

Summary report

Feedback on the draft Annual Plan 2020/21 and 'Better Future' survey

- 1. This report summarises written and verbal feedback received on the draft Annual Plan 2020/21 and 'Better Future' survey to support Council deliberations on changes to the Annual Plan 2020/21 and development of the Long-Term Plan 2021-31 in 2020.
- 2. Feedback on the draft Annual Plan 2020/21 was open between Monday 24 February and Wednesday 25 March. Feedback was largely received via the online portal where submitters were encouraged to answer a survey. Virtual hearings were held on 22 and 29 April. Late feedback was also received, especially given the impact of COVID-19.

Summary of feedback

- 3. 165 pieces of feedback were received, consisting of 142 pieces of feedback via the online portal and 32 hardcopies (letters or emails).
- 4. 133 individuals provided feedback, with the rest of the feedback (32) from groups and organisations including Te Rūnanga o Ngāi Tahu, Waimakariri, Ashburton and Hurunui District Councils, Federated Farmers, the Youth Rōpū, environmental groups, community boards, resident associations and recreational groups. A full list of groups providing feedback is given at the end of this document.
- 5. Most of the feedback was received from the Christchurch-West Melton community (about 60%). The Waimakariri community comprised about 14% of the feedback and Selwyn Waihora about 10%. Under 10% were from Banks Peninsula (7%), Orari-Temuka-Opihi-Pareora, (6%), Hurunui Waiau and Ashburton (both 2%). Not all respondents selected a zone, including groups who represent multiple zones or the whole of the Canterbury region.
- 6. About 60 requested to be heard and 27 individuals and groups took up the opportunity to speak to Council via online virtual hearings. The majority of those that gave feedback (90%) indicated they want to hear about the outcome of the draft Annual Plan engagement and survey.
- 7. During the engagement period, New Zealand's response to the COVID-19 pandemic escalated and the country moved to level three and then level four response. Some of the feedback, particularly in the early stages of the engagement was received before the significance of COVID-19 on the community was realised. However, there is still notable mention of COVID-19 in the feedback, particularly through the verbal and late feedback.



General feedback on the draft Annual Plan 2020/21

- 8. About half of those that gave feedback generally supported the draft Annual Plan, 30% were neutral or did not specify and about 20% disagreed with the draft Annual Plan.
- 9. Those that were generally supportive of the plan supported the general direction of Council that is signalled in the draft Annual Plan. Many specified that they wanted to see more action and funding in priority areas of public transport, biodiversity and climate change.
- 10. Those that were not supportive did not agree with the proposed rates increase of 9.8%. This is discussed below. Other reasons given for disagreement with the draft Annual Plan included general concerns about the environment such as water quality and quantity issues.
- 11. Reflective of the theme of general comments, many provided specific comments on the Transport and Urban Development, Climate Change, Hazards, Risks and Resilience, Freshwater Management and Biodiversity and Biosecurity portfolios with over 60 comments received on each. Portfolio comments are summarised below, with portfolios listed in order of the number of comments generated. More detailed staff comments in response to specific or general feedback is included at the back of this report.
- 12. Social media comments on Environment Canterbury Annual Plan Facebook posts and ads generated similar comments to those noted in the online survey including rates reduction, water bottling, climate change, and freshwater quality. Climate Change and resilience ads in week one generated over 200 comments, freshwater management in week two generated over 100 comments, and in week 4 public transport generated about 100 comments.

Proposed rates increase of 9.8% and COVID-19 response

- 13. The draft Annual Plan for engagement proposed a total rate increase of 9.8%. About 15 specifically noted they supported the rates increase for climate change action, public transport and biodiversity, with some wanting more funding for one or more of these priorities.
- 14. About 20 comments related to disagreement with the proposed rates increase of 9.8% due to their or their community's ability to pay, particularly in light of the emerging economic climate. Those opposed to the rates increase included Waimakariri District Council, community boards representing the Waimakariri community and Federated Farmers.
- 15. At the end of the engagement period, Council signalled that considering the economic implications of COVID-19 the draft Annual Plan 2020/21 should be reviewed including the review of the proposed rates increase. This was noted by some that commented later. For example, Hurunui District Council wrote "much has changed in the world since 25 March and the Council now wishes to signal to you that it is of the view that the proposed 9.8% average increase in rates is no longer palatable"



16. Options for revisions to the proposed total rates revenue increase is provided in the Council deliberations report.

Transport and Urban Development

- 17. Comments were generally supportive of the current approach being taken in Public Transport and focus of the draft Annual Plan on Public Transport, particularly the work to reduce emissions and encourage public transport patronage.
- 18. Comments that were not so supportive were due to concerns about public transport services in particular areas, and the use of rates or increase in rates to support services. For example, rates increases being used to continue bus routes that could be replaced with other options.
- 19. The majority of the those giving feedback in transport and urban development portfolio made various comments or suggestions to improve and encourage public transport as well as active transport use, including integrated urban design and transport planning, better use of freight bicycles and cycle infrastructure, reduction of farebox recovery or provision of free public transport, increase of urban density and development of commuter rail.
- Some comments were not within Environment Canterbury's remit. For example, comments about NZTA motorway projects or detailed comments about the development, design and use of cycle lanes.
- 21. Waimakariri District Council and community boards raised concerns that the rates increase was \$57 not \$30 as indicated in a previous consultation on the Waimakariri express service. The community consultation on Waimakariri bus routes in late 2019 proposing a \$30 increase in Public Transport costs was specifically focused on the cost to provision express bus services only. It was not an Annual Plan consultation.
- 22. Staff advise that the Waimakariri public transport contribution was increased above the amount in the route consultation due to an allocation of shared costs (total mobility, bus interchange, Metro Info, information technology, planning, strategy, marketing and communication etc). These costs are shared among Christchurch, Selwyn and Waimakariri residents based on the proportion of bus contract payments. Due to the new Express Services, Waimakariri's allocation percentage increased and more of the shared costs were allocated to this area.
- 23. Staff advice is that given the revisions due to COVID-19 the rates increase for Waimakariri residents for the Annual Plan 2020/21 is now expected to be lower than the \$57.
- 24. In summary, a number of comments about public transport are largely being addressed through implementation of the Regional Public Transport Plan, work of the Joint Public Transport and Regional Transport Committees and in proposals for the Long-Term Plan 2021-31. The feedback is also useful to note for the development of the Regional Land Transport Plan. Public consultation on the Regional Land Transport Plan in late 2020



will provide further opportunity to engage with the community on future aspirations for transport in Canterbury.

