

Response ID	5654782
Date of Contribution	17/04/2024 07:11:09 PM
First Name	Andrew
Last Name	Brough

### Your contact details

Email Address	andrew.brough@courtenayenvironmental.co.nz
Post Code	7671
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	

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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?	Yes
Please provide your phone number so we can contact you to schedule a hearing time	021 776944
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.

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## **Background**

As by way of an introduction I am an environmental engineering consultant that has been working in the wastewater and stormwater environments for over 30 years. Under the RMA I have prepared a large number of consent applications including the design, assessment of environmental effects and planning for wastewater systems for individual onsite sewage discharges, larger scale community systems, and large scale commercial trade waste discharges to land, and stormwater discharge consents for anything from single Lots to large scale subdivisions and commercial discharges. I have presented evidence at resource consent hearings and the environment court as well as acting on behalf of the Canterbury Regional Council as technical adviser for stormwater discharge consents at resource consent hearings.

## **Issue**

I understand that the Canterbury Regional Council (CRC) propose to change the fee for processing resource consent applications for on-site sewage from a deposit plus actual costs to a fixed fee. In my opinion this is unfair on many levels. In particular this does not represent the actual costs in a variety of scenarios where on-site wastewater discharge consents are required. In some of those circumstances the fixed fee represents around 33% of the capital cost of installing a system which would potential be a cost barrier to environmental improvement. The following is 4 examples of where on-site sewage discharge consents would be required and my estimate of the broad nature of time CRC would require to process the consent applications.

### **1. Failed Existing System**

Here someone has a failed older system typically a septic tank to boulder hole or gravity trench. Clearly the person cannot/should not be allowed to replace the system with the existing system and the planning Rules would not allow it. Depending on the environment a replacement system would consist of a septic tank to sand bed or secondary treatment to drip irrigation system. In terms of improvement to the nutrient discharge to the receiving environment (groundwater) these represent around a 66% reduction in nitrogen and probably 3 or 4 orders of magnitude for pathogenic bacteria. These would be designed in accordance with the current Australian/New Zealand standard and therefore comply with that part of the Permitted Activity Rules. This application currently is being “triaged” by the consenting team and providing all the correct information is submitted (i.e. passes the Section 88 check) is being processed promptly. This does not cost ECan much to do and the applicant should be rewarded and not be penalised with the fixed fee for improving environmental outcomes

### **2. Renewal of an Existing Consent Application**

Around the late 2000's CRC changed the policy so that on-site wastewater discharge consents were only granted for a period of 15 years. The first of these are coming up for renewal now and there will be a significant number that will require re-consenting in the next few years. In most cases these installations were with ‘modern’ treatment systems e.g. secondary to drip irrigation septic to sand beds using pump dosing, some were “lucky” and were granted consents with septic tanks to boulder holes. The re-consenting of most of these applications should be very straightforward, that is a check that the system is still working satisfactorily and the consent be renewed. In some situations a replacement land application system may be required. But in either situation it should be a straight forward process.

### **3. A New Consent for an Individual Property**

This is where your fixed fee is targeted. However, even here there are environmentally widely different environmental risks. As an example there are Lots on the Canterbury Plains and elsewhere that are less than 4 hectares but still of a significant size, e.g. in the 3 + hectare size. The only reason a consent is required is that the Lot is less than 4 hectares and does not meet that condition in the Permitted Activity Rule. Environmentally the discharge from that property has no more risk to the environment than the discharge from a 4 hectare property. While it is right and proper that CRC does environmental checks there is no other reason for not granting the discharge consent. These should and are being processed quickly by ECan staff. Examples would be areas where groundwater is very deep or there is no groundwater resource (e.g. hill country). Otherwise more time is required to carry out the environmental checks

#### **4. A Consent to Discharge as part of a Subdivision of Several Lots**

A fixed fee for a consent application for several lot subdivision will not reflect the cost of evaluating the risk to the environment compared with the discharge from a single Lot. A fixed fee penalises the single dwelling application and rewards the development of subdivisions. If CRC should wish to have a fixed fee it should be per Lot.

#### **Quality of Consent Applications and Processing Costs**

In addition to these examples the other matter is the quality of the consent application. As a conscientious private consultant I try to submit as robust a consent application as possible to make it as easy for the CRC staff to understand the consent application and impacts on the receiving environment. (if you don't understand the impact on staff and time of the quality of the applications please discuss that with them) I would hope that a comprehensive application would be reflected in lower costs for processing the consent application. In contrast where a consent application is minimalist i.e. that has the basic information to pass the Section 88 check, then CRC staff will be required to spend a lot more time getting the information themselves and this should be reflected in higher costs to process the application. If CRC is to adopt a fixed fee then to save costs for my client I would simply submit the least amount of information possible and leave it to CRC to carry out the bulk of the investigation under the fixed fee.

#### **Conclusions**

In conclusion I consider that a fixed fee for processing on-site sewage discharge consent applications does not reflect the very significant difference between the nature of consent applications ranging from replacement of a failed system to a large subdivision. The current recommended fixed cost is a significant cost compared with the capital cost of an on-site system and where re-consenting and replacement of existing systems is required is an unfair cost to pay. Equally the fixed cost model will potentially lead to less detailed consent applications being lodged with CRC bearing the cost to assess the applications so the applicants avoid a doubling of cost if a more comprehensive application is prepared.

#### **Alternative Charging Options**

The most straight forward option is to retain a deposit plus payment of actual costs. However, based on the options of types of consent applications discussed above there is the potential for a fixed cost model for Examples 1 & 2 and a deposit plus actual costs for options 3 & 4 with a larger deposit required where it is for a subdivision (say of 4 Lots or greater).



I am willing to discuss this submission if required,

Regards

Andrew Brough

Courtenay Environmental Consultants Ltd  
3/1314 West Coast Road  
RD 1  
CHRISTCHURCH 7671

Tel: 03 972 5324 or 021 776944