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**From:** Sophie Allen <sophie.earthwater@gmail.com>  
**Sent:** Monday, 26 March 2018 4:39 PM  
**To:** Mailroom Mailbox  
**Subject:** LTP Submission  
**Attachments:** Submission Sophie Allen LTP Plan 2018.pdf

Dear ECan,

Please find my submission as an individual attached.

Sophie Allen  
1 Cargill PI, Richmond, Christchurch 8013

I do wish to be heard at the hearing.

Cheers,

Sophie

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# Submission on the Environment Canterbury Long Term Plan 2018-2028

March 2018

Submission by Sophie Allen – Individual

## General comments:

1. I am the projects manager for Working Waters Trust, and the Implementation Manager for the Christchurch Enviro Hub. However, this submission is on a personal basis.
2. I **recommend** the establishment of an open contestable 'community environment fund'. This will be available to Not-For-Profit entities, to undertake environmental work that fits within all portfolios of Environment Canterbury, for example Biodiversity and Biosecurity, Freshwater Management, and Climate Change. There should be no required co-funding threshold as a criterium to apply, as required co-funding is often a barrier to initiating projects for Not-For-Profit organisations. Funding for all projects, not exclusively for on-the-ground physical works, should be eligible. The fund should allow funding for resource consent applications and their preparation, as well as expert technical support where required.

## Stategic Priorities:

3. I **support** the elevation of 'Freshwater Management' and 'Indegenious Biodiversity' as strategic priorities of Environment Canterbury work within the next 10 years. These are areas where I agree there should be a step-change, due to the significant issues that need to be tackled, and feasibility for greater outcomes.

## Regional Leadership:

4. I **recommend** more resourcing for compliance activities, particularly to be able to carry out 'shot checks' on a sample of rural landowners who carry out Permitted activities under the Land and Water Regional Plan, to assess any general issues with compliance, with follow through consequences for any gross breaches.

## Biodiversity and Biosecurity :

5. I **recommend** the continuance of 'Networking for the Environment' events– an initiative facilitated by Environment Canterbury.
6. I **propose** targeted resources and funding for the Ōtākaro Avon River Corridor (Residential Red Zone) for bioersity restoration (and freshwater management) within this area upon commencement of the implementation of the master planning by Regenerate Christchurch.
7. I **recommend** more resourcing within Environment Canterbury for marine biodiversity work.
8. I **support with some reservations**, the extention of the Predator Free 2050 initiative to the Port Hills. I support the increased funding base that this will supply, however recommend the feasibility of the initiative (i.e. to prevent re-invasions to the Port Hills) to be examined and found economical before commencement.

#### **Freshwater Management:**

9. I **support** the focus areas of wetlands and braided rivers. In addition I **recommend** an additional focus area of protection of at-risk lowland streams/water races with currently high biodiversity values. These values could be the presence of kekewai (freshwater crayfish), Canterbury mudfish, or whitebait species for example.
10. I **support with conditions** the appointment of additional Cultural Land Management Advisors, i.e. particularly if the roles are able to work with not-for-profit/ community organisations to provide localised cultural advice, not just supporting landowners on-farm.

#### **Hazards, Risk and Resilience:**

11. I **support and recommend** strengthening of the Climate Change integration programme, for example to include assessment of Canterbury-wide greenhouse gas emissions (if the required data is not already available from central government agencies), and a Climate Change Strategy for **mitigation** and adaptation under the Local Government Act. Environment Canterbury should be taking a more proactive approach to reducing its own carbon footprint as an organisation.

12. I **recommend** Environment Canterbury to develop the Climate Change programme further into a Climate Change portfolio alongside its other five major portfolios.
13. I **challenge** the assumption that “the Government’s stance on the statutory role for regional councils for climate change will remain as ‘adaptation’ to the effects of climate change, and not ‘mitigation’ of greenhouse gas emissions” given the implementation of a Zero Carbon Bill is underway. This legislation is likely to have implications for regional councils across the country. For example as the entity responsible for delivering public transport services in Canterbury, ECan would be required to contribute towards the reduction of transport-related greenhouse gas emissions.

#### **Public Transport:**

14. I **do not support** any of the given options on the basis that all three include a reduction in the Total Mobility subsidy and the removal of six bus routes, and therefore do not actually present a genuine choice.
15. I **recommend** an evaluation of why the six lowest routes are low performing, before a decision to discontinue the lines. There could be possibilities to modify the routes e.g. the West Morland bus service could go to the bus exchange, rather than Eastgate- as it is the only bus service to serve West Morland. In general, I do **not support** the discontinuation of the six lowest performing bus routes and the increase in bus fares. I ask Environment Canterbury to re-evaluate the farebox recovery policy (particularly in light of the current Government’s more favourable stance towards public transport) and to start recognising public transport as an investment with numerous social benefits and long-term economic benefits, not to mention a crucial part of reducing transport-related carbon emissions.
16. I **reject** the proposed reduction to the maximum Total Mobility subsidy per vehicle trip from \$35 to \$30. Services for those with disabilities should not be cut unless viable alternatives are offered and until public transport is made more accessible to all.

#### **Revenue and Financing Policy:**

17. I **support** the proposed rates rises of 4.5% for the next few years. To fund initiatives proposed in this submission, rates could be increased slightly, with a cap at 5%.

18. I **support** both the proposed level of debt borrowing as it is below the quantified limit of 175% of total rates revenue, and the reduction in expected level of debt by 2027/28.