

**From:** Annette Hamblett <ahamblett@xtra.co.nz>  
**Sent:** Wednesday, 4 April 2018 4:59 p.m.  
**To:** Mailroom Mailbox  
**Subject:** Fw: LTP submission  
**Attachments:** Environment Canterbury Long-term Plan 2018-28 submission.docx

Hi

When we sent this through we forgot to say we wanted to speak to it.

Can you pass this on please – if it's not too late.

Thanks.

Annette Hamblett

**From:** [Annette Hamblett](#)  
**Sent:** Monday, March 26, 2018 4:49 PM  
**To:** [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)  
**Subject:** LTP submission

Submission from:

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

**From:** Annette and Michael Hamblett

### **General comments**

#### Purpose statement for ECan

The purpose statement in the plan, 'Facilitating sustainable development for the Canterbury region: Te huawaere i te kaunake tauwhiro i Waitaha', in our view is not fit for purpose in the 21<sup>st</sup> century. The Council is called Environment Canterbury. The environment should be at the heart of its purpose. The phrase from the Local Government Act 2002 regarding regional council's responsibilities, 'Sustainable regional well-being', along with wording to reflect the need to ensure we care for our natural resources and environment for the long term, would be much more appropriate.

#### **Action sought:**

Review ECan's purpose statement to highlight sustainable regional well-being in tandem with care for the natural environment and natural resources for the long term.

We want to see a more joint approach to ECan's work, with ECan working with the Territorial Authorities and Christchurch City Council, the Department of Conservation and relevant community groups with shared aims.

#### **Action sought:**

ECan takes a joint approach with other authorities, organisations and groups across its work to enhance information exchange, efficiency and effectiveness, and the get the best 'bangs per buck' across our region.

### **Freshwater Management**

#### Regional Water Infrastructure Support

We are pleased to note freshwater management is a priority if this means determined action to halt the decline of water degradation, ensuring continual improvements in water quality and bringing water takes under control, to ensure Canterbury's freshwater has a good outcome for the future.

We support providing clearer, easier to access information on the state of our water and the issues associated with it. We need accurate and clear data to know if targets in the plans are being met.

We support the integration of freshwater and biodiversity work as common sense and efficient. It is needed across all points of commonality, not just braided rivers.

#### **Action sought:**

Support above actions.

#### CWMS (Canterbury Water Management Strategy) Facilitation

We do not support the budget increases for 2018/19 of \$150,000 and another \$50,000 in 2019/20 to 'cover costs associated with the CWMS refresh work'. This phrase tells us nothing about what the money will be spent on.

We note that 10% of portfolio expenditure goes to CWMS facilitation while 19% goes to environmental monitoring and progress reporting. The facilitation percentage needs to decrease and the monitoring and reporting percentage needs to increase.

We are opposed to any removal of a targeted rate for the CWMS. All commercial users of our public water resource should be specifically rated to bear the bulk of management costs. This cost should not be transferred to general rates as proposed. Other ratepayers already bear the costs of degradation of water through commercial use and the loss of water from waterways as a result of water takes.

Intergenerational ecological debt needs addressing via the CWMS. We have been alerted recently to the issue of nitrates in the Waimakariri area affecting Christchurch's water in the next 50 to 100-year period. We note that the CWMS targets related to environmental/economic externalities such as the cost of treating drinking water, health costs and loss of recreational values, have been virtually neglected. We want to see real improvement both on working on these targets and measuring their progress.

**Action sought:**

Do not support proposed budget increases.

Maintain targeted rate for CWMS and do not transfer to general rates.

Address intergenerational ecological debt through working on targets related to environmental/economic externalities.

Environmental Monitoring and Progress Reporting

We support additional funds being allocated for field costs and an additional role to boost the periphyton monitoring programme.

We support resources being reprioritised to enable the equivalent of one full-time position to monitor river flows connected to irrigation takes.

**Action sought:**

Support above measures.

Resource Management Act Water Framework

We support conducting catchment-wide consent reviews after ECan has formalised catchment plans in sub-regional plans. It is sensible to call in all consents at this time and fully review them rather than staggering implementation of the plan by waiting for review dates to come up.

In addition, we want to see all consents called in for review in all over-allocated areas.

**Action sought:**

Support catchment-wide consent reviews as above.

Call in all consents for review in all over-allocated areas.

Biodiversity and Biosecurity

We support the step-change in effort with the regeneration of freshwater, marine and terrestrial biodiversity.

We support indigenous biodiversity being one of the two strategic priorities. We note there is scant reference to ECan's Biodiversity Strategy. We note biodiversity is still a small part of the budget and deserves more funding.

We support what ECan's Biodiversity Strategy states, 'Focus first on protecting and maintaining what remains, and then on restoring what has been lost'. Given this statement and the fact that it is very expensive to restore biodiversity compared with protecting it, the emphasis in ECan's biodiversity work needs to be on protecting the indigenous biodiversity that is left and thereby halting further

decline. The Council could consider what incentives could be put in place to ensure protection of what's left.

We support collaboration between all the organisations who are working on biodiversity projects.

We would also like to see support in the form of funding available for groups working on biodiversity issues (including groups focussed on freshwater such as the Working Waters Trust)) to apply for. Our understanding is that currently only some groups are supported, often for the longer term (like Banks Peninsula Conservation Trust). There is not currently a contestable annual fund for other groups. CWMS next steps money goes only to landowners. Why can't some of this be made available to appropriate groups doing positive hands-on biodiversity work? We note Otago Regional Council has much more funding available for these groups.

