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Sent: Monday, 26 March 2018 12:43 p.m.
To: Mailroom Mailbox
Subject: LTP Submission
Attachments: ECANLTP Submission ChrysHorn.pdf

Kia ora
Please find my submission on the Draft LTP attached.
Many thanks for the opportunity to submit

All the best

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I wish to be heard in support of this submission.

RE Draft Long Term Plan 2018-2028

Thank you for the opportunity to submit on this document. I am a resident of Halswell, and involved in various community projects, mostly in the south of Christchurch. My comments are based on my experience of working with a range of environmental groups and my professional interest in sustainable management of our resources.

I've sent out my comments based on the overall structure of the 2018 LTP draft.

“Facilitating Sustainable development” ?

I see little or no evidence that sustainability is in any way possible along with never ending economic growth. The events of the last few decades in Canterbury – specifically seeing rapid climate change happening, our water quality and quantity has deteriorated over the last decade, the depletion of our soil resources and nutrients for plant growth and the erosion of our coasts – would all indicate that, indeed, a focus on economic growth is unsustainable.

The list above indicates that we are losing our capacity to provide for the physical, social and cultural needs of residents of the region and the country. Environment Canterbury must provide leadership on these issues in our local communities and advocate on our behalf to central government and other agencies that influence this space.

Please change your purpose to “Enhancing our Environmental Resources” The rest of the wellbeings will follow as your discussion later implies.

Priorities

Yes I believe your priorities are in line with the priorities of Canterbury people. I would also add that there may actually be higher priorities which we were not asked about in the initial process. I refer here to the escalating climate crisis which will affect the top two priorities you mention here. I understand that this has not yet been acknowledged by the legislation under which the Regional Council operates. However, freshwater AND biodiversity will both be affected in all sorts of ways by climate change and it will be affected by your work in public transport and possibly Air quality. Biodiversity doesn't stand a chance without a focus on biosecurity and pest work.

I note that many of the things that the Regional council must look after and should look after are affected by the work of other councils and agencies. Run off from the roads affects water quality, Climate change is affecting water quantity, water quality, biodiversity and hazards. Public transport is affected by roading and road congestion and urban development, to name a few. To me, this highlights the importance of Regional leadership work. Essentially almost NOTHING can be achieved without working with both the residents of Canterbury and central Government. Regional leadership activities are vital in managing these connections.

Please:

Look at how you can work on climate change as part of the priorities you have already outlined.

Advocate to get the legislation changed so regional councils everywhere can work on this issue alongside other agencies. You have a supportive government in at present – this should not be hard.

Consider moving the Regional leadership work to the beginning or end of the LTP and highlighting the importance of it for all aspects of your work.

Add “community groups” to your list of regional partners. These may be implicated in the NGO category but many groups are informal and won't recognise themselves there. Community groups do a lot both practically on the ground in all parts of the work that Environment Canterbury does. They also help to educate people around them and feed back information to Environment Canterbury through processes like this. At the very least, they need acknowledgment!

Extend the CWMS approach

The collaborative approach used in the CWMS has really changed the way the Regional council works with communities, business, Ngāi Tahu and NGOs. It would be nice to see this collaborative style of working used more in the other areas of the Council's work e.g. public transport and hazard management. Communities have a lot of knowledge about their own needs and values, and how the system currently works for or against their interests that could be useful in improving the use and effectiveness of our public transport system.

To some extent it IS already happening in the area of biodiversity since the Zone committees have an interest in this.

Please

Think about how you can extend the CWMS collaborative approach into all aspects of Environment Canterbury's work.

Freshwater Management

As I would expect, this part of the plan is largely good and I strongly support it. I am a fan of the CWMS although I am much less supportive of the development "targets" imposed by Central Government.

Please advocate to allow communities to have more say in setting their own targets. Targets should be conditional on existing water quality standards and overall catchment flow rates. Development/ intensification should not happen where there are already problems. It should only happen when there is evidence that management practices can mitigate the effects of that development.

The well documented deterioration of our waterways over the last decades indicate that we already intensified too much. Swimming in the Selwyn River is now a rare thing, eels from Te Wairewa cannot be eaten safely because of the algal blooms there, Te Waihora is murky and subject to algal blooms. Algal blooms continue to affect the Selwyn which also dries out regularly. We should not be intensifying more until we see that new farming practices are taking hold and are resulting in cleaner waterways with water in them.

I disagree that there is an "abundance of freshwater". Clearly in some catchments, there is not, as evidenced by regular low flows and algal blooms. Increasing heat and drought as our climate continues to change will exacerbate the issues we already have. Our water management needs to be precautionary and ahead of the game on this. Please acknowledge this in the plan.

A stepwise adaptive approach to development could help us see if new developments actually do as they say they will

Plastic is an issue both in our waterways, and in our oceans – it gets no mention and yet it IS something that we can be doing to clean up urban waterways in particular. Please mention it at least as an issue that needs attention.

I strongly support the idea of catchment consent reviews as part of or even an alternative to plan changes. This is likely to make plan changes more effective more quickly. We need to be working to undo past over-allocation and to monitor and enforce current water allocations.

Please keep using land management advisors – in both cultural and farmer support roles. The advisors are an asset to the Council and this work will not be as successful without them.

Biodiversity and Biosecurity

The work in this area is important and involves supporting the work of many community groups. There is good energy in our community for helping with pest control and seeing the restoration of native flora and fauna.