Climate Change, Hazards, Risk and Resilience

- 25. Within the comments in the Climate Change, Hazards, Risk and Resilience portfolio there was strong support for increased action regarding climate change. This tended to focus on greater action towards mitigation, but included greater central government advocacy, better communication of the risks and possible solutions, faster transition and adaptation in the region, and faster integration of climate change into all decision making across the organisation. There was also general support for our approach to flood protection and emergency management.
- 26. With regards to greater action towards mitigation, Environment Canterbury recognises central government's role in leading greenhouse gas mitigation policy, and as a regional council, our focus is mandated to be on adaptation. Currently, consideration of greenhouse gas emissions when determining regional plans is not a legislative requirement, however, we note that the Resource Management Amendment Bill before parliament is considering this.
- 27. While we don't have a regulatory role in mitigating greenhouse gas emissions across the region, many of our policies and plans will inherently lead to a reduction in emissions, for example: farming within limits, reducing transport congestion, managing industrial emissions to air and clean burning. Environment Canterbury is also showing regional leadership in this space by working to reduce our organisational emissions.
- 28. Clear support for increased funding towards the Regional Coastal Environment Plan and resourcing for coastal monitoring and protection was noted in some of the feedback. One individual, Genevieve Robinson, requested \$400- \$500k be allocated in this Annual Plan to progress this review of the coastal plan with urgency. Review of the Coastal Plan is discussed in the covering report. With regards to feedback on marine mammal protection, Environment Canterbury does not currently have any protection for marine mammals in its regulatory framework. Staff recommend that this request is discussed as part of the Long-Term Plan.
- 29. In summary, feedback on the Climate Change, Hazards, Risk and Resilience portfolio has been noted by staff. The draft Annual Plan 2020/21 narrative can be reviewed to see how we can better articulate how Environment Canterbury work links to climate change action and is integrated through all portfolios. Opportunities to increase visibility on climate change action through communication can also be explored within existing budgets. Wider discussions about increased action and funding for climate change and marine protection will form part of Long-Term Plan 2021-31 discussions.

Freshwater Management

30. There was general support for the Canterbury Water Management Strategy (CWMS) programme and work/direction of the Freshwater Management portfolio. Support was



signalled for continued funding of existing programmes and direction including the move from planning to implementation and focus on monitoring and data.

- 31. Concerns included comments about fish screens compliance and monitoring, drinking water and nitrates, water allocation, water quality (for ecosystem health and swimmability) and intensification in the high country. Comments mooted the need for more action on climate change, water quality and quantity, braided river management, biodiversity, soil health and urban waterways. These concerns were re-iterated in answers to the survey question on the most pressing issue for freshwater management in your local area.
- 32. Specific examples where more funding and resourcing is needed in freshwater management were given by individuals and groups including funding to implement the NPS-FM, focus on urban waterways and work to stabilise and improve water quality in the Ō Tū Wharekai (Ashburton Lakes) and braided rivers including the Rangitata, Hakatere and Waimakariri.
- 33. North Canterbury Fish and Game commented on shifting the focus from lowland to the high country, and Central South Island Fish and Game requested the alpine rivers chapter of the Land and Water Regional Plan be reviewed. Programmes in the freshwater management portfolio, including resource management planning timeframes and monitoring programmes will be reviewed in the development of the Long-Term Plan 2021-31. Priority issues noted in this feedback will considered in this review alongside central government direction.
- 34. Several comments about what zone committees should focus on in the future were made by individuals and groups. Many of these comments were prompted by the survey question noted below. The Fit for the Future project has identified how Zone Committees might be supported to move from a focus on the regional planning framework to an emphasis on delivery by establishing clear work programmes. Information about a process to revise terms of references for zone committees is coming to Council shortly.

Biodiversity and Biosecurity

- 35. Strong general support was signalled for biodiversity being a priority. Some comments indicated this priority should be further elevated with more action to protect remaining habitat and manage pests. Support for protecting what remains was the top priority within the biodiversity comments, while support for restoration and regeneration was also supported.
- 36. Suggestions were made to increase funding to support this effort, or at least maintain if budgets are constrained due to COVID-19. Areas for increased funding included biosecurity (particularly for biodiversity pests), wetlands, braided river management and data. Support for landowners through more education and proactive work was also noted. Stronger regulation and compliance were, like other portfolios, a theme and included proposals such as regulation for wetlands and more funding for implementation of National Policy Statement for Indigenous Biodiversity. Additional



- work programmes on drylands programme and climate resilient ecosystems were suggested by one individual.
- 37. Concerns were raised about the impact of pesticide use on insect biodiversity. Land-use change, and intensification was also flagged as a concern. One commented that vegetation clearance should be transferred to regional councils.
- 38. Comments on biosecurity included support for pathway management, a focus on incursion response and wilding conifer control. Specific pest issues and comments were made about the need for management of pigeons, Canada geese, Russell lupins, wallabies, cats, and spur valerian on Banks Peninsula.
- 39. In summary, given the potential economic implications from COVID-19, increased funding for biodiversity above what was proposed in this Annual Plan is not recommended by staff. Biodiversity is still recognised as an organisational priority and any proposed rates reduction does not impact on ability to deliver levels of service (activities). There will be an opportunity for larger budget changes to be considered as part of the Council's 2021-31 Long-Term Plan discussions on activities and services.
- 40. There are also potential opportunities to meet community aspirations for regeneration projects through applications to central government for 'shovel ready' projects in response to COVID-19 economic recovery.

Air quality

- 41. Feedback on the air quality portfolio indicated strong support for our current approach to improve air quality. Some concerns were raised regarding farm burns offs. There is an opportunity to clarify the impacts and rules regarding farm burn offs in the Non-Domestic emissions narrative.
- 42. Environment Canterbury regularly investigates air quality to understand the sources of the pollutants. This ensures our work remains focused on the major sources of air pollution. In Canterbury this is primarily home heating, then industrial emissions and transport emissions.
- 43. Some concerns were raised regarding reduction of transport emissions, for both health and climate change outcomes, and that transport emissions should be part of the Air Portfolio. Many concerns were also raised regarding reduction of greenhouse gas emissions and that this should be part of this portfolio. This is also addressed in the Climate Change Hazards Risk and Resilience portfolio. There is an opportunity to clarify our role in transport emissions in the Annual Plan.

