Response ID	5652307
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Are you submitting on behalf of an organisation, association or community group?	No, it's my personal submission
Name of organisation, association or community group	

Supporting your submission

Anyone can make a submission. All submissions will be considered by Council in accordance with our submissions policy before they make a decision.

You can upload documents to support your submission. Please make sure each page includes your name. The maximum file size is 200MB	https://s3-ap-southeast-2.amazonaws.com/ehq-production- australia/5799951ad743c51660a0954ee2395ff81686bdfd/original/17 13153171/0cbc2e1bb9295fa9093811413be900f6_The_Greenstreet_C reek_and_Environment_Canterbury.docx?1713153171 See Upload File 1 section.
You can upload documents to support your submission. Please make sure each page includes your name. The maximum file size is 200MB	See Upload File 2 section.
If you would like to give feedback via a video, add a link to YouTube or Dropbox file below	See Upload File 3 section.
If you wish, you can also come to talk to Council about your submission at public sessions that are known as 'hearings'. Do you want to speak to Council about your submission at the Long-Term Plan hearings?	No
Please provide your phone number so we can contact you to schedule a hearing time	
Which age category are you in?	

Environmental Regulation and Protection

We are Canterbury's environmental regulator. We are responsible for managing natural resources including air, soil, water and land. We work with mana whenua, stakeholders, and communities to promote the sustainable management of these natural resources, and protect and enhance the health of our natural environment.

Question	Answer
We are proposing three options for funding our Environmental Regulation and Protection services. Please indicate which option you prefer	
Tell us more about the option you chose. What would you support and what would you suggest we change or do differently for Environmental Regulation and Protection?	

Targeted rate for Christchurch district biodiversity

We are proposing to fund more work to improve indigenous biodiversity outcomes in Christchurch and Banks Peninsula through a new targeted rate to properties in those areas.

This would be in addition to the work already funded through the existing regional rate. \$1million for this additional work is already included in Council's preferred option for Environmental Regulation and Protection services.

This equates to rates of 72 cents per year per \$100,000 of your property value.

If there is sufficient support for this new targeted rate, Council could decide to include this targeted rate regardless of whether Option 2 is ultimately accepted.

Question	Answer
Do you support this new biodiversity targeted rate?	
Tell us more about why you support / don't support this biodiversity rate?	

Community Preparedness and Response to Hazards

We support the community to be prepared for, and be able to respond to hazards, and to be prepared for changes in the natural environment.

Question	Answer
We are proposing three options for funding our Community Preparedness and Response to Hazards services. Please indicate which option you prefer	
Tell us more about the option you chose. What would you support and what would you suggest we change or do differently for Community Preparedness and Response to Hazards?	

Targeted rate for Selwyn district for river resilience

We are proposing a trial in the Selwyn district to carry out additional flood and river resilience activities. Existing schemes do not change.

The cost for this additional work will be through a targeted rate to all properties in the Selwyn district. \$200,000 for this additional work is already included in Council's preferred option for Community Preparedness and Response to Hazards. This equates to rates of \$7.08 per rate-paying property in Selwyn district in 2024/25 (Year 1).

Question	Answer
Do you support a new river targeted rate in Selwyn?	
Tell us more about why you support / don't support this river rate	

Public Transport

We provide urban bus services within the Canterbury region, and ferry services in Christchurch.

We do this because public transport increases accessibility, connects communities and contributes to significant environmental benefits such as reduced greenhouse gas emissions, better air quality, and improved travel times across the transport network.

Question	Answer
We are proposing three options to fund Public Transport services. Please indicate which option you prefer	
Tell us more about the option you chose. What would you support and what would you suggest we change or do differently for Public Transport?	

Fees and Charges schedule

In order to make our consent-related costs more transparent, we are proposing a move towards a fixed-fee approach for some of our consenting work.

There are a number of benefits to this for our community including certainty of invoice amount, more timely invoicing, removing the need for a deposit and standard site visit costs will be built in.

Question	Answer
Do you agree with this new fees and charges proposal?	
Tell us more about why you support / don't support this approach. What would you support and what would you suggest we change or do differently?	

Uniform Annual General Charge / Uniform Annual Charge (UAGC/UAC)

UAGC/UAC are flat charges that are applied at the same amount for every property, no matter the value of your property. We currently charge ratepayers \$54.49 (in the 2023/24 year) for a range of services funded by UAGC or targeted UAC. This income represents approximately 8% of the total amount of money we collect from rates.

Council's preferred option is to set the UAGC and UAC charges to approximately 8% of total rates each year of the Long-Term Plan. This means as rates rise in the future, the value of the UAGC/UAC component of rates will also rise.

Question	Answer
Which Uniform Annual General Charge/Uniform Annual Charge	

(UAGC/UAC) rate increase would you support?	
Tell us more about the option you chose. What would you suggest we change or do differently?	

