



## BRCT submission on ORC Regional Policy Statement

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RPS Review  
Otago Regional Council  
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### Executive Summary

BRCT appreciates the opportunity to submit on the **ORC Regional Policy Statement**. BRCT is a registered charitable trust formed in 2008 to support local sustainability and transition initiatives in a planned and structured way. Our current core activity is supporting the development of a resilient energy system in Blueskin Bay, while we actively work on Climate Change mitigation and adaptation. We also provide services for people and community groups in our area and in Dunedin. Jeanette Fitzsimons is our patron.

We understand that Climate Change is presenting as a huge responsibility and burden for local government. We also see the role the Otago Regional Council has as an enabler is critical in moving towards a successful low carbon future.

In the Blueskin settlements, many residents are understandably concerned about Climate Change, sea-level rise, flooding, and new hazard mapping and risk management plans. We now know that stable coast lines are a thing of the past, and that we must adapt to a more dynamic environment and landscape, but we don't yet know the extent of adaptation required, or the full extent of sea-level rise. We only know that if we continue to emit carbon from fossil fuels, the future will be very bleak.

We've made a number of recommendations, the first of which calls for a greater degree of collaboration or partnership with community organisations such as ours which are at the front line of adaptation to Climate Change and engaged in mitigation activities. We also discuss Objectives in each section.

We thank you for this opportunity to make a submission on the Regional Policy Statement and support the Otago Regional Council in its work to set a positive direction for future work.

## Part B2: Objectives 2.1, 2.2 and 2.3

We are strongly supportive of all the policies designed to deliver Objectives 2.1, 2.2, 2.3. Climate Change is by far and away the most significant and long term challenge our settlements and our community face(s). History holds no lessons for us in a future of shifting coastlines, and increasingly erratic weather – we now live in a changed and changing world, with 30-40cm sea-level rise predicted by 2050<sup>1</sup> and much more beyond that.

Nationally, in 'Natural Resources Sector 2014 Briefing to the Incoming Ministers', Ministers of the Crown learned that "*we are off track in transitioning to a low carbon future, and there is increasing international pressure to reduce emissions*"<sup>2</sup>. It appears however that it is local government, rather than national government, which must bear the burden and take the lead in mitigating Climate Change impacts and adapting to Climate Change, in the absence of any central government leadership.

All stated policies in the RPS to reduce exposure to risk are positive, however we strongly encourage prioritisation of policy that will have the most impact. Heavy restrictions on building in flood prone zones must be a priority, as must provision for relocation and resettlement on higher ground. Careful thought must also be given to maintaining lifelines, such as the provision of electricity, transport links and food supply (including maintenance of productive land close to residential centres).

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<sup>1</sup> PCE 2014, Changing climate and rising seas: understanding the science

<sup>2</sup> <http://nrs.mfe.govt.nz/sites/default/files/nrs-bim-final.pdf>, pp.9

We strongly support “risk management approaches that reduce the need for hard mitigation structures and similar engineering interventions”.

*Achieving Objectives 2.1, 2.2 and 2.3 will require an adaptive, collaborative approach, much as set out in the NIWA “Engaging Communities: Make It Work” model<sup>3</sup>. We believe that partnering with community delivery agencies will enable effective actions to achieve Objectives.*

## Part B2: Objective 2.4

BRCT’s charitable company Blueskin Energy Ltd is working on building a small community wind farm at Blueskin Bay. This proposed infrastructural development is intended to:

- Supply more than the current (annual) community electricity demand through local distributed generation;
- Build resilience into the local electricity network, through increasing security of supply at a local level;
- Contribute to lowering NZ’s greenhouse gas emissions, by introducing more renewable electricity into the electricity market and forcing out the equivalent quantity of thermal generation;
- Build an income stream to help us adapt to future challenges and provide our community with a certain autonomy of action;
- Have minimal to negligible adverse effects and significant positive effects.

We have been working on our project for some years, and have significant community support for the proposed siting of our small wind development. We believe it is a nationally significant project, in that it is the first of its type in New Zealand, and if successful, will provide impetus for positive change all around New Zealand.

*We would like to see provision to support for community-scale renewable electricity generation strengthened in the RPS.*

Petroleum exploration off the Otago coastline will compromise the reputation of New Zealand and the safety of our marine environment which is important to local economies, fishing, scientific investigation and marine/ coastal tourism. It is also a process of exploration for fossil fuels which are fossil fuels that cannot in all conscience be burnt if we are to have any chance of maintaining an environment suitable for human life.

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<sup>3</sup> NIWA 2011a. Coastal Adaptation to Climate Change – Engaging communities; making it work, prepared for MSI contract CO1X0802, December 2011.

