

From: [ECInfo](#)
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From: Taylor Rhys Edwards
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To: ECInfo; Environment Canterbury; Services Customer; Services Customer
Subject: Long term plan submission - please receipt.

Submission on ECan Long-term Plan 2015-2015

Made 12-4-2015 from Anne Griffiths and Rhys Taylor
Our personal views as residents & ratepayers in Geraldine

We look forward to early and full restoration of democratic representation of ratepayers in this region, so that taxation is accompanied by representation.

Water management

We support increased work to improve water quality in the region's streams and rivers so that all become swimmable and safe for contact recreation and fishing/food gathering. Towards this, enforcing limits on discharges of nitrate, phosphorus, siltation and of bacteria from farming activity are all necessary and should be tackled through farmer education, grant incentives, community volunteer involvement (e.g. for catchment groups and riparian enhancement), faster response to pollution hotline reports and when necessary prosecutions. Central Government's 2014 National Policy Statement standards for water quality are inadequate and thus ECan should aspire in this plan to reach higher standards. We support the proposed increased spending in this area. See also comments on safety - below.

Natural habitats

We have been ECan grant recipients on our land for native bush restoration during the past decade and do value this part of the Council's work, in partnership with willing land owners, Local Councils and DOC. We do not support moving all habitat funding into water zone implementation as the region's natural habitats are diverse. Considering connectivity when prioritising makes sense for bird life and mobile species (and did for our own 3Ha bush area, within reach of DOC reserve land and QEII Covenants on an adjacent farm), but some plant and animal life is not so mobile and simply needs the existing right spot to be conserved, not a substitute habitat a few kilometres away being enhanced to supposedly 'trade' for the original one. Protection of surviving habitat remnants in this much impoverished farmed landscape is more important than is credited in the draft Plan.

Transport

We are concerned that central Government policy is too roads dominated and is too responsive to road freight company demands at the cost of alternative freight modes, especially rail, and is having a damaging and expensive impact on road surfaces and bridges, beyond the capacity of district and regional council maintenance spending. This policy stance does not prepare the regions for impacts of global 'peak cheap oil' within this plan period, nor for the limitation on carbon fuel burning that must result from any coordinated response to global warming.

Business will not be 'as usual' in transport or freight within a few years and we are sadly unprepared. We therefore support feasibility study and part-funding of rail passenger transport into Christchurch from Kaiapoi and Rangiora at north and Ashburton and Rolleston at south; additional levies on heavy freight to help pay for road and bridge maintenance (such as regional diesel fuel taxes), trial installation of electric vehicle recharging points on main highways, continued support for community-managed transport services such as Geraldine Community Minibus Trust, and encouragement of urban walking and cycling.

Greater Christchurch

We favour urban intensification over rural sprawl, particularly because of the transport issues mentioned above. It is also important to protect land of high horticultural production value within easy reach of the city, especially that more than 20m above sea level, as strategic assets in an age of global warming. Too much good farmland is being lost to car-dependent low rise housing. The ECan-led urban growth strategy was heading in the right direction until CERA interfered at central Government's bidding. Have the confidence to continue arguing this case: an elected council may well have done so, whilst Government appointees may not?

Cleaner air

We support extension of clean air education, grants and initiatives to south Canterbury Towns. Winter air quality in Geraldine and Timaru is poor. Insufficient home insulation, lack of thermal mass (for day-night temperature stability), behavioural choices and poor quality heating systems all contribute to this problem. Educational input could usefully include Sustainable Living Education Trust – already supported by several district councils.

Crop stubble burning is a significant autumn air polluter and depletes soil carbon storage – it should be phased out within the lifetime of this plan, as there are alternative techniques available, used in other countries. Farm air pollution is used by some townspeople to justify their own smoke pollution, and they should not have this easy excuse. We do support retaining an option of wood burning however – although we live just outside the 'Geraldine Airshed', we have in recent years installed a clean air approved burner and only use dry wood, in order to minimise our own smoke.

If oil and gas prospecting results in gas finds within Canterbury, ECan must be ready with policies and regulations to cope with potential air and water pollution from production, which might include flaring and fracking. Experience in Taranaki shows that being unprepared leads to companies obtaining pollution rights for as long as 35 years and to some very unhappy neighbouring residents! The draft air plan and the Long Term Plan do not yet consider this type of potential rural industrial activity, which might prove a costly omission.

Safety –Natural and other hazards

We support ECan activity in this area and hope that the new HQ in Tuam Street will be better built as a civil defence HQ in the event of major Alpine or local quakes than the previous offices in Kilmore Street. Perhaps a back-up regional CD facility needs to be planned, in a different location, to spread the risk?

We would like to see more urgency in the Long Term Plan response to rising sea levels, given research evidence from Antarctica (which predicts enough ice melt to create major sea level rise within this century). Consequences for river flooding in lower reaches, coastal erosion and the loss of insurance cover for existing homes and businesses on the coast have been under-

estimated, no doubt for political reasons of 'not alarming people'. Insurance companies globally are having serious discussion on this – councils have to face up to it too.

Groundwater pollution and damage to drinking water sources is a significant issue also being under-played politically. Reducing nitrate input to ground water is urgent – even the West Melton area of Christchurch is now affected, following problems at Dunsandel and Ashburton. How much of the region could be adversely affected within a decade? This is the real public cost of private farm irrigation and dairy stock number intensification and makes it un-sustainable practice. Within this Plan period, ECan may have to advise farmers on how to reduce stock levels and use radically different fertiliser application regimes in order to protect groundwater, so it will need a really good team of hydrologists and other scientists, and the courage to speak out about statistically probable causes and effects before full proof is available, because incontrovertible proof may be too late to protect water quality and these nitrates are very difficult to extract from formerly clean drinking water. This non-point source pollution is cumulatively more important than point source intermittent pollution of waterways from human or farm effluents, although public attention has until now focussed more on those point-sources because they are more easily seen and measured.

In summary we seek a more democratically-accountable Environment Canterbury, acting as the strong environmental guardian required by statute, as an educator and enabler of change – from youth through into lifelong learning – and as a legitimate protector of the public interest considering development proposals by private interests that affect land air and water. We're happy to pay rates for that service, to volunteer help in our community and to champion such causes as citizens.

We are happy for these views to be public and to be summarised by Ecan officers but may not be available to speak at Plan hearings because of work commitments.

Please receipt on Monday and let us know if you require a signed copy to follow by mail.

Anne Griffiths & Rhys Taylor