

Submission to Environment Canterbury

Draft Annual Plan 2023/24

3 April 2023



Introduction

The Timaru District Council (Council) thanks Environment Canterbury for the opportunity to submit on the Draft Annual Plan 2023/24 *Mahere ā tau tuhinga tautahi*.

This submission is made by the Timaru District Council, 2 King George Place, Timaru. The contact person for Council is Nigel Bowen, Mayor of the Timaru District, who can be contacted at Timaru District Council, phone (03) 687 7200 or PO Box 522, Timaru 7940.

We do not wish to speak to this submission.

General comments

Council broadly supports Environment Canterbury's Draft Annual Plan 2023/24 *Mahere ā tau tuhinga tautahi*. We note that the draft document is largely consistent with the 2022/23 Annual Plan, with only minor deviations that are not consequential to the Timaru District.

Council supports Environment Canterbury continuing and not reducing its proposed programme of works despite the current, challenging inflationary environment. We acknowledge that this creates – on a percentage basis – sizeable average increases in rates to adjust for the highest inflation in three decades, and that this may cause difficulty for some households. Consequently we encourage Environment Canterbury to exercise careful financial management, and monitor work programmes on an ongoing basis to identify potential efficiencies.

Our support reflects the significant commitment that Council made in our own 2021-31 Long Term Plan to addressing the impact of climate change, most notably through the continued development of our climate change strategy and associated community engagement. Further, the events of the last 12 months – such as Cyclone Gabrielle – continue to highlight the importance of not deferring important climate change measures. We are confident that – when considered over the longer term – it is more beneficial and cost-effective to fund these initiatives now than to not do so.

Notwithstanding this broad support, Council wishes to re-iterate several aspects of our submission on the 2022/23 Draft Annual Plan, and encourage Environment Canterbury to consider their adoption.

Summary of changes sought

- Requests Environment Canterbury review the rating system to permit the discretionary allocation of flood resilience funding to the areas of greatest need and importance, and ensure sufficient funding is available.
- Requests Environment Canterbury prioritise extraction of silt and gravel from riverbeds, particularly in the vicinity of key strategic assets, and reduce risk to the primary sector and community.
- Encourages Environment Canterbury to take a pro-active leadership role in regards to coastal erosion and managed retreat.
- Encourages Environment Canterbury to consider opportunities to expand the *MyWay* public transport model to other areas of the Canterbury region.

Flood resilience and protection

Council continues to support Environment Canterbury's flood recovery efforts. However, this alone is not sufficient to meet Canterbury's future flooding challenges, and a greater focus on flood resilience is required. We note that this also aligns with a key priority of the Canterbury Mayoral Forum.

First, we believe that a key part of the solution is amending the current flood protection targeted rating system – which ring-fences expenditure for the rating district in which it was generated from – to a more general rating mechanism that allows Environment Canterbury to exercise greater discretion over its spending. This will allow funding to be allocated to areas of priority and ameliorate the current situation whereby some vulnerable areas have no flood protection at all. Second, we believe it is appropriate that consideration is given to how other agencies, such as Waka Kotahi, Transpower and KiwiRail, should contribute to flood resilience given the significant benefit that they derive from it. Third, the overall value of the fund needs to be increased to adequately meet the need.

Additionally, Council notes with concern the continued build-up of silt and gravel in key rivers and in the proximity of key infrastructure, such as bridges. The build-up of material increases the likelihood of break-out flooding events as the river has, over time, an increasingly reduced capacity to safely manage volumes of water. Similarly to coastal erosion, river flooding poses a risk to the community and to our economic activity, particularly our primary sector. Therefore, Environment Canterbury should prioritise the extraction of silt and gravel from riverbeds, particularly in areas of strategic importance such as rail bridges, electricity pylons, and State Highway One road bridges, and areas identified as important to preventing threats to the community.

Coastal erosion and managed retreat

Council encourages Environment Canterbury to take a pro-active regional leadership role in regards to the issues of coastal erosion, inundation and managed retreat. Cyclone Gabrielle has brought these threats and future, inevitable challenges into stark relief. Inundation is impacting our primary sector, infrastructure (both Council-owned and community-owned), the environment, and mahinga kai areas.

Further, the Timaru District has a number of vulnerable communities whose future viability is in question, such as the Rangitata Huts South and the Milford Huts. As a Council, we are conscious of the need to be having frank and honest conversations with these communities about these issues.

Simultaneously, we believe that it is important that the Canterbury Region is front-footing these issues collectively to mitigate the risk to affected parties, provide certainty, and ensure good planning and processes. To that end, we envisage an opportunity for Environment Canterbury to take a regional leadership role in this space to guide regional discussion, share best practice and, where possible and desired by local authorities, facilitate co-ordinated approaches.

MyWay public transport model

Council wishes to record its appreciation for Environment Canterbury's continued support of the *MyWay* public transport system in Timaru. We note that *MyWay* has continued to increase its patronage over the past 12 months; this is especially notable as the government's 50% public transport subsidy has not applied to *MyWay*.

MyWay is, in our assessment, a model that is more appropriate for the 21st century and contemporary needs than the traditional approach, and can more effectively facilitate increased public transport usage. Council therefore encourages Environment Canterbury to consider opportunities to expand the *MyWay* model to other areas of the Canterbury region

Conclusion

Thank you again for the opportunity to submit on this Bill. Please do not hesitate to contact us via brendan.madley@timdc.govt.nz if you have any questions or wish to discuss aspects further.

Ngā mihi



Nigel Bowen
Mayor