

Christchurch City Council
ATTACHMENTS UNDER SEPARATE COVER

Date: Monday 10 May 2021
Time: 9.30am
Venue: Council Chambers, Civic Offices, 53 Hereford Street,
Christchurch

TABLE OF CONTENTS	PAGE
3 Hearing of Verbal Submissions for the Draft Long Term Plan 2021-2031 - Monday 10 May 2021	
C. Monday 10 May 2021 Volume of Draft Climate Change Strategy Submissions	3

#	SubID	First name	Last name	Comments - Please be as specific as possible to help us understand your views	I'd like to speak
168	39787	John	Gould	Otautahi-Christchurch-Climate-Change-Strategy-25-April-2021.docx	

Ōtautahi Christchurch Climate Change Strategy - draft 2021

Submission from John Gould,

Thank you for the opportunity to submit on the Ōtautahi Christchurch Climate Change Strategy - Draft 2021

Overall I feel the strategy and the broad consultation around its development is an important first step and I applaud all those who have been involved in its development. All that effort will however come to little if the strategy is not fully implemented and backed up by the sought of swift and comprehensive action that a "Climate and Ecological Emergency" deserves. There are numerous opportunities to address both of these urgent issues together and in a holistic manner which obviously I urge the CCC to do.

Below are comments on the four climate goals for Christchurch, and the 10 climate action programmes the CCC believes are needed to achieve these goals.

Goal 1: Net Zero Emissions Christchurch

In my view this needs to be much more ambitious, if the declared "Climate and Ecological Emergency" is not just rhetoric. Look at the way NZ has responded to Covid19 yet in 20 years time like the Pandemic of 1918 that killed 50 million worldwide it will be relegated to the history books. The "Climate and Ecological Emergency" is something far, far more serious. The last time atmospheric CO2 exceeded 400ppm, over 3.5million years ago the sea level was 10-20m higher than today. This is a scientific fact not some piece of "fake news" ...which we ignore at our peril! So

Why not aim for NET Zero GHG emissions by 2035 and a 50% reduction by 2027?

If the CCC were to commit to halve emissions by 2027 then it is clear that transport emissions have to be a prime focus as they currently comprise 54% of total emissions. Therefore Programme 7 should be explicitly prioritised. See suggested strategy under Programme 7 below.

Goal 2: We understand and are preparing for the ongoing impacts of climate change

What the CCC seems not to have fully grasped is that the "Climate and Ecological Emergency" is a global phenomenon ! The strategy seems to ignore the likely impacts of the worldwide disruption that will occur as first millions, then tens of millions and eventually hundreds of millions of climate change refugees are forced to move due to sea level rise, water shortages (as glacial fed rivers like the Ganges and most major rivers in East and South Asia can no longer support irrigation systems on which 2 billion people depend!).

Consider the impact of just a few million refugees on the politics in Europe over the past several years as a tiny taster of what we will likely experience in just a few decades from now. It is not just a few hundred thousand climate refugees from low lying atolls in the Pacific that will be on the move.

As the scale of the crisis is realized the younger generation especially are likely to quickly transition away from diets dominated by meat and dairy products, and avoid non-essential long haul air travel.

Goal 3: We have a just transition to an innovative, low emission economy

This goal if implemented does make a lot of sense.

Goal 4: We are guardians of our natural environment and taonga.

This goal if implemented does make a lot of sense.

It is vital not to forget the huge importance of restoring ecosystems as this will help to avert the “ecological emergency” we are also facing.

The proposal for transitioning from Ōtautahi Christchurch “Garden City” to Ōtautahi Christchurch the world’s first “Urban Eco National Park” suggested by Colin Meurk and others should be given very serious consideration.

Programme 1: Building the foundation

Building the foundation - partnerships and resourcing

Our commitment: Meeting Christchurch's climate challenge will require the support of the whole community/ By harnessing the leadership and resources of Ngāi Tahu Papatipu Rūnanga, organisations, businesses and networks across our city and district, we can develop our response to climate change together.

