

Submission on the Long-Term Plan (LTP) 2024-2034

To Auckland Council,

I am writing this submission to express my views and concerns regarding the Long-Term Plan (LTP) 2024-2034, with particular attention to the environmental management and conservation aspects of the plan. While I appreciate the Council's efforts in various environmental initiatives, I believe there are critical areas where the plan could be enhanced to better protect Auckland's natural environment, marine biodiversity, and cultural heritage.

Concerns and Recommendations:

- 1. Development Contributions Policy:** The LTP discusses the council's approach to recover infrastructure costs associated with growth through development contributions. However, it lacks clarity on whether these contributions are adequately calibrated to ensure developers bear a fair share of the environmental impacts of development, such as sedimentation and other forms of pollution.
- 2. Environmental Management and Regulation:** The plan emphasises the council's intent to use regulatory powers to achieve good neighbourhood and climate outcomes. However, the specifics on how regulations will be strengthened to hold polluters accountable, especially in the context of sediment impacts from development, are not detailed.
- 3. Asset Management and Infrastructure:** The plan includes significant investment in infrastructure renewal and resilience, especially concerning water and stormwater management. However, the emphasis appears more on mitigating current risks rather than a comprehensive long-term strategy to reduce environmental impacts and enhance ecological resilience.
- 4. Community Engagement and Stewardship:** The LTP acknowledges the role of community engagement in environmental conservation but may not sufficiently outline how this engagement will be scaled up or supported to address pressing issues like overfishing, sedimentation, and biodiversity loss more effectively.
- 5. Inadequate Addressing of Overfishing and Marine Protection:** The LTP lacks specific strategies to address overfishing and marine ecosystem protection. I urge the Council to consider the precedent set by the Motiti decision, which empowers local councils to create Resource Management Act (RMA) protection areas to safeguard marine biodiversity. Such measures are not only crucial for environmental reasons but also hold cultural and amenity value.
- 6. Economic Benefits of Marine Conservation:** The economic rationale for marine protection areas is compelling. The marine reserve at Leigh, despite its small size, generated over \$18.6 million a year for the local economy in 2008, against a modest conservation expenditure of around \$70,000 by the Department of Conservation

(DoC). This highlights the incredible Return On Investment (ROI) that well-managed marine conservation areas can offer. The LTP should, therefore, integrate marine protection areas as a strategic economic and environmental initiative.

7. **Pollution:** The scope of pollution control in the LTP should be broadened to confront not only sediment runoff from urban development and industrial sources but also pervasive plastic waste and less visible but equally damaging pollutants such as endocrine disruptors. These pollutants have a profound impact on both marine life and human health, necessitating a multifaceted strategy that includes robust waste management policies, public education, and stringent regulation of such pollutants to safeguard Auckland's precious freshwater and marine ecosystems.
8. **Freshwater Ecosystems:** While there is mention of water management and I fully support the Making Space for Water programme, more attention could be placed on the protection and restoration of freshwater ecosystems, which are vital for maintaining biodiversity and providing clean water.
9. **Air Quality:** The LTP does not explicitly address air quality issues. Measures to monitor and improve air quality, particularly in relation to traffic emissions and industrial activities, could be included.
10. **Although waste management is addressed:** The LTP could benefit from a more aggressive strategy towards zero waste, emphasising reduction, reuse, and recycling, and promoting circular economy principles.
11. **Ecosystem Services:** The plan could recognise the importance of ecosystem services more strongly and develop strategies to protect and enhance these services, which are critical for flood mitigation, carbon sequestration, and maintaining local climate regulation.
12. **Sustainable Agriculture and Urban Farming:** There is no mention of sustainable agriculture or urban farming initiatives, which can contribute to food security, community resilience, and local economic development.
13. **Natural Environment Targeted Rate (NETR):** The LTP proposes reinstating and increasing the NETR to fund environmental initiatives. However, the document suggests potential trade-offs and scaling back of other programs to accommodate new initiatives, which may indicate a need for more robust funding mechanisms to support comprehensive environmental protection and management efforts without compromising existing projects. I'm concerned about 'carbon tunnel vision' and want the Council to focus on its responsibilities to protect indigenous biodiversity which has everyday threats now.
14. **Protection of Threatened Species:** Auckland's region is home to numerous threatened species, both marine and terrestrial. The Council has an obligation to protect these species under national and international conservation mandates. The LTP should outline specific measures, including the establishment of protected areas

and stricter pollution and fishing controls, to ensure the survival and thriving of these species.

15. **Funding for Caulerpa Seaweed Problem:** The allocation of \$200,000 to combat the spread of Caulerpa seaweed in the Hauraki Gulf will be insufficient considering the potential ecological impact of this invasive species. This indicates a need for more substantial investment to effectively manage and mitigate this environmental threat.
16. **Urban Development and Green Spaces:** The LTP discusses infrastructure investment and growth, but there seems to be a lack of emphasis on integrating green spaces within urban development, which is essential for biodiversity, community well-being, and urban cooling.
17. **Strategic Vision and Prioritisation:** The document outlines various environmental initiatives but may lack a cohesive strategic vision that prioritises the most critical environmental challenges. This includes addressing the cumulative impacts of growth, climate change, and other pressures on Auckland's natural environment in a more integrated and comprehensive manner.

Auckland Council has a unique opportunity through the LTP to set a benchmark in environmental and marine conservation. By incorporating specific measures inspired by the Motiti decision, focusing on the economic and ecological benefits of marine reserves, and addressing pollution alongside overfishing, the LTP can achieve a sustainable balance that benefits Auckland's environment, economy, and communities.

I hope these concerns and recommendations are taken into consideration in the finalisation of the Long-Term Plan 2024-2034.

Sincerely,

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