

Proposed Plan Change 7 – Waimakariri

My name is Frank Hill.

I am not a member of Forest Bird, Federated Farmers or any other related group that make use of water in Canterbury. I am also not a member of any political party or organisation. I live in St Albans with my wife and 2 children.

As an experienced Commercial Property Manager I do have a working knowledge of the RMA and the consenting and planning processes.

With the removal of elected councilors I have followed the water debate in Canterbury as closely as time has permitted. I have no time for Dictatorships and Government intervention at ECAN has been a disaster. I attended most CWMZ committee meetings from 2015 and up to 22 February 2018 (when the CWMZ and Waimakariri Zone committees first met to discuss this plan change) I have followed this plan change closely and have attended public meetings arranged by Waimakariri Zone Committee in Kaipoi and elsewhere.

As a general update from my original submission I would like to add the following comments:

- Massive regulatory failure to allow dairying on porous soils.
- Urban public have given up communicating with ECAN. The only Collaboration occurring is between ECAN and its strategic partners. Everyone else gets ignored. The Government is however listening.
- The government has made its position clear that GDP and economic growth are no longer to be put ahead of sustainability – “Environment First” (First order Priority in CWMS – but ignored)
- Need to consider cost – Over \$100M annually for Christchurch City Ratepayers (\$44m on Capex, \$32m operational + CWMS ~ \$23-25M.) + increased cost of Colorectal cancers (up to \$142M nationwide) +++
- Fully support intention of NPS-FM20 – ie
 - prioritising the health and wellbeing of water bodies, then the essential needs of people.
 - NPS - tougher national bottom lines for the ammonia and nitrate toxicity attributes to protect 95% of species from toxic effects (up from 80%)
 - 30 Year timeframe – not 2070. If ECAN is 10 years ahead then 2040.
- 3.8Mg / l target only achieved at end of 2070.
- Fully support evidence in chief submitted by CCC especially Dr Tim Chambers – Nitrate limit of 1Mg/l

Submission

1. I strongly oppose the parts of the plan that allow for significantly increased nitrate levels in the Christchurch Ground water supply. Any increase from the current average of 0.6mg/l is not acceptable and is illegal.
2. My reasons for opposing this plan are outlined below.
3. As a starting point ECAN needs to consult with Christchurch ratepayers on the preparation of this plan. The planning process should be completely reset. There has been a complete lack of the consultation with Christchurch ratepayers who are going to be most affected.

Plan Process

The planning processing to date have been significantly flawed and there has been no engagement with Christchurch City ratepayers who as a result of this plan will have their pristine drinking water destroyed by what we now know to be as cancer causing nitrates.

The Collaborative planning process that ECAN has followed does not meet any of the required MBIE guidelines (<https://www.mfe.govt.nz/rma/rma-processes-and-how-get-involved/plan-making-public-and-councils/collaborative-planning>) for such a process i.e.:

1. **Representativeness and accountability:** Ratepayers from Christchurch City have not been represented fairly or reasonably in this process. Unelected, Councillors who are farmers and live in Pleasant Point should have had no role in the preparation of this plan on behalf of Christchurch City residents.
2. **Inclusiveness:** Outside of the Collaborators there has been no process for Christchurch Residents to have input into the plan. In fact ECAN has deliberately gone out of its way to make sure they are excluded from the planning process with publicly excluded meetings between Zone Committees as an example.
3. **Deliberativeness:** This planned has clearly been developed by Farmers and Irrigators for continued farming. Where is the evidence that *“views are exchanged, arguments are critically examined, and shared knowledge is built up in a context of civility, respect and trust”* between Waimakariri and Christchurch City residents?
4. **Impartiality:** All parties have not been treated equally. Very clearly the opposite has occurred. A Zone Committee stacked with Irrigators and Farmers who represent less than 2% of the population have had an overwhelming input into the plan preparation. Christchurch City ratepayers have been completely excluded.
5. **Empowerment:** Nothing offered to Christchurch City residents
6. **Transparency:** There has been a complete lack of transparency with Christchurch City Residents.
7. **Lawfulness:** The RMA is very clear that polluting water is not allowed. Allowing ECAN to continually ignore this law needs to stop.

