

REGIONAL LEADERSHIP COMMENTS

Submitter ref	Submitter name	Support (Y/N)	Submitter comments	Staff comments	Wishes to be heard?
1	Andrew Gilligan	No	The leadership has totally lost touch with what they are there to do, whom they represent and why they are doing it. The rate payers are not an endless source of money, many thousands of people cannot afford to make ends meet now, an increase year on year is not a sustainable model.	Doesn't support, concerns about rates affordability and leadership raised.	No
2	Anon	No	The plan overall confirms past decisions. There is little new or original thought and previous policies can be seen as corrupt in certain lights. It is essential this concern be addressed, because if it is not and it is confirmed the entire structure or ECan will be questioned and its very existence threatened.	Doesn't support, indicates concerns with current policies and no change. The Annual Plan is year 2 of the Long- Term Plan 2018-2028 which was consulted on.	Yes
3	Arpad Nagy	Yes	I can't bring any example, however, I know a large organisation has to make plans, has to work around budgets, so I'm aware of the importance of these things.	General support.	Yes
6	Leanne Reid	No	I have no faith in this council or their decision making after their refusal to listen to Canterbury ratepayers re water bottling plant!	Doesn't support on basis of water bottling concerns, Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No
7	Andrew McKay	No	I disagree with the proposed councillor numbers, it is heavily skewed to over representing the rural community. This is nothing more than a stitch-up. I disagree with any unelected appointees. All must be elected and represent a region or the whole region. That is democracy.	Doesn't support and refers to representation review and elected representatives. Results of representation review were made available by Local Government Commission on 11 April 2019. On 12 October 2019, elections will be held and there will be no appointed representatives.	No
9	Paul Hamilton	Yes	I notice the inclusion of "evidence-based policy" as a term. I'd ask that this be strongly referred to and enforced. Too much consideration is given to anecdotal claims and protests that have little to no evidence behind them, scientific or statistic. The 'status quo' seems to have been given a strong legitimacy and science unto itself, when in many areas such as freshwater resources, native biodiversity, climate change impacts, transport solutions - the status quo has wreaked considerable damage on the environment. I'm happy for changes to remedy that to be debated, but it needs to be debated based on facts and the greater good for the entire region, not JUST the loudest voices, those with the means to get themselves on the media and those who stand to be negatively impacted.	Supports, and requests that policy is evidence based and enforced on balance with consultation. Comments noted.	No
12	Michael Will	No	WE need better leadership than the one we have had since 2012.	Doesn't support. On 12 October 2019, elections will be held.	Yes
16	Haidee Scott	Yes	I wholly support the intention of the plan for Regional Leadership. The small amendments reflect a genuine intention of doing true community engagement well.	Supports, no specific action requested.	No
20	Alex Hallatt	No	The planning and consent process sucks, costs homeowners crazy money, is inefficient and is losing the council money. Find out where this is not the case and copy them. It's not working in Chch.	Doesn't support and expresses concerns about planning and consenting process. Unclear whether submitter is referring to building consents under CCC jurisdiction given reference to Christchurch. No further details given.	No
29	Leslie Hogbin	No	The current proposed rates rise tells me the organisation is so out of touch with the community that pays for it and that drastic remedial action is required. To propose this massive degree of rates increase tells me that the organisation is out of control and thus leadership cannot be supported, let alone plans that do not bring leadership back to reality.	Doesn't support and expresses concern about rates rise/affordability.	No
32	Peter McBride	No	This entire system is nothing more than a deliberate tax upon innovation and does not protect or husband if you like the environment. Rather it just creates a cozy habitat for yet another layer of corporate leeches	Doesn't support and expresses general dissatisfaction. No specific action requested.	No
35	Steve McNeill	No	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.	Doesn't support and raises concerns with page 6 of Annual Plan and transparency of information. The Annual Plan refreshes the year of the LTP with the changes that have occurred since the last LTP. The LTP and Annual Plans are provided to the community for feedback and this feedback helps the Councillors confirm what changes need to be made. ECan complies with all the Local Government Act reporting requirements and there is an audit of the LTP. ECan also provides two levels of financial project information (which exceeds the legal requirement). This financial information is available on the desktop rating tool on our website and is the lowest level of information in our organisation.	No

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48	Tim Lockwood	Yes	I support the words that have been written in this draft plan and the strap line of robust regulatory process with support for well informed decision makers. However there seems to be a serious lack of courage to be leaders and follow through with the sentiment of the plan for regional leadership currently. Well informed decision makers would not allow the resource consent, for Fonterra to burn obscene amounts of coal, to continue in the face of overwhelming evidence that it is a direct cause of climate change. A leader would challenge them and help them achieve a better solution for their business and our region. ECan leadership is not being robust by passing the can to central government, they should challenge central government (in the courts if required) on issues such as discharge of greenhouse gasses bring mitigation and not to be considered in consents. Your hands are not tied, make them accountable, if you are to be leaders.	Supports, but expresses concerns about leadership and decisions such as Fonterra consents for coal burning and greenhouse gas emissions. The resource consent process is set down under the Resource Management Act which is an effects-based assessment. The Resource Management Act does not currently allow Council's to take into consideration greenhouse gas effects as part of this process.	Yes
64	Georgina Waibl	Yes	I support the people first, collaborative partnership model.	Supports, referring to the collaborative partnership approach.	No
70	John Bowden	No	Unnecessary	Doesn't support, unclear what aspect the submitter is referring to.	
71	Te Rūnanga o Arowhenua	Yes	Te Rūnanga o Arowhenua welcome the commitment to the Tuia relationship however, request financial assistance to assist Papatipu Rūnanga to update strategic documents and management plans within Annual Plan budget i.e. Iwi Management Plans. Refer to submission for further details. Te Rūnanga o Arowhenua also submit that the relationship with Te Rūnanga o Arowhenua and Ngāi Tahu should continue to be affirmed as a top priority for Environment Canterbury and that there continued to be discussion with all Rūnanga including Arowhenua on how the Tuia relationship should be recognised in the Annual Plan. Submit that the relationship and funding of programmes/projects between Environment Canterbury and Papatipu Rūnanga is invariable.	This request will be managed within existing Tuia budget. Staff support allocating \$30,000 in this AP for the next FY, and \$30,000 for the following FY towards developing the Iwi Management Plan (our total contribution being \$60,000 out of a total estimated cost of developing the plan at \$120,000). Environment Canterbury's relationship with Papatipu Rūnanga and Te Rūnanga o Ngāi Tahu is embedded in the way we work across the organisation and underpins the culture and work of Environment Canterbury staff. Our strategic priorities for the Long-Term Plan of freshwater management and biodiversity are both important with respect to improving mahinga kai.	Yes
86	Pam Richardson	Yes	Regional Leadership is vital - covers a very large area and provides opportunities to work across District Council boundaries	Supports, referring to Regional Leadership.	Yes
91	Federated Farmers		Federated Farmers is very concerned about the large increases in total operating expenditure and total rates budgeted for the 2019/20 year compared with 2018/19 (7.7% and 8.9% respectively). We ask that council constrains expenditure below the rate of inflation, because any form of rate or user charge (to fund that expenditure) will impact on rate payers and ultimately the regional and national economies. Federated Farmers asks that expenditure and rates be contained within the LTP projections because there appear to be no changes to the LTP targets which would justify such increases. (see attached submission).	Raises concerns about rates rise from LTP projections. The 2018/19 the rate increase was 4.9% not 7.7% and the 2019/20 proposed 8.9% includes a 3% increase of targeted public transport rates which will not affect farmers	Yes
92	Opāwaho Heathcote River Network	n/a	The Opawaho Heathcote River Network (OHRN) asks ECan to ensure communities of interest are provided with relevant and digestible information so they can effectively engage in the planning process. OHRN seek funding from ECan for the ongoing development of the OHRN Baseline Information Project for the Opawaho Heathcote River and its catchment. (see attached submission) In addition to the points raised in their written submission, a request was made for \$4,000 towards a baseline information/communication project to provide the community with accessible information about the catchment. Funding from sources had already been obtained.	Seeks funding for ongoing development of the OHRN Baseline Information Project. A letter will be sent to the submitter to address the specific points raised following hearing which will invite OHRN to discuss with staff. It is unclear what planning process is being referred to as the comprehensive stormwater planning process is already in place and the Land and Water Regional Plan already exists. CCC provides a relevant and digestible annual report on the current health of the river through its new Report Card. The actions communities can take to improve the health of the River are already well understood and this Project should be relatively straight forward to achieve. Staff would be happy to sit down and talk with relevant people to discuss what their needs are noting that the \$4000 request is 2019/20 financial year only.	Yes
99	Timaru District Council	Yes	That support for the regional leadership role undertaken by Environment Canterbury is noted (see attached submission)	Support for the Regional Leadership role of ECan is noted. No action requested.	Yes
100	Jennifer Porter	Yes	Not sure where this is located in the booklet - Found it later!	Supports, no action requested.	No

FRESHWATER MANAGEMENT COMMENTS

Submitter ref	Submitter name	Support (Y/N)	Submitter comments	Staff comments	Wishes to be heard?				
1	Andrew Gilligan	Yes	Yes I do but, giving the resource away for commercial gain is not acceptable, given the resource is not unlimited what happens when it runs out? Who meets the future costs? Not ecanz, the rate payers do.	Supports, but expresses concern about water management and future use/costs. Comments noted.	No				
2	Anon	No	Fresh water management and storm damage prevention are the same problem. The CO2 causes global warming is a corrupt farce. I can prove global warming exists and that it is cyclical - but, for the purposes of this debate that doesn't matter - what does matter is this: What would your reaction be to water management if you knew global warming was cyclical? It would be entirely different. This is a big debate but because of normative government you have never held it. Have you? Take a walk around your office and come back. - This is different isn't it?	Doesn't support. Comments noted.	Yes				
3	Arpad Nagy	No	I don't follow these organisation closely enough to be able to comment on this.	Doesn't support but recognises doesn't follow organisation closely enough.	Yes				
6	Leanne Reid	No	Ecan will raise their fees by 'alittle' when they give away our water, our natural resource for free except 'alittle' consent fee. You are suppose to be working for CANTERBURY not the bottling plant, giving more and more away! Especially when NONE of the benefits of the sale of our water returns to our shores and you are helping to enable the use of more plastic bottles. You're not working for the environment, the people who elected you, or NZ as a whole. Shame on you all!!	Doesn't support and raises concerns about water bottling. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No				
7	Andrew McKay	No	Too much pollution has been permitted, too much water over allocation. The increased pollution into rivers, aquifers and lakes is an ECAN failure. The NPS is not a target to allow pollution to get to.	Doesn't support and raises concerns about water quality. No specific action requested.	No				
9	Paul Hamilton	No	More needs to be sooner done to address the limited volume of fresh water in the region, and the pollution that is starting to be detected in drinking water supplies such as nitrogen leeching. The externalities of activities in the region like dairy and beef farming have not accounted for the huge damage that is being done to the region's fresh water resources. This needs to be addressed rapidly and again it should not be the loudest voices, parochial and antiquated farmer stereotypes, or those with means to get themselves onto the media that get to direct this debate.	Doesn't support, referring to water quality concerns. Wants more to be done. There are now limits in place that restrict the development of intensive farming in high risk areas. The Land and Water Regional Plan (LWRP) sets limits on nitrate leaching which hold the line in terms of further intensification.	No				
11	Sophia McNeill	Yes	But charge us for it, it should have been maintained over the year now just start now	Supports, but requests charging for water. Charging for water raises the issue of ownership which itself raises a wider national level issue of iwi rights and interests. Until this national level issue has been addressed, charging for water is unlikely to be implemented successfully at a local or regional level.					
13	Maree Horlor	Yes	I think it's really important that we get back to being able to wade / swim / walk the dog in any of our rivers and streams at any time of the year. I'm disgusted that the rivers have got so bad under ecan's watch - my family used to swim in the river going through Geraldine in the summer holidays, but we'd be lucky to safely paddle there now (and have to look up whether we can). Please make sure the environmental monitoring is done rigorously and thoughtfully. I support the focus on quality and quantity.	Supports focus on water quality and quantity. Expresses concern about quality and requests rigorous monitoring.	No				
17	Harriett Scott	No	You acknowledge in the plan that "water 'quality and quantity' is one of the foremost issues confronting the Canterbury community over the next 10 years. There is acknowledged over-allocation of some aquifers and rivers due to a legacy of water permits granted based on the best available information at the time, but information which has now been demonstrated as incomplete". Yet you grossly misrepresent the people of Christchurch by giving lip service to a goal of implementing "solutions to manage our freshwater resource to support community use". The key here is to the community, yet you have allowed further expansion of water extraction by a company who takes our clean, unchlorinated water directly to bottle for export to China. We, the people you are elected to represent, suffer water restrictions and chlorination while seeing no benefit or profit at all. You added insult to injury by not allowing us to consult with you on this matter you deem so important - why? It certainly throws your existence into question. We may not be able to force the Belfast-based water company to pay for the water taken, and i understand there are many reasons why, but you should be imposing a fee payable per plastic bottle they fill. These funds could then be redirected into the community you claim to support - back into your freshwater plan.	Doesn't support and expresses concerns about water allocation and plastic waste. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/					
20	Alex Hallatt	Yes	Where are the sites for lake water quality - sites are all struck through. Also, there is plenty about measurements but nothing about what will be done about water users breaking the law: how ECAN will prosecute to achieve the targets.	Supports, but requests clarification for sites for lake water quality, outlined below <table border="1" data-bbox="1685 1770 2733 1854"> <tr> <td>Lake water quality</td> <td>33 (high country) 3 (lowland) 3 (coastal)</td> <td>Monthly over summer Quarterly Monthly</td> <td>Statistics published on lawa.org.nz, data on ECan website</td> </tr> </table>	Lake water quality	33 (high country) 3 (lowland) 3 (coastal)	Monthly over summer Quarterly Monthly	Statistics published on lawa.org.nz, data on ECan website	No
Lake water quality	33 (high country) 3 (lowland) 3 (coastal)	Monthly over summer Quarterly Monthly	Statistics published on lawa.org.nz, data on ECan website						

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24	Robin Barraclough	No	Sadly, safe nitrate levels and monitoring are not mentioned. Evidence now shows higher levels of nitrates now linked to elevated levels of thyroid disease, colorectal, breast and bladder cancer, plus links to birth defects. Additionally, I support moving to charge for water use.	Doesn't support and expresses concerns about impacts on human health. Supports the move to charge for water use. Charging for water raises the issue of ownership which itself raises a wider national level issue of iwi rights and interests. Until this national level issue has been addressed, charging for water is unlikely to be implemented successfully at a local or regional level	Yes
29	Leslie Hogbin	No	The fiasco with the china owned water bottling company approval tells me that freshwater management does not pass the first hurdle-it's worthless! Additionally, the history of poor lake and river quality is also at environment Canterbury's door. I see nothing in this plan that changes the appalling management to date.	Doesn't support due to water quality and management concerns as well as water bottling. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No
32	Peter McBride	Yes	Only that this should not be devolved to regional level but is what we pay inordinate tax towards in central govt. let them do some work and sack the lot that rusticate locally.	Supports, but suggests that central government have responsibility. Environment Canterbury has responsibilities under the Resource Management Act.	No
33	Max Kerr	No	Stop allowing water bottling. A specific consent for a specific water take purpose should not be able to be changed for another use. Start charging for water.	Doesn't support and refers to concerns about water bottling and takes. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/ . Suggests charging for water. Charging for water raises the issue of ownership which itself raises a wider national level issue of iwi rights and interests. Until this national level issue has been addressed, charging for water is unlikely to be implemented successfully at a local or regional level.	
35	Steve McNeill	No	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.	Doesn't support, requests more transparency. ECan complies with all the Local Government Act reporting requirements. Financial information is available on the desktop rating tool and is the lowest level of information in our organisation.	No
36	Simon Britten	No	ECan has taken a weak approach to protection to groundwater protection with respect to transfer of industrial consents to water bottling operations, eg Cloud Ocean.	Doesn't support and refers to water bottling operations. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No
42	David Collins	No	More needs to be done	Doesn't support, requests that more needs to be done. No specific action requested.	No
48	Tim Lockwood	Yes	Question the effectiveness of a Non-plan plan that have been put forward. There was an effort to put across the work that is being done unfortunately the wording is something from a Monty python sketch; A sub committee to cover the report endorsed by the main committee that was put forward by the form for reporting efforts which has been reviewed for its effectiveness and will take another year to complete with \$50K thank you very much.... endless committee's are not solving the problems and are in fact stalling any effective work. We are now having to look for rivers that are safe to swim in. Why is this now becoming the 'new norm'. Why are their adverts for people to check the website regularly for up to date information on where is safe to swim? It means you have failed to live up to your very middle of the road standards to date, and impending lack of innovation & seemingly leadership shall continue.	Supports, and expresses concern about water quality, focus on collaboration and standards. Zone committees work with the community to develop recommendations and actions for councils and other organisations that are involved in water management. They also oversee and champion implementation of these recommendations by Environment Canterbury and other councils and organisations.	Yes
61	Frank Hill	No	The Canterbury Water Management Strategy has been the greatest environmental disaster that Canterbury has seen. The Regional committee quite rightly scored progress as 0. Funding is supposed to be by a levy not by general rates. Zone Committees have failed their communities - funding should be immediately stopped. All Zone committee members should be elected.	Doesn't support and refers to CWMS.	No
64	Georgina Waibl	Yes	I support the collaborative community-led model for freshwater management through zone committees. I support the appointment of Land Management Advisors.	Supports, collaborative approach and the appointment of Land Management Advisors. Comments noted.	No
70	John Bowden	No	The Council have enough reps involved in this already	Doesn't support, expresses concerns about number of representatives.	
72	Alex McNeill	Yes	I'm concerned that consented water users will not have their water usages tracked daily. I hope this method is still accurate and doesn't lead to "fudging" of the numbers. Cantabs take our water very seriously and we do not want to run out of water or have it contaminated.	Supports, but expresses concerns about lack of daily metering for consent water users.	No
83	Bernard Wilkins		Water for export should be taxed per bottle.	No indication of support/non-support but suggests water for export should be taxed.	
86	Pam Richardson	Yes	Some amazing work is being undertaken with communities. Great networks and improved understanding of the "Maori World" just wonderful opportunities. Need to be encouraging land owners to work together in our water catchments.	Supports, and gives examples of work being done. Suggests encouraging land owners to work together.	Yes
87	Te Hapū o Ngāti Wheke		Disappointed about lack of recognition for the Whaka-Ora Healthy Harbour Plan in the Annual Plan. (see attached submission).	Noted. Staff advise that a line is included in the narrative of the Annual Plan to recognise this significant work.	Yes

