

# Submission

## Environment Canterbury Draft Long Term Plan 2024/34

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PREPARED BY: Ashburton District Council    SUBMITTED TO: Environment Canterbury  
PO Box 94    PO Box 345  
ASHBURTON    CHRISTCHURCH 8140  
[Mayor@adc.govt.nz](mailto:Mayor@adc.govt.nz)    [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)

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### Introduction

1. Ashburton District Council (Council) welcomes the opportunity to comment on Environment Canterbury's draft Long Term Plan 2024/34.

### Rates Revenue Increase

2. Council notes that the Environment Canterbury's (ECan) Draft Long-Term Plan 2024-34 is proposing a rates revenue increase of 24.2% across the region.
3. In Ashburton District, the table below shows average rates increase in dollar terms. This means that in Year 1, the average rates increase for Ashburton rural properties is 24% and for urban properties the average increase is 31%.

Ashburton District	CV of Property	2024/25 Rates (preferred option)	2023/24 Rates	Average increase in \$ terms.	Increase per property per week
<b>Rural (Wakanui)</b>	\$4,760,000	\$2,681.20	\$2,157.21	\$523.99	\$10.07/week
<b>Rural (Rakaia)</b>	\$13,510,000	\$15,633.84	\$11,905.28	\$3728.56	\$71.70/week
<b>Urban</b>	\$430,000	\$409.66	\$311.62	\$98.03	\$1.88/week

4. Council acknowledges the challenging environment we have all faced as the Long Term Plan budgets have been developed. We too have had to make difficult prioritisation decisions to ensure our proposed rate increase remains affordable for our community, while still getting the work done.
5. Council notes that Environment Canterbury's draft long term plan and consultation document takes an overarching approach to explaining where funds are proposed to be spent. We found this approach difficult to determine where expenditure would apply in Ashburton District. We suggest it would be helpful to include clearer information on where and how our ratepayers' money will be spent in the Ashburton District, and to ensure accountability for goals that ECan is aiming to achieve in Ashburton District.

## Water and Land | Te Wai me Te Whenua

6. Ashburton District Council continues to support Environment Canterbury's role in freshwater management for the region.
7. Council thanks and supports Environment Canterbury's involvement in the urgent action needed to restore and preserve Ashburton Lakes/Ōtuwharekai and urges ECan to continue their work in this space as a priority.
8. Council supports increased investment in the Hekeao Hinds Water Enhancement Trust and thanks Environment Canterbury for its ongoing work on the Hekeao/Hinds River catchment.
9. Council supports the prioritising of the Ashburton River/Hakatere river review scheme for 2024/25. We encourage partnership with council and key agencies as this work proceeds.
10. Council supports proposed schemes and projects listed for maintenance and capital expenditure in Ashburton District and acknowledges the significance of work planned in the draft plan.
11. In ADC's draft LTP 2024/34, we are consulting with the community on whether we should get out of providing the Stockwater service by 30 June 2027. We look forward to discussing the implications of this, including any role ECan will play in stockwater channels that remain (should this proposal be confirmed).

### Carters Creek

12. Council supports the proposed maintenance expenditure (\$1,500,000 in 2027-2029) and capital expenditure (\$1,500,000 in 2028-2030) on Carters Creek but requests that this work is brought forward to Year 1 in the final Long Term Plan. Carters Creek has been the cause of flooding of residential properties and roads through Tinwald on multiple occasions in recent years. Therefore, Council strongly supports any work that can be undertaken to reduce or eliminate the risk of flooding for these affected residents by diverting flood flows to the Ashburton River.
13. Carters Creek is also a contributor to the water quality issues at Lake Hood, as the creek discharges directly into the north-western corner of the lake. Council is aware through water quality testing that Carters Creek contains high phosphorous levels, particularly during storm and high flow events. As increased phosphorous levels are one of the main contributors to poor water quality in Lake Hood (resulting in the recent algal blooms), Council supports any action that can be taken to remove flood flows from entering Lake Hood. In this regard, Council endorses the Carters Creek Catchment Group's submission and requests the work is moved to begin in Year 1 of the LTP.

### Ashburton River Consent Review

14. Council would also like Environment Canterbury to allocate funding during Year 1 of the LTP towards reviewing the appropriateness of the recent Ashburton River consent review process that imposed new Ashburton River minimum flow conditions on consent holders. The new minimum flow restrictions that took effect from 1 July 2023 have had dire consequences for our Ashburton community, including many unable to irrigate farmland in the summer of 2023/24, the loss of biodiverse ecosystems in Greenstreet Creek and the inability for river water to even be taken into Lake Hood under the current consent or via a new non-consumptive take.

## Lake Hood Water Quality

15. Council is the predominant landowner of Lake Hood and surrounding land. Due to the new Ashburton River minimum flow restrictions, very little water has been able to be taken from the Ashburton River into the lake over the 2023/24 summer. Expert advice received is that one of the contributors to the algal bloom in the lake is the inability to take sufficient water to flush the lake. Council and the Lake Hood Water Quality Taskforce are currently working through mitigation options to improve water quality in the lake and would appreciate assistance from Environment Canterbury. One of Council's priorities is to find a way to increase water flows into Lake Hood from the river in order to improve water quality. However, the ability to do so is severely restricted due to the Ashburton River minimum flows regime. Council would therefore support funding being allocated to review the recent Ashburton River consent review and undertake a plan change/further consent review to enable more practical and appropriate restrictions to be set in place.

