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Please find our submission attached.

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# **ENVIRONMENT CANTERBURY LONG TERM PLAN 2018~2028**

SUBMISSION BY BECKENHAM NEIGHBOURHOOD ASSOCIATION INCORPORATED

## **PREAMBLE**

1 After years of government-imposed regional dictatorship and taxation without representation, we welcome ECan's acknowledgement of the need for community input. We look forward to a full restoration of regional democracy, and the elimination of all appointed members, within the life of the proposed LTP.

2. As one important result of that restoration, we expect to see a significant general shift away from emphasis on the extraction of commercial value from the environment and towards a greater emphasis on conservation, protection, and environmental rehabilitation. This general expectation relates with particular force to the management of freshwater as discussed below.

3. We see much that is positive in the proposed draft LTP; however, as will be seen below, we also have a number of concerns.

## **REGIONAL LEADERSHIP**

4 Given the role and responsibilities of ECan, we take it for granted that regional leadership by ECan "goes with the territory"; but that leadership must not degenerate into dictatorship or its attempted exercise. The history of Canterbury regional government since April 2010 makes the manner in which such leadership is exercised a matter of major importance. We expect such leadership to be exercised in a responsive manner that acknowledges the Council's accountability to the people of Canterbury. As part of that expectation, we wish to emphasize that future regional leadership by ECan will only be acceptable to us under an ECan that *in its entirety* is democratically elected and accountable to Canterbury voters of all ethnicities and affiliations, with no appointed members beyond the present term of the Council.

5 As regards relations with Ngai Tahu, to which the LTP rightly attaches importance, we note the present arrangement made by the previous Government whereby Ngai Tahu was able to appoint representatives to sit on the current partially-elected Regional Council. The result of this is that a corporate entity whose business interests and activities include the extraction of commercial value from the environment has direct representation on a body charged with regulating such interests and activities. As a matter of principle we do not consider such an arrangement to be either democratic or ethically appropriate, and accordingly we are strongly of the view that the presence of Ngai Tahu appointees on ECan should not continue beyond the current term of the Council.

6. We strongly favour Māori representation on a future democratic ECan, and we also recognize the rights of Ngai Tahu to participate in public consultation as a corporate citizen and to have its corporate views taken into account in a manner and to a degree commensurate with its prominent status within and its contribution to the Canterbury community. However, in our opinion Māori membership of ECan should be achieved by the democratic election of Māori councillors by Māori voters to whom they are democratically accountable, and not by the appointment of a representative or representatives of a corporate Māori commercial entity, whose voting on a wide variety of issues may potentially be, or at the very least be perceived to be, subject to control, direction or persuasive pressure from that entity and driven to a greater or lesser extent by that entity's commercial interests and agenda, and/or whose participation may be not-infrequently rendered problematic by conflict-of-interest implications.

7 A precedent for democratic Māori representation on a regional council has long existed in the Bay of Plenty, under the [Bay of Plenty Regional Council \(Māori Constituency Empowering\) Act 2001](#). Under this legislation, which resulted from the passage of a local bill, three Māori constituencies were created, as described on the BOP Regional Council's website (see <https://www.boprc.govt.nz/about-council/kaupapa->

[maori/maori-seats/](#)). We wholeheartedly commend this as a possible model for Māori representation on our Regional Council.

8 To recapitulate: we strongly favour having Māori representation on ECan, but equally strongly believe that such representation should be democratically accountable to a Māori electorate, as are Māori MPs, and not to a corporate entity that is in the business of extracting commercial value from the environment as Ngai Tahu is. We believe this to be a view that would be shared by all reasonable Cantabrians of whatever ethnicity, and we are confident that they, like us, will be opposed to any proposals for a future ECan structure that includes Ngai Tahu appointees

### **FRESHWATER MANAGEMENT**

9 We note the complaint about “misinformation circulating about the state of the waterways”. In view of anecdotal evidence such as that cited below, this complaint reminds us of nothing so much as Donald Trump complaining about “Fake News”.

