws across the country, and the impact this has on wastewater treatment plant (WWTP) operators' ability to meet environmental limits set by regional councils.
20. Forest & Bird understands this loophole in the law prevents local governments issuing fines to non-compliant dischargers of wastewater to their networks and treatment plants. Councils are therefore limited to simply recovering any costs the breach might have resulted in (such as additional cleaning required to make the plant fully operative if its function was impacted by the breach) or taking the issue to the courts, at significant cost.
21. In response to this issue, Local Government New Zealand (LGNZ) has suggested to numerous Ministers since 2002 that a law change is necessary to allow local councils to fine non-compliant companies. Addressing the issue requires a relatively simple amendment to section 259 of the Local Government Act 2002 to allow regulations to be made prescribing breaches of council bylaws that are infringements under the Act. We understand LGNZ has made this same request of the current Minister, yet the law still has not been changed.
22. We implore CHBDC to continue lobbying LGNZ, local MPs, and the Minister for Local Government to undertake a law change to allow council to fine those companies and organisations that are not complying with trade waste bylaw requirements. This would hopefully result in better compliance with trade waste bylaws, less stress on the WWTP, and fewer costly failures (or fewer non-compliance events). It would also allow CHBDC to recover costs of problems more readily.

Challenge #2: Asset Replacement

23. As above, CHBDC should be seeking investment from Central Government in three-water infrastructure by signing up to their reform program.
24. Debt also makes sense given interest rates are extremely low.

Challenge #3: Waste Free CHB

25. CHBDC needs to go back to the drawing board on this to get the settings right before spending more money changing it to something that may have a range of unintended consequences.
26. CHBDC should be pushing Central Government to carry on with its reform to phase out single use plastics and increase product stewardship so that producers of packaging are responsible for the disposal. This would assist with reducing waste to landfill from CHB and reduce contamination of recycling with un-recyclable materials.

⁵ Bradley, A. (2021, February 9). Revealed: The companies dumping contaminants down the drain. RNZ. <https://www.rnz.co.nz/news/in-depth/435111/revealed-the-companies-dumping-contaminants-down-the-drain>

27. A vision as important and large as Waste Free CHB is going to need careful tending to ensure success. Diverting waste from land fill and increasing recycling are laudable goals. Barriers to recycling should be removed and incentives to 'dump' recyclable materials avoided.
28. We prefer Option 2- No change to rubbish and recycling collection services
29. The removal of the Drop-off Centres at Tikokino, Ongaonga, Takapau and Otane has the risk of introducing a significant barrier to recycling. The many additional trips needed to take recycling to Waipawa or Waipukurau will also increase GHG emissions. The lack of detail or certainty about possible 'mobile' collection points means their effectiveness is difficult to predict.
30. The introduction of 'wheelie bins' for refuse rubbish collection will almost certainly increase the amount of recyclable material, and material in general, going to landfill.
31. We prefer the status quo- rubbish bags- for refuse collection.
32. If one of the issues with the collection centres is contamination of the recycling then surely wheelie bins, where the contents are out of sight, would encourage the same behaviour.
33. CHBDC should also be looking for compostable waste solutions, and/or promoting 'community compost' stations around the district, and/or promoting home-composting.

Challenge #4: How do we pay for the growth?

34. Costs of development should not just be on the developer, as that can create inequities (e.g. push up house prices because new houses cost more).

Other challenges:

Climate Change

35. Climate change is already having an impact in Central Hawke's Bay with hotter, drier weather being most noticeable. Combined with over allocation of ground water, the result for some of our remaining remnants of native forest has been catastrophic.
36. Engineering our way to resilience against the impacts of climate change isn't going to work. For example, riverbank 'reinforcement' might give us some time before a river bank erodes to a road, but in the end the river will get the better of the engineering.
37. We know that trying to reinforce a riverbank just creates a space for erosion elsewhere – usually on the other side of the river or downstream. We also know that rivers eventually erode around the sides and base of these sorts of reinforcement – so it's definitely not a long term solution. With higher and more frequent flood flows predicted with climate change, the pressure on riverbank reinforcements will only

increase, and when the reinforcement eventually fails the consequences will be greater. We saw this in 2019 with the Rangitata River jumping across the road back into its southern branch, with the Waiho River tearing down a bridge and cutting off communities, and the Fox River opening up a landfill and spreading rubbish across beaches up to 100km away.

