

## Comments

### LTP 2021-31

<b>Comment ID</b>	928
<b>Response Date</b>	11/04/21 2:59 PM
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>First name</b>	Kathryn
<b>Surname</b>	Bates
<b>Email address</b>	
<b>Are you submitting on behalf of an organisation?</b>	No, I'm submitting as an individual
<b>Are you willing to tell us more about yourself?</b>	Yes
<b>Which age category are you in?</b>	40-64 years old
<b>Which suburb or area do you live in?</b>	
<b>Do you think we've prioritised the right issues and opportunities?</b>	Yes
<b>Which of the proposed options would you like to see us progress with?</b>	Option 1: statutory work, prior commitments and accelerating key initiatives
<b>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?</b>	
Keep all of it (Option 1), but please make sure that the Te Mana o Te Wai regulations are easily implemented - will say more on this in Q12.	
<b>Do you generally support the activities proposed in the following portfolios:</b>	
<b>Water and Land</b>	Yes
<b>Biodiversity and Biosecurity</b>	Yes

<b>Climate Change and Community Resilience</b>	Yes
<b>Air Quality, Transport and Urban Development</b>	Yes
<b>Regional and Strategic Leadership</b>	Yes

<b>Do you have any further comments on the activities proposed in specific portfolio/s (please select all those you wish to comment on):</b>	. Water and Land
	. Biodiversity and Biosecurity
	. Climate Change and Community Resilience
	. Air Quality, Transport and Urban Development
	. Regional and Strategic Leadership

#### **Water and Land portfolio comments:**

Please make sure that the govt Te Mana o Te Wai regulations are easily implemented by landowners in the rural sector.

The focus for the NPS Freshwater and Canterbury Water Management Strategy (CWMS) has been primarily (and still is) on flat land <10 degrees slope, with very little action focussed on hill country. Hill country is the main contributor of sediment to waterways and it is extremely difficult to fence off to exclude stock. These hill slope land owners need to have different rules to flat land, and be given some sort of subsidy to comply, as their costs for fencing/stock exclusion are going to be phenomenally huge in comparison. There seems to be little to no reference made to this difference in land and compliance costs within the regulatory framework that I have seen so far.

Additionally, hill country farmers are still applying large amounts of fertiliser via top-dressing. No amount of GPS technology is going to protect the waterways in the vicinity from top-dressed application of fertiliser, directly from run-off or indirectly through drift. I would like to see more regulation around this and the requirement for hill country landowners/managers to apply for consent to apply fertiliser, with mandatory Farm Environment Plans and current nutrient budgets included. The Waikirikiri near Whitecliffs is just one river that this is affecting without anyone questioning why it is still having problems with algal blooms and what might be causing them.

This is another area where I have looked, but not found, any regulatory rules that landowners MUST comply with.

Please look into reducing rural conversions to dairy farming. Despite the relatively short-term economic gain to the region our soils and water on the Canterbury Plains cannot sustain such intensive farming practices. Our aquifers are very likely already beyond saving from nutrient runoff, despite best practice solutions of the last few years, and aquifer recharge cannot reverse the damage that has been done. Industrial-scale irrigation for industrial-scale dairy farming has, without a doubt, decreased even ephemeral water flows of our rivers and tributaries.

#### **Biodiversity and Biosecurity portfolio comments:**

Please make information on the importance of both of these to our NZ environment easily accessible and digestible for all cultures, ages and abilities. Make biodiversity an essential issue for rural landowners to understand.

#### **Climate Change and Community Resilience portfolio comments:**

Please make this a priority across all portfolios, making information easily accessible and digestible for all cultures, ages and abilities.

Engineer ways to help people to minimise their exposure to coastal hazards by increasing rates on coastal properties. Additionally, decrease the ability for coastal landowners to gain access to coastal hazard minimisation options to protect their properties as this has been proven to be an expensive and losing battle. Likewise for properties that have recently been developed and built on flood-prone areas near rivers.

Ultimately, eliminate future development of any coastal property between sea level and 10m, and future riparian development on historic flood plains and channels. Stop allowing consents for these and moving the decision-making onto future generations to deal with.



**Air Quality, Transport and Urban Development portfolio comments:**

Please stop ignoring the effects on air quality of stubble burn-off. Despite stubble fires being brief affairs on the ground, the air quality (detected through smell and visibility) across the mid-Canterbury Plains in the last year has been appalling for long periods. ECan says the main issue for PM10 is primarily from urban fires, but of course the data shows that if you are only monitoring urban areas. ECan appear to have absolutely no rural monitoring stations between Rangiora and Ashburton, which are relatively coastal and subject to convenient on-shore winds. It is imperative that inland monitoring stations are installed near Darfield, Rolleston, Lincoln, Kirwee, Hororata, Sheffield or Oxford. As a kid we used to burn annually on our hill farm, and despite being really fun, we stopped when we realised it was not really helping and just destroyed the natural balance of flora and fauna. And it is dangerous, and a concern for rural (usually volunteer) fire services.

Stubble fires have been banned in many countries around the world for various reasons, not the least of which is the contribution to the atmosphere of particulate matter and toxic greenhouse gases.

Alternatives, such as tilling the stubble back into the soil may be more time- and money-consuming, but the short-term (better air quality) and long-term (climate change, soil health) benefits are greater. The farmers' reasoning that it kills pests and diseases carries no weight when viewed in the light of the benefits that more-sustainable practices such as regenerative farming bring to the land. We are all having to stop doing things the way we have always done it for the sake of our planet. ECan's light-handed approach to such a visible air pollutant is no longer acceptable and unless ECan or rural large landowners have data to refute my concerns then I won't stop harping on about it.

**Regional and Strategic Leadership portfolio comments:**

I think you have outlined this well, just stick to those principles!

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

**Any further comments on affordability for your household?**

If it makes for a good place to live, then we are all for it.

**Is the proposed increase in rates affordable as a whole for the Canterbury community?** Don't know

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

Please place the majority of cost-bearing responsibility onto polluters, consent non-compliers, high water users.

**Do you support the changes we're proposing to how we apply Uniform Annual General Charges?** Yes

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

Higher charges for polluting industry and businesses. Charge large water users for their water.

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

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

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

Maintain and fight for a democratically elected council and I won't complain!

**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**

Other initiative/s (please specify)

**Other initiative/s (please specify) Christchurch**

Reduce road-cutting erosion on Banks Peninsula, especially into Lyttelton Harbour  
Increase reticulated water supply network to rural areas to reduce water take from local springs/streams (and maintain rural subdivision rules as they are)  
Install permanent rural air quality monitoring stations in inland Canterbury and help rural landowners to understand that there are better alternatives - give them some initial incentives to get this information across.  
Investigate a commuter rail network to satellite towns already on a rail line such as Darfield, Rolleston, Rakaia, Ashburton, Waipara, Amberley, Kaiapoi, Rangiora to reduce road traffic. Make rural Canterbury an accessible and great place to live!

**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**

**if you would like to give feedback via video, add a link to a downloadable YouTube clip or Dropbox file below**

<https://www.youtube.com/watch?v=11209Wheabg> <https://www.dropbox.com/s/11209Wheabg/11209Wheabg.mp4?dl=1>

**Do you wish to speak to your submission?** Yes

*We may use your phone number to contact you to arrange attendance at a hearing. This information will be kept private.*

**Phone number**

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

**How did you find out about giving feedback?**

- . Social media (Facebook, Instagram, Twitter)
- . Environment Canterbury website
- . Word of mouth
- . Newspaper
- . Meeting, hui or event
- . Email

*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