10 We are pleased to see a reference to the existence of “Good Management Practices for Farmers”; but anecdotal evidence (such as the reported case of cattle wandering in Lake Taylor – see <https://www.radionz.co.nz/news/national/294875/cows-in-lake-a-public-relations-disaster>) suggests that good practice prescriptions are useless without policing and enforcement. We demand rigorous monitoring and rigorously enforced compliance, with no turning of blind eyes and with meaningful penalties for infringements – in particular, a punitive approach (long overdue on our view) to dirty dairying, without “education” of rogue farmers being used as a pretext for inaction. We are strongly of the view that this approach should be accompanied by an immediate and permanent stop on any further expansion of dairying in Canterbury; in the long term we consider that a reduction would be highly desirable.

11 In order to protect Canterbury’s aquifers, especially against pollution by seawater incursion, we also demand an immediate moratorium on extraction of water for commercial bottling, at least until a fully elected ECan free of government or other appointees has had an opportunity to re-visit this issue. We have been appalled at ECan’s recently reported permissiveness in this regard.

### **BIODIVERSITY AND BIOSECURITY**

12 We welcome the proposal for a “step change in effort to halt the decline and restore the natural character of degraded indigenous habitats”. The approach to freshwater management outlined in paragraph 10 above should, we suggest, form part of that step change.

13 In particular, we welcome the acknowledgement of the importance of and threat to braided rivers and wetlands. We view the proposal to initiate new programmes for braided rivers and wetlands in year 1 of the LTP as showing a laudable sense of urgency.

### **HAZARDS, RISK AND RESILIENCE**

14 We welcome the proposal to complete the 10-year Waimakariri Flood Protection Programme in the first 3 years of the LTP, and the reference to co-operation with other territorial authorities, in particular Christchurch City Council, with regard to flood-protection-related matters.

### **AIR QUALITY**

15 While welcoming the proposed provision of home loans to support cleaner home heating, we question the emphasis on domestic heating as the main source of atmospheric pollution, and deplore the failure to address the contribution to pollution from motor vehicles, particularly those operated by commercial transport interests. This emphasis is bound to result in householders being made to bear an

undue burden in combating air pollution, with an unacceptable attendant risk of people, especially low-income people, being placed in a position of having to choose between suffering cold and risking a penalty.

## **TRANSPORT AND URBAN DEVELOPMENT**

16 Good working relationships between ECan and other territorial authorities in the region are important across the board, not just in this policy area. We will particularly welcome efforts aimed at promoting closer genuine collaboration between CCC and ECan. In the process of such collaboration, we expect ECan to show respect for Christchurch as containing the bulk of the region's population, contributing the bulk of ECan's rate revenue, and entitled to be considered accordingly.

17 We strongly echo Mayor Dalziel's concern about the proposal to scrap six bus routes – a proposal concealed from the general public by not being included in the summary document put out for public consultation – and the impact this proposal will have, if implemented, on many thousands of residents.

## **IN CONCLUSION**

18 In looking forward to the restoration of democratic regional leadership by ECan, we attach great importance to how that leadership is exercised – hence the prominence given to that matter in this submission. We look forward to a fully democratic ECan, with Māori representation that is democratically elected not corporately appointed. We welcome the LTP's acknowledgement of the importance of good working relationships with other territorial councils in Canterbury

19 Freshwater management is of great concern to us, and we wish ECan to take a vigorous enforcement-based regulatory approach in this area, especially as regards the kind of agricultural excess and pollution facilitated under the post-April-2010 régime. (For example. no future “cows in lake” episodes or the like should go unpunished.)

20 We applaud the concern shown in the plan in relation to biodiversity, in particular the urgent attention to braided rivers and wetlands that is promised.

21 We look forward to ECan engaging constructively with Christchurch and other territorial authorities in respect not only of transport and urban development but also of other matters.

22 Overall, we expect to see a significant general shift away from emphasis on the extraction of commercial value from the environment and towards a greater emphasis on conservation, protection, and environmental rehabilitation.

## **23 We wish to be heard in relation to this submission.**

26 March 2018

On behalf of the Beckenham Neighbourhood Association Incorporated

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