

LATE SUBMISSIONS

Officers' Report

2009-19 draft Long Term

Council Community Plan

Late submissions

		L594 LaMori Ltd	<p>Concern about time frame to make his submission. Evaluation: Submitter phoned. He had missed the Living Here and was responding on the basis on a document someone had left in his mailbox later. Recommendation: No change to LTCCP.</p> <p>Tb testing: Support Tb testing and control, other points not clear. Evaluation: Such matters are beyond the scope of the LTCCP and they need to be taken up with the Animal Health Board because they relate to implementing the NPMS for Bovine Tb. Recommendation: No change to LTCCP.</p> <p>Clean Heat project: Concern that NZers don't want to learn about central heating systems installed in Europe, want to spend money on other things. Evaluation: ECan is very aware of the issues the submitter refers to and is trying to educate and advocate for greater energy efficiency. For example, the Clean Heat Project is a voluntary programme that enables and encourages homeowners to replace their open fire and non-complying burners with cleaner forms of heating such as low-emission wood burners, pellet fires, heat pumps, flued gas heaters or flued diesel heaters, as well as insulating the ceiling and underfloor. It is also noted that ECan is proposing to run a Household Energy Efficiency Incentives programme in the draft LTCCP. Recommendation: No change to LTCCP.</p> <p>Water: Concern about poor drinking water on Banks Peninsula. Has written many letters to BPDC and CCC, nothing has been done. Evaluation: Pointed noted. CCC is the correct council to raise these matters with. Recommendation: No change to LTCCP.</p> <p>General criticism based on regional council wasting money and time. Evaluation: Pointed noted. Recommendation: No change to LTCCP.</p>
		L595 David Boyd	<p>No submission point made. Recommendation: No change to LTCCP.</p>
		L596 Nikki Beardseley	<p>Opposes proposed changes to Clean Heat project. More money should be spent on heating houses and landlord support. Scheme should be extended to include all of North Canterbury, as well as Mid and South</p>

