

Make Submission

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Event Name	Long-Term Plan 2018-28 Consultation
Submission by	Ms Marilyn Yurjevich (77670)
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Whole Plan Support/Oppose	
Please select one of the following:	I generally agree with the activity proposed for the Long-Term Plan.

Whole Plan Comments

Please provide any comments.

GREENING THE RED ZONE SUBMISSION

ENVIRONMENT CANTERBURY LONG-TERM PLAN 2018-2028

Thank you for the opportunity to submit on ECan's Long Term Plan. This submission addresses issues that are of concern to Greening the Red Zone Inc (GtRZ).

Overall, we congratulate ECan on a vision that endeavours to take Canterbury into a future of environmental health. However, we have concerns regarding implementation, monitoring and enforcement of key ecological indicators, particularly water quality, biodiversity and climate change. We request that ECan take a stronger approach to **innovative collaborations with other organisations** that link with ECan's objectives, including the Callaghan Institute, which is researching ways of reducing nitrate seepage, and the dozen or so centers of higher learning in the region.. This may require a small increase in ECan's rates but will be worth the expense compared to potential higher costs later.

We are pleased that freshwater management is a priority concern for ECan. However, GtRZ is concerned that the issue of nitrates from farming activities has not been addressed sufficiently as a very long-term issue. It is an **intergenerational risk that needs to be addressed now**, as the nitrates will eventually pollute Christchurch's water supply, including water in the Residential Red Zone (RRZ), potentially affecting the health of the Ōtākaro-Avon as well as Christchurch citizens.

Linked to this is ECan's respoNsibility for monitor farming activities. However, we note that there are insufficient monitoring resources, and funding for such, to make positive inroads into reducing nitrate

pollution by farming activities. We note that of the 8,800 farms in ECan's area of responsibility, 2,000 are high risk but the other farms' activities are permitted. Accordingly we submit that **more resources be allocated to employing more monitoring staff and that ECan takes a firmer approach to encouragement, and where necessary enforcement, of policies.**

Associated with water quality, we are alarmed that consents have been given for removing huge quantities of water for sale. This could reduce the quality and quantity of water flowing into our own water resources. To this end, we submit that **ECan and the Christchurch City Council lobby Government to tighten the Resource Management Act and the Local Government Act** to prevent such abstraction of free public resources for private gain.

Biodiversity is a defining ecological quality of a region and place. ECan has a **Biodiversity Strategy** (to fulfill its national and international obligations) that we submit **needs to be more urgently enforced.** ECan's timid approach has not protected many of the last remaining fragments of primary habitat on the Plains. What is left now (based on the knowledge of experts and past inventories) needs to be given the highest priority for protection by whatever means available, including publicity that any attempts to eliminate such habitat will be treated very seriously. The next most crucial action for ECan is to deal with the massive biosecurity risks in the Region – not just wilding conifers but many other exponentially expanding populations of landscape-changing weeds and pest animals. Only once these touchstones, models and threats have been secured should resources be allocated to enhancement and restoration. Offsetting is generally not compensation for loss of primary habitat with all its history and complex landforms, soils, and soil organisms.

Specific to our interests in the RRZ, we note the aspirations of GtRZ for enhancing the Otakaro green corridor through pest plant control, protecting native plant and bird populations, and enhancing the riparian, backswamp, floodplain and higher terrace or dune lands with appropriate reeds, tussocks, shrubs and trees. GtRZ also supports the establishment of dark sky lighting in the red zone to encourage natural night-time behaviours for plants and wild-life. We note also that Canterbury is the largest region in the country that does not have easy access for its residents and visitors to the birthright experience of personally encountering our charismatic and endangered wildlife. Every other part of the country has either extensive natural habitat, or fenced, or island sanctuaries within easy reach. We therefore submit that ECan **support a 'green red zone' and the complementary, indeed essential, proposed (Waitakiri) eco-sanctuary based around Travis Wetland.** Especially in an urban environment, a fenced sanctuary is the only means of protecting and displaying the special wildlife that cannot tolerate introduced predators. This will also provide the essential halo effect for the rest of the (greened) red zone and the city. As such it is a source and stepping stone through space and time – to an aspirational Pest Free New Zealand!

Additionally, planting most of the red zone in native trees goes some way in addressing climate change. Christchurch has a prime opportunity to reduce its carbon emissions by returning the red zone to nature. Sea Level Rise (SLR), along with more storms and droughts, requires a long-term planning horizon. In 180 years (to the end of next century), we anticipate moving Eastern Christchurch to the west since all indications are that we are on track for significant SLR in that timeframe. In order to protect valuable assets (including people and their houses, and the eco-sanctuary), we need to think about how to transition movable assets, and how, in the meantime, to protect higher ground in the 'greened red zone', with judicious and careful placement of barriers.

We also submit that more research and transparency around climate change risks should be supported by more resources being directed there.

In summary 1. Address long-term nitrate pollution.

2. Allocate more resources to more firmly monitor and prevent pollution to protect biodiversity and to protect against climate change risks.

3. Lobby Government to change the RMA and LGA to achieve points 1 and 2

4. Work more closely with the CCC, DoC, Ngai Tahu, the Callaghan Institute and others for greater effectiveness of all of ECan's plans and strategies

5. Enforce more firmly ECan's strategies to protect every aspect of the environment

6. Support a 'green red zone' and an eco-sanctuary near Travis Wetland.

7. Be more proactive in addressing climate change by providing barriers against SLR.

Thank you

Marilyn Yurjevich, Secretary on behalf of Greening the Red Zone Inc.

Action officer

Dann Olykan

Submission Summary

1. Address long-term nitrate pollution.
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 5. Enforce more firmly ECan's strategies to protect every aspect of the environment
 6. Support a 'green red zone' and an eco-sanctuary near Travis Wetland.
 7. Be more proactive in addressing climate change by providing barriers against SLR.
- Refer to submission for further detail.