

# Comments

# LTP 2021-31

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**Submission Type** Web

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First name

Surname

**Email address** 

Are you submitting on behalf of an organisation? No, I'm submitting as an individual

Are you willing to tell us more about yourself? Yes

Which age category are you in? 40-64 years old

Which suburb or area do you live in?

Do you think we've prioritised the right issues and Yes opportunities?

see us progress with?

Which of the proposed options would you like to Option 1: statutory work, prior commitments and accelerating key initiatives

It is important that we hear what you would like to keep in the plan, what you think should be removed, and anything that you think we have missed?

Given continuing environmental deterioration, I would support greater and accelerated investment in ECan's Compliance, Monitoring and Enforcement function than indicated in Option 1. The organisation still needs far sharper teeth to enforce environmental compliance for polluting businesses, to balance the "carrot" approach.

Overall the public transport portfolio doesn't sit consistently with ECan's other responsibilities...should probably be moved to a separate dedicated agency over time.

Do you generally support the activities proposed in the following portfolios:

Water and Land Yes

Biodiversity and Biosecurity Yes

Climate Change and Community Resilience Yes

Air Quality, Transport and Urban Development Unsure

Regional and Strategic Leadership Yes

Do you have any further comments on the activities proposed in specific portfolio/s (please select all those you wish to comment on):

Water and Land

### Water and Land portfolio comments:

The recent example of the Lake Clearwater toxic algal bloom is the clearest evidence yet that ECan's compliance and enforcement capabilities are either underresourced or missing the correct data and evidential tools to prevent events like this before they happen. This should never ever happen again in Aotearoa New Zealand. How come farming businesses were able to fertilise so much of the land in this catchment? Was the data collected at the time? Is there a tool for an enforced moratorium on applying fertiliser in the catchment? What is being done now to retrospectively determine responsibility for damages caused and assign cleanup / compensation costs to the farming operations concerned? If it isn't ECan's responsibility to enforce this decisively then who?

The agricultural industry's continued negative environmental impacts need to be more forcibly rolled back at regional level and a cautionary principle applied on any new consents. Also a mechanism which applied a direct "Polluter Pays for the Cleanup" levy to fertiliser companies and farming businesses themselves should be considered in detail. Urban ratepayers are rightly aggrieved with the financial costs of enforcing compliance falling disproportionately on them rather than polluters themselves.

**Is the proposed increase in rates affordable for** Option 1 is affordable **your household?** 

Any further comments on affordability for your household?

None.

Is the proposed increase in rates affordable as a Yes whole for the Canterbury community?

### Any further comments on affordability for the community?

More targeted "Polluter pays" levies and fines should be considered to fund ECan's compliance activities.

**Do you support the changes we're proposing to**Don't know how we apply Uniform Annual General Charges?

#### Any further comments on Uniform Annual General Charges?

Feels that the UAGC principle is disproportionately unfair to small property owners. A fairer way would be to allocate per property valuation - eg a \$5M farm should pay a lot more than a \$350,000 1 bedroom apartment.

Would you support the use of borrowing for operating expenditure to offset some of the first year rates?

Yes

#### Any further comments on the use of borrowing for operating expenditure?

Borrow away, money is cheap right now and ECan needs to invest.

Do you support the rationale and proposed changes in the draft Fees and Charges Policy?

Don't know

Where do you live in Canterbury? Select your district below:

Christchurch city including Banks Peninsula

Would you like to see us investing in the following initiatives in your area? Kaikoura

Would you like to see us investing in the following initiatives in your area? Hurunui

Would you like to see us investing in the following initiatives in your area? Waimakariri

Would you like to see us investing in the following initiatives in your area? Christchurch

- On-demand public transport services
- Using aquifer recharge to manage freshwater quality
- Other initiative/s (please specify)

## Other initiative/s (please specify) Christchurch

Native reforestation
Pest control
More regional parks
Improving water quality of urban rivers and beaches

Would you like to see us investing in the following initiatives in your area? Selwyn

Would you like to see us investing in the following initiatives in your area? Ashburton

Would you like to see us investing in the following initiatives in your area? Mackenzie

Would you like to see us investing in the following initiatives in your area? Timaru

Would you like to see us investing in the following initiatives in your area? Waimate

Would you like to see us investing in the following initiatives in your area? Waitaki

Do you wish to speak to your submission? No

Would you like to be kept up-to-date with the outcome of this consultation?

No

How did you find out about giving feedback? . Social media (Facebook, Instagram, Twitter)

Your information is held and administered by Environment Canterbury in accordance with the Privacy Act 2020 and Environment Canterbury's Privacy Policy.

There is personal information/contact details in my submission I do not want disclosed:

Yes

Tell us which information you do not want disclosed:

Name, Email address