Next step for the Council: Establish a climate leadership group with key stakeholder representatives to implement the strategy.

This all sounds quite straight-forward when summarized this way, but while society remains trapped in our current “endless growth paradigm” still being promoted and actively supported by numerous council policies and investments, will the challenge of seriously tackling climate change have any chance of success?

Consider the recent extension of the motorways north and south of the city, the Tarras airport plans and the expansion of new satellite settlements like Rolleston and endless rural without any serious consideration to more sustainable transport options. See programme 7 below.

Programme 2: Understanding local effects of climate change

Understanding the local effects of climate change

Our commitment: Climate change affects local communities in different ways. We will gather local data to understand the implications across our district - for our people, our infrastructure, our economy and our environment - and share this information with our communities so we can plan for the future.

Next step for Council: To complete Christchurch's climate change risk assessment, including environmental, social, cultural and economic impacts.

What the CCC seems not to have fully grasped is that the "[Climate and Ecological Emergency](#)" is a [global phenomenon](#)! This programme is fine but the strategy completely ignores the likely impacts of the worldwide disruption that will occur as first millions and eventually hundreds of millions of climate change refugees are forced to move due to sea level rise, super-cyclones, floods, droughts, wild fires, water shortages (as major river systems around the world can no longer support the growing demands from irrigation and the growing number of mega-cities sucking their hinterlands dry!

How many climate refugees is NZ and indeed Christchurch willing to accept in the decades ahead? Hundreds, thousands, tens of thousands! Much broader thinking on all these questions is needed.

Programme 3: Proactive climate planning

Proactive climate planning with communities

Our commitment: Supporting communities to plan for and adapt to future climate change challenges empowers them to use their own knowledge and social networks to take action. Change is an opportunity for innovation, and for our communities to have a say in shaping their future. We will help communities to thrive by identifying our shared values, and the local changes we need to make together.

Next step for Council: Engage with communities to raise awareness of coastal hazards, and seek feedback on the strategic adaptation framework to ensure that it meets the expectations of Christchurch communities and is fit for purpose.

It is good to see the CCC has begun "[climate change education](#)" at some schools, but **why not ALL Schools?**

Indeed, the CCC should urgently launch a climate change education campaign aimed at all communities and every age group. We are all in this together. Although, we all created this mess, about which many of us have been in denial for over 30 years, it is still within our powers to rapidly implement the solutions. We already have most of the knowledge and technology we need, it is mainly the political will and human inertia which are holding us back. Strong and decisive leadership at community, local and national government and global levels are critically needed, like never before.

Programme 4: Adapting and greening infrastructure

Adapting and greening infrastructure systems

Our commitment: Our buildings and infrastructure are increasingly coming under threat due to the impact of climate change. Infrastructure supports our quality of life, and represents one of the biggest investment decisions in Christchurch. We will ensure our infrastructure can cope with the changing climate conditions in the future, while still delivering the services our communities need.

Next step for the Council: Create a series of ponds, wetlands, intertidal habitat and stormwater treatments in Bexley (Ōtākaro Avon River Corridor Regeneration Area), to filter surface water naturally, support biodiversity, enhance flood management and improve amenity.

This all makes good sense.

However, please see my suggestions regard the use of rainwater harvesting and the promotion of water conservation outlined below.

Promote Water Conservation and Rainwater Harvesting

In response to the Programme 4 stated focus areas, it is good to see the phrase “Promote sustainable water use” and great the new developments now require stormwater management through “swales, rain gardens and retention basins”.

