



Submission: Christchurch City Council Annual Plan 2020-21
From: Friends of Banks Peninsula Incorporated
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We wish to be heard in support of our submission.

Introduction

Friends of Banks Peninsula is a community based environmental group, operating since 1990, and involved with many planning and environmental issues, particularly in the Akaroa area.

In making this submission, we recognise that the draft Annual Plan for 2020-21, is likely to change radically in light of the COVID-19 pandemic impact on our communities, Council revenue and recovery costs.

We submit that in these financially and environmentally difficult and uncertain times the priorities should be:

- Combining recovery from COVID-19 with a focus on mitigating and adapting to the Climate and Ecological Emergency.
- Investing in waste minimisation and recycling processing.
- Minimising risk - we identify the Wastewater projects in the Akaroa Harbour as high-risk, big ticket items that must be revisited.

1 Focus on climate resilience

The Council declared a Climate and Ecological Emergency in 2019. The Council's consultation document for the Annual Plan states that a Strategic Priority is "Meeting the challenge of climate change through every means available".

We can find no specific funding allocated in the Annual Plan to develop a Climate Change strategy, or for mitigation and adaption works. We would like to see more transparency in the consultation document and in the Annual Plan overviews and budgets to highlight such funding.

Priorities for climate strategy

We see the immediate priorities as:

- ensuring that COVID-19 economic recovery measures (such as destination management) take into account, and work to support, climate change mitigation and adaptation, including learning from reductions in emissions during the crisis;

- identifying Peninsula roads and other essential infrastructure that is vulnerable to sea-level rise and storm damage and instigating protection works.
- reduction of inflow and infiltration of storm and seawater into the sewage network in Akaroa to reduce the frequency of raw sewage overflows into the harbour, particularly given the increased frequency and ferocity of storms forecast.

Secure Water supplies

With the eastern South Island forecast to become more drought prone, we agree with the Council that securing water supplies is a priority for resilience. Akaroa and Duvauchelle have experienced full water restrictions again this summer. The water supply to Duvauchelle has broken down, meaning water has been trucked to Duvauchelle for months – an unsustainable practice with a very high carbon footprint.

We support the capital program Water Supply items 57804 to improve the Aylmers Valley Well and 57808 to improve the Duvauchelle water supply.

We also stress the linkage between potable water supplies and wastewater volume.

We would like to see homeowners and businesses incentivised to conserve water and would support measures that:

- encourage water conservation, including charging for usage above a base level; and,
- require all new builds, and encourage existing building owners, to include rain water collection systems for non-potable use. In addition new builds in Akaroa should incorporate ‘purple pipe’ capacity to enable reuse of treated wastewater in the future.

In our previous submission to the Akaroa Wastewater consultation we stressed the opportunity for the re-use of treated wastewater to alleviate the summer water shortages in Akaroa township, and still suggest that this is the optimal use of the water. A review of wastewater proposals should give utmost thought as to how the treatment standard could be improved to facilitate this, ways to create an economical distribution network, and cost effective disposal of surplus wastewater in winter.

Support indigenous biodiversity and carbon sequestration

Banks Peninsula provides Christchurch with opportunities to address the Climate and Ecological Emergency through enhancing and increasing biodiversity in tandem with sequestering carbon. We submit that a Climate Change strategy

- recognises and finds ways to maximise the opportunity that Banks Peninsula provides to Christchurch City as a carbon sink
- supports measures to protect and enhance the native biodiversity of the area, particularly through the growth of naturally regenerating forest, as an ecologically sound way to absorb carbon and mitigate a percentage of emissions from the city.

REQUESTS:

We request that the Annual Plan 2020/21 identifies a funding stream under Strategic Planning for the development of the Climate Change Strategy to enable the Council to achieve its emissions reductions targets and to identify the key areas where adaptation or retreat will be needed.

We would then expect this plan to feed into the development of the 2021 Long Term Plan with projects that begin the actual work of both mitigation and adaptation across the different Council funding categories.

2 Invest in Waste Minimisation and Recycling Processing.

Friends of Banks Peninsula set up the first recycling facility in Akaroa almost 30 years ago and maintains a close interest in waste reduction and safe disposal.

With the loss of overseas markets for recyclable materials, it is vital that facilities for processing recycling are established within New Zealand. As well as the environmental benefits of resource recovery, reduction in landfill waste and lower transport emissions, investment in onshore processing will provide economic stimulus and employment.

REQUESTS:

We request that the Council develops and adopts its waste minimisation strategy as a matter of urgency.

We request that the Council, in conjunction with other agencies as appropriate, commits to the development of recycling and waste processing facilities as a matter of urgency.

3 Revisit expensive, risky Akaroa and Duvauchelle Wastewater projects

Friends of Banks Peninsula has been involved with the Akaroa Wastewater issue for many years. We recognise that the treatment and disposal of wastewater is a complex problem with no easy answers.

