

12 April 2024

Environment Canterbury
PO Box 345
Christchurch 8140

03 941 8999

53 Hereford Street
Christchurch 8013

PO Box 73013
Christchurch 8154

ccc.govt.nz

Email: haveyoursay@ecan.govt.nz

Christchurch City Council submission on the *Environment Canterbury Long Term Plan 2024-34*

Introduction

1. Christchurch City Council (the Council) welcomes this opportunity to provide a submission on the Environment Canterbury Long Term Plan for 2024-2034. The Council values its collaborative working relationship with Environment Canterbury, at both governance and staff levels, and looks forward to continuing our work together to achieve meaningful outcomes for our community.
2. We note our councils are well aligned with respect to the outcomes we seek from our respective Long-Term Plans. Our Council has set a draft community outcome of being *green and liveable*. This means our neighbourhoods and communities are accessible and well-connected, which supports our goals to reduce emissions, build climate resilience and protect and regenerate the environment, especially our biodiversity, water bodies and tree canopy.
3. As a member of the Greater Christchurch Partnership and Canterbury Mayoral Forum, the Council supports Environment Canterbury's vision of a thriving and resilient Canterbury. We look forward to continuing to work with all our Greater Christchurch and Canterbury regional partners to progress our shared aspirations for our region.
4. Our councils face similar challenges as we plan and budget for the next ten years. We are experiencing challenging economic conditions, including changes to interest rates and inflation, increased project capital costs and higher costs to maintain our assets. There remains significant uncertainty with respect to the details of the change in direction on water services reform, resource management reform and transport priorities, as well as the resulting central government funding available. We both face challenging decisions over the coming weeks.

Climate Resilience

5. Climate change is a shared concern for our councils. We have committed to reducing greenhouse gas emissions across our district, aiming to halve emissions by 2030 and reach net zero greenhouse gas emissions by 2045. We have also set a target for our organisation's activities to be net carbon neutral by 2030.
6. We welcome inclusion of climate change and resilience as a key component of your work programme over the next 10 years. 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. We commend Environment Canterbury's leadership in supporting communities across the region to reduce emissions and adapt to the impacts of a changing climate. We encourage continued collaboration, including through the Canterbury Mayoral Forum, to ensure our response to climate challenges is aligned. We look forward to continuing to work with you on the Canterbury Climate Partnership Plan and other climate-related initiatives.
7. The Council supports Environment Canterbury's commitment to decarbonising the bus fleet and improving public transport accessibility, including with the implementation of the National Ticketing Solution later this year. These

initiatives are crucial for encouraging mode shift and reducing emissions from on-road transport, which was Christchurch's largest single source of emissions for the financial year ended 2023.

Public Transport

8. The Council believes that cities thrive when people can easily move around and have a range of sustainable travel choices available. Increasing the share of travel by public transport in our urban areas has a critical role to creating a more inclusive, accessible, safe, and sustainable transport system. Public Transport (PT) Futures represents a significant step toward increasing the uptake of public transport in Greater Christchurch.
9. As Greater Christchurch partners, we commend your commitment to delivering PT Futures, which will see higher frequency services, realignment of routes and improved routes for our community. PT Futures is a high priority for both our councils, and we strongly support the shared prioritisation in your Long-Term Plan. The delivery of PT Futures is expected to result in reduced congestion, improved air quality and increased accessibility – all of which support our long-term goals for our city.
10. Environment Canterbury has a key role to play in the transformational change needed in the public transport space. We look forward to working with you to deliver the PT Futures business cases that will provide greater access to more services by more people right across the city.
11. The Council is aware of support within our community for increased public transport service and coverage for both our key centres and emerging developments. In due course, we look forward to collaborating with Environment Canterbury as you develop the review of the local and connector services, which will improve the level of service across the whole network.
12. We agree with your concerns around the high level of uncertainty around New Zealand Transport Agency Waka Kotahi funding of PT Futures and note the final shape of central government's priorities will not be confirmed until later in the year. This is a challenge our Council is currently navigating as well. In the instance anticipated funding does not eventuate, we are aware that Greater Christchurch partners would need to review our plans for public transport investment.

Community Resilience

13. The Council values Environment Canterbury's role in enabling and funding the Canterbury Civil Defence Emergency Management Group. This Group does important work in working with communities to improve resiliency across the region. This work is particularly important as we experience increased instances of extreme weather events as a result of climate change. The Council encourages Environment Canterbury to at a minimum maintain the level of investment in Civil Defence and Emergency Management to ensure the Group can continue to respond to events. The Council notes our shared responsibility to deliver and strengthen our region's resilience to climate change impacts – we look forward to further collaboration with Environment Canterbury in the future.

