



Environment Network Manawatu  
PO Box 1271  
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24 April 2015

Palmerston North City Council  
Private Bag 11034  
Palmerston North

## **Submission on PNCC 10 Year Plan 2015-25**

Environment Network Manawatu thanks you for the opportunity to make a submission on PNCC's long term plan 2015-25. Our submission has several parts:

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This submission refers to the primary consultation document "A balanced future" as *Consultation* and the 386-page supporting material as *Supporting*, with page references for this latter document referring to the full document rather than the individually paginated elements within it.

## 1.0 About Environment Network Manawatu

Environment Network Manawatu (ENM) is a charitable umbrella organisation dedicated to enhancing the Manawatu environment. We receive funding from PNCC, Lotteries, ECCT, COGS, and project funding from additional organisations. We currently have forty-six member groups, forty of whom are currently based in and/or routinely active in Palmerston North. This submission has been written in response to initial comment on the plan from our member groups. It has been revised in response to further member group feedback.

## 2.0 General Comments

ENM fully supports PNCC's top-level Sustainable City Strategy, and this submission is in keeping with that strategy, its vision, and its goals (*Supporting* p.7).

We submit that environmental sustainability drives the other two goals of social-cultural and economic sustainability, because the environment is the foundation and context for where we live. Note, for example:

- Across Europe, North America, and Australia, those cities that have chosen to invest in a transformative approach to sustainability have become most desirable places to live, and those with the earliest start down this pathway now have proven to attract new entrepreneurial activity, often of the low-impact, professional variety that has the flexibility to relocate anywhere.
- Active transport, when safe enough to counteract the risk of accidental injury, has proven health benefits that reduce the costs of the public health system.
- The health benefits of clean air and water accrue to everyone.
- Studies are now even quantifying the positive health impacts of access to natural environments<sup>1</sup>.
- Our region's indigenous culture is rooted in the environment. Cultural and ecological health are connected.

Our general support for PNCC's strategic direction is tempered by our desire that PNCC do more to become a leader in sustainability. We submit that this requires more action than is currently planned to reduce our ecological impact and to support environmental restoration. We further submit that while the Sustainable City Strategy is transformative in its vision, the 10-year plan's primary focus on existing levels of service, asset management, and population growth (*Supporting* p.19) is overly indicative of a business-as-usual approach that misses out on an opportunity to make the most of our unique environment.

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1 As just one of several possible examples, a study from the Universities of Edinburgh and Glasgow recently found that access to parks is a key measure for lessening the gap between the quality of life of those with disparate incomes. See Dugan, Emily. 22 April 2015. "Living Near a Park Leads to a Better Life -- Study." *The New Zealand Herald*. Online. [http://www.nzherald.co.nz/health/news/article.cfm?c\\_id=204&objectid=11436346](http://www.nzherald.co.nz/health/news/article.cfm?c_id=204&objectid=11436346). Accessed 24 April 2015. Other studies point specifically to the benefits of access to forests.

In so many ways, Palmerston North is an ideal place to live and work. In addition to our central location, we are buffered, here, from the impact of rising sea levels. The Manawatu River is our core asset, the reason this city came into being. We additionally boast the utterly unique Manawatu Gorge and immediate proximity to mountain ranges. We ask for bolder leadership to make the most of our environment by seriously re-assessing how the principles of sustainability can be woven into **all** aspects of council business, and by accordingly reprioritising spending goals over the next 10-year period.

Toward this end, we applaud steps that Council is already taking, including improvements to cycleways; support for biodiversity projects such as those at the Ashhurst Domain, the Kahuterawa and Turitea, and urban areas such as Pit Park; and regional leadership in supporting the community-based environmental sector. Yet we submit that much more is required, especially in terms of improvements to water quality (wastewater, storm water, and catchment care) and more extensive support of, and quicker change toward, a safe, convenient, and attractive integrated transport system.

