

## South Canterbury Chamber of Commerce's Submission on the Canterbury Regional Council (Environment Canterbury) Long-Term Plan 2021-31 Te Pae Tawhiti 2021-31

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April 2021

### **Introduction**

**The South Canterbury Chamber of Commerce** is a not for profit membership based service organisation and is the voice of South Canterbury business, serving the community since 1905. With over 515 member businesses in South Canterbury and with a strong national and international Chamber family, we work together to build better business outcomes. We recognise that healthy business cultures lead to the improved wellbeing of all South Cantabrian's.

We provide commentary on Environment Canterbury's Long-Term Plan 2021-2031, based on insights on issues raised by members and wider business community as well as our board's observations and as a result of our longstanding relationship with Environment Canterbury.

We encourage Chamber members to make their own submissions and to inform and deepen the engagement on Deciding what the future of Canterbury looks like.

### **Overview**

In the draft Long-Term Plan consultation document, feedback is invited based on two work delivery options, and two areas of interest.

In general terms we support Option 1, a package of work that includes all the statutorily required work as well as provision to accelerate some of the key initiatives for Canterbury, however with the rates increases proposed we are unable to fully support this direction and comment further later in the submission.

We support keeping My Way by Metro, currently being trialled here in Timaru, however more cost effective and environmentally friendly options need to be trialled.

We are choosing not to comment on the Hekeao Hinds Managed Aquifer Recharge (MAR) environmental infrastructure project as this should be supported or otherwise by those that are most greatly impacted and will have to fund this piece of work.

We recommend that the rates increase in year one is reduced significantly as what is currently proposed are some of the highest increases in the country and are seen as excessive. The explanation for the increases of the costs to implement Governments freshwater package for a big part of the rates increase is questioned. It is understood that this has been budgeted at around \$25m. Rate payers have spent \$60m through the Canterbury Water Management Strategy in the last ten or so years developing a plan to address water quality and quantity issues in Canterbury which has been thoroughly consulted in the community and is backed by solid science.

Expenditure needs to be reduced and a range of options explored, this could be done by actively seeking operational efficiencies or borrowing for operating expenditure to offset

some of the first-year rating impact and removing some of the proposed projects. Fiscal responsibility is vital, especially in the current economic times. The burden of these costs needs to be spread across several years as there will be intergenerational benefits from accelerated activity. This is a particularly challenging year for ratepayers due to the current Covid-19 environment.

Feedback:

1. Canterbury Chair Jenny Hughes' Introduction in the consultation document, concludes "Environment Canterbury is required – by our community and by central government – to not just stop any decline in our environment, but to actively improve it for future generations." Hence doing more than the minimum of what is required.
2. The significant increase in rates that is proposed for year one does need to be revisited and alternative solutions sought as this increase is too much for rate payers to carry.
3. The financial price of increased action must be balanced against the price we will pay as a community if we do not take that action. It is better to invest in action now, rather than waiting till when the financial and environmental cost could be significantly higher.
4. It is also important that currently, we make the most of opportunities to create jobs in the community, and of central Government support available, such as the Covid-19 Response and Recovery Fund, and Jobs for Nature programme.
5. It is essential that we be bold and take action now with urgency to accelerate change for better long-term outcomes for all.
6. In the consultation document, it states that: "In Option 2 there are not the same opportunities to transform public transport through actions such as My-Way on-demand buses in Timaru." The Climate Change Commission draft report states the need for "transformational and lasting change across society and the economy" which included reliable and affordable public and shared transport systems. To play our role in a low-carbon future and to enable equity and access to work, education, and enable positive visitor experiences we do need a public transport network that is affordable, accessible, and attractive. We would like to see more options explored by My Way to reduce costs to rate payers, and more targeted user pay modelling. However, we recognise the need to keep regional New Zealand competitive with our main cities and to keep pace with change and add to the resident and visitor experience. My Way does need to explore further visitor friendly on bus services to encourage greater utilisation.
7. Another difference is the uplift in braided river revival. It is important to invest in protecting the health of the region's waterways, and the natural landscape features that Canterbury is known for. This includes the revival and regeneration of our iconic braided river ecosystems. Restoration could also reduce flooding and the recent cost of emergency services.
8. The investment in the data programmes to continue to build on what data is collected and shared to enable optimal decision-making is also supported to enable an accelerated pace of change.

9. In Option 2 there is a reduced level of support for landowners to assist with compliance and to support implementation of the regulatory framework. This will be important timing-wise for the rural community as they face a number of challenges and will require help to align with government expectations, including the new National Policy Statement for Freshwater Management. The rural sector has been onboard with changes to improve waterways for years, as shown by the last decade of work as part of the Canterbury Land and Water Regional Plan, which had the region's farmers working towards reducing freshwater nitrate levels. The new regulations require further reductions and farmers will require support and the transfer of knowledge to help achieve compliance and implementation of the new framework.
10. In Option 2 there is less provision for environmental education and Enviroschools support. Being able to increase the capacity to the 40+ schools on the waiting list is supported although should this function be delivered by ECAN or the Ministry of Education and the costs therefore become the responsibility of the MoE?
11. In Option 1 there is a contestable fund for community groups for local environmental groups, in our view these funds would be better utilised to reduce the level of increase in the proposed rates rise.

Closing:

Thank you for the opportunity to provide feedback on the 10-year plan and thank you to Justin McLauchlan, Dr Elizabeth McKenzie, and Peter Scott for making the time to discuss this plan with representatives of our Chamber Board. The partnerships that create the foundation of this community must be nurtured.

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**Yes, I am submitting on behalf of an organisation**

**I do not wish to speak to this submission**

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Consultation closes Sunday 11 April 2021.