

TRIM Ref: 22032304307

23 March 2022

The Chief Executive  
Environmental Canterbury

E-mail:

Dear Madam

**SUBMISSION ON ENVIRONMENTAL CANTERBURY'S DRAFT 2022/22 ANNUAL PLAN**

The Oxford-Ohoka Community Board (the Board) respectfully requests to be heard regarding this submission.

The Oxford-Ohoka Community Board (the Board) thank you for the opportunity to comment on the Draft Annual Plan 2022/23. However, the Board would like to raise its concern regarding the lack of detailed information in the Environment Canterbury (ECan) Consultation Document and Annual Plan.

The Board supports the Waimakariri District Council's submission on ECan's draft Annual Plan 2022/23. The Board would, however, like to raise the following concerns:

**(a) The Proposed increase in average rates**

The Board is very concerned about the unrealistic high increase in ECan proposed rates. The Board feels that the 24.1 % increase in rates is far too high for the average Waimakariri household to absorb at any one time. The extra cost will add to the financial burden of families and add to the stress and mental health issues in communities. The Board cannot see how the significant increase could be justifiable, particularly given the financial burdens brought on by Covid-19 in already vulnerable communities. The Board, therefore, requests that ECan reassesses and consider taking on debt for a more extended period and borrowing rather than expecting ratepayers to pay for everything.

**(b) Change in the bus fee structure**

The rates per (urban) property cost of the commuter service in Waimakariri is 12% more than that service in Selwyn District and 15% less than for a comparable property in Christchurch City. However, the latter enjoys a metro level of service. It is the Board's opinion that the free bus services will not be free, as the cost will be borne by ratepayers, many of whom, in the Boards area, do not have access to a bus service. The Board also do not believe that the targeted fare-free will contribute to eliminating transport greenhouse gas emissions, as the concessions are restricted to those groups most likely already use public transport. The Board would therefore not support any further ratepayer subsidisation of public transportation.

**(c) Flood recovery and protection**

The Board acknowledges the need for flood protection work. However, there is very little information in ECan's draft Annual Plan 2022/23 to justify the proposed cost-share arrangement, and without additional information, the Board cannot support the proposal.

**(d) Future funding for action in response to climate change**

The Board shares ECan's concern about climate change and agrees that we should be ready for future climate events. However, ECan's proposal seeks support for a levy for future funding without specifying any details on initiatives and/or work programmes to be implemented, and without additional information, the Board cannot support the proposal.

Thank you once again for the opportunity to comment.

Regards

Doug Nicholl  
Chairperson  
Oxford-Ohoka Community Board

Contact:                                      Thea Kunkel, Governance Team Leader  
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