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91	Federated Farmers		Federated Farmers supports the minor changes to LTP targets to do with environmental monitoring, provided they improve the effectiveness of environmental monitoring and fit within the current cost structure. Federated Farmers requests that ECan plans to manage water-take, rainfall, well level and river flow data so that it is readily available to provide catchment-level data month-by-month and season-by-season. This sort of data should be routinely available to irrigators and other interested parties such as Zone Committees.	Noted. Work is underway, but to make this information publicly available comes at a cost. The water data project will help assist in addressing the challenges in managing data to make more publicly available.	Yes
92	Opawhaho Heathcote River Network	Yes	The Opawhaho Heathcote River Network (OHRN) is seeking assurance that ECan will establish a process for community consultation, through the CWMZC, for the proposed Opawhaho Heathcote Stormwater Management Plan. We emphasise that this should be initiated in the early stages of SMP development and involve multiple engagements within the process to ensure adequate opportunity for community input. (See attached submission).	This will be integrated into the zone committees existing work programme.	Yes
98	Ashburton District Council	Yes	We note that on page 14 of the Plan, reference is made to the 'Resource Management Act Water Framework' with specific mention that, 'Research is ongoing to determine how consent reviews may be considered amongst other local solutions as an alternative or to complement plan change proposals in the Ashburton/Hakatere River catchment'. While we are unclear as to the detail of the research we look forward to being a part of any future conversations about these consent reviews in our District.	Environment Canterbury has been working closely with the Ashburton Zone Committee on the review of resource consents in the Ashburton District to give effect to the outcomes in the Ashburton Sub-region section of the Land and Water Regional Plan. The Zone Committee advice to Environment Canterbury has been that the consent Review focuses on <ul style="list-style-type: none"> - delivering a minimum flow of 6 cumecs by 2023 - irrigation consents rather than domestic and stock water consents - involves the wider public, with the consent review process being kicked off by a public meeting 	Yes
99	Timaru District Council		Timaru District Council (see attached submission) recommend That support for the Freshwater Management and Biodiversity programmes undertaken by Environment Canterbury is noted. That the improvement of Waitarakao/Washdyke Lagoon and Otupua-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.	Staff are confirming if the work referred to is covered within the existing zone and regional implementation programmes.	Yes

BIODIVERSITY AND BIOSECURITY COMMENTS (references to Revenue and Financing Policy in green)

Submitter ref	Submitter name	Support (Y/N)	Submitter comments	Staff comments	Wishes to be heard?
1	Andrew Gilligan	No	This is not ecanz area and should be left to specialist central government offices to take care of.	Environment Canterbury has responsibilities for indigenous biodiversity under the RMA.	
2	Anon	Yes	Yes, but - the fascination with native species of plants is misplaced unless they are threatened. New Zealand deserves the best of what the world has to offer. That is diversity.	Environment Canterbury has responsibilities for indigenous biodiversity under the RMA. ECan is seeking a step change in indigenous biodiversity through the LTP.	Yes
3	Arpad Nagy	Yes	As I have a very small knowledge about detail I have the same comment as in the first question.	Comments noted	Yes
6	Leanne Reid	No	I have no faith in this council or their decision making after their refusal to listen to Canterbury ratepayers re water bottling plant!	Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No
7	Andrew McKay	Yes	Yes, BUT, you much more protection of these landscapes is required.	Comment noted, ECan is seeking a step change in indigenous biodiversity through the LTP	No
9	Paul Hamilton	Yes	But why are there no concrete plans for some extensive native forest restoration and succession in appropriate parks, reserves, areas given that the regions has the least amount of original native forest remaining anywhere in New Zealand. It is a shameful statistic and other than vague rhetoric I do not see clear plans to address this. Why are there not plans to carpet the port hills with native forest or reserves/parks on the way to the west coast. There are infinite "rural landscapes" or "English style" gardens and parks in the area...it is time that effort was put into having similar native plant assets.	Comment noted, ECan is seeking a step change in indigenous biodiversity through the LTP. Primary focus is on protection and maintenance of significant biodiversity. Pest Free Banks Peninsula initiative seeks to protect habitats and biodiversity in the Port Hills and Banks Peninsula.	No
12	Michael Will	No	Farmers are not the only people you need to look after.	Comments noted	Yes
14	Amy Carter	Yes	It is exciting to see an increased focus on this area which has largely been under resourced. I strong support this initiative.	Support noted.	No
20	Alex Hallatt	Yes	More to be done to support domestic trapping as urban areas provide large pools of pests for repopulation.	Comments noted.	No
22	Bob Frame	Yes	Very supportive of a pest-free Banks Peninsula rates increase. Would like to see more specific reduction targets and goals.	Targets and goals for Pest-Free Banks Peninsula is something to be considered by the Pest-Free Banks Peninsula partnership collectively, rather than solely Environment Canterbury. This financial year, Environment Canterbury has provided some funding to the Pest Free Banks Peninsula Working Group to develop a work programme, setting out how it intends to work towards the pest-free goal, particularly over the next five years. This work will provide more specific information.	No
24	Robin Barraclough	No	Given the losses in biodiversity in New Zealand and the competing interests in this area, this isnt really enough	Comment noted. Targets and goals for Pest-Free Banks Peninsula is something to be considered by the Pest-Free Banks Peninsula partnership collectively, rather than solely Environment Canterbury. This financial year, Environment Canterbury has provided some funding to the Pest Free Banks Peninsula Working Group to develop a work programme, setting out how it intends to work towards the pest-free goal, particularly over the next five years. This work will provide more specific information.	Yes
29	Leslie Hogbin	No	Not enough funding and immediate action to make banks peninsula predator free. Farmers can control rabbits, to even mention rooks is stupid with at best a single bird and nothing about reintroducing native birds.	Comments noted. Targets and goals for Pest-Free Banks Peninsula is something to be considered by the Pest-Free Banks Peninsula partnership collectively, rather than solely Environment Canterbury. This financial year, Environment Canterbury has provided some funding to the Pest Free Banks Peninsula Working Group to develop a work programme, setting out how it intends to work towards the pest-free goal, particularly over the next five years. This work will provide more specific information.	No
30	Ian McFarlane	No	wouldn't h	Unclear what the submitter is referring to.	Yes
32	Peter McBride	Yes	only that this should not be devolved to regional level but is what we pay inordinate tax towards in central govt. let them do some work and sack the lot that rusticate locally.	Environment Canterbury has responsibilities for biodiversity under RMA. Indicates general dissatisfaction.	No
33	Max Kerr	No	Why are you not offering free traps for the public to use?	Targets and goals for Pest-Free Banks Peninsula is something to be considered by the Pest-Free Banks Peninsula partnership collectively, rather than solely Environment Canterbury. This financial year, Environment Canterbury has provided some funding to the Pest Free Banks Peninsula Working Group to develop a work programme, setting out how it intends to work towards the pest-free goal, particularly over the next five years. This work will provide more specific information.	
35	Steve McNeill	No	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.	ECan complies with all the Local Government Act reporting requirements. Financial information is available on the desktop rating tool and is the lowest level of information in our organisation.	No

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39	Mark Christensen	Yes	<ul style="list-style-type: none"> I 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. I ask that the Council programme in this change plus an additional \$400,000 from year 3 onwards of the Long Term Plan. The Council's funding will provide a foundation upon which other financial contributions can be leveraged. The Council's contribution is critical to securing the additional funding from other partners. The Council's support for Pest Free Banks Peninsula is a tangible demonstration of the step change in effort for biodiversity. It is consistent with the values and principles to which the Council has committed itself including regional leadership and working collaboratively with the community and partner agencies, including Ngāi Tahu. 	<p>Supports. Comments noted.</p> <p>Any increases in funding for year 3 of the LTP (2020 -2021) are likely to be considered by Council in the annual plan process for that year. Environment Canterbury supports Pest Free Banks Peninsula seeking funding from additional partners.</p>	Yes
41	Selwyn District Council		<p>Selwyn District supports additional funding to support the step change in biodiversity management especially in relation to the monitoring and compliance.</p> <ul style="list-style-type: none"> SDC is in support of the extra staff being employed by ECan to focus on braided rivers and wetlands. That will support and potentially align with the biodiversity work programme that SDC is running. SDC supports the Pest Free Banks Peninsula Programme and suggest that the Regional Council considers the suitable management of domestic and stray cats. SDC supports greater clarification concerning District Council and Regional Council responsibilities and potential crossover regarding terrestrial biodiversity. SDC would support consideration of how the Farm Management Planning process can assist with the identification and protection of terrestrial (as opposed to wetland/waterway) biodiversity. SDC is concerned about the impact of Biosecurity threats to the agricultural industry and existing biodiversity (for example established weed species such as Sycamore and Wilding Pines threatening Significant Natural Areas). It is to be hoped that technological advances in the future will provide for improved biosecurity outcomes. The Braided Rivers Programme is a suitable response to the environmental challenges that Canterbury's braided rivers face and increases the ability to protect, manage and restore biodiversity in those areas. Regarding target 9.2 - the BRAG project is important to help understand land ownership boundaries on the margins of Braided Rivers and to restrict the loss of river margin native biodiversity habitats to agricultural encroachment. The Wetland Programme is a good response to the continuing decline in the Regions wetlands. SDC looks forward to working with and supporting ECan in this programme within the Selwyn District. <p>ECan could consider assessing whether plan rules – regarding the provision and development of agricultural infrastructure such as irrigation – can have perverse and negative effects on wetlands and streams.</p>	<p>Comments in support are noted.</p> <p>Funding support for the braided rivers programme has previously been approved through the LTP and is unchanged in this annual plan. Support for this programme is noted.</p> <p>Whilst Environment Canterbury is not considering managing domestic and stray cats, in the context of Banks Peninsula, over the first five years the focus of Pest-Free Banks Peninsula/Te Pātaka o Rākaihautū will be on eradicating feral goats, and controlling pests such as possums, feral cats, mustelids (ferrets, stoats and weasels) and rats.</p> <p>There are ongoing work programmes with TAs to clarify responsibilities & engagement with TAs through district Plan reviews to ensure the roles and responsibilities set out in the Canterbury Biodiversity Strategy are achieved.</p> <p>Consideration of the effects of plan rules are undertaken during plan development.</p>	Yes
42	David Collins	Yes	<p>Particularly support the Pest Free Banks Peninsula initiative.</p>	<p>Support noted.</p>	No
44	Paul Bingham	Yes	<p>I 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. • I ask that the Council programme in this change plus an additional \$400,000 from year 3 onwards of the Long-Term Plan. • The Council's funding will provide a foundation upon which other financial contributions can be leveraged. The Council's contribution is critical to securing the additional funding from other partners. • The Council's support for Pest Free Banks Peninsula is a tangible demonstration of the step change in effort for biodiversity. It is consistent with the values and principles to which the Council has committed itself including regional leadership and working collaboratively with the community and partner agencies, including Ngāi Tahu.</p>	<p>Comments noted.</p> <p>Any increases in funding for year 3 of the LTP (2020 -2021) are likely to be considered by Council in the annual plan process for that year. Environment Canterbury supports Pest Free Banks Peninsula seeking funding from additional partners.</p>	No
45	David Miller	Yes	<ul style="list-style-type: none"> I 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. I ask that the Council programme in this change plus an additional \$400,000 from year 3 onwards of the Long Term Plan. The Council's funding will provide a foundation upon which other financial contributions can be leveraged. The Council's contribution is critical to securing the additional funding from other partners. The Council's support for Pest Free Banks Peninsula is a tangible demonstration of the 	<p>Supports. Comments noted.</p> <p>Any increases in funding for year 3 of the LTP (2020 -2021) are likely to be considered by Council in the annual plan process for that year. Environment Canterbury supports Pest Free Banks Peninsula seeking funding from additional partners.</p>	Yes

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			step change in effort for biodiversity. It is consistent with the values and principles to which the Council has committed itself including regional leadership and working collaboratively with the community and partner agencies, including Ngāi Tahu.		
48	Tim Lockwood	Yes	Work in this area has been directly effected by the freshwater work and they must work hand in hand to protect what we have and encourage natural restoration (as much as is realistically possible) with then effective & concentrated management where required. Focused areas rather than a little here and a little there, such as the banks peninsula pest free zone (which is commendable), is in my opinion the way forward. As much as we must embrace the 'tech' we must also recognise the simplistic crop rotation systems, strip field farming and other older techniques that worked so well for so long in many areas of the world, for centuries rather than decades, and without the detrimental effect to the ecosystem. You will not require to spend hundreds of thousands on R&D of this kind of work as it has already been done. This is unachievable for land owners without subsidies for initial support though.	Comments noted.	Yes
60	Gavin Loxton	Yes	On behalf of the horehound biocontrol group, i would like to request support for monitoring and establishment of the recently introduced biocontrol agents for horehound. Two biocontrol agents were released in the Canterbury region in late 2018 at the conclusion of a highly successful program. Before proceeding with a grant application for a larger project for redistribution we must confirm that the insects have established. Project cost \$25,000, (\$10,000 in kind), we are requesting \$15,000	Horehound is widespread and is recognised as an agricultural production threat, impacting high country dry land areas, often where sheep have been grazed. It is not considered a significant threat to indigenous biodiversity. It is not listed as a pest in the Canterbury Regional Council Pest Management Plan or prioritised for Council management. Staff note the development of biological control for this organism and note the previous contribution from ECan to biocontrol. An industry led approach is supported.	Yes
64	Georgina Waibl	Yes	I support increased biodiversity funding	Support noted.	No
65	Sue-Ellen Sandilands	Yes	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 . I want to see more native birds and plants thriving on the Peninsula. I want to see tui in my garden	Support noted.	Yes
66	Summit Road Society		We support Environment Canterbury's vision to bring about a step change in efforts to halt the decline and restore the natural character of degraded indigenous habitats and ecosystems. Further comments are provided under Revenue and Financing Policy section.	Support noted.	Yes
69	Kay Robertson		I thoroughly support the proposed \$600,000 levy for predator control in Banks Peninsula . I would love to see the Peninsula become a sanctuary for native birds. The efforts of various groups toward this goal need financial support to be effective. I'm very happy to make a small contribution in my rates and want to support these goals.	Indicates support for the Banks Peninsula initiative	No
71	Te Rūnanga o Arowhenua	Yes	We support the ongoing programme on Braided Rivers and submit that ECan continue to seek early input and guidance from Te Rūnanga o Arowhenua on the preparation and implementation of the programme, in particular the development of <i>ki ita ki tai</i> non-statutory management plans for braided rivers. With braided rivers in South Canterbury being under threat from the over-allocation of water supply, greater consultation with Te Rūnanga o Arowhenua and Ngāi Tahu is required to ensure the river systems are protected for future generations.	Environment Canterbury welcomes ongoing opportunities to work with Te Paiherenga and Papatipu Rūnanga on the Braided Rivers Programme, including the development of ki ita ki tai non-statutory management plans for braided rivers. This work is progressing, with the current focus on the generic framework. The first of the plans is due in June 2020.	Yes
80	Kate Whyte	Yes	• I want to see thriving native plant and animal Communities on Banks Peninsula- I 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 . • I ask that the Council programme in this change plus an additional \$400,000 from year 3 onwards of the Long Term Plan. • The Council's funding will provide a foundation upon which other financial contributions can be leveraged. The Council's contribution is critical to securing the additional funding from other partners. • The Council's support for Pest Free Banks Peninsula is a tangible demonstration of the step change in effort for biodiversity. It is consistent with the values and principles to which the Council has committed itself including regional leadership and working collaboratively with the community and partner agencies, including Ngāi Tahu.	Supports. Comments noted. Any increases in funding for year 3 of the LTP (2020 -2021) are likely to be considered by Council in the annual plan process for that year. Environment Canterbury supports Pest Free Banks Peninsula seeking funding from additional partners.	Yes
85	Rod Donald Banks Peninsula Trust		The Trust appreciates ECan's desire to see step change in biodiversity enhancement, and specifically to extend the targeted rate to fund greater control of a wider range of pests on Banks Peninsula. Comments further under Revenue and Financing Policy	Support noted.	Yes
86	Pam Richardson	Yes	What is the new biodiversity strategy? We need to be working with a range of partners, closer collaboration with the Christchurch City Council and Department of Conservation. The Water Zone committees have provided sound opportunities to understand each "partner" including rūnanga. Landowners an important partner to achieve positive outcomes.	Environment Canterbury's commitment to indigenous biodiversity is set out in the LTP.	Yes
87	Te Hapū o Ngāti Wheke		Te Hapu o Ngāti Wheke Inc supports the intention of the draft Annual Plan 2019/20 and are particularly in support of its commitment to the Pest Free Banks Peninsula (including	Support noted.	Yes