As a specialist in rainwater harvesting with over 35 years experience in this field, I would strongly recommend that the council conduct a feasibility study (including cost-benefit analysis) into the potential benefits of introducing rainwater harvesting at household level through the provision of at least one 1m³ (1000 litre) roof tank for every household (or two for larger homes). A \$1000 grant per household to provide the following package might be considered. This would include a tank, its proper installation and some technical advice on, for example, how to ensure the collected rainwater remains safe to drink (in case of earthquakes, floods, fires or other emergencies) through the addition of a leaf slide, floating water intake etc. While such a scheme if introduced over 5 years might cost the council around \$60m per year, it would result in multiple benefits including:

- An emergency water supply for every household for up to 2 weeks
- Water for gardening and essential use during any future water restriction (consider recent difficulties with water supply Auckland has been facing)
- Reduced flooding during big storms as rainwater tanks retain runoff until filled (residents could even be asked to empty their tanks prior to predicted heavy rainfalls).
- Huge savings in reduced stormwater network capacity requirements.
- Research also suggested that the awareness created from individual management of household rainwater supplies instils a water conservation ethic amongst the population at large, resulting in significant financial savings and less energy used to pump water around the network.

There are many precedents for local governments around the world providing subsidies for rainwater tanks, due to the above benefits eg. Osnabruck, Germany provide subsidies of between US\$600 – 1200, as long ago as the early 1990s.

I would be more than happy to meet with CCC staff and discuss these opportunities (as a voluntary contribution to addressing the "Climate and Ecological Emergency" if invited to do so – contact:- johnegould@gmail.com

Programme 5: Carbon removal and restoration

Carbon removal and natural restoration

Our commitment: Our biodiversity and ecosystems will be increasingly threatened by climate change. By protecting and expanding natural areas in our district, we will help capture carbon dioxide, while benefiting natural ecosystems and biodiversity.

Next step for the Council: Identify sites where partnership opportunities could increase indigenous planting across Christchurch and Banks Peninsula.

In my view this is one of the best sections, but could go further and help benefit efforts around carbon sequestration at a national and even international level.

In the Hinewai Reserve near Akaroa, CCC has a perfect example of what should be happening throughout NZ and indeed the world. Hugh Wilson's 30+ year "experiment" has proven beyond doubt that nature is potentially our greatest ally when it come to restoring and regenerating the native forest which only a few centuries ago covered 80% of NZ. If only a fraction of this could be re-established, this would surely go a long way to hitting the target of becoming "a net zero GHG emissions" council long before 2045 and ideally before 2035.

A 30 minute documentary about the Hinewai Project can be found and viewed free on YouTube search for "Fools and Dreamers" – this should (in my view) be required viewing for every child (and adult??) in Aotearoa.

Once armed with the evidence of what is possible if nature is gently assisted in reasserting her control of marginal uplands, CCC should vigorously lobby central government to promote the conversion of unprofitable high country grazing land into a valuable asset through carbon farming. As the price of sequestering carbon goes up, as it surely inevitably will, the benefits to the landowner (preferably DOC or local communities) will also go up.

CCC should invite Jacinda Ardern and relevant Ministers, James Shaw etc. to visit Hinewai and listen to its story direct from the mouth of its architect Dr Hugh Wilson.

Programme 6: Economic transformation and innovation

Economic transformation and innovation

Our commitment: To reach our goal of net zero greenhouse gas emissions, we need innovative climate solutions and an economic transformation to move away from resource intensive, high emission industries.

Next step for the Council: Work with ChristchurchNZ, the Canterbury Employers' Chamber of Commerce and other stakeholders to deliver a series of events and activities to highlight and drive climate innovation in Christchurch.

CCC needs to urgently review its investment and interest in the development of a new International Airport in Tarras. This development runs completely counter to the Climate Change Strategy being proposed and makes a mockery out of the CCC declaration in 2019 of a "Climate and Ecological Emergency".

The mayor recently told the School Strike 4 Climate protesters, in response to a question on Tarras Airport, that it is the responsibility of the "Airlines to Decarbonize". Is that why CCC recently supported the display of a small electric plane with a range of a few hundred kms in Turanga library. Is the CCC really under the illusion that there will be long-haul flights to Europe, Asia and N.America in hydrogen fuelled or electric planes before 2035? While technology can sometimes move fast eg. from the first powered flight (Richard Pease NZ 1903 to the Moon just 66 years later) ... we haven't managed to get back to the Moon in 50 years and the history of Concorde is a reminder that technological leaps are intermittent.

