From: Steve McNeill

To: Environment Canterbury **Subject:** Annual Plan Submission

Date: Monday, 11 March 2019 9:17:39 p.m.

Steve McNeill just submitted the survey 'Draft Annual Plan 2019/20 Feedback' with the responses below.

Draft 2019/20 Annual Plan Feedback

The work of Environment Canterbury is reported on under six portfolios as outlined in the draft Annual Plan document 2019/20. Our website outlines many of the areas we work in, in more detail. Please give your feedback on the activity planned in the comments section under each portfolio and tell us what you support/don't support about the planned activity.

I generally support the plan for Regional Leadership

No

Please provide any comments below

The preamble wording (page 6) of the Annual Plan for 2019/20 suggests many factors are taken into account when developing the detail of the LTP, "....including existing plans and strategies that the community has already confirmed..." Under the Local Government Act the community cannot confirm anything, as only the elected and appointed Council confirms existing plans and strategies – in Ecan's case, by using community inputs selectively. Also on page 6 there is a quote "more information on all the aspects of the work of Environment Canterbury can be found on www.ecan.govt.nz." This is untrue – where are the full details of individual activities and costs that Council is undertaking? All information is summarised at a high level and there is no why, where, when and how details and no cost breakdown for individual projects. A search of the website using the words annual work programmes circles back to the Long Term Plan and is of no use. If the community is to be informed then please make information available. Levels of Service generally have "soft" and meaningless targets such as issuing a report, or agree a schedule or work programme. Talk of collaboration and cooperation is a shockingly soft option compared with good science, hard work and common sense.

I generally support the plan for Freshwater Management

No

Please provide any comments below

LOS 3 talks of annual work programmes. All information is summarised at a high level and there is no why, where, when and how details and no cost breakdown for individual projects. A search of the website using the words annual work programmes circles back to the Long Term Plan and is of no use. If the community is to be informed then make information available. Also, using the desktop rates tool indicates that 45.6% of city rates funds Freshwater Management, but Christchurch ratepayers fund 64.4% of the total 2018/19 budget. The desktop tool is therefore not presenting a 'true' picture for the community.

I generally support the plan for Biodiversity and Biosecurity

Please provide any comments below

On page 6 of the draft there is the following wording "...to give an idea of what is already taking place in year one (please note that the Annual report for 2018/19 will outline this in more detail)..." This is an example where Ecan fails the community – there is no detail provided for community inputs prior to an activity taking place, as the detail is provided after it has occurred. For Biodiversity a city resident pays 10.9% of their General rate according to the desktop tool – but the city contributes 54.9% of the total activity budget; and for the Targeted rate component the indication is that 6.3% of the targeted rates paid for the Biodiversity activity, but the city funds 90% of the targeted rate total for that activity. The tool does not provide transparency.

I generally support the plan for Hazards, Risk and Resilience

No

Please provide any comments below

If climate change was a real issue for council it would have insisted that District councils zone for sea level rise and enhanced flood plain risk. These Councils should purchase properties zoned at-risk and rent them back for a 25 year term or until the perceived risk is realised. After an initial capital cost this would be largely self-funding and managed retreat would be managed relatively painlessly. If action is needed then act.

I generally support the plan for Air Quality

Yes

Please provide any comments below

Fees for burner installation seem to be on a licence to pollute basis.

I generally support the plan for Transport and Urban Development

No

Please provide any comments below

Hubs and spokes is a disaster for users. The bus system is now very inconvenient to use and my own use is greatly reduced as a result. The current subsidy of more than \$3 per passenger trip will get worse and is not sustainable for ratepayers. Please provide a user friendly and convenient bus system.

Overall feedback on the draft Annual Plan 2019/20

I generally support the draft Annual Plan 2019/20

No

Please provide any comments below

The large increases in General and Targeted rates indicate poor planning by Ecan for the 2018-28 Long Term Plan. The poor planning, poor consent monitoring and poor enforcement have resulted in the environmental degradation in Canterbury today. With only a fraction of the 24,000 consents monitored each year, there is a need for less funding

for talking and more funding taking action to monitor consent compliance.

Fees and Charges Policy

I generally support the proposed new charge for non-compliant incident response

Yes

Please provide any comments below

No Answer

I generally support the proposed new charge for annual water-use data management

Yes

Please provide any comments below

No Answer

I generally support the changes to the existing schedule of fees and charges

No

Please provide any comments below

No Answer

If you have any additional comments on the Fees and Charges Policy please provide them below.

No Answer

Revenue and Financing Policy

I generally support the proposed changes to the Revenue and Financing Policy to amend the land value/land area split for Regional Targeted Pest Management rates

No

Please provide any comments below

Surely the pest plan preparation considered funding methodologies. If not, why not? This seems an unwarranted change to funding for the activity so soon after the development of the long term plan.

I generally support the proposed changes to the Revenue and Financing Policy to create a rating area (including the Port Hills) to support the vision for a pest-free Banks Peninsula

Yes

Please provide any comments below

No Answer

If you have any additional comments on the Revenue and Financing Policy please

provide them below.

The Revenue and Financing Policy of the Canterbury Regional Council does not provide a breakdown or complete an assessment of benefits against costs for ratepayers. Benefits are not defined except for a broad-brush approach that a benefit "may" accrue from rates paid. The result is that both Christchurch city business owners and city residential property owners pay a disproportionate amount of the Canterbury Regional Council's rates, and the rural communities are currently being subsidised by Christchurch ratepayers. All Canterbury Regional Council property rates should be based on a benefit /cost calculation. Christchurch ratepayers will contribute more than \$97M of the Canterbury Regional Council's \$170M budget for the 2018/19 financial year. The \$97M is made up of general and uniform property rates payments; targeted city-based rates; the city contribution to NZTA grants via fuel taxes, etc (calculated from NZTA's vehicle kilometres travelled data for Canterbury); and user pays for bus passengers. Christchurch businesses are rated 69.7% higher for General Rates by the Christchurch City Council based on calculated benefits. The Canterbury Regional Council does not apply a business differential for either urban or rural businesses. An internet search confirms that Federated Farmers, Business NZ and other industry groups all consider that farms are defined as businesses. CRC's Biodiversity and Biosecurity; Freshwater Management; Hazards, Risks and Resilience; and Regional Leadership portfolios are closely aligned with regional/rural areas. The CRC should introduce a revenue and financing policy that includes a rating differential for three categories - urban business; rural business; and remote rural business.

Supporting documents

Attach any supporting documents (if applicable)

No Answer

If you are submitting a video submission, please add your Youtube or Dropbox link in the box below

No Answer

Public Hearing

I wish to speak to Council on my submission

No

Public Information

All information contained in a submission under the Local Government Act 2002, including names and addresses for service, becomes public information. Your information is held and administered by Environment Canterbury in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. All submissions are public documents and copies and/or a summary including your name, address and submission will be published on our website. It is therefore important you let us know if your form includes any information including your name and contact details you consider should not be disclosed. Please let us know in the comments box below

Please provide comments below

No Answer

How did you find out about this consultation?

Website