

SUSTAINABLE CITIES TRUST

Level 4, IBIS House
183 Hereford St
PO Box 4490
Christchurch

Phone 377 8566

Rex@sustainablecities.org.nz

We wish to talk to the main points in our written submissions at the hearings to be held between June 1 and June 11 2004.

1. TO BE OR NOT TO BE ... SUSTAINABLE

- 1.1 The pursuit of sustainability is a requirement of the 2002 Local Government Act. The draft LTCCP makes reference to pursuing sustainability and we welcome this.
- 1.2 However, the body of work is clearly based on the unsupportable assumption that the future will be very like the present. While this will almost certainly be true for the next few years, that is not the case for more distant time horizons.
- 1.3 This does not mean that the future is entirely unpredictable. Reputable analyses of the current situation and trends forecast demand for fossil fuels increasingly outstripping supply, with steep rises in the price of fossil-fuel-derived energy and all products and services containing an energy component and, consequently, significant economic and social disruption. Similar, but more remote, forecasts are made for other natural resources and ecosystem services.
- 1.4 The fossil fuel scenario ("Peak Oil Hypothesis") has huge implications for urban transport, the amount and nature of commuting, private car ownership and use in general, tourism and trade.
- 1.5 We cannot assume that science and technology will magically come to our rescue. At best, they can help ease our path to a new way of living. The only responsible approach is to attempt to "future-proof" our community as much as possible. This means adopting the well-known "Precautionary Principle".
- 1.6 The Council lacks a coherent framework for decision-making on sustainability. Local government in other parts of the world has used the Natural Step Framework (TNS) to good effect as a strategic tool.
- 1.7 The LTCCP makes no acknowledgement that natural systems provide models of successful sustainable systems, to be emulated ("bio-mimicry"), and includes no mention of accounting for the city's natural capital. One implication is that networked infrastructure, which is both costly to install and maintain and vulnerable in catastrophic events (e.g. earthquake), could be avoided by requiring and facilitating on-site treatment options.

- 1.8 The LTCCP makes no mention that 2005 – 2015 has been declared the International Decade of Education for Sustainable Development. This is an ideal vehicle for Council to demonstrate leadership and leverage resources to advance sustainability.

REQUESTS:

- **That Council adopts the Precautionary Principle, the Natural Step Framework, bio-mimicry and natural capital as the fundamental base for all of its planning.**
- **That Council works with key stakeholders, including Sustainable Cities, to develop a plan of action for education for sustainable development.**

2. DEMOCRACY, CONSULTATION AND COMMUNITY PARTICIPATION

- 2.1 The timeframe for submissions has been unrealistic. Four weeks may sound like a reasonable time in which to prepare a response, but the sheer volume of material out for consultation at present gives little opportunity for in-depth analysis and debate.
- 2.2 In future we would like to see more opportunities to meet and discuss the issues with Council's elected representatives and officials, through community workshops, presentations to special interest groups or even on-line discussions. It was disappointing that the main public presentations on the LTCCP at Our City and Christchurch South Library were of a general nature and gave no opportunity to go through the solid waste Action Plan in detail.
- 2.3 Sustainable Cities Trust is at the centre of an extensive network of organisations and individuals with interests and expertise in the myriad of issues of urban sustainability. The network ranges across sustainability-focussed colleagues (Sustainable Business Network, Sustainable Aotearoa NZ, Sustainable Development Forum, Agenda21 Forum, CRI and tertiary training and research institution personnel), social service and social change agencies (such as Tenants' Protection Association), environmental and planning groups (e.g. Christchurch Environment Centre, Community Gardens Association, Urban Design Forum, NZPI), community agencies (e.g. Residents' Associations, Te Whare Roimata), businesses (providers of more sustainable services/products/technologies, builders and property developers) and more.
- 2.4 We offer our services as community networkers, communicators and facilitators of community consultation (having performed this service for the Council in the past, most notably with the neighbourhoods and stakeholders potentially affected by social housing developments at Hornby and Beckenham).

REQUESTS:

- **That the Council in future allows more time, avenues and opportunities for consultation and discussion with the community**
- **That the Council utilise the services of community organisations such as Sustainable Cities to increase the reach and cost-effectiveness of its consultation processes.**

3. SOLID WASTE MANAGEMENT (Part 2 – Action Plan)

- 3.1 The Action Plan for solid waste management is an absolutely vital piece of work that requires wide consultation, explanation and debate.

