



Submission on the Christchurch City Council LTCCP

From
Sustainable Otautahi Christchurch Inc.
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We do wish to be heard.

And we do request an email copy of the officer comments on our submission at least 2 days prior to our attendance at the Council hearing.

Introduction

1. SOC thanks the Council for the opportunity to make this submission. We have expressed to you a desire to collaborate with Council and to find constructive ways of working with you. Participating in this formal special consultative process is one of those ways.
2. Sustainable Otautahi Christchurch Inc. is an incorporated society formed in April 2005. SOC developed this submission through collaboration with members. This was refined by further distribution and comment on the draft from SOC members to produce this final submission.
3. The aims of the organisation as in the Constitution are:
Recognising Te Tiriti O Waitangi/The Treaty of Waitangi, to actively contribute within Otautahi/Christchurch to opportunities and means for achievement of long-term sustainability. In doing so, to seek to ensure that all people have their basic needs satisfied, so that they can live in dignity, in healthy communities, while having the minimum adverse impact on natural systems, now and in the future.
4. The objectives of the organisation as in the constitution are:
 - *To facilitate and promote education about the ethics and practice of sustainability in the community*
 - *To encourage education about sustainability by the promotion of innovative planning and design of urban developments and projects.*
 - *To promote, conduct and publish research as part of a programme to educate about a whole systems approach to sustainability.*
 - *To carry out any other charitable activities which are considered practicable and desirable in reaching the vision, aims, purposes/objectives outlined above.*
5. SOC is committed to ensuring social, cultural, environmental and economic aspects of future development in Christchurch area are all addressed.
6. A fundamental premise for our submission is that Christchurch's development is on an unsustainable pathway, and urgent action is required to turn this around. It will not be possible to sustain the present system's resource exploitation, ecological destruction and social problems for much longer. Capturing the vision of citizens for a more sustainable future will enable a change of direction from the present unsustainable path.

The Local Government Act 2002

7. The purpose of local government (S10) is:
 - a. To enable democratic local decision-making and action by, and on behalf of, communities; and
 - b. To promote the social, economic, environmental, and cultural well-being of communities, in the present and for the future.
8. It is to provide for democratic and effective local government that recognises the diversity of New Zealand communities

9. When taking action the Council:
 - a. must fulfill the purpose of local government
 - b. must have systematic and transparent decision making
 - c. must keep the public well informed, and consider the public's views at each stage of decision making
 - d. must use formal processes for major decisions
 - e. will be subject to requirement of other legislation
10. Schedule 10 of the LGA 2002 lists what must be included in the LTCCP.
11. Throughout our submission we will refer to these and other requirements under the LGA 2002

General

12. We find the LTCCP somewhat cumbersome and difficult to follow. We found it difficult to find some of the relevant sections that are statutorily required to be included in the LTCCP. Information on any one activity is spread through the document. For these reasons we have made comments in our submission about apparently-missing information that may actually be included somewhere in the document, but we could not locate it.
13. There are short statements made in the CCC's LTCCP that could have a major impact on the future direction of the city. For example, page 22, "...other reviews may take place to consider how best to deliver housing water and waste." We can find no further reference to these 'reviews' but feel some disquiet about the fact that they are not identified.
14. It is important that CCC is seen as a role model for sustainable practice. With the apparent demise of the Sustainability Directorate at the CCC we have perceived a reduction in the commitment to advocacy and education on sustainability, and a loss of support to Council units in taking a holistic and long-term view. Operational issues are dominating thinking and activities, and strategic thinking and holistic approach appears to be sporadic.
- 15. We ask that Council include a section in the final document that outlines what the Council is doing to become a more sustainable organisation.**

Sustainable Development approach

16. Essentially the roles of the Council are to generate and foster democracy and to provide for the promotion of wellbeing of all, taking a sustainable development approach.
17. "In taking a sustainable development approach a local authority should take into account –
 - a. the social, economic and cultural well-being of people and communities; and
 - b. the need to maintain and enhance the quality of the environment; and

- c. the reasonable foreseeable needs of future generations.” (LGA 2002 S14 (h)).
18. In reading the LTCCP we have the overall impression that perpetual economic growth is a central assumption, seen as a normal state of affairs. We would express caution about this assumption as it is not in any sense sustainable development; rather (short-term) growth management.
 19. There are no obvious policies in the LTCCP to address what we see as some overarching uncertainties reflecting major changes in the real world, of which some of the most important are:
 - a. Peak Oil, meaning that humanity has reached the stage at which petroleum-based liquid fuels (for transport especially) can be expected to continue to increase in real price, with no substitutes in view at anything like present-day prices. There will be significant parallel increases in the price of most artificial fertilisers for agriculture, many of which are petroleum-derived.
 - b. climate change predictions of increased extreme events, reduced rainfall and drier conditions for agriculture and horticulture in Canterbury, and the concomitant demand by agriculture and related industries for more and more water are already creating significant social and environmental conflict
 - c. continuing increases in the price of electricity, as the availability of Maui gas declines rapidly and the availability of new hydro sources can no longer be relied upon.