		<p>Canterbury.</p> <p>Household energy efficiency incentives for Christchurch should be extended to all of Canterbury. Canterbury could become the showcase for New Zealand with energy efficient homes.</p> <p>Evaluation: The submitter opposes the proposed criteria changes to the full assistance and landlord programmes of Clean Heat. The submitter supports the Household Energy Efficiency Incentives for Christchurch proposal. The submitter seeks that both Clean Heat and the Household Energy Efficiency Incentives programmes extended to the rest of Canterbury as they all have smog problems and every home should be energy efficient, insulated, double-glazed, solar powered and solar water heating.</p> <p>Extending the Clean Heat Project to the rest of Canterbury would be too expensive and the Clean heat project is one tool for those towns where there are rules in place for the removal of open fires or non-complying burners or the airshed is unlikely to meet the National Environmental Standards for Air Quality by 1 September 2013. The rest of Canterbury is able to meet the NES. However, extending the Household Energy Efficiency Incentives to be available to all homeowners across Canterbury is supported in principle as it would provide an alternative option for homeowners to improve insulation and install more efficient forms of home heating at no additional cost to the general ratepayer. The majority of the cost is paid by the homeowner who participates in the programme. However, the administrative costs and the level of funding from Central Government in the 2009 Budget due at the end of May 2009 to pay the subsidy and interest costs of the programme, may make it prohibitive to do this. Council will need to consider the impact of the 2009 Budget announcements to determine what Central Government funding may be provided towards the Household Energy Efficiency Incentives proposal and therefore whether or not to amend the proposal to be available to all households throughout Canterbury.</p> <p>There may also be alternative funding arrangements that ECan can explore further with local partners, providers, EECA and Central Government outside of the LTCCP process that would enable the proposal to be more widely applied.</p> <p>Currently, solar heating is not economically viable to be subsidised through ratepayers' money but ECan is supportive of alternatives to be considered for new and existing homes, and notes that the Energy Efficiency Conservation Authority provides for financial assistance for such heating devices.</p> <p>Recommendation: That the LTCCP be amended to provide for the Household Energy Efficiency Incentives to be available to all households throughout Canterbury. This is subject to the administrative costs and the level of Central Government funding in the 2009 Budget.</p> <p>ECan to explore funding alternatives further with local partners, providers, EECA and Central Government</p>
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		<p>outside of the LTCCP process.</p> <p>Re public transport: There should be light rail for all of Canterbury. Need to get building and make a start now. One engine on a train is cheaper than six buses.</p> <p>Evaluation: ECan's draft LTCCP includes funding to investigate long term public transport options in greater Christchurch, in association with Urban Development Strategy partners. This work includes a current study focussing on north and southwest approaches to the CBD and assessing the levels of demand over the next 35 years and beyond, which will indicate the timing and nature of any changes required to the current public transport system operation. There is currently no evidence to suggest light rail offers any significant advantages over a bus-based system into the future, however investigations will continue to consider future options.</p> <p>Recommendation: No change to LTCCP.</p> <p>Uniform annual charge: opposed. Should keep rates low for those on the lowest incomes.</p> <p>Evaluation: : The submission alludes to the issue that as a flat dollar charge irrespective of circumstance, lower income ratepayers pay a proportionately higher share of their income to meet this charge than a higher income ratepayer. This is a widely acknowledged feature of a UAGC and in principle is relevant. However in absolute terms the overall extra amount of money levied on low value properties will likely be in the order of around \$5 - \$8 per annum.</p> <p>Recommendation: No change to LTCCP.</p>
	L597 M. McCambridge	<p>Opposed to proposed option for funding for Water management Cost Recovery. Supports option 1, continuing with status quo.</p> <p>Evaluation: Submission is opposed to new regime and supports status quo general rate funding.</p> <p>Recommendation: Submission noted.</p>
	L598 Graham Oliver Johnston	<p>Sits on two farmer committees in Southland region. Re Tb programmes, should be both government and urban contributions if they want the monetary benefits from the farming community. Tb funding needs to be effective, not supporting bureaucracy.</p> <p>Evaluation: Tb funding does attract a level of urban funding in Canterbury through a general rate component of 25% of ECan's regional contribution. The Animal Health Board now manages Tb funding and so it is their responsibility to address the other issues raised.</p> <p>Recommendation: No change to the LTCCP.</p> <p>From experience in Southland, considers the LTCCP process is a waste of energy on the part of council</p>

			<p>staff and misuse of ratepayer funding.</p> <p>Evaluation: Councils are required to follow the Local Government Act requirements for long term council planning.</p> <p>Recommendation: No change to LTCCP.</p>
		L599 Eric Buxton	<p>Bovine Tb: Seeks no reduction in funding.</p> <p>Evaluation: The willingness to pay is noted. However, the Animal Health Board has signalled a review of the National Pest Management Strategy for Bovine Tb will take place in the later half of 2009. It is therefore prudent to await the results of that review before committing to a 10-year funding policy.</p> <p>Recommendation: That the level of regional contributions be raised to 10% for the 2009/10 and 2010/11 financial years.</p>
		600 Spokes Canterbury	<p>Draft LTCCP favours funding motorised transport to the detriment of active transport. It commits the bulk of all transport funding to public transport and roading projects in support of motorised travel. Document does not support the active transport emphasis in the Regional Policy Statement, Regional Land Transport Strategy, Canterbury Transportation Regional Implementation Programme, Urban Development Strategy, or draft Greater Christchurch Travel Demand Management Strategy. LTCCP is deficient in implementing ECan's active transport strategies. Would like a separate active transport strategy in funding allocations and for this to represent a significant proportion of the total transport budget.</p> <p>Evaluation: ECan's role in land transport is twofold. Firstly, it is to provide guidance to the region on land transport outcomes sought, via the Regional Land Transport Strategy; and to act on behalf of approved organisations in the region in recommending activities for funding from the National Land Transport Fund, via the Regional Land Transport Programme. ECan's other role is the provider of public transport services across Canterbury. ECan does not fund infrastructure for walking, cycling, public transport or motorists, but we do fund policy work relating to these areas. It is therefore inevitable that the relative scale of funding within ECan's LTCCP between public transport and the regional land transport portfolio activities is so different, because we are the lead agency for public transport, directly funding services; however we only fulfil a policy development and advocating role in wider land transport provision that only involves staff time and some provision to cover the costs of studies. The draft LTCCP identifies over \$640,000 over the next ten years specifically dedicated to the advancement of active transport, which is an unprecedented investment by the regional council in active transport. This is highly aligned with policy documents mentioned, where a long term approach is outlined that reflects a need for moves to a wider range of transport options for moving people and goods. The contents of the RLTS adequately cover the role a regional council can effectively play in advancing active transport. The need for specific active transport strategies sits with network providers,</p>

