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**Attachments:** Submission 2018 Canterbury Regional Council.docx

Please find my LTP submission attached.

I wish to attend a hearing in support of my submission.

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## SUBMISSION TO THE CANTERBURY REGIONAL COUNCIL 2018-28 LONG TERM PLAN

S M MCNEILL

20 MARCH 2018

The Canterbury Regional Council operates under the Local Government Act, the Local Government (Rating) Act 2002, as well as other regulations and Acts of New Zealand's parliament. These Acts are both enabling and restrictive in their requirements.

The Council is community and tax-payer funded and exists to deliver for the wider Canterbury community to meet the requirements of New Zealand's Parliament.

In recent years the Canterbury Regional Council has failed the taxpayers and its community.

Across the province it has failed to meet the 'environment' requirements of its branding.

It continues to fail because of insufficient monitoring of consents.

It continues to fail to ensure that water takes are within consent requirements.

It continues to fail to ensure consent compliance requirements associated with fish screens are met.

It has failed to focus on the environment in and around Lake Forsyth.

It has failed to focus on the environment in and around Lake Ellesmere and in the high country lakes.

It continues to fail to ensure animal and plant pests are adequately monitored and controlled.

It continues to fail its community and the environment in the high country, the plains, the towns and cities, and the coasts.

Ecan councillors regularly stray from their governance roles mandated by the Local Government Act, into the roles of management. Instead of setting strategies and ensuring the budget to support those strategies is in place, councillors continue to involve themselves in local government management.

Ecan councillors have failed to ensure that there is full dairy farm effluent discharge consent compliance across Canterbury. These consents are supposed to deliver to a nation-wide strategy and highlight a governance area with a legal component, and where councillors have a role to ensure that Ecan's staff deliver the strategy's requirements. Councillors have allowed a monitoring regime where not all farms are visited, and Ecan's consent compliance methodology continues to be disjointed and disappointing. For those farms inspected, the inspectors rate compliance as A, B, C, or D. The Ecan approach to compliance is to ensure

that the participants are not offended by the intrusion of compliance checks. Surely consent compliance is a simple pass or fail. Ecan's dairy effluent consent compliance methodology is not as bad as some regional councils in New Zealand where aerial inspections are considered to be too intrusive for the consent holders.

There are reports and evidence of cattle beasts in waterways, and there are countless unfenced drains and streams across Canterbury and continuing loss of fresh water habitat. Water continues to be wasted by spraying roads and not fields.

Ecan's current and future long term plan continues past plans where Christchurch subsidises the province without clear and transparent benefits from the subsidy. Most of the Canterbury agriculture sector outputs are export products that pass straight through the city from businesses and factories located in rural areas. Agriculture support businesses are located outside the city. The latest data indicates that agriculture contributes only 1% of Christchurch's GDP and that is mostly from the milk, meat and poultry, and vegetable and fruit sectors for the local market.

Ecan has introduced a new web-based rates information package. It currently indicates the percentages of rates paid per property for general rates and targeted rates for each general delivery portfolio. What the system fails to indicate is precisely where in the province the rates are spent, and the individual projects delivered. There is some granularity, but in the main there is currently too much generalisation for rates collected. It is an improvement in terms of information availability but needs more refinement in order to fully meet the community's needs.

Christchurch rates are used across the province. In order to understand where costs are incurred and in order to allow informed community feedback, Ecan needs to provide costs associated with individual activities. Page 3 of the hard copy consultation document delivered to ratepayers states that, for the first three years of the proposed long term plan, Ecan is "...able to outline in detail the expected activity and the costs associated with that activity." It then fails to do so.

For the community to be able to give meaningful feedback on community priorities, information highlighting where the 53 projects identified for the Freshwater portfolio, or the 47 Hazards projects, or the 46 Bio projects are located. Rainfall data and river-flow monitoring are general across the province (as is indigenous biodiversity) but there are, no doubt, specific projects that can be highlighted for the public to give feedback on priorities as they see them. A large proportion of budget is undefined, and this applies to all portfolios. Costs for each portfolio for each individual data collection project eg rainfall data or river-flow data, scientific research projects, as well as the administrative costs of committees, etc are required. The community may feel that more monitoring is required, with an increase in the number of rain gauging sites; or more river gauging sites to establish more accurately 'leakage' quantities to groundwater, or measure the effects of water take

quantities. Because project costs are not stated it is difficult for the community to 'offer' more funding or suggest a reduction or rebalancing of priorities and budget via the Long Term Plan submission process.