General Comments

- 3.2 Overall the level of detail and the range of approaches in the Action Plan is encouraging. It shows increasing maturity in the Council's understanding of the fundamental principles of waste elimination, such as the need to work with industry and consumers to close the loop on waste, and the importance of digging ever-deeper into the waste stream to extract more and more of its value. The Action Plan also reflects a willingness to consider alternatives to Council-owned and Council-run waste systems, such as community-based composting. These responses are to be encouraged. We also welcome the banning of specific materials and the use of a broader range of tools and mechanisms, such as extended consumer responsibility, take-back programmes and promotion of minimum recycled content regulations.
- 3.3 We remain concerned at the overall reduction target for total solid waste (65% by 2020). We maintain that a zero target should be used for planning purposes and that 65 per cent is not sufficiently ambitious. We recommend the target be revised. We oppose the use of vague and non-specific waste minimisation outcomes such as "significant reductions" in landfilling (eg 6.3 Wood) and measures that "promote" separation of materials, such as wood waste at demolition and building systems. We support incentives and mechanisms that **require** this to occur.

Given the tight timeframe for responses, we have summarised our comments as follows:

3.4 We **strongly support** -

3.4.1 The concept of materials-separation at Resource Recovery Facilities (formerly Refuse Transfer Stations) for residential and commercial waste. The use of a "triage" process has been proven internationally to yield immediate reductions on total waste-to-landfill, and is a powerful education tool in its own right. We encourage Council to invest in top quality staff with strong customer relations skills to ensure this process is implemented smoothly, and we suggest regular monitoring of customer satisfaction.

3.4.2 Postponement of a city-wide residential organic waste service in favour of the proposed organic waste reduction trial (ref 6.1.1 d). This is important to provide the opportunity to encourage community-based initiatives, through existing groups, community expertise and individual enterprise.

3.4.3 Additional financial incentives for tipping separated organics, through differential charging (6.1.2. a)

3.4.4 Banning organics from landfill

3.4.5 Banning the use of the herbicide Clopyralid

- 3.4.6 Banning the landfilling for certain specific materials and items, for which suitable alternatives are provided
- 3.4.7 The establishment of a community waste minimisation fund, so that part of the Council's Waste Minimisation Fund can be channelled through schools and non-profit organisations to support grass-roots initiatives.
- 3.4.8 The emphasis being on small, local, innovative and entrepreneurial private operators as the basis for resource recovery and maximum added value at the proposed Resource Recovery Parks. The appropriate role for the RMF is as the catalyst, the incubator, not the "doer". (Symbiosis, not heirarchical relationships.)

3.5 We ***strongly encourage***

- 3.5.1 Further development of proposals to ban certain specific materials form landfill. We suggest that the first materials to be considered are: wool carpets (suitable for weed suppression), all plastics, gib-board offcuts, and disposable batteries (including alkaline batteries, possibly through an extended producer-responsibility programme).
- 3.5.2 A better rate of progress on the development of markets for kerbside recyclables, including polypropylene plastics (grade 5).
- 3.5.3 The development of further incentives for home-based organics processing, such as subsidised home composting, and incentives to use commercial services. We suggest active promotion of systems such as vermicomposting and Bokashi buckets, eg providing complimentary worm bins or buckets for households than can demonstrate genuine reductions in waste volumes.
- 3.5.4 Development of an enclosed processing facility for kitchen and putrescible waste. Christchurch is falling behind on the development of systems for organics – the lack of a putrescibles plant is a key weakness in the city's efforts to date. A bio-gas producing primary anaerobic digestion process followed by intensive artificial wetland treatment of waste water and vermicomposting of solid residue is likely to produce the best environmental, employment and financial results.
- 3.5.5 A stronger penalty and enforcement regime for illegal dumping
- 3.5.6 More public recycling bins for glass, cans and plastic bottles. These should be paired up with rubbish bins outside dairies, fast food outlets and in other public places such as parks.
- 3.5.7 Recycling and waste minimisation at major events (such as wine and food festivals, sports events, etc.) and a package of financial incentives that will encourage event organisers to take a "zero waste" approach.
- 3.5.8 Transparency in residential waste collection and disposal costs, by itemising all waste-related costs (black bags, optional new CCC services, etc.) on each rate demand.

- 3.5.9 Incentives and penalties to encourage sorting at source. For residential “resource discarders” this could take the form of regular winners of major prizes – IF they have complied fully with the sorting requirements.
- 3.6 We **oppose**:
- 3.6.1 Measures that “promote” separation of materials, such as wood waste at demolition and building systems. We support incentives and mechanisms that **require** this to occur.
- 3.6.2 The use of vague and non-specific waste minimisation outcomes such as “significant reductions” in landfilling (eg 6.3 Wood).
- 3.6.3 Any underlying assumptions that all of the desired outcomes can be achieved through incremental change.

