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To: Mailroom Mailbox
Subject: LTP Submission
Attachments: Long Term Plan Submission.docx

Attached please find our submission of the LTP.
We do not wish to attend a hearing.

Regards
Jane and John Henwood
56 Roberta Drive
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Long Term Plan Submission

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Long Term Plan

- Thank you for such a clear, well laid out, easy to read consultation document.
- We generally support the direction and strategies of the Long Term Plan.
- We do not support the ECan byline: Facilitating sustainable development in the Canterbury region. The primary role of an organization called Environment Canterbury must be the protection and regeneration of the Canterbury environment. There is enough research now to prove that when a community has a healthy environment it thrives and obviously development will also thrive. Allow anything to degrade the environment and the activity will eventually fail.
- ECan should be a leader in planning and action to achieve sustainability.
- There is no evidence in the plan of the assessment of costs other than direct economic costs being assessed when decisions are made. It is essential that the future costs of action and inaction are accounted for in decision making. E.g. the cost of removing permitted housing in response to sea level rise; of cleaning polluted water; of providing healthcare for the illness caused by pollution or contamination.

Priorities

- We support the choice of the strategic priorities.
- **Climate Change:** We believe that there should be an additional priority of Climate Change Action which should be a standalone portfolio.
- Climate Change should be not only a hazard requiring response, but a significant issue to be addressed as the priority it is for the entire community. Proactive action is required to assist in climate change prevention, to avoid foreseeable risks and to mitigate unavoidable hazards. For example we see no reference to how sea level rise will impact upon all the other ECan activities or the assessment of ECan activities for Carbon emissions.
- The Local Government Act requires Local Bodies to act for the wellbeing of their communities therefore it could be argued that climate change action is already a requirement. ECan should be lobbying central government for further direction and action.
- ECan should also be actively supporting the proposed Zero Carbon Act.

Regional Leadership

- We support the premise of this portfolio however the merging of the two portfolios will need careful monitoring.
- We support the increased participation of community and interest groups. Increased community engagement and information sharing is the only way to gain compliance and volunteer assistance in ECan's work.
- We believe there needs to be more emphasis placed on monitoring and compliance particularly in regard to activities which have the potential to pollute water in years to come. A proportion of activities and varieties of farming are monitored, this needs to be expanded to all activities to ensure that ECan researches and knows what is happening in all areas of its responsibility.

Freshwater Management

- We fully support the placement of this portfolio as the highest strategic priority. Fresh clean water throughout the region is a privilege for people, not a right. It is a right for indigenous flora and fauna.
- We particularly support the increase in the number of Land Management Advisors.
- The review of historic consents throughout the region is essential and should be done as rapidly as possible with the reviews grouped by catchment areas. All consents should be called in and be reset when a new minimum flow is set without waiting for consents to expire. If necessary constraints should be placed on urban and industrial water takes to ensure farmers feel the responsibility for responding to the needs of the environment is shared.
- We understand that the possibility of existing nitrates in the groundwater reaching the urban water sources is real and believe actions should be taken immediately to prevent the cost of removing them from the entire water supply.
- The cleanliness of freshwater is fundamental to the strategic priority of improving biodiversity. The amount of silt flowing down the Heathcote River recently after exceptionally heavy rain must have seriously damaged the aquatic animals in it. We understand some is a result of the fire and that this sediment is particularly difficult to remove but serious research must go into remedying this problem.
- More resources must be put into the protection of water if we expect to rehabilitate the environment so we can improve the biodiversity. It would be advantageous to begin retrofitting the old storm water management channels in the region.