Changes of this type can be expected to give rise to changes in the structure of economic (and social) life in all parts of NZ, greater than any experienced in the last 50 years. They should be explicitly planned for, rather than left until later, in the hope that “something will turn up”. Central government currently appears to be following the latter policy and so we strongly urge that TLAs and Regional Authorities take up the responsibility for proactive policies.

20. We have not been able to discern whether comprehensive Sustainable Development principles have been built into the LTCCP process. As stated above, the LTCCP appears to us to have perpetual economic growth as a central premise and makes no obvious attempt to acknowledge that in the long term - several future generations into the future, not just 10 years - the sort of growth currently envisaged (population, economy, production and consumption) will make more and more resource and waste disposal demands upon the fragile ecosystem that sustains us, all at a time when the cost and undesirable consequences of both material and energy resource use and of waste disposal are growing more rapidly than the economy itself.
21. The overall process of economic growth, as currently-followed in NZ (as in most of the developed world) is inherently unsustainable, and will inevitably lead to social and environmental stresses and failures. In our opinion, planning for the next 10 years cannot be separated from the need to plan for options available to future generations - meaning no less than 50 years ahead and preferably at least a century. Leaving options for the future rather than pre-empting them to satisfy today’s short-term priorities would be a key

indicator of strategic intent, but we see little of this in the document. We are disappointed that there is no clear underlying statement of an ethical principle of sustainability in the LTCCP.

22. Much of the allocated budget is assigned to asset management, but no obvious consideration has been given to whether these assets are in fact the ones that are most appropriate for a sustainable city in the future. Asset management tends to continue with what is there, rather than new ways of dealing with new realities. The existing Dominant mindset assumes that existing systems are adequate and allows for continued maintenance and asset management of these. Any changes are seen to be incremental. The Emerging mindset (below) requires redesign of urban form and urban settlements. In the transition to this redesign, the use of some 'new' technologies will be appropriate eg solar water heating, double glazing, rain water tanks. But technology alone will not make the transformation required.
23. We need a different way of thinking, which we characterise (attachment 1) as that of the change from a current consumption-oriented Dominant mindset to a sustainability-promoting Emerging mindset. Without such a change, we believe the idea of sustainable development will have little substance, and remain both a dream and a slogan.

Vision

24. We note the Council's Vision (p9) that "Our future Christchurch is a world-class boutique city, with a first-world lifestyle, first-class environment, diversity of landscapes and unique economic base" It is not clear how or by whom the Vision was developed, but we see it as more a slogan than achievable reality.
25. A lifestyle of the type currently enjoyed by the so-called First World is not SOC's vision, nor, we believe, the vision of most City residents, as enunciated in the Community Outcomes exercise. Reduction in poverty, alienation and social exclusion, together with reduction in resource use and impact on the environment are more important to most people than a growing material standard of living. The Vision suggests we are more concerned about how the city looks than about how it functions, and that enjoyment comes before health. It makes no recognition of the importance of the ecosystems on which we all depend. Nor does it provide a central ethic or benchmark against which to assess decisions and budget allocations. It is SOC's earnest request that the CCC adopts the basis of Strong Sustainability for its central ethic, as described in SOC's presentation to the CCC seminar in March 2006.
26. **We ask that the Vision be rewritten with the community to recognise the purpose of local government to provide for democratic and effective local government that recognises the diversity of NZ communities, playing a broad role in promoting well-being of their communities and emphasising *Strong Sustainability*, as described by SOC in our presentation to the CCC seminar in March 2006.**