4. METROPOLITAN CHRISTCHURCH TRANSPORT STATEMENT

- 4.1 The Christchurch Metropolitan Transport Statement will only have a moderate impact on improving sustainable transport modes. The correct catch phrases are used, small sums are directed to enhance travel demand programs and there is acceptance that walking, cycling and public transport can have an impact on reducing the number of trips travelled by car. Another notable achievement is the inclusion of the strategy to cover the total commuter catchment zone around the Christchurch City area. As we all know, travel does not stop at the city boundary.
- 4.2 It tends to assume a business-as-usual approach to transport, in which we will tend to go about our business forever, or at least the longer term, in much the same way as we do now. What happens when we run out of cheap oil and motoring costs quadruple? It’s entirely possible they will, and in that case the current expansion of the roading network, let alone future expansions, will be unnecessary.
- 4.3 Unfortunately the strategy is deficient in many areas. Most notably rail is not even considered as a means to reduce road congestion, funding for alternative modes as a percentage of the overall spend changes little from current day expenditures and many new initiatives such as bus priority do not receive appropriate priority for another 10 years. The strategy makes no serious attempt to change transport conditions other than for truck and car users in the first phase of the strategy. To change the status quo, larger amounts of money should be directed to more sustainable modes now. Tinkering at the edges will not be enough to alter travel behaviour. Good point! A major emphasis needs to be placed on creating connected pedestrian, cycling and bus networks across the city sooner rather than later.
- 4.4 Nor is there any mention of two wheeled motor vehicles – motorcycles and fuel-efficient motor scooters - and the role they might play in improved transport efficiency.

- 4.5 Sadly the strategy contains no vision to reduce the amount of car kilometres travelled. It would appear the underlying assumption is still based on the premise that it is essential for economic growth that the road network be as “efficient” as possible for motorised vehicles. Billions of dollars have been poured into road networks around the world. The congestion just keeps happening and the growth does as well. Christchurch would be better served maintaining the current road network to a high standard and cancelling the big-ticket road projects identified in this strategy. The sooner economic growth can be de-coupled from road building we will find savings that can be redirected to more sustainable transport and other community projects, enhancing the quality of life for all.

Shortcomings with the MCTS Strategy

General comments

4.6 What is Sustainable Transport?

Nowhere in the document is a sustainable transport system defined. UK academic John Whitelegg gives the best definition I have seen. A sustainable transport system should allocate 1/3 of its resources to pedestrian and cycling issues, 1/3 to public transport and the remaining third to motorised vehicles. Looking at the strategy proposed investment levels are 66% for roads, 12 % for passenger transport and 22% for pedestrian and cycling initiatives.

If investment strategies don't mirror this sustainability formula, how can we possibly attain a more sustainable transport system?

4.7 Who will bind councils to this strategy?

Is this strategy a waste of effort? On page four we are told that the statement is a non-statutory document. That means its contents are not binding, and can only as a guide to councillors on transport policy.

4.8 Are the car growth assumptions correct?

The strategy seems to be devised on the assumption that people will continue to buy more and more cars, therefore congestion will keep on increasing and roads will have to be built/alterd to reduce congestion. Is this a valid assumption? Oil is depleting faster than expected. Will the average citizen be able to afford more than one car into the future? I don't think we can just assume that petrol will always be as cheap as it is today. If people are price sensitive, the trends you predict may not happen. Past performance is not an accurate measure of future trends.

4.9 Is traffic congestion the main cause of pollution?

The strategy infers that to reduce pollution we need to keep cars running more freely. This in turn means we need to construct more roads to reduce congestion levels. Having more cars on the network creates more and more pollution. Whether they are stuck in traffic or not, pollution effects are increased by the addition of every new car to the network.

4.10 Why is congestion bad anyway?

Creating congestion may be a good way to get people to alter their travel habits. They may be able to choose to travel at a different time. If we are forever trying to solve congestion we just pile more and more cars onto the network because it is seen as the most efficient way to move about. Whilst your strategy does acknowledge we can never build our way out of congestion I think the strategy should actively create more congestion. Current multi lane roads should have lanes for buses and bikes only. When people see alternative modes offering superior service they are more inclined to change. This was proven in Perth. The northern suburbs rail line runs up the middle of a freeway. Even stopping at stations created a faster journey time than travelling the freeway into town. People switched modes.

