



18 March 2021

Doug Leeder

Chair

Bay of Plenty Regional Council

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Whakatāne

Tēnā koe Doug,

### **Submission to the Long Term Plan 2021-31 from the Whakatāne District Council**

Thank you for the opportunity to submit to the Long Term Plan 2021-31 for the Bay of Plenty Regional Council (BOPRC). The Whakatāne District Council (WDC) wishes to make the submission points outlined on the following pages.

The two key points in our submission relate, firstly, to the provision of regionally significant infrastructure, in particular a wastewater solution for Matatā, and secondly, to our region's response to climate change. We briefly summarise these below, with further details provided in the main body of our submission.

The Matatā community currently does not have a reticulated wastewater scheme, which means that individual landowners are reliant on their existing on-site septic tank system arrangements. This arrangement is proving to be problematic because septic tank failure at Matatā is creating unacceptable public health risk and environmental contamination. BOPRC acknowledge this issue<sup>1</sup>, and WDC is co-designing a solution with iwi for Matatā. The likely cost of a standalone wastewater scheme is estimated to be approximately \$16.1m. While there is funding from the Ministry of Health for the scheme, the remaining cost is beyond WDC's ability to fund, particularly in light of our wider Three Waters funding challenge. WDC is looking to BOPRC to provide catalyst funding to unlock this important critical infrastructure system for this coastal community. WDC requests that BOPRC allocate \$7m to the Matatā Wastewater Project, commencing in the 2023/24 financial year, through

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<sup>1</sup> For example, Draft Plan Change 14 proposed a maintenance zone for Matatā until a wastewater reticulation is developed

to 2025/26. In making this request WDC acknowledges BOPRC's previous co-investment in critical infrastructure.

WDC recognises and acknowledges the increasing and serious risk climate change poses to the Whakatāne District and the wider Bay of Plenty Region. How we respond to climate change and plan for the future is one of the most significant issues facing our region today. Working in collaboration will be crucial in ensuring a unified approach to climate change is taken across all levels of government, sectors, and departments to the benefit of our communities. We recognise the close working relationship shared by our organisations and the role BOPRC will have to play in helping us reach our climate targets. To encourage ambitious climate action across the wider Bay of Plenty Region, WDC suggests BOPRC set a regional climate target. We look forward to an ever-greater focus on partnership and collaboration as we move forward into the next ten years.

The Whakatāne District Council **wishes to be heard** in support of this submission. We look forward to your confirmation of a time and date to present our submission to the Council.

For specific enquiries related to the submission please feel free to contact the Strategy Team at Whakatāne District Council on p. 07 306 0500.

Ngā manaakitanga,  
Judy Turner  
MAYOR

## Section 1: Topics of particular interest

### 1.1. Matatā Wastewater Project

#### Summary of submission:

- WDC requests that BOPRC commits to an investment towards the Matatā wastewater project of \$7m from year three of the Long Term Plan (or earlier if consents can be obtained earlier). This funding will be critical towards implementing a waste water solution for Matatā that will provide substantial outcomes for the community including health benefits, environmental wellbeing, and unlocking growth potential.

WDC operates water, wastewater and storm water schemes in a number of different communities within the Whakatāne District. Almost all of the resource consents authorising the operation of these schemes, either to take water or discharge wastewater or storm water, will expire between now and 1 October 2026. Through the current development of the Whakatāne District Council Long Term Plan, three waters has been made the highest priority with a total investment of \$339million signalled for the coming ten years. Planning for these upgrades of existing infrastructure will cause a significant financial strain on our communities and the partnerships that we share with BOPRC and central government will prove critical making much needed investment. Nonetheless, WDC also recognises the urgency of resolving the existing wastewater situation at Matatā, and has made doing so an organisational priority.

The existing wastewater treatment and disposal system in Matatā relies on individual concrete pre-cast septic tanks and on-site ground disposal systems. Septic tanks provide a very basic form of treatment and require regular maintenance every three to five years. Many septic tank systems at Matatā do not meet the performance criteria, functional requirements and objectives of Clause G13 of the New Zealand Building Code.

The Matatā area is not well suited to septic tank effluent fields due to the high groundwater table in parts and poor drainage of soils. This results in septic tanks often discharging into the groundwater table. Monitoring by BOPRC over many years has confirmed ongoing septic tank contamination of freshwater streams within the Matatā township and Te Awa o Te Atua (Matatā Lagoon).

The BOPRC On Site Effluent Treatment Plan (OSET Plan) is currently a draft plan. It is estimated that that the compliance costs of a maintenance zone for Matatā are in the order of \$22 million and will require 20% (60) of the properties within the township to be vacated. The compliance costs will fall on individual property owners. BOPRC staff have also advised that a maintenance zone is an interim solution until full reticulation can be delivered.