The potential benefits of stronger leadership for sustainability are significant and enticing. A city that innovates to transform itself for ecological sustainability will quickly become, in the fullest sense, a wealthy city.

### **3.0 Specific Comments**

#### **3.1 Climate Change**

We encourage PNCC to commit to mitigating climate change by setting targets for Council's own carbon footprint or greenhouse gas emissions. Our society needs more leadership by example, not more expressions of concern. Ideally PNCC would follow the example of cities elsewhere (e.g. Vancouver, Canada) that have committed to becoming carbon neutral within the near-term.

One potentially serious impact of climate change is the prospect of more regular water shortages. The 30-year Infrastructure Strategy notes that water restriction measures may “occur on a more frequent basis” but proposes no plan to address this (*Supporting* p.41). ENM support the council taking a proactive approach to water management, through public education and Level 1 water restrictions every summer to prepare for the possibility of prolonged, late-summer droughts.

One way to make such restrictions more acceptable to the public (while supporting additional sustainability goals) would be to provide subsidies on water tanks, following the example of other councils (such as Kapiti District Council). We are supportive of Council's recent "free water tank" initiative. In our view this was sufficiently successful to warrant something on a broader scale. We are grateful to have had the opportunity to raffle a tank on behalf of Council at the Festival of Cultures, and we note that many of those we talked to had been keen to install a tank for some time but did not find them affordable.

Finally, climate change provides an imperative for increased catchment care initiatives (planting for flood mitigation) and better active and multi-user transport, both of which will be discussed later in our submission.

### 3.2 Direction Setting

We agree with Council's comment that "Sustainability cannot be achieved by the council working on its own. Hence this activity also has a role in education and communication with the public on living more sustainably" (*Supporting p.79*).

We are generally supportive of all the items under Direction Setting (*Supporting p.84*), and we wish to note, in particular, the following:

- 751 Research into Sustainability Issues
- 764 Sustainability Awareness Raising
- 765 Ridepro Carpooling Initiative

We ask why the following education projects were left out of the plan:

- 974 Public Education - Rubbish and Recycling - Enhanced
- 1169 Public Education - Water - Enhanced
- 1156 Public Education - Wastewater - Enhanced
- 1066 Pubic Education - Stormwater - Enhanced.

We also note our support for outcomes delivered through the Eco-Design Advisor and the Sustainability Coordinator.

We respect Council's decisions about how to structure its service delivery going forward. We do, however, wish to note that the following are quite important to our network.

- We ask for a clear point of Council contact to make it easy for the council and the community sector to work cooperatively toward delivering public education.
- Like the council, we want expenditures on public education to be effective in changing attitudes and behaviours, and we have an interest in the design of education programmes for this reason. .

As a network, we are deeply grateful for our ability to work with Council on public outreach initiatives, and we wish to note in particular how the Sustainability Coordinator has played an important role in direct Council outreach (e.g. on how households can adopt better practices for water quality), in cooperative Council-community initiatives (e.g. the Climate Day of Action), and in supporting community-based sustainability initiatives (e.g. RECAP sustainability workshops). We hope similar support for the community-based environmental sector and for public awareness remains available. We note the downsizing of the 2014 and 2015 Reel Earth Film Festivals, and the cancellation of the 2014 Harvest Festival. The community sector is renowned for doing more with less, and we regret how much community energy is lost when community activities are undermined by insufficient funding.

### 3.3 Cemeteries

We disagree with the statement that there "are no significant negative effects" from providing cemeteries (*Supporting p.86*). Current methods of burial have long-term negative impacts, such as toxic loading of the soil and the inability to ever use the land for other purposes. We advocate for the establishment of natural burial cemeteries as the increasing norm, and specifically request the inclusion of this project:

- 484 Natural Burial Cemetery

### 3.4 Parks, Sport, and Recreation

The Environment Network Manawatu generally supports urban green space and especially biodiversity and habitat enhancement, edibles planting, and community gardens. We are also generally supportive of all walkways enhancement projects. We encourage tree planting programmes to take these values into account, especially the need for food sources for birds and invertebrates, taking into account seasonal availability of different food sources.

