

# *Submission*

## *Environment Canterbury Draft Annual Plan 2020-21*

---

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

---

### **Introduction**

Ashburton District Council (Council) welcomes the opportunity to comment on matters addressed in Environment Canterbury's draft Annual Plan 2020-21 and on the strategic questions posed for focusing the Long-Term Plan 2021-31.

Council wishes to make the following comments on specific areas of the draft Annual Plan.

### **General Comments**

- 1.1 Council notes that the Environment Canterbury Long-Term Plan 2018-28 indicated an average rate increase in Year 3 (2020-21) of 5.5%, while the draft Annual Plan 2020-21 is showing an average rate increase of 9.8%.
- 1.2 We acknowledge that this is largely due to the increase in funding in the public transport service, of which our district has little public transport services (the only service being the total mobility program) provided by Environment Canterbury.
- 1.3 While Council is concerned with this given that Environment Canterbury's Financial Strategy (which forms a key part of the Long-Term Plan 2018-28) has a rate increase limit of 6% for the first three years of the LTP, the impact on residents in our District appears to be well under the 6% limit.
- 1.4 Council is curious that this draft Annual Plan is not being signalled to the community as a significant change to the Long-Term Plan 2018-28 and that the subsequent feedback process is not a formal submission process. Our interpretation of the Local Government Act would be that this is a significant deviation from the Long-Term Plan 2018-28 and that a formal consultation approach should have been undertaken.
- 1.5 In our Long-Term Plan 2018-28, we agreed to fund a great proportion of our 'people-related activities' through a Uniform Annual General Charge (UAGC). We suggest that Environment Canterbury considers greater use of the UAGC rate through its Long-Term Plan review of funding mechanisms over the next 12 months.

## **Freshwater Management**

- 1.6 Ashburton District Council continues to support Environment Canterbury's role in freshwater management for the region.
- 1.7 We note that additional resources have been included into the draft Annual Plan to drive this area of business. Council is supportive of this and agrees that this is a complex portfolio for Environment Canterbury.
- 1.8 Council notes that additional resources are included in the Zone and Regional Delivery programme for two new positions to support coordination in the southern zone and ongoing implementation. We are not clear if the Ashburton Zone Committee is included in this southern zone. Council is seeking clarification about what benefits we should expect to see if we are in this zone.
- 1.9 Council has been a supporter of the Zone Committee model since they began. However, there is a sense that their focus and direction has changed over time and Council questions if they are still serving the purpose for which they were originally established for.
- 1.10 We note that consent reviews in the Ashburton/Hakatere catchment commenced in 2019-20 and support the continued work in this areas in 2020-21. We look forward to being informed of any future conversations about these consent reviews in our District.

## **Biodiversity and Biosecurity**

- 1.11 Ashburton District Council acknowledges the increased focus of Environment Canterbury in biodiversity. We note the view that the major threats to biodiversity are: introduced plants and animal pests and land-use change and intensification.
- 1.12 Ashburton District Council officers have been involved with the Braided Rivers Action Group (BRAG) project, but notes that this work tailed off in 2019-20. Council notes that the BRAG is still considered to be a part of the collaborative approach for braided rivers and looks forward to being involved as appropriate.
- 1.13 We note the focus on developing ki uta ki tai (from the mountains to the sea) plans with communities but question if the target of 1 plan for a priority river per year is enough given the noted biodiversity issues.

## **Climate Change, Hazards, Risks and Resilience**

- 1.14 Ashburton District Council acknowledges the position of Environment Canterbury about climate change, hazards, risk and resilience.
- 1.15 Ashburton District Council officers are members of the Canterbury Climate Change Working Group, Canterbury Civil Defence Emergency Management (CDEM) Group and the Canterbury Natural Hazard Risk Reduction Group. We support continued collaborative action to maximise the benefits of sharing knowledge and resources in these areas.
- 1.16 We note the work planned in 2020-21 to identify and classify potentially contaminated land in Ashburton District. We look forward to being informed of this work as it is commenced and progressed.
- 1.17 Council is concerned that increased rates are being taken in this area as reserve funding to respond to climate change natural hazards. We consider that the collection of rates now for

possible future events or scenarios is at odds with the principals of inter-generational equity (as outlined in your Financial Strategy 2018).

### **Air Quality**

- 1.18 Ashburton District Council acknowledges the role of Environment Canterbury concerning air quality.
- 1.19 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.
- 1.20 Council believes that there is a need for ongoing education and enforcement around smoke management and avoidance of nuisance from smoke leaving properties boundaries. We support Environment Canterbury's continued commitment to this need.

### **Transportation**

- 1.21 Council understands that an Ashburton community group is discussing with Environment Canterbury Community the need for a community vehicle service in our district. We support these discussions and look forward to being informed of progress about this investigative work.

### **Regional Leadership**

- 1.22 Council supports Environment Canterbury's ongoing secretariat and executive support for the Regional Forums. We believe this adds value for all local authorities in Canterbury and that the sharing and understanding of issues helps us all to ensure we have strong relationships in place for when challenges invariably arise.

### **Strategic Direction Questions**

**Our current purpose statement is: Facilitating sustainable development for the Canterbury region. Should we change it? And if so, to what?**

- Council agrees with this purpose statement and does not see a need to change it.

**What do you think the most pressing issue for freshwater is in your local area?**

- The most complex issue to deal with for freshwater is balancing the desire for improved freshwater quality with the economic and social costs of being able to achieve such targets.

**What do you think the future focus of our ten Zone Committees should be?**

- Council has been a supporter of the Zone Committee model since they began. However, there is a sense that their focus and direction has changed over time and we question if they are still serving the purpose for which they were originally established for.
- Council is concerned that the Auditor-General decision (from the Forest & Bird legal challenge in the High Court over the CWMS) barring water zone committee members from taking part in debates and votes on matters in which they have a financial interest will undermine the value, ability and efficacy of the Zone Committees.
- 

**What do you think the community could/should do to respond to climate change?**

- The understanding and awareness of climate change and what it might mean to the communities in which people live is the largest challenge facing a successful response to climate change. Our [Climate Change policy](#) is our first step in educating and preparing our community.

**What bothers you most about climate change and how much impact do you think it will have on the region?**

- Planning and building resiliency for the impacts of climate change is dependent on the threats and opportunities for each community.

**Is there anything keeping you awake at night that you think Environment Canterbury can help with now, or in the future?**

- Farming consent conditions effectively limit the options available for different farming types. Therefore it would be good if Environment Canterbury could undertake some evidence-based research as to what the future of agriculture might look like in the region.

**We want to ensure that, in the face of climate change or when a disaster strikes, the region can feed itself. How do you think we might do that?**

- Our significant agricultural base would mean that as a district we are likely to be able to comfortably feed ourselves and the wider Canterbury region in the event of a natural disaster. Transport linkages would be our main concerns during this time.

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

NEIL BROWN  
**Mayor**

HAMISH RIACH  
**Chief Executive**