

From: Kyle Sutherland <suthy2@hotmail.com>
Sent: Monday, 26 March 2018 12:09 p.m.
To: Mailroom Mailbox
Subject: LTP SUBMISSION
Attachments: LTP Submission - Kyle Sutherland.docx

Hi there,

I have tried making a submission using the online portal but it is terrible to navigate and use. Please delete my submission made online as it only contained the first option.

Please see attached my full LTP submission.

Please can you confirm for me that the online submission has been deleted and this attached submission used instead?

Many thanks,
Kyle Sutherland

Environment Canterbury LTP Submission - Kyle Sutherland 25/03/2018

Whole Plan:

I generally disagree with the activity proposed for the Long-Term Plan.

The purpose of Environment Canterbury is to 'Facilitate sustainable development for the Canterbury Region'. What we have seen over the past 7 years has been the complete opposite of sustainable development. Intensive farming has increased dramatically, freshwater quality has decreased dramatically and more freshwater species are facing extinction than ever before. The LTP needs more focus on the overall purpose of the organisation, key word being 'sustainable'. Allowing new irrigation schemes such as CPW is the opposite of sustainable development, and will only lead to further intensification on already overstocked land.

ECan either needs to remove the word 'sustainable' from its purpose to match the current reality, or preferably start protecting our environment from commercial exploitation.

The LTP online portal needs to be upgraded as currently it is hard to navigate, save drafts and submit correctly.

Public Transport

Option 2 – larger rates but no fare increase

I believe that fares should stay the same to encourage more people to travel by public transport as the fare alone does not factor in the wider benefit to our City ie, less congestion, less pollution, less need for parking etc. Any bus routes which are making big losses should be reviewed to see whether alternative routes can be established or whether those routes need to be discontinued. This could mean smaller buses for the routes or targeted fares.

Freshwater Management

I generally disagree with the activity proposed for Freshwater Management.

Freshwater management, or lack of, is the biggest environmental issue facing our region. Since having democratically elected councillors sacked in 2010 and replaced by pro-farming commissioners, freshwater quality has paid the price. Commercial activities have had consents granted with little to no thought of impact on our waterways, nor the species which rely on it for survival.

Minimum flow levels need to be increased and there also needs to be catchment-wide consent reviews, with the ability to revoke consents to meet the overall 'sustainable development' purpose of ECan.

The CPW irrigation scheme should have consent revoked on the basis that the current nitrogen load in the Selwyn-Waihora catchment is 3200 tonnes a year, and with the addition of CPW it will rise to 4800 tonnes. This is not sustainable development.

There needs to be more reporting on negative environmental externalities rather than just focus on economic benefits to the region. As ratepayers, we deserve to know the full picture including at what cost to our environment these profits were made from. Examples being cost of treating

drinking water, cost to recreational water users, cost to clean up polluted waterways, cost to our threatened native freshwater species.

Biodiversity:

I generally disagree with the activity proposed for Biodiversity and Biosecurity.

With only 3% of expenditure going on Wetlands and 5% on braided rivers, more focus needs to be placed on restoring and protecting native eco-systems such as wetlands and rivers, and regenerating more areas for this purpose. This can be done alongside Department of Conservation as well other NGO organisations such as Forest & Bird.

Environment Canterbury (ECan) research found that nearly 12,000 hectares of Canterbury's river margins had been taken over by intensive farming between 1990 and 2012. There needs to be a strong call from ECan for this land to be taken back into public ownership and restored to allow biodiversity to thrive in these areas. Braided rivers need much more protection and more resources for enforcement.

<https://www.stuff.co.nz/environment/88605503/over-the-line-rivers-being-whittled-away>

For pest management, GoodNature Gas resetting traps need to be investigated by ECan for region wide roll out to control pests such as possums and rats.

Risks & Hazards:

I generally disagree with the activity proposed for Hazards, Risk and Resilience.

There needs to be a lot more than 2% resourcing for climate change adaption, considering how large the impact is going to be for our already dry region. This includes annual reporting on Greenhouse Gas emissions per sub region in Canterbury, and the calculation of the effects climate change will have on our region such as longer droughts, rising seas and bigger storms.

Risks to our drinking water from intensive farming such as nitrates leeching into aquifers needs more attention, resourcing and action to prevent our cities water source from being polluted. Water bottling consents also need to be reviewed and any that pull from our cities drinking water revoked.

ECan should not be granting consents for the Christchurch City Council to dump raw sewage into our rivers, and instead suggest the upgrading of infrastructure alongside creation of wetlands in the red zone to treat stormwater before it makes it into our rivers. More reporting is necessary on how much pollution is currently making it into our waterways through these consents.

Air Quality:

I generally agree with the activity proposed for the Air Quality.

There needs to be stricter rules for farming burn offs. These create large amounts of pollution visible from any of the mountains surrounding Christchurch.

Transport and Urban Development:

I generally disagree with the activity proposed for Transport and Urban Development.

ECan needs to seriously look into light rail options for between Rangiora and the City and also between Rolleston and the City. Congestion is only getting worse and the longer the council leaves the inevitable roll out of rail, the more it is going to cost.

Regional Leadership:

I generally disagree with the activity proposed for Regional Leadership.

More resources need to be applied to permitted activity monitoring given the large number of farms this covers. There needs to be much tougher penalties for non-compliance and more resources applied to more compliance officers to ensure farmers are meeting their obligations under the law.

Millions of litres of water was taken illegally by irrigators in this 2016 report, which resulted in few fines and no prosecutions. This is incredibly poor. The report also states that 500 large scale users are still not measuring takes, has this been remedied? If not, where are the enforcement officers and where are the prosecutions? <https://www.stuff.co.nz/business/farming/81191467/Millions-of-litres-of-water-illegally-taken-Is-ECan-doing-enough>

There was also 500 complaints about stock in waterways in 2016, with no prosecutions. The fines for these infringements needs to be increased so that more compliance officers can be hired to ensure farms are meeting full compliance. <https://www.stuff.co.nz/business/farming/76307444/nearly-500-complaints-about-stock-in-waterways-no-prosecutions>

Plan Change 5 is a great step in the right direction, but needs to be properly resourced to ensure the environment is protected long term. This would include the ability for ECan to revoke consents if required and enforce harsh penalties for those that do not comply.