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Christchurch City Council submission on the Long-Term Plan 2021-31

1. Christchurch City Council (the Council) welcomes this opportunity to provide a submission on the Environment Canterbury Long Term Plan for 2021-2031. We would like to be heard in support of our submission. The Council values its collaborative working relationships with Environment Canterbury, Ngāi Tahu and other councils, which range across governance, management and staff levels and much of the Environment Canterbury work programme. Both our councils are grappling with many of the same challenges as we plan and budget for the next ten years.
2. As a fellow member of the Greater Christchurch Partnership, the Council fully supports Environment Canterbury's vision of a thriving and resilient Canterbury. We look forward to continuing to work with Environment Canterbury and others to develop the Partnership's Greater Christchurch 2050 Strategic Framework that will bring together our shared aspirations.

Challenges and opportunities

3. Climate change is the biggest intergenerational challenge of our time. One of the Council's five strategic priorities is meeting the challenge of climate change through every means available. The Council supports Environment Canterbury's recognition of its leadership role in ensuring climate change and community resilience are a vital part of the transformation for the future of our region. It is critical that the Canterbury region plays its part in mitigating the worst effects of climate change, by increasing efforts to reduce greenhouse gas emissions.
4. Cities thrive when people can move around them easily and have a range of sustainable travel choices for accessing opportunities. Increasing the share of travel by public transport in our urban areas has a critical role to play in creating a more inclusive, accessible, safe and sustainable transport system. The public transport futures business cases represent a significant step toward increasing the attractiveness and uptake of public transport in Greater Christchurch. Environment Canterbury will have a fundamental role in bringing about the transformational change needed. We look forward to working with you to deliver the public transport futures business cases that will provide greater access to more services by more people right across the city.
5. We support the public transport enhancements proposed, but suggest that a stronger signal is provided regarding the extent of the transformative steps needed over the next decade, in line with the public transport futures business cases. It is noted that the spending profile from the public transport futures business cases had already been flattened to take into consideration spending constraint which reduces the ability to make transformative steps. In addition, we support further work on the affordability of public transport as part of the review of bus fares, including consideration of free services and the reinstatement of the Central City Shuttle.

6. We also suggest greater recognition of the importance of improving access to opportunities by living closer to our destinations. Our urban form is a key driver of our dependency on private vehicles. We do not want our cities to be designed primarily to support car travel. Rather, we want to design them to achieve a broader range of objectives including more liveable and healthy streets, cleaner air, and greater opportunities for inclusive access and social and economic activity.
7. It is critically important to give effect to new and recently-amended national environmental standards and national policy statements on water, air and land use planning. We note that while national direction on freshwater is identified as a challenge in Environment Canterbury's draft LTP, the Financial Strategy appears to apportion less funding to the Water and Land portfolio than the Air, Transport and Urban Development portfolio. As we have submitted in the past, the Council strongly recommends the provision of adequate funding to enable robust statutory processes to protect our freshwater resources. The level of investment in this area is not clear from the Financial Strategy so we would welcome clarification.

Regional and strategic leadership portfolio

8. It is vital that we work collaboratively to address the many, complex issues we face. We recognise that Environment Canterbury are helping to coordinate and lead many of the collaborations that seek meaningful solutions for our region. As an example, the Christchurch-based Networking for the Environment Group led by Environment Canterbury has proven to be an excellent way to build connections and capacity across community organisations active in the environmental sector. We would like to see this group continue and consider it provides an excellent model for similar arrangements elsewhere in our region.
9. The Council strongly supports the proposal to boost resources for the regional implementation of Enviroschools. This programme is delivering great results for our tamariki, community and environment. Additional investment is supported to help meet the growing demand for this outstanding education programme. The Council is also looking at options for increasing the certainty of funding to support the local delivery of this programme.
10. We support the proposal to create a contestable fund to support community projects. The Council has several funds that also support community-led action and the results from these funds are very positive. Council staff would be happy to share their experiences in creating and running community focused funds. This engagement would be useful to ensure that Council and Environment Canterbury funds complement each other and work well with funding from other agencies and sources.

