

From: [ECInfo](#)
To: [Mailroom Mailbox](#)
Subject: FW: Submission on ECan LTP EMAIL:05270807
Date: Monday, 13 April 2015 9:18:13 a.m.
Attachments: [{cid7285CFF54D87EC47861093DC7B8A986A@ecan.govt.nz}ECan LTP March 15 \(2\).doc](#)
Importance: Low

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

From: Talbot Ainslie G
Received: 12/04/2015 2:32 p.m.
To: ECInfo; Environment Canterbury; Services Customer; Services Customer
Subject: Submission on ECan LTP

Good morning,

Please find attached my submission on the LTP 2015-2025

I do not want to appear at this stage. I do not want my contact details made public.

Please confirm you have received this submission.

A.G.Talbot

Submission on ECan LTP

A.G. Talbot

Introduction

I am concerned at the cumulative impact of the average ECan rate increases over the next three years, aggregating to nearly 14%; yet again significantly higher than inflation. Christchurch City Council ratepayers are also facing a huge 26% increase in rates over the next three years. This is a huge extra burden on Christchurch citizens and is unacceptable.

These can only be described as usurious demands. Most ratepayers have no recourse to tax write-offs, as with a business or a farm. The system is totally stacked against the residential ratepayer.

These increases are a significant attack on the standard of living of average wage earners in Canterbury and Christchurch and those on fixed income.

Therefore I oppose the level of rate increases for the next three years outlined in this document and submit that there must be more effort made to reduce this annual 4.5% increase and its cumulative impacts with CCC rates.

While I support many of the aims and intentions of this LTP, I submit that there must be a reduction in expenditure across all areas except water management.

My other concern about the consultation document is the lack of detail about proposed increased spending/cuts. What's missing are details about any programme cuts, such as biodiversity. Also missing is specific data which would enable ratepayers to make an accurate assessment whether any proposed programme and increased spending is good value and efficacious.

The document is full of generalisations and aims/aspirations, without supporting detail. It is not sufficient to expect submitters to then go through the ECan website to find supporting detail for these general statements. This is a barrier to good submissions.

Finally in the rating table on page 26 the majority of rate reductions appear to apply to rural areas rather than the majority of ratepayers who live in urban areas. Why is this?

Despite a lack of evidence for most of the statements in the consultation document, I have attempted to make a submission as below

Summary of proposed changes to activities (p5)

1. *Support item 1 relating to better water management.*

2. *Support item 2* relating to public transport and encouraging its use
3. *Do not support item 3* the level of expenditure on reduction of air pollution outside Christchurch. This could be reduced by at least 10% over the next decade.
4. *Support item 4* to provide better data and easier access to that data. This is extremely important in relation to the CWMS
5. Finally re this section it would have been useful to know where there are reductions in funding and by how much? No information readily accessible in this document on this issue.

Better water management

1. 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 ratepayers. This is a failure and should be quite clear.
2. I support the principal of the 'polluter pays' regarding water quality and that most of the targeted rate regarding water quality should fall on the rural sector. Is this happening? If not I oppose the current split/setting of the targeted rate penalising urban ratepayers; urban ratepayers should not have to bear the brunt of rural pollution, and also subsidise a significant increase in land value.
3. There is a statement at the end of the second paragraph which implies that all ZIPs by Zone Committees have been passed by ECan and implemented. Is this correct? If not it should be corrected.
4. There is no detail on these ZIPs and plans and whether or not the limits and levels of nutrient pollution are based on scientific data and analysis. All a fog; most unsatisfactory in trying to determine if the LTP is going to meet freshwater challenges over the next decade.
5. *Support the approach* outlined in the *summary of aims*, so long as there is 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. I would have thought 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 which is inadequate.
6. 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 lack of data is a major failing, and means that the average ratepayer is still not clear as to progress in improving water quality/quantity to date. This is most unsatisfactory and lacks transparency.

7. *Support the two stream augmentation projects* being funded through a targeted rate on those who benefit most.

Natural habitats

1. *Support* the points raised in the summary of aims
2. *Support* the continuing funding of biodiversity projects as described.
3. *Support* using funds to focus on natural corridors, but not at the total exclusion of other projects.
4. *Oppose* reduction in funding for biodiversity projects. I understand there is to be a 50% reduction in funding across a number of biodiversity projects. This is excessive and needs to be reduced.
5. *Support* projects to protect and enhance the ecosystem of Canterbury's braided rivers.

Transport

1. *Support* the general aims in the summary section and the need to increase bus patronage.
2. *Support* ECan investigating and supporting the development of a light rail link to at least one of the outlying commuter towns such as Rolleston, possibly in collaboration with other local authorities. We have seen the public transport shambles in Auckland develop over decades, because of local body incompetence and lack of action in developing an effective and modern public rail system. ECan has an environmental responsibility in this regard; not only to avoid wasteful traffic congestion, but also to mitigate the threat of climate change.
3. Moving towards an effective light rail system which will support the growth of Christchurch is the biggest challenge facing ECan in transport planning.
4. ECan should also *support* any moves by local authorities to encourage the development of cycling and active transport in urban areas. Cycling is *the* most sustainable form of transport, while also being of significant benefit to health, commercial development and well being. It is a disgrace that it has been put on the back-burner and ignored for so long in a city with Christchurch's topography.

Cleaner air

1. In general I *support* the aims outlined in the summary of this section. Certainly it is gratifying to see the previously Dickensian air quality improve in Christchurch over the last two decades. Let's keep the process moving forward and ignore those who incorrectly blame air pollution on anything but wood burners!

Keeping us safe

1. *Support* the aims outlined in the summary at the beginning of this section.
2. Express some concern at the new Regional Pest Management Plan. While the strategy as outlined here seems sensible, I *oppose* current resources being significantly reduced.
3. Pest management costs should be targeted at the communities where pests are located.
4. *Support* the aims expressed in the hazardous waste section. I am most concerned that hazardous waste from the Christchurch rebuild is effectively controlled and any risks avoided. I have some doubts as to whether this has always been effectively managed?
5. Climate change is a major international issue, but sadly there is still a low awareness and a 'head in the sand' attitude amongst the public and politicians regarding future impacts. Put simply the public, and many agencies, are 'turning a blind eye' to the risks of climate change. I therefore *support* careful consideration and increased education regarding the impacts of climate change, and the risk of tsunamis for coastal communities.

Setting the rules

1. *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 enough.
2. *Support* resources for the pollution hotline, however not prepared to pay significantly more for this service.

Regional leadership

1. *Support* most of the aims presented in the summary.
2. *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 because of the dearth of publicly available hard statistical information. This is a serious 'credibility gap' with regard to ECan's statutory role in local government. What is working and what isn't?