

12. To support the work at Ashburton Lakes/Ōtuwharekai, Council is currently developing a 30-year plan for Lakes Camp (Ōtautari) and Clearwater (Te Puna a Taka) that represents the views of iwi, the community, and the council.
13. Council urges Environment Canterbury to continue their work in Ashburton Lakes/Ōtuwharekai as a priority.
14. Council notes that the 2022/23 annual budget for water and land has been affected by a reprioritisation of science work to deliver requirements of the Government's Essential Freshwater package and acknowledges the importance of evidence and data to support good decision-making.

Biodiversity and Biosecurity | Te Rerenga Rauropi me Te Whakahaumarau Rauropi

15. Ashburton District Council acknowledges the position 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.
16. This year Council has employed a Biodiversity Officer and we look forward to this role enhancing our relationship with Environment Canterbury.
17. Council notes the plan for Braided River Revival/Whakahaumanu Ngā Awa ā Pākihi, and supports Environment Canterbury's role in coordinating a regional alliance for reviving the braided rivers, as critical ecological corridors from the mountains to the sea/ki uta ki tai. Council looks forward to receiving further details of this plan.

Climate Change and Community Resilience | Te Whakamahanatanga o Te Ao me Te Aumangea o te Hapori

18. Ashburton District Council acknowledges the position of Environment Canterbury on climate change, hazards, risk and resilience.

Climate change resilience

19. 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.

Leading flood and river resilience

20. Council notes that the draft Annual Plan includes finalising the scope of a Regional River Strategy and review of a Gravel Management Strategy.
21. The May floods of 2021 highlighted that the strategic management of gravel and rivers is critical to the resilience of our community, and so Council urges that this work continues as a priority so that actions can be progressed urgently.
22. We also note that the draft Annual Plan includes completing a review of the River Rating District Committees' structure, membership, and funding.
23. In this review we urge you to consider building on what works well in the current arrangements, the wider catchments of the rating areas, the need for these committees to have appropriate local knowledge and skillsets, and the principle of no taxation without representation.

24. We request Environment Canterbury to investigate extending the Dry Creek rating area following the May 2021 flood event.

Air Quality, Transport and Urban Development | Te Pai o Te Hau Takiwā, Ngā Momo Waka, me Te Whanaketanga o Ngā Tāone

Transforming Public Transport

25. Council notes the inclusion of \$5,005 in the draft plan for our Community Vehicle Trust. Council thanks Environment Canterbury for the continued inclusion of this funding and wishes to note its support for the future.
26. Council notes the continued funding of the Ashburton Total Mobility scheme of \$35,019 in 2022/23. For our eligible residents with accessibility issues this program enhances their quality of life, therefore we support this remaining in the Annual Plan.

Regional and Strategic Leadership | Te Hautūtanga ā-Rohe, ā-Rautaki hoki

27. 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.

Part Two – Consultation Topics

Topic One | Kaupapa tuatahi | Changing the bus fare structure

28. Given that Ashburton District does not receive this service, we offer no view on this proposal.

Topic Two | Kaupapa tuarua | Flood recovery and protection

29. Given the significant impact of the May 2021 floods in Ashburton District we are pleased to have an opportunity to comment on issues relating to the Ashburton/Hakatere River.

Recovering from the May 2021 flooding. Is borrowing and repaying through general rates the right approach for this regionally significant event? How else might we pay for our share of this work?

30. Council supports the use of borrowing to fund flood recovery of a capital nature. In addition to utilising our disaster recovery fund, Council used this approach to fund May 2021 flood recovery capital expenditure, and believes it is an appropriate use of the funding tools that are available to councils.
31. To approach this prudently, Council urges analysis of potential increased risk over time due to climate change (increased frequency of extreme weather events) and whether recovery capital investment should be funded over shorter timeframes to avoid potential overlaps of loans.

How do you think recovery from flooding of this scale - events that impact state highways, bridges, rail and power for example – should be funded in the future?

32. Borrowing and repaying for long-term capital expenditure using this method is consistent with the principle of inter-generational equity, which spreads the costs of assets across the ratepayers that will benefit over the life of the asset.
33. Council acknowledges the Government's \$7.5 million co-funding of the total estimated \$20 million cost of flood recovery.

Reviewing flood protection in Ashburton District

34. Council supports, in principle, the preferred option in the consultation document. Option one; redistribute rates in the Ashburton River/ Hakatere rating district to better reflect the benefits received from flood protection. Those being asked to pay for this benefit who have not previously had to pay, however, should be communicated with directly by Environment Canterbury so the community understands the work.

Proposed river rating classes in the Ashburton River/Hakatere rating district. Do you support the proposed redistribution of rates for flood protection in the Ashburton River/ Hakatere rating district?

35. Given Council's local knowledge of the specific areas of Ashburton District we are pleased to have an opportunity to comment on proposed river rating classes in Ashburton/Hakatere River.
36. Council supports, in principle, a redistribution of rates for flood protection in the Ashburton/Hakatere River rating district.
37. Council agrees, in principle, with Environment Canterbury's Revenue and Financing Policy statement that targeted rates are used to 'ensure that the cost of an activity is borne by the group(s) deemed to derive most benefit from it, or who contributed to the need for the activity'.

Topic Three | Kaupapa tuatoru | Future funding for action in response to climate change

Would you support a levy to accelerate action in response to climate change?

38. Council seeks a deeper understanding of the Climate Change Action Plan before committing to support the levy.
39. Council urges that the Climate Change Action Plan in co-design with the community is progressed as a priority work stream of Environment Canterbury.

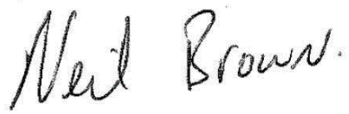
What current or future projects or activities would you like to see funded by such a levy?

40. It's Council's position that the Climate Change Action Plan, in co-design with the community, should determine the actions.

Should these types of activities be funded through a specific levy paid by all ratepayers, to recognise the collective benefit of tackling climate change together?

41. Council would support the use of the Uniform Annual General Charge (UAGC) to fund these actions given the collective benefit of tackling climate change as a region.

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