I strongly support expanding the Banks Peninsula Community Initiative Programme to include the Port Hills. The idea of a pest free Banks Peninsula is easily understood and a great (if difficult) vision to work towards.

I support the use of targeted rates for the Port Hills to fund this.

Please consider how biodiversity restoration work might help build some resilience as our climate changes. E.g. advocating to restore wetlands in the Red Zone in Christchurch could create a buffer against storm surges as our sea levels rise. This will almost certainly apply in a wider range of coastal areas throughout Canterbury. This could be as simple as giving priority to restoration projects that also have this element.

Please allow for the protection of existing native biodiversity in this plan. We will also need restoration but it makes little sense to focus on restoration without also protecting what already exists.

Please make more explicit the ways in which biodiversity contributes to water quality, resilience, soil conservation.

Please encourage the protection of what biodiversity we already have as well as encouraging restoration

Hazards Risk and Resilience

I'm surprised at the ambulance at the bottom of the cliff approach in this section as implied by having only 2% of this budget focused on 'climate change integration' while 8% is provided for emergency management.

Is all the Council is going to do in the Climate Change space over the next ten years just inform people about the hazards? To what end? Given climate changes is moving faster than the forecasts led us to believe, that seems wholly inadequate.

Please work with community groups, other local government organisation and central government to change the law around how you can work in the climate change space.

A programme of work around climate change is vital to the future of our region. Climate will affect our environment, economy as well as our health and food security. As such *the Council must have a much more active role in planning for both limiting the amount of climate change we contribute to in Canterbury AND preparing communities and building their resilience against the forecast changes in our weather and sea level.*

Residents of Christchurch City have one of the highest carbon footprints in New Zealand. Businesses including farmers and horticulturalists in Canterbury (as in other parts of the country) stand to lose a great deal as the climate changes too quickly for them to adapt. We MUST be working together to reduce climate change causing activities (and transport makes up a large part of this), and we need our public agencies to be on board and working together on this. We also need work helping people to adapt by learning and passing on that learning.

I understand that on the surface, the legislation guiding your activities doesn't support further work in this area but that needs to change. Please advocate to changethis.

Begin the conversation with Central Government agencies and your community to get this changed.

Consider using the leverage you have in managing freshwater, biodiversity, our coasts and public transport to step into this space and start work.

Consider how you can extend your work in these existing areas to include climate change mitigation and adaptation as well as information.

Lead the charge in this area by showing how you are actively working to become carbon neutral as an organisation and to be working with the CCC to encourage and assist Cantabrians to lower their collective carbon footprint.

Air Quality

I support the cleaner home heating work that is going on in the Council – particularly that of helping people make their homes warmer and drier.

Public Transport

I agree that we DO need a resilient multi modal transport system that does all that is outlined on Page 3 of the summary. However, this part of the LTP doesn't appear to be a plan to achieve that.

Please:

Provide discussion of how public transport fits into the wider "multimodal" transport system. Please discuss what make the system resilient.

Include some discussion of what should we be doing in the greater Christchurch and the region to make the vision reality?

Develop an actual 10 year plan for making our public transport system more effective and aligned to people's transport needs with an eye to improving the use of public transport.

Develop some stretch goals around this.

Consider a more collaborative approach for managing public transport. At the very least, be transparent in how decisions about bus routes and other possible transport

options are made. Talk directly with the communities where public transport is not working well.

Work with the CCC and NZTA to commission some evaluation of why people do or do not use public transport. This should include a needs analysis and it should not be a one off – it should be repeated every three years and used in formulating the next LTPs.

Include some strategy around encouraging people to use public and active transport modes and the groups you could work with to achieve this – NZTA, CPH, CCC, Universities and Ara, Community groups such as Spokes and Living Streets come to mind and I'm sure there are more.

In Longhurst in Halswell, there is an informal park and ride – people leave their cars parked along the road and catch the bus. Please would Environment Canterbury work with the CCC to encourage and extend what is going on here. I'm sure this is not the only place in Canterbury where this happens so please think about how to find out what is already going on and extend that.

Bikes on buses work well. However on some routes (eg through the Lyttelton Tunnel and between Lincoln and the City) two bike racks per bus is simply not enough and people have given up trying to use the bus because it is not a reliable service. *Please show how Environment Canterbury is working to increase this capacity particularly around rush hour.*

In Halswell where I live the Residents Association have done some systematic observations and found that buses are full every morning. This means there is no capacity for more people to catch a bus at certain times of the morning. One might assume that this happens in other parts of the city as well. Please who how Environment Canterbury plans to increase capacity at these times.

Please adjust bus timetables to account for different travel times at rush hour and at other times of the day. Surely you have noticed that it takes longer for buses to travel their routes during rush hours? Environment Canterbury MUST have access to data from GPSs on buses and should to be able to manage this more intelligently than is currently the case.

Please plan to work the Council and NZTA to put in more bus lanes. We could really use them on the route from Halswell into the city to speed up the buses at rush hour! Please advocate to set this up in sections of that route where double lanes already exist on that route. They could be used for buses and cars with more than one person in them during rush hour.

I do NOT support any of the options for cutting back public transport routes. I believe a rates increase is warranted to keep these routes open. I'd like to see Environment Canterbury working with the communities involved to see how to

increase bus patronage (and if changing the routes is an option then that seems like a good idea)

Please work with the CCC and NGOs to lobby for being able to use a regional petrol tax.