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			Port Hills/Te Pataka o Rakaihautu initiative. (comments related to Pest Free Banks Peninsula under Revenue and Financing Policy)		
88	Feral Goat Working Group		The Feral Goat Working Party thanks Environment Canterbury for the \$40,000 allocation for the 2018/19 year for the removal of feral goats from Banks Peninsula. No one party can resolve the issue - we need to all work together. We need to commit to removing feral goats and to do this we need commitment to ongoing funding and support including the enforcement of the Regional Pest Management rules. (See attached submission).	ECan works in partnership with other agencies for managing goats. The RPMP includes objectives for management of goats including a commitment for ECan to take a lead role in working in partnership with the Banks Peninsula Goat Working Group. Pest Free Banks Peninsula working group also has objectives for managing goats.	Yes
89	Ōnuku Rūnanga		Ōnuku Runanga congratulates the Canterbury Regional Council on its commitment to the Pest Free Banks Peninsula (including Port Hills) / Te Pataka o Rakaihautu Initiative. (See attached submission).	Support noted.	No
91	Federated Farmers		Federated Farmers is opposed to the use of rate-payer funds by ECan to pursue its appeal to the Court of Appeal of the High Court judgment on the proper interpretation of the term bed in the context of braided rivers. In addition, from an environmental perspective, we believe it would have been preferable to accept the High Court's view of what constitutes the bed of a braided river and get on with protecting braid plain values via the BRIDGE project and the upcoming omnibus plan change. This course of action would have avoided the potentially lengthy delay, and significant cost and resourcing implications, involved with the appeal process.	Environment Canterbury has a statutory role to prevent further encroachment of braided rivers in Canterbury. The uncertainty in the definition of the bed of a braided river that was raised in the Dewhirst High Court decision is of significant concern to the council in its ability to carry out its statutory functions. The council has chosen to appeal the High Court decision and will await that outcome of the legal proceedings. While the legal process is underway the Council has chosen not to pursue the BRIDGE project through to potential changes to the Land and Water Regional Plan Omnibus plan change. However the Council is open to continuing a collaborative process on hope to manage for braided river values in the future.	Yes
92	Ōpāwaho Heathcote River Network		The OHRN would also like to stress the need for ECan, in collaboration with CCC, to set up a specific programme to reduce the overland sediment flow, from the Port Hills into the Ōpāwaho Heathcote River. All agencies need to work together to enable the continued native revegetation of the Port Hills, the reduction of sediment loss and the subsequent improvement in the ecological health of the river. See attached submission The OHRN would like the Ōpāwaho Heathcote River to be identified as significant and worthy of action. The OHRN would like ECan to provide an analysis of wetlands within the Ōpāwaho Heathcote River catchment and their protection status. The OHRN would like ECan to develop the concept of an ecological corridor along the Ōpāwaho Heathcote River, from the Avon-Heathcote Estuary to the Port Hills. The OHRN wants to have the opportunity to object to the variation to the resource consent on the wastewater overflows into the Ōpāwaho Heathcote River.	ECAN already collaborates with CCC to reduce the overland sediment flow, from the Port Hills into the Ōpāwaho Heathcote River. This is made up of compliance, education, Erosion and Sediment Control Toolbox, research incident response, instant fines, stormwater catchment plans and consenting. It could be enhanced through CCC taking a greater role with small sites and any larger site where ECAN is not responsible for compliances. The local community could also take a greater role by using our environmental incident number and snap, send, solve to let us know when they see sediment issues. A significant untapped opportunity would be for CCC to access the Billion Trees fund (with support from ECAN) to expand gully and erosion planting on the Port Hills. ECAN and CCC already views the Ōpāwaho Heathcote River to be identified as significant and worthy of action. This is why CCC has undertaken significant bank stabilisation and planting work, dredging, and put in the southern hemisphere's largest stormwater filter at Bells Creek. CCC also has a huge programme of work in Cashmere Catchment, which is aimed at improving the Ōpāwaho Heathcote River. ECAN does not manage the waterways in this Catchment but is proactive and collaborative at working with CCC and local community groups and landowners. New wetlands are being created all the time in this catchment as a way of attenuating floodwater, treating stormwater and reducing how much sediment gets to the river. A large proportion of Cashmere Catchment is being used for this purpose. Avon Heathcote Estuary/Ihutai is also a wetland and there are other wetland areas in Ferrymead, Beckenham and elsewhere. Staff invite OHRN to discuss with ECan what can be provided. This is a great concept. ECAN does not manage this waterway or own land alongside it. We already support this concept and would assist with seeing it happen. CCC is also already undertaking plantings in a number of locations along the river. This could be expanded with further funding and time. ECAN have not yet made a decision under the RMA on whether this application should be notified. If the application is notified, the public will have the opportunity to make submissions.	Yes
98	Ashburton District Council		Ashburton District Council officers are involved with the Braided Rivers Action Group project in 2018-19 that is seeking to establish the ownership of land within and on the margins of the large alpine-fed braided rivers. While we note that this project target has been highlighted in grey in the Plan as it was a 2018-19 target we are unclear as to the planned work for 2019-20. We suggest that while the project is valid in its intention, it does seem an almost impossible task to deal with. We have noted the current appeal against ECan's position in the Court of Appeal. We look forward to discussing the future of the project with Environment Canterbury as soon as practicable, as we are unclear about the potential costs to Council. With regard to biodiversity, given the limited resources available to Ashburton District Council, we note and support the reference on page 20 to the need for 'extensive collaboration' and the associated aims.	Environment Canterbury included funding for the Braided Rivers Action Group in the LTP over a two year time frame. While this project is challenging, good progress is being made on the 2018-19 target to establish the ownership of land within and on the margins of the large alpine-fed braided rivers. The work for 2019-20 is currently being planned and agreed by the Group. Regarding the current appeal of the High Court decision related to the definition of a river bed in braided rivers, Environment Canterbury considers that among other things, the decision to appeal is felt to be necessary to ensure clarity for all – including landowners, territorial authorities, communities and river users – on a point of law that has wide-reaching implications and which is central to Environment Canterbury's work in protecting the region's much-valued braided rivers. Environment Canterbury will discuss the implications of the potential outcomes of the appeal with territorial authorities.	Yes
100	Jennifer Porter		I approve of working with Ngai Tahu et al. Pests and nasty plants need more pictorial presentation of easy identification.	Support noted.	No

HAZARDS, RISKS AND RESILIENCE COMMENTS

Submitter ref	Submitter name	Support (Y/N)	Submitter comments	Staff comments	Wishes to be heard
1	Andrew Gilligan	Yes	Yes but I doubt the rate payers cannot afford to meet these costs!	Supports, but expresses concern about rates affordability.	No
2	Anon	No	Regulations and compliance requirements are cancer. They are not carcinogenic, but the cancer itself. The officers play the part of carriers. There is no antidote to them. They multiply and infect companies, grossly inflating costs and expanding start up times. They have no interest in the enterprise save to control it, and they have no responsibility for its success or survival. They will kill it. They are also one cause of cost-push inflation. In a time of recession that squeezes margins and businesses will fail. The compliance officers and regulators will not make the connection between themselves and the failure. The people who employ the regulators must control them and at the moment that is not appreciated. It is irresponsible. They need robust control and oversight (in the American use of the word).	Doesn't support and seems to express concerns about regulations/ors.	Yes
6	Leanne Reid	No	I have no faith in this council or their decision making after their refusal to listen to Canterbury ratepayers re water bottling plant!	Doesn't support, on basis of concerns with water bottling. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No
7	Andrew McKay	No	No focus on global warming and sea level rise.	Doesn't support and expresses concern about lack of focus on climate change.	No
16	Haidee Scott	Yes	I would like to see a more comprehensive plan for addressing climate hazards, but you have to start somewhere!	Supports, but suggests more comprehensive planning on climate hazards.	No
20	Alex Hallatt	Yes	20.1 When are the summer months? I swim in Lyttelton Harbour Nov-April and know plenty of others that do the same, not to mention the surfers who are in the sea all year around. The sediment levels in Lyttelton Harbour are appalling, not natural and should be monitored and improved via LPC controls, stormwater management systems, etc.	Support, but expresses concerns about monitoring and sediment controls in Lyttelton Harbour. Swimming sites in Lyttelton Harbour/Whakaraupō and all other popular beaches are sampled for 15 weeks over the summer from mid November until the end of February. The weekly results provide a measure of water quality at the time of sampling. However, it is the grade based on three years of data (as shown on LAWA along with the weekly results) that should be used by the individual to decide if they wish to swim at a site. This grade applies all year even when there is no weekly sampling. There is also information on LAWA about swimming after rainfall. Re the comments about sediment levels, Environment Canterbury is partner of the Whaka-Ora Healthy Harbour plan with Te Hapū o Ngāti Wheke, Te Rūnanga o Ngāi Tahu, Christchurch City Council, and the Lyttelton Port Company. One of the priority areas of the plan is to reduce sedimentation to waterways in the Whakaraupō/Lyttelton Harbour catchment. (http://healthyharbour.org.nz/).	No
24	Robin Barraclough	No	The plan has no mention of adaptations for climate change / very light on detail regarding the impending hazards from global warming. Neither does the plan mention monitoring and mitigating microplastic harms to human health and the food chain.	Doesn't support and expresses concerns about lack of mention of climate change adaptation and microplastics. Submitter attaches IPCC special report for policy makers on the impacts of global warming of 1.5°C.	Yes
29	Leslie Hogbin	No	I would like to see who is behind the plan, what type of people and their qualifications and experience. Some critical key aspects involved and the public need confidence in who is managing this. Unfortunately, ECAN suffers from a history of failure, fiasco and thus poor 'image' leading to a lack of confidence and credibility.	Doesn't support and questions capability (experience and qualifications).	No
32	Peter McBride	No	waste of time the nanny state is creating a race of zombies	Doesn't support, no specific action requested.	No
35	Steve McNeill	No	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.	Doesn't support and refers to sea level rise and flood management. Suggests district council purchase zones at risk and rent them back.	No
41	Selwyn District Council	Yes	SDC is very supportive of the initiatives outlined in the 2019/2020 Draft Annual Plan for the Waimakariri Regional Park and Emergency Management.	Support noted.	Yes
48	Tim Lockwood	Yes	There is only one thing to say here and that is stop taking a strategic approach and take that strong & collaborative response to central government. Refuse to ignore greenhouse gas emissions effect on climate change when issuing consents.	Supports, but suggests advocating central government and consider greenhouse gas emissions effect when issuing consents.	Yes
72	Alex McNeill	Yes	Urgent action must be taken to adapt to climate change. The sooner we start adapting, the less climate change will impact us. At the same time, mitigation should not be ignored! The less we as a planet increase the global temperatures, the better off we will be.	Supports, but highlights importance of immediate action to adapt to climate change.	No

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86	Pam Richardson	Yes	Once again need to see greater collaboration with CCC and our communities. There needs to be a joined-up approach. We have seen some "working together" with research work - inundation.	Supports, with particular reference to the strength in a collaborative approach.	Yes
98	Ashburton District Council		Ashburton District Council officers are members of the Regional Climate Change Working Group and support the proposed amendments to the measure and targets (page 32 of the Plan), particularly in improving the understanding of the risks (threats and opportunities) to the Canterbury region from Climate Change. We support continued collaborative action to maximise the benefits of sharing knowledge and resources.	Support noted.	Yes
99	Timaru District Council		Timaru District Council recommends that <ul style="list-style-type: none"> 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. 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. 	Council notes TDC request to initiate a plan review and in particular update of coastal hazard lines in 2019/2020 financial year. In order to deliver on freshwater priorities in the planning programme, sufficient resources will not be available to commence a review of the Coastal Environment Plan. Staff will continue to provide technical advice and information on coastal hazards to assist the Timaru District Council with its District Plan review.	Yes
100	Jennifer Porter	Yes	Regarding flood protection - work with City Council to that leaves that block sump drains at intersection after heavy rain. Waimairi Rd/ Kiltie/ Roundtree Streets are unwalkable at times.	Supports but refers to City Council jurisdiction – drain blockage.	No
Late Feedback 102	Waimakariri District Council		Following a joint meeting with Ecan Councillors and WDC Councillors today (9 April 2019), WDC staff and Councillors indicated that an additional \$10,000 has been allocated from WDC to the Ecan Ranger Service for additional presence to enforce the Northern Pegasus Bay Bylaw 2016. Each Ecan Councillor present was provided with a copy of the Northern Pegasus Bay Bylaw 2016 Implementation Plan. The request to the Ecan Annual Plan 2019/20 is that this \$10,000 additional funding from WDC to the Ecan Ranger Service is matched with a concomitant amount from Ecan's budget.	Staff would be happy to sit down and talk with relevant people to discuss matching the \$10k for biodiversity enhancement in the area.	Yes

AIR QUALITY COMMENTS

Submitter ref	Submitter name	Support (y/n)	Submitter comments	Staff comments	Wishes to be heard
1	Andrew Gilligan	Yes	Yes but ecanz do not, increasing the frequency of public transport clearly demonstrates this.	Supports air quality but raises concerns about the impact of public transport on air quality.	No
2	Anon	Yes	Yes but. The Resource Management Act is to blame for a deal of nonsense and it is the responsibility of bodies such as ECan to agitate for repeal of those sections that are untenable. To blindly inflict them is intolerable to everyone's responsibility to society.	Supports, but raises concerns with RMA.	Yes
6	Leanne Reid	No	I have no faith in this council or their decision making after their refusal to listen to Canterbury ratepayers re water bottling plant!	Doesn't support, on basis of concerns with water bottling plant. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No
9	Paul Hamilton	No	More needs to be done to encourage uptake of heating and transport that does not contribute to lower air quality eg electricity from solar/wind power. Why on earth are new homes being built in the region with log burners in them in a developed country!? Last year the region all but ran out firewood in the winter. Incentives and regulations should target and encourage people to use heat pumps, solar energy, electric powered transport (electric or hybrid cars, electric scooters, electric bikes etc).	Doesn't support and suggests more emphasis for renewable energy/heating/transport sources.	No
21	Benjamin Lawrence	No	\$600k decrease seems immaterial considering the overall value of rates. It seems to be playing with the margins. Rate at the standard rate and achieve more sooner...	Doesn't support, on basis of funding decrease. Suggests rating to achieve more sooner.	No
24	Robin Barraclough	No	The plans do not mention of monitoring NOx levels and or particulates, which evidence shows are strongly linked to low birth weight and prematurity, respiratory disease (asthma), heart disease and dementia.	Doesn't support, and expresses concern about lack of monitoring of NO, particulates and health impacts. We have monitoring for particulates and NOx under activity of Level of Service 28.	Yes
32	Peter McBride	No	again waste of time if you really believe in air quality why not flatten the port hills to create airflow.	Doesn't support.	No
35	Steve McNeill	Yes	Fees for burner installation seem to be on a licence to pollute basis.	Unclear what fees the submitter is referring to. Could be territorial authority building consent.	No
48	Tim Lockwood	No	The tag line is the key to understanding what is missing. Air quality effects all sections of this plan that EC are putting forward. Whilst our health & wellbeing are not trivial matters in themselves there is a lack of air quality reference in regard to climate change as it's detrimental effect on all things. Your plans have been flawed to date by the lip service paid to it by resource consent. There is no evidence to show this will change any time soon considering the 3 liner on industrial emissions that is greater in certain zones than domestic. Combating domestic emissions seems to be the purpose of this draft even though there have been massive gains in this area and	Doesn't support and expresses concern with resource consenting and industrial emissions.	Yes
64	Georgina Waibl	Yes	I support reducing air quality funding to offset increases in other areas	Supports, reduction in funding to enable increases in other areas.	No
72	Alex McNeill	Yes	I'm glad that air quality is apparently not a huge concern anymore and that the current funding is seen as acceptable at the moment. I hope that with more carbon-neutral technologies coming into play (e.g. electric buses), air quality issues will become less of a concern.	Supports, and indicates that the level of funding is appropriate. Hopes that more carbon-neutral technologies will also help.	No
74	Michelle Laing	No	I do not understand why people out of the clean air zone can burn polluting fires - there is 1 atmosphere around the earth - where ever you put pollutants into it will damage the atmosphere. The current policy looks after isolated areas of air pollution without looking at what is affecting peoples health in the wider environment.	Doesn't support and expresses concerns about pollutants being burned outside of clean air zones.	No
77	Red Bus	Yes	Red Bus suggest that the air improvement benefit from the RPTP planned transition to a zero emission fleet for urban passenger transport be added into the Air Quality section to reflect the broader impact of public transport on the Canterbury air shed.	Staff note that air quality section could demonstrate linkages to other portfolios. This feedback will be considered in drafting of the Long-Term Plan 2021-31.	Yes
83	Bernard Wilkins	Yes	Electric and solar preferred	Supports, and suggests electric and solar.	No
98	Ashburton District Council		Ashburton District Council is pleased to see that the number of days in Ashburton with PM10 exceeded have steadily reduced over the past ten years. We support the continued monitoring and enforcement of air quality in Ashburton District throughout the year. <ul style="list-style-type: none"> •Council believes that there is a need for ongoing education around smoke management and avoidance of nuisance to continue these favourable air quality trends. •We note that the expenditure on Air Quality in the draft Annual Plan is 19% lower than the LTP. We oppose this reduction if the result is a reduced level of service for our residents from the current standards. •With regards to Non-Domestic Emissions (page 45), there are concerns expressed about rural stubble-burning from our urban residents. We believe that more could be done in this area by Environment Canterbury with regards to education and enforcement. 	There will be some reduction in the levels of service for the Ashburton district as a result of the proposed budget reduction. There was an 8 week programme last year providing education, better burning and home heating advice which will not be continued. Low income grants will still be available along with the Good Wood merchants programme, airshed monitoring, outdoor burning campaigns and smoky chimney complaints thru the incident response call line. Healthier Home Canterbury loans remain available to all Canterbury.	Yes
100	Jennifer Porter	Yes	Could not find this - now I have !! Your telephone enquiry service is excellent!	Supports. Feedback sent to customer services team.	No