What message does this send to our children and grandchildren? Which planet are you on? Clearly not this one! ... "Planet Madness" perhaps?

Programme 7: Low-emission transport system

Low-emission transport system

Our commitment: Road transport is the biggest single contributor to Christchurch's emission footprint. The transport sector contributes 54 per cent of our district's greenhouse gas emissions, with 36 per cent coming from road transport. Reducing transport emissions is essential to achieve our greenhouse gas emissions targets. Christchurch has high levels of private car use and low level use of public transport.

Next step for the Council: Complete the Christchurch Transport Plan to understand pathways to reduce emissions and identify a progressive series of options to achieve the level of reductions we are seeking.

If the CCC was to commit to halve emissions by 2027 then it is clear that transport emissions have to be a prime focus as they currently comprise 54% of total emissions. Therefore Programme 7 should be explicitly prioritised.

Rapid reductions in transport could be achieved virtually overnight by encouraging:

- Carpooling through introducing carpooling lanes during rush hour as they do in Auckland with T2 and T3 lanes.
- Encourage buses to run full not empty with \$1 everywhere fares (or free buses for all) – especially the under 25s.
- Encourage more active transport walking, cycling, scooters and ebikes.
- Light rail to Rolleston etc.
- More EV charging opportunities.
- Cycling training for ALL school children

Programme 8: Energy efficient homes and buildings

Energy efficient homes and buildings

Our commitment: Our homes, buildings, businesses and infrastructure consume large amounts of resources such as energy, water and materials to build, operate, maintain, repair and replace.

We will design our homes, businesses, buildings and infrastructure to be more energy and resource efficient, and powered by affordable, renewable energy. This will lower emissions, reduce costs, deliver healthier buildings, create businesses that are more efficient and conserve our precious resources.

Next step for the Council: Promote awareness of resources available to communities and businesses to assist with energy efficiency efforts.

This all makes good sense, we just need to go further and faster, given the emergency we are facing.

Please note my suggestions regard the use of rainwater harvesting and the promotion of water conservation outlined under Programme 4 above.

Programme 9: Towards zero waste

Towards zero waste

Our commitment: Generally, our society buys things, uses them, then throws them away. About 9 per cent of Christchurch's greenhouse gas emissions come from our waste. However, approximately 40 per cent of waste currently going to landfill in Christchurch has the potential to be recycled or composted, using the services currently available.

Next step for the Council: Implement the Council's Waste Management and Minimisation Plan.

Some of this makes good sense, we just need to go further and faster, given the emergency we are facing.

CCC needs to mount a campaign to ban organic matter from Red bins completely and offer an alternative means of disposing of meat and waste food, much of which could be composed in back gardens or newly developed community composting facilities.

Programme 10: Sustainable food system

Sustainable food system

Our commitment: the production, distribution, consumption and disposal of food generates significant greenhouse gas emissions. we will support sustainable food production to improve people's health and wellbeing, while restoring the natural environment.

Next step for the Council: Support the planting for 500 fruit trees in schools and community locations in Christchurch.

Some of this makes good sense, we just need to go further and faster, given the emergency we are facing.

CCC should launch major campaigns to :