We generally support maintaining established trees as well as planting in currently treeless areas. Planting programmes need to increase the extent of urban trees and wilderness-type parks, rather than just replacing those that are already present.

We support these particular projects:

- 1145 Green Corridors
- 1077 Biodiversity Enhancement through Native Planting on Council Parks and Reserves
- 94 Purchase of Land to Extend Walkways Network
- 268, 165, and 354 Kahuterawa and Arapuke Forest Park, including pest control and biodiversity protection and enhancement.
- 144, 163 Street tree planting
- 111 Edwards Pit Park, especially its biodiversity component
- 835 Ashhurst Domain biodiversity as a contribution to the Manawatu Gorge Project
- 1080 Biodiversity Strategy and increased funding for animal and plant pest control
- 967 Edibles Planting

We also support the Wildbase Recovery Centre project (*Supporting*, p123) but note that we have been unable to find the particular project ID for this activity.

We submit that additional budget should go toward project ID 1077.

We also advise caution in the expenditure for animal and plant pest control budget under project ID 1080. Pest control needs to be planned and implemented strategically with long-term outcomes in mind to avoid back-sliding and wasting earlier expenditures. It is possible that initial investments can be maintained with fewer funds when the implementation is done strategically with that aim in mind. We are aware that the city has at times invested in pest control, then chosen to discontinue or reduce its planned control, thereby losing the ground it had gained (e.g. tradescantia control at the Ashhurst Domain).

We are supportive of developing areas where urban dwellers can easily access a wilderness-type area. We note appreciatively that PNCC has been a big supporter of Edwards Pit Park plantings, and we ask that PNCC look for sites with similar potential elsewhere, especially along the river. Waitoetoe Park has great potential for further enhancement and protection as a biodiversity reserve, especially if greater formal council protection could be combined with greater community involvement.

Finally, we also fully support:

- 1076 Junior Road Safety Park

We note, however, that public education will not achieve cycle safety where there are no safe options available.

### **3.5 Regulatory Control of Cats**

We encourage control of cats to be added to control of dogs (*Supporting* p.134). Managing cats could have positive outcomes for biodiversity especially the birds that are common in our urban environment. Regulatory control of cats has been established as commonplace elsewhere (e.g. Australia).

### **3.6 Roads, Parking, and Buses**

We congratulate the council on putting together their draft Integrated Transport Strategy (ITS) (*Supporting* pp.141) and ask that the Council take clear steps toward implementing it, noting with some concern that the strategy has not yet been finalised (p.143). We would like to see a clear strategy shaping Council's targets (see pp.144-145) and guiding implementation. Measures of vehicle travel (either city-wide or focussed on the central city) and targets for its reduction would be a good start.

We agree with Council (pp.141-142) that roads and parking have many negative impacts. We submit that proposed mitigations are too small-scale, and we encourage a deeper application of sustainability principles. For example, we request the development of electric car charging stations. Overall, the most effective approach is to provide incentives for cycling, walking, and public transport.

We therefore support the following measures, not all of which are included in the draft LTP.

- The provision of a central bus terminal for urban and regional buses, in close proximity to the city centre to help contribute to centre vibrancy. We note that the temporary location of the regional bus terminal in The Square has led to increased numbers of people in this area, which is beneficial for the city centre from a place-making point of view.
- Changing the timing of the construction of the terminal so that it is prepared for the enhanced bus service that Horizons intends to deliver from 2017/18. PNCC should bring forward its bus terminal construction by two years to avoid negative public perceptions related to peak hour traffic issues, which would cause setbacks toward the goal of increased public use of the buses.
- Regular and consistent communication with Horizons to ensure that the provision of buses and the provision of infrastructure is aligned, and to advocate for a transition toward clean technology in buses operating within the PNCC area.
- The development of dedicated bus lanes in congested areas.