TRANSPORT AND URBAN DEVELOPMENT COMMENTS

Submitter ref	Submitter name	Support (Y/N)	Please provide any comments below	Staff comments	Wishes to be heard
1	Andrew Gilligan	No	<p>A 3.0% proposed increase on public transport funding to increase the frequency is not needed, what is needed is buses at busy times and less busts at off peak. An overall frequency approach is not needed. Lets see the present occupancy numbers that justify an increase. I see daily, buses with a high number of empty seats, away from peak travel times, increasing the frequency will at best spread the off peak occupancy. This will give little reward and only increase the cost to rate payers.</p> <p>I would like to see this become a rate payer vote!</p> <p>A 2.4% for inflation, which takes account of increasing operating costs including fuel prices. I very much doubt ecanz could predict this, rather a stab in the dark at best?, given most top shelf NZ economist can not do this.</p> <p>Nice try ecanz but does this now mean an annual inflation on fuel costs that may never happen and if it does not happen then the rate payers will receive a credit for a at best stab in the dark prediction?</p> <p>Correct me if I am wrong but a rate is exactly that, an actual cost, not a stab in the dark.</p> <p>If you feel it is going to happen then prove it with facts backed with the stats that say inflation will be X.</p>	<p>Doesn't support and suggests that the proposed increase is not needed, and a public vote is needed. We have sought public's comment on this through this feedback process.</p> <p>Increasing frequency has been identified as a key to delivering significant growth in the public transport network. Higher frequency services attract patronage and deliver better transport outcomes for all road users and ratepayers. The proposed funding increase takes into account the desire to begin improving frequency.</p> <p>The funding increase proposed also acknowledges the inflationary costs of running existing services, as things like fuel prices and labour costs rise. As an example of this, the New Zealand Transport Agency year-on-year indexing of costs of providing passenger transport services increased by between 2.5% and 5.2% for each of the quarters since March 2017. This shows that the costs of providing existing services has increased and would need to be matched unless cuts to services were considered.</p>	No
2	Anon	Yes	<p>Absolutely not. This is the third time I have heard that more money is to be put into the buses of Christchurch. The current structure, of which ECan is part, must be seen as a corrupt structure. And when it is widely seen as a corrupt structure ECan will rightly find itself in the dock.</p>	<p>Doesn't support and refers to increased funding.</p>	Yes
4	Rob Woods	No	<p>(1) It is unclear exactly how the additional revenue will be spent. The introductory statements suggest rates are being increased to match NZTA increases, which sounds positive, but does not indicate what for. The public transport pages in the draft don't mention this but provide a somewhat vague indication that it is to cover the shortfalls previously funded by reserves, which is less than positive. For the increases involved a little more detail would be reasonable.</p> <p>These pages do not explain what will happen, if anything, to service levels during the year, or what will be delivered aside from the services, in 2018/19. The LTP is no more informative.</p> <p>(2) Linked to this it is not clear when the fare structure will be reviewed, as indicated in the new RPTP, which signals sometime in the 2018-21 period. I suggest this is of utmost urgency. The current fare structure was put in place in 2004 or so and since that time there has been major land use change and associated changes in travel patterns. The current fare structure is inequitable for shorter trip makers, acts as a disincentive for central city trip making (at a time when it needs it) and is acting as a handbrake on total fare revenue. A comparison between Auckland, Wellington and Christchurch of dollars charged per km travelled by bus would be informative in a number of ways, not least how passengers are paying well above other cities and the relevant total costs of operator contracts.</p> <p>A finer grain zonal structure that aligns better to travel distances should be investigated for its potential to stimulate shorter trips (especially to the CBD), more fairly allocate total costs to trip distances and increase overall fare revenue.</p>	<p>Doesn't support and expresses concerns about lack of information about how money will be spent. Also suggests that the fare structure is reviewed urgently and provides reasons for this review.</p> <p>The Canterbury Regional Transport Plan, consulted on in late 2018 and subsequently adopted by Environment Canterbury, signalled a proposed gradual increase in frequency on core routes in Christchurch and lifting the number of services that can be classed as "core" from the current five routes to nine routes. Other Christchurch services will also see improved service levels and replacement of outdated systems (such as real time information and bus tracking), while in Timaru changes to service structures are needed, to match community expectations and service typology. RPTP implementation is proposed to be delivered across the 10 years between 2018 and 2028.</p> <p>The proposed funding increase takes into account these improvements and the inflationary costs of running existing services as fuel prices and labour costs rise.</p> <p>The RPTP also includes a fare review which is intended to be consulted on in the 2019/20 financial year.</p>	No
5	David Allan	No	<p>The cost increment of 3% associated with this portfolio is unacceptable.</p>	<p>Doesn't support and refers to funding increase.</p>	No
6	Leanne Reid	No	<p>I have no faith in this council or their decision making after their refusal to listen to Canterbury ratepayers re water bottling plant!</p>	<p>Doesn't support, on basis of water bottling concerns. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/</p>	No
7	Andrew McKay	No	<p>Leave urban development to the local district and city councils. Butt out.</p> <p>As for transport, this has failed. Give up trying and pass to the district and city councils.</p>	<p>Doesn't support, suggests local district and city councils should deal with urban development and transport.</p>	No
8	Richard Gray	No	<p>I think ecan should strongly consider making the buses free and incorporating a levy into the rates. I have spent a lot of time thinking about this. Increasing the fees is not going to help when numbers are already down. It's disappointing to see empty buses driving around, costing money and adding to pollution for not purpose. I do not use the bus for a number of reasons, but I don't know how much it costs, all I know is that it is not much cheaper than taking my car, yes my car is more comfortable and convenient. If the bus was free and I could get on at any time I would use it a lot more and would expect others would. Alternatively to a rates levy could be a local petrol tax similar to Auckland's. Those who choose to use their car</p>	<p>Doesn't support and suggests buses should be free, incorporating a levy into the rates or creating a local petrol tax rate.</p> <p>Current Government policy expects that users contribute something to offset the costs of service. Current fares rates in Christchurch and Timaru compare favourably with other urban centres in New Zealand. Free fares would result in a considerable additional impost on rates and would be unpalatable to many ratepayers.</p> <p>Environment Canterbury is legally unable to levy a fuel tax. Regional fuel tax legislation introduced last year is specific to the Auckland region only.</p>	Yes

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			can subsidise those who take public transport. I know there are a number of issues to consider - what extent of the bus network would be free, i.e Selwyn and Waimakariri districts may be excluded. Airport bus etc. But I believe that providing the public transport for free would be a great feature for Christchurch to reduce our reliance on cars and fill the buses which are all too often driving around with only a handful of people on them. A petrol tax of say 5c per litre would mean that for every full tank, would cover one persons fare. I would expect ecan would raise more money than their current model, giving them more funds to develop the service. I would be very interested to hear your feedback on this.		
9	Paul Hamilton	No	The objectives are vague and there needs to be more of a focus on sustainability and environmental impacts of current transport methods. Public transport should be getting a huge push in the region, sustainable electric powered transport options (electric cars, e-scooters/bikes) should be the priority, where is the ambitious hub and node 10 year commuter rail plan for the city that will set it up to be a city of the future. Look at Auckland's folly at not planning for the future and the huge transport issues (and costs) that now plague them. I implore Canterbury not to follow the same path. In the words of John Key - get some guts on this issue and be inspirational and aspirational as a region in the area of transport.	Doesn't support and suggests more focus on sustainability and environmental impacts. Support for public transport is noted. The Canterbury Regional Transport Plan, consulted on in late 2018 and subsequently adopted by Environment Canterbury, signalled a proposed gradual increase in frequency on core routes in Christchurch, with other Christchurch services also earmarked for improved service levels. The RPTP also proposes a transition to zero emission vehicles. Rail is being considered alongside other options as part of the Future Public Transport Business Case process being undertaken in partnership with all greater Christchurch councils and the New Zealand Transport Agency. The proposed funding increase in the draft annual plan takes into account these signalled improvements and the inflationary costs of running existing services as fuel prices and labour costs rise.	No
10	Graham Tate	No	There is an implied obligation for public transport to be accessible where areas of need are concentrated. Re-routing the Orbiter bus away from Philpotts Rd left residents and staff at Diana Isaac Retirement Village without an accessible bus. This was despite a petition presented in 2018 signed by over 600 persons urging ECAN to meet this need. ECAN must recognise its obligations when curtailing access.	Doesn't support and refers to the re-routing of the Orbiter. Environment Canterbury undertook a comprehensive consultation process with the Mairehau/Philpotts Road community that indicated that running a bus service through the suburb to provide a service to Diana Isaac Retirement Village was not supported by the surrounding community. We further explored options of working with the retirement village to provide a level of subsidised transport and this offer was not taken up by community and management. Given the lack of support, Environment Canterbury has taken the only option available at this point, having routed the Orbiter service along Innes Road and Cranford Street, the nearest designated collector roads in the area.	No
14	Amy Carter	Yes	An efficient and user-friendly public transport network is essential for Christchurch to be a prosperous and environmentally sustainable city. It's great to see an increased focus here but I feel that the current systems it needs a fundamental overhaul. The procurement model set by government is not delivering the outcomes we need, it is instead driving down the service offering and does not allow at all for innovation. Additionally, we need to market public transport, jumping on the back of the millennial and expats returning who don't deem a bus as a looser cruiser!	Supports, and refers to the increased focus but suggests and overhaul of the current systems and more innovation. Support for public transport is noted. The Canterbury Regional Transport Plan, consulted on in late 2018 and subsequently adopted by Environment Canterbury, signalled a proposed gradual increase in frequency on core routes in Christchurch, with other services also earmarked for improved service levels. RPTP implementation is proposed to be delivered across the 10 years between 2018 and 2028. The proposed funding increase takes into account these signalled improvements. As the submitter correctly notes, the procurement model is set by central government and is one that Environment Canterbury must work with if we are to access appropriate funding from the New Zealand Land Transport Fund to offset our local share.	No
15	Douglas George	Yes	We appreciate the new bus service and route which allows us to easily travel to the city center from our home in Westmorland.	Supports, and refers to Westmorland service.	No
16	Haidee Scott	Yes	I would like to see more investment into communication, engagement and promotional activities (including internal communication in the form of customer service training for drivers) with the intention of increasing public transport patronage. Unfortunately, the existing procurement model (and potentially the upcoming application of PTOM) does not presently incentivise operators to invest in such activities - but if a true partnership between providers is to exist, with the intention of increasing patronage, this needs to change.	Supports, but would like more investment into communication, engagement and promotional activities to increase patronage. Provisions of both the recently adopted RPTP and in existing and future contracts with service providers include processes for ongoing training of drivers and customer service representatives. Environment Canterbury is also continuing to invest in and develop, our communication and marketing strategies and tools	No
18	Rob Haughey	Yes	Would like to see long term goals for electrification of busses or light rail transport or bus and ride from Waimak to city.	Supports, but suggests more electrification, light rail or bus and ride options. Support for public transport is noted. The Canterbury Regional Transport Plan, consulted on in late 2018 and subsequently adopted by Environment Canterbury, signalled a proposed gradual increase in frequency on core routes in Christchurch, with other Christchurch services also earmarked for improved service levels. The RPTP also proposes a transition to zero emission vehicles. Rail is being considered alongside other options as part of the Future Public Transport Business Case process being undertaken in partnership with all greater Christchurch councils and the New Zealand Transport Agency. The proposed funding increase in the draft annual plan takes into account these signalled improvements.	No

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20	Alex Hallatt	Yes	Great to see more support for bicycles and electric vehicles (including Lime). I am a cyclist and user of Yoogo car share. I'd like to see better pedestrian priority in urban areas, especially in the centre of town where pedestrians/cyclists should have more crossing time and private cars should be discouraged. The bus is great, where we have one. When the Sumner road opens, it would make sense to have a service that linked Sumner to Lyttelton.	Supports, but would like more pedestrian priority in urban areas. Also suggests service between Sumner and Lyttelton. Service reviews over coming years will consider the demand for and suitability of future routing options. These will be consulted on and evaluated at this time.	No
23	Arthur McGregor	Yes	I especially support an increase in rates to improve the quality of public transport in Christchurch	Supports increase in funding.	No
24	Robin Barraclough	No	Efforts in public transport are pleasing. But in the bigger picture there is no mention of policy pushing for decarbonisation.	Doesn't support, although notes efforts are pleasing but wants more on decarbonisation. Reduction of carbon emissions are covered in the Canterbury Regional Public Transport Plan which was revised in 2018 https://www.ecan.govt.nz/your-region/living-here/transport/public-transport-services/ .	Yes
29	Leslie Hogbin	No	Until ECAN can work with the city Council this cannot work. The city centre under ECAN's leadership is terrible-why is the centre not traffic free?	Doesn't support and refers to ECan/CCC work. Environment Canterbury and partner agencies are working together to deliver public transport to great Christchurch through the Public Transport Joint Committee. This is a formal collaborative arrangement between us, Christchurch City Council, Selwyn District Council and Waimakariri District Council, with both the New Zealand Transport Agency and the Canterbury District Health Board closely involved and with speaking and decision-making input. This group has recently worked together to help produce the Canterbury Regional Public Transport Plan, which will be a blueprint for the delivery of better public transport in the region over the next 10 to 30 years. Environment Canterbury will continue to support the Joint Committee and will continue to collaborate with our partners to produce improved outcomes for public transport in Greater Christchurch. Decisions on roading are not part of the mandate of this joint committee or of Environment Canterbury. They are consideration for the Christchurch City Council.	No
32	Peter McBride	No	it does not matter who manages this dinosaur system BUT one only should have responsibility for the entire edifice .. split management is a recipe for do nothing for ever.	Doesn't support and refers to responsibility confusion. Environment Canterbury and partner agencies are working together to deliver better transport outcomes for Canterbury through a number of collaborative arrangements including the Canterbury Mayoral Forum, the Regional Transport Committee, the Greater Christchurch Partnership and the Greater Christchurch Public Transport Joint Committee.	No
35	Steve McNeill	No	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.	Doesn't support and refers to hubs and spokes, and fare prices. Suggests more user-friendly and convenient bus system. No alternatives suggested. The Canterbury Regional Transport Plan, consulted on in late 2018 and subsequently adopted by Environment Canterbury, signalled a progressive refinement that does not focus on hubs and spokes. The RPTP proposes gradual increases in frequency on core routes in Christchurch with other services also seeing improved service levels over time. The changes signalled in the new RPTP are geared to deliver outcomes that support growth in the central business district, intensification and land use planning throughout greater Christchurch.	No
38	Bus Go Canterbury	Yes	Please when considering the Transport funding look to provide the additional funding required to keep both the 86 Darfield and 87 Leeston Bus Services having strongly advocated to get these services on the road they need to be kept for the greater community good for these rural communities	Supports, and requests additional funding to keep the 86 Darfield and 87 Leeston Bus services. Support for new services in Selwyn District has been noted. Selwyn District Council has provided funding to support the provision of trial public transport services for Darfield and Leeston in its current year expenditure. This has allowed the services to be operated and monitored and will facilitate an assessment of their relative merits, with the expectation that Environment Canterbury would provide ongoing funding for these services if they prove successful. Based on patronage uptake to date, it is likely that staff will be recommending the continuation of the Darfield service only.	Yes
41	Selwyn District Council		SDC supports the new 2018 Regional Passenger Transport Plan and the progressive improvement to public transport services over time. With a bus services route review pending for the district by Environment Canterbury, it is the best time to discuss how to sensibly improve and expand Selwyn bus services and how increasing the public transport rate in Selwyn could assist in achieving this.SDC views the introduction of public transport services into its new high growth urban areas like Rolleston and Lincoln as very important to change travel behaviours from the outset. <ul style="list-style-type: none"> •SDC asks Environment Canterbury to investigate extending the 820 service from Lincoln to Tai Tapu and Halswell to service the Tai Tapu area of Selwyn – even if this requires a further increase in the Selwyn Public Transport rate. •SDC supports Environment Canterbury amending the Leeston Trial, perhaps re-routing via Rolleston to check demand versus costs of a shorter service. •SDC asks Environment Canterbury to consider adding Southbridge to the Leeston service and rating Southbridge according •SDC supports the increases in Regional Public Transport rates as required to implement the Regional Public Transport Plan. 	Support for services in Selwyn District has been noted. Selwyn District Council has provided funding to support the provision of trial public transport services for Darfield and Leeston in its current year expenditure. This has allowed the services to be operated and monitored and will facilitate an assessment of their relative merits, with the expectation that Environment Canterbury would provide ongoing funding for these services if they prove successful. Based on patronage uptake to date, it is likely that staff will be recommending the continuation of the Darfield service only. Other services in Selwyn District will be all reviewed in 2019/20. This will look at what changes can be made to services within the current funding envelope. The service review process may also provide an opportunity to consider and consult on the timing of any future improvements, and to establish the degree of community support to fund changes in the local network. Following the submission in person by Mayor Sam Broughton, staff are now recommending that funding for both the Darfield and Leeston trial services is provided in the 2019/20 financial year. This funding could allow for different service configurations to be trialled over the year, as Mayor	Yes

