

## Submission: Environment Canterbury Long Term Plan 2024-2034

I write to you as the manager of BRaid, a charitable trust that advocates for the protection of braided rivers.

Thank you for the opportunity to attend the workshop regarding submission to the LTP 2024-2034. Thank you also for the time and consideration that has gone into the accompanying document summarising the options in an easily digestible format. We have made limited comments as we support most of the draft proposals although not all of the details, and we understand the council is facing fiscal compromises. We have therefore commented only on aspects of these that we feel should be supported, not supported, options that should be reconsidered, and why. We have not commented on Transport as it is outside our mandate.

Nāku iti noa, nā,  
Sonny Whitelaw  
Manager

### Environmental Regulation and Protection (ERP)

#### *Regulatory Framework*

We **SUPPORT** the preferred Option 2.

#### *Authorisation (consenting)*

We **SUPPORT** the preferred Option 2.

#### *Compliance*

We **SUPPORT** the preferred Option 2.

#### *Incidence response*

We **generally SUPPORT** the preferred Option 2, although we would like to see a greater level of response when environmental harm is occurring.

#### *Pest management*

We **SUPPORT** the preferred Option 2.

## **Indigenous Biodiversity and Mahinga Kai**

**We OPPOSE Option 3.**

**We SUPPORT Option 2:** increase in investment in working with communities.

**We SUPPORT Option 2:** targeted rate for Banks Peninsula and Christchurch to support indigenous biodiversity.

**We OPPOSE Option 2:** reduce funding for catchment-based biodiversity programmes, instead, we

**SUPPORT Option 1:** increased investment. This may be through targeted rates for each catchment as per Banks Peninsula and Christchurch. Ultimately, unless there is a rationale for a wider integrated approach, reducing support for catchment-based biodiversity programmes is a false economy with a (literally) negative downstream flow-on effect.

## **Data**

**We OPPOSE Option 3.**

**We SUPPORT Option 1 in favour of OPTION 2.** Data is not a ‘nice to have’. It is essential to the optimal use of limited resources and to redirect those resources where necessary. This is critical in a changing climate as the past is no longer an accurate guide to the future. Phenological changes already underway and entire ecosystems are on the move:

*Changing climatic conditions, including warming, also progressively shift plants and animals to higher latitudes, higher elevations or deeper ocean waters. Approximately half of the many thousands of species studied on land and in the ocean already show corresponding responses, leading to climate-caused local population extinctions and shifts in vegetation zones. In the ocean, marine plants and animals including entire communities have shifted their distributions poleward at an average speed of 59km per decade due to increasing water temperatures. Ocean acidification and decreasing oxygen in the water also play a part. Together all three processes have caused a reorganisation of biodiversity over the past 50 years, especially at the ocean surface. Those species that cannot adjust or move fast enough are at high risk of becoming extinct. – IPCC AR6 WGII, 2022<sup>1</sup>*

## **Local Action Support**

**We SUPPORT Option 1**

**We OPPOSE Options 2 and 3:** that require an overall reduced budget and ‘reduced investment towards community funding’. Investment in community groups is ‘not a nice to have’. It has long been demonstrated that this is critical for implementing and maintaining successful environmental management projects over the long term. By championing their communities, these groups inspire buy-in from local people through thousands of hours of work from unpaid volunteers, generating an emotional investment that cannot be bought through regulation and compliance. Reducing investment in them is likely to compound existing mistrust in ‘top-down’ regulatory entities. Simply put, maintaining at least the same level of funding for community groups will continue to deliver far more value for the wider Waitaha Canterbury community than the dollars invested. Reducing that funding is a false economy.

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<sup>1</sup> IPCC: <https://www.ipcc.ch/report/sixth-assessment-report-working-group-ii/>

## Community Preparedness and Response to Hazards

### *Flood and river resilience*

**We OPPOSE** Option 3.

**We prefer Option 1 'braided river revival strategies'** as delivery of this project sooner rather than later would provide greater flood resilience if it includes giving rivers room, and with them, wetland restoration.

**We prefer Option 2** in terms of prioritises and reducing the number of operational and capital projects for increasing flood resilience, particularly as braided river revival strategies (Option 1) are likely to be more sustainable (across all metrics) over longer periods.

### *Flood warning and advisory service*

**We SUPPORT** Option 2.

### *Data and information on contaminated lands and natural hazards*

**We SUPPORT** Option 2.

### *Civil Defence and Emergency Management*

**We SUPPORT Option 2.** The effects of climate change (increasingly extreme heatwaves, droughts, floods, rising sea levels) and their interaction with non-climatic risk drivers (ecosystem loss and fragmentation, pollution, unsustainable agricultural practices and water management, and social inequalities) threatens food security, public health, critical natural and built infrastructure, and the economy. But these interactions and their consequences are not well understood or communicated, leading to resistance in spending ratepayer money on what may be perceived as 'nice to haves', when they are in fact 'need-to-have' preparations to mitigate the impacts. Suggest that part of increased funding for Civil Defence be directed to helping communities better understand the hazards and compound risks relevant to them, and how they can be mitigated or managed.