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**From:** Frances Wall <francesmwall@gmail.com>  
**Sent:** Monday, 26 March 2018 4:46 PM  
**To:** Mailroom Mailbox  
**Subject:** Submission on LTP 2018-28  
**Attachments:** Branch submission ECan LTP 2018-28.docx

Attached please find North Canterbury Branch Forest and Bird's submission on the Long-Term Plan (2018-28)

Thankyou  
Frances Wall (Branch Secretary)

**Submission on ECan LTP 2018-28**  
**North Canterbury branch**  
**Royal Forest and Bird Protection Society of NZ Inc**

Frances Wall  
Secretary, North Canterbury Branch Royal Forest & Bird Society  
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This is a submission on behalf of the North Canterbury branch of Forest and Bird on ECan's LTP 2018-28. North Canterbury is one of the largest Forest and Bird branches in the country with over 3000 members. Our members are deeply concerned about the state of the environment and conservation in Canterbury and are particularly concerned about the lack of clear data on environmental targets and sufficient monitoring, compliance and enforcement.

We support any policy which enhances, conserves and protects the flora and fauna of Canterbury and its biodiversity, which is under intense pressure for development.

However, the branch is encouraged, with some qualifications, by the strategic priorities in this LTP as regards in particular freshwater management and indigenous biodiversity.

**Freshwater Management**

1. **Support** the general focus of this section to provide clearer, easier to access information. We are particularly concerned that accurate data be supplied to substantiate progress in freshwater management. Some of the target reporting in the past has been far too vague to make an informed judgement and raises serious PR problems with our members and we believe the wider community.
2. **Support** linking freshwater management to biodiversity enhancement.
3. **Support** the approach of community working together at catchment level through zone committees, but concerned that ZCs do not always have balanced community representation, that farming and irrigation interests are over represented to the disadvantage of residents and others.
4. **Support** greater focus on implementation of freshwater plans and policies in the next decade.
5. **Strongly support** the review of historic water consents, particularly in over allocated areas of water extraction. This is urgent. Consent takes must align with minimum river levels as laid out in sub-regional plans, otherwise the process of freshwater management is undermined. The flows that are required for ecological health must be set using robust research not negotiation.

6. **Strongly support** enhanced monitoring and data collection in relation to resource use and state of environment reporting. Ratepayers and our members need a clearer idea of what is working and what is not.
7. **Support** increased funding for monitoring, compliance and enforcement of freshwater issues.
8. **Oppose** the move away from a targeted rate for the CWMS. Those who use the 'free' water resource should bear the bulk of the management costs. This cost should not be transferred to general rates as proposed, but more focused on water users.
9. **Oppose** spend of 10% on CWMS facilitation. This should be reduced. The funding difference should be used to enhance compliance and monitoring functions.
10. **Support contestable** funding for individuals or groups working on biodiversity issues.

### **Biodiversity and Biosecurity**

**Strongly support** extra effort directed to enhancing and protecting existing indigenous biodiversity. Canterbury is the most heavily modified landscape in New Zealand and much of the Canterbury Plains can be seen as an increasingly 'boring green desert'. Overseas visitors have often commented on the extremely desolate appearance of the Plains in areas like Thompson's Track.

This situation has worsened since the development of extensive irrigation with the removal of thousands of trees and hedgerows, most of them exotic. Industrialisation of the landscape under intensive dairying, has had a negative impact on habitat for wildlife on the plains, on the birds, insects, lizards and other flora and fauna. Sadly it is not really clear as to the extent of these deleterious effects, but they are certainly ongoing.

**Support a significant and sustained** push for the **protection** of still existing first and foremost but also the **restoration** of lost native flora/fauna both on and off farm and careful application of ECan's Biodiversity Strategy.

Thousands of hectares of empty land on wide verges alongside rural roads could be planted as indigenous biodiversity corridors instead of being mown at ratepayer expense. There are also significant on-farm sites, such as corners of paddocks or along fence lines, which could be planted with native species to encourage birdlife. **We support any moves in this direction.** ECan and district councils need to work much more proactively in this regard; there is much that could be done.

We urge the use of ECan lands on which to restore biodiversity values and to model what can and should be happening to others, including the city and

district councils and LINZ. We refer you to work being done on the riparian area of the Waimakariri near Coutts Island led by an ECan Parks and Reserves staff member. We know you are working in other areas as well and encourage you to do more of that work. It is relatively low cost particularly when it involves partnering with other groups like North Canterbury Forest & Bird.