4.11 Why is the rail network invisible?

The strategy doesn't mention rail once as a mode that could relieve pressure on roads. This is a major omission. Rail has the potential to replace many truck journeys that are made through Christchurch. If more freight traveled to Lyttelton Port by rail the need to upgrade the Port Hills Road and Opawa Road would not exist. This would possibly be true of many other arterial extensions planned for Christchurch. Now that the Central Government has declared interest in the rail network the council should be investigating how the rail infrastructure in Christchurch can be of more benefit to the transport system reducing the need to spend money on additional road projects.

4.12 How can anything ever change when the budgets reflect more of the same?

This transport statement is supposed to reflect a new direction for the city. Will anything change when the relative expenditure on sustainable transport modes remains almost the same as it is today? For instance the cycling budget increases from 2.3 % of total spending to 3.2% of total spending. The pedestrian budget remains constant at 13% over the 20-year period. The road budget drops from 71.5% to 65.8% and the public transport budget increases from 7.5 % to 10.9%.

4.13 Why do strategies sometimes use graphics that don't accurately reflect the reality?

For a novice reading this report the graph on page 19 would look very encouraging. It gives the impression that large sums of money are being spent to rectify the current spending imbalances for sustainable transport. On a closer look you can see that when spending increases from a very small base the impression is given that lots of money is being allocated to that item. I suggest this graph be removed from the report.

4.14 Are these budget levels as low as they appear?

The figures make it very unclear if these budgets only include ratepayers' money. Will more money be allocated from central government to supplement these amounts?

4.15 How many of the proposed roading projects are unnecessary?

Councils tend to be filled with engineers who mainly focus on road issues. This is probably a bit strong – it may be true but it is probably not helpful. Very few resources are allocated to public transport, cycling and pedestrian issues. Consequently when strategies like this are announced, the roading engineers have multiple projects in the pipeline and the other modes either very few or no initiatives. The roading wish lists attached to these budgets reflect this point. Multiple projects are listed. Does the city really need these projects?

One project in question is the Blenheim deviation. Why is \$6.7m being allocated for a project when an existing road already exists? Why do we need the Cranford Rd upgrade when we have the Northern Ring road as a bypass to this area? \$10.3 is allocated to this project. Council should focus more on maintaining existing road assets and not making further so called efficiency gains to the network. Money saved on these projects could be re-directed to alternative modes.

4.16 Where is the commitment to council Living Street Policy?

Where is the Living Street philosophy tied into this council strategy? According to council Living Street publications, council wishes to maintain existing level of service for motorists. This strategy infers council wishes to improve on existing service levels.

Council should maintain road standards to current day levels and focus on significant planning improvements to pedestrian, cycling and public transport initiatives.

Mode specific comments

BUSES

4.17 Why aren't bus priority measures given higher priority sooner?

The city urgently needs to address bus access. Unless the networks can be constantly improved (like the motor vehicle networks), more people will drive.

The strategy only allocates 2.4 million to bus priority in 2005-6. Larger sums of money only enter the budget from 2014-2023. Why isn't this expenditure occurring now? Many more of our streets need to be bus only. Multi lane roads need part and full-time bus lanes. Expenditure on this vital initiative needs to be started now.

The longer this is deferred, the harder it is to bring in these initiatives.

4.18 Where are the new bus interchanges?

Money is allocated for new bus interchanges. Again only small amounts of money are allocated to be spent over the next 6 years. Expenditure needs to be brought forward. Of prime importance is a new interchange at the University.

The strategy should list proposed locations of the new interchanges.

4.19 Why are the bus passenger targets so low?

Expenditure allocated indicates the council isn't very serious about getting more people to travel by bus. The strategy is only aiming for 46 bus trips per person per year by 2006. This level is very poor. It doesn't even equate to 1 trip per week by bus per person. Even a car dependant city like Canberra in Australia manages 80 trips per person!

4.20 Why isn't the shuttle service expanding?

In a bid to reduce further driving in the inner city why isn't another shuttle service proposed that links the west to the east? A route connecting the Botanic Gardens to the Polytechnic via Gloucester/Barbados/Madras Street would be useful.

4.21 Why isn't money allocated to improve bus frequencies?

The strategy indicates the council only commits part of its budget to improve bus infrastructure and run the shuttle service. Why isn't additional money used to improve bus frequency levels? It is no good spending money for more bus shelters so that each house is only a 500-metre walk from a stop if the services aren't there to make the bus trip more attractive.

CYCLING

4.22 Where are the main cycle networks? Are they complete routes?

Whilst a list of projects is planned for cycle improvements, how effective is this expenditure? Will any new networks be created that provide people with direct cycle only access to the main activity centres they are trying to reach? More emphasis needs to be placed on providing cyclists with comprehensive networks.