*We seek the establishment of a fossil fuel reserve off the Otago Coast, where fossil fuel reserves are assumed to exist (even without evidence) and are therefore protected as preserved, unburnable carbon assets.*

*We support all development of public transport options, and increasing the availability of public transport for all Dunedin residents.*

*We support the promotion of Energy Efficiency and believe that the Cosy Homes initiative and the Dunedin City Energy Plan are two clear pathways to achieve this policy. We suggest working closely with the Cosy Homes group and the Energy Plan team at the DCC as well as the Chamber of Commerce's Energy Committee to develop methods for this section of policy.*

Finally, wherever possible we request that the ORC actively invests in supporting the development of alternative energies and technologies to fuel its transport requirements, reports progress towards alternatives to oil dependence to the community and uses this as demonstrable evidence of ORC walking the talk.

### Part B3: Objective 3.1

Poor water quality is a growing and extremely significant issue in New Zealand. 40% of our wetlands are gone, 43% of our rivers fail to meet bathing standards, and between 18,000 and 30,000 people each year contract waterborne diseases from microbial contamination, reports Environmental Scientist Mike Joy<sup>4</sup>.

*We see improving the quality of our waterways as a priority issue.*

*The protection of soil quality is something we wholeheartedly support, and we value the ORC placing importance on it. Accelerated soil erosion (that created by humans), frontier production expansion into previously wild zones, and technological change leading to compaction and impoverishment of soils, are all issues that need addressing and we particularly support policy 3.1.5 'Protecting Soil Quality'.*

*In relation to air quality, we would like to see a wholesale ban on coal burning throughout the ORC's jurisdiction, and a supportive environment for wood burning technologies that is permissive rather than restrictive.*

### Part B3: Objective 3.2

Our community is already facing the challenge of a managed retreat from low-lying, flood prone land that is also very susceptible to any change in sea levels. Thus, it is doubly important that 'Resources are used efficiently and in a way that minimises

<sup>4</sup> See: <http://freshwater.science.org.nz/index.php/news/media7-tv-interview-with-environmental-scientist-mike-joy-talks-about-water-quality-in-new-zealand/>

conflict'. The stresses our community now face and will increasingly face as Climate Change becomes more pronounced, will only increase further if we do not address the underlying issue of Climate Change.

We are heading to a future of increasingly extreme climate change effects. *Climate Change emissions reduction must be the lens through which we consider appropriate resource use.*

*We particularly support the 'development of community solutions, including infrastructure development, where this will minimise the community's cumulative impact' (in policy 3.2.4).*

### Part B3: Objective 3.5 and 3.6

*We support the development of 'good quality infrastructure [meeting] community needs'. In particular, we would value emphasis being placed on increasing 'the ability of communities to respond and adapt to emergencies'.*

We believe that future residential development should have as a focus, "sustainability", with an emphasis on ensuring future build has designed for emergencies, for efficiently managing resources, for shared resources where appropriate, and for containing potential harmful impacts.

*We are very supportive of policies 3.6.2 and 3.6.3 to support the development of housing that is suitable to our climate and the health and wellbeing needs of our residents, while we support all policies to improve diversity of housing, connectivity, accessibility and adaptability of use over time.*

## Recommendations

1. Achieving Objectives 2.1, 2.2 and 2.3 will require an adaptive, collaborative approach. We believe for 'Otago's communities [to] reduce their exposure to, and adapt to, foreseeable adverse effects of climate change' and to 'minimise their contribution to climate change processes' that partnering with community delivery agencies will be key. The number of partner organisations and quality of partnerships, as measured in public meetings and events, will provide additional 'key indicators'. We recommend partnering with community agencies who are actively working on Climate Change issues.
2. We recommend strengthening the provision to support for community-scale renewable electricity generation, with reference to the National Policy Statement on Renewable Electricity Generation 2011.

3. We recommend partnering with the Otago Chamber of Commerce and the Otago Energy Research Centre<sup>5</sup> to also contribute towards a 'Baseline Energy Assessment for Dunedin' to allow for measurement of a reduction in fossil fuel use, an increase in renewable electricity and energy generation and measurement of greater energy productivity or lowered energy consumption.
4. We recommend advocacy for the establishment of a fossil fuel reserve off the Otago Coast, where fossil fuel reserves are assumed to exist (even when lacking evidence) and are therefore protected as preserved, unburnable carbon assets.
5. We recommend supporting the Cosy Homes initiative, to provide for better homes, and more productive energy use by residents, to lower carbon emissions and ensure we have housing that suits our climate and the health and wellbeing needs of our residents.

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<sup>5</sup> The Otago Chamber of Commerce and the Otago Energy Research Centre are currently collaborating on a Baseline Energy Assessment for Dunedin, with work beginning in the 2014-15 summer.