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			<ul style="list-style-type: none"> •SDC supports increases in Selwyn's local Public Transport rates to support the continuation of Darfield and Leeston services trials. •SDC asks Environment Canterbury to consider further increases in Selwyn Public Transport Targeted Rate to support further increases in services in the Selwyn area, such as a second Darfield &/or Leeston Bus service or an increase of the Yellow Line service or 85 service coverage within Rolleston. 	<p>Broughton advocated, such as the Leeston service only running to Rolleston instead of the whole way into central city.</p> <p>Mayor Broughton also advocated that Southbridge be included in the Leeston trial service, and to do this staff recommended that the rating area for this service is extended to include Southbridge. Note that Southbridge residents were not consulted on this through the Annual Plan process as residents of Leeston were. If Southbridge is included in the rating area the total revenue sought from will remain the same but will be split across a greater number of households.</p>	
48	Tim Lockwood	Yes	There could be more innovation here such as banning use of drinking water for use on gardens by providing rain harvesting systems.	Supports, suggests innovations not in scope of public transport.	Yes
61	Frank Hill	No	Ecan are not competent to manager transport in this city.	Doesn't support.	No
64	Georgina Waibl	Yes	I support increased funding to take advantage of central government funding	Supports, increased funding.	No
72	Alex McNeill	Yes	Public transport is a top priority for a carbon-neutral, climate-friendly region. I support the increase in rates to help fund our public transport system. It is very useful as it stands, but can always be improved. I firmly believe that increased use of public transport benefits everyone, not just those who use it, so I disagree with increasing fares to help fund buses, ferries. Using rates to help pay is the way to go. Thank you for taking this stance; I look forward to seeing more great innovations like Wi-Fi, electric buses, auto-topup, etc.	Supports increased funding for continuous improvement and using rates to help pay.	No
77	Red Bus	Yes	In Red Bus's view the public transport funding proposed in this Annual Plan is the minimum necessary. A significant increase in funding is a critical first step to lift the public transport fund out of the red and to support the achievement of the RPTP initiatives in order to deliver the desired community benefits. We believe the recovery of the central city and stabilisation of the broader transport network alongside recent transport technology developments sets the scene for a reinvigoration of public transport, but will require a range of interventions that necessitate ongoing investment. We would like to see more funding allocated. Red Bus fully supports the Annual Plan's commitment to fund the recovery and growth of public transport by investing in improved customer service using new technologies such as electric buses, higher service frequency and improved customer experience. Please refer to the attached written submission	Supportive submission – need to ensure that comments on including the PT shift to zero emission fleet be included in the air quality consideration are addressed in future long-term plan discussions.	Yes
83	Bernard Wilkins		I think charge for use of Cranford Motorway - or use Park and Ride or free (almost) buses to and from Rangiora for peak times commuting.	Refers to road toll or park and ride facilities. Park and ride is a consideration included in the Regional Public Transport Plan and we are supporting Waimakariri District Council who have allocated funding for a park and ride investigation in their draft Annual Plan 2019.	
87	Te Hapū o Ngāti Wheke		Te Hapū o Ngāti Wheke understand that there are financial constraints for the Council for the previous Rāpaki bus service. However, they still request that funds are made available to rethink and redesign this bus route. Te Hapū o Ngāti Wheke considers a peak service to and from Eastgate appropriate, with half hourly services during commuting times (i.e. 7.30-10.30am from Rāpaki, 2.30-5.30pm from Eastgate), and a reduced frequency during the off-peak times. (see attached submission).	Service changes to the 535 bus route were proposed during consultation on the Long Term Plan last year. Patronage on this service at the time did not justify the level of service and it was subsequently reduced following Long Term Plan consultation. No additional funding is currently available.	Yes
96	John McKim	No	Light rail please	Doesn't support and requests light rail. The annual plan includes provision to further fund the Greater Christchurch Future Public Transport Business Case. The business case process will determine the pace and style of future investment in public transport in the sub-region.	Yes
99	Timaru District Council	Yes	Timaru District Council - 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. (see attached submission).	Environment Canterbury is grateful for the support from Timaru District Council on the demand responsive transport project as it has progressed through the feasibility study stage. We look forward to working with the council should we move to implement the recommendations from the feasibility study, and this will include close liaison in developing any transition plan and supporting the needs of our existing customer base.	Yes
100	Jennifer Porter	No	<ol style="list-style-type: none"> 1. Too much urban development on prime agricultural land 2. Bring back the intra-city free electric bus 	Doesn't support and raises concern about urban development on agricultural land. Also suggests bringing back the inner-city shuttle. The recently completed Regional Public Transport Plan included provisions to consider the re-introduction of some form of inner city shuttle. This will be considered when services within Christchurch city are reviewed in the next few years.	No

OTHER ANNUAL PLAN COMMENTS

Submitter ref	Submitter name	Support (Y/N)	Submitter comments	Staff comments	Wishes to be heard
1	Andrew Gilligan	No	Out of touch, out of control!	Doesn't support, no specific action requested.	No
2	Anon	No	ECan must step back and check its policies, worth and benefits, because from a certain light it is wealth-draining parasitic and monopolistic and as I have said above it is involved in (or conniving in) what could be called corrupt practices.	Doesn't support, raises general concerns about leadership/practices	Yes
3	Arpad Nagy	Yes	Looks like a well tough plan, but I'm not completely convinced about all aspect of it, especially the fee increase for many reason.	Supports, but concerns about rates affordability.	Yes
5	David Allan	No	There appears to be a disconnect between local authority expenditure and the challenges of finding that money. At some point ECan must constrain its budget so overall increases are in line with inflation. Most of us survive on 1 - 2% annual increases in income. Unfortunately increases like this will ultimately force people out of their homes.	Doesn't support, concerns about expenditure above inflation and affordability.	No
6	Leanne Reid	No	I have no faith in this council or their decision making after their refusal to listen to Canterbury ratepayers re water bottling plant!	Doesn't support on basis of concerns of water bottling. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No
7	Andrew McKay	No	See above	Doesn't support for reasons already stated.	No
9	Paul Hamilton	Yes	But for an environmental entity/agency you are drastically lacking in consideration for the actual environment and ambition in how to resolve the serious environmental issues plaguing the region like water resources. Ecan needs to be less focused on the mindset of "how do we get maximum economic value from the enthronement" and more "how do we manage and protect our environment alongside human industry so as to preserve the environment for future generations". You should be the advocate and voice of the environment, not a pimp to its plunder and devastation. That requires standing up to those causing the most damage to it, regardless of what the status quo is, what family they come from, what school they went to, how angry their voice is when they get themselves in the media as an antiquated stereo-typical "kiwi".	Supports, but expresses concern about lack of action on environmental issues and economic balance.	No
24	Robin Barraclough	No	Probably the single greatest area of omission is the lack of planning to decarbonise. With the changes that must come; socially and economically from this move (as it does present great opportunities) many other areas of environmental policy will be lifted too. See attached IPCC report from 2018	Doesn't support and expresses concern about lack of emphasis on decarbonisation.	Yes
29	Leslie Hogbin	No	The cost of the rates rise is way too high for the people paying for the plan who have wage rises around 2%. The plan could be 'sold' on added benefits but i don't see any. ECAN has a terrible track record of non-achievement and needs to rectify this before asking for more funds...most people would simply vote to remove the organisation completely.	Doesn't support and raises concerns about rates affordability and outcomes.	No
32	Peter McBride	No	should not exist at all	Doesn't support.	No
35	Steve McNeill	No	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.	Doesn't support and raises concerns about planning, monitoring and enforcement and poor planning in LTP.	No
61	Frank Hill	No	An 8.9% increase is an absolute joke and shows once again how out of touch and aloof this council are from the ratepayers. Looks like we will be replacing the elected members also in October! We funded around a 20% (\$5.5M) increase in the CWMS last year. To add another roughly 10% is an insult to the people of this city who are getting zero benefits from the CWMS. Noting their have been zero achievements - then increased funding should match - ie zero. Funding should be provided to Aotearoa Water matching what ECAN is spending on Solicitors - noting they have got the issuing of water bottling consents completely wrong. Shameful that this council is having to fight its own ratepayers in court. No accountability is being shown	Doesn't support and raises concerns about the rates increase and benefits of CWMS to city residents. Notes water bottling concerns. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No
71	Te Rūnanga o Arowhenua	Yes	Generally support the draft Annual Plan 2019/20 particularly with regard to matters which put the Te Mana o te Wai and the needs of water bodies first.	Support noted.	Yes
86	Pam Richardson	Yes	It is good to see the biodiversity focus being raised. Biosecurity needs also to be raised. The greatest threat of our biodiversity is weed invasion e.g. garden escapee pests, possums, deer, goats.	Supports, particularly focus on biodiversity.	Yes
87	Te Hapū o Ngāti Wheke	Yes	Te Hapu o Ngati Wheke Inc supports the intention of the draft Annual Plan 2019/20 and are particularly in support of its commitment to the Pest Free Banks Peninsula (including Port Hills)/Te Pataka o Rakaihautu initiative. (see attached submission).	Supports, particularly focus on biodiversity.	Yes

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92	Opāwaho Heathcote River Network	Yes	The Opawaho Heathcote River Network supports the ECan Annual Plan but there are 3 areas that we would especially like to see more action for the Opawaho Heathcote River;	Supports, and make three specific requests.	Yes
97	Gabi Popa		I definitely do not agree with the fact that the rates go up each year, they should in fact go down. I consider that the Council should optimise their expenses in order to not increase these rates. In my view the buildings like the new Central Library and the new Environment Canterbury building are too big/too costly to run/too unnecessary/too dangerous from an Earthquake perspective buildings. A lot of money from people went into these too big buildings in the Death zone. I actually think that Environment Canterbury spends a lot of money on changing the bus numbers/bus timetables/ bus colours when in fact this city is full of insects who can spread diseases and can come into people's homes from the public land. I saw in the newspapers that the Council asks people to be careful with water, as there is not a great supply of water in summer. I think that a lot of water runs because the culture in New Zealand is to leave the washing machine tap on instead of turning it off when the washing machine is not used and you should educate people to turn this tap off. The rates will go up by 5%, from what I was informed, which is too much because it is above the New Zealand inflation level of 3%.	Submitter to CCC, doesn't agree with rates rise year on year. Refers to ECan building, bus changes as unnecessary spend when there are concerns with insects.	Yes
100	Jennifer Porter	Yes	What great progress has been made since the smoggy days of the 20th Century.	Supports, and refers to progress made in Air Quality	No
19	Anon		I would like my Ecan rates adjusted to reflect details below provided by ECan staff email	Staff advice is captured under the note on river rating changes.	
72	Alex McNeill		Hope you're taking care of yourselves after Friday 15th. Kia kaha.		

FEES AND CHARGES POLICY CONSULTATION COMMENTS

Proposed new charge for non-compliant incident response					
Submitter ref	Submitter name	Support (Y/N)	Submitter comment	Staff evaluation	Wants to be heard?
1	Andrew Gilligan	No	Out of touch, out of control!	No specific points raised in relation to the Fees and Charges Policy.	No
2	Anon	No	It's just another tax. Another revenue gathering exercise. The court is the place a miscreant is punished, not by a regulator. You are not a court and it is perverted of you to think of yourself as one. You must stand back and look at yourself.	Responding to incidents of potential environmental harm and breaches of the regional rules or the Resource Management Act is the role of the Regional Council. Where a breach of a rule or a breach to the RMA has been determined to have occurred a fine and/or prosecution via the courts may occur. The proposed charge is to recover the Council costs in completing its inspection against the offender rather than the costs being born by the rate payer.	No
3	Arpad Nagy	No	I have not found relevant information in the draft about this question. Please let me know where can I do.	Information was provided as part of the consultation process.	No
6	Leanne Reid	No	I have no faith in this council or their decision making after their refusal to listen to Canterbury ratepayers re water bottling plant!	Doesn't support on basis of concerns of water bottling. No specific points raised in relation to the Fees and Charges Policy. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No
7	Andrew McKay	No	Full costs should go to offenders.	Agree. The proposed charge is to recover the Councils cost of inspecting a breach to a regional rule or the Resource Management Act from the offender rather than the costs being born by the rate payer.	No
9	Paul Hamilton	Yes	And this should be at the maximum threshold	The level of this proposed charge is set to recover the actual and reasonable costs of the council in carrying out an inspection of the potential breach to a regional rule or the Resource Management Act.	No
18	Rob Haughey	Yes	The council should recover full costs for the service they provide. This charge should further ensure compliance.	The level of this proposed charge is set to recover the actual and reasonable costs of the council in carrying out an inspection of the potential breach to a regional rule or the Resource Management Act.	No
32	Peter McBride	No	again nanny state is invading our ability to function as human beings	Responding to incidents of potential environmental harm and breaches of the regional rules or the Resource Management Act is the role of the Regional Council. Where a breach of a rule or a breach to the RMA has been determined to have occurred a fine and/or prosecution via the courts may occur. The proposed charge is to recover the Council costs in completing its inspection against the offender rather than the costs being born by the rate payer.	No
98	Ashburton District Council	Yes	Ashburton District Council supports the recovery of costs for non-compliant incidents response. We believe that it is important that the natural resources of our region are managed well for both current and future generations. We note that it is unclear what the minimum charge may be in this situation but would encourage this is set at a level that has a deterrent effect.	Agree. The proposed charge is to recover the Councils cost of inspecting a breach to a regional rule or the Resource Management Act from the offender rather than the costs being born by the rate payer.	Yes
Proposed new charge for annual water consent compliance charge					
Submitter ref	Submitter name	Support (Y/N)	Submitter comment	Staff evaluation	Wants to be heard?
1	Andrew Gilligan	No	Out of touch, out of control!	No specific points raised in relation to the Fees and Charges Policy.	No
2	Anon	No	It's just another revenue gathering exercise, like waste management fees.	The proposed charge is targeted to recover the costs incurred by the Council in managing the receipt, verification, compliance check, reporting, managing and maintaining of water use data from the water consent holders who are required to provide the data as evidence of compliance with the consent. Our community expects that we have the systems and processes in place to ensure that water permit holders are complying with water take limits and that we can report both compliance with limits and quantities of water taken by users across the region. Current levels of charging for managing water use data via the staff hourly charge out rate are not sufficient to recover the costs of this key compliance function.	Yes
3	Arpad Nagy	No	Same as above I went through a couple of times now....	Information was provided as part of the consultation process.	Yes
6	Leanne Reid	No	I have no faith in this council or their decision making after their refusal to listen to Canterbury ratepayers re water bottling plant!	Doesn't support on basis of concerns of water bottling. No specific points raised in relation to the Fees and Charges Policy. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No
7	Andrew McKay	Yes	More data and more transparency is need. Consistency of monitoring is needed.	The proposed charge is targeted to recover the costs incurred by the Council in managing the receipt, verification, compliance check, reporting, managing and maintaining of water use data from the water consent holders who are required to provide the data as evidence of compliance with the consent. Our community expects that we have the systems and processes in place to ensure that water permit holders are complying with water take limits and that we can report both compliance with limits and quantities of water taken by users across the region. Current levels of charging for managing water use data via the staff hourly charge out rate are not sufficient to recover the costs of this key compliance function.	No