1. As it is sadly too late for the 2018-28 Long Term Plan, will Ecan deliver an annual plan budget for the next annual plan that sets out clearly and transparently where projects are located across the province, their funding source, and the budgets required to deliver each project? (This would be a month or two prior to June 2019)

The proposed 2018-28 Long Term Plan does not mention the use of the Overseer farm compliance software. At the annual plan submissions meeting in 2017 a senior Ecan councillor berated a senior Canterbury farmer regarding the accuracy of the Overseer programme. The Federated Farmers website states that "When it comes to the Overseer model and managing nutrients for water quality, Federated Farmers views that enhancement of the model is required so that measurements become more stable and reliable over time. In the short-term, there are significant limitations that need to be catered for in any allocation or regulatory regime. Other measures may need to be included to ensure innovation is incentivised and that the focus remains on good practice rather than numbers. If modelled estimates in Overseer change then appropriate transition periods should be provided for."

2. Does Ecan propose to base compliance for farm environmental requirements on the Overseer programme?
3. How does Ecan propose to ensure that measures used to monitor nutrient use/effluent disposal compliance on farms are fit for purpose?

The proposal to increase the budget for climate change integration is based on a suggestion that Ecan needs to expand this portfolio. As stated in the proposed LTP document, Ecan portfolios have climate change measures "embedded in them", and "climate change adaptation has long been identified and reflected in Environment Canterbury's work". The supposed need for additional budget is to support information flow. Ecan's current data collection forms the basis for climate change studies, both internal and external to the organisation. Because of duplication of climate change effort across the country there is no real need for additional Ecan funding at this time and the funding should be delayed for a number of years. The proposed 10 year plan and the 30 year plan both already have climate change mitigation built in to the planning and funding for portfolios. Because the current proposal is to be funded from savings there is an opportunity to reduce the overall budget and make savings.

4. Climate change is already provided for within Ecan's 10 year and 30 year plans. Will Ecan Councillors ensure savings are made by delaying the introduction of the proposed method of funding for climate change integration?

Ecan appears to be providing inconsistent scientific advice regarding Canterbury's river water pollution. In the North Canterbury News newspaper Ecan's chief scientist, Dr Tim Davie, states that "the Hurunui at State Highway 7 has a long term E coli issue ....from faecal contamination." This statement is at odds with Ecan's Hurunui water zone committee's 2016 article (on Ecan's website) which states there are no long term problems with water quality in the Hurunui River.

5. Does the 2018-28 Long term plan provide portfolio budgets that will ensure more accurate and consistent scientific reporting across all portfolios?

Ecan's website has a report attributed to the Hurunui-Waiiau water zone committee entitled "No significant long-term decline in water quality for the Hurunui and Waiiau Rivers". The article starts with the words 'We all hope the end of the 2015/16 season will be the start of better times for the rural sector – the Fonterra payout prediction is still below breakeven for most dairy farmers, and dryland farmers still face a tough winter and spring'. The zone committee operates using public funding and the report is not displaying true local government professionalism.

6. Will Ecan insist that, in future, zone committees refrain from issuing general statements?

Ecan's website has warnings regarding toxic cyanobacteria in many rivers. These warnings are not kept up to date. On 06 March 2018 there are warnings dated 12 February, 31 January, 26 January 2018, and 21 December 2017. Many of the rivers listed have had floods and flushing flows and there is no indication whether the information is up to date.

7. Will Ecan provide sufficient budget in the 2018-28 LTP to ensure that cyanobacteria information on the website is current?

The current and proposed water zone committee structure is cumbersome and expensive. The ten committees each have administrative staff assigned and duplication of effort across the portfolio. Payments for meeting facilities and general committee expenses create unnecessary costs across the region. These costs can be cut by a reduction in the number of committees. There is much in common for each zone committee and public funds are being wasted.

8. As is proposed for the pest committees (reduced from 11 to 4), will Councillors look at opportunities for considerable budget savings and reduction in the proposed rates rises, by reducing the excessive number of water zone committees?

The water zone committee structure is promoted by Ecan as being community-driven. Committee members are appointed and not elected, and committee members are therefore not fully representative of all of the Canterbury communities. The long term plan indicates that the committees will be allocated budget for use in their zone areas. Because public funds are to be used, the communities providing the funds should be represented at the committee tables. It is proposed in the LTP that Christchurch ratepayers fund 45.6% of the freshwater portfolio in 2018/19, and on that basis should have 45.6% of the representation on water zone committees across Canterbury.

9. For the 2018-28 long term plan Ecan should appoint members on the basis of true funding representation on the water zone committees. What is the Council view of budget being allocated by committee members who have not funded the programme, and who do not represent the funding community?

The Transport portfolio includes planning for, and delivery of, a subsidised Christchurch bus service with contributing funds from a large rates component via a targeted rate specific to Christchurch ratepayers. Ecan changed the routes which were in place prior to the earthquakes and now operate a 'hubs and spokes' model for bus routes. Bus patronage has fallen as a result of route changes. My own Christchurch bus use has fallen by at least 75% as the 'convenience' of bus use has reduced markedly.

10. Will Ecan revisit the bus route model that is currently in place during the first 3 years of the 2018-28 Long term plan?