Regional Leadership

44. There was general support in the feedback for Council's focus on relationships, collaboration with Canterbury councils and Ngāi Tahu, and support for community groups, youth engagement and Enviroschools. Some commented that relationships with



- councils and stakeholders could be improved and that Council should work with others in climate change action.
- 45. Leadership was a focus of some feedback with comments suggesting that Environment Canterbury is in a good position to demonstrate leadership and lead other regions.
- 46. Summit Road Society expressed in their verbal feedback the ongoing challenge of applying for community funding from various organisations and pots of money. Whilst no specific funding amounts were requested by community groups in the Annual Plan engagement, Te Ara Kākāriki requested ongoing funding support. As part of Long-Term Plan discussions, staff will provide Councillors with details on how we currently work with community organisations and seek guidance on new ways of providing support.
- 47. One individual proposed a strategy to increase voter turnout and participation. The Youth Rōpū suggested more narrative in the Annual Plan on youth engagement. Staff recommend amending the narrative to better reflect the participation role of the Youth Rōpū and youth engagement activities.
- 48. There was support through comments in this portfolio and others for more resourcing to strengthen compliance monitoring and enforcement activities. The setting of priorities for Compliance, Monitoring and Enforcement activity are reviewed by Council annually. Careful decisions are made to focus efforts on areas of highest potential risk. Regulation and compliance must be balanced with an education and awareness raising component. An organisational 5-year compliance, monitoring and enforcement plan is currently in development.

Better Future – feedback for the Long-Term Plan 2021-31

In the Better Future part of the survey a number of questions were asked to help inform the development of the Long-Term Plan 2021-31.

Our current purpose statement is: Facilitating sustainable development for the Canterbury region. Should we change it?

- 49. 54% of respondents to this question said yes we should change it, 30% said no and 11% weren't sure. Of those that said yes change it, common words proposed for inclusion included building resilience, environment, climate change, future-focused and leading. Others thought that the term sustainable development should be removed, replaced or amended to take into account environmental and economic effects.
- 50. Those that commented it should remain the same thought that the statement was broad enough and reflected Environment Canterbury's purpose.

What is the most pressing issue for freshwater management in your local area? And why is this issue important to you?

51. 112 commented on issues including nitrate and phosphate, plastic, faecal contamination and implications of contamination on water quality, drinking water,



recreation and ecosystem health. Water use and allocation (irrigation, water bottling) and the impact of urban development and agricultural intensification were also noted as issues of importance.

Are you aware of the role of the Water Zone Committee in managing freshwater in your area?

- 52. 73 respondents said yes they are aware of the role of the zone committee and 52 said no. 55 went on to comment on what they thought Zone Committed should focus on.
- 53. Issues mentioned that zone committees should consider included nitrate contamination, water flows, over allocation and water storage and freshwater quality and biodiversity. Specific areas and ecosystems mentioned included urban waterways, braided rivers, Wakanui Creek lagoon and local streams.
- 54. Ideas for activities that zone committees should focus on included education and advocacy, encouraging public participation and facilitating on-the-ground work, rather than setting planning frameworks. Focus on achieving targets, incorporating more cultural values into monitoring system and more collaboration between committees/a greater regional focus were other suggestions given.
- 55. Some did not agree with the zone committee approach whilst others thought they could be repurposed or the number of committees or committee size altered.

What impact do you think climate change will have on you and your community?

56. 103 took the opportunity to comment on this question. The most common responses were changing and extreme weather events, sea level rise, drought, disruption to lifestyle, agriculture and food supplies and significant effects on ecosystems.

What do you think we can do to improve the region's resilience to climate change and natural hazards?

- 57. 105 responded to this question. The most frequent response was planting, particularly native planting. Related to this theme, protection and restoration of habitats was also mentioned several times. Other common responses were:
 - careful allocation of resources
 - flood protection
 - public transport utilisation
 - green energy (instead of fossil fuels)
 - zoning of land
 - managed retreat
 - working with others to respond and educate/inform
 - gather information and learn from overseas examples
 - lobby central government to act now and regulate
 - harness opportunities and innovations
 - diversify land use e.g. production of different crops.



58. Concerns about food security were noted by a few who proposed development of a food resilience strategy, working with others including Canterbury councils.

What's the biggest change we could make now to protect the environment for future generations?

- 59. 113 responded to this question. Key themes of responses were biodiversity, biosecurity and planting, climate change, public transport, urban development and land use, freshwater management and community engagement.
- 60. Similar to responses to other questions, opportunities for native planting, protecting what remains and biosecurity as a tool were noted as important changes to protect the environment and biodiversity in Canterbury.
- 61. Many responses were focused on climate change action and made comments on cleaner energy, public transport and greener homes initiatives to reduce greenhouse gas emissions. Some commented that climate change should be a standing item on every council agenda.
- 62. On land use and freshwater management, restricting development (building), reducing focus on dairying and diversifying what grow and use land for were the main themes of the comments. Similar to other responses, protecting water quality and resources for the future was important to some respondents.
- 63. A number of responses noted that education, behaviour change initiatives, community engagement and working and empowering others were important things that we could be doing to protect the environment.

Should Environment Canterbury lead a bold, region-wide planting and regeneration programme?

- 64. The vast majority of respondents said yes (107). 12 said no and 8 didn't know. A quick poll accompanying the survey asked 'Would you get involved in community planting?' 116 people responded, of these more than 58% indicated they were involved already or wanted to get involved, 22% wanted to find out more and 19% were not interested.
- 65. 89 commented why they put yes. Common reasons included climate change adaptation and mitigation, biodiversity gains, erosion control, soil retention, community wellbeing, landscape and aesthetic values, and air quality. Some commented that action to carry out this work was overdue and should be urgently progressed. Some commented on opportunities to create jobs and involve the community.
- 66. Some comments cautioned the need to carry-out careful planning to ensure adverse outcomes from planting do not eventuate and that Environment Canterbury should lead this work as we offer the regional view others lack. Others commented that the focus should be on regeneration and protection of remnants, e.g. fencing/pest control.
- 67. Those that said they no had concerns about the budget implications or what the costs would involve given that community groups could be supported to carry out this work.



How much effort should we direct into protecting Canterbury's unique braided rivers and wetlands?