Leading regional planning, consents and compliance

11. The Council strongly supports including the review of the Regional Policy Statement, Regional Coastal Environment Plan and freshwater planning, with the intention of notifying them together in 2024, as indicated in both LTP options. These planning documents are essential for the effective and efficient management of issues that are significant across much of the region, such as urban development, coastal hazards and freshwater. The appropriate location and density of urban development, in particular, will influence the demand for travel and the use of private motor vehicles and therefore greenhouse gas emissions and congestion within Christchurch City.
12. The Government is undertaking significant resource management reform that is due to be enacted by the end of 2022. This may result in a change to the format and some of the content of both regional and district planning, particularly with the proposal for joint plans. However, current indications are that many of the issues needing to be addressed will remain the same and much of the existing national direction, such as that contained in National Policy Statements relating to urban development,

freshwater and coastal issues, is likely to remain relevant at least in the short to medium term. On that basis, work on these issues could begin in year one of the LTP as proposed, with the format being adjusted if necessary once the new legislation is enacted. We note that the Greater Christchurch Partnership and Canterbury Mayoral Forum are already working towards greater integration of planning work.

Data for decision making

13. We endorse the importance of building robust data for evidence-based decision-making. We cannot adequately manage what we are not measuring, and robust data gathering/management is essential to good resource management. Equally important is a collaborative programme to collect and share data between Environment Canterbury and the districts, and we support your proposals in this area. We also endorse plans for publishing data. There is a great deal of information accessible online, such as datasets behind regional maps, but the information is still not as easily accessible as it could be. Efforts to improve the ease of accessing and understanding the data Environment Canterbury collects and has access to is encouraged and supported.

Water and land portfolio

14. The Council is committed to ensuring a high quality drinking water supply that is safe and sustainable. Improving water quality, including freshwater and stormwater, and strengthening flood protection are critical activities. As we note above, we support evidence-based decision-making and robust processes that give full effect to statutory requirements in this and other areas.

Working together for healthy water and land

15. The draft LTP highlights using the Canterbury Water Management Strategy (CWMS) approach to implement new national directions. We support community-based approaches that prioritise the legislation's intent to protect and improve water, its ecosystems and biodiversity. The recent signing of the Community Waterways Partnership Charter with over 40 signatories exemplifies our collective action and underlines our commitment to improving water quality in urban waterways. We commend Environment Canterbury's support for Zone Water Committees and also Whaka-Ora Healthy Harbour in their endeavours to restore and protect the health of water bodies.
16. We also emphasise the importance of giving effect to the core principle in the 2020 National Policy Statement on Freshwater (NPS – FM) – Te Mana o Te Wai. Giving effect to Te Mana o Te Wai requires a greater focus on te ao Māori alongside robust science and strong compliance monitoring and enforcement. Compliance and monitoring elements of the current Plan appear to focus on meeting CWMS targets, rather than legislative or regulatory requirements such as the NPS – FM. We would welcome clarification of the approach here.

Stewardship of water and land

17. The Council is committed to strengthening relationships with Ngāi Tahu across the takiwā and equally committed to the co-governance arrangements that exist between Ngāi Tahu, the regional council and city council. The Council is committed to the co-governance framework for Te Waihora / Lake Ellesmere that underpins our shared commitment to the restoration of the lake's mauri and ecosystem health. We note that the Te Waihora Joint Officials Group has discussed having explicit funding in long term plans and annual plans for supporting Te Waihora co-governance and improvements in the catchment. As the draft LTP has rolled Te Waihora co-governance and restoration work into a new broad category freshwater resilience, it is difficult to determine the specific funding for this work.
18. We will continue to work closely with you on groundwater monitoring, recognising that Environment Canterbury is responsible for monitoring and safeguarding the general quality of Canterbury groundwater. As you know, our staff perform groundwater chemistry monitoring to better understand

groundwater quality, with water from each aquifer at each pump station site tested as part of a 5-year rolling programme. Exchanges of water quality data take place on a regular basis. We are concerned to see the emerging trend of rising concentrations of nitrates across the district. While the data shows levels are still well below the maximum acceptable level set by the World Health Organisation, this remains a concern for us and a critical issue to address. We would welcome clarification of Environment Canterbury's strategy for addressing this emerging trend and encourage flexibility in responding as we receive more information on the health effects of nitrates in drinking water. Increased monitoring would clearly be required once nitrate levels approach 50% of the maximum acceptable value (MAV), noting that this is based on acute (not long-term) exposure.

