
From: Suky Thompson <suky@peninsulaprojects.co.nz>
Sent: Monday, 26 March 2018 4:27 PM
To: Mailroom Mailbox
Cc: Sue Church
Subject: Friends of Banks Peninsula submission Ecan LTP
Attachments: 2018_03_26 FOBP ECAN LTP form and submission.pdf; 2018_03_26 FOBP ECAN LTP submission.pdf

Hi Ecan

Please find attached a submission to the ECAN LTP from Friends of Banks Peninsula. Our email contact address is friendsbankspeninsula@gmail.com

Suky Thompson
Deputy Chair

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Peninsula Projects
03-304-7733

Long-Term Plan 2018-28

Feedback form

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OFFICE USE ONLY

COMM/PLAN/1828/2

Environment Canterbury is the regional council for this magnificent region. We need your input to ensure our Long-Term Plan will deliver the outcomes the community wants.

The Long-Term Plan 2018-28 outlines the framework for the types of activities we will undertake from July 2018. It also details the measures that we have put against these activities, and the corresponding financial information, policies and strategies.

Feedback closes at 5pm on Monday 26 March, 2018.

You may send your feedback:

By mail (no stamp required): Freepost 1201, Environment Canterbury, PO Box 345, CHRISTCHURCH 8140.

Online: Use the online form provided on our website www.ecan.govt.nz/haveyoursay. Please follow the online instructions provided.

By email: mailroom@ecan.govt.nz. Ensure your full name and address is included.

Use this form to tell us what you think

By providing feedback you agree that Environment Canterbury may use, and may publish, that feedback, including your name and the contact details you provide.

Your name Sally Thompson

Your organisation and role in it (if applicable) Friends of Banks Peninsula, Deputy Chair

Address PO Box 56, Duvauchelle, Banks Peninsula

Postcode _____

Phone number 03 3047733 Mobile number _____

Email friendsbankspenninsula@gmail.com

Signature KSN Date 26/3/18

(If you wish to meet with Councillors to discuss your submission please also complete Q12.)

The work of Environment Canterbury is reported on under six portfolios as outlined in the draft Long-Term Plan document. Our website outlines many of the areas we work in, in more detail. On this form you are asked for feedback on the activity planned under each portfolio as well as on the entire plan and specifically on the Public Transport options. In the comments section under each portfolio, please tell us what you support/don't support about the planned activity, and if there is anything you would like to see more or less of.

Please view our short Consultation Document and full Long-Term Plan supplementary document on www.ecan.govt.nz.

1. Whole Plan

Support/Oppose

Please select one of the following: (please select one answer)

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

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

Comments:

Please see attached
Submission

2. Public Transport Options

Public Transport is one of the programmes in the Transport and Urban Development portfolio. For the first year of the Long-Term Plan 2018-28 we are proposing changes to the Public Transport programme as outlined in the Consultation Document. (on page 14)

To make comment on the Public Transport proposed changes please complete the selection panel below.

To make comment on the the whole Transport and Urban Development portfolio, please go to Q7.

Options

Please review the options in the Consultation Document and indicate which option you support: (please select one answer)

Option 1 – A combination of routes, fares and (targeted) rates changes: small fare and rates increases, reduced Total Mobility subsidy and six routes discontinued. ☐

Option 2 – As Option 1 but larger rates increase, no fare increase: larger (targeted) rates increase, no fare increase, reduced Total Mobility subsidy and six routes discontinued. ☐

Option 3 – As Option 1 but larger fare increase, smaller (targeted) rates increase: minimal rates increase, larger fare increase, reduced Total Mobility subsidy and six routes discontinued. ☐

Option 4 – none of the above. (Please provide comment/ideas for an alternative solution) ☐

Comments:

3. Freshwater Management

See page 6 of the Consultation Document.

Support/Oppose

Please select one of the following: (please select one answer)

I generally agree with the activity proposed for Freshwater Management. ☐

I generally disagree with the activity proposed for Freshwater Management. ☐

Comments:

4. Biodiversity and Biosecurity

See page 8 of the Consultation Document.

Support/Oppose

Please select one of the following: (please select one answer)

I generally agree with the activity proposed for Biodiversity and Biosecurity. ☐

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

Comments:

5. Hazards, Risk and Resilience

See page 10 of the Consultation Document.

