

Comments

LTP 2021-31

Comment ID	1087
Response Date	12/04/21 9:27 AM
Status	Submitted
Submission Type	Web
Version	0.1
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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? Papanui Baptist Church Earthcare Group

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?

See attached submission. Our main concern is the lack of specific examples, programmes, investigations etc, with the result that it will be very difficult to determine subsequent changes (whether positive or negative)

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:

See attached submission

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

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

Using aquifer recharge to manage freshwater quality

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? Yes

How did you find out about giving feedback? Environment Canterbury website

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

Submission on Environment Canterbury Draft Long-Term Plan 2021–31 Te Pae Tawhiti 2021–31

Submitter: Earthcare Group , Papanui Baptist Church

Please note that these comments are provided by a group from within Papanui Baptist Church, and do not necessarily reflect the views of the whole church

Who we are: We are a group of Christians who are very concerned about the present state of our planet. We are a small and relatively new group, but already involved in implementing changes in how our church functions (“zero waste” target etc), involvement in local projects (tree planting), and making representation at both regional and national levels.

Environment Canterbury (ECan) responsibilities:

To quote from the plan: “The work of Environment Canterbury is structured into five portfolios:

- Water and Land/Te Wai me Te Whenua
- Biodiversity and Biosecurity/Te Rerenga Rauropi me Te Whakahaumarau Rauropi
- Climate Change and Community Resilience/Te Whakamahanatanga o Te Ao me Te Aumangea o te Hapori
- Air Quality, Transport and Urban Development/Te Pai o Te Hau Takiwā, Ngā Momo Waka, me Te Whanaketanga o Ngā Tāone
- Regional and Strategic Leadership/Te Hautūtanga ā-Rohe, ā-Rautaki hoki

Each portfolio is described in the following pages and includes an overview of the work proposed, why we're doing it and what success looks like. Each portfolio is made up of programmes that include specific activities, Levels of Service, performance measures and targets. We will report against these quarterly and in our Annual Report”.

Our response to The Draft long-term Plan:

The overall plan covers all the responsibilities and work of ECan – the plan is beautifully produced, well-illustrated with helpful figures and tables. But as a plan it is particularly short of specific information and examples. While we appreciate it is a “high level” document, surely a plan should have specific information about aims, projects, and threats. The goals presented are usually about the number of meetings to be held, the number of events to be sponsored etc – such measures are peripheral to the main issues. It is hard to be enthusiastic about such a high- level document that contains very few environmental measures that might be used to determine success. We see this lack of environmental and social accountability as a major shortcoming.

Over ¾ of the report is to do with finances – important but that balance understates the importance of the environmental issues. If a person just read the plan without any knowledge on the state of the environment, they would probably conclude that all is well. Unfortunately, this is far from true.

Using Water and Land/Te Wai me Te Whenua as an example:

- Where do Maori values of rangatiratanga etc come in? Such values provide opportunities for more holistic and interdependent views of resources rather than the typical European compartmentalising approach
- Water quality – nitrate levels in groundwaters are high (although generally below the present New Zealand Drinking Water Standards of 11.3 mg/l nitrate-nitrogen which is high

by international standards), increasing, and will do so for at least 20 years or more. Where are the plans to reduce these levels? How safe is the Christchurch aquifer given that most recharge takes place from the Waimakariri River?

- What controls are there for not allowing dairy conversions on thin and vulnerable soils (like the area between Twizel and Omarama)?
- What controls are there on the overuse of synthetic nitrates?
- The Ashburton Lakes have always been regarded as special and examples of “pristine” high country ecosystems, yet they are all showing signs of increasing eutrophication, especially Lake Clearwater. What plans are in place to remedy this?
- Given the acknowledged over- abstraction of many surface waters, and the loss of important recreational rivers like the Hinds and Selwyn, what plans are in place to set suitable minimum flows/flow regimes that will ensure biodiversity and recreational use have priority over agricultural and industrial use?
- How will gravel extraction be managed to ensure there is no gravel starvation and erosion of coastal environments, and protection of the unique properties of braided rivers?
- No wetlands are mentioned by name
- Flood control – surely protection of Christchurch (the main centre of population, transport and commerce) is the highest priority?

The SMART acronym (Specific, Measurable, Achievable, Relevant and Time-based) seems relevant. While the plan states “The Long-Term Plan (LTP) sets out our strategic vision, commitment and accountability to the community. It outlines what we are proposing to do over the next 10 years, how much it would cost and how it would be funded. It also describes the outcomes sought for the “community” there is little that is measurable (other than numbers of meetings, carry out audits, develop programmes etc). No doubt there are tiers of plans below the LTP, but given the sensitivity to issues like the quality of Christchurch drinking water (recall the uproar when chlorination was necessary post-earthquake), the LTP does little to reassure the reader that such issues are being adequately addressed. This is not to say that ECan is unconcerned about such issues but surely a 10-year plan is an opportunity to highlight and reinforce some of the actual priorities and activities. Readers would be more reassured to know there are processes like Farm Environment Plans to help manage nitrogen leaching, required stock fencing etc. We feel that the report does itself a disservice by omitting such examples.

We do not doubt the sincerity of councillors and staff of Ecan in addressing complex and sensitive environmental issues. Our planet is facing the uncertain outcomes of climate change and loss of biodiversity – people need the reassurance of plans and commitments to act boldly and decisively on such things. Because of the lack of specific examples and opportunities, the 10 year plan does little to allay such concerns.