19. We note that Environment Canterbury's 2018 LTP foreshadowed a plan change to include the Christchurch-West Melton sub-regional section of the Land and Water Regional Plan in 2022, which was subsequently pushed out to 2023 in the 2019/20 and 2020/21 annual plans. There is no reference to this plan change in the current draft Plan and we would welcome an update on the scheduling of the plan change.
20. Environment Canterbury's Consultation Document seeks feedback on investing in systems like the Hekeao Hinds Managed Aquifer Recharge (MAR) project. The Council strongly supports investment decisions prioritising projects that seek to avoid contamination of waterbodies in the first instance. Investing in systems like MAR is clearly warranted as a means to address existing contamination but we would emphasise the importance of investing in preventing harm in the first place.

Biodiversity and biosecurity portfolio

21. We support Environment Canterbury's biodiversity conservation initiatives (levels of service 13, 15 and 16) and plans to get a better understanding of biodiversity trends in the region. Currently datasets are held by a range of organisations and it can be difficult to get an accurate picture of trends. We note the importance of dryland ecosystems as well as wetlands (LOS 15 refers) given that dryland ecological systems are among the most critically endangered ecosystems in New Zealand and challenging to manage effectively. We would also support inclusion of a level of service mandate for Environment Canterbury to fund (wholly or in partnership with others) acquisition or covenanting of important biodiversity sites. Provision of funding that enables partnership actions is especially important. We note that protection, restoration and regeneration of native planting brings a range of benefits, including fire risk mitigation and climate change resilience.
22. The Council supports Environment Canterbury's efforts to restore the health of waterways throughout our region. Clearly, a significant effort is needed to deliver an environment and water quality that we can all be proud of. An issue that was recently reported in the media was the importance of protecting sites on river beds where birds are nesting. We would encourage Environment Canterbury efforts in this area, to help protect birds when they are at their most vulnerable to human interference, pets and predators.
23. The compartmentalised nature of long-term plans can obscure the connections between actions and the resulting overlapping outcomes or benefits. For example, forest and wetland restoration can be undertaken to maximise a diversity of benefits such as biodiversity restoration, land stability, run-off and water quality, amenity and recreation, climate resilience and carbon storage. We would encourage Environment Canterbury to take a multi-solving approach in its activities to maximise such benefits. Accordingly, we support Environment Canterbury efforts to enable the Pest Free Banks Peninsula movement. Supporting collaborative landscape-scale pest and predator control on Banks Peninsula will deliver significant and far-reaching benefits.

Climate change and community resilience portfolio

24. The Council endorses Environment Canterbury's activity portfolio that brings together climate change and community resilience as a key operational focus for funding, following on from Environment Canterbury's declaration of a climate emergency. As we have all learned from our experiences over the past 10 years, it is only when we - as institutions - work as closely as possible alongside communities, and combine expert advice with local and traditional knowledge, that we can achieve real partnership and resilience to meet the challenges and disruptions ahead.
25. We note the draft Plan as currently presented has a strong focus on adaptation, with not so much emphasis on mitigation efforts and the importance of reducing emissions. The Council supports more explicit reference to the need for reductions in greenhouse gas emissions as a key driver for increased investment in public transport networks. We support the introduction of electric buses as part of the transformational change needed in our transport system in coming decades. Providing accessible and affordable low-emission options will be an important step in ensuring everyone can continue to access opportunities like employment and education.
26. Agricultural greenhouse gas emissions will also increasingly come under scrutiny over the term of this LTP and the Council supports efforts to enable the sector to reduce its emissions.
27. The Council also strongly supports Environment Canterbury's work to regenerate wetlands as a way to support biodiversity and increase carbon sequestration. Increasing native plantings across the region will sequester carbon while providing wider benefits.

Leading community resilience

28. We note there is tension between the Canterbury Regional Policy Statement (CRPS) and Regional Coastal Environment Plan and the New Zealand Coastal Policy Statement (NZCPS) in relation to avoiding increasing risk to coastal hazards. This is a critical area to be addressed in any CRPS update so we can improve regional consistency and provide clearer direction.
29. Under the Resource Management Act, regional policy statements and plans are required to give effect to the NZCPS. The delayed review of the CRPS and lack of uniform regional approach to coastal hazards management has significant implications for several Council work programmes, including the Coastal Hazards Plan Change and Coastal Hazards Adaptation Planning Programme (as well as coastal hazards adaptation projects and plan changes by other local authorities in Canterbury). The implications include, but are not limited to, timing and how local authorities are involved in the review.
30. We welcome the opportunity to work alongside Environment Canterbury officials and to share our evidence and knowledge of coastal hazards management. We also strongly suggest that the issues and options work on the CRPS is progressed now. Despite the delays to the review, the prioritisation of this work will allow the regional planning framework development and Council's current work programmes to better inform each other particularly due to the incongruent timing.