			<p>who need to interpret regional guidance in the RLTS and articulate this in a local context. A regional active transport strategy would duplicate and complicate local strategies.</p> <p>Recommendation: No change to LTCCP. Recommend that officer's meet with Spokes to clarify the role ECan plays in active transport.</p>
		600 Spokes Canterbury	<p>Over 50% of this LTCCP's funding is allocated to public transport. This is a very expensive option – 3.2% of all trips in Chch are via public transport, 2.4% of trips are by cycle and foot. An emphasis on active transport could effectively limit rate increases – should command a larger share of funded programmes to support and increase these numbers. LTCCP must establish and monitor measures and targets for active transport.</p> <p>Re bike racks – cyclists need to be able to count on their presence, bikes on buses should be part of all bus contract renewals. Secure bike parking at bus stations is also needed.</p> <p>Evaluation: Since ECan's LTCCP does not fund the larger share of active transport provisions, it is not appropriate to make comparisons of PT and active transport funding to the corresponding mode shares. In addition, PT services provide access for longer distance trips and for people where walk and cycle does not meet their needs, so a simple comparison of mode share is not a fair reflection of the service PT provides to the community.</p> <p>The draft LTCCP does not have active transport targets because ECan's role does not deliver the primary means to effect change in this area. A concerted effort has been made in this LTCCP to use measures that reflect our contribution to community outcomes. There will be no strong correlation between ECan's investment in developing active transport policy and any change in the relative use of modes, because local councils have the key role of acting on policy to improve facilities. Conversely, ECan plays a very prominent role in the delivery of public transport, that can effect modal choice, so it does have targets for PT, because these are a good measure of our contribution to the community outcomes it contributes to.</p> <p>Recommendation: No change to LTCCP.</p>
		600 Spokes Canterbury	<p>General concerns about monitoring.</p> <ol style="list-style-type: none"> 1. Disturbed the review of local body district plans will not commence until 10 years after they have been adopted. 2. Needs to clearly state if monitoring re active transport is to occur via the RLTS. <p>Evaluation: 1. The submitter has misinterpreted the draft LTCCP. Work programme 3 – planning and consents refers to an ongoing activity from 2009/10 through 2018/19, that is, an activity that happens all the time. 2. It is implicit that all modes will be monitored in delivering work programme 4 – monitoring.</p> <p>Recommendation: No change to LTCCP.</p>
		600 Spokes	<p>Suggests a number of actions including education and promotion programmes, travel demand management,</p>