Strategies and policies

Question	Answer
We'd value your feedback on any of these strategies and policies	
Tell us what you think about the Financial Strategy	
Tell us what you think about the Revenue and Financing Policy	
Tell us what you think about the 30-Year Infrastructure Strategy 2024-54	
Tell us what you think about the Engagement, Significance and Māori Participation Policy	

Upload File 1.

You can upload documents to support your submission. Please make sure each page includes your name. The maximum file size is 200MB. If Image uploaded, will be shown below, if document it will be saved separately to this PDF.



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The Greenstreet Creek and Environment Canterbury; What's the Cost?

A letter in support of a long-term plan submission. By Friends of the Greenstreet Creek.

April 2024.

Introduction.

Greenstreet is an area that lies between the south and north branches of the Hakatere Ashburton River extending almost to the confluence of the two rivers. It is an area of outstanding natural beauty, agricultural diversity and strong community. It is of importance to Ashburton and to Canterbury in terms of agricultural production and employment.

Recently the Greenstreet Creek (the Creek) was reduced to very low flow rates for some months compared to previous dry years, and in March 2024 it ran dry. Some say this creek had not run dry for over forty years.

The Greenstreet Creek is a 10km long well-established freshwater ecosystem which is springfed and because it is vulnerable to low flow rates in dry summers can be supplemented periodically in dry months with water used for irrigation and with water from other creeks. Such supplementation has very little, if any, negative impact on other waterways or irrigation systems, but has kept Creek water flow rates at levels that can safely sustain aquatic

systems, but has kept Creek water flow rates at levels that can safely sustain aquatic freshwater life in the Creek. The Creek acts as a refuge for native and exotic aquatic animals when the North Ashburton River is dry.

Environment Canterbury (ECan) is the regulator charged with the protection and control of our terrestrial and aquatic environments. Taking action together to shape a thriving and resilient Canterbury now and for future generations. Advocating for the protection of native fish species including uninterrupted access to the sea and the reduction of fish barriers where appropriate.

Submission.

The Greenstreet Community, which comprises residents, small block holders, businesses and farmers, wishes to make a written submission (thoughts proposals and recommendations) to Environment Canterbury in response to

- The Creek becoming dry
- The (lack of) appropriate action to restore the Creek.
- The lack of willingness to work alongside the Greenstreet Community.

This submission is also a response to the request for feedback on the Long-Term Plan. Which essentially only relates to ONE year of spending not ten years. Our commitment is to ten years and beyond for our aquatic environment in Greenstreet.

We seek sustainable, practical solutions to always keep water flowing in ALL waterways, to continue to irrigate without unnecessary drain on ground water and to learn more about the intricate and complex nature of the Creek systems.

Why do we make this submission?

The significance of this submission to Environment Canterbury is that we have an inherent obligation as land custodians to do all we can to preserve our native and exotic animals which depend on creeks for their natural biology. We do this for our children and their children. We do it for wider our land, our air and our water.

Te Whenua. Te Hau. Te Wai.

Preserving aquatic life maintains a balance in fresh waterways. This balance allows for successful reproduction and propagation of the species. Anything that disrupts this balance will negatively impact on population dynamics, reduce numbers of animals, and potentially allow increasing populations of predators, pests and diseases to emerge.

As custodians of our air, land and water we demonstrate values that we consider are in the best interests of the Canterbury Environment. We

- Collaborate with each other regularly to discuss the Creek
- Protect the Creek from environmental harm
- Maintain the water quality to the best of our ability
- Ensure water continually flows at a level that will allow aquatic life to survive and thrive
- Enhance the Creek environment by planting suitable species along the banks
- Recognize that the Canterbury Environment does need a regulatory body to ensure our ecosystems are preserved
- Agree that this requires funding to be used in a fair and effective way
- Think that Environment Canterbury could act better for the best interests of the Greenstreet Creek, and could have a better appreciation of the Greenstreet waterway system.

Background.

Notwithstanding the fact that the summer of 2024 saw greatly reduced rainfall, the Creek has not run dry for many (some locals say forty) years.



Fig 1. The Greenstreet Creek

Fig 2. The dry Creek

This has been, in large part, due to farmers diverting some (a very small amount) of their irrigation quota very occasionally into the Creek in order to keep it flowing. This act of kindness by farmers has little or no effect on other waterways, such as the North Branch of the Ashburton River which often runs dry, but has a major effect on maintaining the Creek ecosystem.

Why was there no plan to prevent the Creek water level becoming so low?

Animal Rescue.

During the time the Creek was running dangerously low, Fish and Game NZ responded immediately to a request to help rescue dying aquatic animals. What ensued was truly enlightening. Hundreds of fish such as **trout**, **perch**, **eels** (**tuna**), **bullies**, **crayfish** (**koura**) and **native whitebait** (**Inanga**) were rescued from one pool and relocated to safety.

These animals were at various life stages (koura in berry) indicative of the fact that the Creek is a very well-established breeding waterway and a sanctuary from the dry river bed. In fact, the Creek, which is 10km long, is Greenstreet's most established and largest natural ecosystem. An ecosystem closely integrated with the wider natural environments of birds, insects, mammals and trees.