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9	Paul Hamilton	Yes	This is a no-brainer and an absolute minimum that can be done to start improving the appalling management of the regions water resources.	The proposed charge is targeted to recover the costs incurred by the Council in managing the receipt, verification, compliance check, reporting, managing and maintaining of water use data from the water consent holders who are required to provide the data as evidence of compliance with the consent. Our community expects that we have the systems and processes in place to ensure that water permit holders are complying with water take limits and that we can report both compliance with limits and quantities of water taken by users across the region. Current levels of charging for managing water use data via the staff hourly charge out rate are not sufficient to recover the costs of this key compliance function.	No
12	Michael Will	No	Farmers are the biggest polluters, charge them.	The proposed charge is targeted to recover the costs incurred by the Council in managing the receipt, verification, compliance check, reporting, managing and maintaining of water use data from the water consent holders who are required to provide the data as evidence of compliance with the consent. Our community expects that we have the systems and processes in place to ensure that water permit holders are complying with water take limits and that we can report both compliance with limits and quantities of water taken by users across the region. Current levels of charging for managing water use data via the staff hourly charge out rate are not sufficient to recover the costs of this key compliance function.	Yes
18	Rob Haughey	Yes	The council should recover full costs for the service they provide. Users should pay for their water, particularly if the water is used for commercial purposes. eg, irrigation and water bottling.	The proposed charge is targeted to recover the costs incurred by the Council in managing the receipt, verification, compliance check, reporting, managing and maintaining of water use data from the water consent holders who are required to provide the data as evidence of compliance with the consent. Our community expects that we have the systems and processes in place to ensure that water permit holders are complying with water take limits and that we can report both compliance with limits and quantities of water taken by users across the region. Current levels of charging for managing water use data via the staff hourly charge out rate are not sufficient to recover the costs of this key compliance function.	No
32	Peter McBride	No	if it were managed properly i.e with intent to limit nitrates, manage offtakes to all commercial users for the sole benefit of the residential population then i would show interest. But water for the boys and a quasi legal bureaucratic quango ridden gravy train is not my idea of an acceptable solution.	The proposed charge is targeted to recover the costs incurred by the Council in managing the receipt, verification, compliance check, reporting, managing and maintaining of water use data from the water consent holders who are required to provide the data as evidence of compliance with the consent. Our community expects that we have the systems and processes in place to ensure that water permit holders are complying with water take limits and that we can report both compliance with limits and quantities of water taken by users across the region. Current levels of charging for managing water use data via the staff hourly charge out rate are not sufficient to recover the costs of this key compliance function.	No
42	David Collins	Yes	This is part of user pays, which I broadly support.	The proposed charge is targeted to recover the costs incurred by the Council in managing the receipt, verification, compliance check, reporting, managing and maintaining of water use data from the water consent holders who are required to provide the data as evidence of compliance with the consent. Our community expects that we have the systems and processes in place to ensure that water permit holders are complying with water take limits and that we can report both compliance with limits and quantities of water taken by users across the region. Current levels of charging for managing water use data via the staff hourly charge out rate are not sufficient to recover the costs of this key compliance function.	No
48	Tim Lockwood	No	No, stop eating money and just restrict drinking water use to exactly that and use the hundreds of thousands saved for rain harvesting schemes.	The proposed charge is targeted to recover the costs incurred by the Council in managing the receipt, verification, compliance check, reporting, managing and maintaining of water use data from the water consent holders who are required to provide the data as evidence of compliance with the consent. Our community expects that we have the systems and processes in place to ensure that water permit holders are complying with water take limits and that we can report both compliance with limits and quantities of water taken by users across the region. Current levels of charging for managing water use data via the staff hourly charge out rate are not sufficient to recover the costs of this key compliance function.	Yes
61	Frank Hill	No	Noting the incompetence of this unelected council any further changes to water management in Canterbury should be made by a fully elected council.	Doesn't support. On 12 October 2019, elections will be held and there will be no appointed representatives.	No
70	John Bowden	No	Why should we pay for water when the Councils are allowing Foreign companies to come in to NZ and take billions of litres of water for bottling in Belfast Christchurch, for very little cost. This is our most precious commodity in the future. Why did ECAN not become involved before these permits were issued and allowed ??	The proposed charge is not a fee for water or water use but is to recover the actual and reasonable cost of the council in managing the receipt, verification, compliance check, reporting, managing and maintaining of water use data from the water consent holders who are required to provide the data as evidence of compliance with the consent. Our community expects that we have the systems and processes in place to ensure that water permit holders are complying with water take limits and that we can report both compliance with limits and quantities of water taken by users across the region. Current levels of charging for managing water use data via the staff hourly charge out rate are not sufficient to recover the costs of this key compliance function.	No
91	Federated Farmers	No	Federated Farmers is opposed to the proposal to amend the Fees and Charges Policy to allow for the charging of a water data fee, of up to \$200 per consent holder. The stated purposes of the new charge appear to be standard compliance monitoring and data management activities, which should be covered by the existing compliance management charges or by the general rate where there is an element of public interest (such as maintaining data and enabling meaningful access to it) Therefore, Federated Farmers is opposed to the change in policy as currently presented and recommend: That the rates to fund this group of activities are directed to reflect the wider community interest (both urban and rural) in water management and the fact that many of the outcomes sought are for the benefit of communities as a whole (both local and region-wide).	The proposed charge is not a fee for water or water use but is to recover the actual and reasonable cost of the council in managing the receipt, verification, compliance check, reporting, managing and maintaining of water use data from the water consent holders who are required to provide the data as evidence of compliance with the consent. Our community expects that we have the systems and processes in place to ensure that water permit holders are complying with water take limits and that we can report both compliance with limits and quantities of water taken by users across the region. Current levels of charging for managing water use data via the staff hourly charge out rate are not sufficient to recover the costs of this key compliance function.	Yes

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98	Ashburton District Council	No	Ashburton District Council opposes the establishment of the proposed annual water-use data management. We oppose the introduction of this fee as water consent holders already face significant compliance costs in sourcing and providing water monitoring data to Environment Canterbury. Council supports the retention of the status quo.	The proposed charge is targeted to recover the costs incurred by the Council in managing the receipt, verification, compliance check, reporting, managing and maintaining of water use data from the water consent holders who are required to provide the data as evidence of compliance with the consent. Our community expects that we have the systems and processes in place to ensure that water permit holders are complying with water take limits and that we can report both compliance with limits and quantities of water taken by users across the region. Current levels of charging for managing water use data via the staff hourly charge out rate are not sufficient to recover the costs of this key compliance function. It is acknowledged that consent holders already face compliance costs for holding water permits. However there is benefit to the consent holder of having a legal right to take the water consented and a responsibility to comply with conditions of that consent.	Yes
Existing schedule of Fees and Charges					
Submitter ref	User name	Support (Y/N)	Submitter comment	Staff evaluation	Wants to be heard?
1	Andrew Gilligan	No	Out of touch, out of control!	Submitter does not support. No specific points raised in relation to the Fees and Charges Policy.	No
2	Anon	No	Any fool can put prices up if they have a monopoly. It is your job to hold your wealth-draining take as low as possible.	Submitter does not support. No specific points raised in relation to the Fees and Charges Policy. Councillors have reviewed costs, prioritised projects and staff have sort alternative funding sources to minimise rates increases.	Yes
3	Arpad Nagy	No	I'm only referring to the proposed swing mooring annual fee increase, as it is the only one which is affecting my pocket. Based on the fact what I found in the "Fees and charges policy" brochure and also the information what I recently gathered from Ian Fox (acting harbor master) during a public meeting followed by an email, I'm strongly disagree with this increase. The very first thing what I noticed in the Ian's speech, the average time spent on each mooring per year. Well, as he mentioned most of the cases are very simple and barely passing even an hour, but some others are way more complicated and well exceeds the average. In my experience (during my last year's mooring certification) most of extra time induced due the badly specified mooring requirements. All extra time what anyone had to spend on my case was occurred by that, even tough I wouldn't imagine that took longer than the mentioned average. Secondly, I really appreciate the fact the council has overheads and operating costs what try to recover however this cost is in present if no swing mooring owners around whatsoever. So in my perspective this cost is should stay separate from the annual mooring fee as it is barely associated with any activity what mooring owners receive. This is a very sad fact pretty much same as I can't exclude my rent from my annual tax just because I have to live somewhere. Overheads nothing to do with service or allocated time from someone working hours..... It's really not a coffee shop...	The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the council's cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy. Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits. The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.	Yes
6	Leanne Reid	No	Ecan will raise their fees by 'alittle' when they give away our water, our natural resource for free except 'alittle' consent fee. You are suppose to be working for CANTERBURY not the bottling plant, giving more and more away! Especially when NONE of the benefits of the sale of our water returns to our shores and you are helping to enable the use of more plastic bottles. You're not working for the environment, the people who elected you, or NZ as a whole. Shame on you all!!	Doesn't support, on basis of concerns with water bottling plant. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No

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7	Andrew McKay	No	<p>The proposed increases are too much. You are out of control! ECAN should be limited to the increases that match the CPI (•2.4% for inflation, which takes account of increasing operating costs including fuel prices).</p> <p>It looks like you want chch city to pay for transport used in chch, user pays I understand, so no other areas should pay. BUT, it looks like you want chch to pay for water Management and Biodiversity which is clearly a massive subsidy of areas outside chch. Hardly seems fair to have chch to solely pay its way, and then have chch subsidies other areas. •3.5% reflects a proposed increase in spending on water management (\$3.2m) and biodiversity (\$0.8m) programmes</p> <p>Public transport should be paid for by the users, no subsidies. Full user pays. •3.0% on proposed increased public transport funding which, with the supporting NZTA funding, will improve the frequency of service. This would be funded mostly from a targeted Christchurch urban rate.</p> <p>Hand transport to district and city council as you have failed.</p>	<p>Increased funding for public transport to match supporting funding from the New Zealand Transport Agency, and increased funding in water management, pest control and biodiversity. A reduction in air quality funding is also being considered to help allow for the increases.</p>	No
15	Douglas George	No	<p>I am appalled at the 100% increase in the admin. fee charged to swing mooring owners.</p> <p>We are a captive group of individuals who are allowed very little input as to what we are charged for services provided by ECAN.</p> <p>In his summary of a meeting held at Naval Point on 18th February Deputy HM Ian Fox quoted income and expenditure showing a deficit.</p> <p>Unless we are allowed to see the detail of these figures we can make no accurate comment either positive or negative.</p> <p>The question has to be asked why was this situation left to develop to the stage where mooring owners are required to pay this 100% increase in fees.</p> <p>If this were to happen in the private sector heads would roll!</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	No
25	Michael Pendleton	No	<p>I oppose the one hundred per increase in Swing Mooring fees. A petition of over seven hundred (700) signatures opposing the Harbour Master's Office (HMO) management of moorings has been collected. There are 600 mooring holders in Canterbury. It is available online and the HMO is aware of it.</p> <p>The one hundred percent increase in swing mooring fees is directly or indirectly to cover the HMO legal costs. In an email provided by HMO in response to queries at Naval Point Yacht Club meeting with HMO its total deficit was stated as \$79,571.00. In the High Court litigation by nearly one hundred swing mooring holders against ECAN last year it sought \$76,489 as security for ECAN's legal costs. The close approximation of the figures is unlikely to be a coincidence. Mooring holders are being asked to finance the cost of complaining.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p> <p>There is no relationship between this proposed fee increase and the High Court matter referred to.</p>	No
26	Robert Rodgers	No	<p>I do not support the hundred percent increase in the Swing Mooring fee. I would like to see the true financial breakdown of costs to justify this increase.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially</p>	No

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				<p>recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	
30	Ian McFarlane	No	<p>My name is Ian McFarlane and I am Chairman of the Purau Moorings Association (an association currently with 100 members of private mooring holders in Purau Bay). The membership has resolved to oppose any increase in swing mooring fees.</p> <p>We regard the proposed increased fee as adding insult to inquiry.</p> <p>Although we have asked for a breakdown of costs to justify the 100% increase in swing mooring fees, we have only been given rough generalisations. We are simply not listened to by the Harbourmaster's Office on our many and various grievances over recent years.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	No
31	Verna Black	No	<p>I do not support the proposed 100% increase in swing mooring fees nor do I support the proposed weekly rental charge for an ECAN owned swing mooring.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p> <p>Ecan does own several moorings and does charge a weekly rental for any vessels using those moorings.</p>	No
32	Peter McBride	No	<p>thievery and interference in peoples recreational pursuits by fleecing the mooring owners and users and applying punitive changes in an effort to ensure the LPC new marina is profitable and the decline and denuding of mooring generally by application of draconian and Orwellian management processes is a disingenuous rape and pillage of a way of life for many.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	No
42	David Collins	No	<p>I haven't looked in detail, but like most councils Ecan keeps ramping up charges and I'm not convinced there is enough managerial effort put into controlling costs.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p>	No

				<p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	
43	Larry Burrows	No	<p>I oppose a doubling of the swinging mooring fees. There has been no corresponding doubling of the services I receive.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	No
46	Barry Dacombe	No	<p>Swing Mooring Charges I strongly object to the proposed increase in charges for swing moorings. I own and maintain a swing mooring in Akaroa Harbour and while I accept ECAN may find the cost of administration to exceed the present fees charged, I believe that it is incumbent on ECAN to manage its activities within the current charges.</p> <p>I do not accept that the administration of a mooring facility requires such an overlay of supervision. Safety is assured through the annual inspection by ECAN registered contractors for which I pay significant charges. These inspections are triggered by me on a "bring-up" basis with the contractor who completes the inspection and provides a report which is forwarded to ECAN.</p> <p>There is no need to write me a letter of reminder which is the only contact I have with ECAN. Being asked to pay \$230 pa for this service is simply outrageous. I get complementary reminders from various service enterprises - WoF, REGO for example - from time to time as a courtesy. Why should I entertain a charge for this from ECAN? The current charge of \$115 pa for record keeping is in my opinion, more than enough.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	No
52	Daniel Petrache	No	<p>I absolutely oppose the one hundred per increase in Swing Mooring fees.</p> <p>The increase is out of step with reasonable increases and cannot see the justification for the amount.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put</p>	No

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				in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.	
56	Brian Davidson	No	I strongly object to a 100% increase in monitoring fees for a swing mooring. If the system is to be a user pays system then any costs relating to abandoned vessels etc should not lie with compliant mooring holders in that harbour. Although we have been supplied with an allocation of existing costs, we received an undertaking from Ian Cox that he would provide a more detailed breakdown but we have not received this to date.	The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy. Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits. The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.	Yes
57	Philip Lees	No	I am very concerned at the 100% increase in the annual swing mooring fee. This is setting a bad precedent for the future.	The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy. Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits. The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.	No
59	Ken Watson	No	The increase in annual fees for Purau swing mooring appears to be excessive and seems to be a revenue gathering exercise as I find it very hard to believe the administration costs warrant such a hefty increase. Also the buying /selling of Purau moorings in the past was a simple process but which now appears to be overly complicated with excessive over management of this creating additional costs for no real gain/benefit to anyone except to ECAN. Over managing a system/facility that was already functioning fine and then increasing fees to justify somebodys salary to administer this seems ludicrous. Inflation adjusted fee increases can be acceptable if justified and mooring holders are informed of this but a sudden doubling of fees appears to be a lack of addressing any inflation issues in the past and smacks of poor management and financial skills.	The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy. Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits. The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.	No

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63	John Stewart	No	<p>I object to the increase in swing mooring fees. I do not think sufficient information has been given as to the administration charges. For a relatively small number of moorings the cost of an office and administrator is excessive and far out of line with any competitive business model, of which I am aware. Ecan as a rating based authority has a duty to operate efficiently. I require a further breakdown of the administration costs before being satisfied with any increase. I accept the wages/salary of Emma and the harbour master but the overheads in excess of \$100,000, indicate inefficiency and excess. Would it be more cost efficient to subcontract the admin aspect out to a private operator? Please let me have further details.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy. Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits. The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	No
73	John Moyle	No	<p>This was meant to be a survey only for new mooring fees. I do not support new charges. They are trying to justify this by doing unnecessary changes, which should not be charged to mooring holders. A gradual increase in fees may be acceptable, but to double fees is extortion typical of a state run monopoly.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy. Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits. The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	No
82	Susan Stubenvoll		<p>As a mooring holder I would like to make the following submission: 1. Please could ECan avoid all requirements to lift or inspect a mooring outside a regular annual maintenance schedule which is undertaken by the mooring user at his or her own expense. This year I have been required to make two additional inspections, both unnecessary and both on my own considerable expense, the second being totally unnecessary. 2. Please could ECan provide the Harbourmaster with access to a vessel with an engine big enough to relay a mooring properly - i.e. laid out in a line. The current vessel's engine is incapable of laying a heavy mooring but the Pilot vessel would be capable. A mooring laid (or relaid) with insufficient power ends up in a heap which may cause entanglement.</p>	<p>The matters raised here are not for consideration as part of the annual plan consultation and will address directly by the harbourmasters office.</p>	No
84	Anon	No	<p>I do not support any increase in the annual mooring fees (currently \$100 + GST p.a.). The 100% increase proposed is excessive.</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy. Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits. The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put</p>	No

				in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.	
96	John McKim	No	I do not support the increased fees and charges for mooring owners.	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	Yes
Additional comments on Fees and Charges policy					
Submitter ref	Submitter name	Support (Y/N)	Submitter comment	Staff evaluation	Wants to be heard?
1	Andrew Gilligan	N/A	Out of touch, out of control!	No specific points raised in relation to the Fees and Charges Policy.	No
6	Leanne Reid	N/A	I have no faith in this council or their decision making after their refusal to listen to Canterbury ratepayers re water bottling plant!	No specific points raised in relation to the Fees and Charges Policy. Information about water bottling consents can be found on our website and is regularly updated. https://www.ecan.govt.nz/get-involved/news-and-events/2017/water-bottling-whats-the-story/	No
11	Sophia O'Neill	N/A	We all pay our fees, every year it goes up and every year we get the same thing .we pay for water management but we can't swim in some waters, water management should have been a on going thing not just something we have to pay for now	No specific points raised in relation to the Fees and Charges Policy. Councillors have reviewed costs, prioritised projects and staff have sort alternative funding sources to minimise rates increases. Freshwater management is a strategic priority of the Council.	No
29	Leslie Hogbin	N/A	Charges should reflect costs but the issue for ECAN is that service has up till now been well below expectation or what should be reasonably expected.	Services and activities are set in consultation with community every three year (provided to the community for feedback as part of the Long-Term Plan consultation) and this feedback helps the Councillors confirm what changes need to be made. An annual report is produced every year to report on progress on levels of service measures and targets.	No
31	Verna Black	N/A	There appears to be no justification for a 100% increase in swing mooring fees and the current mooring fee is approximately four times what is charged in the local community. (also comments under existing schedule)	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	No
43	Larry Burrows	N/A	The need to double fees indicates management incompetence by the harbourmaster's office and ECAN as a whole (also comments under existing schedule)	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100</p>	No