Natural Hazards

14. The Council supports the emphasis placed on local adaptation planning and raising awareness of natural hazards and climate change risks within the Canterbury region and agrees with the commitment to providing resources to raise community and councils' awareness of natural hazards and climate change risks. We note that the current economic environment has put significant pressure on this programme of work.
15. The Council believes that a greater sense of urgency and allocation of funding towards coastal adaptation efforts is necessary and required. With 800km of coastline and a vast marine area, the risks posed by coastal hazards cannot be understated. The Council considers that the proposed allocation of funding is not sufficient to address the significant coastal challenges our region faces. It is imperative that funding better reflects the scale of the issue.

16. The Council recommends increased investment in coastal hazards science to better understand risks. Additionally, we seek clarification on how Environment Canterbury is collaborating with territorial authorities to ensure alignment in adaptation planning. Understanding the adaptation framework, assumptions, and tools being utilised will facilitate effective coordination and action, which is imperative to achieve meaningful outcomes for our region.
17. The Council notes Environment Canterbury's intention to notify amendments to the Canterbury Land and Water Regional Plan by the end of 2024. We urge Environment Canterbury to ensure there is sufficient funding and resources to progress a fast-tracked Plan Change to the Canterbury Land and Water Regional Plan. This amendment is required to allow for stormwater works, which "take and use" groundwater, to progress in affected areas where groundwater is fully allocated or over-allocated, including in the Christchurch district.

Biodiversity Targeted Rate

18. The Council supports increased investment in biodiversity and biosecurity programmes, as well as the emphasis placed on collaboration with multiple agencies, groups, and landowners. Environment Canterbury's biodiversity workstreams are crucial to achieving good environmental outcomes. The provision of funding that enables partnership actions is particularly important. We note that protection, restoration, and regeneration of native planting brings a range of benefits, including fire risk mitigation and climate change resilience.
19. 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. 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.
20. The Council supports the proposed targeted rate for ring-fenced biodiversity projects in Christchurch and Banks Peninsula. This would provide more certainty of funding for key community-led groups and organisations that have a proven track record and established long-term goals for biodiversity. Communities, if well resourced, are often in a strong position to deliver environmental projects. Community-led groups are often well-placed to build and maintain local capacity and to respond, or support a response, to environmental events such as pollution.

Indigenous Biodiversity

21. The Council strongly supports the work Environment Canterbury does to protect, enhance and restore indigenous biodiversity and mahinga kai. We are pleased to see the priority placed on monitoring programmes to understand the current state of biodiversity in the region.
22. The Council commends Environment Canterbury's support for Te Whaka-Ora Healthy Harbour in the endeavour to restore and protect the health of water bodies. Te Whaka-Ora Healthy Harbour plan has been developed by a partnership of our councils, Te Hapū o Ngāti Wheke, Te Rūnanga o Ngāi Tahu and Lyttelton Port Company, and in collaboration with the Whakaraupō Lyttelton Harbour community. This work activates a significant volunteer network around Whakaraupō Lyttelton Harbour and creates important benefits for the community.

Stewardship of Land and Water

23. 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.
24. 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. The recent Drinking Water Quality Assurance Rules now require that source water monitoring is undertaken regularly. This includes

monthly monitoring of nitrate in Christchurch from approximately 40 of our 150 well sources for the city. This will in time provide an improved data set which will be able to closely track any rise in levels. A wider range of chemical determinands are sampled annually.

25. We note Environment Canterbury plans to report annually on the ten-year trend of the concentrations of nitrates in monitored groundwater sites, but we are concerned at the 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 for drinking water, this remains a concern for us and a critical issue to address. We welcome clarification of Environment Canterbury's strategy for addressing this trend and encourage flexibility in responding as we receive more information on the health effects of nitrates in drinking water as well as the effects on waterway health. Increased monitoring would be required should nitrate levels approach 50% of the maximum acceptable value (MAV), noting that this is based on acute (not long-term) exposure, as well as the National Policy Statement for Freshwater Management 2020 (NPS-FM) national bottom line.
26. The Council is concerned at the proposal to reduce funding for the Canterbury Water Management Strategy (CWMS) action plan and would welcome clarification of the implications for the implementation of the CWMS. The Council encourages investment to improve monitoring and reporting to indicate the extent to which water quality targets set by the CWMS are being met. We note that there has not been a significant improvement in water quality in our region in recent years and would welcome an update on Environment Canterbury's approach to improving the health of our region's waterbodies and freshwater ecosystems.
27. Thank you for the opportunity to provide this submission. We reiterate the value we place on our collaborative working relationship with Environment Canterbury and look forward to continuing to work with you to progress positive outcomes for the Canterbury region.
28. For any clarification on points within this submission please contact David Griffiths, Head of Strategic Policy and Resilience (David.Griffiths@ccc.govt.nz).

Yours faithfully



Phil Mauger

Mayor of Christchurch