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To: Mailroom Mailbox
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Attachments: CCC submission on ECan LTP.PDF

Good afternoon

Please find attached the Christchurch City Council submission on the ECan LTP 2018-28.

Many thanks
Libby

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Christchurch City Council

26 March 2018

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Christchurch City Council submission on the Long-term Plan 2018-2028

Introduction

Christchurch City Council (the Council) thanks Environment Canterbury for the opportunity to provide comment on its draft Long-term Plan 2018-2028. The Council values its ongoing working relationships with Environment Canterbury at both the governance and management levels highly, and looks forward to engaging with Environment Canterbury over the period of its draft Long-term Plan and beyond.

The Council is also commenting on the draft Regional Land Transport Plan, in a separate submission. We do not wish to be heard on either of our submissions.

Submissions

1. General comments

- We recommend that, while water and biodiversity should be two priorities in Environment Canterbury's draft Long-term Plan 2018-28 (LTP), there should be a re-balancing for a more equitable outcomes across all the portfolios, and support for studies of natural hazards with respect to their exacerbation by climate change.

2. Freshwater management

- The Council is committed to improving water quality, including stormwater and flood protection, and has identified *safe and sustainable water supply and improved waterways* as one of its six strategic priorities. We support Environment Canterbury's work relating to fresh water, including:
    - annual monitoring of ecosystem health at 183 sites in the region. Data from sites within Christchurch district may be useful in monitoring outcomes for restoration projects if monitoring sites correspond with restoration project sites;
    - the delivery of programmes to restore Te Waihora and a corresponding increase in funding for the first three years of the LTP;
    - funding for science to support greater understanding of aquifer systems and groundwater quality and quantity to provide more robust management of groundwater resources;
    - delivery of programmes to enhance surface and groundwater protection such as the Resource Management Act Water Framework and Zone & Regional Delivery programmes as well as the Planning, Consenting & Compliance programme;

- funding for review of plans and polices to provide for robust groundwater management. As the draft LTP acknowledges, some aquifers and rivers are over-allocated and the process by which existing water takes in an over-allocated zone could be on-sold to another party needs a review.

- We are concerned that the proposed reduction to the Resource Management Act Water Framework programme in years 1 through 3 would adversely affect progress on protecting freshwater resources through the setting of environmental limits. We suggest the review of the regulatory framework for considering change of use for water consents is brought forward, and there is provision of adequate funding to enable robust statutory processes to protect our freshwater resources, particularly the aquifers that supply potable water to Christchurch.
- We suggest that zone committees are provided with an additional 'fresh water' fund to allow zone committees to fund projects to enhance or improve water quality or ecosystem health. Currently the only funding that zone committees can allocate is for the immediate steps biodiversity fund, for which there are strict criteria.

3. Biodiversity and biosecurity

- We support increased investment in biodiversity and biosecurity programmes generally, and Environment Canterbury's emphasis on collaboration with multiple agencies, groups and landowners.
- We support investment in data collection, provision of technical support and outcome monitoring to ensure that work done in the biodiversity and biosecurity area is having the desired effect. We suggest that alongside these activities, there needs to be provision for/development of effective means of sharing data with collaborating agencies to improve the efficiency and impact of biodiversity and pest control work throughout the region.
- We support the expansion of the Banks Peninsula Community Initiative Programme to include a broader area and wider range of pests, and explicit alignment with the long-term vision for a pest-free Banks Peninsula. However, the budget increase proposed for biosecurity may be insufficient to support significant expansion of this programme alongside the expansion of other biosecurity programmes.
- We support the initiation of braided river projects. While this work may not directly involve sites in the Christchurch/Banks Peninsula district, there will be a positive impact on wider/adjacent ecosystems within the district, and positive impacts on indigenous species that move between braided river habitats and other habitats within the Christchurch/Banks Peninsula district.
- We support implementation of a programme to protect and enhance wetlands on private land. There are likely to be small wetland areas on private land within the Christchurch/Banks Peninsula district that could benefit from inclusion in this programme, potentially in conjunction with the Council's Biodiversity Fund.
- We encourage Environment Canterbury to add a biodiversity programme to address the Canterbury low plains dryland ecosystems. These are among the most threatened biodiversity systems nationally and long-term sustainability is an issue, especially in the face of agricultural intensification, development and land use changes. These areas are not only threatened and subject to continuing loss but also have very low public profile.
- We suggest an increase in funding for the immediate steps in the biodiversity programme to further support the gains achieved by the zone committees to enhance biodiversity.

4. Hazards, risk and resilience

- We support a greater integration of climate change impacts in the hazards work stream. Looking at hazards only as they are at present will not provide an adequate basis for climate change adaptation. Hazards should also be studied in terms of how they will be exacerbated in future as weather patterns change and sea levels rise. This does not only apply to flooding and coastal hazards, but also land stability and shallowing of groundwater table issues (which in turn exacerbates flooding and liquefaction potential).