Support/Oppose

Please select one of the following: (please select one answer)

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

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

Comments:

6. Air Quality

See page 12 of the Consultation Document.

Support/Oppose

Please select one of the following: (please select one answer)

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

I generally disagree with the activity proposed for Air Quality. ☐

Comments:

7. Transport and Urban Development

See page 13 of the Consultation Document.

Support/Oppose

Please select one of the following: (please select one answer)

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

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

Comments:

8. Regional Leadership

See page 5 of the Consultation Document.

Support/Oppose

Please select one of the following: *(please select one answer)*

I generally agree with the activity proposed for Regional Leadership. ☐

I generally disagree with the activity proposed for Regional Leadership. ☐

Comments:

9. Revenue and Financing Policy

See page 16 of the Consultation Document.

Support/Oppose

Please select one of the following: *(please select one answer)*

I generally agree with the principles outlined in the Revenue and Financing Policy. ☐

I generally disagree with principles outlined in the Revenue and Financing Policy. ☐

Comments:

10. Rates

See page 16 of the Consultation Document.

Support/Oppose

Please select one of the following: *(please select one answer)*

I support the proposed total rates revenue increase of 4.5% for 2018/19. ☐

I do not support the proposed total rates revenue increase of 4.5% for 2018/19. ☐

Comments:

11. Supporting Policies and Strategies

Comments on any other policies or strategies in the full draft Long-Term Plan 2018-28 (see www.ecan.govt.nz).

Comments:

12. Meeting with Councillors to discuss this feedback on the proposed Long-Term Plan

(please select one):

- ☒ I would like to meet with Councillors in Christchurch
- ☐ I would like to meet with Councillors in Timaru
- ☐ I do not wish to meet with Councillors

13. Citizens' Panel

In 2018 we will be setting up a 'citizens' panel'. This will enable us to ask for input during the year from a cross section of the community. If you would be willing to be contacted about being part of the panel, please tick the box and provide your email address. Ticking the box now will not commit you to being on the panel.

Please select one of the following:

I am willing to be contacted. ☐

I do not wish to be contacted. ☐

Please write your email address:

Thank you

Thank you for taking the time to give us your feedback on the draft Long-Term Plan 2018-28.

If you have indicated that you would like to meet with Councillors, please ensure you have given us your contact email and/or phone number. We will be in touch after submissions close on 26 March.

Deliberations take place from 26 March with the final Long-Term Plan 2018-28 being adopted by Council on 21 June 2018.

(If you haven't already please ensure you also have your say on the Long-Term Plan for your local District or City Council).

FRIENDS of Banks Peninsula Inc.

P.O. Box 56, Duvauchelle, Banks Peninsula, Canterbury



Submission to Environment Canterbury Long Term Plan

From: Friends of Banks Peninsula

Contact details: Suky Thompson, Deputy Chair, friendsbankspeninsula@gmail.com,

Postal address: PO Box 56, Duvauchelle, Banks Peninsula

Organisation role: Community Environment Society

Friends of Banks Peninsula has been Akaroa's Community Environment Society for 27 years. The Society has been involved with the issues around Akaroa Wastewater for many years, and was a key participant in the recent consultation carried out by Christchurch City over land-based disposal options.

We are concerned about the amount and quality of wastewater (treated and untreated) entering our environment from Christchurch City Council owned facilities and would like to see Environment Canterbury taking a more hands-on approach to its role in monitoring breaches.

Akaroa Wastewater Monitoring

We were shocked to learn from the City Council that until June 2017 the wastewater flow through the Akaroa treatment plant was measured by a single meter, thereby creating a single point of failure. This only came to light when the Council publicly acknowledged that this flow meter was faulty and the proposed replacement treatment plant that had been granted consented by ECAN and the land based disposal systems it was publicly consulting on were consequently undersized by more than 50%. Equally shocking was the statement from the Council that this meter had not been calibrated since 2009.

The Council has more recently stated in response to the Friends of Banks Peninsula's request for historical data, that the check done in 2009 cannot be considered reliable and they have no idea of when this meter was installed or when the fault might have developed.

