

# ***Submission***

## ***Environment Canterbury Draft Annual Plan 2014/15***

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PREPARED BY: Ashburton District Council      SUBMITTED TO: Environment Canterbury  
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### **Introduction**

Ashburton District Council welcomes the opportunity comment on matters addressed in Environment Canterbury's draft Annual Plan 2014/15.

Ashburton District Council wishes to make the following comments on specific proposals outlined Plan.

#### **1. Community Outcomes (Page 5)**

Ashburton District Council continues to support the community outcomes identified by Environment Canterbury.

Our only concern in the community outcomes continues to be around cultural wellbeing – “People’s recreational needs are met”. This Council would like to reiterate its previously stated position that while we support Environment Canterbury’s involvement in regional parks, we would not support Environment Canterbury becoming a funder or operator of a recreational facility, such as the way the Otago Regional Council has with the Dunedin Stadium.

#### **2. Proposed changes to the Revenue and Financing Policy – water activities (Page 8)**

Ashburton District Council recognises Environment Canterbury’s review of its revenue and financing policy was to provide more support to a collaborative approach to managing water in the region. This Council agrees that the community as a whole benefits from the economic, environmental and social benefits that come from the sustainable use of water to enhance agricultural production and the maintenance of the ecological quality of the region’s waterways. In general, Council agrees that it is appropriate for some of the costs of water management activities to be funded from general or targeted rates rather than user charges.

The proposed changes support greater involvement and ownership by Canterbury communities in water management, and underline the regional benefits of a wider range of water management work. Each of the proposed changes are specifically commented on below.

**Consent application process fee:**

Council agrees with the proposal to fund a portion of this from the general rate, but is unclear how much of a portion is proposed. As the majority of the benefit lies with the consent holder, Council considers that only a relative portion should be funded from the general rate. Council would not support the consent application process fees being fully funded by the general rate.

**Water science charge:**

Council supports the proposal to change the water science charge from a user-pays basis to a targeted rate. It is consistent and reasonable to align the funding basis of this charge with the majority of water management activities, and Ashburton District Council accepts the rationale of broader community value in managing water.

**Monitoring of permitted activities:**

Again, Council recognises this work benefits the wider community and supports the proposal to fund monitoring from the general rate.

**Consent administration fee:**

Given that there is a poor match between the consent administration fee and the work it funds, we support the proposal to abolish this fee.

**3. Proposed changes to the Revenue and Financing Policy -Council archives and community engagement activities (page 8)**

Council considers the functions of Council archives and community engagement are activities from which each ratepayer gains equal benefit. Ashburton District Council supports the proposal to rate for these activities on a uniform annual general charge basis.

**4. Establishing zone-based rating districts (submission form, question 3)**

In preparation of the 2015-25 Long Term Plan, Ashburton District Council understands that Environment Canterbury will consider whether rating districts for each of the Canterbury Water Management Strategy Zones should be established to advance the Canterbury Water Management Strategy.

While we appreciate that this is not a specific proposal in the Annual Plan for the 2014/15 year, Environment Canterbury has sought feedback on the proposal via 'question 3' of the submission form. It is surprising that no further information on this matter is provided anywhere else in the consultation material.

In principle, Council tentatively supports a move to establish zone-based rating districts to support the Canterbury Water Management Strategy. This approach would allow each CWMS zone to make recommendations appropriate for their specific area, in the knowledge that any changes in expenditure would only have a funding impact on their zone. This would better align expenditure and revenue with the specific projects within each zone. This Council also finds that the approach would complement the approach to fund the water science charge through a targeted rate on each area rather than across the region as a whole.

However, Council would appreciate further consultation on this matter as it feels unable to come to a fully informed opinion based on the minimal information presented to date. We would expect to have the opportunity to consider a revenue comparison between the current funding policy and under the proposed zone-based rating districts, and the specific impact on the Ashburton zone. In the 2014/15 year, Council notes that the Canterbury Water Management Strategy rate is proposed to be \$18.57 per \$100,000 capital value, which equates to a total of \$2,385,477. Council would appreciate further information on what this rate comprises of, and how it would compare to the proposed rate based on the

Ashburton water zone area. We anticipate that as the Ashburton water zone committee boundary aligns with our territorial authority boundary, this proposal would mean no or little difference for our ratepayers, but would appreciate confirmation prior to giving our full support to a move to zone-based rating districts.

Council requests that Environment Canterbury consult further with Ashburton District Council and the wider community on this proposal.

## **5. Air Quality – Clean Heat Initiatives (Page 10)**

Council supports efforts to achieve air quality targets, however now the Clean Heat Ashburton programme has ended, Council is uncertain what is ahead for Ashburton in this area. Your Annual Plan states that an incentive programme for Ashburton is to be developed and co-ordinated collaboratively between Ashburton District Council and Environment Canterbury, however at this stage, this Council has no knowledge of what is planned to help achieve air quality targets going forward.

The draft Annual Plan proposes that Ashburton residents will incur a ‘targeted clean heat incentive rate’ of \$3.75 per \$100,000 capital value. It is recognised that this rate was previously directed towards assessing homes to see if they qualified for the clean heat subsidy, but now that the programme has finished, it appears that this targeted rate is not directed at anything in particular.

Council requests that Environment Canterbury explicitly outline what the targeted rate on Ashburton will be utilised for in the 2014/15 year.

If there are no plans or projects to improve air quality specifically in Ashburton in the 2014/15 year, Council believes the targeted rate on Ashburton should be removed, and any mention of incentive programmes in Ashburton also removed from the text on page 11 of the draft Annual Plan.

## **6. Biodiversity and Biosecurity (Page 13)**

Council supports Environment Canterbury’s work in this area. The Immediate Steps programme to accompany the Canterbury Water Management Strategy is supported.

Council raised concern in a prior submission in regard to a review of the Canterbury Regional Biodiversity Strategy and the future of this project at a regional level. While Council is comfortable with priority being given to the Canterbury Water Management Strategy in the short to medium term, we recognise that at some time in the future, the region will need to take a fresh look at the bigger picture of biodiversity. We encourage Environment Canterbury to commit to and complete a review of the Canterbury Regional Biodiversity Strategy, and would appreciate communication on the status of the review.

It is noted that Environment Canterbury has generally been supportive of the Ashburton District Biodiversity Working Group, established to implement an action plan that helps give effect to both the Canterbury Region Biodiversity Strategy and the Canterbury Water Management Strategy. Council acknowledges this ongoing support.

Council supports the review of the Regional Pest Management Plan in the 2014/15 year and would appreciate having the ability to discuss the proposed review process and approach prior to the beginning of the review.

## **7. Canterbury Water Management Strategy (Page 19)**

This Council supports work in this area and in particular the collaborative approach being taken with Environment Canterbury, territorial authorities, zone committees and communities working together to implement the actions set out in Zone Implementation Programmes to achieve the goals of the Canterbury Water Management Strategy.

**Ashburton District Council does not wish to be heard in support of this submission.**

A DALZIEL  
**Chief Executive**