In 2014, a resource consent was granted for a \$13.2m reticulated Matatā wastewater system funded by the Ministry of Health \$6.72m (51%), BOPRC \$1.88m (14%) and WDC \$4.6m (35%). The Environment Court subsequently declined the resource consent following an appeal. Despite the Environment Court decision, the funding from the Ministry of Health remains in place for a future reticulated wastewater scheme in Matatā.

WDC has committed to co-designing solutions with iwi for strategic three waters projects, including wastewater treatment and discharges. We have formed a collaborative project group with representatives from the iwi authorities within who rohe Matatā is located and are working with them to investigate wastewater options. BOPRC and Toi Te Ora Public Health have also been invited to participate in this collaborative process.

WDC is developing a wastewater solution for Matatā that seeks to address the current public health and environmental risks, and provides for regional development. This critical piece of infrastructure can unlock the potential and aspirations of the local iwi and community, ensuring the future wellbeing of the Matatā community.

While we are in the early stages of this project and are yet to identify a preferred option, for the purposes of including funding requirements in our LTP 2021-31 we estimate a total project cost of \$16.1m. This is based on a standalone scheme discharging treated wastewater to land, somewhere within the vicinity of Matatā. Our LTP anticipates the project being completed during the 2025/2026 financial year. This includes an estimate of all necessary authorisations being obtained by 2023/24, followed by detailed design and construction.

Given recent changes to the planning framework, such as the National Policy Statement for Freshwater Management 2020, we anticipate higher costs for the upgrades of our existing wastewater treatment plants following the replacement of discharge permits by 2026. Through the development of our Long Term Plan 2021-31, the highest priority for WDC is to improve our water supply, wastewater and stormwater services. Rather than asking the community about this programme, we are signalling that the works are not optional. We have determined that the investment into these services is absolutely necessary - particularly when we consider the implications for health and safety. In total we are signalling the need to spend \$482m on three waters infrastructure over the coming 30 years.

This is placing additional pressure on WDC's ability to fund the Matatā Wastewater Project. Therefore, and given that BOPRC understands the extent of the current situation, we respectfully ask for a contribution for the project of \$7m, distributed evenly across 2023/24-2025/26 (or earlier if consents are obtained earlier). For the avoidance of doubt, this funding is not for the preparation of preliminary design or the obtaining of resource consents. It is, instead only for the later stages of the project following the granting of consents and settling of any appeals.

## 1.2. Awatarariki

### Summary of submission:

- WDC acknowledges the support it has received from BOPRC towards the delivery of the Awatarariki Debris Flow Risk Management Programme and looks forward to the ongoing support of BOPRC over the 2021/22 financial year to enable completion of the project.

WDC acknowledges the support it has received from BOPRC towards the delivery of the Awatarariki Debris Flow Risk Management Programme. This support has been evident through being one of the three funding agencies for the Voluntary Managed Retreat (VMR) Programme and defending the appeal to the Environment Court against Plan Change 17 (Natural Hazards) to the Regional Natural Resources Plan. WDC looks forward to the ongoing support of BOPRC over the 2021/22 financial year to enable completion of the project.

## 1.3. Infrastructure strategy /Spatial plan

### Summary of submission:

- BOPRC will play a critical collaborative role in the development of a Spatial Plan for the Eastern Bay, ensuring alignment across the Bay of Plenty
- WDC seeks BOPRC's support to maximise funding opportunities to address significant infrastructure requirements.

With significant growth experienced in the Eastern Bay of Plenty since 2013, and further growth projected going forward, substantial work is required to ensure appropriate planning to deliver sustainable development. A collaborative Eastern Bay Spatial Plan is a critical component to complement a number of growth related planning projects.

BOPRC will play a critical collaborative role in the development of a Spatial Plan for the Eastern Bay. Aligning various sub regional spatial plans to form a regional view of both planning and regionally significant infrastructure investment requirements will increase the robustness and effectiveness of all plans.

The sub-region will face significant funding challenges over the coming 10-20 years. Infrastructure investment will be required to manage future growth. This is over and above the substantial infrastructure challenges including increased standards, ageing infrastructure and climate change. This will necessitate looking for appropriate and sustainable ways to fund increased investment needed in regional infrastructure. WDC seeks BOPRC's support as we work together to help realise the potential of the Eastern Bay whilst enhancing the wellbeing of our communities.

#### 1.4. Te Ara Hou/Promenade project

##### Summary of submission:

- WDC supports the investigation of alternative engineering options in regards to flood protection mechanisms in lieu of simply raising existing stop banks. WDC highlights the need for BOPRC to consult with Tangata Whenua and wider community on the engineering options.
- WDC through the Te Ara Hou and Transformation programme looks forward to working collaboratively with the BOPRC's Project FutureProof to deliver on common objectives for the future of the Whakatāne town centre.

