



**Submission on the
Christchurch Long Term Council
Community Plan 2009-2019**

From

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Submission from Sustainable Otautahi Christchurch, on the Christchurch City Council's Christchurch Long Term Council Community Plan 2009-2019

Introduction

SOC welcomes the opportunity to submit on the LTCCP. We make the point, however, that a time span of only 5 weeks from publication to close of submissions is far too short for people and organizations to do the study and consultation appropriate to such an important issue. We ask that in future, a minimum of 8 weeks be allowed for the process.

To enlarge on the reasons why we are making a submission, our website (www.sustainablechristchurch.org.nz) contains the following:

Sustainability in Christchurch, NZ

Why seek a more-sustainable Christchurch City and Canterbury region?

** For our children and grandchildren to have a healthy future they will need clean air, reliable fresh water supplies, productive nearby farmland, employment opportunities and a supportive society. We are concerned that present directions or trends will not guarantee these basic needs are satisfied. Are you worried too?*

** Future global challenges need to be imaginatively met at the local level. Such challenges include very high petrol prices for NZ when global production and reserves fail to meet growing demand (Peak Oil Production), and also rising sea level and more storm events from climate change. We will be forced into energy efficiency and reduced fossil fuel use sooner or later. Would you prefer to see action soon?*

** There are alternatives emerging that deserve encouragement through our choices made at home and work. We can support organic food production, for example, and renewable energy generation from sunshine and wind, facilities for safer cycling and walking within the city and social innovations such as farmers' markets, community gardens and co-housing. When advocating and educating for sustainability, we are optimists. Do you want to seek local solutions instead of feeling you are a part of the problem?*

Local Government Act 2002 and Community Outcomes Process

We note that the Local Government Act 2002 has (inter alia) the following section (emphasis added):

Part 1 - Preliminary provisions

3 Purpose

(d) provides for local authorities to play a broad role in promoting the social, economic, environmental, and cultural well-being of their communities, taking a sustainable development approach.

We searched the LTCCP for some clear links with the explicit LGA 2002 requirements to take “a sustainable development approach”, but could not identify any.

We also note that the City Council has a lead role to follow, in the Community Outcomes Process (COPs), which resulted in an articulation (in 9 Community Outcomes) of what the community wants. The Council is supposed to make clear what it is doing in achieving these outcomes. We could not find any clear links in the LTCCP with the Community Outcomes or further work on the COPs.

We submit: That clear links be identified between LTCCP, COPs, LGA 2002 and all aspects of the LTCCP be aligned with the LGA imperative to “take a sustainable development approach”.

Requirements for a Sustainable City

In 2009, two main factors, the imminence of Peak Oil (the increasing evidence that we are close to the end of cheap petroleum as an energy source) and the deeply unsustainable monetary troubles of especially the larger Western nations have combined with other factors show up what are probably terminal deficiencies in the **standard economic model**.

In the standard economic model (SEM), production and consumption in the economy are believed to be able to grow forever. This has been evidenced in the past, in NZ and elsewhere, by steady growth in GDP and a parallel and related steady increase in physical scales of resource use and waste production by the economy. In this model, there is very little consideration of the role of the supporting ecosystem. Nor does the standard economic model seriously consider the deeper needs of people and social structures, substituting for needs the promise of growth (i.e. greed) as the cure for all ills. In the standard economic model, environment and society are both endangered, with the result that the economy also suffers, long term. The SEM is known to be deeply unsustainable.

The **steady state economic model**, on the other hand, reflects the long-term sustainability imperative to take only that harvest of resources that can be supplied long-term from the surrounding environment, and emit only those wastes that can be assimilated long-term by that environment. In the SSE model, the cycles of production and consumption are in a long-term sustainable relationship with the surrounding environment. The key constraints on economic activity required to achieve sustainability in this economy are limits on the flows of energy and matter across the environment-economy boundary. Specifically, the flows of renewable resources must not exceed their long-term availability, the flows of waste must not exceed the assimilative capacity of the environmental waste treatment systems, and the use of nonrenewable resources (such as fossil fuels) must be associated with investment in capital plant for renewable resources to replace the fossil resources. The SSE model does not restrict – indeed, it positively encourages - improvement in social and individual quality of life in society.

The Christchurch Long Term Council Community Plan 2009-2019

Given that central aims in the LTCCP include continued adoption of growth in population, economic activity, urban land use, housing, transport and so on, it is very clear that the

Standard Economic Model is still firmly in the minds of the Council. As shown above, however, this model is inherently and inevitably unsustainable. While not all of the drivers of economic growth are under the control of local government, a commitment at the local level to adopt a Steady State Economy model would at least show that the LGA 2002's requirement to take "a sustainable development approach" was being acted upon. We see no such signal in the LTCCP, and hence its direction is at odds with the LGA 2002's requirements.

- **We submit: That the Christchurch City Council should adopt the Steady State Economy model as its basic analytical framework, and use it to work towards policies that reflect the LGA 2002 imperatives for "taking a sustainable development approach".**

As illustrations of our concern about the lack of attention paid to this aspect of the LGA 2002 and the Community Outcomes, we also note the following:

1. Public transport and roading improvements are considered together in the same paragraph (Summary p 4 and p 7). In our opinion, a strategic direction that takes "a sustainable development approach" would clearly separate them, since they are so different in nature and require markedly different policy initiatives. In the context of transport, we also refer to our Submission on the Draft Greater Christchurch Travel Demand Management Strategy, made to the City Council early in 2009, for further information on this important but deeply-unsustainable component of the City Council's strategic plans.