Community Outcomes

27. The Community Outcomes were based on good research in 2004 – focused on human society. We were pleased to have some input into the revision of the Community Outcomes, although they were almost finalised when SOC was formed just a year ago.
28. The headline indicators are a substantial improvement on those listed in the LTCCP 2004-14 in that most of them are measurable and the source data well-documented.
29. There have been changes made to the Community Outcomes in the LTCCP 2004-14. Some of these are a change in layout, but the intent of some Community Outcomes has been changed significantly. Significant deletions (in bold face below) are:
- a. A Prosperous City – a job-rich economy **while protecting and enhancing our essential natural capital**
 - b. A Well-Governed city – our city’s infrastructure and environment are managed effectively, **are responsive to changing needs and focus on long-term sustainability**
 - c. A City of Inclusive and Diverse Communities - **We recognise our bicultural heritage in our multicultural society**
 - d. A Healthy City – **or economy is based on practices that promote and improve health; reduce health inequalities; improve mental well-being**
 - e. An Attractive and Well-Designed City – **develop liveable neighbourhoods**
 - f. While an aging population is recognised as a trend, no community outcomes refer to it.

It is not obvious whether these deletions were deliberate or accidental, but given their relevance, we express surprise and disappointment at their omission.

30. We have recognised some conspicuous gaps in the Community Outcomes, which we understand are to be used as firm guidelines for future policy. While a number of important areas relating to sustainability of the system of Christchurch-in-Canterbury are well-addressed, there are gaps relating particularly to:
- a. the security and adaptability of the economic system,
 - b. the general viability of the total environment and ecological systems, and
 - c. overall recognition of the contribution of the parts to sustainability of the whole system.

In our opinion, these areas need urgent attention, not least because unless this is done quickly, monitoring procedures will not be put in place in time to be able to track changes in the sustainability of critically-important parts of our total system. The risk is that while indicators of parts of the system may look favourable, the whole appears to be going further into unsustainability.

Monitoring Community Outcomes

31. One of the roles of the Council is to monitor the Community Outcomes. The LTCCP must include what measures will be used to assess progress towards the achievement of community outcomes and must state how the Council will monitor and report on the community’s progress towards achieving community outcomes (LGA 2002, Schedule10).

We would like the Council to be explicit about the framework they intend to use for this monitoring in collaboration with others including ECan, mana whenua, government organisations and NGOs.

Strategic Directions page 49-58

32. SOC is somewhat confused about addition of the term “strategic objectives” which outline how CCC will contribute to these Community Outcomes. These introduce four new terms that overlap with the 9 Community Outcomes, but we can see no further reference made to them in the rest of the document. We believe it is the Community Outcomes that should be referred to under each of the Council’s activities.
- 33. We suggest that the term Strategic Objectives be deleted, and instead for each of the Community Outcomes it is made clear how the Council will contribute. The work on key challenges should not be lost however.**
34. The ‘Goals and Objectives’, ‘Key Challenges’ and ‘Who We need to work with’ are listed for each of the four Council Strategic Directions. It is here that some of the challenges we have identified above have been identified. Unfortunately the information and intentions in these pages do not appear to have been carried through the rest of the document, and we cannot see a clear relationship to the capital programme prioritisation decisions.
35. While it is acknowledged in this section who the Council needs to work with, the requirement under Schedule 10 of the LGA is for the Council to outline *how* they will work with other local and regional organisations, Maori, central government, NGOs and the private sector. A clear account of this relationship with the voluntary sector (including NGPs) would add greatly to the strength of the document.

Relationship with Maori

36. The LTCCP states that “the Council has a strong working relationship with Maori” (page 289). This relationship is not detailed anywhere and is not evident in other parts of the LTTCPP or in our experience.
37. In the last two years, attempts have been made by Council to engage with Te Runanga o Ngai Tahu but we understand with little success. Relationships with mana whenua/Papatipu runanga are effectively non-existent, and iwi, hapu and whanau have had no apparent consideration in Council consultation or decision making. This issue has increased significantly in importance since the accession of Banks Peninsula to the City.
38. The LGA 2002 requires local government to “provide opportunities for Maori to contribute to its decision making processes” (LGA 2002, S 14(1) (d)). The Council must establish and maintain processes to provide opportunities for Maori to contribute to decision making processes and consider ways in which it may foster the development of Maori capacity to contribute to the decision-making processes. (LGA 2002, S81).