WDC recognises BOPRC's need to undertake important flood protection works in our rohe, and supports the BOPRC's approach including investigating possible alternatives to simply raising existing stop banks to keep pace with higher water levels associated with climate change. WDC understands that a stop-bank solution could require banks to be raised by 600-800mm along the Whakatāne-Tauranga scheme which would have a significant impact on homes and stakeholders. This highlights the need for BOPRC to ensure genuine engagement with Tangata Whenua and wider community on the engineering options.

The WDC is in the process of planning for the delivery of its PGF Funded projects, which include significant works in and around the Whakatāne stop banks as part of its Town Centre and Riverfront Revitalisation (Te Ara Hou) programme. There are many known interfaces between this suite of works and the works proposed by BOPRC's Project FutureProof, recognising the overlap in the geographical area contemplated and acknowledging that each of these two programmes will shape the town's physical landscape for the foreseeable future.

The key objectives for the Council's Town Centre and Riverfront Revitalisation (Te Ara Hou) projects are:

- Increase economic and tourism activities.
- Improve connections from the town centre to the river.
- Reflect and enhance our cultural sites and stories of significance.
- Enhance public space and amenity, and connections to our natural environment.
- Improve the movement of people, and enhance pedestrian experiences.

WDC through the Te Ara Hou and the wider Transformation programme looks forward to working collaboratively with the BOPRC's Project FutureProof to deliver on common objectives for the future of the Whakatāne, resulting in a town centre that is protected, vibrant and thoughtfully designed.

## 1.5. Impending arrival of the Water Services Act

### Summary of submission:

- The impending arrival of the Water Services Act will require Regional and District Councils to work hand in hand in relation to protecting and managing drinking water supply catchments.
- WDC requests that BOPRC commit appropriate resource to implement best practice source water catchment management activities. In turn, WDC commits to engaging in this space at an appropriate level.

The impending arrival of the Water Services Act will require Regional and District Councils to work hand in hand in relation to protecting and managing drinking water supply catchments.

The current form of the Water Services Bill is signalling an impending step change in water legislation. The Bill proposes new arrangements relating to sources of drinking water—that is, the freshwater bodies from which water is abstracted before treatment. These new arrangements are based on a preventive risk management approach, alongside open flows of information between local authorities, drinking water suppliers, and Taumata Arowai.

Key measures for this approach include:

- Drinking water suppliers must have a source water risk management plan, which identifies the risks to a source of drinking water and manages, controls, or eliminates those risks as part of a drinking water safety plan.
- Local authorities must contribute to source water risk management plans by sharing information about risks and undertaking actions to address them on behalf of a drinking water supplier.
- Drinking water suppliers must monitor source water quality, and regional councils must assess the effectiveness of regulatory and non-regulatory interventions relating to source water every 3 years.
- A new provision in the Resource Management Act 1991 to require consent authorities to have regard to risks, or potential risks, to source water when considering applications for resource consents.

The Bill is expected to be enacted in mid-2021.

WDC requests that BOPRC commit appropriate resource to implement best practice source water catchment management activities. In turn, WDC commits to engaging in this space at an appropriate level. Such an approach also enables BOPRC and WDC to give effect to 'Te Mana o te Wai'<sup>2</sup>, an important principle underpinning the Bill.

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<sup>2</sup> <https://www.mfe.govt.nz/sites/default/files/media/Te%20Mana%20o%20te%20Wai.pdf>

## 1.6. Waste management and minimisation

### Summary of submission:

- WDC welcomes the timely conversation around the roles and responsibilities around waste management at a local and regional level.
- WDC calls for BOPRC to take on more of a leadership role in coordinating regional waste management and minimisation discussions.
- WDC request that BOPRC re-introduce the free hazardous waste service for households, the so called 'Hazmobile'.

WDC welcomes the timely conversation around the roles and responsibilities around waste management at a local and regional level.

WDC recognises the close working relationship shared by our organisations and the role BOPRC will have to play in helping us reach our climate targets. Reducing waste-related waste emissions and ensuring the resilience of our waste infrastructure are the two long-term outcomes of Council's waste and circular economies action plan. WDC is currently reviewing its Waste Management and Minimisation Plan (WMMP) and putting in place waste-specific targets and actions for the upcoming six years. At the same time, there is a growing focus around waste at central government level, not the least through the Climate Change Commission's first draft advice to government released last month (February 2021).