There is no mention in the proposed long term plan of any major work planned for Lake Forsyth. The lake suffers from severe water pollution, and in the past there has been mention that partial dredging is the only option to markedly reduce or eliminate the water quality issues. In 2018/19 Christchurch City is scheduled to fund 45.6% of the \$28.95 million freshwater portfolio, and budget from this portfolio should be allocated for major dredging of Lake Forsyth. This will allow ecological improvements for future generations.

11. Divert \$1 million per year from the proposed freshwater budgets for the first 7 years of the proposed 2018-28 long term plan. This budget to be funded using only Christchurch ratepayer funds.

Ecan's compounding rate increases result in a rate take 15% higher than inflation at the end of the 10 year period.

12. Other regions in New Zealand use the term "big" for rates rises similar to those proposed by Ecan. The reasons for rates higher than inflation over the 10 year period are not adequately explained in the draft 2018-28 Long term plan. Did Councillors look to reduce rates by reducing the excessive costs associated with the Freshwater Portfolio, Passenger Transport, Hazards, and Leadership portfolios in particular?

Ecan recognised in its own 2002 published report that surface water seeping underground as well as groundwater from the general area north of the Waimakariri River travelled south-east under the river into Christchurch City aquifers. Actions addressing the concerns regarding the potential for pollution have been delayed for 15 years. Water quality is extremely important for all Canterbury sites, especially those used for human consumption.

13. Is there sufficient budget proposed in the draft 2018-28 Long term plan to fund water quality monitoring of north Christchurch aquifers now, and in the future? Has increased monitoring of surface water and groundwater water quality, and effluent and other land use consent compliance north of the Waimakariri River been put in place using existing budgets, and if not, has sufficient budget been allocated in the

draft 2018-28 Long term plan to allow full monitoring to ensure that the underground water flow paths are fully understood, and that there is 100% consent compliance for all activities north of the river?

The former Environment Waikato now calls itself Waikato Regional Council.

14. Has Environment Canterbury considered dropping the 'branding' name and reverting back to its legal name - Canterbury Regional Council?

Ecan operates with a rates differential based on the timing of property revaluations. New property valuations applied in Waimate District from 01 July 2016; Christchurch City from 01 August 2016, and Hurunui District from 01 September 2016.

15. Why do Waimate and Hurunui farming ratepayers currently pay proportionally less than Christchurch ratepayers for the Canterbury Water Management Strategy when the valuation dates are only 1 month different from the Christchurch revaluations? Does this apparent anomaly continue into the proposed funding strategy for the Freshwater portfolio in the 2018-28 Long Term Plan, and if so, why?

The Canterbury Land and Water Regional Plan sets out the freshwater temperature triggers for ecological health indicators and ecological protection. These water temperatures are 20 degrees Celsius for river systems and 19 degrees Celsius for lakes. Many rivers, including a major braided river, the Waimakariri River, exceeded 20 degrees Celsius for 10 or more days in the 2017/18 summer. The observed deaths of native freshwater species because of high water temperature and the associated reduction in available dissolved oxygen is contrary to one of the main focus areas of the proposed 2018-28 long term plan – indigenous species. According to Ecan staff there are no water temperature-related water take restrictions that relate to the Canterbury Land and Water Regional Plan.

16. Will Ecan introduce water temperature limitations for water takes to support the Canterbury Land and Water Regional Plan river and lake ecological values at the time these water take consents are reviewed prior to their renewal, or in some cases, earlier than the expiry date for the water take consent?

The Biodiversity and Biosecurity portfolio suggests working with landowners for habitat restoration. Ecan owns a considerable area of land across the province. Some areas of land are not required for Ecan purposes and should be sold to private or district council buyers. Ecan should use these land sales funds to buy land for habitat restoration in order to provide surety of ownership and ensure the biodiversity gains of today are not lost in the future.

17. Will Ecan buy land for habitat restoration and by doing so future-proof restored habitats?

The Office of the Auditor-General has a major role in ensuring that the various Acts of Parliament are followed in the preparation of Ecan's 2018-28 Long Term Plan. It has a lesser role for each subsequent Annual Plan and the three year cycle for long term plans are key

moments for both auditors and the community. The Audit New Zealand report in Ecan's consultation document infers that the auditors had access to a level of detail not available to the public. The auditor states that they "...assessed the evidence the Council has to support the information and disclosures in the consultation document." Ecan has project, budget and portfolio information available that it does not disclose to the public. An audit "pass" for the proposed 2018-28 Long term plan seems odd because this information is not available to the public.

18. Will Ecan in future meet the community need for transparency for its budgets and projects and ensure that information is fully available to the public?

In summary, unfortunately, Ecan seems to believe its own media releases, and long term plan consultation documentation, which include statements that the organisation is community focussed. Communities need Ecan to provide environmental protection and environmental improvements for the current and future generations; as well as value for money in everything it does. Ecan continues to fail to provide clear and transparent evidence of these basic requirements of the Local Government Act.