We are also greatly supportive of strategies to increase passenger transport, which could be undertaken together with Horizons. We support:

- 148 Bus stop improvements;
- 181 Shelter upgrades.

We also strongly recommend other measures to show that bus transport is given priority over other vehicle use. For example:

- Cutting out free all-day central city parking for commuters;
- Developing park-and-ride lots for commuters who are off the major bus routes, such as an Ashhurst lot for Pohangina Valley commuters;
- Investigating the behaviour changes that might follow from a free central city bus service, which potentially include flow-on improvements in ridership in the rest of the city.

We recommend an assessment of the cost savings that would come from lower road maintenance if increased public transport use resulted in a significant drop in private vehicle use on city streets. We note also that a good public transport system will future-proof our city against ongoing fluctuations in petrol prices.

We support installation of LED street lighting throughout the city (p.42).

### **3.7 Cycling and Walking**

ENM is fully supportive of all the projects extending the cycle- and walkway networks in the city, and especially to any that give priority to key linkages and ensuring safe routes. We congratulate the council for their initiative in this area and look forward to the separated cycle paths and walkways to outlying areas such as Longburn, Linton and Bunnythorpe, and also the cycle/pedestrian bridge over the Manawatu river. We submit that the advantages of these linkages warrant bringing their completion date forward a few years from 2021, perhaps to 2018.

We wish to emphasise how important it is that these linkages are done correctly. We note the safety of travel across the Fitzherbert Bridge to Massey University as an example of exemplary design. In contrast, we note that the Ashhurst community has no safe bicycle route to the cycleway ending at the Ashhurst Domain, and there is no safe way to get from Longburn Adventist or Longburn School to the Longburn cycleway. We ask that these hazardous areas be rectified promptly.

We also support the underpasses to be constructed at Botanical Road and Highbury Ave because the existing crossings are dangerous and difficult to use, and are a weak point in an otherwise fantastic cycle path/walkway. These projects are great for encouraging safe commuting, getting people outdoors and active, and the riverside cycle paths are connecting people with the river again in a way that has been missing from the city.

We support provision of additional cycle lanes throughout the city (eg. ID 1216), however, this support is conditional on providing cycle lanes that are safe. The current network of cycle lanes have the appearance of being tacked onto the edges of roads as an afterthought, and only where there is space. Many of these lanes on main routes leave cyclists with an unenviable choice: ride close to the left-hand side of the cycle lane to keep away from the passing heavy traffic and risk being 'doored' by people getting out of parked cars; or ride on the right-hand side of the cycle lane away from the parked cars but with no room for error with the traffic passing so close. Intersections have no consistency with how cycle lanes are



treated and it is often a case of Russian roulette where a cyclist takes their life into their own hands as they attempt to get through an intersection. In general we request better attention to continuously good quality on-road marking along links in the city, with near-term priority given to Botanical Road, Featherston Street, and linkages into the central business district and the Square and around all schools.

We note that previous PNCC plans have referred to making Palmerston North the best place to ride a bike but this concept is missing from the LTP. We support inclusion of this goal into the LTP. If we want to get people active and onto their bikes we need a serious rethink about our cycle network and how to make it as safe as possible. A cycle network that is only safe 50% of the time will not encourage non-cyclists to switch to cycling as a form of transport or leisure. The focus on separated cycle paths to outlying areas will increase the number of people cycling for leisure on these paths, but it will not increase the rate of people commuting to work by cycle.

We acknowledge that the separated cycleways that are ideal are not easy or even practical to establish retrospectively onto existing road networks. There are, however, definite improvements that can be made. We encourage the council to investigate how separated cycle lanes could be incorporated into the existing roading network. For example, placing the cycle lane between the footpath and the row of parked cars is a possibility on many of our streets.