Central government is currently reviewing the New Zealand Waste Strategy, the Waste Minimisation Act and the Litter Act. As a result of these reviews it is appreciated BOPRC's responsibilities in relation to these areas may change. However, this process will most likely take a number of years. Meanwhile, there is a need for BOPRC to clarify its role and responsibilities regarding Waste Management and Minimisation.

Currently, the BOPRC has an active waste strategy, the Waste and Resource Efficiency Strategy 2013-2023, which is not being implemented. This strategy outlines how BOPRC:

"... have generally chosen to develop regional strategies to work with territorial authorities, industry and community enterprise to achieve shared waste minimisation objectives for their regions. This is in recognition of their role in resource management, the benefits of having a regional perspective and the potential economies of scale that can be seen at a regional level."

BOPRC has the opportunity to play an active leadership role in regional waste management and minimisation discussions. Both BOPRC and WDC currently participates and are members of the 'Waikato and Bay of Plenty Liaison Group', which is made up of all Territorial Authorities, the DHB and the Bay of Plenty and Waikato Regional Councils. The group actively focuses on policy implementation and has made significant achievements in regional waste management and minimisation. The group is largely facilitated through the Waikato Regional Council, who provide both staff resource as well as logistics. It would be appropriate for the BOPRC to play a more active role in managing this group.

BOPRC has previously managed a regional 'Waste Resources Advisory Group' but the group has not been active or received any support from the BOPRC for a number of years. BOPRC would have a real opportunity to take on more of a support/coordinator role for this group. Additionally, WDC would like to welcome discussion around whether to invite local and regional businesses to join this group as well.

WDC request that BOPRC re-introduce the free hazardous waste service for households, the so called 'Hazmobile'. This will ensure hazardous materials are handled and disposed of appropriately and therefore reducing their environmental harm from inappropriate disposal. While central government is proposing product stewardship scheme for agrichemicals this does not address residential hazardous waste.

## Section 2: Consultation questions

### 2.1. Climate change statement - Consultation document page 10-11.

#### Summary of submission:

- WDC supports the BOPRC climate change statement.
- WDC asks for regular updates to the Bay of Plenty Community Carbon Footprint, including the Whakatāne District footprint.
- WDC welcomes the potential project of a co-ordinated approach to climate change risk assessment and adaptation plans across the Bay of Plenty Region.
- WDC envisages closer collaboration between BOPRC and the region's territorial authorities on climate change modelling, in particular agreement on the input parameters used in the modelling.

WDC is supportive of the climate change statement outlined on page 10-11 of your Consultation Document. It closely aligns with our own climate change targets as well as our vision of actively leading and supporting the Whakatane District to mitigate and adapt to the effects of climate change.

Across the Whakatāne District, our communities have voiced the urgency of taking real and early climate action. In 2020, through the development of our climate change strategy and action plans, we set ambitious climate change targets to see us take deliberate actions towards being a CarbonZero<sup>3</sup> organisation by 2030, as well as a CarbonZero<sup>1</sup> District by 2030. Aligning to and in some cases exceeding national emission reduction targets emphasises the importance of the issue at hand and our commitment towards not delaying action in the face of uncertainty.

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<sup>3</sup> Excluding biogenic methane and nitrous oxide

WDC asks that BOPRC undertake regular (at least every 5 years) updates to the Bay of Plenty Community Carbon Footprint<sup>4</sup> including ensuring the information is able to be broken down to a District footprint level. The BOPRC last produced a regional carbon footprint in 2015/16. Regular updates will help you monitor progress towards your Climate Change statement. This information will also be useful for the community to understand how the Region is tracking, and will allow us to measure progress made towards our ambitious target of being a CarbonZero District by 2030<sup>1</sup> helping us inform the development of emission reduction pathways for the district.

WDC welcomes the potential project of a co-ordinated approach to climate change risk assessment and adaptation plans across the Bay of Plenty Region. This project will minimise duplication of effort and resource and ensure consistency and standardisation in reporting amongst councils. It will also facilitate efficient upward reporting to the Ministry for the Environment and Audit NZ.

WDC also envisages closer collaboration between BOPRC and the region's territorial authorities on climate change modelling, in particular agreement on the input parameters used in the modelling. WDC wishes to see the range of input parameters used to support the adaptive pathways approach to adaptation interventions that is promoted by the Ministry for the Environment. This provides for robust discussion during community engagement when adaptation interventions are being considered.

## 2.2. Climate change projects - Consultation document page 16-17.

### Summary of submission:

- WDC strongly supports the proposed climate change adaptation projects. The proposed projects directly align with WDC's own climate targets and the wider adaptation discussion necessary for the region.
- WDC supports a co-ordinated approach to climate change risk assessment and adaptation plans for the region. However, the risks and appropriate adaptations actions will still need to be understood at our District level. Our own adaptation and risk assessment project is planned to continue in parallel with the progress of a regional approach.
- WDC suggest additional climate change projects relating to public and active transport, as well as land use.