- 68. 107 respondents said more effort should be directed to braided rivers and wetlands, 3 said less, and 15 said the same. 84 of the 107 respondents commented on why more effort should be directed, whilst all of those that said no gave a reason and half of those that said the same effort.
- 69. Those that commented more effort should be directed commented that braided rivers are unique to Canterbury and that urgent protection is needed given their vital importance to biodiversity and ecosystems. Benefits of braided rivers and wetlands noted included aesthetic qualities, resilience for water drought in future, flood protection management and tourism benefits. Support was noted for efforts to date.
- 70. Ideas were offered about the kind of effort needed to protect braided rivers and wetlands. These ideas included implementation of a regulatory framework, control of irrigation/water flows and prosecution. Some supported budget increase e.g. for land purchase and urban waterways action.



Summary of feedback points and staff advice

Tran	Transport and Urban Development		
	Feedback comment/s	Staff advice	
1.1	Reduce transport emissions	Environment Canterbury recognises the importance of reducing transport emissions. The Regional Public Transport Plan states that Environment Canterbury will develop a suitable investment programme to enable the transition to a fully zero emissions fleet as soon as possible, and that new buses will be zero emissions wherever practicable. To illustrate, the recent completion of the bus procurement process has reduced public transport CO ² emissions by 14% within a year. In 2020/21 we will introduce 25 new electric buses and 39 new low emission Euro-6 buses.	
		Vehicle exhaust emissions tests would need to be enabled by Central Government legislation, so could not be implemented by Environment Canterbury of its own volition.	
1.2	Public transport funding model	Public transport in Christchurch and Canterbury is heavily subsidised. The current funding model for public transport involves matched funding from local and central government. Until this model is adjusted, Environment Canterbury must budget through its annual plan using the matched funding model.	
1.3	Reduce farebox recovery	We would note that farebox recovery policies have eased as reflected in the 2018 Regional Public Transport Plan. This stated the key difficulty remains that of achieving greater engagement with our services (namely increased patronage), and this may involve ongoing increases in expenditure to ensure services fit expectations.	
		The principal issue is not the level of financial support but the level of active engagement with services. Environment Canterbury and partner agencies are currently investigating proposals aimed at significantly improving services and infrastructure with a goal of increasing direct engagement with our services (growing patronage). Both the Future Public Transport Business Case process and a likely review of fare methods will feed into proposals that will be incorporated in the Long-Term Plan 2021-31.	
1.4	Make public transport free	Currently fares contribute around \$20 million dollars for public transport funding in Canterbury. If free fares were introduced Environment Canterbury would need to replace this income through increases in rate contribution. A rate increase of the magnitude required to address fare revenue would be significant and would impact on all	



		ratepayers, particularly those in Greater Christchurch. Christchurch fares are among the cheapest in New Zealand. A fare benchmarking report from 2019 indicated that Christchurch fares were 46% more affordable than comparable fares in Auckland and 37% more affordable than Wellington.
1.5	Encourage active transport, better cycling options and incentives, more multi modal options	The new Regional Land Transport Plan (RLTP) is being developed in 2020/21 by the Canterbury Regional Transport Committee. This plan will take account of the key transport-related issues, objectives and outcomes across the region in identifying a programme of priority transport activities across Canterbury. This feedback is best considered through the development of the Regional Land Transport Plan (RLTP). The RLTP will be subject to public consultation, which is scheduled for the end of the 2020 calendar year.
1.6	Support for on-demand transport in Christchurch and expansion of the Timaru MyWay project	The Timaru MyWay project is a trial of how demand responsive transport could be rolled out in local communities. Staff acknowledge the support for the concept and note that an assessment of the outcomes of the project will need to be undertaken before additional demand responsive transport services are considered.
1.7	Comments about frequencies of public transport and patronage, action to incentivise and encourage patronage	The 2018 Canterbury Regional Public Transport Plan (RPTP) is premised on increases to public transport service levels, particularly frequencies. This includes services to Rolleston and the wider Selwyn District. Proposals within this Annual Plan for frequency improvements on some Christchurch public transport routes are the first phase in implementation of the RPTP. The Greater Christchurch Future Public Transport Business case process, which is currently underway, involves
		reviewing future investment (including proposed frequency changes) to ensure they deliver the desired outcomes in terms of patronage increases. Results from this process will feed directly into 2021-31 Long-Term Plan development.
1.8	More multi modal approaches including rail	We are working with partner agencies, including territorial authorities in Greater Christchurch and Timaru, on improving public transport and on travel demand management programmes that highlight the advantages of different transport choice. Multi modal linkages are also being considered as part of this process as well as a Mode Shift Plan that is currently being developed by the NZTA with input from other Greater Christchurch partner territorial authorities.
		Currently, rail from Hurunui is not envisaged as part of this process, as partners are concentrating efforts on improving services in Greater Christchurch (Christchurch City and Eastern areas of Waimakariri and Selwyn Districts).



1.9	Delivery of public transport through council owned entities	How public transport is delivered throughout New Zealand is determined by central government through the Land Transport Management legislation. Environment Canterbury, along with all territorial authorities, engages with central government in an advocacy role to ensure that this legislation is appropriate and fit for purpose.
1.10	Waimakariri targeted rate increase and public transport service	The service changes in Waimakariri District followed considerable engagement with local interests. Over 750 submissions on the proposals were received and the majority of respondents were supportive of what was proposed and the need to finance some of the expense through small increases in rate contributions from affected communities.
	Waimakariri District Council proposal to delay Park and Ride till July 2021	Waimakariri District Council and community boards raised concerns that the rates increase was \$57 not \$30 as indicated in a previous consultation on the Waimakariri express service. Staff advise that the Waimakariri public transport contribution was increased above the amount in the route consultation due to an allocation of shared costs (total mobility, bus interchange, Metro Info, information technology, planning, strategy, marketing and communication etc). These costs are shared among Christchurch, Selwyn and Waimakariri ratepayers based on the proportion of bus contract payments. Due to the new Express Services, Waimakariri's allocation percentage increased and more shared costs were allocated to this area.
		Staff advise that given the revisions due to COVID-19 the rates increase for Waimakariri residents for the Annual Plan 2020/21 is expected to be lower.
		Park & Ride services are infrastructure related and are provided by Territorial Authorities. Waimakariri District Council is implementing Park & Ride in its district in support of the express buses and the Christchurch Northern Corridor project. The delay of the delivery of Waimakariri express services impacts a wider package of partner investments and interventions in support of the Christchurch Northern Corridor project. On Park & Ride, the issue of Express Buses and Park & Ride needs to be discussed at a partnership level as these two projects are integral to the successful delivery of the Christchurch Northern corridor and High occupancy Vehicle Lane project, of which NZTA, CCC, WDC and Environment Canterbury are collaborating on. A decision to defer the start of this service needs to take into account the wider partner context for this project. Staff are engaging with partners on this and will advise soon.
1.11	Comments on Lyttelton services	The 2018 Canterbury Regional Public Transport Plan is premised on increases to PT service levels, particularly frequencies. Lyttleton is included in these service level improvements.