- We would like to see hazard studies that include multihazards and cascading hazards, rather than looking at the listed hazards one by one.

- We would very much like to see Environment Canterbury start shifting into studying risk rather than just hazard (ie it would be very beneficial to be working with exposure to hazard and consequences of various kinds, as well as with the hazards themselves). This would make Environment Canterbury's work much more applicable and useful to urban planning, infrastructure management and civil defence and emergency management. Work involving changing population, demographics and land and water use in Canterbury, and how this might change risk exposure in the future would also be useful.

- We recommend shallowing of groundwater in the list of hazards (at the top of page 31) as this is becoming one of the biggest issues (and it exacerbates other hazards such as flooding and liquefaction potential).

- We support studies on land stability in Canterbury and hope to see at least some high-level study to identify areas that could potentially fail in earthquakes, or become more prone to failure with increasing intensity of rainfall. Pre-event identification of where landslide dams could form could be really helpful at the time of an earthquake response.

- We would like to know whether Environment Canterbury are still monitoring landslide dams, and whether they intend to continue doing so.

- We support further study on palaeotsunami and distant source tsunami. We are aware that there is also a need for study into regional and local source tsunami, and would like to see Environment Canterbury continue to work in this area. (Kaikōura district needs rerunning of all sources of tsunami, Hurunui and Waimate regional as well as distant source, and new information suggests that Hurunui District and the bays of Banks Peninsula may need local source modelling to define their exposure). Regional source hazard for Kaikōura south to (and including) Banks Peninsula needs further study

5. Air quality

- We congratulate Environment Canterbury on the improvement in air quality in Christchurch over the last ten years.

- We acknowledge Environment Canterbury's regional leadership across this portfolio, including the monitoring and compliance of air quality. We suggest that responsiveness to public concerns could be increased, for example, though additional resourcing of the Pollution Hotline to increase turnaround on after-hours complaints and perceived lack of follow-up on enquiries. This could be achieved through an appropriate level of service that recognises the significance of the complaint and ensuring that conditions of consent for

discharges provide for adequate monitoring and response to complaints. We suggest that Environment Canterbury look at the balance of whether it could charge more or a higher proportion of the costs of enforcing consents to consent holders.

6. Transport and Urban Development

As a key partner organisation we note that the Council works with Environment Canterbury on most aspects of the transport and urban development portfolio, especially through the Regional Transport Committee, Greater Christchurch Public Transport Joint Committee and Greater Christchurch Partnership Committee. The Council would like to make the following comments:

Regional Transport

- Urban transport is a priority for Christchurch and is essential to supporting the regeneration and growth of our city. The Council recommends that overall, Environment Canterbury places a greater priority on the role of urban transport, especially the improvement of public transport in Greater Christchurch. The Council would like to see Public Transport listed alongside other priorities such as Freshwater Management and Indigenous Biodiversity.

- The Council supports the work on the Regional Land Transport Plan, and the new priority initiatives agreed by the Regional Transport Committee, especially to increase advocacy to central government on transport policy. We recommend that this conversation be extended to include public transport funding and procurement policy. Central government has signalled changes to the Government Policy Statement on Land Transport. This presents a unique opportunity to further discuss with central government the need for a change in public transport investment in Greater Christchurch.

Public Transport

- The Council urges Environment Canterbury to consider the wider importance of public transport. The Council is concerned that the key objectives for public transport do not reflect the social, economic and environmental aspects that the system plays in supporting liveable, accessible and economically viable communities.

- In Christchurch, transport is a significant contributor to climate change through the release of greenhouse gases. Current estimates from the draft Christchurch Community Carbon Footprint (2016/17) are that emissions from transportation represent the largest emissions sources for Christchurch, contributing around 53% (based on tCO2e) to the overall emissions. The majority of the transportation emissions are a result of road transport, with petrol and diesel use together contributing to approximately 41% to Christchurch's gross emissions. Reducing transport emissions will also help mitigate the impact of climate change on biodiversity, water and the coastal environment. Public transport plays a critical role in reducing carbon emissions. The Council recommends that the public transport level of services include a new measure for carbon emissions.

- There is a very strong concern that the removal of six bus routes, before the transition to the new network, will reduce access to public transport across the city. The Regional Public Transport Plan will introduce a new public transport network and the opportunity to address the levels of service to the community within a two year timeframe. The Council will continue to work with Environment Canterbury in the preparation of the Regional Public Transport Plan. However, in the short term Council strongly urges Environment Canterbury to investigate additional financial options (or increased utilisation approaches) while the transition to the new public transport network occurs over the new two years – and therefore that the six bus routes are not removed at this juncture.

- The Council is also concerned that all three of the proposed funding options look to reduce the Total Mobility subsidy and to cut six existing routes. The Council recommends that Environment Canterbury consider another option to allow the continued service of the six routes and maintain the Total Mobility subsidy in the short term. The Council urges Environment Canterbury to include a two year targeted rate increase to cover the funding shortfall while the public transport network is developed.
- The Council recommends that the public transport Level of Service measure *2.5.3 Proportion of total trips made by public transport in greater Christchurch* is updated to reflect the agreed targets currently being developed through the draft Regional Public Transport Plan.