In support of option 3: Fund all four projects.

WDC welcomes the important and timely conversation around climate change adaptation at a regional and local level.

Although climate change considerations have been incorporated into our engineering models for many years, the Whakatāne District Council's climate change project has been largely mitigation-focused. Building on the Awatarariki Voluntary Managed Retreat Programme, we are turning our

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<sup>4</sup> [https://www.boprc.govt.nz/media/718089/bay-of-plenty-community-carbon-footprint-2015\\_16\\_final-results.pdf](https://www.boprc.govt.nz/media/718089/bay-of-plenty-community-carbon-footprint-2015_16_final-results.pdf)

attention towards other matters in the adaptation space. One of the first initiatives has been to develop a local climate change risk assessment and adaptation project proposal specific to the Whakatāne District. The project is intended to deliver on the adaptation targets set through WDC’s climate change strategy as well as the adaptation-related actions identified in WDC’s climate change action plans. The project will dovetail with the collaborative approach to develop a regional climate change risk assessment framework with BOPRC and other territorial authorities within the region.

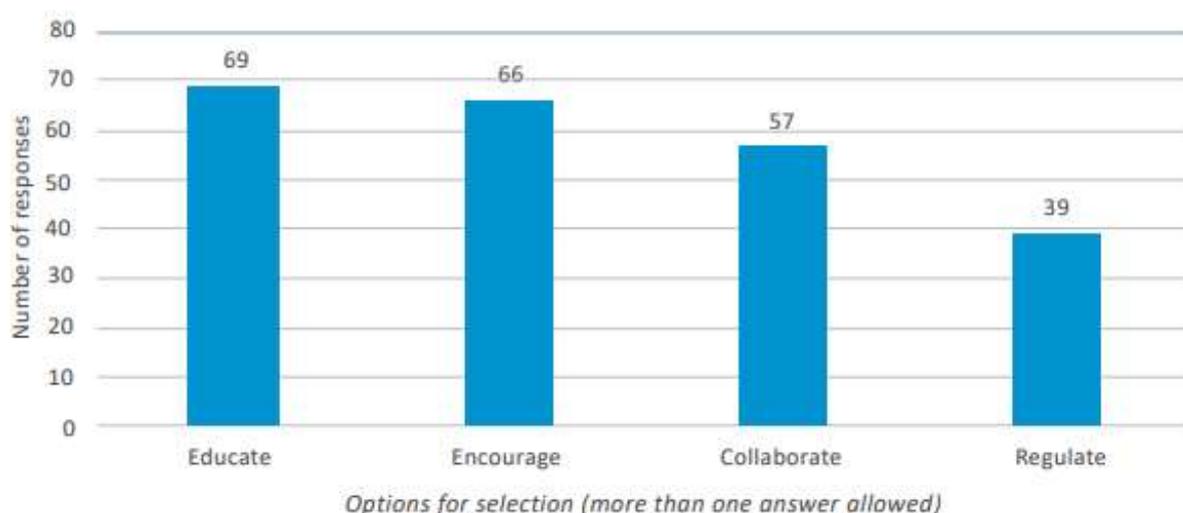
WDC supports the regionally- co-ordinated approach to climate change risk assessment and adaptation plans for the region. However, the risks and appropriate adaptations actions will still need to be understood at District level. WDC’s adaptation and risk assessment project is planned to continue in parallel with the progression of a regional approach.

WDC supports BOPRC’s potential project for increased facilitation and support of community conversations around adaptation. Action towards WDC’s climate adaptation targets will be informed by identifying the communities most at risk from climate-related natural hazards by 2022 and developing community-led adaptation plans by 2025. Enabling early community discussion around adaptation will be crucial to this work and BOPRC will be an important stakeholder in facilitating those conversations.

WDC supports an increased focus on climate engagement and education. Education is a key component of delivering on our climate change aspirations and we need to continue to learn more about climate change as an organisation, as well as share, encourage and enable our communities to do the same. When consulting on our draft climate change strategy and action plans, ‘education’ was regarded by the Whakatāne community as WDC’s most important role when it comes to increasing community resilience to climate change (please see figure 1 below).

Figure 1: Education is seen as the primary role of Whakatāne District Council when it comes to increasing the resilience to climate change (adaptation)

**Whakatāne District Council’s role in increasing the community resilience to climate change (adaptation) should be...**



## 2.2.1 Relating to Consultation question - What specific climate change project should the Regional Council fund?

WDC recognises the close working relationship shared by our organisations and the role BOPRC will have to play in helping us reach our climate targets. How we respond to climate change and plan for the future is one of the most significant issues facing our region today. Working in collaboration will be crucial to ensure a unified approach to climate change is taken across local government for the benefit of our communities.

