

18 March 2019

The Chair
Environment Canterbury
PO Box 345
Christchurch 8140

Dear Steve

Timaru District Council Submission to Environment Canterbury Draft Annual Plan 2019/20

Thank you for the opportunity to comment on the Environment Canterbury draft Annual Plan 2019/20.

The Timaru District Council does wish to speak to this submission.

We offer the following specific comments for the Council's consideration:

1) Transport and Urban Development

Council supports Environment Canterbury's plan for Transport and Urban Development in 2019/20. We support the current investigation of a demand responsive public transport system for urban Timaru to ultimately replace our scheduled bus service. We appreciate the partnership approach to this change and the opportunity to work with Environment Canterbury and the New Zealand Transport Agency (NZTA) on this project.

We consider that this innovative approach to public transport is of national significance in regard to providing greater public transport opportunities to smaller communities. We believe it appropriate that Environment Canterbury seek further funding from NZTA to assist with the implementation of this system and Timaru District Council confirms support for this approach.

In carrying out this work, it is important Environment Canterbury recognises equally the needs of those current customers who are transport disadvantaged, with growing public transport patronage. We urge you to ensure that throughout this transition of service provision you continue to provide a reliable and quality public transport service to these customers.

Decision sought:

- *That Council's support for Environment Canterbury's pursuit for additional funding for the implementation demand responsive transport system in Timaru from NZTA is noted.*
- *That a robust transition plan is developed ensuring throughout the change to a demand responsive public transport system the needs of all customers, particularly those who are transport disadvantaged, continue to be met.*

2) Freshwater Management and Biodiversity

The Council acknowledges the ongoing work in improving freshwater management undertaken by Environment Canterbury and the successes and progress generated through the Canterbury Water Management Strategy (CWMS) and water zone committees. We acknowledge the ambitious work of the 'Fit for the Future' review of the CWMS and look forward to the final report in May 2019. It is essential that the implementation of the revised CWMS goals is appropriately supported through leadership, resources and funding over the lifetime of the Strategy.

We support the Plan's provision of additional resourcing within zones to enable the implementation of significant zone-based projects. Council would like to particularly highlight the importance of Environment Canterbury's leadership and ongoing support for the improvement of Waitarakao/Washdyke Lagoon and Otipua-Saltwater Creek as part of zone and regional implementation programmes.

Council would also like to highlight the need for Environment Canterbury to allocate funding to the management of Serpentine Creek, Geraldine. The low water quality and ecological conditions of the creek and the limited flood capacity in Lower Serpentine Creek have been identified by Council as key issues in this catchment. The Geraldine Stormwater Management Plan commits Timaru District Council to addressing the low water quality for the creek in the urban catchment, but whole-of-catchment water quality and flood mitigation will require leadership and funding from Environment Canterbury.

We support the collaborative and enabling approach Environment Canterbury is taking for the biodiversity and biosecurity portfolio through the Immediate Steps biodiversity fund. We look forward to working with Environment Canterbury on the Orari Temuka Opihi Pareora Zone Implementation Programme addendum recommendations to achieve local and regional freshwater management and biodiversity goals.

Decision sought

- *That support for the Freshwater Management and Biodiversity programmes undertaken by Environment Canterbury is noted.*
- *That the improvement of Waitarakao/Washdyke Lagoon and Otipua-Saltwater Creek continues to be supported as part of zone and regional implementation programmes.*
- *That Environment Canterbury include funding for freshwater management and flood protection for Serpentine Creek, Geraldine.*

3) Hazards, Risk and Resilience

Council notes and supports the priority focus areas of flood protection and control infrastructure to protect lives and assets; working with partner organisations and communities to better identify and manage risks; and, where possible, taking steps to eliminate or reduce the impact of risk. Council also supports the climate change integration work programme and looks forward to working with Environment Canterbury to improve our understanding of the risks climate change poses to the Canterbury region.

Council is concerned that, in spite of these priorities, there is a proposed reduction in the 2019/20 budget for the Coastal Environment and Hazard work stream from the Long Term Plan (LTP) 2019/20 budget. Further, the draft Annual Plan is silent on the review of the Regional Coastal Environment Plan (RCEP), which was scheduled in the LTP to be initiated in 2019/20. This work is of critical importance to the development of district plans across Canterbury, and a legislative requirement under the Resource Management Act 1991.¹

We would like to highlight that the review procedure of the RCEP states that reviews should be undertaken at a shorter interval than the legislatively required 10 years to:

1. ensure that the Regional Coastal Environment Plan reflects change and greater knowledge about the management of the coastal environment; and
2. align the Regional Coastal Environment Plan with legislative change and other Regional and District Plans.²

In spite of this, Environment Canterbury informally advised Timaru District Council in 2018 that the baseline information which informs both coastal erosion and inundation lines is out of date and updates to this information will not be available until 2020. We see this as problematic as the ability to update seawater inundation lines in the Timaru District Plan (currently under review) relies on, at least in part, Environment Canterbury's baseline information and the location of the updated coastal erosion lines. In order to meet our legislative responsibilities to review of the Timaru District Plan and provide accurate hazard information, Council cannot rely on this out-of-date information about coastal hazards.

The RCEP, and the coastal science work which sits behind it, should be central to Environment Canterbury's climate change integration work programme and the Hazards, Risk and Resilience portfolio. Council seeks assurances that this review will not be delayed further.

¹ Section 79 (1), Resource Management Act, 1991.

² "11.3 Review Procedure", Regional Coastal Environment Plan, 2005 (2012 amendment), Environment Canterbury, 11-161.

Decisions sought:

- *That the review of the Regional Coastal Environment Plan is initiated in Year 2 (2019/20) and drafted and consulted on in Year 3 (2020/21) as detailed in the Long Term Plan.*
- *That Environment Canterbury expedites work on the coastal hazard baseline information, particularly the coastal erosion lines and inundation lines. This information needs to be appropriate for a District Plan Review and provided before June 2020.*

4) Regional Leadership and Collaborative efforts

Timaru District Council acknowledges and values highly the ongoing work of Environment Canterbury in facilitating collaboration across the region on a range of work programmes and projects. Ongoing support for the regional forums and technical working groups is essential for strong regional advocacy and advancing economic and social development throughout Canterbury.

Decisions sought:

- *That support for the regional leadership role undertaken by Environment Canterbury is noted.*

Council looks forward to continuing to work closely with Environment Canterbury in 2019/20 and beyond.

Yours sincerely



Damon Odey
Mayor