7. Revenue and Financing Policy

Healthier Homes Canterbury

- We strongly support Environment Canterbury's proposal to establish a new Healthier Homes Canterbury service that will allow eligible home owners to receive a nine year loan for insulation and heating improvements, valued up to $6000, to be paid back through property rates. Through this service, approximately 3,000 homes in Canterbury will be made warmer each year improving air quality and the well-being of our community. This service complements existing Warm-up NZ Homes subsides available from EECA; advice available from the Council's Build Back Smarter service; and new requirements to insulate rental properties.
- We recommend that the eligibility criteria should be less restrictive to ensure as many people as possible are able to update their homes, for example middle-income property owners or landlords housing low-income tenants.
- The Council would like to collaborate with Environment Canterbury on the implementation of this service in Christchurch to ensure a seamless whole-of-home advice and funding service is provided to our residents. We suggest that providers employed to deliver this service be trained Home Performance Advisors to ensure the best advice is given to residents through this service.

Conclusion

Summary of recommendations:

We suggest:

1. there should be a re-balancing for a more equitable outcomes across all the portfolios, and support for studies of natural hazards with respect to their exacerbation by climate change

Freshwater management

2. the review of the regulatory framework for considering change of use for water consents is brought forward, and there is provision of adequate funding to enable robust statutory processes to protect our freshwater resources, particularly the aquifers that supply potable water to Christchurch
3. zone committees be provided with an additional 'fresh water' fund to allow zone committees to fund projects to enhance or improve water quality or ecosystem health.

Biodiversity and biosecurity

4. the provision for/development of effective means of sharing data with collaborating agencies is allowed to improve the efficiency and impact of biodiversity and pest control work throughout the region
5. revising the budget amount proposed for biosecurity, as it may be insufficient to support significant expansion of this programme alongside the expansion of other biosecurity programmes
6. adding a biodiversity programme to address the Canterbury low plains dryland ecosystems
7. increasing funding for the immediate steps in the biodiversity programme to further support the gains achieved by the zone committees to enhance biodiversity.

Hazards, risk and resilience

8. extending the programme of hazard studies to include:
    a. multihazards and cascading hazards, rather than looking at the listed hazards one by one
    b. risk (rather than just hazard) to be applicable and useful to urban planning, infrastructure management and civil defence and emergency management
    c. identification of areas that could potentially fail in earthquakes, or become more prone to failure with increasing intensity of rainfall
    d. further study on regional source hazard for Kaikōura south to (and including) Banks Peninsula
9. the addition of shallowing of groundwater in the list of hazards (at the top of page 31) as this is becoming one of the biggest issues (and it exacerbates other hazards such as flooding and liquefaction potential)

Air quality

10. increasing the responsiveness to public concerns, for example, though additional resourcing of the Pollution Hotline to increase turnaround on after-hours complaints and perceived lack of follow-up on enquiries, through an appropriate level of service.
11. looking at the balance of whether it could charge more or a higher proportion of the costs of enforcing consents to consent holders.

Transport and Urban Development

12. that a greater priority is placed on the role of urban transport, especially the improvement of public transport in Greater Christchurch. The Council would like to see Public Transport listed alongside other priorities such as Freshwater Management and Indigenous Biodiversity
13. We support the work on the Regional Land Transport Plan and suggest this conversation be extended to include public transport funding and procurement policy
14. suggest the wider importance of public transport is considered, and ensure the key objectives reflect the social, economic and environmental aspects of the transport system for the community.
15. the public transport level of services include a new measure for carbon emissions
16. investigating additional financial options (or increased utilisation approaches) while the transition to the new public transport network occurs over the new two years – and therefore that the six bus routes are not removed at this juncture
17. considering another option to allow the continued service of the six routes and maintain the Total Mobility subsidy in the short term.
18. updating the public transport Level of Service measure *2.5.3 Proportion of total trips made by public transport in greater Christchurch* o reflect the agreed targets currently being developed through the draft Regional Public Transport Plan

Revenue and Financing Policy

19. making the Healthier Homes eligibility criteria less restrictive to ensure as many people as possible are able to update their homes
20. The Council would like to collaborate with Environment Canterbury on the implementation of this service in Christchurch to ensure a seamless whole-of-home advice and funding service is provided to our residents, and suggest that providers employed to deliver this service be trained Home Performance Advisors.

Thank you again for the opportunity to provide this submission.

If you require clarification on points within this submission in relation to transport please contact Rae-Anne Kurucz, Team Leader Transport at Rae-Anne.Kurucz@ccc.govt.nz. For all other points, please contact Clive Appleton, Team Leader Natural Environment at Clive.Appleton@ccc.govt.nz.

Yours faithfully

Lianne Dalziel
MAYOR OF CHRISTCHURCH