

From: Environment Canterbury
Sent: Tuesday, 22 March 2022 8:59 pm
To: Have your Say
Subject: Submission on draft Annual Plan 2022/23

Anonymous User just submitted 'Draft Annual Plan 2022/23 submission' with the responses below.

First name

Petersc

Last name

Weir

Email address

Suburb

Sumner, Christchurch

Phone number

Are you submitting on behalf of an organisation?

No, I'm submitting as an individual

Which age category are you in?

40-64 years old

Do you wish to speak to your submission at a Council hearing?

Yes

Which bus fare structure option would you like to see trialled?

Option 1 (preferred): Fare-free for under 25s, students, Total Mobility and Community Services card holders

Tell us more about why you support the selected bus fare option.

ECan's current public passenger transport model is not working in Christchurch; its should serve as an embarrassment to elected Councillors and to staff. The Sumner bus often runs empty, but the proposed model will only save GHG emissions if ECan requires its service providers to switch to electric buses on the flat and hybrid buses with fully regenerative hybrid buses on the hill suburbs.

Is borrowing and repaying through general rates the right approach for this regionally significant event?

No

How else might we pay for our share of this work?

The former Catchment Board rating district funding model worked. As an owner of farmland in the Staveley district of Ashburton, but sitting on a high terrace well above Taylors stream, I believe it would be grossly unfair to pay rates to protect those landowners who have purchased and developed known high flood risk land downstream in the Greenstreet area that sits between the North and South Branches of the Ashburton River. Those land owners should not expect to profit by socialising their losses after making conscious business decisions to undertake intensive farming on known highly vulnerable land, or failing to undertake due diligence, including checking ECan flood hazard on line mapping before developing that land. As an Ashburton rural ratepayer, I strongly support Option 2 Status quo – keep the current distribution of rates in the Ashburton River/Hakatere rating district.

How do you think recovery from flooding of this scale – events that impact state highways, bridges, rail and power for example – should be funded in the future?

ECan's focus should not be on "recovery" - private land owners can insure for flood recovery or if insurance becomes prohibitively expensive or unavailable the market will factor it into the value of that land. Rather ECan's focus should be on proactive flood "protection" via bio-engineering and Civil engineering (maintenance of existing stop banks and river groyne structures as exist on the Waimakariri river west of Christchurch) in the manner that the former catchment boards did. ECan staff are either out of touch or ill-informed or both if they truly believe the assertion on page 19 that " This was a 'one-off' nature of this event ". The areas subject to recent inundation in Ashburton District were well known to the former South Canterbury Catchment Board, and the reality is that there is always a larger flood coming, and with climate change such floods will become more frequent. The wording of Q14 above further indicates that ECan planners are ill-informed if they have advised Councillors that ECan needs to fund "reinstatement of state highway or rail bridges nor power lines" as implied. Instead Ecan needs to do a much better job of keeping the flood fairways of Canterbury's braided river beds free of invasive weeds , including removal of willows and poplars (via herbicide application) and associated predator control (via aerial application of vertebrate toxins). Councillors should look to the north side of the Rakaia River at SH1 as an example of where several cells of the bridge have become blocked by willows. Elected Councillors should direct ECan Zone Committee Chairs and members to ensure that engineering staff can ensure that the river and stream banks are destocked and well fenced, and that live riparian plantings interfaced with anchored bank protection (using coppicing willows, not natives) and other bioengineering works are maintained. That will extend to empowering ECan's Compliance Monitoring & Enforcement officers to enforce stock exclusion regulations to improve flood protection.

Which option for distribution of rates in Ashburton River rating district do you support?

Option 2 (status quo): Keep the current distribution of rates in the Ashburton River rating district.

Any other comments on flood protection in Ashburton?

The areas subject to periodic inundation by flood waters in Ashburton District were well known to the former South Canterbury Catchment Board. After graduation from University I worked in the Ashburton sub-office of the river engineering section of that Catchment Board and I recall seeing old blueprint plans for a constructed cut to redirect the North Branch into the South Branch through the Greenstreet / Ashburton forks area to reduce the flood risk to Ashburton town from a break out at Blands corner above Digbys Bridge. Back in the 1980s I was part of a resurvey team charged with quantifying the build up of river gravel in the North Branch. That Flood hazard is well described in an ECan commissioned report by McPherson in 1997 "Aerial Photographic Geomorphic Interpretation of the Ashburton River Floodplain" Refer CRC Y97/2 . I recommend that report to Councillors for its excellent analysis.
<https://api.ecan.govt.nz/TrimPublicAPI/documents/download/301398>

Would you support a levy to accelerate action in response to climate change?

No

Any other comments on future funding for responding to climate change?

Since 2008 New Zealand has an "All sectors - All gases" emissions trading scheme (ETS) which is our nation's primary policy response to climate change, but there two notable gaps (other than omission of the pastoral agriculture which may shortly be addressed by the He Waka Eke Noa initiative - HWEN), where ECan could use policies and methods (Rules) in its Air Plan to introduce a new levy to fund a regional response to climate change. The NZ ETS does not cover International Aviation and Ocean Freight, meaning that the greenhouse gas emissions from those two transport sectors go unpriced. Those transport sectors are "fair game" for ECan policy makers. A levy, indexed to the prevailing price of carbon emissions in the NZ ETS (NZ \$74/tonne of CO₂e at the time of writing) on container boats not plugged into shore power to run their on board refrigeration and on cruise boats not plugged into shore power, hence running on board generators at both the Ports of Lyttleton and Timaru and on cruise boats moored overnight in Akaroa Harbour could raise significant revenue while improving air quality (hence using the Air Plan as a policy lever) while reducing green house gas emissions. A precedent for this has been set with differential mooring charges and rebates at Rotterdam and other European ports. Refer <https://www.qcintel.com/article/rotterdam-port-unveils-tech-to-estimate-ship-co2-emissions-4013.html> or <http://www.ppmc-transport.org/port-vision-for-2030-the-port-of-rotterdams-climate-initiative/> If ECan wished to go further it could use its Transport Plan to levy heavy container trucks passing through the gates port at Lyttleton or using the Lyttleton road tunnel and introduce a cross subsidy to encourage containers on rail from freight forwarding hubs at say Timaru, Ashburton, Rangiora and Amberly in addition to the existing container hub at Rolleston. That levy charge could be hypothecated to electrify the rail from those container hubs. A fuel levy on International air travel and cargo, indexed to the prevailing price of carbon emissions in the NZ ETS could be applied to Jet fuel taken on board at Christchurch International Airport. Again this could be framed as a pollution levy under the Air Plan. Any other measures would represent double dipping, assuming of course that pastoral farming (representing just under half of NZs total GHG emissions) either joins the NZ ETS or faces a price incentive to reduce emissions via HWEN.

Where did you hear about the consultation?

News article
Environment Canterbury website
