

1 April 2022

The Chair
Environment Canterbury
PO Box 345
Christchurch 8140

Tēnā koe Chair Hughey,

Timaru District Council Submission to Environment Canterbury Draft Annual Plan 2022/23 Consultation Document *Mahere ā Tau Tuhinga Hei Matapaki*

Thank you for the opportunity to comment on the Environment Canterbury Draft Annual Plan 2022/23 Consultation Document *Mahere ā Tau Tuhinga Hei Matapaki*.

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

We offer the following specific comments for Environment Canterbury's consideration:

1) General comments

Council remains supportive of the direction taken by Environment Canterbury. We endorse the climate change-centric approach of this consultation, particularly in light of the challenges of the past year such as the May/ June 2021 flood event.

Simultaneously, Council is mindful of the real pressures currently being experienced by ratepayers. There are number of causes, including high levels of inflation and – for a number of ratepayers and businesses – the need to undertake direct investment or incur costs to address climate change through adaptation and/or mitigation along with increased expenditure to meet increasing environmental standards. Council therefore welcomes Environment Canterbury's stated intention to defer or diminish expenditure where possible, and encourages this to be an ongoing focus.

2) Amending bus fare structure

Council in principle supports the proposed Option One (targeted fare-free) changes to public transport fares in the Greater Christchurch area. It is acknowledged that Timaru District ratepayers will not be affected by, nor pay for, this proposal.

Nevertheless, we consider that targeted free fares will increase patronage in the Greater Christchurch area for the duration of the trial, reduce greenhouse gas

emissions, and contribute positively to improved public attitudes region-wide towards public transport. In the longer term, the trial offers the potential for the amended bus fare structure to be extended to other areas. We consider that Option One will best achieve the intended outcomes relative to Options Two or Three.

Further, Council reiterates its strong support for the MyWay on-demand public transport service. We would like to take this opportunity to thank Environment Canterbury for their ongoing support of this important service. MyWay has had greater patronage than observed by the previous scheduled bus service, and has improved outcomes for the transport disadvantaged. Council believes that many of the advantages arising from the deployment of MyWay in Timaru will similarly be available and arise by adopting Option One.

We note that MyWay is currently funded until 2023, and that an extension will require a funding partnership between Environment Canterbury and Waka Kotahi. Council recognises that MyWay is a successful initiative, and that other Councils are considering implementing a similar public transport model. We seek to continue to work with Environment Canterbury and Waka Kotahi to make the MyWay service permanent.

Decisions sought:

- *That support for Option One is noted.*
- *That Environment Canterbury continues collaborating with Waka Kotahi to make the Timaru MyWay trial permanent.*

3) Meeting current and future flood recovery costs

Council supports Environment Canterbury's proposal to repay the \$12.2 million costs incurred by the May/ June 2021 flood events via a general rate. This is deemed to be appropriate due to the region-wide nature of the flooding event and is consistent with the principle of intergenerational equity. We understand that the cost to ratepayers will be \$0.67 per \$100,000 of capital value per rating unit per year for 10 years, i.e a household with a capital value of \$500,000 would pay an additional \$3.35 per year, with a slightly reduced rate in year one. Council considers this to be a fair and reasonable way to address the costs.

Additionally, Council signals the significant financial challenge and impact posed by future climate change events without regular and what potentially may be perceived as unsustainable increases in rates. For this reason Council is supportive of Environment Canterbury's efforts to rebuild a general reserve of \$3 million. We also invite Environment Canterbury to consider whether this is sufficient to fund the recovery to future climate change events, given what is forecast to be the likely future frequency and impact of such events.

The May/June 2021 floods highlighted the limitations of the current emergency response funding model split between local, regional and central government. In particular, it highlighted that the current funding model and income ordinarily generated by regional government is not sufficient to meet the costs of flood recovery.

Council therefore supports and values Environment Canterbury's contribution to Civil Defence and Emergency Management in Canterbury and the Canterbury Mayoral Forum in advocating that key central government agencies – such as Waka Kotahi and KiwiRail – should make more significant contributions to emergency response and infrastructure repair, due to the national significance of these assets. Council acknowledges this funding would need to be additional to that made retrospectively by the National Emergency Management Agency (NEMA) after a natural disaster.

Decisions sought:

- *That support for meeting the May/ June 2021 flood recovery costs via a general rate is noted.*
- *That Environment Canterbury continue to collaborate with central, regional and local government to reform the funding model for emergency management and natural disaster response.*

4) Updating flood risk ratings

Council in principle supports Option One to redistribute rates in the Ashburton River/ Hakatere rating district. Option Two – the status quo – is not considered as equitable given the modelling is significantly out-of-date. Council acknowledges that this issue does not affect directly ratepayers within the Timaru District.

Further, as outlined in our April 2021 submission to the Long Term Plan, Council strongly supports Environment Canterbury's programme to update flood modelling throughout the region in light of enhanced mitigation measures, and adjust rates accordingly. Up to date flood modelling and subsequent rate adjustments will better reflect the benefits received from flood protection, and provide more accurate information about the risk to lives, livelihoods and property.

We understand this programme of work is expected to be completed within approximately the next two years. The May/June 2021 flood event highlighted both the necessity of this work, and the priority that it should be accorded. It would be valuable if this modelling work was available to inform future Long Term Plans.

More broadly, we consider that the current river management and flood mitigation funding model is in need of review. This funding is currently ring-fenced for expenditure in the rating district that it was generated from. Some areas are either not rated or too small to generate sufficient rates for the work their area requires.

Decisions sought:

- *That support for Option One is noted.*
- *That Environment Canterbury expedites its efforts to ensure that flood modelling is up-to-date throughout all of the Canterbury region by the Long Term Plan 2024-34.*
- *That river district ratings are accordingly updated to reflect the flood modelling – using the same methodology as for the Ashburton River/ Hakatere rating district –, in time for community consultation in the Long Term Plan 2024-34.*
- *That support to review the river management and flood mitigation funding model is noted.*

5) Closing comments

Council wishes to acknowledge that it values the constructive partnership between itself and Environment Canterbury at both a governance and officer level, particularly in the current challenging operating environment.

Council looks forward to continuing to work closely with Environment Canterbury in 2022/23 and beyond.

Ngā mihi



Nigel Bowen
Mayor