In addition to strongly supporting the climate change projects outlined in BOPRC's Consultation Document, WDC suggests additional climate change projects be considered. When it comes to responding to climate change and reducing the local impact, a range of ideas and projects need to be explored.

WDC welcomes further discussion around additional climate change projects BOPRC could fund. WDC acknowledges BOPRC undoubtedly already has a range of options identified and welcomes further discussion and collaboration on the topic.

Some exploratory ideas WDC would like to bring forward include:

- Discussion around the creation of new transport routes and consideration of alternative public transport solutions to service more areas in the Eastern Bay of Plenty, as well as running existing services more frequently.
- Closer collaboration between BOPRC, the regions territorial authorities, Waka Kotahi and other potential funding and governance partners in establishing a cycle network across the Eastern Bay of Plenty.
- Discussion around a variety of land use options. For example, BOPRC owns land that could be planted with trees to create carbon sinks, which would also have the added benefit of increased biodiversity and cleaner waterways.

These are some exploratory ideas on further climate mitigation and adaptation initiatives between the BOPRC and WDC, with many more anticipated to emerge as we progress together on this journey. WDC looks forward to ever-greater focus on partnership and collaboration as we move forward into the next ten years.

## 2.3. Sustainability funding - Consultation document page 18-19.

### Summary of submission:

- WDC strongly supports sustainability funding as an opportunity to enable our communities to take climate action, as well as enabling a range of other health and wellbeing benefits for our communities.
- WDC raises the concern about how low income households will be supported in the uptake of the proposed sustainability and energy efficiency initiatives, given that many low-income households rent and do not own the property they live in. The equity aspect must be front and centre when discussing possible solutions. It is requested that BOPRC work with landlords to encourage up-take of any scheme.
- WDC welcomes investigation into whether the scheme can be extended to include subsidies for domestic EV charging stations within homes, secure e-bike storage within urban areas etc.

In support of option 4: A combination of low interest loans + no interest loans + partial grants (for low income households).

Reducing energy-related carbon emissions as well as building the energy supply resilience of the Whakatāne District are the two long-term outcomes of WDC's [Energy Action Plan](#). These outcomes will be our biggest stepping stones towards reaching our ambitious target of being a Carbon Zero District by 2030<sup>5</sup>. Stationary energy<sup>6</sup> accounts for 17% of the Whakatāne District's carbon footprint emissions<sup>7</sup>. This is above the national average per capita.

WDC will only make progress towards these targets by working collaborate across central and local government, industry, business as well as our stakeholders and iwi-partners. The BOPRC will have a crucial part to play in supporting households in the Whakatāne District to reduce their greenhouse gas emissions. Subsidising sustainability initiatives is a great way for BOPRC to show leadership and enable community climate action, while not resulting in significant increased cost to ratepayers.

Also worth noting is:

1. The Whakatāne District has a high deprivation rate, averaging around eight on the decile deprivation level scale across the District. The high levels of deprivation is one of the reasons for our strong emphasis on affordability and the need for accessible subsidies for businesses, organisations and individuals to progress climate change initiatives like energy efficiency (insulation, green building standards, renewable energy etc).

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<sup>5</sup> Excluding biogenic methane and nitrous oxide

<sup>6</sup> Stationary energy includes energy sources like electricity, natural gas, LPG, coal and biofuel use. It excludes energy generated from fuel (diesel and petrol).

<sup>7</sup> [https://www.boprc.govt.nz/media/718089/bay-of-plenty-community-carbon-footprint-2015\\_16\\_-final-results.pdf](https://www.boprc.govt.nz/media/718089/bay-of-plenty-community-carbon-footprint-2015_16_-final-results.pdf)

2. The District is experiencing rapid growth and development, with significant further investments due in the region through the Provincial Growth Fund. This will bring rapid residential development to the District and the opportunity for households to install high energy efficiency solutions from initial construction.

Energy efficiency and sustainability initiatives often bring a range of other health and wellbeing benefits for communities as well. Insulating homes and providing cleaner heating technology will lead to overall healthier homes and increased wellbeing of our communities. Providing subsidies for households to generate their own energy will increase the overall resilience of our communities when faced with climate hazards, like more frequent and severe storms that may disrupt connectivity to the national grid.

In many instances, similar sustainability schemes already exist through eg. the [EECA – warmer kiwi homes scheme](#) and the [Trust Horizon Retrofit Insulation Programme](#). Has BOPRC considered working in collaboration with agencies like the above in exploring and providing the proposed sustainability initiatives? In many cases these initiatives are only available to homeowners, and do not include rental properties.