	Climate Change, Hazards	, Risk and Resilience
2.1	Climate change as a standing agenda item. Increased action to reflect climate change emergency	Council are actively considering opportunities for more visibility and transparency about Environment Canterbury action for climate change, including through Council meetings and this work will continue in the Annual Plan. For example, on the one-year anniversary of Environment Canterbury declaring a climate change emergency, communication activities were carried out.
2.2	Central South Island Fish and Game requested a commitment from this council to create a boater's guide with all information in one document, as committed to by the previous council	This was delayed as it was contingent on national information. There were also delays due to lack of staff availability. However, staff expect this work to be completed in the near future and it can be done within existing budgets.
2.3	Incorporate the new approach to braided rivers with our current flood protection scheme.	Comments have been noted by staff.
	Freshwater Management	
3.1	Concerns regarding nutrient losses	Changes to the Land and Water Regional Plan and through sub- regional plans have introduced greater reductions in nutrients lost from farming practices to limit the effect of different land uses on water quality and includes reduction in allocation in catchments where community outcomes are not being achieved. Any further changes will be discussed through the development of the Long-Term Plan 2021-31.
3.2	Concerns regarding the stormwater issues and climate change impacts	Environment Canterbury works with territorial authorities to limit the negative impact of stormwater on water bodies in a number of ways. Environment Canterbury works closely with TAs applying for stormwater consents, in responding to oil spills and trialling roadside cutting designs to reduce sediment run-off from hillsides to waterways. Environment Canterbury has also worked with Christchurch City Council and the Christchurch West



		Melton Zone Committee to raise awareness of the stormwater network and its impact on urban waterway through the "Stormwater Superhero campaign".
3.3	Concerns regarding fish- screen compliance	Updates on Environment Canterbury's fish screens compliance project can be found online here: https://www.ecan.govt.nz/get-involved/news-and-events/2017/fish-screens-whats-the-story/ The five year plan includes working with industry and consent holders to ensure fish screens are effective as well as ongoing monitoring of their effectiveness.
3.4	Request to review LWRP Chapter 12 - Alpine rivers.	The RMA planning programme will be reviewed and changed made through LTP.
3.5	Request to shift focus to High Country over lowland Canterbury	Environment Canterbury is aware of the shift to intensify low gradient high country land. This is evident in the Ashburton Lakes and the Ahuriri Arm of Lake Benmore. Such issues are being considered for the planning schedule alongside direction to be provided through the NPS-FM as part of the LTP.
3.6	Impact of water quality and quantity on biodiversity	Environment Canterbury reports annually on a number of factors that can impact biodiversity. Any changes to water allocation would be managed under the RMA planning framework and discussed through LTP planning.
3.7	Integration between biodiversity and freshwater management	The Freshwater and Biodiversity & Biosecurity Portfolio staff work closely together to ensure that a coordinated response to freshwater biodiversity is managed. The Environment Canterbury rates tool online outlines how expenditure is managed across these portfolios
3.8	Implications of revised National Policy Statement for Freshwater Management on funding	At this time, we await the finalised policy direction on the NPS-FM from central government so that we can determine its impact on the regional council. Environment Canterbury's policies and RMA framework are relatively advanced in the areas identified in the NPS-FM especially around managing to limits, stock exclusion and the need for Farm Environment Plans (FEPs) and Farm Auditing. The impact of the NPS-FM has been considered under the planning schedule and an evaluation of the impacts on science and monitoring under the Environmental Reporting and Progress Monitoring programme will be completed as part of the LTP.
3.9	Make targets more outcomes focused	Include text to expand on Fit for Future project - and increasing focus on outcome reporting through the Targets Progress reports (through LTP).



	Biodiversity and Biosecu	rity
4.1	Prioritise protecting and enhancing existing biodiversity over revegetation	The Canterbury Biodiversity Strategy takes a strategic approach and given the extent of biodiversity loss that has already occurred in Canterbury, avoiding further loss requires that we focus as a first priority on protecting and sustaining the most threatened and ecologically significant remaining habitats and ecosystems and the linkages between them, and as a second priority, restoring representative habitats and ecosystems that have been lost or severely degraded.
4.2	Amend sentence on p7 to: "This includes a focus of increased action on the ground and working with landowners to provide information and incentives to invest in maintaining and restoring biodiversity".	Minor wording change. Aligns with Environment Canterbury strategic priority of creating a step-change in effort in the regeneration of biodiversity, by halting the decline, maintaining and restoring indigenous habitats and ecosystems.
4.3	Ōpāwaho Heathcote River Network request weed management programme	The specific suggestion for a weed management work programme for the Ōpāwaho Heathcote River and the development of an ecological corridor could be considered as a biodiversity project that can be assessed and undertaken by the Christchurch West Melton Zone Team and leveraging the Environment Canterbury relationship with CCC and the community. Staff will follow up with Ōpāwaho Heathcote River Network on their feedback.
4.4	Clarity on reduction in expenditure for wetland programme	The wetlands budget will remain the same in 20/21 as 19/20 rather than increase by \$100k as the LTP proposed. This was part of a budget reduction exercise across the Portfolio mid-year.
4.5	Develop strategy/start planning for including more wetland restorations in the LTP	The RMA planning framework provides rules to protect wetlands. The Level of Service in the Annual Plan focuses on working with willing landowners to protect and maintain wetlands. This is a proactive workstream to educate and inform the landowner on the importance of the wetland on their property and potentially provide further



