From: <u>ECInfo</u>

To: <u>Mailroom Mailbox</u>

**Subject:** FW: Long-Term Plan submission form [#99] EMAIL:05270796

**Date:** Monday, 13 April 2015 9:10:47 a.m.

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

From: Ross Fraser

**Received:** 12/04/2015 8:17 p.m.

To: ECInfo; Environment Canterbury; Services Customer; Services Customer;

Webmaster@ecan.govt.nz

Subject: Long-Term Plan submission form [#99]

Your name \* Fraser Ross

Address \*

Postcode
Contact phone number \*

Mobile number

Email

Date Saturday 12 April 2014

Contact details

• I do not wish my contact details to be made public

## Your submission

- 1 P6 re Better Management here also focus on prevention of water quality loss where this is still high.
- 2 P6 re limits, here the present limits, especially for nitrogen are too high and too lenient as the effects will be felt in the future. For the sake of the environment they need to be lowered so to avoid environmental and economic costs in the future.
- 3. P6 re Farm Plans, while the encouragement of the region's farmers to develop and implement farm environmental plans to help improve water quality is a start. But needs to go further such as when all new applications and renewals are made for resource consents, then such consents be required to have farm environmental plans.
- 4. P6. re urban waterways the work proposed to clean up rivers and streams in urban areas is supported. However prevention of water quality loss where it still exists should be a high priority as well.
- 5. P6 re Natural Habitats firstly all existing natural habitats must be retained especially on the plains of Canterbury. Every effort should be made to prevent the loss of natural habitats and biodiversity including the iconic cabbage trees. The Biodiversity Strategy for Canterbury, at least, should be the basis of action when restoration projects are considered.

While restoration projects can be beneficial greater consideration should be given to projects which mimic the original vegetation and not just be a "window dressing" effort.

The Biodiversity Section of ECan plays an important role in maintaining and restoring Natural Habitats and must be adequately funded to undertake this role. The proposed funding cuts must be discarded and full or increased funding should be reinstated to allow this important aspect of ECan's role to continue uninterrupted.

6. - P7 re Air Quality generally support proposals to improve air quality of Canterbury and especially the South Canterbury area. However, rural burn-offs are generally not acceptable

and much stronger measures are needed to urge farmers to reduce smoke in rural areas to very low levels.

- 7. P8. Controlling plant and animal pests this is a most important function of ECan and funding must be retained to ensure the control of pests is maintained or even increased. More effort must be made to control the spread of wallabies throughout South Canterbury as they are now spreading much further afield.
- 8. P8, Setting the Rules while promoting good farm management practices may be in order for initial approaches there should also be stronger measures put in place, such as conditions on new consents and their renewals that farm environmental farm management plans are a requirement.
- 9. P10, re Better Water management, here regarding nutrient limits prevention should be focus so as to reduce the environmental harm and economic costs in the longer term. The present generous limits for land that is intensively farmed should be reconsidered and lowered to reduce the long term harm to the environment.
- 10. P10, re Farm environmental plans, here it should go further than encourage and require that there be conditions on new applications for resource consents, and renewals, to have farm environmental plans as a condition of those consent approvals.
- 11. P10 re Monitoring, support monitoring of large irrigation and water storage schemes and if not complying with there take conditions then the Council should proceed with enforcement.
- 12. P10, re waterway restoration, here prevention of loss of the natural flora cover should be the first objective and only then should restoration be considered and implemented. And this must mimic what was there before naturally using eco-sourced plant material. Some restoration projects of waterways, in particular, do not follow the pattern of returning the flora to like what existed there in the past.
- 13. –P12 in The Summary improving the region's natural habitats is one of the highest priority of the CWMS objectives and this aim much be carried out throughout all ECan's work to improve natural habitats, especially those that still exist in their natural or near natural form. Prevention of loss of natural habitats should always be the first consideration before actual so call restoration work is undertaken.

## What do you want Environment Canterbury to do?

re better management of water – here focus first on prevention of loss of water quality especially for the long term.

- 1. Improving the regions water quality is a most important function to be worked on.
- 2. Re limits on discharges these limits must be much stronger to effect lower loss of nutrients into the overall environment.
- 3. Re Rural waterways here the implementation of farm environmental plans, with lower limits for harmful nutrients, is supported. And that all new consents and renewals have conditions attached which are required on such farm plans.
- 4. Urban waterways the significant work as proposed is supported especially addressing nutrients limits. Along with the prevention of loss of naturally occurring high water quality.
- 5. Natural habitats, here maintenance of the existing natural biodiversity and the prevention of further loss of this biodiversity, especially on the plains of Canterbury should be a priority.
- 6. Air Quality, here support proposals to improve air quality and also reduce smoke pollution in rural areas as well.
- 7. Controlling animal pests and plant pests is also important and adequate resources must be provided to achieve effective control of these unwanted organisms.
- 8. re Setting of the Rules, especially for environmental farm management plans, promotion may have a place but more is needed such as all new consents or consent renewals to have conditions requiring such environmental plans.
- 9. re Better Water Management here nutrient limits must be in a lower range so to prevent or reduce the impact of these contaminants in the longer term to the environment.

- 10. re Farm environmental farm plans, as stated above should go further than just encourage and that there be conditions on new resource consents and renewals that require such plans.
- 11. re Monitoring support that for large irrigation and storage schemes and if not complying then further enforcement action be taken. Ideally all such schemes should be monitored.
- 12. re waterway restoration here prevention of the loss of biodiversity should be the first aim and if restoration by planting is needed then only the local eco-sourced plant material be used similar to what was originally there.
- 13. re In summary, improving natural habitats should be one of the highest priorities by protection for the adverse effects of stock and clearance. And as stated above use only local species that are similar to what occurred there naturally. Adequate funding for this aspect must be given a high priority.