- **We submit: that public transport and roading be treated as largely separate issues.**

2. The plan for a Christchurch Agency for Energy trust, while consistent with the Energy Strategy, appears to ignore the existence in the city of a highly-experienced and successful non-government organization - Community Energy Action (CEA) - a trust which works in association with the Energy Efficiency and Conservation Authority, Orion, Meridian, Mainpower and Tasman Insulation. CEA has an established track record, and for the CCC to set up a competitive charitable trust appears to make little sense. A cooperative approach would surely be both more ethical and also more efficient, in that it would avoid setting up duplicate administrative structures. This component of the LTCCP does not, in our opinion, reflect what the community outcomes participants were looking for, in their commitment to "protect the natural environment".

- **We submit: That the Christchurch City Council engages in discussions with CEA to determine the possibility of a cooperative, synergic relationship with them.**

In relation to particular sections of the Summary document, we have submissions as follows:

Special Consultative Procedures

There are several SCPs on which SOC would like to comment:

1. Early learning centres.
 - **We submit that plans for outsourcing or selling the listed centres be put on hold until the criteria for City Council funding of these and related centres be clearly established.**
2. Tram extension route.
 - **We submit that this proposal is not a public transport issue and the allocation of \$11.5m should not be part of the LTCCP at this time of financial stringency.**
3. Transfer of the Town Hall to Vbase.
 - **We submit that this should not be proceeded with, because of the greater “distance” that will result between the Councillors (who represent the people) and the Town Hall administration.**
4. Infrastructure charitable trust. It is understood that this will be used to channel \$10m or more a year into infrastructure. This will be a complex change, and is to be put in place primarily for tax reasons.
 - **We submit that this should not be proceeded with, since among other reasons it has the potential to be a risky and an expensive move, when tax laws can be changed by the government at relatively short notice.**
5. Christchurch agency for energy (trust). See comments above.
6. Policy on determining “significance”. As described, this move would appear to considerably simplify current procedures, with rather vague ideas about process, to the extent that it looks as if it will not have any “teeth”, and risks being a policy to support “anything goes”. It also appears that the LTCCP proposed change removes an objective measure of significance, leaving only subjective measures, hence providing room for the avoidance of public input to important decisions. We question the wisdom of this.
 - **We submit that the current policy on “significance” should not be changed.**

Capital Projects

1. It is our understanding that it is planned (Summary p 8) to increase borrowing substantially, in order to keep rates rises low. We question this on two counts.
 - a. In the past, each generation has enjoyed the outcomes of earlier investments, at the same time as investing for the future. To benefit current generations via borrowing to limit rate increases will have the direct effect of placing extra (and greater, due to interest accumulation) burdens on future ratepayers. "Intergenerational equity" is a complex issue, which we feel should be considered very much more widely by the community at large than appears to have been the case.
 - b. Risk assessment of financial practices. Borrowing at a lower rate than the interest from City Council investments is probably valid in the short term, but is highly questionable in the longer term. This is especially the case when "taking a sustainable development approach".
 - **We submit that in these two areas in particular, much greater community consultation is needed before going ahead.**

2. Convention centre expansion of \$45m, with the expectation of government funding of another \$40m would appear to be inadvisable. Not only is it highly questionable, in these financially-stressed times, whether such an expansion is needed or appropriate, but also the likelihood of such a large government funding contribution appears to be less than realistic.
 - **We submit that this proposal be shelved.**

3. Bus priorities. It is our opinion that not enough attention is being given to the long-term viability of buses as the central component of public transport in Christchurch. We strongly support the new Bus Exchange project, but would make the point that of itself it will not be enough; it will require a major rethink – and appropriate investment in – the associated structures needed to ensure buses carrying large numbers of people have priority.

- **We submit that further work is needed in this area, with the expectation of increased capital investment at an early stage.**

Other Issues

1. Community Grants Funding

We understand that community grants funding is actually being reduced by \$1.5m, in that this account is being deducted as an administration fee. There is also no allowance for inflation over time in community grants, which effectively reduces the money available in the future when every other figure in the LTCCP is inflation adjusted over the 10 years.

The proposed move would also be a retrograde step, since it is a well-documented fact that the (direct and indirect) benefits, including but not solely financial, from community organizations far outweigh the direct monetary costs to the council. Only small savings would eventuate for the council, but serious damage would be likely, to the many nongovernment organizations, which depend on these grants to supplement their own small budgets and also their ability to catalyse many other activities.

Much has been made of the role of Community Boards in supporting local initiatives. The Council needs to have an integrated strategy that draws together the stories of success from community-initiated activities that are local as well as those that are city-wide.

- **We submit that community grants be held at least at the current level, preferably increased and also corrected for inflation, to allow for the Council to truly reflect its legal imperative under the LGA 2002 section 10 (a) to enable democratic local decision-making and action by, and on behalf of, communities;**

2. Treaty of Waitangi

We have searched the LTCCP and can find no reference to the Crown's responsibility to take account of the Treaty of Waitangi (Part 4, LGA 2002).

- **We submit that the LTCCP should include a section on this.**

We thank the Council for the opportunity to present our submission.

We wish to be heard in support of this Submission.