39. The LTCCP needs to set out much more extensively, the steps the Council intends to take, having considered ways in which it might foster the development of Maori capacity to contribute to its decision-making processes (LGA 2002 Schedule 10).
40. Page 289, or elsewhere in the LTCCP, does not provide adequate information as to how the Council intends to meet the requirements under the above sections of the LGA 2002.
41. There is no reference to the Treaty of Waitangi in the LTTCP. We believe there is a need for CCC to address the issues within a Treaty framework, since the statutory responsibilities in relation to Maori in the LG Act 2002 are Treaty responsibilities that the Crown resolved to devolve to local authorities. Implementation would require a more direct relationship between local government and mana whenua/Papatipu Runanga, with whanau, hapu and iwi being considered likely units for strengthening the customary self-governance of Maori in conjunction with local and regional councils. The Committee established two years ago with representation from Te Runanga o Ngai Tahu, Ngai Tuahuriri, Te Runaka ki Otautahi o Kai Tahu and Nga Maata a Waka should be re-established and expanded to include the other Papatipu Runaka now within the CCC boundaries, since the amalgamation with Banks Peninsula. This would enable the Council to address its statutory responsibility to build relationships with all Maori and stands alongside the statutory responsibility in the LGA to recognise the diversity of NZ communities.
- 42. We ask that the LTCCP list the steps the Council intends to take to meet their obligations under the LGA 2002 in their relationships with Maori.**

A decentralised city

43. The city form in the future must be based on localised, largely self-sufficient, communities. This will be necessary if the demand for non-renewable resources is to be reduced, and to mitigate the associated economic effects as living costs increase. It will also provide a degree of resilience to the community as a whole when confronted with natural disasters and other major events.
44. It is important to stress that peak oil, peak gas, and climate change are inevitable occurrences that will affect us all in very significant ways. We can attempt to mitigate their effects, or we can do nothing. SOC regards the LTCCP draft as a do-nothing response. In our opinion a major shift in the way we view and manage our city's evolution is essential, with the progressive achievement of community localisation being the primary objective. We see no alternative to this. This implies fundamental changes being made to the physical structure of the city, and to governance. If the City Council fails to instigate effectively an orderly transition towards sustainability in which localisation will play a large part, then it is likely that the community itself will assume its own response. Localisation will then occur, by default, and in an unplanned manner.
45. We note here that market forces are able to cope with change in the face of CERTAINTY, but it is the clear responsibility of sound local and national government to provide a comprehensive and well prepared path through UNCERTAINTY for the community that

government serves. A 'wait and see' approach to planning for now-inevitable climate change is not acceptable. While there are uncertainties the trends are clear. We look to the Council to prepare responsible and sensitive action plans, and modify its objectives and programmes of works accordingly.

46. We made a substantial submission to the GCUDS options, and urge you to read this submission. It gave the detail of how a decentralised city system could be developed. It is important that SOC is represented on the UDS Forum, where we can present a valuable viewpoint that is otherwise not present.
47. Our GCUDS submission also stressed the need for an urban fence so that the high quality peri-urban soils are preserved and made readily available and accessible for local food production and distribution. Because it is essential to plan for minimising the distances that goods must travel, food and energy production, in particular, must be in close proximity to areas of demand to minimise transportation costs. We see services also being decentralised to reduce the need for work-related travel. We support the creation of environmentally sustainable carbon-neutral communities
48. Accordingly, it is critically important that urban intensification occurs and is done well. The LTCCP allows for land purchase for greenfields development when the emphasis should instead be on renewal and intensification. In addition, there is little allowance for assisting and actioning good practice in urban renewal. None of the \$30m for urban regeneration or \$11.4m required for Neighbourhood Improvement Works for some of the older suburbs has been included in the LTCCP (pages 76 and 78). This runs counter to trends developing elsewhere in New Zealand, and overseas, where serious attempts are being made to focus on and provide high quality urban intensification and renewal.
49. We question the allocation of substantial funding for roading projects, based on assumptions of continued traffic growth, when it is already clear that traffic loads will soon begin to decrease. A substantial portion of this funding should be removed and be directed towards community localisation, given that one of its main benefits is traffic minimisation.
50. The proposed savings from closing libraries, swimming pools and community centres are in our view short-sighted and have little impact on the overall budget. With a move to a decentralised city centres around villages we will need more small local facilities rather than fewer. Local facilities, swimming pools and libraries should be retained and maintained.
51. To be consistent with the formation of localised communities, governance structures also need to be less centralised. The Community Boards should have a local role in representation and democratic processes. The LTCCP does not reflect the important role that these community boards should have. In fact, community boards are barely mentioned in the LTCCP and current experience is that their contributions to the workings of the City are being progressively reduced. Centralised authority by its nature disempowers local communities and thus loses contact with them. It is our view that this runs counter to

achieving social and functional sustainability through community localisation, given the inevitable impacts of peak oil, peak gas, and climate change. It is also totally contrary to the Local Government Act 2002.