WDC raises concern about how low income households will be supported in the uptake of the proposed sustainability and energy efficiency initiatives, given that many low-income households rent and do not own the property they live in. In the Whakatāne District, homeownership is around 53 percent<sup>8</sup>. Will landlords be encouraged to take up these initiatives and will that lead to rent increases for already struggling households? The equity aspect must be front and centre when discussing possible solutions. A 'just transition' towards a low-emissions future needs to be a key principle of any climate change initiative.

WDC welcomes investigation into whether the scheme can be extended to include subsidies for domestic EV charging stations within homes, secure e-bike storage within urban areas etc. These initiatives strongly link to our emission reduction targets for the Whakatāne District, enabling the mode and behavioural shift necessary for our communities to take climate action.

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<sup>8</sup> <https://www.stats.govt.nz/tools/2018-census-place-summaries/whakatane-district#housing>

## 2.4. Public transport fares - Consultation document page 20-21.

### Summary of submission:

- WDC supports region-wide free bus fares for children, tertiary students and community services card holders, especially where lower socio-economic communities struggle to access core services because transport costs are a factor.
- WDC is cautious of the proposed region-wide flat fares for buses.
- WDC welcomes higher-level discussions around further initiatives to encourage the necessary mode shift towards a low emission economy across the Bay of Plenty Region. This includes additional climate change projects the Regional Council may want to consider funding (relating to consultation question 1).

As a predominantly provincial district, many of our communities are geographically dispersed and increasingly rely on private car ownership to get around. Transport emissions are hence a significant contributor of the Whakatāne District's carbon footprint and reflects the long travel distances between urban centres. Through WDC's extensive community engagement in the development of our Active Whakatāne Strategy, the importance of regular, reliable and extensive public transport to reduce private car use was emphasised. Associated traffic and safety benefits of reduced vehicles, realised through increased public transport use, will also act as a catalyst for increased active transport and associates health and community connection.

WDC supports region-wide free bus fares for children, tertiary students and community services card holders. Affordability of public transport is especially an issue in lower socio-economic communities that may be struggling to access core services because of transport costs. The accessibility of public transport services still remains an issue with many of our communities currently not being connected to a public transport service and hence cannot benefit from these initiatives.

WDC welcomes further investigation into whether the cost of enabling region-wide free bus fares for children at all times will create increased patronage of public transport. If this is the case, WDC would support Option 3: Free fares for school children at all times.

WDC is cautious of the proposed region-wide flat fares for buses. If enabling flat fares across the region will result in an overall increase in trip cost, it won't improve overall public transport patronage. Encouraging residents to utilise public transport, for both short and long trips, is especially important for encouraging the public transport uptake necessary for reducing overall transport-related carbon emissions within the Whakatane District.

Reducing transport-related carbon emissions is one of the outcomes specified in WDC's [Transport Action Plan](#). Promoting travel efficiency as well as enabling and encouraging active and public transport will be crucial in the transition towards a low carbon economy across Aotearoa New Zealand. These initiatives also strongly aligns with He Pou a Rangi (the New Zealand Climate Change Commission's) first draft advice to government, heavily focusing on curbing transport related emissions.

WDC welcomes higher-level discussion around additional initiatives to encourage the necessary mode-shift towards a low emission future across the Bay of Plenty Region. For some of our communities, it is not the cost but the accessibility and frequency of a public transport service that hinders a higher use rate. Bus routes do not reach all our small rural communities across the Eastern Bay of Plenty or do not run frequently enough to service school/work/public service hours like hospital appointments etc. Youth living rurally across our district have voiced their concern in the lack of alternative transport options for them to feel connected to the main neighbouring urban centres. In 2019, BOPRC introduced five electric buses to of its fleet – the first in New Zealand outside of a main metropolitan centre<sup>9</sup>. WDC supports BOPRC's efforts to electrify its public transport fleet and wonders whether further electrification has been considered? What benefits have been experienced, against using a similar financial investment to provide additional public transport options? WDC is currently working towards further electrifying its fleet and keen to share learnings between councils.

WDC welcomes further work looking into the most effective options of moving the Bay of Plenty Region towards a low carbon economy – be it through increasing the frequency and accessibility of public transport services, electrifying its fleet etc.

To address these concerns, WDC welcomes discussion around additional climate change projects under consultation topic 2.1. Climate change projects.

**2.4.1. Region-wide free bus fares for school children** - Consultation document page 22.

In support of option 2: Free fares for school children during arrival/departure times (e.g. 7-9am and 3-6pm)

**2.4.2. Region-wide free bus fares for tertiary students** - Consultation document 23.

In support of option 2: Free fares for tertiary students at all times (on showing identification).