ECAN have already acknowledged that there are significant difference of opinion between Rural and Urban communities in relation to the water management in Canterbury. In putting together this plan they have taken an easy option and have gone out of their way to make sure Christchurch City residents were not involved in the outcome.

The Planning process should have been reset as soon as was identified that nitrates were flowing across the Waimakariri River

If Christchurch City residents had been represented properly, fairly and in proportion to the impact that this plan will have on them then there is no doubt that a completely different set of planning rules would have been proposed.

If this plan is agreed to then there will be no point in carrying out a planning process for the Canterbury West Melton Zone in 2022 as ultimately our nitrate levels will be determined by the ground water flowing into our aquifers. This is a completely unfair and unreasonable outcome.

The planning process needs to start again from scratch.

ECAN and the Planning Process in General

The plans developed by ECAN are in general overly complex (on purpose – so that they are unenforceable), have excessive and unacceptable timeframes and rely on tools that are completely unfit for purpose (Overseer – known to be 50% inaccurate). Why the Waimakariiri and OOTP plans are together just seems crazy.

We have been told that Science will fix the issues but ECANs own Scientists have made it clear that unless removing stock starts occurring there is not going to be any improvement in nitrate levels in ground water. If this is the case then clear targets on removing stock units need to be included in the plan. No more cows should be allowed in the Waimakariri zone until there is overwhelming evidence that water quality is improving.

Farm Environment Plans were all supposed to be completed by January 2017 but haven't been and in general ECAN does not achieve any environmental targets that it should be – refer the CWMS targets reports.

The RMA is very clear that Regional Councils are required to “maintain and improve water quality” ECAN continue to ignore this requirement and that needs to end with the implementation of this plan

In a 2018 survey by ECAN only 19% of the public thought this organisation was doing a good job in managing water. A truly pitiful score. In sending this plan out for consultation while allowing to pollute Christchurch Citys pristine water ECAN has lost all credibility.

I also strongly oppose any ratepayer money being spent on Managed Aquifer Schemes. These are just more Irrigation Schemes in disguise and there is no evidence of any benefits. If the water resource was being managed substantially and properly as it was supposed to be there would be no need to pump water into the ground.

Canterbury Water Management Strategy (CWMS)

The CWMS is now being acknowledged as the greatest man made environmental disaster in this provinces history. As such it should not be considered as part of this planning process – it has failed and needs to be dumped.

The implementation of Option D was always going to be the most risky option and this was further enhanced by elected representative being completely removed from the process. The unelected Leadership has completely failed and Canterbury's lakes, rivers and pristine ground water will most likely never recover.

Allowing mass dairy intensification to occur with little to no rules or regulations in place was extremely reckless and incompetent and to now expect everyone else to wait a generation for some resemblance of change to occur is just a very bad joke. Thankfully those involved will shortly be leaving and they should never again allowed to be part of anything to do with water management in Canterbury.

As part of this plan process the rules in the CWMS have largely been ignored. The First Order Priority in the CWMS is the Environment. This plan should have therefore been developed with environmental considerations being given preference over all other outcomes. However, this has not occurred with a Zone Committee over represented by Irrigators and Dairy Farmers developing a plan solely focused on allowing those activities to continue and grow.

While the CWMS makes it very clear that "all Stakeholders" on Zone Committees must be local this was not the case with Christchurch West Melton (CWM) committee. Not only are members of that committee not local but appointments to this committee are made by a majority of non-locals. Hence the CWM behaved disgracing by agreeing to meet in publicly excluded meetings with the Waimakariri Zone Committee and sign off on a ridiculous increase of allowed nitrates to 3.8mg/l. The recently agreed "Fit for Future" targets as part of the CWMS go even further with drinking water nitrate targets of 5.65mg/l.

Committee members who may be impacted financially by the outcome of this planning process have been allowed to continue their involvement and the Auditor General who only acted recently to remedy this issue has a lot to answer for.

The cost of the strategy was supposed to be funded by a Levy but somehow it's now a general rate with the majority of the funding being taken from Christchurch residents who are getting zero benefits (only increased cost). If this plan is implemented in any form then the rules should clearly state that funding will be on a polluter pays basis.

The CWMS has failed and should no longer be considered as part of any planning process.

Frank Hill