		assistance to protect and maintain the wetland. The wetland programme will be reviewed as part of the development of the LTP.
4.6	Is one braided river plan a year enough?	Braided River Advisory Group (BRAG) work this year has focused on LINZ, DOC and Environment Canterbury identifying land ownership and management across the 7 major braided rivers (and some parts of other rivers) in Canterbury. Territorial Authorities and other BRAG members have had less involvement in this part of the project, particularly over the past 6 months. The number of ki uta ki tai plans to develop is an LTP question.
4.7	BRAG needs to start defining good practice management in BR margins (to meet LOS 9)	Correct land ownership data is fundamental to best practice land management. There are hundreds of hectares of land adjacent to braided rivers that are occupied and used without a lease or licence from the landowner. Ownership is necessary to determine appropriate and legal occupation. The agencies involved in BRAG (Environment Canterbury, LINZ, DOC and some TAs) have drafted best practice management guidelines for their own land but these have not yet been discussed in depth with the wider BRAG group, including the group who provided feedback (CSI F&G).
4.8	Landowner support - increase transparency around available funding	Landowner support is expected to continue. More communication on funding rounds and timeframes can be addressed in-house.
4.9	Transfer responsibility for all biodiversity management to ECan, and to align with NPSIB.	Environment Canterbury staff are developing the project scope for the review of the Canterbury Regional Policy Statement (CRPS), for discussion with and confirmation by Councillors. This will include discussion on the management of indigenous biodiversity and how the responsibilities are split between Environment Canterbury and territorial authorities, with particular reference to the proposed National Policy Statement for Indigenous Biodiversity. We anticipate more detailed work on the review will start in the second half of 2020, with a view to notifying a new CRPS in 2023.
4.10	Increase funding for predator free initiatives and pest surveillance.	Environment Canterbury has an extensive biosecurity programme that supports biodiversity. This includes specific support for landscape scale programmes such as Pest-free Banks Peninsula, which has a dedicated coordinator role and supports the development and resourcing of pest-free community groups. Environment Canterbury also enables smaller scale community predator-free initiatives, and well as carrying out biodiversity projects in braided river, wetland and terrestrial ecosystems where pest control is an important action. The Biosecurity Programme is currently working towards a shift in focus and resources from widespread pest species to management (including surveillance) of pests and organisms of limited distribution that have a high impact on regional biodiversity and economic values.



4.11	Request for increased funding in Mackenzie for pest control	Occurring within existing budgets. Environment Canterbury has increased biosecurity funding in the Mackenzie Basin for pests that we have responsibility to manage (i.e. where landowners have opted for a user pays model). Funding for both wallaby control and the wilding conifer programme has increased, and the Canterbury wilding conifer programme has recently received an additional \$2 million in funding from central government as part of the COVID-19 workers relief response. For other pests in the RPMP, the responsibility for control lies with the landowner and Environment Canterbury's main role is in compliance.
4.12	Promote indigenous planting to reduce emissions	Environment Canterbury is considering comprehensive planting and regeneration programmes which respond to indigenous biodiversity and climate change issues. Any proposals will be included in the 2021-2031 Long-Term Plan process.
4.13	Add drylands programme and climate resilient ecosystems programme	Any changes and/or increases to the number or scope of large work programmes is better considered in the context of the part of the Council's 2021-31 Long-Term Plan discussions. Environment Canterbury's 2020/21 Annual Plan is seeking to reduce rates increases. In response to the specific matters raised, climate change is considered a significant factor in, and integrated across, all Environment Canterbury portfolio considerations, including the Biodiversity and Biosecurity Portfolio. Territorial authorities are responsible for specifying the objectives, policies and methods for the control of the use of land for the maintenance of indigenous biological diversity on all land outside of wetlands, the coastal marine area, and beds of rivers and lakes i.e. dryland ecosystems.
4.14	Start developing an insect biodiversity/pesticide reduction programme for LTP	An insect biodiversity/pesticide reduction programme does not currently exist. Environment Canterbury supports the MBIE Valuing Insects programme, which seeks to find out more about the benefits of conserving insects within agricultural landscapes. Advice will be sought from others working in this area and if there are opportunities this will be discussed in development of the Long-Term Plan.
4.15	Increase of staff in Ashburton zone	Environment Canterbury zone delivery staff include experienced Biodiversity Officers with the ability to access assistance from other Environment Canterbury staff throughout the region. Environment Canterbury supports staff from other organisations with biodiversity roles and responsibilities in these areas but cannot undertake those roles for them.
4.16	Make explicit commitment to eco-sourcing	Environment Canterbury requires ecosourcing for the projects it supports.



4.17	Amend LOS 10 to include wetlands. Amend Target 10.1 to include progress reporting on Wetland Actions Plans.	LOS 10 refers specifically to wetlands. The purpose of wetland action plans is to work with willing landowners on protection and maintenance of natural wetlands. Implementation reporting is not required by the LOS. Staff work with landowners to develop and implement the plans, providing technical and sometimes financial support.
4.18	Stronger link between freshwater and biodiversity	Biodiversity outcomes sought through the Biodiversity and Biosecurity Portfolio are closely related to, and supported by, work delivered through the Freshwater Management Portfolio, including programmes/projects addressing water quality and quantity issues. This link could be made explicit with a minor amendment/addition to the Annual Plan narrative.
4.19	Reinstate commitment to producing at least one braided river action plan annually.	While the wording has changed, the commitment to produce one plan annually remains.
4.20	Recommend review of RPMP and contribution of rates	Environment Canterbury have recently completed a review of the CRPMP (2018). The Biosecurity Act 1993 in currently under review, and we are unlikely to review the CRPMP until we see the outcome of this national level review. Overall, the CRPMP programmes contain a roughly equal mix of biodiversity-focused and production-focused pest management. This results in a 50:50 rate contribution of general rates (for biodiversity pest management) versus targeted rates (for production pest management).
4.21	Add pigeons as a pest to RPMP and help prevent/control pigeons	It is unlikely that feral pigeons would meet with Biosecurity Act 1993 Cost Benefit Analysis criteria for inclusion as a pest on the Regional Pest Management Plan. The following staff advice was accepted by the Hearing Panel at the time of the most recent CRPMP review: 'Staff do not consider that it would be possible to achieve an objective of sustained control for rock pigeons as they are widespread throughout New Zealand'.
4.22	Expand wilding conifer programme	Already in existing budget. The wilding conifer programme is being expanded, with \$7.9 million allocated for 2019/20 and a further \$3 million for 2020/21. The programme is currently working across an area of 2.2 million hectares. The Canterbury wilding conifer programme has recently received an additional \$2 million in funding from central government as part of the COVID-19 workers relief response