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				<p>plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	
56	Brian Davidson	N/A	<p>1. Mooring owners who take a disproportionate amount of staff time should be charged accordingly in a true user pays structure.</p> <p>2. Although it has been explained at public meetings that mooring fees have remained static for a number of years, an unfortunate precedent would be set if a 100% increase was to take place in one year. (also comments under existing schedule)</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	Yes
84	Anon	N/A	<p>If the proposed fee increase does go ahead; as a retired superannuitant, I request the provision to pay it by installment, i.e. quarterly. (submitter also comments under existing schedule)</p>	<p>The council must ensure swing moorings are safely and efficiently managed and maintained. The council incurs costs in completing this function and providing this service to swing mooring occupiers. The costs of providing this service have remained at a minimal fee for many years but the increasing costs of providing this service by the council are now exceeding the existing fees being recovered. It is the councils cost recovery policy to recover costs from those who necessitate the service rather than the general rate payer. The proposed new fee is an actual and reasonable charge in line with Council policy.</p> <p>Environment Canterbury has undertaken the role of swing mooring management since its establishment in 1989. In July 2009 the permitted activity areas for swing moorings were introduced, meaning that most swing moorings would no longer require a resource consent. With the advent of a new navigation safety bylaw in 2010 a mooring management fee of \$100 plus GST was introduced to help recover costs of undertaking the management work, which had been only partially recovered by resource consent fees. This fee was set at the median level (range was \$75-\$125) that had been charged by the Lyttelton Harbour Board in 1988 for swing moorings site occupation permits.</p> <p>The mooring areas have since been progressively cleared of obsolete and unmaintained moorings, and a suitable swing area has been established for vessels. Mapping of the areas has been undertaken, and a suitable maintenance regime put in place to ensure the safety of all vessels. We now have an accurate cost of the management of mooring areas. This cost is now to be shared amongst mooring occupiers.</p>	No
98	Ashburton District Council	N/A	<p>As a final point, Ashburton District Council notes that the Fees and Charges Policy does not show the existing financial year fees and charges in comparison with the proposed fees and charges. We believe that the inclusion of both years information would be a more transparent way of providing information to stakeholders.</p>	<p>The proposed changes were shown in the proposed Fees and Charges Policy however it is acknowledged this was not shown in a marked version showing both years information. We appreciate the feedback and will certainly look to present the changes differently in future.</p>	Yes

REVENUE AND FINANCING POLICY CONSULTATION COMMENTS

Proposed changes to the Revenue and Financing Policy to amend the land value/land area split for Regional Targeted Pest Management rates					
Submitter ref	Submitter name	Support (Y/N)	Submitter comments	Staff evaluation	Wishes to be heard
1	Andrew Gilligan	N/A	Out of touch, out of control!	Submitter response does not relate to proposed changes to Revenue and Financing Policy.	No
2	Anon	No	This is another money gathering exercise.	The Regional Targeted Pest Management rate is collected to fund, together with general rates, Environment Canterbury's biosecurity work.	Yes
3	Arpad Nagy	No	Well, I just want need to say again, I don't feel fair to throw the overheads to the fees. Keep operation costs separate, find other way do source funds....	Submitter response does not relate to proposed changes to Revenue and Financing Policy.	Yes
6	Leanne Reid	No	I have no faith in this council or their decision making after their refusal to listen to Canterbury ratepayers re water bottling plant!	Submitter response does not relate to proposed changes to Revenue and Financing Policy.	No
9	Paul Hamilton	No	How on earth is this a fair user-pays type change? Surely with more land area it requires greater pest management resources, value irrespective.	The Regional Targeted Pest Management rate is a single targeted rate across all rural land, rather than separate district-by-district rates or a user-pays model. Taking a regional approach provides operations flexibility, allowing Environment Canterbury to apply biosecurity resources where they are needed across the region. This enables the biosecurity system to be more responsive to the region's needs in the long-term. The current 50:50 split has resulted in a small number of large properties facing significant increases in their rates. To address this, the draft Revenue and Financing Policy proposes to change the formula to 80% land value, 20% land area.	No
12	Michael Will	No	The same pests that were on our land, have doubled in 2 years.	No specific points raised in relation to the Regional Targeted Pest Management rate. Comments noted.	Yes
35	Steve McNeill	No	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.	The Long-Term Plan 2018-2028 (LTP) made changes to regional pest rating. The Regional Targeted Pest Management rate is now a single targeted rate across all rural land, rather than separate district-by-district rates or a user-pays model. Taking a regional approach provides operations flexibility, allowing Environment Canterbury to apply biosecurity resources where they are needed across the region. This enables the biosecurity system to be more responsive to the region's needs in the long-term. The current 50:50 split set out in the LTP has resulted in a small number of large properties facing significant increases in their rates. To address this, the draft Revenue and Financing Policy proposes to change the formula to 80% land value, 20% land area.	No
58	P Taylor	No	Insufficient information on the impact of the proposed changes to the status quo have been provided to allow me to either support or oppose. I'd request that my current rates fee [for all Port Blakely properties in the ECAN region] be provided along with an estimate of the new rate amount for Port Blakely's properties to allow me to make an informed comment. Further I request that the submission period be extended to allow me to make an informed submission.	Staff followed up directly with submitter to enable provision of further details. No response received from submitter to date.	No
70	John Bowden	No	The Takamatua Ratepayers Association have been proactive in already establishing a network of traps (40+) and recording GPS and species captured for some time. We do not need ECAN to come in and charge us additional rates on our properties. Trap purchase has also been funded by the TRA.	The Regional Targeted Pest Management rate is a single targeted rate across all rural land, rather than separate district-by-district rates or a user-pays model. Taking a regional approach provides operations flexibility, allowing Environment Canterbury to apply biosecurity resources where they are needed across the region. This enables the biosecurity system to be more responsive to the region's needs in the long-term.	No
86	Pam Richardson	Yes	The split prevents the impacts of higher values for larger properties	Support noted.	Yes

91	Federated Farmers		<p>Following Council's adoption of the Canterbury Regional Pest Management Plan and the 2018–2028 LTP, a change was made to the way targeted pest management rates were levied. The new formula was based 50% on land area and 50% on capital value, whereas previously it was based purely on capital value. The land area charge was set at \$0.38/ha. This resulted in the owners of a small number of very large properties (greater than 3000 ha) facing large increases in their rates. To address this issue, it is proposed to change the formula to 80% capital value and 20% land area, with a land area charge of \$0.13/ha. It is also proposed to remit the calculated difference in rates charged between the two formulas, to the owners of properties greater than 3000 ha.</p> <p>Federated Farmers supports the new rating formula for targeted pest management rates along with the proposal to remit rates already paid in excess of the new formula (by the owners of properties greater than 3000 ha). However, the targeted rate take for pest management is large and every effort must be made to use it efficiently and focus on the weeds and pests most relevant from both farming and biodiversity standpoints.</p>	<p>Comments noted.</p> <p>One point raised by the submitter is incorrect. The formula used for pest management rating is currently 50% land value:50% land area. The proposal is to rate at 80% land value :20% land area. Capital value is not included in the formula. The Regional Targeted Pest Management rate is a single targeted rate across all rural land. Taking a regional approach provides operational flexibility, allowing Environment Canterbury to apply biosecurity resources where they are needed across the region. This enables the biosecurity system to be more responsive to the region's needs in the long-term.</p>	Yes
98	Ashburton District Council	Yes	<p>Ashburton District Council acknowledges the proposals contained within the Revenue and Financing Policy. Ashburton District Council opposes this proposal to amend the land value/land area split for targeted pest management rates from 50% land value/50% land area; to 80% land value/20% land area.</p> <p>As all pest rates will be levied on a regional basis for all rural classified properties, Council is concerned that rural ratepayers in our District will be burdened with a rate that is disproportionate to the benefits they receive. Many rural properties in our district are likely to have a higher land value than other areas in Canterbury, which are more likely to receive a far greater benefit from this work.</p> <p>We support the retention of the status quo 50% land value/50% land area split until Environment Canterbury can demonstrate proportionate benefits accruing to our rural ratepayers. We do not see a strong evidential basis in the RF Policy or the consultation document to support the proposed amendment.</p>	<p>Comments noted.</p> <p>The Regional Targeted Pest Management rate is a single targeted rate across all rural land, rather than separate district-by-district rates or a user-pays model. Taking a regional approach provides operational flexibility, allowing Environment Canterbury to apply biosecurity resources where they are needed across the region. This enables the biosecurity system to be more responsive to the region's needs in the long-term.</p> <p>The current 50:50 split has resulted in a small number of large properties facing significant increases in their rates. To address this, the draft Revenue and Financing Policy proposes to change the formula to 80% land value, 20% land area. This change to the formula has been analysed and considered with reference to, and in keeping with, Environment Canterbury's Revenue and Financing Policy guiding principles, particularly affordability and overall impact on the community.</p>	Yes

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

Submitter ref	Submitter name	Support (Y/N)	Submitter comments	Staff evaluation	Wishes to be heard
1	Andrew Gilligan	No	Out of touch, out of control!	Submitter response does not relate to proposed Pest-Free Banks Peninsula rate.	No
2	Anon	No	Have you tried asking people about this? Not just hitting them with a bill and saying we're going to do it. You are not building an empire.	Environment Canterbury is consulting on the proposed changes to the Revenue and Financing Policy relating to this proposed rate through this process.	Yes
3	Arpad Nagy	No	I don't know	No specific points raised in relation to Pest-Free Banks Peninsula rate.	Yes
6	Leanne Reid	No	I have no faith in this council or their decision making after their refusal to listen to Canterbury ratepayers re water bottling plant!	Submitter response does not relate to proposed Pest-Free Banks Peninsula rate.	No
9	Paul Hamilton	Yes	This should have happened a decade or two ago so yes I strongly support this and more should be done.	Comments noted.	No
18	Rob Haughey	Yes	Positive move for long term improvements banks peninsula.	Comments noted.	No
20	Alex Hallatt	Yes	Hell yes.	Support noted	No
32	Peter McBride	No	it will never be pest free and it is a pointless waste of money trying.	The Pest-Free Banks Peninsula initiative is working towards the goal of Banks Peninsula/Te Pātaka o Rākaihautū being effectively free of pest animals. The Memorandum of Understanding that supports this initiative sets out that 'effectively free of pest animals' means that defined pest animals have been reduced to numbers that do not threaten biodiversity values. This is considered a pragmatic definition and accepts that while it may be possible to eliminate some pest animal species from the Peninsula (e.g. goats or deer), it may not be possible to eliminate them all (e.g. rodents). The intent is to reduce all pest animals to zero or as close to zero as possible across the Peninsula.	No
34	Maureen McCloy	Yes	Very keen for this to go ahead so that pest eradication on the Peninsula can be securely funded - we simply need to do better in support of our native flora and fauna.	Comments noted.	No
37	Josh Kempthorne	No	Rather than rating properties that are already taxed. Why is ECAN not looking for much better and reliable sources of revenue. For example, if you're going to sell our water (New Zealand's greatest natural resource) you should tax the purchaser/litre and generate millions.	No specific points raised in relation to Pest-Free Banks Peninsula rate.	No
39	Mark Christensen	Yes	Where other programmes have a primary benefit of biodiversity, the Council's contribution is funded entirely from general rates. This long standing policy reflects the public good nature of	Comments noted.	Yes

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			biodiversity. While the proposed programme is primarily for biodiversity, I want to ensure that it continues to be community led and I believe that having a targeted rate component provides a stronger basis for this. I also recognise that funding this initiative entirely from general rates may lead other parts of the region to ask for similar support without the same local commitment that has been demonstrated through this initiative and the CIP programme. For these reasons, I accept the proposed 50:50 split between general and targeted rates as a pragmatic solution in the meantime that allows local community aspirations to be met while also acknowledging the wider benefits of biodiversity.		
40	Richard Ball	Yes	It is an exciting opportunity to create a real step change in biodiversity. It is widely supported on the Peninsula and in addition to helping our biodiversity (one of ECan's top priorities), it will: provide an opportunity for community involvement in environmental protection on the doorstep of Christchurch (including the Port Hills and Lyttelton harbour basin); support long term tourism; support agriculture by eliminating disease vectors, and; reduce the nuisance of pests for residents (including having goats and deer browsing on restoration planting and even gardens on the Port Hills south of Christchurch). As a long term resident and landowner on the Port Hills, I would be happy to pay this additional rate. It amounts to less than 1/10th of 1 cup of coffee per week.	Comments noted.	Yes
41	Selwyn District Council	Yes	SDC supports the Pest Free Banks Peninsula Programme and suggest that the Regional Council considers the suitable management of domestic and stray cats	Comments noted. Whilst Environment Canterbury is not considering managing domestic and stray cats, in the context of Banks Peninsula, over the first five years the focus of Pest-Free Banks Peninsula/Te Pātaka o Rākaihautū will be on eradicating feral goats, and controlling pests such as possums, feral cats, mustelids (ferrets, stoats and weasels) and rats.	Yes
42	David Collins	Yes	This initiative has the potential to show real progress and capture public interest.	Comments noted.	No
44	Paul Bingham	Yes	Where other programmes have a primary benefit of biodiversity, the Council's contribution is funded entirely from general rates. This long standing policy reflects the public good nature of biodiversity. While the proposed programme is primarily for biodiversity, I want to ensure that it continues to be community led and I believe that having a targeted rate component provides a stronger basis for this. I also recognise that funding this initiative entirely from general rates may lead other parts of the region to ask for similar support without the same local commitment that has been demonstrated through this initiative and the CIP programme. For these reasons, I accept the proposed 50:50 split between general and targeted rates as a pragmatic solution in the meantime that allows local community aspirations to be met while also acknowledging the wider benefits of biodiversity	Comments noted.	No
45	David Miller	Yes	As a landowner on Banks Peninsula, I fully endorse the proposed creation of a rating area (including the Port Hills) to support the vision of a pest-free Banks Peninsula. Where other programmes have a primary benefit of biodiversity, the Council's contribution is funded entirely from general rates. This long standing policy reflects the public good nature of biodiversity. While the proposed programme is primarily for biodiversity, I want to ensure that it continues to be community led and I believe that having a targeted rate component provides a stronger basis for this. I also recognise that funding this initiative entirely from general rates may lead other parts of the region to ask for similar support without the same local commitment that has been demonstrated through this initiative and the CIP programme. For these reasons, I accept the proposed 50:50 split between general and targeted rates as a pragmatic solution in the meantime that allows local community aspirations to be met while also acknowledging the wider benefits of biodiversity.	Comments noted.	Yes
47	Alison Ross	Yes	Possums, feral cats, rabbits, stoats etc are killing native fauna and flora.	Comments noted.	No
49	Penny Hazard	Yes	I am involved in a pest trapping programme in the Marlborough Sounds, where I have a secondary home. After 10 years of basic trapping - even with limited funding, it is wonderfully rewarding to see and hear so much more bird life. To have this happening in our backyard in Christchurch, will be exciting. I am a Port Hills resident, already partaking in the local trapping programme. A pest free Banks Peninsula would be a valuable asset for Christchurch. The combination of coastline, planting and abundant bird life, will not only enrich the lives of Cantabrians, but will be a strong tourist attraction. The household amount proposed seems fair and reasonable.	Comments noted.	Yes
50	Jack Gibbs	Yes	Achieving a pest free Banks Peninsula is a high priority. It will demonstrate that what has been achieved on islands can now be done on the mainland. Thus providing a role model towards making NZ predator free by 2050.	Comments noted.	No
55	Jim Wilson	Yes	We are very happy, as rate payers, to pay an additional targeted rate for pest control to help achieve the goal of a pest-free Bank's Peninsula.	Comments noted.	No