**2.4.3. Region-wide free for Community Services Card holders** - Consultation document page 24.

In support of option 2: Free fares for CSC card holders

**2.4.4. Region-wide flat fares for buses** - Consultation document page 25.

In support of option 1: No flat fares.

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<sup>9</sup> <https://www.boprc.govt.nz/your-council/news/news-and-media-releases/media-releases-2019/october-2019/electric-buses-hit-streets-of-tauranga>

**Summary of submission:**

- WDC supports the introduction of a targeted rate to provide funding for charitable regional safety and rescue services (RSRS).
- WDC asks for assurance that the same level of service will be retained for the Eastern Bay of Plenty.

WDC is in support of option 4: A funding increase of up to \$600,000 per annum.

WDC supports an introduction of a targeted rate to provide funding for charitable regional safety and rescue services (RSRS). These charities provide a number of vital safety and rescue services to both our local communities as well as our visitors to our region. WDC support the RSRS provider's desire to better plan for the future and focus their resources on core services, as opposed to continually applying for funding.

WDC currently funds local safety and rescue services through the annual Harbour fund grant process. These rescue services include charities like Coastguard, Surf Lifesaving NZ and the local surf lifesaving club. In some cases these charities also have the opportunity to apply for funding through the WDC's LTP cycle for three years at the time. Approximately \$60-\$75K is provided annually to RSRS providers.

WDC supports BOPRC introducing a targeted rate to provide funding for RSRS and welcomes discussion around whether the funding WDC currently provide to these same charities will be necessary in the future. In our submission to the BOPRC annual plan 2019/20, WDC supported the idea of centralising regional safety and rescue funding. We continue to support this approach.

WDC asks for assurance that funding these RSRS providers will continue to benefit our district's ratepayers and maintain the same level of service for the Eastern Bay of Plenty. For example, historically WDC has provided a grant that has enabled the cost of life guards to be paid for Thornton and two locations in Ōhope – generally from Boxing Day to the end of January. If the WDC individual contribution to these charities is replaced by BOPRC funding, will BOPRC ensure that the same level of service continues to benefit our local communities?

## 2.6. Financial strategy - Consultation document page 28-33.

### Summary of submission:

- WDC supports the principle within BOPRC's Financial Strategy to ensure rates will be kept affordable while having financial resilience to respond to climate change and other challenges.
- WDC requests that the BOPRC review the financial strategy rating approach. The current property modelling illustrates that the rating burden falls heaviest on the most deprived communities in the region, particularly noting the Whakatāne and Ōpōtiki Districts.
- WDC acknowledges the benefits that Quayside holdings dividends provide towards the region. WDC supports intentions to sustainably manage and grow this resource for ongoing benefit, enhancements to transparency, and strategic application for maximise community benefit.

WDC supports the BOPRC financial strategy in ensuring rates will be kept affordable while having the financial resilience to respond to climate change and other challenges.

The rates increases proposed by BOPRC for the Whakatāne District in the LTP 2021-31 follow substantial increases in previous LTPs. The result is that Whakatāne District (and Opotiki District) will face much higher rates than other areas of the region. The distribution of rates requirements, as indicated on the median rates graphs on p.33 of the consultation document demonstrate this disproportionality. WDC requests that the BOPRC review the financial strategy rating approach (page 33). The current property modelling illustrates that the rating burden falls heaviest on the most deprived communities in the region, particularly noting the Whakatāne and Ōpōtiki Districts. These districts pay elevated rates due to the Urban River Scheme but are also the communities most at risk from climate related events like flooding, more frequent and intense storms, sea level rise etc. As climate related natural events become more frequent and intense due to climate change, the equity of climate change needs to be in the forefront of financial decision-making going forward.

WDC recognise the significant opportunity and benefit presented by the availability of Quayside Holdings dividends. Increasing the transparency of the commercial returns of Quayside (distributed or re-invested) is essential to inform community and stakeholder discussion and decision-making. To this end WDC acknowledges the work BOPRC has done over the last year preparing a transparency strategy. WDC also supports intentions to manage the resource sustainably and to continue to grow the resource for ongoing and future benefit.

The intention to use dividends to offset general rates would appear to apply the greatest benefit towards areas that have the highest land value. It is considered that dividends could and should be applied more strategically towards the achievement of critical objectives and with more deliberate consideration towards the principle of affordability. This notes that our region and communities face significant future challenges in housing affordability, that wealth equity in our region is disproportionate, that climate change adaptation poses a significant challenge, and that enhancing environmental outcomes requires significant investment in the near future (to name a few).