Biodiversity and Biosecurity

- We support and commend the direction and step-change in effort in this Portfolio.
- We would like to see tight active relationships between ECan, CCC and DOC.
- There is no mention of ECan's responsibility for marine diversity in the plan, at the very least it should be discussed in relation to biosecurity, particularly in relation to the Ports and airports in the region. Beyond that whatever flows into the sea has an impact on the sea and its status should be being measured and monitored.
- We support the expansion of the Banks Peninsula Community Initiative Programme and the plan for the wilding conifer programme.
- The care of our wetlands is essential to obtaining clean water and increased biodiversity and should be a priority as should the braided rivers programme.
- Emphasis should be placed on restoring native flora and fauna to wetlands and waterways to assist cleaning of the water and restoration of fauna.
- All our braided rivers have large areas of weeds/scrub in their channels which is damaging to the river and provides habitat for predators. We suggest two possible solutions. After birds have nested, before winter why should not farmers who border the rivers be required to clear a certain distance of the river with their equipment in return for the privilege of having water rights. The other possibility is that instead of quarrying gravel construction companies could be issued permits for taking some from the river beds at an appropriate time of the year to be stockpiled for their use. This would also prevent the complaints we hear from people who live near rivers about the way in which gravel is building up in the rivers and prevent the health hazards created by quarrying.
- There must be further work on identifying and securing river boundaries to ensure they are not encroached for farming and those that have been should be restored.
- In 2008 ECan produced a Canterbury-wide biodiversity strategy, we would like to see progress against that strategy reviewed and published.
- We believe there would be benefit in using incentives for farmers to increase biodiversity.

Hazards, Risk and Resilience

- We generally support and affirm all the activities described for this portfolio.
- As mentioned above climate change needs its own portfolio, if not a much higher emphasis and increased resourcing. It is not acceptable for ECan to be planning to just respond to the effects of climate change.
- ECan should be actively working on a carbon emissions policy, measurements and interventions for both ECan and the Region.
- ECan should be lobbying government for a planned nationwide regional policy and action plan to mitigate climate change.
- ECan should support the proposed Carbon Zero Act.
- We affirm ECan's decision to oppose deep sea oil prospecting and drilling.

Air Quality

- We generally support and affirm all the activities described for this portfolio.
- We support the concept and plan for providing financial assistance for those who cannot afford to upgrade their home heating/insulation.
- We particularly support ECan's work on air quality. We have recently moved to Christchurch noticed that in general the atmosphere in the city is very dusty and wonder what impact this has on the general respiratory health of the people. When we have commented we have been told the sources are the plains and demolition dust.

Transport and Urban Development

- We note and respect the challenges facing ECan in this portfolio.
- In general we would support the use of the most creativity possible in solving the challenges whilst having respect to climate change, the health of the population, urban renewal and growth plus public mobility requirements all within a limited budget.
- We would support in general the use of cycle lanes, trains, trams and small bus solutions, all working towards reducing carbon output.
- We would support and encourage the investment in the mode of transport of freight from road to rail and shipping to reduce carbon emissions and reduce pressure on roads.
- We support an increase in rates to support public transport.
- More time should have been allowed by government for the return of commuters to the central city. The new buildings are just now opening and workers are returning to the city. Increasing fares will discourage the use of public transport and people will be back in their cars again complaining about the cycle lanes.
- There are lots of health and social benefits to having efficient public transport, we would prefer it if ECan could find funding to continue to support the current level of service.
- We do not support the discontinuation of the six lowest performing routes. We understand they have low usage but who are the current users and why are they using the route? Could a different form of transport be provided for them? Why are local people not using the routes – should they be adjusted? Do all these routes have small buses on them? Could the service be reduced to several times a day which would serve the people's purpose?
- We do not support the reduction in the Total Mobility subsidy; surely cutting subsidy on 3% of trips would not make that much difference.

Revenue and Financing Policy

- We fully accept the proposed increase in rates to fund the required work of ECan and restore the reserves.
- We do not support the expansion in the scope of the Uniform Annual General Charge (UAGC) as it disproportionately affects ratepayers with lower value properties. There is no reason why Recreational Boating safety work should be added to the UAGC, it appears that this iniquitous charge is being incrementally increased with no justification.