The Akaroa wastewater project has been struggling since 2015, with funds allocated for capital works being used on continued investigations. The draft 2020-21 Annual Plan signals that further delays are anticipated to work that was proposed for 2020-21. We are aware that this project is set to require substantial budget increases in the next LTP, and that there are similar problems with the Duvauchelle scheme.

Already expensive projects facing massive budget increases:

The project budgets of \$35 million for Akaroa and \$4.7 million for Duvauchelle wastewater projects will need to be substantially increased due to the difficulties of finding suitable land based sites and the increased volumes of water that must now be designed for.

For the proposed Akaroa scheme, the most recent budget projections indicate an increase of approximately 31% for a harbour outfall, 56% for the lowest cost land disposal option. There are 1000 connections in Akaroa, giving a current probable cost per connection of at least \$47,000 for a harbour outfall or \$56,000 for the lowest cost land based solution. Other, potentially more socially acceptable, land based options that are being investigated are likely to be even more expensive.

Complex problem getting more complex

- Investigations and two rounds of consultation over the past 5 years have shown the steep, slip prone terrain of Banks Peninsula is largely unsuited to land disposal. The Council has been unable to find geotechnically suitable land disposal sites within the Inner Harbour that do not severely impinge on existing communities and infrastructure. Along with the inherent risks of disposing of large volumes of water in an area that is very susceptible to land subsidence and flooding, land disposal takes up land that is increasingly important for other productive uses.
- The volume of wastewater the Akaroa system must be designed for is almost double that anticipated in 2015 due to faulty baseline measurement, and we understand that the Duvauchelle scheme is in a similar situation.
- Substantial reduction of the large volume of inflow and infiltration of storm and groundwater into the Akaroa wastewater network is an essential component of any inner harbour land disposal scheme, but achieving this is complex and expensive.

Compromising Akaroa's recovery

Akaroa's economy relies principally on tourism and will be hard hit by the Covid-19 pandemic.

The proposed new treatment plant for Akaroa involves:

- a prominent terminal pump station sited at the entrance to the town, in close proximity to community and visitor facilities
- this pump station needs to be opened on a regular basis to remove solids, with potential to release odours in the town, prior to pumping to the treatment plant;
- the raw wastewater will then be pumped 160m to the top of the Takamatua Hill where a raw wastewater storage pond and treatment plant will be sited close to the main highway;
- streets of Akaroa will require extensive road works as the sewage pipes must be laid to head in the opposite direction to the current network.

We flag our concern about the impacts during construction and ongoing impacts of placing the treatment ponds, pumps and plants in such prominent locations at a time when Akaroa needs to look its best to attract visitors and rebuild its economy. Peace and quiet, scenic beauty and 'getting away from it all' have long been Akaroa's top attractions for the local and domestic tourism market, on which Akaroa will now be reliant for some time to come.

The proposed new land based disposal system for Duvauchelle involves deconstructing the golf course and removing existing mature trees, relocating the showgrounds, and installing wastewater irrigation and storage into these community and visitor facilities.

Less resilient than current system

We are concerned that the proposed system for Akaroa will be less resilient to climate change impacts such as sea level rise, storm surges and electricity outages.

- the terminal pump station will be sited on a former coastal landfill; and,
- the system is more reliant on a good electricity supply to pump raw sewage up to the hill than the current gravity fed system.

We are concerned about the ongoing risk of failure, including raw sewage spills, because the coastal landfill is vulnerable to flooding and sea level rise (the Fox River incident in 2019 has raised national awareness of this issue). Electricity supplies to the Peninsula are already much less reliable than for urban areas and, with increased intensity and frequency of storms, are vulnerable to long outages.

Heightened awareness of virus threat

A continuing matter of community concern has been the treatment standard of the wastewater. The treatment proposed in both plants does not guarantee virus removal. Given the heightened awareness of the impact of viral pandemic, we submit that the design of the treatment plants, including treatment standards and the risks of disposal of wastewater within communities must be re-examined.

REQUESTS:

We request that both these expensive projects, including any public consultation process, are deferred and put on hold while the Council and the Akaroa community take stock and recover from the Covid-19 crisis.

We request a full review of both projects taking into account the risks associated with climate change and the social costs of the project and suggest that this takes place while the Akaroa economy recovers and the Council gains a better understanding of the new economic and world order.

We request that in the interim the existing treatment plants are upgraded to ensure a treatment standard that better meets their consent conditions, and keeping in mind that demand is likely to be considerably lowered due to decreased tourism loading. The existing treatment plants and harbour outfalls will need to continue to operate during the design and construction of any new scheme - 3 to 5 more years at least - so this investment is essential regardless of eventual treatment and disposal decisions.

We request that work to identify and reduce Inflow and Infiltration into Akaroa's wastewater system is continued as a matter of urgency, with appropriate funding provided for this.