

## Comments

### LTP 2021-31

|                        |                 |
|------------------------|-----------------|
| <b>Comment ID</b>      | 377             |
| <b>Response Date</b>   | 5/04/21 7:06 AM |
| <b>Status</b>          | Processed       |
| <b>Submission Type</b> | Web             |
| <b>Version</b>         | 0.9             |
| <b>First name</b>      | Finley          |
| <b>Surname</b>         | Passmore        |

**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?** 15– 24 years old

**Which suburb or area do you live in?**

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

**Which of the proposed options would you like to see us progress with?** 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?**

The additional charge to swing moorings should not be implemented to cover salvage. Those who own swing moorings do so as they cannot afford a marina berth, or they are renting it for profit to somebody who cannot buy their own swing mooring. The mooring owners are responsible for ensuring that the moorings are compliant with Ecan's current inspection regime, and they already have to pay an annual fee to Ecan.

Considering that Ecan has the details of all mooring owners on file, dealing with abandoned or wrecked vessels should not be an issue: mooring owners should assume responsibility for vessels on their mooring. If the vessel owner and mooring owner are different people, the mooring owner should have to ensure the vessel owner's details and signature are obtained by Ecan acknowledging that they

accept all responsibility for the safety and salvage of their vessel on the mooring. If a vessel is found washed up or causing damage to other vessels, the associated mooring owner is contacted and legally liable for the damage, unless another person owns the vessel on that mooring, in which case Ecan should have their details on file (as said above).

It is stated that this fee will cover wrecked and abandoned vessels. It would only be fair for Ecan to release the statistics of how many vessels Ecan has paid to salvage over the last 10 years, what it has cost Ecan and whether this is increasing or not. It should then be stated how much this proposed fee is, as there are many swing moorings and it is hard to imagine that Ecan spends more than what it currently earns from Swing Mooring Authorisations on monitoring and salvage.

Ecan states that costs of wrecked vessels are recoverable from the owner if Ecan gets involved, so why do mooring owners need to pay out for costs that are recoverable from vessel owners all along? If a vessel owner cannot be found it simply shows that the harbourmaster's office is not doing a sound job of monitoring moorings and those who use them, which is what the annual fee is supposed to cover. This proposed fee is a quick way out of a problem which should be dealt with properly, by not allowing vessel owners to walk away from wrecked vessels and associated costs, which could be enforced with terms and conditions around swing mooring use and the harbourmaster's office keeping proper files on each mooring and the vessel using it.

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

|   |        |
|---|--------|
| <b>Water and Land</b>                               | No     |
| <b>Biodiversity and Biosecurity</b>                 | Unsure |
| <b>Climate Change and Community Resilience</b>      | Unsure |
| <b>Air Quality, Transport and Urban Development</b> | Unsure |
| <b>Regional and Strategic Leadership</b>            | Unsure |

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

|   |                              |
|---|------------------------------|
| <b>Is the proposed increase in rates affordable for your household?</b> | Neither option is affordable |
|---|------------------------------|

|  |            |
|--|------------|
| <b>Is the proposed increase in rates affordable as a whole for the Canterbury community?</b> | Don't know |
|--|------------|

|   |            |
|---|------------|
| <b>Do you support the changes we're proposing to how we apply Uniform Annual General Charges?</b> | Don't know |
|---|------------|

|   |            |
|---|------------|
| <b>Would you support the use of borrowing for operating expenditure to offset some of the first year rates?</b> | Don't know |
|---|------------|

|  |    |
|--|----|
| <b>Do you support the rationale and proposed changes in the draft Fees and Charges Policy?</b> | No |
|--|----|

**Any further comments on the Fees and Charges Policy?**

Additional fees for swing moorings to cover salvage is a poorly thought out solution to a problem which could be fixed by implementing mooring use terms and conditions and obtaining details of mooring and vessel owners, which the harbourmaster's office is supposed to be doing already.

**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**

**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:**

No