52. We ask that the importance of Community Boards in our representative democracy be described in the final LTCCP

53. We also observe that Residents' Associations are receiving less support from Council. We submit that Residents' Associations are a representative voice for local communities and the support they have enjoyed in the past should be maintained and strengthened.

Capital Works programme page 71-80

54. The process followed for prioritising items in the Capital Works programme is unclear to us. We have endeavoured to obtain information on this process, and reasons why some items were given priority over others. The strategic thinking behind this decision making is not evident, and inadequate information appears to have been provided to those making the decision. Decisions do not appear to have been made around a Sustainable Development framework. (See Australian ESD frameworks, Attachments 2 and 3). Our submissions below suggest changes to some of the allocations based on information we have been able to gather.

55. A major flaw in the process appears to have been the inclusion or exclusion of groups of project packages under a single heading. For example the entire MCTS programme has been funded with no further prioritisation within the MCTS projects, or with no reference to the Council's ability and capacity to be able to complete all these projects in the timeframe. With a similar approach the entire implementation of the Biodiversity Strategy has been excluded from the budget, again with no prioritisation of the individual actions, and with no reflection on what the consequences will be on the loss of biodiversity in the next 10 years.

56. Because of this, and for other reasons, the budget is in our opinion heavily slanted towards providing infrastructure, with little emphasis on maintaining and enhancing the ecosystems on which we all depend.

Council Proposed Savings p86-87

57. We oppose the closing of community halls, community libraries, the mobile library and suburban pools. If these facilities have truly exceeded their useful life then their replacement on site should be considered. Provision of locally based facilities is important now but will become more so in the near future as the ability of many to travel any distance is restricted because of cost.

58. We support increasing parking charges and ask that free one hour parking is removed. This would provide a positive financial and benefit, and would remove an incentive for people to bring cars to the city.

Assessment of Various Services pages 201-227

59. We will not make comment on the detail of these assessments as we are aware this has already been through a consultative process.

60. But we ask that the second sentence in the first paragraph on page 201 is corrected to read as the LGA 2002 intended: “This is to ensure that future demand for services can be met, and the *environment and public health* are protected.”

Policy on partnership with the private sector p281-285

61. While understanding the requirement for developing a policy on public/private partnerships, we oppose the Council entering into PPPs in principle. Among other reasons, the cost of capital for the private sector will be higher than that enjoyed by the Council, and the incentive profit motive will almost always inflate the cost to the ratepayer.

Civic Offices

62. Information on the arrangement of providing a building for the Council organisation should be discussed with the community in a transparent process. We need to know and have the opportunity to comment on the long-term costs and benefits of the various options eg Lease or purchase existing building; Council built new, CCO built new.

63. We ask that the decision regarding the options for investment in the provision of Council offices be via a transparent consultative process.

Development contributions

64. We generally support the Council’s policy that the total growth component of the capital expenditure budgets will be funded by development contributions. We too want the development community and not the ratepayers to fund growth arising out of developments, as a fair reflection of the benefit distribution from that growth.

65. For developments involving intensification of existing residential or commercial land we ask that Council finds incentives and mechanisms to ensure these developments are of high quality and are sustainable.

Policy on determining significance and strategic assets p291-295

66. In our opinion, some of the clauses in the Policy on determining significance section of the LTCCP could be used to undermine the intent of the LG Act 2002 to safeguard public involvement in decisions concerning the public assets held by Council. The public wants to be consulted on whether public assets or management should be sold into private ownership. That decision is properly the decision of the public through the Council and not CCHL. The Council is responsible for the interests of the citizens of Christchurch who are the beneficial owners of the strategic assets.

67. We request the following changes to this section to reinforce our confidence in the Council’s regard for the public ownership of these assets:

- a. **Exclude the “sale of equity in Strategic Assets” from the “Practicality” clause of the Policy on Determining Significance (p292). Under this clause, as it stands, the sale of a significant asset could be made without invoking the Special Consultative Procedure, by claiming that urgent action is necessary to avoid missing a perceived short-lived opportunity. A prospective buyer could attempt to induce the Council to sell a public asset without due consultation and so we advise exclusion of equity sales from this clause.**
- b. **Restore “City Care Limited” and “Its equity in Red Bus Limited” to the list of Strategic Assets (p294). These assets are essential to the functioning of the city in the best interests of all the residents. They perform services driven by the community’s need, not businesses concerned with paying the greatest possible return to their owners. It is in the city’s interest that they remain in public ownership.**
- c. **In the list of Strategic Assets (p294) change four instances of the words “controlling interest” back to “equity in” as it was in the 2004 LTCCP (This is in relation to the shareholdings held directly by the Council or through Christchurch City Holdings.) This change could enable the disposal of equity in public assets, without invoking the Special Consultative Procedure, but retaining a controlling interest and hence not affecting the asset’s strategic status. No justification has been given for the change from the 2004 LTCCP and restoring the original wording is in the public’s interest.**
- d. **Remove the following clause from the notes following the list of Strategic Assets: “Strategic assets as defined above are the assets in total and not the separate elements of the assets. That is, the requirements of section 97 are only triggered if the proposal relates to the asset as a whole or a major sub-part of the asset.” As with the previous proposed change this clause could be used to sell equity in an asset, without consultation, by claiming that what was being sold is less than a “major sub-part” of that asset. The sale, without public consultation, of any part of a strategic asset would be an infringement of the intent of the LG Act 2002 and so this clause should be removed.**

Community Development, community funding, community facilities

68. It is timely that the Community Development Strategy be reviewed, including community funding and community facilities. These reviews need a clear purpose and framework. SOC is pleased to be represented on the reference group for the reviews.
69. While we support the review of the methods, criteria and accountability for community funding, and some rationalisation of the number of funding mechanisms at Council, we are pleased that funding has been retained for community group grants in 2006/07. The funding sits in various budgets:

a. Community Grants	\$4.245m
b. Community Boards allocations	\$2.34m
c. Economic Development	Approx. \$1m
d. Recreation and Sport	\$460,000
e. Arts and Heritage	Just over \$1m

The above items total more than \$9 million - SOC recommends that all these be included in the Community Grants review - not just the \$8.2 million that has been referred to in the publicity to date.

70. It is important that these amounts are increased in the future, and the funding review is not seen as an excuse to reduce the total funding.
71. Funding provided to the voluntary sector strengthens the organisations involved and in nearly every case provides huge leverage on the funding provided.
72. Council should also find other ways to strengthen the capacity of the community and voluntary sector, ensure officers have a good understanding of the sector, support volunteers, and insist on good practice by Council in working with the voluntary sector. This will help Council to meet its goals, will provide opportunities for Council and NGOs to achieve shared outcomes and will contribute to strengthening civil society.
73. We are aware that the Early Childhood Education strategy has been reviewed within the last two years. We see no need for there to be a further review. Early Childhood Education provision is one of the key determinants of health outcomes.
- 74. We ask that Council remove their intention to review Early Childhood Centres for the LTCCP.**
75. We are surprised to see the operational cost for the museum (page 107) almost double from \$6.2m in year 1 to \$12.2m in year 10, with no explanation in the LTCCP. **We ask that the rationale for this huge increase be explained.**

Energy

76. The LTCCP is implicitly based on the highly questionable “business as usual” assumption that energy supply is effectively unlimited and that the price of energy will not increase significantly with increased demand. Forecasts appear to have been based on current costs of energy at today’s prices. We are disappointed in the lack of any overall sense of urgency in developing policies to assist the region towards resilience in the face of what we see as highly-probable disruptions in petroleum fuels availability and price in particular, over the planning period and into the long term future.
77. All activities need to be evaluated in terms of the National Energy Efficiency and Conservation Strategy (NEECS) which establishes goals for the increase in efficiency of energy use and for the uptake of renewable energy sources. Major activities should be examined in terms of their release of carbon dioxide and other greenhouse gases.

78. As a first step we ask the Council to make it mandatory for all new houses to be built to a high and defined level of energy effectiveness, and to encourage the installation of solar water heaters and double glazing in all houses. The planning consent process should include strong encouragement for the orientation of houses to the sun.

