

From: [ECInfo](#)
To: [Mailroom Mailbox](#)
Subject: FW: Submission on ECAN LTP from Forest and Bird, North Canterbury Branch EMAIL:05270809
Date: Monday, 13 April 2015 9:18:57 a.m.
Attachments: [{cid8cc5e8c3-1132-6e94-6e71-c727b0467b77@yahoo.com}ECan LTP March 2015 Forest and Bird North Canterbury branch submission.pdf](#)
Importance: Low

----- Original Message -----

From: Hurford Rachel
Received: 12/04/2015 10:11 p.m.
To: ECInfo; Environment Canterbury; Services Customer; Services Customer
Subject: Submission on ECAN LTP from Forest and Bird, North Canterbury Branch

Hi there,
Please see attached submission.

Regards,
Rachel Hurford
Chairperson
Forest and Bird, North Canterbury Branch

Submission on Environment Canterbury Long Term Plan

From: Forest and Bird, North Canterbury Branch

By: Rachel Hurford

Chairperson

We do wish to speak to this submission.

Introduction

We wish to address a range of items in the Environment Canterbury LTP but would like to emphasise, in particular, our concern at the signalled reduction to the biodiversity funding. There is a critical need in Canterbury to protect what remaining and remnant indigenous biodiversity we have. Indigenous biodiversity has been lost at an alarming rate in recent times in large part due to changed land use, and agricultural intensification including the irrigation of dry land ecosystems.

We are also very worried about the incursion of a range of weed species, e.g. barberry and bone seed, throughout Canterbury. Some changes to funding including the biodiversity funding signalled in this LTP will affect ongoing work on this problem.

We would like to support the intent expressed in your introduction to the consultation document of making the taking of practical action to clean up Canterbury's rivers, streams and lakes one of ECan's top priorities.

One of the practical approaches, we believe, is to address the problem of motorised vehicles accessing braided river beds and other sensitive ecological zones. When our members have been involved with activities like river bird surveys they have been reporting "river beds like roads"; 4WD vehicle owners who when told of endangered bird breeding sites ahead respond with such comments as "It's just a few...[expletive].. birds."

It is sadly 'just a few' now for so many of our endemic species and we need to address that urgently. We believe that motorised vehicles should not be allowed such open and extensive access and the Environment Canterbury should be proactively working to reduce this critical problem for our braided river ecosystems.

Summary of proposed changes to activities (p5)

- *Support item 1* relating to better water management.
- *Support item 2* relating to public transport and encouraging its use
- *Support item 4* to provide better data and easier access to that data. (Extremely important in relation to the CWMS.)
- It would have been useful in this section to be informed with more clarity re reductions in funding – where will they impact? how large will they be?

Better water management

- The consultation document states that better water management is to be funded by a targeted rate. However there is no detail on how this rate is split between urban/rural in the document. We believe this should be clarified.

- We support the principal of the ‘polluter pays’ regarding water quality.
- There is no detail on the ZIPs and plans and whether or not the limits and levels of nutrient pollution are based on scientific analysis. This does not help us determine whether the LTP will meet freshwater challenges over the next ten years.
- *Support the approach* outlined in the *summary of aims*. There needs to be action against non-complying farmers. The action should be detailed and publicised. Secondly there seems to be a lot of ‘encouraging’ of farmers to comply. We believe it should be mandatory for farmers to have a farm environment plan by a set date. There is no time-line and deadline mentioned in this section. This is inadequate.
- There is no mention of specific freshwater targets, limits and levels of nitrates and phosphates and other pollutants in this section. Neither is there any indication of progress thus far in reaching ECan targets. This serious lack of data is a major problem. We would like more transparency, and for data to show rate payers progress in improvements to water quantity and quality.

Natural habitats

- *Support* the points raised in the summary of aims.
- *Support* the continuing funding of biodiversity projects as described.
- *Support* using funds to focus on natural corridors, but not at the total exclusion of other projects.
- *Oppose* reduction in funding for biodiversity projects. We understand there is to be a 50% reduction in funding across a number of biodiversity projects. This is excessive and can surely be mitigated (see our introduction).
- *Support* projects to protect and enhance the ecosystem of Canterbury’s braided rivers. However, the restoration work you point out as being done at numerous sites by ECan and the work of many other community organisations like ours is being seriously undermined by the motorised vehicle access to braided river beds not being regulated seriously and consistently enough.

Transport

- *Support* the general aims in the summary section and the need to increase bus usage.
- *Support* ECan investigating and supporting the development of light -rail links.
- ECan should also *support* any moves by local authorities to encourage the development of cycling and active transport in urban areas. Cycling is a sustainable form of transport, while also being of significant benefit to people’s health and well- being.

Keeping us safe

- *Support* the aims outlined in the summary at the beginning of this section.
- We are concerned at the new Regional Pest Management Plan. While the strategy as outlined here seems sensible on the face of it, we *oppose* current resources going into existing pest management being significantly reduced.

- We are also concerned that the impact of climate change/disruption is not more in the forefront of planning and thinking amongst both politicians and the public in general. ECan could and should be showing more leadership in this area.

Setting the rules

- *Support* most of the aims presented in the summary, particularly taking action on infringements and compliance. There is a perception that ECan is weak in this area, and does not prosecute offenders enough. There is a need for restrictions in relation to motorised vehicles on river beds. While we acknowledge ECan do not manage all river beds we believe it could collaborate with LINZ and DOC in particular to regulate against the vandalism that occurs and is becoming a worsening problem as more people choose and can access these vehicles for recreational pursuits.
- In some areas education is vital and works. Urban water users given sensible accessible information about the effect of their activities on storm water entering river systems might well change habits. In some areas regulation must be used as education has either failed or produces a 'counter' effect.

Regional leadership

- *Support* most of the aims presented in the summary.
- *Strongly support* a significant improvement in provision of relevant scientific/hard data, particularly in relation to progress on freshwater management. At present there appears to be a lack of clear public understanding of progress in this area. We need good data, accessible to people.

R.Hurford,,Chairperson, Forest and Bird North Canterbury Branch
12/4/2015