

Make Submission

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Event Name	Long-Term Plan 2018-28 Consultation
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Submission ID	2018-28 LTP -930
Response Date	22/03/18 11:29 PM
Consultation Point	Long-Term Plan 2018-28 (View)
Status	Submitted
Submission Type	Web
Version	0.1

Long-Term Plan 2018-28

Comments on any other policies or strategies in the Full Draft Long-Term Plan.

Comments.

Thank you for the opportunity to submit on the Long Term Plan.

I realise you are busy and will keep my comments general in nature. If specifics are necessary then please ask. I am sure you have considered most of what I have to say in any case.

I should like to be heard if any of these issues are to be discussed.

Monitoring of the Environment:

I believe the amount of money paid for compliance matters by taxpayers is too high. It is not clear from the limited data supplied where this is used. It is reasonable to use rates money to pay for general domestic compliance matters such as smoke and noise but it is not reasonable to use this for industrial compliance. Industry should pay the full cost of adequate monitoring of its activities. This should be managed by a specific rate on each activity.

Water:

There are areas of the district where water is currently over-allocated yet it is possible to purchase land with water rights then transfer those rights to other land. This is illogical in any sense. It should not be possible to transfer water rights to non-contiguous blocks of land or to share water allocation amongst non-contiguous blocks of land.

Currently large businesses are able to purchase land with water rights then aggregate the rights, continuing to over-use them in one area whilst leaving others dry. Current policy is unsuited to the needs of the people or the economy of Canterbury in any term.

ECAN Processes:

It is disappointing to find out how long ECAN expects to complete LOGIMA requests with fairly simple search terms. All documentation should be held in a form such that a reasonably anticipated query should be complete in less than 90 minutes. This would be a valuable use of rates as it is ratepayers in general who need the information held. It is also ratepayers who are least able to afford to pay for the information, which is only hard to find because ECAN systems are outdated.

Quarrying:

It is evident that quarrying is necessary and must be permitted in Canterbury however it is also a substantial blight on those who live nearby.

It is evident that efforts to mitigate the effects of quarrying fail to achieve the stated effects and that the Effects on the Environment from quarrying are always greater than anticipated in any consent hearing.

There is good evidence that respiratory irritants, PM10 (associated with exacerbations of asthma and COPD) and PM2.5 crystalline silica are routinely discharged into the air and affect the environment near to quarries.

The nature of the climate of Canterbury is such that even well- planned mitigation measures will fail frequently.

It is not reasonable to permit the discharge of any potentially hazardous substances from an industrial site.

Given that it is not possible to prevent the discharge of hazardous substances from quarries and that the mitigation measures prescribed fail through poor planning and wilful neglect, it is not appropriate to permit quarrying where it might affect significant numbers of people.

Quarrying should not be permitted within 2000m of any township (a sensible definition of township is required)

General Environment and consent management.

Generally most activities that have potential Effects on the Environment will specify mitigation measures.

Mitigation measures are often approved on the basis of expert advice, usually paid for by the applicant.

The applicant should pay for the full cost of monitoring their activity to ensure that the mitigation measures are having the desired effect.

Where mitigation measures are found not to be effective to the degree specified then the activity should cease until such time as the mitigation measures are altered to comply with original requirements.

Alterations to consents which in any way increase the Effects on the Environment should not be permitted without the consent of affected parties. The applicant should meet all the reasonable expenses of the affected parties.

Thank you

Robert Seddon-Smith