Transport

79. Streets and transport account for almost 15% of the budget. \$187.3million is allocated to discretionary street and transport improvements (page 73).
80. With some effort we have been able to establish that this \$187.3m includes \$16m for Amenity improvement, \$26m Safety, including \$5M for school and pedestrian safety, \$8m neighbourhood improvement, \$34m for public transport excluding exchange (i.e. bus priority, suburban interchanges, park and ride etc.), and \$16m for cycling, a total of about \$100m. It is therefore confusing – and probably incorrect – that cycleways, safety improvements, and passenger transport infrastructure are listed in pages 76-80 as projects outside the criteria for inclusion
81. The remaining \$87m is for roading. SOC believes we should only be maintaining our very good existing road network and not planning for any future expansion. Building more roads does not relieve congestion; it merely shifts bottle necks from one part of the city to another. Cheap oil is running out. Residents will not be able to afford to drive as much. Investing in new roads (such as the Blenheim Road deviation, 4-laning and expanded motorways) should be undertaken with extreme reluctance.
82. Possible savings should be diverted to maintaining and improving existing community facilities such as localised library and swimming facilities. In the city of the future we will need to access services on foot, by cycle or public transport.
83. There has been ongoing discussion about the place of rail in the Christchurch transport system. We believe it is important that the corridors for bus transit or light rail be set aside now so that separated public transport can be constructed. Without such corridors the options for these alternatives that can avoid congested roads are limited.

Waste

84. We made a submission on the Draft Solid Waste Management Plan, and SOC is represented on the Zero Waste Working Party. Our submission to the Management Plan still applies, and the \$21m allocated for waste (page) should be put towards removing organic waste from landfill and reducing the total waste to landfill.

Water

85. The reliability and quality of water in Christchurch is of critical importance to the community. The water system must be viewed with a catchment focus, which means Christchurch City water supply and usage is not distinct from that of the rural area. The effects of our actions need to be understood by the whole catchment and conservation and allocation measures applied throughout.

86. Per capita the city residents use less water than in rural areas, especially where the land is irrigated. But demand management and conservation measures must be applied in both urban and rural areas.

87. We ask that the \$200,000 required for feasibility studies (page 74) into water re-use become a prioritised project.

88. We also ask that rain water collection systems and tanks be allowed for and encouraged in all parts of the Christchurch.

89. As many other cities in NZ practise, charging those who use water excessively is a sensible step in demand management. Meters are already installed in Christchurch and household usage recorded. Adding a charge per cubic metre used for households exceeding a reasonably generous allocation would raise the awareness of the value of water and would provide an impetus for behaviour change. **We ask that the introduction of water charging be included in this LTCCP.** We also suggest that new dwellings be encouraged to provide rainwater storage for primary use in garden watering and for domestic grey-water applications. This would ease peak urban stormwater discharge rates, and provide a first-call resource for garden watering – thus relieving demand on groundwater resources.

Biodiversity Strategy

90. \$25m for implementation of the Biodiversity Strategy has not been funded in this LTCCP (page 75). Local Government has international and domestic legal obligations to New Zealand's biodiversity and is required to be more responsive to community aspirations (recent amendments to RMA and Local Government Act).

91. While ecological restoration and landscaping have added valuable habitat to the city, some highly significant primary or natural habitat, along with critical populations of indigenous species, have drastically declined across the Canterbury Plains over the past decade, some of this on Christchurch's door step.

92. Both local and national opinion surveys (including Christchurch annual survey) have shown a steady increase in public valuation of native plants and animals.

93. There is a link between visibility and viability of nature; and there is an urgent need to break down the polarisation between nature and culture. There is also value placed on the 'garden city' image, and together these sentiments suggest a wish to see a familiar garden city framework with increased indigenous composition and visibility.

94. In this broader context, we question why implementation of the Biodiversity Strategy is being put on the back burner when it is fundamental to realisation of biodiversity obligations, it is what most people are expecting, and there is critical urgency in getting it implemented. It appears that flawed consultation processes have led the Council to flawed conclusions about what people want - contradicting Council's own survey data.

95. We therefore seek the following:

- a. Raise the Biodiversity Strategy to equal status with economic and social elements, expanding a Triple Bottom Line approach to a comprehensive Systems Approach - as outlined in SOC's presentation to the CCC seminar in March 2006. We are happy to provide further information and support for our position.**
- b. Implement key recommendations in the Biodiversity Strategy and provide the necessary funding;**
- c. Specifically acquire all possible leases in the Christchurch Airport to West Melton – Halkett block, in conjunction with ECan, in order to protect and manage the nationally rare and recently decimated dry plains grasslands biodiversity and classical plains landscape, eventually to be formulated as a unique plains park;**
- d. Establish a biodiversity partnership between Council and a subcommittee of Sustainable Otautahi Christchurch, following the model of ‘adopt a park’ groups and the London Biodiversity Partnership, to provide continual liaison, transparency and shared experience in biodiversity matters;**
- e. Desist from further undermining past Waterway Enhancement projects until there is proper consultation and review of the ecological and social rationale;**
- f. In view of recently announced environment structural changes in Council (for purposes of streamlining), ensure that there is an ecological audit for every greenfields development or effective flagging of biodiversity values – not just the top priority values as determined in the past when habitat loss had not progressed so far.**
- g. Ensure that all development and environmental management decisions go through a more sophisticated community engagement process (cf. <http://www.landcareresearch.co.nz/sal/partnerships.asp>).**