We **support** more consideration being given to strategic planting so that critical indigenous biomass can be developed and genuine biodiversity corridors created. At present action appears too 'scattergun' in approach? This requires 'joined up thinking' i.e. communication and cooperation amongst agencies and community groups/NGOs.

**Strongly support** the new programme for braided rivers and wetlands, although expenditure in this area at just 8% seems rather low? We have capacity in Christchurch to restore space into wetland and we urge you to consider ways ECan can actively support this.

While supporting this focus on braided rivers and wetlands we believe attention must be paid to marine biodiversity and a small increase in funding commitment to this would make a significant difference to ECan's capacity.

**Support** Banks Peninsula and Port Hills Initiative programme.

There are some shifts in the way biodiversity funds are delivered that would help our sector to engage with quality conservation work and support our skilled people working in this field. We cannot continue the over-reliance on volunteerism and ECan could help within Immediate Steps as follows.

1. Under the current Immediate Steps funding structure it is often very difficult for charitable organisations to provide the required 1/3 co-funding or in-kind donation to get projects off the ground, particularly if the landowner is unable to contribute financially / the landowner is the Crown. For NFP organisations the co-funding requirement should be waived, as there is no personal gain to anyone within the NFP organisation from the funding.
2. Project management costs should be higher than the current maximum of 15% of the total project (which is usually provided in-kind by the NFP organisation anyway), and allow for funding of required skills such as from a suitably-trained person e.g. freshwater ecologist for more technical projects.
3. Some resource consent fees (e.g. for earthworks or protective fish barrier installation) should be able to be covered by Immediate Steps funding, when not already required by the landowner under current regulations;
4. The time/support needed to prepare the funding applications should be able to be covered by Immediate Steps funding.

We note that in the recently developed Regional Pest Management Strategy Russell lupins are listed as a target species. We draw your attention to a developing community effort to work on this problem in the Upper

Waimakariri catchment including Arthur's Pass later in 2018 involving North Canterbury Forest & Bird and others and urge you to help this effort.

Weeds in general are concerning many of our members. While the success of the wilding pine eradication effort in the upper Waimakariri basin is to be applauded and we SUPPORT maintaining the Wilding Pines Control programme the encroachment of a wide range of other weed species into the area is very worrying. When discussing the challenges to biodiversity in any area of high conservation value the incursion of weed species is talked about as being of paramount concern. We must increase our effort in this area substantially.

Finally a word about the next generation - developing young citizens with the knowledge and awareness to protect our environment and biodiversity into the future. Within Forest & Bird we refer to it as our goal of 'developing young conservationists'. We have a Kiwi Conservation Club (KCC) which seeks to do this. However, we are concerned that schools are not getting enough educational input from ECan. There is unmet need and while community groups like North Canterbury Forest & Bird try to follow through with requests from schools this is another area where the reliance on volunteers is both unfair and probably less than optimal in terms of what is being delivered. You have excellent youth engagement staff but we ask you to look at your capacity in this area and think about extending it.

### **Hazards, Risks and Resilience**

Many members are concerned at what has appeared to be a somewhat hesitant approach from ECan in the realm of climate change. All the biodiversity work we all do will be of little value if we cannot mitigate against climate impacts to the best of all of our abilities. ECan can not afford to be lagging in this. Realistically mitigation and adaptation are a continuum.

Having said this we do note the statement about "a climate change integration programme..." That is hopefully a sign of improvement from ECan.

### **Transport and Urban Development**

**Strongly support** ECan's role in maintaining and enhancing public transport in the region, including rail. Climate change mitigation must be one of the LTPs strategic priorities and public transport is an important factor in this regard. Disappointed that ECan appears to have been been unsupportive towards investigating and promoting rail commuter options north of the city.

Fares should be kept down, not raised by 7.5% over three years, if the public are going to be encouraged to use buses rather than cars. Thousands of bus users are on low or fixed incomes and any fare increases

are a major disincentive and bad marketing. There should also be a student concession, as in many other cities around the world.

A shortfall of \$4m is hardly significant in ECan's total budget. It is counter productive and undermines current patronage implementing fare increases because of this small deficit.

### **Revenue and Financing Policy**

**Support** the proposals for funding pest management.

**Generally support** rating approach for Freshwater Management. However we are concerned there is no detail on the rural/urban split in the \$31.2m funding for this portfolio. Why has this not been detailed?

Funding for this activity should be directed to the agricultural and commercial sectors which have the greatest responsibility and the largest consumption by far, and not to residential users of freshwater.

We do wish to be heard.

26<sup>th</sup> March 2018