ENM requests the creation of a Cycle Advisory Group, where active cyclists are regularly consulted on proposed changes or cyclists can provide feedback on areas of the network that are not working or unsafe.

### **3.8 Rubbish and Recycling**

The Long-term Plan suggests that Council is happy with business-as-usual with rubbish and recycling, and we are concerned that this is an indication that the Sustainable City Strategy is not fully guiding council planning.

Our comment is based on the target of diverting 75% of the waste that would otherwise be buried in landfills (*Supporting* p.152). The plan doesn't indicate what is currently diverted, and it does state that "no significant changes to the Rubbish and Recycling Activity are proposed during the next 10 years" (*ibid*).

We submit that the current rate of diversion of waste needs to be measured and presented and the strategies to get to 75% diversion need to be laid out. Positive steps to take include:

- creating a more user-friendly, multi-item drop-off stop than the one available on Fergusson Street, especially targeting hard-to-recycle/-reuse items;
- developing a green waste collection scheme;
- developing a food waste reduction programme for both commercial and residential properties;
- simplifying the process of best practice disposal of electronic and hazardous waste;
- minimising waste at source (we are supportive, for example, of a plastic bag surcharge);
- adopting more effective public education programmes that target and reinforce very specific behaviours.



We note that PNCC's current recycling scheme is a fantastic example of how public uptake will be high when recycling is easy. We just ask that the gaps in this programme be identified and addressed.

### **3.9 Stormwater**

We support the Council's aspiration noted in its 30-Year Infrastructure Strategy:

*the stormwater system is operated and maintained to reduce the adverse impact of stormwater drainage on the city and also to reduce contaminants getting into the stormwater system through debris and pollutant traps (Supporting p.36).*

We note that the Council has missed out on many opportunities to promote its stormwater goals, for example through historically allowing development too close to stream banks, allowing too many impermeable services within developments, and by working through the outdated 'out of sight, out of mind' mentality.

We are grateful for the recent shift in Council strategy, but we are concerned that the change is not taking place fast enough and is not fully integrated into Council's day-to-day practice. In support of your aim to achieve hydraulic neutrality with new development (*Supporting p.41*), we ask that Council do better on a consistent basis and that it makes low-impact development mandatory for both new developments and in-fill housing, as opposed to viewing low impact design as merely something to be encouraged.

We also query the extent of Council's commitments to retrofitting the existing stormwater system. For example, your plan notes that you can fit debris and pollutant traps where required (*Supporting p.159*). What is your trigger for these measures? Is the budget in lines 1060 and 1062 Stormwater Improvement Works sufficient to be oriented toward enhanced environmental performance on a city-wide basis? We ask that you ensure that they are.

### **3.10 Wastewater**

We submit that PNCC should sort out the wastewater issue once and for all, rather than simply making adjustments to an approach that needs to be overhauled. Taking the 'minimum required' approach is deferred maintenance of our core asset, and the cultural, social, environmental costs are far too high to pour money toward a solution that everyone knows will prove unsatisfactory and will require further change in just 13 years.

We therefore support immediate investigation of best practice treatment and disposal options for the city's wastewater, and movement toward upgrading in advance of our next consent, without deferring this until 2022/23 as currently indicated by ID 628.

As suggested in our general comments, we cannot emphasise enough the importance of river clean-up as the top priority for a city founded on the presence of the river. As noted in our section 4.0, "Low Priority Items," we are primarily requesting the exclusion of sports facilities to free up funding for sustainability. It is pertinent to note, therefore, that a vibrant river is also a recreational, sporting, and tourism site: for swimming, for boating, for fishing, and more, but only if the river is fit to visit. And of course the holistic value of the river is

much more extensive than these listed features, and far outweighs any built asset. Furthermore, a healthy river can sustain itself if treated appropriately, unlike a built asset. To call a river a good investment is an understatement.