The strategy doesn't mention this or provide a performance measure.

PEDESTRIANS

4.23 Why are there no indicators to measure pedestrian access?

It seems to be taken for granted that pedestrians could access all parts of our city. Bridges particularly in the north of the city do not have adequate access. Effectively this means if you don't have a car you are severed from a part of the community. Priority needs to be given to create better pedestrian access over the Waimakariri River and the Styx Mill Bridge. Dislocated communities in Heathcote and Halswell also need better pedestrian access.

A comprehensive pedestrian audit needs to be completed for Christchurch that highlights all the major issues and sets into action a plan to rectify shortcomings.

4.24 What are the major projects that will be undertaken for pedestrian initiatives?

The strategy is supposed to highlight major initiatives. Not one major initiative is listed for pedestrians.

4.25 Where is the road user hierarchy?

Christchurch City's Living Streets program talks about creating a better balance. Pedestrian issues are placed first in planning decisions followed by cyclists, public transport, taxis, service vehicles and cars. No mention is made of this in the transport strategy.

4.26 Why are there no indicators to measure pedestrian efficiency?

Pedestrians are slowed down all the time by cars. Christchurch needs a measure to indicate improved traffic flows for pedestrian movements. For instance the number of puffin crossings installed, the number of traffic light sequences that have been improved to reduce pedestrian waiting times.

4.27 Why aren't pedestrian flows considered part of traffic management?

There is no mention of providing comprehensive signage for pedestrians. It is considered important for "road" users. There are many pedestrian shortcuts throughout Christchurch. If they were highlighted it could encourage more people to utilize the network.

4.28 Where are the targets to have more local streets 30km zones?

If we are trying to achieve safer streets, serious consideration has to be given to reducing speed limits further.

GENERAL COMMENTS

5. Pollutants and Waste Minimisation (Vol. 2 p.5-6)

5.1 The current suggestions do not appear to provide a penalty for polluters. There is increasing international support for imposing realistic costs upon polluters that includes components of existence value and reparation value. As a polluter, it would be in my 'best interests' to continue to pollute up to the point where the current penalty equals the cost of changing my approach. Unless 'encouraging' includes some form of penalty there is no economic incentive for change. This applies to residential and industrial scenarios.

5.2 Information fed back to the citizens about what has been 'saved' by the community and what has been done with the materials recovered from roadside collection (as "warm fuzzies") encourages future action.

5.3 Those without vehicles are severely limited in their options to manage large waste items.

6. The Learning City (Vol.2, p.7-9)

The current provision of services from the library network is to be commended, but staff are increasingly spending greater amounts of their time acting as IT trainers, helpdesk and troubleshooters rather than focussing on their core roles.

Unless the city increases the use of technology within our schools, we will not produce young adults who have enough skills to be 'useful' within the work place.

7. The Prosperous City (Vol.2, p. 9-10)

There is no direct mention of the voluntary sector within the indicators. Yet this sector enhances the basic services offered by the other sectors, often filling in the 'gaps'. The current trends appear to indicate a falling interest by people to 'donate' their services (from parents participating in school programmes through to collectors for recognised charities).

8. The Well-Governed City (Vol.2., p.11-12)

The participation of the general public in decision-making certainly needs to be reviewed concerning submission times after the production of complex documents. There is a need for workshops to explain the ramification of these documents to the community.

9. A Liveable City (Vol.2, p.21-22)

9.1 The promotion of medium to high density residential development is one approach to limiting urban sprawl and private transport dependence. However, it has to be done to a high standard and with land aggregation so that it is not piecemeal and so there is plenty of garden space and green space to provide a positive environment for the residents.

9.2 Promoting adoption of sustainable design principles is very laudable. However, unless there are direct incentives uptake will be slow.

10. We support the retention of community gardens in various neighbourhoods around the city and in particular the Strickland Street Garden, which currently has the opportunity to use a recently vacated Council-owned house next door. This garden project has considerable community value and can be used in educational ways that support Council policies for waste minimisation, for water efficiency and for a physically, socially and environmentally healthy Christchurch. We ask that no established garden site be sold but rather that the gardens are supported and protected.

11. We are opposed to Council spending on Lake Isaac, alternative lake locations or on research into these and wish to see the \$630,000 re-applied to a diversity of community projects. An example would be to contribute annually 5% of that sum (\$31,500) each to support the work of the Christchurch Environment Centre and Sustainable Cities.