The faulty meter has therefore provided the basis of consent compliance on flow levels for the Akaroa Treatment Plant for 10 or more years. We are concerned that ECAN as the compliance authority has:

- a. Allowed a monitoring system for a substantial wastewater treatment plant to be based on flow data from a single meter only
- b. Not required evidence from the Council that this single meter was calibrated and checked on a regular basis
- c. Not cross-checked that the flow readings tallied with the seasonal population trends in Akaroa (it was apparent to us the first time we saw the data that the flow readings in summer were not reflective of the population peak)

Further, we understand from the Christchurch City Council Wastewater Treatment Plant Annual Reports (2011-2016/17) that the Akaroa treatment plant has been regularly breaching consent conditions since 2011: median faecal coliforms have exceeded limits for around a month every summer since 2014; median faecal coliforms in the receiving environment have exceeded trigger levels (typically in summer) every year since 2011; total suspended solids exceeded consent levels for around six months of each of the last two years.

We are unaware that any penalties have been imposed on Christchurch City Council for any of these breaches.

Public Toilets on Banks Peninsula

We were also shocked when work by local residents in French Farm, following on from numerous complaints to the City Council about the smell from the public toilets and the sheer numbers of freedom campers, revealed that the septic tank under those toilets was overflowing into the nearby culvert and straight out to sea.

This was the result of a series of errors by the Christchurch City Council. First it erected a new toilet superstructure on the site of the existing toilet block without checking whether the septic tank below was functioning. The new toilet block included a campervan waste dump. Then as a result of the popularity of the French Farm foreshore with freedom campers due to the toilet block and waste dump, it designated the area as a suitable site for non-self-contained freedom camping in its first Freedom Camping by-law. The result was a horrific overuse of these toilets, with over 100 campers per night using a septic tank system that had received no proper monitoring maintenance.

The Council subsequently closed the toilets and shut down the freedom camping area, but in the meantime, we estimate 800,000l of raw sewage had entered Akaroa harbour. This estimate is based on the water meter supplying the toilets during the period when freedom camping was taking place there. Again, we question what sort of compliance monitoring ECAN has been doing to:

- a. Allow a public toilet block to be upgraded including a campervan waste disposal onto an existing, old and very limited capacity septic tank
- b. Fail to test the effluent flows from public toilets where there is a rapidly escalating use.

Since then the Council has engaged Beca to produce an assessment of public toilets on Banks Peninsula¹. This indicates that the French Farm toilets are not an isolated case. A similar situation exists at Le Bons Bay where a new toilet block has been built over an old septic tank (and in this case had the stormwater from the building directed into it) and there are failing public toilets at Wainui, Le Bons Bay, Little Akaloa and Stoddart Point. The Beca report estimates the capacity of these septic tanks systems as:

- French Farm 23 people per day
- Wainui 19 people per day
- Le Bons Bay Little Akaloa 10 people per day
- Stoddart Point 29 people per day
- Wainui 19 people per day

The report has advised the Council that industry best practice is that such septic tanks should not be emptied more than once every 3 years to allow anaerobic micro-organisms that drive the biodegradation time to establish in the sludge zones, and that the quality of treatment can be compromised if a septic tank is frequently pumped out.

We are now aware that the Council has reopened several of the closed toilets, including at French Farm and Stoddart Point on the basis that they will be pumped six monthly.

Redress requested

The Friends of Banks Peninsula request that ECAN step up the level of compliance monitoring that it is doing of the Christchurch City Council wastewater systems and public toilets on Banks Peninsula. We do not consider that ECAN is carrying out its monitoring and compliance functions adequately by relying solely on the reporting done by the City Council, because this has clearly lead to a substantial number of serious breaches going undetected.

We are particularly concerned that, if some form of land-based wastewater disposal is adopted for Akaroa's wastewater, we would currently have no confidence that the quality of the water being discharged is safe.

¹ Beca, "Banks Peninsula Public Toilets Assessment Report". Prepared for Christchurch City Council June 2017

Further we note that the Christchurch City Council LTP states that it has prioritised other matters over wastewater work and expects to experience more network overflows as a result. This on top of the level of compliance failure is not acceptable and we expect ECAN to step up and monitor wastewater to ensure that consent conditions are met.

We wish to be heard in Christchurch in support of our submission

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