#### **4.0 Low Priority Items to Exclude from the Plan**

We submit that the following items are low priority and should be removed from the plan to give greater priority to sustainability.

- 1041 We support PNCC's decision to leave out Maxwell's Line Cycle Lane, as we agree there are riskier cycle routes that need to be a higher priority for increased spending.
- 1127 The Victoria Esplanade Bonsai House does not have sufficiently broad appeal to warrant further expenditure. Revenue could also be obtained through sale of the existing bonsai collection.
- 990, 1051, 1082, 1083, 1084, 1194 The combined cost of Arena Manawatu expenditures over ten years is \$20m for both renewals and development, which is entirely disproportionate to its broad public value relative to other projects (e.g. water, transport).
- 1133 Artificial Sportsfield
- 1212 Hockey Turf (there are other available venues)

With respect to the sports expenditures, we note that the city's projected population growth is in the older age brackets, and additional walkway expenditures would better meet this group's recreational needs.

#### **5.0 Consultation Documents**

ENM would like to note the usefulness and transparency of last year's annual plan consultation document, which included specific line items and what had been budgeted against them alongside clear indications of what had been cut from previous years and what had been considered but not included. This year's documents are much less user-friendly by comparison, with the consultation document insufficiently informative and the supporting documents relatively unavailable and challenging to navigate. We realise that reporting requirements have changed recently, but we encourage Council to keep the standard it has set through past practice.

Additionally, we note how difficult it is to comment on Council targets for a Sustainable City when they are not defined prior to the final draft (for example, *Supporting* p.81). Although we recognise the challenge of producing these documents to a deadline, we submit that if Council's starting point was truly a vision for a more sustainable city, it would be relatively straightforward to provide targets around carbon neutrality, water quality, transportation, biodiversity, public education, food resilience, sustainable energy, and more.

We are particularly disappointed with the lack of transparency about the costs associated with the Arena Manawatu. The public consultation document does much to provide sombre comment on the costs associated with \$35m critical wastewater treatment upgrades (*Consultation Document* p.13) and to note its hesitancy around the original budget of \$9.6m for bus terminal expenditures (*ibid.* p.11, and without noting clearly that the budget has been decreased by several million dollars). When it comes to the Arena Manawatu, however, the

only commentary around the costs is: "Council has put up \$1m .... if ..." (*ibid.* p.11). Although some of the costs are spelled out in the table on page 12 of the consultation document, a proposal for expenditure of this magnitude should be clearly spelled out in one place. We also note that professional associations for technical writers generally recommend consistency in data reporting for ethical as well as communicative reasons. Because of the difficulty in calculating exactly how much funding is going towards the Arena, we submit that public responses to this consultation document cannot be used as an accurate gauge of public support for the Arena.

ENM is generally supportive of Council's positive track record for public engagement, and we particularly note the willingness of many Council Officers to engage in open ways that bring the community in as partners in responding to problems and creating solutions. This consultation document is backsliding, and on the heels of the poorly consulted and generally decried Broadway tree removal, we request the Council again rise to the open standard it has proven it can meet. One approach would be to ensure that any new project expenditures over a certain level were equally highlighted with costs in the plan, rather than cherry-picking which costs to highlight.

## **6.0 Speaking to Our Submission and Contact Information**

ENM would like to speak to our submission.

1st option: Tuesday, 12 May, 3:30-5:30  
2nd option: Monday, 11 May, 3:30-5:30  
3rd option: Tuesday, 12 May, 12:00-2:00

Please contact Sally Pearce at [coordinator@enm.org.nz](mailto:coordinator@enm.org.nz) regarding speaking times and about who will be speaking for ENM. Sally can also be reached at the ENM office, 06 355 0126.

## **Closing**

Thank you for the opportunity to make this submission. We are keen to continue working with Council and appreciate the invitation to participate in local decision-making.

Kind regards,



Alastair Cole, Chairperson  
Environment Network Manawatu