

## Comments

### LTP 2021-31

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| Surname         | Brooks           |
| Email address   |                  |

**Are you submitting on behalf of an organisation?** Yes, I'm submitting on behalf of an organisation

**Which organisation are you submitting on behalf of?** Mhv water limited

**Do you think we've prioritised the right issues and opportunities?** No

#### **What do you feel are the significant challenges and opportunities we face?**

There are significant regulatory headwinds facing all regional councils. Environment Canterbury has invested significantly in sub regional plans to give effect to NPS FM17 and we strongly recommend further work is done to ascertain the ability to push back the 2024 notification requirements where subregional plans are already in place and already on a pathway to achieving the new NPS FM 20 targets. Prioritising rework that will be expensive and add very little value in terms of improving environmental outcomes is strongly opposed by MHV Water

**Which of the proposed options would you like to see us progress with?** Other option (please specify)

We do not support either option and believe ECan have sufficiently investigated the extent of need for the statutory requirements and as such the costs could be reduced. We believe there are also considerable other costs which could be controlled as opposed to just looking to increase revenue (rates).

We support the targeted regional rate for Managed Aquifer Recharge.

**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?**

As above. The huge costs with statutory work could be reduced and I believe some of the education work streams, whilst 'nice to have', may be outside the scope of the Regional Council

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

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

Please see above re rework

**Is the proposed increase in rates affordable for your household?** Neither option is affordable

**Is the proposed increase in rates affordable as a whole for the Canterbury community?** No

**Do you support the changes we're proposing to how we apply Uniform Annual General Charges?** No

**Would you support the use of borrowing for operating expenditure to offset some of the first year rates?** No

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

Borrowing to cover excessive spending on operational activities is highly concerning and we do not support that. We would support borrowing for capital expenditure on fixed assets.

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

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

**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**

**The Hekeao Hinds Managed Aquifer Recharge is a pilot of environmental infrastructure to address water quality. To continue enhancing this infrastructure, the project would require ongoing targeted rates from the Ashburton district. Find out more [link]. Do you want to see this project continue?** Yes

**Any further comments on Hekeao Hinds Managed Aquifer Recharge? Yes**

This project is critical for the community and if it proceeds it should be decided by the community it serves.

**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?** 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?** . Word of mouth

. Meeting, hui or event

*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