From:
Sent: Sunday, 25 March 2018 1:05 p.m.
To: Mailroom Mailbox
Subject: LP Submission
Attachments: Submission to ECan on their LTP_March 2018.docx

Dear team

Attached please find my submission to the Long Term Plan.

I have added my name and address at the end of the submission. I do not want my name made public.

Regards

Submission on "Consultation on the Long Term Plan for 2018 to 2028" (the document)

My submission will focus on the two strategic areas of freshwater management and indigenous biodiversity.

I endorse these two priorities as the most important and pressing issues for the regional council to progress over the next 10 years.

However,

1. Contextual information on freshwater management

I could not find any contextual information in the document with which to assess the extent of progress on freshwater management, both in terms of quantity and quality,that had occurred as a result of implementing the last Long Term Plan. How have the priority catchments for this 10 year period been identified, and what are the environmental results the Council is proposing for freshwater management in these catchments in 2018 to 2028?

Without this information, it is not easy to comment intelligently on the proposals in the Long Term Plan.

2. **Contextual information on indigenous biodiversity**

Similarly, I would have expected some information on the areal extent of indigenous habitat that has been either restored or maintained due to regional council efforts over the last 10 years, and some indication of the change in quality of that habitat. Again, do the priority areas for improving indigenous biodiversity need to change from the last Long Term Plan to this one? And what environmental results are being sought for this 10-year period?

Some hints on what the programmes for Braided Rivers and Wetlands (refer page 8) might be, and what results might be achieved would have helped, together with proposed measures of progress.

This information would have been very useful to better assess the proposals in this document.

3. Proposed community outcomes

I didn't have much success finding the proposed community outcomes, and consider that these should have been better identified and expressed in the document.

On page 4 of the document under the two headings of freshwater management and indigenous biodiversity are statements in italics that might be deemed to be outcomes. However, both of them seem to me to be "input" statements and do not give any idea of the results to be achieved over the term of this Plan.

The only other possible proposed community outcomes are on page 22 but these are vague. For example, "we can all breathe clear air". Actually as human beings we have to breathe the ambient air whether it is clear, or clean, or not; we have no choice.

I would have expected this document to use the SMART acronym for describing community outcomes i.e. Specific, Measurable, Achievable, Realistic, and Timely.

I suggest that any proposed community outcomes make use of this acronym to give the public a more factual expression of the proposed community outcomes. For example, for air quality, a possible result (or outcome) could be that "over the next ten years, air quality will meet or exceed the national standards for contaminants 95% (or appropriate number) of the time in selected airsheds (to be identified).

Then in the next Long Term Plan, a graph of the exceedances could be included to give the public an indication that air quality in selected airsheds has improved or not.

4 Monitoring

I endorse the comments on page 6 entitled "Are we making a difference?" and look forward to more accessible information on the contribution made by the regional council in achieving environmental outcomes. The key question to answer is "is progress towards the community outcomes being achieved?"

5. Biodiversity and Biosecurity

I would have liked some explanation of what the "step-change" in effort (refer page 4) might be. I referred from page 4 to page 8, and from page 8 to page 4 without being any the wiser.

I trust the Council will be using concepts such as connectivity as a tool to make decisions on which catchments, or parts of catchments are best targeted. There is only limited ecological benefit in having one or two landholders in a priority catchment working on restoration or regeneration and what is usually needed is a catchment-wide effort.

6 A gap in the document

The issue of improving biodiversity in urban areas is sadly lacking in this document. While this issue is the responsibility of territorial authorities, there is a facilitating role for the Regional Council. Within the region's cities and towns, there are opportunities to engage the community and to demystify what biodiversity means and how valuable it is. There is very little indigenous habitat in Christchurch and very few native birds. This is in stark contrast to Wellington where Zealandia and environmental groups have restored or maintained indigenous habitat and the results include many of our indigenous bird species being found in numbers in the city and surrounds.

7. Sustainable development

Finally, on page 22 the issue of facilitating sustainable development gets a mention. Considering sustainable development underpins our society, I thought it should have been mentioned at the beginning of the document. In giving effect to progressing sustainable development in Canterbury over the next 10 years, some difficult choices will have to be made if we are to maintain or improve the

quality of the Canterbury environment on which our economy and social fabric depends. The health of our rivers is dependent on maintaining sustainable flows, and goals like having swimmable rivers will require setting water quality standards that may restrict some intensive land uses in some catchments.

I suggest that an initial assessment of progress towards sustainable development for the region is developed and then included in subsequent long term plans.

Thank you for the opportunity to make a submission on this document.

I do not wish to have my name made public.