Tree Renewal

96. In contrast to the above, \$17. 2m for tree renewal has been included in the LTCCP (p 72).

97. While there is effective use of native herbaceous or shrubby species in swales and waterways in the newer suburbs there is a need for greater incorporation of the bigger native trees in the central city parks, older suburbs and to mark the portals and avenues into the city – both to substantially boost wildlife resources and contribute to New Zealand identity.

98. We ask that Council work to a target of indigenous ‘noble’ trees making up 25-50% of park, street, avenue and portal trees – current proportion is 17% (Stewart et al. 2004 – Urban Forestry & Urban greening 2: 149-158)

Avon Heathcote Estuary Ihutai Trust (page 74)

99. We support the Avon Heathcote Estuary Ihutai Trust in their submission for inclusion of funding for the implementation of the Ihutai Management Plan. The Management Plan developed by the community and supported by the City Council and ECan through their MOU provides an excellent model for community and council collaboration. By Council not contributing to some of the actions in the Management Plan will dissuade other voluntary organisations from investing their energy and time in such a process.

100. It would have been helpful if the LTCCP had included a section similar to that in ECan’s document, about Statutory Responsibilities (ECAN LTCCP p 105 Appendix 4).

Attachment 1.**Two opposing social paradigms.**

Dominant Paradigm/Mindset (Consumption-oriented)	Alternative/Emerging Paradigm/Mindset (Sustainability-promoting)
Core values	
Material (economic growth)	Nonmaterial (self-actualization)
Natural environment valued as resource	Natural environment intrinsically valued
Domination over nature	Harmony with nature
Economy	
Market forces	Public interest
Risk and reward	Safety
Differentials	Incomes related to need (egalitarian)
Individual self-help	Collective, social provision
Society	
Centralized	Public interest
Large-scale	Safety
Associational	Communal
Ordered	Flexible
Nature	
Ample reserves	Earth's resources limited
Nature hostile or neutral	Nature benign
Environment controllable	Nature delicately balanced
Knowledge	
Confidence in science and technology	Limits to science
Rationality of means	Rationality of ends
Separation of fact and value, thought and feeling	Integration of fact and value
Adapted from Cotgrove and Duff	

Attachment 2: Summary of Ecologically Sustainable Development
adapted from: Ronnie Harding (1998) *Environmental Decision-Making* pp. 27-29

ECOLOGICALLY SUSTAINABLE DEVELOPMENT Principles and Objectives
1. Integration of economic and environmental goals in policies and activities
2. Intergenerational equity
3. Conservation of biodiversity and ecological integrity
4. Recognising the global dimension
5. Dealing cautiously with risk and irreversibility (anticipatory and precautionary policy approach)
6. Ensuring that environmental assets are appropriately valued
7. Constant natural capital and 'sustainable income'
8. Social equity (intragenerational equity)
9. Limits on natural resource use
10. Qualitative Development
11. Efficiency
12. Economy which is resilient and has an increased capacity for environmental protection
13. International competitiveness and external balance
14. Community Participation

Attachment 3

Section 4 from AUSTRALIAN COMMISSIONER FOR ENVIRONMENTAL SUSTAINABILITY ACT 2003

What is Ecologically Sustainable development?

(1) Ecologically sustainable development is development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends.

(2) The **objectives** of ecologically sustainable development are—

(a) to enhance individual and community well-being and welfare by following a path of economic development that safeguards the welfare of future generations;

(b) to provide for equity within and between generations;

(c) to protect biological diversity and maintain essential ecological processes and life-support systems.

(3) The following are to be considered as **guiding principles** of ecologically sustainable development—

(a) that decision making processes should effectively integrate both long-term and short-term economic, environmental, social and equity considerations;

(b) if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation;

(c) the need to consider the global dimension of environmental impacts of actions and policies;

(d) the need to develop a strong, growing and diversified economy which can enhance the capacity for environment protection;

(e) the need to maintain and enhance international competitiveness in an environmentally sound manner;

(f) the need to adopt cost effective and flexible policy instruments such as improved valuation, pricing and incentive mechanisms;

(g) the need to facilitate community involvement in decisions and actions on issues that affect the community.