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**From:** Nicky Snoyink <nickysnoyink@xtra.co.nz>  
**Sent:** Monday, 26 March 2018 5:01 PM  
**To:** Mailroom Mailbox  
**Subject:** LTP SUBMISSION  
**Attachments:** ECan LTP Submission.pdf

Please find attached my submission on the ECan Long Term Plan.

Kind regards,  
Nicky Snoyink

## ECan LTP Submission

Thank you for the opportunity to submit on the ECan Long Term Plan (LTP).

### 1. Comment on LTP consultation document introduction

The opening paragraph of the LTP consultation document states that in Canterbury “water is plentiful” and that “we are one of the few places in the world where there is an abundance of freshwater”. Given the declining state in quality and quantity of Canterbury’s drinking water and freshwater ecosystems, these statements are misleading. Such statements do little to promote a change in the way water is valued, used and protected.

A more realistic introductory paragraph would have acknowledged the decline and emphasised the need for a new paradigm in the way water is used and managed in Canterbury. Such an opening statement could have also been used as a way to reinforce the need for immediate catchment based water consent reviews, sending a clear message that a new approach to water management is imminent.

The second part of the opening statement reveals that “as the regional council for Canterbury, we are responsible for facilitating sustainable development in the region”. Sustainable development is untenable. The cumulative effect of continued development results in loss and is therefore unsustainable. A more appropriate purpose for Environment Canterbury would be to promote environmental, social and economic prosperity in Canterbury.

I commend ECan for making freshwater management and indigenous biodiversity top strategic priorities and for tackling the gnarly issue of climate change resilience. These strategic priorities have my full support. Their management is inherently connected and they are the basis of my submission.

### 2. Freshwater Management

I concur that freshwater is probably the most contentious and complicated issue the region faces. However I believe that is because in recent years, much emphasis has been placed on the economic benefits of water use through the promotion of irrigation and the resultant intensification of land use; to the detriment of ecosystem health, protection of drinking water sources and recreational values and the subsequent costs the wider community has since borne. We now face the issue of clawing back community values and internalising the externalities that have arisen from the current approach. This will not be easy for some water users in Canterbury but it is better to start now than to delay.

#### (i) Relationships with other agencies

I support improving relationships with other agencies to co-ordinate efforts for freshwater management. Joined up thinking between agencies with a common vision to improve ecosystem health and natural character of waterways, improve protection of drinking water sources and retain (and in some cases reinstate) recreational values will result in better outcomes for freshwater in Canterbury. The current approach of working in isolation has hindered alignment and constrained opportunities for greater prosperity.

#### (ii) The CWMS and collaboration

The CWMS collaborative approach in the form of Zone Committees has been unsuccessful in understanding and achieving community outcomes for freshwater. Once sub regional plans have

been completed, I do not support the continuation of zone committees. The collaborative approach used to set environmental limits has undermined your organisations public credibility and created an uneven playing field.

Alternatively, implementation of the CWMS may be better achieved by investing in staff to monitor permitted activities and to enforce compliance, to adequately assess RMA consent applications, to assess biodiversity project proposals and to report on environmental target progress.

I support greater resourcing for technical advice from ECan staff and for communication with other Government agencies including public health organisations, and NGO's, to establish methods for achieving CWMS targets.

I support the resourcing of Cultural Land Management advisors to increase awareness of mahinga kai, wahi taonga, kaitiakitanga targets and other Treaty of Waitangi obligations.

Furthermore, I support the use of the RMA Schedule One plan making process and rights of appeal to the Environment Court. However, I am aware that this a process beyond ECan's control and one that is a matter for Central Government to resolve in the near future.

(iii) Limit setting and consent reviews

I support the setting of healthy ecological flows for all rivers. I support an immediate review of all water consents (not just the Ashburton River/ Hakatere) to achieve desired environmental outcomes. I also support increased monitoring of and compliance and enforcement of consent conditions, to achieve a fundamental change in how water is valued by users.

3. Biodiversity and Biosecurity

I commend ECan on bringing about a step change in effort to halt the decline in and restore the natural character of degraded indigenous habitats and ecosystems. This is long overdue.

(i) The CRPS

The Canterbury Regional Policy Statement's (CRPS) first objective, Objective 9.2.1 reads "Halting the decline of Canterbury's ecosystems and indigenous biodiversity. The decline in the quality and quantity of Canterbury's ecosystems and indigenous biodiversity is halted and their life-supporting capacity and mauri safeguarded." The CRPS states "Halting the current decline in biodiversity will only be achieved by adopting an integrated and coordinated management approach. Such an approach will recognise that Canterbury's ecosystems and indigenous biodiversity must be managed within and across catchments so that the interconnectivity of species and habitats is provided for. The Ngāi Tahu philosophy of Ki Uta Ki Tai (from the mountains to the sea) will be an integral feature of this process." Clearly ECan's own Regional Policy Statement prioritises halting the loss of indigenous biodiversity so a commitment to step change toward implementing this is promising.

(ii) Land owner support

Gaining landowner support is integral in protecting remaining indigenous biodiversity. Therefore I support any initiative, including both carrot and stick approaches to maintaining indigenous biodiversity.

(iii) A coordinated approach

Like water management, I support a co-ordinated approach with other agencies responsible for halting the decline of Canterbury's ecosystems and indigenous biodiversity, maintaining indigenous

biodiversity and the conservation of natural and historic resources generally. Restoration is expensive therefore protecting what remains of indigenous habitat “in situ” is the most cost effective way of halting the loss. Braided river ecosystems from their mountain sources to the sea are among the most important remaining natural habitats, especially where they cross the Canterbury Plains, Canterbury’s inland basins which retain large areas of intact naturally occurring vegetation from the mountain tops to the valley floor, wetlands and the coastal marine area, are among the most important remaining natural ecosystems containing indigenous biodiversity.

The Braided Rivers Action Group (BRAG) is a good example of a co-ordinated agency approach. I support increased resourcing of BRAG, provided that it demonstrates progress toward joined up thinking aimed at halting the loss of riverbed habitat including methods for dealing with both legal and illegal encroachment, agrees on a collective vision towards phasing out inappropriate activities in river beds and what is considered appropriate use of river bed land and its members put this into action through respective statutory duties.

Integrating indigenous biodiversity resources into Farm Environment Plans would also be a useful addition to Good Management Practice.

I support increasing the resourcing of all efforts to halt the decline of natural ecosystems and to integrate maintenance and protection of indigenous biodiversity into current and future land use and water activities.

#### 4. Climate Change Resilience

Healthy ecosystems and freshwater habitats, thriving indigenous biodiversity and appropriate development in the right places, will contribute to ensuring Canterbury communities are prepared for the effects of climate change. With the threat of sea level rise the coastal area is the most vulnerable to the effects of climate change. This area will require the most immediate attention to ensure coastal communities are adequately prepared.

The protection of the natural environment is inherent to preparing and protecting communities for the effects of climate change. If braided river systems are free to meander across their great beds, there is natural flood mitigation; intact forests and wetlands provide for flood mitigation and natural filtration; sand dunes and estuaries provide natural barriers; maintaining areas of indigenous terrestrial biodiversity provides for the protection of soil and prevention of desertification; avoiding construction in high hazard areas like flood plains, mountain environments and coastal areas reduces loss.

I support any initiative that ECan that it proposes in its climate change portfolio. Climate change is the greatest threat of our time.

Thank you very much for the opportunity to submit.

Nicky Snoyink

Springfield