

Comments

LTP 2021-31

Comment ID	1230
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Surname	Dunn
Email address	
Are you submitting on behalf of an organisation?	No, I'm submitting as an individual
Which age category are you in?	-
Do you have any further comments on the activities proposed in specific portfolio/s (please select all those you wish to comment on):	
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	

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? Yes

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

Phone number

How did you find out about giving feedback?

From:
To:
Subject: Submission on Ecan's Long Term Plan
Date: Sunday, 11 April 2021 11:29:33 am
Attachments: [Ecan LTP 2021.docx](#)

Please find attached my submission on the LTP.

Regards,
Kevin Dunn

Submission on Environment Canterbury Long Term Plan 2021-2031

Submitter: Kevin Dunn

Address:

Date: 10 April 2021

By Email:

We **support** increased expenditure on:

Climate Change

- a. Climate change mitigation: coastal erosion, removal of historic landfills and toxic contaminants adjacent to surface water bodies or above shallow aquifers and sediment control from future flooding events.
- b. Increasing protection of wetlands, both for biodiversity enhancement and carbon absorption.

Water Quality and Allocation

- a. Align regional and sub-regional plans with the Government's proposed Essential Freshwater Reforms 2024.
- b. Stronger regulation and enforcement to improve water quality and meet climate change targets by reducing dairy cow numbers, disallowing any new dairy conversions, limiting use of synthetic fertilizer and chemicals and preventing any new water extraction from over-allocated catchments.
- c. Improve water quality to a drinking water standard. High nitrate levels are putting public health at risk. There is an urgent need to reduce nitrogen limit in freshwater to a maximum of 1mg NO₃-N/L. The long term public health cost of not doing so will far exceed the cost of reducing nitrate pollution.
- d. Protection of source water in pristine alpine rivers, lakes, and wetlands from land use intensification. There is an urgent need to take decisive action on deteriorating water quality in high country lakes and rivers.

Land

- a. Stronger regulation to protect and enhance existing indigenous biodiversity.
- b. Funding to support planting of natives in permanent plantations, instead of pine forests, for carbon sequestration and enhancing biodiversity.
- c. Continued removal of wilding trees and weeds, including lupins.
- d. Increased control of pests including wallaby, hares, rabbits and feral cats. All are very destructive to our native habitat.

Compliance

- a. Increased focus on monitoring, enforcement and prosecution for non-compliance.
- b. The departments associated with monitoring, compliance and prosecution should have increased resources.
- c. Monitoring, enforcement and prosecution costs should be at least partially funded from prosecution fines.

Public Participation and Transparency

- a. Ecan has to significantly improve transparency and its decision making processes around its activities to regain lost ratepayer support. Since the imposition of Commissioners, Ecan has had a “development” focus with environment and biodiversity completely disregarded. We are now in our second term of elected councilors and there is still very little change evident. The culture within the executive team has to change.
There have been too many poor decisions, lack of consistency and deliberate actions taken contrary to the regulatory framework within which Ecan operates. This is still evident in the current draft regional plan, in the portrayal of MAR as a “solution” to Canterbury’s water issues. This is a gross distortion of reality.
- b. Full public participation in the development of short term and long term plans.
- c. Discontinue issuing non-notified resource consents to applications that affect have **any** effect on environment and public health.
- d. The public should be able to participate in RC applications that do not meet freshwater targets (eg MVH Ltd, Barrhill Chertsey and Ashburton Lyndhurst irrigation schemes).

We **oppose** expenditure for:

- Investment in Managed Aquifer Recharge (MAR) projects to manage freshwater quality are **STRONGLY OPPOSED**.
There is a belief that MAR can provide communities with clean water to resolve nitrate issues. The process of pumping clean water into the aquifer around the well takeoff simply dilutes the pollution. It does not address the underlying cause of the contamination. It does not reduce the contaminants entering the aquifers, rivers and streams. It does not increase the quantity of water, other than by taking supply from another source (eg rivers). It does not improve eco-system health and only provides marginal benefit to those communities in which it operates. Further, there is no benefit to the thousands of people in

Canterbury that have their own wells for potable water. It is at best a weak band aid to achieve political credibility. MAR only conceals the true state of our aquifers and is not a substitute for a strong regulatory framework to manage and control runoff from chemicals, fertiliser, and animal effluent.

- The Uniform Annual Charge (UAC). This flat charge is unfair, should be deleted, and costs of the activities (Civil Defence etc) included in the general rate.
- Discharges of contaminants directly to water bodies. This should be managed by monitoring and enforcement action.
- Further funding for Zone committees. The wider community has lost trust in the zone committees as a result of poor decision making and bias associated with vested interests within the committees. They are seen as puppets of Ecan, and not independent in any way. It is time they were disbanded.
- Increasing debt to provide for funding shortfalls. This is not considered to be a responsible option in the interests of future generations. The benefits may accrue now, but the real costs are carried into the future.

I wish to be heard in support of this submission.