We support expansion of the Banks Peninsula Community Initiative Programme to include all properties, cover a greater geographic area and include a wider range of pests as a step towards a pest-free Banks Peninsula.

We would like to see Banks Peninsula (including the Port Hills) established as an ecological zone. This is likely to be a more effective way of dealing with pests such as goats, deer and weeds.

We support pest rates being levied for targeted areas such as these. We would like to see the Port Hills included next year – why does this need to be delayed?

We want to see a more joint approach to this work, with ECan working with the Territorial Authorities and Christchurch City Council, the Department of Conservation, LINZ and relevant community groups with shared aims. For example, there needs to be collaboration between CCC/ECan/DOC re conservation, storm water, vegetating gullies, riparian plantings, to improve estuary health.

We support maintaining areas cleared of wild conifers.

We support the programme to maintain and enhance the natural character of braided rivers and the combined approach but note that many of the most degraded waterways needing urgent attention are not major rivers. They need action plans too.

We support the development and implementation of wetland action plans to protect and enhance wetlands, particularly those on private land, so long as they are definite improvement plans and not 'landscaping' projects.

**Action sought:**

Support all above comments.

Note:

Use ECan's Biodiversity Strategy.

Provide increased funding for biodiversity

Focus first on protecting biodiversity that's left.

Establish Banks Peninsula (including Port Hills) as an ecological zone.

Implement pests rate levy next year.

Take a joint approach with other authorities, organisations and groups.

Provide a pool of funding to be available for groups working on biodiversity issues) to apply for annually.

## **Hazards, Risks and Resilience**

We support the new Climate Change Integration programme, but it needs more resourcing.

We view it as short-sighted that the Council assumes the role for regional councils for climate change will remain as 'adaptation' to the effects of climate change, and not 'mitigation' of greenhouse gas emissions.

We were taken aback to realise that ECan does not yet have 'a process to ensure that climate change is robustly factored in to relevant Council decisions across portfolios'. The Ministry for the Environment published, 'Preparing for climate change: A guide for local government in New Zealand' in July, 2008. It states: 'Local government is required to operate under a range of principles that are set out in law or have evolved through good practice and case law. All must be kept in mind when dealing with climate change effects. The key principles are:

- sustainability
- consideration of the foreseeable needs of future generations
- avoidance, remedy or mitigation of adverse effects
- adoption of a precautionary / cautious approach
- the ethic of stewardship / kaitiakitanga
- consultation and participation
- financial responsibility
- liability.'

Climate change policy from Central Government will include regional councils' responsibilities. The Zero Carbon Bill is underway and it is likely to have implications for regional councils. One example in the delivery of public transport services in Canterbury, ECan would be required to contribute towards the reduction of transport-related greenhouse gas emissions. To be prepared for legislation like this, ECan's climate change work needs a lot more resourcing. It must also include a focus on long-term mitigation goals. Adequate resourcing is urgent to catch up on where it should already be.

ECan should take the lead, not just educate on climate change. If there is not already data available, ECan should lead in setting up a Canterbury emissions inventory across the region that Territorial Authorities and the ChCh City Council join in on. We can then know what our Canterbury local government baseline emissions are and better target emissions reductions. ECan should be taking a much more proactive approach to reducing its own carbon footprint.

Given the importance of climate change effects, we ask ECan to develop this programme into a climate change portfolio alongside its other five major portfolios. Climate change needs to be considered across all ECan's work and budget decisions. This is one area where a rates increase could be considered.

Groups working on climate change should be supported. There could be a fund set up groups could apply to.

We noted and appreciated the Council's 2016 opposition to deep-sea drilling off the Canterbury coast.

### **Action sought:**

Provide more resourcing to the Climate Change Integration programme.

Develop this programme into a climate change portfolio alongside the other five major portfolios.

ECan takes the lead on setting up a Canterbury emissions inventory.

Move on to mitigation of climate change effects.

## **Transport and Urban Development**

### Public transport

Cutting public transport is counterintuitive in times when we need to be encouraging its use. We are concerned to note that six poorly performing bus routes will be discontinued and bus fares will be increased. We are also concerned about the reduction in the Total Mobility subsidy. These actions will not encourage more people to use public transport. Such a step should take the public along with it. We need more information on usage data, projections of future use and the effects of fare increases so that we can make an informed submission.

The current government is more supportive of public transport. We all need to be if we are to reduce transport-carbon emissions.

We support shifting freight where possible from road to rail and coastal shipping, as road freight creates significantly greater environmental and social impacts than these alternative modes, including traffic congestion, crashes, reduced air quality, greenhouse gas emissions and degradation of local roads.

We do not support any of the options given. A rethink is needed.

### **Action sought:**

Maintain bus routes and Total Mobility subsidy.

Provide more information on usage data, projections of future use and the effects of fare increases so that we can make an informed submission on public transport.

Support shifting freight where possible from road to rail and coastal shipping.

### **Air Quality**

We support the Healthier Homes Canterbury loan scheme initiative.

### **Action sought:**

Support the initiative.

### **Regional Leadership**

#### Plans, consenting and compliance:

We are supportive of an increased focus on monitoring-technology and collection of real-time data against consents, increased use of field and desktop monitoring, and improved data systems to support the compliance work.

We would like to see more resources allocated to monitoring of permitted activities as we understand high risk activities are the focus at present. We would also like to see random monitoring of compliance and enforcement.

We support better monitoring and enforcement of the regulations already in place.

### **Action sought:**

Support above points.

Allocate more resources to the monitoring of permitted activities, not just 'at risk' activities.

Carry out random monitoring of compliance and carry out enforcement.

Better monitor and enforce the regulations already in place.