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62	Tamsin Page	Yes	This is a great initiative that will contribute to real gains for indigenous biodiversity on Banks Peninsula, including the Port Hills. This will provide wider, flow-on benefits for the wider Christchurch community in terms of landscape, recreational and well-being values; potential benefits for tourism in the area; as well as potentially long-term water quality improvements (more successful restoration planting on hills leading to reduced run-off to harbours, estuaries and rivers). It will also enable greater community involvement in pest management - something that will be central to progressing the wider Pest Free 2050 goal. As a long-time Port Hills landowner, I support this initiative.	Comments noted.	No
66	Summit Road Society	Yes	As a partner within Pest Free Banks Peninsula and Port Hills Partnership, the Summit Road Society enthusiastically endorses the proposal set forth by the working group. Of key importance is the need to appropriately resource this initiative. We therefore support the proposed changes to the Revenue and Financing Policy to create a rating area (including the Port Hills). This additional revenue will be critical to achieving the vision of a Pest Free Banks Peninsula. Furthermore, it provides a base upon which other funding contributions can be leveraged. We further support the Pest Free Banks Peninsula working group's request for additional funding from 2020/2021 as the programme of work grows. We would also highlight that there is much interest and engagement from backyard trappers to increase trapping in urban reserves. We hope to continue our present collaboration with partner agencies to extend volunteer and agency predator controls in reserves. With our comparatively dense Port Hills population, the cost per person of predator control is many times lower than the cost of trapping in rural or wilderness areas, which will continue to need the bulk of our community's material support. And of course the Society will also continue our pest control efforts (including of pest plants) within our reserves. We wish to draw attention to the issue of pigs and deer at our Omahu reserve. These pest animals damage emerging native vegetation and a significant threat to biodiversity. Spur valerian (a plant pest) is another concern and we thank Environment Canterbury for their previous grants to fight this invasive weed at Ohinetahi. This is an ongoing issue that will require further resourcing. However we are determined to protect the forget-me-not population and the unique flora in the rock outcrop habitat within Ohinetahi, such as prostrate kowhai (Sophora prostrata) and the endemic Banks Peninsula hebe (Heliohebe lavaudiana). Our efforts also contribute to a wider community and agency objective to prevent the spread of spur valerian onto Banks Peninsula.	Comments noted. Any increases in funding for year 3 of the LTP (2020 -2021) are likely to be considered by Council in the annual plan process for that year. Environment Canterbury supports Pest Free Banks Peninsula seeking funding from additional partners.	Yes
67	Gary and Jane Healey/Loe	Yes	We do support a pest free Peninsula. We have our own vigorous trapping programme on our 4ha Takamatua property. I am just concerned that the extra cost will be used effectively and not just levied to aid E-Can coffers and ineffective regional management & enforcement. Just look at the noxious plants (eg gorse) allowed to flourish on roadsides, waterways and properties throughout Canterbury !! If you create the targeted rate you must implement its use correctly and effectively.	Comments noted. ECan set rules for occupiers of land to manage pests identified in the RPMP. Where there are specific rules to manage pests we carry out a inspection programme. For other pests, control may be undertaken by ECan.	No
68	Chris Bostock	Yes	I support \$600,000 for pest control in Banks Peninsula. This is a fantastic aspiration and I would love to see Bank Peninsula become a pest-free sanctuary for native birds, butterflies and reptiles.	Comments noted.	No
70	John Bowden	No	NO, I do not support this for the reasons described above	Over the first five years the focus of Pest-Free Banks Peninsula/Te Pātaka o Rākaihautū will be on eradicating feral goats, and controlling pests such as possums, feral cats, mustelids (ferrets, stoats and weasels) and rats. ECan is a signatory to the Pest-Free Banks Peninsula initiative that is working towards the goal of Banks Peninsula/Te Pātaka o Rākaihautū being effectively free of pest animals. The Memorandum of Understanding that supports this initiative sets out that 'effectively free of pest animals' means that defined pest animals have been reduced to numbers that do not threaten biodiversity values. This is considered a pragmatic definition and accepts that while it may be possible to eliminate some pest animal species from the Peninsula (e.g. goats or deer), it may not be possible to eliminate them all (e.g. rodents). The intent is to reduce all pest animals to zero or as close to zero as possible across the Peninsula.	Mp
72	Alex McNeill	Yes	Biodiversity is important and needs to be funded, preferably by those who live near the area in question and will benefit the most from the changes.	Comments noted.	No
74	Michele Laing	No	Ecan have a statutory responsibility for controlling pests. Many people have been controlling rats, mustelids, possums, rabbits, wasps, hedgehogs, magpies, weeds etc with absolutely no assistance from Ecan apart from elaborate nascella tussock communications for many years. All this has involved a lot of our time and money. Central government has now set up a large national organisation "Predator" free NZ, funded by our taxes. Ecan became part of a joint organisation Pest Free Banks Peninsula...but we weren't consulted. I want to know precisely how the money is planned to be spent. The focus of Pest Free Banks Peninsula has not been	Pest Free Banks Peninsula is a community-led, agency-supported, landscape scale initiative, working towards the Peninsula being effectively free of animal pests by 2050 to support indigenous biodiversity. Over the first five years, the focus will be on eradicating feral goats, and controlling pests such as possums, feral cats, mustelids (ferrets, stoats and weasels) and rats. Environment Canterbury along with other agencies, community groups and local Papatipu Rūnanga agreed to collectively support the initiative late last year, acknowledging the significance of Banks	No

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			related to my location. It has largely been on farmers, who make up most of it, and Corporates, who put a minuscule amount into this compared with what they pay their CEOs. I also want to know why ECan and Pest Free Banks Peninsula don't get money for this from "Predator" free NZ...like lots of other people and organisations are doing. I also don't think we need another structure with paid bureaucrats to do the same work.	Peninsula as a biodiversity hotspot. This rate (combined with an equal contribution of general rates) will enable Environment Canterbury to make a contribution towards the Pest Free Banks Peninsula initiative, while continuing to deliver possum control on Banks Peninsula. The Pest Free Banks Peninsula initiative receives funding from multiple partners. Some of the parties involved have indicated that this funding will provide a basis to leverage further funding, The Government's Predator Free 2050 initiative provides funding on a 1 for 2 basis, that is for every \$2 that local councils and the private sector put in, the Government will contribute another \$.	
75	Sue Cumberworth	Yes	It supports an increase in biodiversity protection and enhancement. It also supports a reduction in nuisance pests eating restoration plantings and gardens. As a long term resident and landowner on the Port Hills, I would be happy to pay this additional rate.	Comments noted.	Yes
76	Peter Rough	Yes	I live in Lyttleton and almost daily go walking around the coastline of Lyttleton Harbour or on the Port Hills and occasionally I walk on tracks and in reserves in other parts of Banks Peninsula. I support the vision for a pest-free Banks Peninsula because I would like to see more native vegetation and native wildlife (especially birds) thriving on the Peninsula.	Comments noted.	No
78	Laura Molles	Yes	I am a resident of the Port Hills, so will be directly affected by the new rating area. I wholeheartedly support this. We moved to the Port Hills specifically because we wanted to have regenerating bush and native wildlife on our doorstep, and we would like to see native biodiversity thriving right across the Peninsula. It's a big job, and I'm happy to chip in to help it happen.	Comments noted.	Yes
79	Katie Nimmo	Yes	I lived in Aro Valley in Wellington when Zealandia was established. Over the years whilst visiting my former community I observed the extraordinary change in bird life. My former neighbour's strawberry tree now drip with Tui and kaka scramble up and down their gum tree. Seeing a similar transformation on the Banks Peninsula is overdue and possible. At an overnight stay at a BNB in Allandale/Governors Bay, I woke to a morning chorus that needs more voices in the choir. A rating area for this wonderful vision is essential to fill the missing parts.	Comments noted.	Yes
80	Kate Whyte	Yes	Where other programmes have a primary benefit of biodiversity, the Council's contribution is funded entirely from general rates. This long standing policy reflects the public good nature of biodiversity. While the proposed programme is primarily for biodiversity, I want to ensure that it continues to be community led and I believe that having a targeted rate component provides a stronger basis for this. I also recognise that funding this initiative entirely from general rates may lead other parts of the region to ask for similar support without the same local commitment that has been demonstrated through this initiative and the CIP programme. For these reasons, I accept the proposed 50:50 split between general and targeted rates as a pragmatic solution in the meantime that allows local community aspirations to be met while also acknowledging the wider benefits of biodiversity.	Comments noted.	Yes
85	Rod Donald Banks Peninsula Trust	Yes	The Trust supports the <ul style="list-style-type: none"> • submission of the Pest Free Banks Peninsula working group in full • 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 • In addition, the Trust ask that the Council programme provide an additional \$400,000 from year 3 (2020-21) onwards of the LTP to bring the total financial support to \$1m / per annum to enable PFBP to seek further funding from other partners. • Also agree that plant pests should be separately organised and that targeted rate component provides strong basis for community led project. 	Comments noted. Any increases in funding for year 3 of the LTP (2020 -2021) are likely to be considered by Council in the annual plan process for that year. Environment Canterbury supports Pest Free Banks Peninsula seeking funding from additional partners.	Yes
86	Pam Richardson	Yes	Our biodiversity values on Banks Peninsula are significant. With a focus on pests based on work from years of working together and increased funding we should see good results.	Support noted.	Yes
87	Te Hapū o Ngāti Wheke Inc	Yes	Te Hapū o Ngāti Wheke Inc support the submission of the Pest Free Banks Peninsula Working Group. The Whaka-Ora Healthy Harbour plan highlights pest eradication and support of Predator Free 2025 as actions that support the vision of this plan. Te Pātaka o Rākaihautū Banks Peninsula is a biodiversity hotspot with both endemic and threatened species, including mahinga kai species. Like most other biodiversity programmes, there will also be economic, social and cultural benefits to eradicating pests. With the Peninsula being part of greater Christchurch, it provides opportunities for the urban population to be involved in protecting this unique biodiversity. Environment Canterbury's support of this programme is (albeit unacknowledged) a tangible way that they can show their support for the actions within the Whaka-Ora healthy Harbour plan.	Support noted.	Yes

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88	Feral Goat Working Group	Yes	(extract from written submission) The group supports PFBP and looks forward to being involved.	Support noted.	Yes
89	Ōnuku Rūnanga	Yes	Ōnuku Rūnanga generally support the proposed changes to the Revenue and Finance Policy to create a rating area to support the vision for a pest-free Banks Peninsula. We congratulate the Canterbury Regional Council (the Council) on its commitment to the Pest Free Banks Peninsula (including Port Hills) / Te Pātaka o Rākaihautū Initiative. The vision for a Pest Free Banks Peninsula is aligned with the aspiration of our rūnanga to enhance the mahinga kai value of our takiwā which includes the enhancement and protection of native biodiversity.	Support noted.	No
90	Te Taumutu Rūnanga	Yes	The Rūnanga look forward to continuing their work with the Pest Free Banks Peninsula Working group and achieving a pest-free Banks Peninsula.	Support noted.	No
91	Federated Farmers	Yes	Federated Farmers supports the Pest Free Banks Peninsula work but asks that every effort is made to keep expenditure within the rate of inflation throughout the 10 years of the LTP.	Comments noted.	Yes
92	Ōpāwaho Heathcote river network	Yes	(extract from written submission) Ask to be consulted on what is proposed under this programme within the Ōpāwaho/ Heathcote catchment and to be involved in the implementation.	Comments noted. Environment Canterbury is a partner in The Pest-Free Banks Peninsula initiative, which includes CCC and other agencies. The Ōpāwaho Heathcote River network could seek opportunities to engage with the group. The group is working towards the goal of Banks Peninsula/Te Pātaka o Rākaihautū being effectively free of pest animals. The Memorandum of Understanding that supports this initiative sets out that 'effectively free of pest animals' means that defined pest animals have been reduced to numbers that do not threaten biodiversity values. This is considered a pragmatic definition and accepts that while it may be possible to eliminate some pest animal species from the Peninsula (e.g. goats or deer), it may not be possible to eliminate them all (e.g. rodents). The intent is to reduce all pest animals to zero or as close to zero as possible across the Peninsula.	Yes
93	Pest Free Banks Peninsula Working Group	Yes	(Extract from written submission) Support the proposed changes to the revenue and finance policy to create a rating area (including the Port Hills) to support the vision for a pest-free Banks Peninsula, In addition, we ask that the council programme in this change plus an additional \$400,000 from year 3 onwards of the LTP While the proposed programme is primarily for biodiversity, it is acknowledged that, like most biodiversity projects, there will be local benefits for those living on the Peninsula. These include enjoyment of rejuvenating bush and increased bird life, less erosion leading to better water quality, improved mahinga kai, and some economic benefits for farming and tourism. We also want to ensure that it continues to be community lead and believe that having a targeted rate component provides a stronger basis for this. We also recognise that funding this initiative entirely from general rates may lead other parts of the region to ask for similar support without the same local commitment that has been demonstrated through this initiative and the CIP programme. For these reasons, we accept the proposed 50:50 split between general and targeted rates as a pragmatic solution that allows local community aspirations to be met while also acknowledging the wider benefits of biodiversity. We also note and support the continuation of rabbit control rate as a separate programme. At this point we believe the Council is best placed to deliver this separately from the rest of the Pest Free programme. Pest animals, not plants - The Pest Free Banks Peninsula Initiative is focused only on animal pests, not plants which is appropriate.	Comments noted. Any increases in funding for year 3 of the LTP (2020 -2021) are likely to be considered by Council in the annual plan process for that year. Environment Canterbury supports Pest Free Banks Peninsula seeking funding from additional partners.	Yes
94	Banks Peninsula Conservation Trust	Yes	(Extract from written submission) Support - Request a further increase of \$400,000 from 2020/2021 to leverage additional funding. plus above points of PFBPWG	Support noted. Any increases in funding for year 3 of the LTP (2020 -2021) are likely to be considered by Council in the annual plan process for that year. Environment Canterbury supports Pest Free Banks Peninsula seeking funding from additional partners.	Yes
95	Paddy Stranach	Yes	More birds, more bush, better environment	Support noted.	Yes
101	Mike and Ruth Williams	Yes	The current system is not working. We need a larger coordinated effort to make any progress. We have noted a significant increase in possums in particular (and wild cats) over the last decade. We want to see the native bush have more of a chance to flourish along with accompanying native birds.	Comments noted.	Yes

Additional comments on the Revenue and Financing Policy				
Submitter ref	Submitter name	Additional submitter comments on the Revenue and Financing Policy	Staff evaluation	Wishes to be heard
1	Andrew Gilligan	Out of touch, out of control!	Submitter response does not relate to proposed changes to Revenue and Financing Policy.	No
7	Andrew McKay	You charge too much. Your salaries are too high. You employ too many. ECAN is fat and sloppy.	Submitter response does not relate to proposed changes to Revenue and Financing Policy.	No
24	Robin Barraclough	making the questions in this form simply binary, yes / no isn't very helpful for complex nuanced issues	Submitter response does not relate to proposed changes to Revenue and Financing Policy.	Yes
29	Leslie Hogbin	Who pays for sub standard levels of service?	Submitter response does not relate to proposed changes to Revenue and Financing Policy.	No
35	Steve McNeill	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.	In the Revenue and Financing Policy the rational of the costs and benefits of each programme has been described. Section 101 (3) (a) (v) of the Local Government Act states that the local Authority consider the costs and benefits, including consequences for transparency and accountability, of funding the activity distinctly from other activities. As stated on page 13-15 of the Revenue & Financing Policy, Councillors have considered the funding principles from section 101 of the Local Government Act and reviewed each programme to ensure the funding is appropriate for each. Benefit / cost is not the sole determining factor. The \$97m that Christchurch ratepayers contribute is detailed on our desktop rating tool by project. This level of project detail in the desktop tool is two levels below what is legally required at the activity / portfolio level. Of this \$97m - \$31.2m is targeted on Christchurch ratepayers and includes \$23.2m for specific Christchurch public transport projects, \$1.5m for specific Christchurch Bio diversity and bio security projects, \$5m for specific Christchurch Hazard projects (including flood protection from the Waimakariri river and Group Civil Defence readiness) and \$1.5m for specific Christchurch air projects. As Environment Canterbury uses mainly capital value rating - businesses will be paying more rates than residential properties. Environment Canterbury has considered using differentials but the additional complexity and inconsistency amongst how is it applied across the region by the ten Territorial Authorities (TA's) would make this very challenging. Targeted rating is instead used of differentials. The TA's that apply differentials are Waimate (Capital value of Urban, Rural 1, Rural 2, Electricity generators, transmission providers, Forestry operators and forest blocks rating units), Christchurch City Council (Standard, Business and Remote Rural), Kaikoura (urban, semi-rural and rural rating areas), Mackenzie (Power stations fixed rate, Capital value for residential and differential for commercial accommodation), Timaru (Accommodation, Commercial – Central or Other, Primary, Community Services, Recreational. Residential and Waimakariri (targeted rating only). There are four Councils in the region with no differentials – Hurunui, Selwyn, Ashburton, Waitaki.	No
53	Carl Sloss	I do not think it is possible to make the area pest free by the date proposed. Many locals are trapping using the traps from the trap library. Will there be a reward for every rodent / possum caught? We object to paying the proposed levy.	Pest Free Banks Peninsula is a community-led, agency-supported, landscape scale initiative, working towards the Peninsula being effectively free of animal pests by 2050. Over the first five years, the focus will be on eradicating feral goats, and controlling pests such as possums, feral cats, mustelids (ferrets, stoats and weasels) and rats. Environment Canterbury along with other agencies, community groups and local Papatipu Rūnanga agreed to collectively support the initiative late last year, acknowledging the significance of Banks Peninsula as a biodiversity hotspot.	No
86	Pam Richardson	There needs to be a "generous" contribution from the general rate. Looking after our biodiversity with pest control benefits all of Canterbury and NZ. So many beneficial ecosystem services being provided.	Comments noted.	Yes