Why was a contingency plan not in place between ECan and others to rescue aquatic life in an emergency should it be necessary?

Consent Review.

In 2023 Environment Canterbury changed the water consent rules as part of a review designed to preserve water flow rates in O'Shea Creek which in turn should preserve the (North) Ashburton River and its ecosystem. This meant farmers were prohibited from diverting irrigation water to supplement the Greenstreet Creek. The consent review focused solely on minimal water flow rates and ensured other Creeks with good water supply simply flowed to a dry river bed and soon disappeared below ground.

Why was a consent review necessary and what has it achieved? What has maintaining a high flow in O'Shea Creek achieved?

Our View.

Discussions around minimum flows, surface and ground water, aquatic and terrestrial animal survival and expansion cannot always be absolute, and consideration should be given to ALL affected waterways in the Greenstreet area including both branches of the Ashburton River and all the Creeks in the area.

This requires is a group of people including farmers and residents, and Environment Canterbury who together monitor and have input into creek and river flows and minimum levels as well as allowed water takes for irrigation etc.

Farmers and residents want the best for the waterways. Collaboration and appropriate actions are required on a dynamic basis to maintain waterways and aquatic ecosystems. Trust is required to exist between all parties.

Why did ECan not collaborate and act sooner in the face of such a disaster? How has a consent review enhanced water distribution and river and creek biology?



Fig 3. O 'Shea Creek running a short distance and disappearing into the dry North Ashburton river.

Actions.

In a desperate effort to preserve the Creek, The Greenstreet Irrigation Society requested a dispensation from Environment Canterbury to divert water to the Creek to save the delicate ecosystem. This request was initially declined. Not only that, but they were treated in a manner not consistent with a **partnership dedicated to the good of our natural resource.** There seemed to be a lack of respect, trust and acknowledgement of experience.

After significant media coverage and public pressure, Environment Canterbury eventually allowed water to flow (be diverted) once again into the Creek. But much aquatic life was already lost. Our concern is that we may never see this aquatic environment like this again.

Are these actions not consistent with the mission statements of E Can? Why did it take media exposure to reverse the decision?

What's the Cost?

This is the question ECan is asking of us in their Long-Term Plan. Sometimes the cost of *not* doing something is greater than the cost of implementation.

Communication.

Of concern during this debacle is the absent response to repeated requests to be allowed to divert some water, paucity of reciprocating communication, disregard to sensibility, disregard for an ecosystem, relentless desire to apply "science" even in the face of obvious misjudgement and the attitude of being a protected, untouchable corporate entity who is and will always be "right".

Why is it so difficult to establish communication with E Can?

Outcome.

In the end common sense prevailed and water flowed. But why has this decision been deemed short-term and allowed only in a so-called emergency situation? Is maintaining suitable water-flow in all waterways, by using judgement and experience, not an action consistent with mitigating the (possible) effects of a changing climate?

It seems incongruous that an organization charged with working *with* communities to *protect* the environment can act in a way that has disastrous consequences. As one resident put it - Eco-terrorism.

Why does Environment Canterbury not acknowledge that water *must* flow in this Creek *continually* despite dry conditions, as it must in all Creeks in New Zealand so that these important aquatic ecosystems can thrive?

Allocation of Rates.

And then we are asked to provide feedback on proposed costs of a long-term plan laden with regulation, flood prevention and public transport emission control. Maybe Environment Canterbury should take a long walk down the (North) Ashburton River bed to see that the next flood is probably not that far away. Is the biodiversity budget sufficient to maintain our waterways or has there been expenditure unlikely to contribute to protecting the delicate aquatic environment? Has there been an allocation of funding for preventive maintenance? It would appear not if the image in figure 4 below is the responsibility of ECan.

Has gravel been extracted from the North Branch to the degree that will mitigate the effects of the next flood?

Does ECan actually have the resources to fully implement duties required to perform works consistent with the consent reviews? In other words, are there enough people available to look after the Creeks?

The Greenstreet Community, as do all communities in New Zealand, expects funds to be fairly allocated to ensure freshwater Creeks (and rivers) are supported, water flows continually at rates commensurate with aquatic life, Creek banks are maintained and Creeks are allowed to flow unimpeded to the rivers, and the flood-prone Ashburton River is maintained to the point of actually being safe.

We also expect, in return for our investments, to be treated with respect, to be listened to, and the wise advice of the community acknowledged.



Fig 4. Greenstreet Creek (dry) exit to river completely blocked due to lack of maintenance.

Summary.

We submit to ECan our views, ideas and requests in regard to the life and future of the Greenstreet Creek and other waterways in this area.

We would like to see constructive collaboration in such a way that all parties can be assured their goals and aspirations are met, and above all that those fish, eels, koura, bullies and all other animals in that Creek can live in the way nature intended.