## Mt Somers

16. This community has experienced flooding during recent heavy rainfall events (most notably the 2021 Canterbury Floods) that has both inundated and threatened residential dwellings within the Mt Somers Township. It is noted that due to the regular occurrence of flooding some residential property is unable to be insured given the threat of repeat inundation.
17. Our team at Ashburton District Council have recently completed investigations into a potential cut-off drain to protect Mt Somers Township from rural catchment flooding. The investigations are still to be formally completed by Council, but the output from the work will form the basis of future discussions with Environment Canterbury officers.
18. Council would support appropriate funding provision being made in Year 1 to progress further work on this matter towards finalising a practical solution to address this flooding risk.

## Update on Planned Ashburton Catchment Works

19. Council notes that Ashburton urban properties are charged for catchment works to mitigate flood risk. However, the planned work has not been undertaken yet. Council would like to receive an update on the planned catchment works as it is crucial for mitigating flood risk to Ashburton township.

## Consultation Topics

### Environmental Regulation & Protection | Ngā mahi tiakina me ngā whakaritenga taiao

20. Council supports Environment Canterbury's Option 2 that enables effective and efficient environment regulation and protection services through reduced investment towards community funding.
21. Council notes that reduced investment on community incentive and grants funding may reduce our community's ability to progress projects within the district.
22. Council supports Environment Canterbury's role in pest management which leads to preservation of the natural environment and indigenous species. We would draw your attention to recent sightings of wallaby in Ashburton District and seek collaborative action to enable effective results.

23. Council supports the development of a regional integrated plan by 2028 as we see value and effectiveness in taking an omnibus approach that combines the Land and Water Regional Plan, Regional Coastal Environmental Plan, and the Regional Air Plan into a single regulatory plan. We urge ongoing liaison with Council over this period of review.
24. Council strongly believes that Environment Canterbury's biosecurity and biodiversity functions are people focused activities. Therefore, we suggest it would be more appropriate to fund these through the Uniform Annual General Charge (UAGC).
25. Council supports proposed increased investment to improve consents delivery timeframes. We believe that delays to resource consenting have immense implications for the wider Canterbury community and the consequential impacts on the ECan's reputation as regulator.

### **Community Preparedness and Response to Hazards | Te whakarite hapori me ngā urupare mōrearea**

26. Council supports Environment Canterbury's ongoing crucial role towards flood protection and resilience work.
27. Council supports ECan taking a greater role in investigating and providing solutions for managing rural land drainage particularly where such flows are impacting on rural townships.
28. Council supports Option 2 in principle and welcomes increased investment in Civil Defence and Emergency Management as it improves the region's capability to respond to adverse events.
29. Council notes that in Civil Defence and Emergency Management, maintaining workload has been challenging over the years due to resource shortages. We support uplift in the number of staff as this will enable coordination of training across the group and delivery of consistent messaging to the community, as clear and consistent communication is one of the most effective forms of preparedness to respond to emergency situations.
30. Council supports inclusion of new service measures 19, 20, 21, &22 and believe that this will help achieve enhanced resilience and improved service delivery.
31. Council supports Environment Canterbury's ongoing work on climate change, adaptation, mitigation, and resilience.
32. Council officers and elected members participate in the work of the Regional Climate Change Councillor Workshop, 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.
33. Council do not support increasing the use of general rate and targeted rates to fund Flood and River Resilience services but rather urges Environment Canterbury to reassess the scope of the people benefit associated with these works and move to the UAGC where appropriate.
34. Council requests ECan review how river catchments are rated for and funded. The benefits of flood protection affect all in the community, not just neighbouring properties, therefore the rating policy should reflect this. We consider this needs an urgent review.

## **Public Transport / Ngā waka tūmatanui**

35. Council supports increased investment on the Community Vehicle Trust. Council thanks Environment Canterbury for the continued inclusion of our Community Vehicle Trust in this funding and wishes to note its support for the future. We were however confused by the property example provided on page 53 of your Consultation Document relating to what this Ashburton property pays towards public transport and request some clarification.
36. Council supports continued and increased investment in the Total Mobility scheme. Council notes the continued funding of the Ashburton Total Mobility scheme. For our eligible residents with accessibility issues this program enhances their quality of life, therefore we support this remaining in the Long Term Plan.
37. Ashburton District Council would like to be considered for future public transport pilot programmes, particularly for the Ashburton urban area.
38. Ashburton District Council believes that consideration should be given in the future to a daily Ashburton-Timaru and Ashburton-Christchurch public transport system to cater for the working population who commute into, and out from, the district.

## **Fees and Charges Schedule**

39. Council agrees with the use of fees and charges for activities where an individual directly benefits rather than a group or the community as a whole.
40. Therefore, Council supports the use fees and charges to pay for activities such as consents, compliance, and monitoring.
41. Council supports the proposal to move towards a fixed fee approach for the consenting work. We believe that fixed fee approach will facilitate applicants/customers by enhancing cost certainty while improving transparency and administrative efficiency for Environment Canterbury.

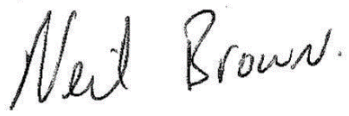
## **Uniform Annual General Charge/Uniform Annual Charge (UAGC/UAC)**

42. Council do not support Environment Canterbury's low use approach of the UAGC as a funding tool. Therefore, we are not in support of the proposed option of keeping UAGC at 8% of total rates.
43. Council has commented in previous submissions about increasing the use of UAGC where appropriate.
44. Council supports option 2 and urges Environment Canterbury to consider utilising the UAGC at at least 12% of total rates or higher to better reflect the benefits of its programmes across the region and to alter the spread of the rates burden.

## **Regional and Strategic Leadership**

45. 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 when challenges invariably arise.

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**