



26 March 2018

The Chief Executive
Environment Canterbury
PO Box 345
Christchurch 8140

Dear Bill

Timaru District Council Submission to Environment Canterbury Long Term Plan 2018-28

Thank you for the opportunity to comment on the Environment Canterbury Draft Long Term Plan 2018 – 28 as presented through the LTP 2018-28 Consultation Document (CD) and supporting information.

The Timaru District Council does not wish to speak to its submission.

We offer the following specific comments for the Council's consideration:

1) Transport and Urban Development

The Council acknowledges that changes in the funding model for Passenger Transport services in Canterbury are required as the current model is not sustainable.

The Council has considered the options for public transport presented in the Environment Canterbury Consultation Document at a meeting of the Infrastructure Standing Committee on 13 March 2018. We appreciated the presentation from Environment Canterbury officers and opportunity to ask questions.

The Council requests that Environment Canterbury recognise Timaru as different to other urban centres in the region and that the public transport policy and rating reflect this. It is our view that the Timaru bus service is different to the Christchurch service, in that it provides mobility for those who are transport disadvantaged in not having access to alternative private modes of transport.

We consider that any bus fare increase would increase the burden on those who can least afford it and may further reduce patronage. Additional funding should be from targeted rates, not from any increase in bus fares.

We also believe that the proposed reduction in the total mobility subsidy will have a disproportionate effect on people who are most vulnerable in terms of transport options and in remote locations but provide almost no financial saving or benefit. We understand that the total savings generated from this measure will amount to potentially less than \$150 overall for Timaru District. This is based on the 0.51% of trips in Timaru District in 2016/17 that were over \$30, approximately 26 trips in total (26 x \$5 saving = \$130).

As the amount saved is negligible (as it is for the rest of Mid and South Canterbury) we support the mobility subsidy retained at its current level and rates being used to recover any shortfall to support our most vulnerable and disadvantaged residents.

The Council supports a reduction in the Timaru free transfer window. However, it requests a reduction to three hours, rather than the proposed reduction to two hours.

The Council also requests that Environment Canterbury undertakes further investigation and a review of Timaru public transport to develop a model that better suits the Timaru District's needs and that the outcomes are reported back to within six months. It is acknowledged that Environment Canterbury has already initiated a review.

Decisions sought:

- *The Council supports a modified version of Option 2 outlined in the Consultation Document as follows:*
 - *That there be no bus fare increases*
 - *That additional funding for the bus services in Timaru come from a targeted rates increase of 3.64% per annum*
 - *That there be no reduction in the maximum total mobility subsidy*
 - *That the Timaru "free transfer" window be reduced to three hours (not two hours as proposed in the Consultation Document).*
- *That Environment Canterbury report back on a future model for Timaru District's public transport needs within six months.*

2) Freshwater Management

The Council acknowledges the ongoing work in improving freshwater management undertaken by Environment Canterbury and the successes and progress generated through the Canterbury Water Management Strategy and water zone committees. We acknowledge this as one of your core strategic priorities and support the continued work and initiatives of the strategy, and its transition over the next ten years to 'implementation of the planning framework'. We look forward to its continuing success and improvements in measurable outcomes across the district's waterways.

We acknowledge your proposal to change the current region-wide targeted rate for the Canterbury Water Management Strategy to a region-wide general rate for Freshwater Management. We also acknowledge your proposal to establish "targeted rating areas for each water zone, the purpose of which is to enable the funding of activities which are not delivered under the regional programme and which are specific to that geographic area."¹

While we understand the rationale for a zone-based targeted rate, we query its application assuming implementation. Depending on the work required in a particular zone, smaller zone areas like the Orari-Temuka-Opihi-Pareora zone may bear a significant cost in the future. While benefits may accrue to these zones, we question whether a more regionally based approach to this work would be a better approach in light of the fact we are seeking improvements across the region's waterways.

¹ Environment Canterbury Supporting Information for the 2018-28 Long Term Plan, p. 166

3) Hazards, Risk and Resilience

The Council notes the work planned in this space, particularly around flood protection, coastal environmental hazards, climate change, emergency management, hazardous land and waste.

We note various Timaru District flood protection projects are included in the Infrastructure Strategy for the next 30 years, namely:

- Orari – Waihi – Temuka:
 - Milford Drain realignment: 2018/19 - \$150,000
 - Realign Orari stopbank and berm upstream of SH1: 2024/25 - \$300,000
 - Realign Orari stopbank and drainage systems at Opihi mouth: 2029/30 - \$760,000
- Pareora – Provide uniform capacity by increasing at selected sites: 2020/21 - \$150,000
- Seadown drain
 - Retreat and build new stopbank and drain to cater for coastal erosion: 30-yearly - \$550,000
 - Extend pipes 20m inland to cater for coastal erosion 2020/21: \$90,000 - repeated 10-yearly.
- Taitarakihi – investigate culvert upgrade at rail line: 2018/19 - \$5,000
- Opihi River - Scheme review: 2018/19
- Washdyke Creek – floodwall: 2040 - \$100,000

The Council supports this work, but notes its concerns on the following projects:

- Taitarakihi – The \$5,000 allocated for this investigation is, in our view, substantially short of the required funding. We believe \$50,000 is a more realistic figure and seek advice on the funding for this work. Previously for projects of this nature, the costs have been recovered largely from TDC. We believe, as there are multiple stakeholders who will benefit, it is more equitable and appropriate that stakeholder who benefit should contribute to this work. We believe it is also important to signal whether a budget has been allocated for the work that may result from these investigations. Council views this project as a high priority, and strongly supports a solution which is delivered as quickly as possible.
- Saltwater Creek – advice on what if anything has been allocated for projects related to Saltwater Creek
- Washdyke Creek – Floodwall – greater clarity over what this project relates to.

Timaru District Council notes that at this point there appears to be nothing included in the LTP for protection of the Waitarakao/Washdyke Lagoon, such as new flood wall construction should Waitarakao be eroded, and seeks clarity and further advice on this.

Decisions sought:

- *That the budget for the Taitarakihi culvert investigation be increased to \$50,000 and clarity is provide around its funding.*
- *That there is clarity around projects proposed for Saltwater Creek, the Washdyke Creek floodwall and the protection of the Waitarakao/ Washdyke Lagoon*

4) Air Quality

The Council notes ongoing efforts to improve air quality in the Timaru District, particularly in Timaru. We support the proposed 'Healthier Homes Canterbury'

initiative to enable a home heating/insulation loans scheme and ongoing efforts to improve the monitoring of air quality.

Decision sought:

- *That support for the air quality programmes undertaken by Environment Canterbury is noted.*

5) Biodiversity and Biosecurity

The Council acknowledges the increased emphasis Environment Canterbury intends towards a step change in biodiversity management in the future. We support this initiative and look forward to working with Environment Canterbury on projects of mutual interest.

Decision sought:

- *That support for the Biodiversity and Biosecurity programmes undertaken by Environment Canterbury is noted.*

6) Regional Leadership and Collaborative efforts

Timaru District Council acknowledges and values highly the ongoing work of Environment Canterbury to collaborate across the region on a range of initiatives. These collaborative efforts have had benefits including improved project outcomes, enhanced efficiencies, stronger relationships and improved decision-making.

Decision sought:

- *That support for the regional leadership role undertaken by Environment Canterbury is noted.*



Bede Carran
Chief Executive

e. jacky.clarke@timdc.govt.nz
p. 03 687 7258