	Canterbury	<p>costs benefit analysis for all transportation projects, reviewing of transport projects re active transport, provisions of various programmes to support active transport and integration of active transport programmes.</p> <p>Evaluation: ECan already supports the activities outlined by the submitter in the first three bullets and this will increase over time in supporting the delivery of the greater Christchurch TDM strategy. The manner of calculating cost – benefit for funding purposes is prescribed by the NZTA, however ECan supports greater consideration of public health effects of different strategic choices. ECan is currently seeking funding from the Ministry of health to support a health impact assessment of the current RLTS, and intends to build in health impact considerations into the development of the next RLTS, which is to be developed towards June 2011. The role of assessing project suitability in the general sense lies with the project proposer and the NZTA. ECan has no ability to decline transport projects and would prefer to invest in delivering good transport policy and collaborating with agencies to bring about change, rather than entering into an enforcement/compliance scenario as proposed. It is not ECan’s role or expertise to provide external training, however we do embrace our role in providing cross agency collaboration to advance active and PT goals, as evidenced by the convening and supporting of the Active and Passenger Transport Working Group, the Canterbury Active Transport Forum and the Christchurch and Timaru Passenger Transport Advisory Groups. To our knowledge this is unparalleled in New Zealand.</p> <p>Recommendation: No change to LTCCP.</p>
	L601 Andrew Crossland	<p>Reduce the share of the bovine Tb possum control programme provided by ECan.</p> <p>Evaluation: Supports LTCCP proposal.</p> <p>Recommendation: No change to LTCCP.</p>
	L602 NL and DN Smith Ltd	<p>Water management cost recovery. Opposition is based on the principal costs relating to monitoring a consent are not reliant upon the volume of that consent. Canterbury Regional Council will be double-dipping, charging rates on an increased land value due to irrigation and then wanting to charge for the water applied. We view this proposed charge as a tax rather than a cost recovery mechanism.</p> <p>Evaluation: Submitter asserts that consented volume is not commensurate with investigation and monitoring costs. The cost of investigation and monitoring for a particular project or zone is determined by the amount of work required to undertake the investigation and monitoring, not by the consented volume. For the most part the consented volume is simply used as a means to allocate costs, not to determine the level of those costs. However, it is assumed that the scale and likely environmental effect of consented activities within a zone is likely to be driving the amount of additional work required. The consented volume for groundwater, or average annual consented rate of take for surface water, is then simply used as a means to allocate costs, not to determine the level of costs. In this instance the charges are a mechanism that is linked to the cause</p>

		<p>of the additional investigation and monitoring work required i.e. the cumulative effects of consents to take or discharge</p> <p>Submitter is concerned that ECan will be double dipping by charging via general rate and again for the charges under the proposal. This is not the case as any amount recovered by the proposed mechanism will no longer be funded by the general rate. Those with an increased land value will benefit from the reduction in general rate.</p> <p>Recommendation: No change to the LTCCP</p>
	L603 NL and DN Smith	<p>Water management cost recovery. Opposition is based on the principal costs relating to monitoring a consent are not reliant upon the volume of that consent. Canterbury Regional Council will be double-dipping, charging rates on an increased land value due to irrigation and then wanting to charge for the water applied. We view this proposed charge as a tax rather than a cost recovery mechanism.</p> <p>Evaluation: Submitter asserts that consented volume is not commensurate with investigation and monitoring costs. The cost of investigation and monitoring for a particular project or zone is determined by the amount of work required to undertake the investigation and monitoring, not by the consented volume. For the most part the consented volume is simply used as a means to allocate costs, not to determine the level of those costs. However, it is assumed that the scale and likely environmental effect of consented activities within a zone is likely to be driving the amount of additional work required. The consented volume for groundwater, or average annual consented rate of take for surface water, is then simply used as a means to allocate costs, not to determine the level of costs. In this instance the charges are a mechanism that is linked to the cause of the additional investigation and monitoring work required i.e. the cumulative effects of consents to take or discharge</p> <p>Submitter is concerned that ECan will be double dipping by charging via general rate and again for the charges under the proposal. This is not the case as any amount recovered by the proposed mechanism will no longer be funded by the general rate. Those with an increased land value will benefit from the reduction in general rate.</p> <p>Recommendation: No change to the LTCCP</p>
	L604 Philip Mark Robins	<p>Opposed to proposed option for funding for Water Management Cost Recovery. Support option 1, continue with status quo.</p>

			<p>Evaluation: Submission is opposed to new regime and supports status quo general rate funding.</p> <p>Recommendation: Submission noted.</p>
		L605 AS and JK Newton	<p>Opposed to proposed option for funding for Water Management Cost Recovery. Supports option 1, continuing with status quo.</p> <p>Evaluation: Submission is opposed to new regime and supports status quo general rate funding.</p> <p>Recommendation: Submission noted.</p>
		L606 David G. Trist	<p>No change to pest control funding.</p> <p>Evaluation: Not clear if submitter is supporting pest control funding generally, or, requesting no change to local share of bovine Tb possum control programme.</p> <p>Recommendation: No change to LTCCP.</p>
		L607 E. John Stevens	<p>Opposes reduction in funding for bovine Tb. Retain current situation, make urban areas/rural border areas contribute realistically to overall plan.</p> <p>Evaluation: See What do you think? Summary.</p> <p>Recommendation: No change to LTCCP.</p>