4.23	Wallaby control methods and assistance	There is currently no tool available for wallaby control that would meet the requirements proposed by the individual for ethical control of wallaby (preventing reproduction rather than the ineffective culling method which only reduces numbers temporarily). Land occupiers have elected for a 'user pays, user does' model for wallaby control. There is an existing programme in place for wallaby control, with land occupier responsibility for management within the Containment Area.
4.24	Spur valerian control in Banks Peninsula	Spur valerian is widespread in Christchurch/Banks Peninsula and occurs throughout Canterbury. Declaration as a pest in the RPMP, with rules requiring land occupier control, would not be viable due to its widespread nature and habitat. A site led programme may be possible, but would require buy-in from land occupiers and declaration for this purpose would not achieve more than a cooperative effort as at present.
4.25	Control Canada Geese population	A Canada Geese Management Plan is already in place, involving Environment Canterbury, Selwyn District Council, Waimakariri District Council, Ngãi Tahu and Christchurch Airport.
4.26	More effort on Russell Lupins	Wild Russell lupin is a pest in the RPMP and is subject to rules to prohibit planting and require elimination of plants adjacent to waterways (including braided rivers) and property boundaries. Environment Canterbury contributes to some wild Russell lupin control work and prioritises keeping clear areas free from wild Russel lupin and controlling discrete isolated populations. For example, this year Environment Canterbury worked with DOC to control wild Russell lupin along the Dobson River as part of the Te Manahuna programme. Environment Canterbury are currently in the process of acquiring distribution data on wild Russell lupin. This will provide valuable information for where to focus management efforts, including implementation of CRPMP rules for Russel lupin.
4.27	Control feral cat populations	Feral cats are not declared as a pest in CRPMP but are able to be controlled by community groups as part of biodiversity site programmes.
4.28	Biosecurity control for marine pests	This requires national leadership and guidance from MPI to ensure consistency of approach across New Zealand. Currently, the coastal plan is due for review and notification in 2023. The current budget will focus on re-structuring and issues that would not require extensive technical work. Additional technical work to survey marine biodiversity and biosecurity was not budgeted to be addressed as part of this Coastal Plan review and would require additional funding. Currently the coastal plan is due for review and notification in 2023. Leading consultation (including with Fisheries New Zealand, who have a key role in managing fisheries stocks), and any research and protection of



		shellfish stocks in the Avon/Heathcote Estuary/Ihutai was not budgeted to be addressed as part of this Coastal Plan review and would require additional funding.
4.29	Closely monitor land use change in the Chch Red Zone to protect water quality	The water quality monitoring programme is carried out with established permanent monitoring stations. No changes to the location or the construction of new monitoring stations are being considered in this Annual Plan.
4.30	Disagreement with non- statutory plans -	Environment Canterbury is using the ki uta ki tai plans to encompass a broader range of issues and actions than a statutory plan. These areas (and specifically activities within them) are subject to RMA plans now. The new work will provide further opportunities for stakeholder engagement in a shared vision, with the delivery work shared by partners.
	Air Quality	
5.1	Concerns about farm burn offs/ non-domestic emissions	There are rules in the Canterbury Air Regional Plan which provide buffer zones around Ashburton and Timaru to reduce community exposure to smoke from burn offs. Farms must also control the smoke through a Smoke Management Plan. We continue to work with farmers, FENZ and the Foundation for Arable Research to improve the management of burn offs.
5.2	Monitor/control greenhouse gas and transport emissions	Our regulatory responsibility covers stationary sources of pollutants. Under the legislative framework (RMA) we currently cannot make rules to manage the effects on greenhouse gas emissions on climate change. Transport emissions are not regulated at the regional level. The main piece of legislation for reducing the release of harmful emissions from vehicles is the Land Transport Rule: Vehicle Exhaust Emissions 2007. The 2007 Rule sets emissions standards for vehicles entering the New Zealand fleet and controls emissions for vehicles already in the New Zealand fleet. The Ministry for Transport provides the government policy advice on vehicle and vessel emissions. We advocate for reduced emissions when there is an opportunity to make a submission
5.3	Subsidies for commercial schemes, more healthy home programmes	Demand and reach of Healthier Homes Canterbury is considered by the Healthier Homes working group. Further advice about Healthier Homes Canterbury going forward will form part of Long-Term Plan discussions. Discussions are currently occurring with CCC regarding opportunities to build on the Healthier Homes initiative within the city.
	Regional Leadership	



6.1	Comments on benefits for payment, transparency of rates funding and projects, the online rating tool and levels of service	Through the 2018-28 Long-Term Plan the Revenue and Financing Policy was consulted on. The Policy was further amended as part of the 2019/20 Annual Plan. The Revenue and Financing Policy advises of the rating principles and who the Councillors believe benefits from each programme/service. As part of the 2018-28 Long-Term Plan a bubble rating tool was created to assist with providing more transparent rating information by project and on a map (above the statutory requirement). Environment Canterbury continues to refine and develop this tool. The names of each project will be further refined in the next Long-Term Plan 2021- 31 as part of a chart of accounts review. Environment Canterbury has endeavoured to provide commentary about the projects on the side bar within the rating bubble tool. Levels of service are proposed each Long-Term Plan and we welcome any proposed rewording of these levels of service as part of submissions in this process. Environment Canterbury needs to ensure that its levels of service are measurable but often this difficult as we partner with many organisations to achieve our outcomes and we cannot achieve whole levels of service on our own.
6.2	Increase profile of youth engagement and participation	Youth engagement and education at Environment Canterbury is important to us and we are continuing to build and strengthen the relationship between young people, our region and the work we do. The Environment Canterbury Youth Rōpū is now into its second year of existence. Our Youth Rōpū is a voluntary group of people aged 14-24, who are enthusiastic about the environment, developing leadership skills and being part of a team to increase youth engagement and the youth voice. With regards to Enviroschools, this is a nationwide programme that helps us to build a sustainable future for Canterbury, and we will continue to support the programme, and ensure to the best of our ability that other territorial authorities in Canterbury support it as well. Enviroschools relies on funding from a number of sources, and there are already many schools on a waiting list to join the programme.
6.3	People don't know what we do, how to participate:	Improving engagement levels with the community is a focus of the current Council and we have existing Levels of Service regarding focusing on those sectors that are underrepresented. This work will continue into this Annual Plan, particularly through the formation of a new Working Group of Council for Public Visibility. Work is also being done to help the community to better understand how a regional council works, what we work on, and importantly how the community can participate in that work and influence it. Participation is measured by us as feedback to Annual Plans, Long-Term Plans, RMA plans, notified consents, deputations, as well as voter turnout – all of which require understanding and interest in our work.
6.4	Increase voter turnout	Given the results of the national campaign to boost voter turnout at the last election, the Canterbury turnout was not exceptional. The Council does however want to see more people engaging with what the Council does and therefore wanting to influence who the elected members are. Voter turnout is impacted by many external factors