Managing contaminated land, hazardous substances and waste

31. The Council supports plans to adopt a regional approach to the collection and reporting of waste data. Consistently measuring all wastes, including landfills, cleanfills and farm pits throughout Canterbury will assist waste management and resource recovery approaches. Regional approaches to waste minimisation and resource recovery are vital to efficiently and effectively achieve our waste and greenhouse gas emission reduction targets.

Air quality, transport and urban development portfolio

Clean Air

32. We acknowledge Environment Canterbury's regional leadership in addressing air quality issues and the successful action of the community over recent years, in switching to cleaner forms of heating. But we note the continuing importance of working together to address air quality. Trialling of new technology for improved monitoring should continue, and we support additional resourcing to enable better levels of service in responding to public concerns. As we noted in our 2018 Long-Term Plan submission, we support steps to increase turnaround on after-hours complaints and address perceived lack of follow-up on enquiries. We support the steps Environment Canterbury has taken in recent years to improve monitoring of air quality around quarries and we support adequate funding for proactive compliance and enforcement of quarrying activity. We also suggest that Environment Canterbury look at whether it could charge more or a higher proportion of the costs of enforcing consents to consent holders.
33. The Council supports the continuation of Environment Canterbury's Healthy Homes Canterbury service. Encouraging home owners to better insulate and efficiently heat homes provides multiple wellbeing benefits and is well aligned to our COVID-19 recovery and climate change imperatives.

Integrating urban land use and regional transport

34. It is noted that provision has been made for the delivery of a regional spatial plan starting in the 2023/24 year (performance measure 30.3). We understand that this is intended to provide for a regional spatial plan as is currently proposed to be required as part of the resource management reforms. However, the budget funding for all the LOS 30 performance measures appears to be consistently in the order of \$2,000 – 3,000 a year for all 10 years covered by the LTP. This does not appear to provide the funding likely to be necessary for the preparation of a regional spatial plan.

Transforming public transport

35. We support the focus on transforming public transport, and the intent to operate, manage and deliver innovative improvements to public transport services in Canterbury to increase patronage. A low-emission public transport system will also provide options for people to reduce their transportation emissions.
36. The information in the Plan is at a high level, making it difficult to be certain of the extent to which Environment Canterbury will implement the public transport futures business cases over the next decade. It will be vital for Greater Christchurch partners to collaborate to invest in the step change required in the delivery of public transport, as the success of investment by each partner will be dependent on all partners. There is an opportunity to provide a stronger signal in the Plan about the investment and collaboration that will be required over the next ten years.
37. Behaviour change is not directly referenced under "customer marketing and engagement" (page 70). As Greater Christchurch partners work together to improve public transport services and infrastructure, behavioural change initiatives will help to optimise the efficiency of the transport network, providing a relatively low cost-high benefit mechanism to deliver mode shift. The Greater Christchurch Mode Shift Plan 2020 identified a programme of activities for partners to encourage behaviour change to support public transport investment. It would be helpful for the Long Term Plan to clarify the extent to which behaviour change initiatives will form a part of the proposed transformation of public transport services.

38. In response to the Consultation Document question regarding on-demand public transport, more information is needed to assess this proposal, including where Demand Responsive Transport services might be introduced. One factor to consider is the potential for Demand Responsive Transport to enable and encourage low density development, which has a significant ongoing operational cost to service with any kind of public transport, and may significantly limit opportunities to reduce greenhouse gas emissions. An additional factor is the unique challenges our smaller and rural communities face, which could be considered in assessing further trials.
39. Thank you for the opportunity to provide this submission. If you require clarification on any of the points raised in it, please contact Elizabeth Wilson, Acting Team Leader Policy at Elizabeth.Wilson@ccc.govt.nz, in the first instance.

Yours sincerely



Lianne Dalziel

MAYOR OF CHRISTCHURCH

