

Submission

Environment Canterbury Draft Annual Plan 2019-20

PREPARED BY:	Ashburton District Council	SUBMITTED TO:	Environment Canterbury
	PO Box 94		PO Box 345
	ASHBURTON		CHRISTCHURCH

Introduction

Ashburton District Council welcomes the opportunity to comment on matters addressed in Environment Canterbury's draft Annual Plan 2019-20.

Ashburton District Council wishes to make the following comments on specific areas of the Plan.

1. Freshwater Management

- 1.1 Ashburton District Council continues to support Environment Canterbury's role in freshwater management for the region.
- 1.2 We note that on page 14 of the Plan, reference is made to the 'Resource Management Act Water Framework' with specific mention that, 'Research is ongoing to determine how consent reviews may be considered amongst other local solutions as an alternative or to complement plan change proposals in the Ashburton/Hakatere River catchment'. While we are unclear as to the detail of the research we look forward to being a part of any future conversations about these consent reviews in our District.

2. Biodiversity and Biosecurity

- 2.1 Ashburton District Council acknowledges the focus of Environment Canterbury in biodiversity and biosecurity.
 - 2.2 With regard to biodiversity, given the limited resources available to Ashburton District Council, we note and support the reference on page 20 to the need for 'extensive collaboration' and the associated aims.
 - 2.3 We also note the proposal (on page 21 of the Plan) to alter the Revenue and Financing Policy concerning a single targeted rate on all rural land. We have provided our view on this in Section 5 of this submission.
 - 2.4 Ashburton District Council officers are involved with the Braided Rivers Action Group project in 2018-19 that is seeking to establish the ownership of land within and on the margins of the large alpine-fed braided rivers. While we note that this project target has been highlighted in grey in the Plan as it was a 2018-19 target we are unclear as to the planned work for 2019-20.
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We suggest that while the project is valid in its intention, it does seem an almost impossible task to deal with. We have noted the current appeal against ECan's position in the Court of Appeal. We look forward to discussing the future of the project with Environment Canterbury as soon as practicable, as we are unclear about the potential costs to Council.

3. Hazards, Risks and Resilience

- 3.1 Ashburton District Council acknowledges the position of Environment Canterbury about hazards, risk and resilience.
- 3.2 Ashburton District Council officers are members of the Regional Climate Change Working Group and support the proposed amendments to the measure and targets (page 32 of the Plan), particularly in improving the understanding of the risks (threats and opportunities) to the Canterbury region from Climate Change. We support continued collaborative action to maximise the benefits of sharing knowledge and resources.

4. Air Quality

- 4.1 Ashburton District Council acknowledges the role of Environment Canterbury concerning air quality.
- 4.2 Council is pleased to see that the number of days in Ashburton with PM10 exceeded have steadily reduced over the past ten years. We support the continued monitoring and enforcement of air quality in Ashburton District throughout the year.
- 4.3 Council believes that there is a need for ongoing education around smoke management and avoidance of nuisance to continue these favourable air quality trends.
- 4.4 We note that the expenditure on Air Quality in the draft Annual Plan is 19% lower than the LTP. We oppose this reduction if the result is a reduced level of service for our residents from the current standards.
- 4.5 With regards to Non-Domestic Emissions (page 45), there are concerns expressed about rural stubble-burning from our urban residents. We believe that more could be done in this area by Environment Canterbury with regards to education and enforcement.

5. Proposed changes to the Revenue and Financing Policy – Regional Targeted Pest Management rates (Page 7 of the RF Policy)

- 5.1 Ashburton District Council acknowledges the proposals contained within the Revenue and Financing Policy.
- 5.2 Ashburton District Council opposes this proposal to amend the land value/land area split for targeted pest management rates from 50% land value/50% land area; to 80% land value/20% land area.
- 5.3 As all pest rates will be levied on a regional basis for all rural classified properties, Council is concerned that rural ratepayers in our District will be burdened with a rate that is disproportionate to the benefits they receive. Many rural properties in our district are likely to have a higher land value than other areas in Canterbury, which are more likely to receive a far greater benefit from this work.
- 5.4 We support the retention of the status quo 50% land value/50% land area split until Environment Canterbury can demonstrate proportionate benefits accruing to our rural ratepayers. We do not

see a strong evidential basis in the RF Policy or the consultation document to support the proposed amendment.

6. Proposed changes to the Fees & Charges Policy

- 6.1 Ashburton District Council opposes the establishment of the proposed annual water-use data management.
- 6.2 We oppose the introduction of this fee as water consent holders already face significant compliance costs in sourcing and providing water monitoring data to Environment Canterbury. Council supports the retention of the status quo.
- 6.3 Ashburton District Council supports the recovery of costs for non-compliant incidents response. We believe that it is important that the natural resources of our region are managed well for both current and future generations. We note that it is unclear what the minimum charge may be in this situation but would encourage this is set at a level that has a deterrent effect.
- 6.4 As a final point, Ashburton District Council notes that the Fees and Charges Policy does not show the existing financial year fees and charges in comparison with the proposed fees and charges. We believe that the inclusion of both years information would be a more transparent way of providing information to stakeholders.

Ashburton District Council thanks Environment Canterbury for the opportunity to provide this submission. We do wish to be heard in support of this submission.

DONNA FAVEL
Mayor

HAMISH RIACH
Chief Executive