38. We have tried to straighten and contain rivers in an effort to stabilise them, but that's increased the risks we face from flooding, and destroyed the beautiful places that we're connected to, that provide habitat for birds and fish, and that recharge our aquifers.
39. Council needs to change the way it thinks about climate resilience.
40. The reality is rivers are most stable when they are given room to move – when they can safely flood and dissipate their energy, and can adjust their course within their channel. We shouldn't be surprised when a river floods or erodes a bank – that's just a river being a river.
41. We've created an issue by encroaching so tightly on rivers, but what we really need to do is provide room for the rivers.
42. We also see this issue on the coastline.
43. These environments have mauri, and engineering them into shape doesn't maintain that mauri.
44. Aotearoa's approach to this is archaic – we're still trying to contain rivers or put them in fixed channels; or build concrete walls to keep the sea away. But internationally providing 'room for the river', and 'managed retreat' from coastlines is becoming standard practice. Creating room for a river, or retreating from a coastline, doesn't just increase the flood capacity of a river and reduce the frequency of flooding either – it also increases the area of habitat for fish and birds, creates more room for riparian wetlands, reduces the costs of flood maintenance work and engineering, and opens up spaces for recreation. It's a win all-round.
45. Several of Aotearoa's river experts have recently called on decision makers to work with rivers, rather than against them, giving them space to move and allowing channels to adjust. (<https://theconversation.com/why-we-should-release-new-zealands-strangled-rivers-to-lesser-the-impact-of-future-floods-153077>)
46. CHBDC needs to think about these sorts of 'natural' solutions to mitigating the risks of climate change.
47. In the long term they will provide the best economic, environmental, and wellbeing outcomes.

District Plan Review

48. Before people arrived in Aotearoa New Zealand, 80% of the land was covered in

dense forest. Now only 24% remains. It's the same for wetlands, with over 90% degraded or lost; vertebrate species, with 79% threatened with or at risk of extinction; and freshwater fish, with 76% threatened with or at risk of extinction. We are losing the things we value so much, the ecosystem that protect and sustain us, and that we are inherently connected to.

49. The district plan review needs to progress and include protections for Significant Natural Areas, on private and public land, to ensure no more native vegetation is lost. And to ensure native species have somewhere to live. These places are good for our wellbeing, sequester carbon, provide habitat for native species, increase the water-holding capacity of the soil, and make our communities more resilient.

Reserves and Nature on Private Land

50. CHBDC has 185ha of reserves.
51. There is also likely to be a large area of native vegetation on private land.
52. CHBDC should be actively investing in the protection and restoration of these areas. This should be through a district plan review to protect these areas where they meet the criteria to be 'Significant Natural Areas' but should also include investment in restoration work to improve the condition of these reserves and protect them from pests.
53. Forest & Bird would support CHBDC making a case to Central Government for 'Jobs for Nature' funding to undertake some of this work. In particular, restoration work of wetlands in CHB would be of extremely high value – for biodiversity, habitat, flood protection, water retention and groundwater recharge, and as a carbon sink (wetlands, and peat wetlands in particular, make excellent carbon sinks).
54. CHBDC should be working with Central Government and HBRC to do all it can to restore areas of natural habitat in its district. It should also be looking to expand these areas.
55. Forest & Bird has a particular interest in Ōtaia. According to one councillor a Forest & Bird member has spoken with, the priority for parks and reserves is health and safety. Has any assessment been done for Ōtaia and if so what were the outcomes? Was any remedial work included in the budget for the reserve?
56. Central Hawke's Bay Forest and Bird contribute significant volunteer hours to maintain this reserve. We are aware that currently these volunteers are ageing. We would like to flag that in 5-10 years we may need an increased grant or assistance to find additional grant money to fund any shortfall.

57. We strongly request CHBDC to help and advocate for improving the entrance and car parking area at this reserve. At present it is extremely unappealing and certainly does not meet the goal of a 'Proud District'. Various attempts have been made to progress this, but it seems to be going backwards.
58. Supporting this kind of community work is vital for community wellbeing, and promoting community use of and connection with these reserves. As mentioned earlier, connecting with nature has been shown in numerous studies to be good for mental health and wellbeing, as well as promoting physical health outcomes.
59. The volunteer hours that go into this sort of work are also extremely valuable for CHBDC.