		so putting a figure on what % increase we may be able to achieve may not be as effective as putting measures in place around work to increase knowledge of the work that Council does, and specifically targeting those groups who we know are under represented.
6.5	Engage with youth on future long-term plans	As we head into Long-Term planning, it is important that the youth voice is heard while the early drafts of the Long-Term Plan are developed. The Youth Engagement and Education Team will work with the Youth Rōpū on this. We will also work with the Youth Rōpū when the final draft of the LTP is put out for consultation to the community, to gather a wider perspective from young people to inform the final plan prior to adoption.
6.6	Youth engagement and participation and lack of mention of youth ropu	The Youth Engagement & Education Team, and the Environment Canterbury Youth Rōpū are committed to working with young people in particular. Change introduction to Regional Leadership narrative, to add Youth Rōpū, e.g. add a new paragraph. In 2019, the Environment Canterbury Youth Rōpū was formed. The Youth Rōpū is a voluntary group, aged 14-24, who ensure the youth voice is heard at Councillor level, to promote the environmental issues they care about. In the 2020/21 year, the Youth Rōpū will continue to connect with Council, staff, people and groups to build on and grow these relationships. Staff also suggest changing LoS target 31.2b to Lift engagement and participation rates of sectors that are identified as being less engaged, including the young people of Canterbury through a commitment to listening to the youth voice via the Youth Rōpū and other means (2019/20 onwards).
6.7	Democratic principle of one person per vote. Manage down funding of large executive salaries	A representation review was undertaken in 2019. A final proposal was developed from the consultation and the Local Government Commission approved the representation for elections. The Remuneration Policy for staff is based on local government and general market data for their roles.
6.8	Clarity on proposed increase of over \$3.2 million in 2020/2021 for Plans, Consenting and Compliance presumably includes amendments to Regional Plans and the Regional Policy Statement	The expenditure change within the Plans, Consenting and Compliance programme relates to a Regional Policy Statement cost increase (as stated), however, it is also due to a change in consent application and consent monitoring/compliance expenditure. This consent related expenditure is majority user pays funded and the expenditure increase reflects a revision in the volume and complexity of consents expected to be processed and monitored within the next year. The increase in the Strategy and Direction and the Governance and Engagement programme budgets are not overall organisation budget increases but rather a reallocation of which programme these costs sit within.



6.9	Question on Council decision note to consult given proposed rates increase	Under section 95 (2A) of the Local Government Act 2002 Environment Canterbury Councillors resolved that the 2020/21 annual plan did not include significant or material differences from the content of the Long-Term Plan 2018-28 (year 3). Following the Long-Term Plan 2018-28 consultation Environment Canterbury, in September / October 2018, completed another consultation process on the Regional Public Transport Plan (RPTP). The RPTP consultation resulted in 4% of the proposed 9.8% 2020/21 Annual Plan rate increase. Given the community view had been canvassed through consultation on the RPTP further consultation on the Annual 2020/21 was not deemed necessary.
6.10	Use of UAGC (Ashburton District Council)	Through the 2018-28 LTP the previous Councillors debated the Revenue and Financing Policy - what should be included in the Uniform Annual General Charge (UAGC) and the affordability issues with UAGC. Staff advise that during the development of the LTP 2021-31 Councillors will have the opportunity to revise what services should be funded via the UAGC.
6.11	Te Ara Kākāriki request an ongoing funding commitment to the Te Ara Kākāriki Greendot and Kids Discovery Plantout programmes.	Funding from the Whakaora Te Ahuriri project allocated to TAK will be carried over from financial year 19/20 for plant out projects. As part of LTP discussions, staff will bring to Councillors details on how we currently work with community organisations and seek guidance on new ways of providing support.
6.12	Disconnect between the words expressed in the body of the draft Annual Plan and the actions and outcomes expressed as measures and targets	Levels of service, measures and targets will be revised in the LTP.
6.13	Food resilience strategy developed with all council	Initiatives such as food resilience strategy will be considered in development of LTP.
6.14	Better monitoring and enforcement	Compliance monitoring and enforcement policies and procedures used within Environment Canterbury are consistent with the best practice guidelines published by the Ministry for the Environment and the Council



		conducts audits of its CME function to ensure that they meet MfE guidelines Our enforcement policies are regularly reviewed.
6.15	Council needs to conduct its compliance activities in a fair, effective and efficient manner.	Environment Canterbury always seeks to conduct it compliance activities in a fair, effective and transparent manner. Where a member of the community believes that we have failed to achieve this in a particular instance, we encourage them to raise this formally with us, so we can undertake an investigation. There are legislative mechanisms in place which ensure that the Council undertakes any investigation in a fair and transparent manner.



LIST OF GROUPS THAT GAVE FEEDBACK

- Te Rūnanga o Ngāi Tahu
- Waimakariri District Council
- Hurunui District Council
- Ashburton District Council
- Youth Rōpū
- Federated Farmers
- Central South Island Fish and Game
- North Canterbury Fish and Game
- Royal Forest & Bird Protection Society of New Zealand Inc. (Forest & Bird)
- Woodend-Sefton Community Board
- Oxford Ohoka Community Board
- Rangiora-Ashley Community Board
- Halswell Residents Association (Inc.)
- Beckenham Neighbourhood Association
- Braid: braided river aid
- Te Ara Kakariki
- Upper Waimakariri Group
- Te Ara Kākāriki Greenway Canterbury Trust
- Ōpāwaho Heathcote River Network
- Ryman Healthcare
- Generation Zero Christchurch
- Federation Freshwater Anglers
- Christchurch International Airport Ltd
- Spokes Canterbury
- Summit Road Society
- Mackenzie Guardians Inc.
- Inner City East Linwood Revitalisation Project Working Group
- KOA Canterbury
- Pest Free Banks Peninsula / Te Pātaka o Rākaihautū
- Aetern
- QEII