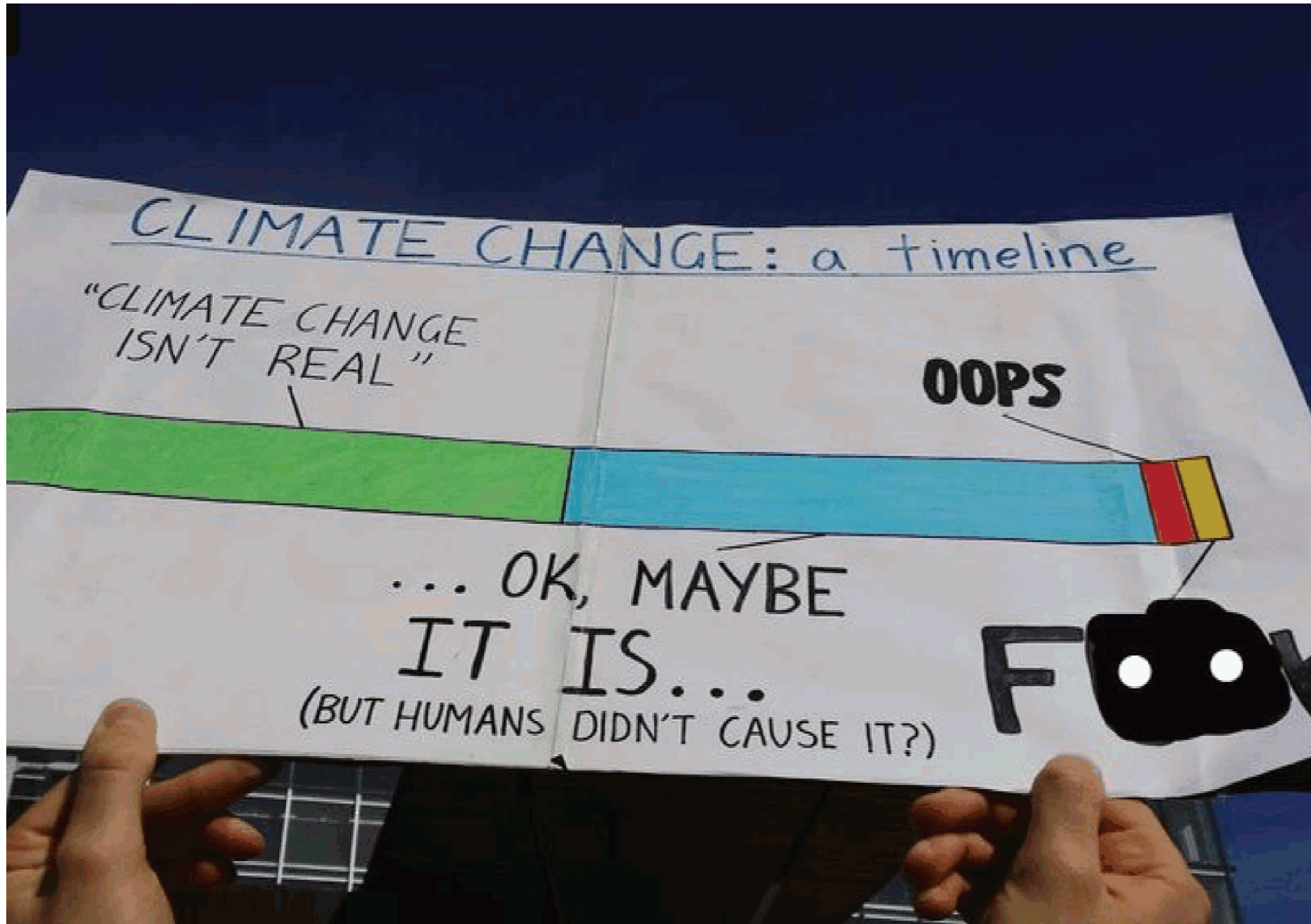
1. encourage more fruit and vegetables to be grown in back yards, increasing this from 59% to 90% in 3 years, by supporting households by giving away seedlings for veges and fruit trees.
2. Reduce food waste along the "Love Food, Hate Waste" theme.

#	SubID	First name	Last name	Comments - Please be as specific as possible to help us understand your views	I'd like to speak
146	39743	Caroline	Syddall	<p>Introduction. We're talking about a climate emergency and need for urgent action here. While I support the recommendations of this document overall I feel they are generally too vague, too much out in the future and too lacking in short-term actions. It does not feel like a document for urgent action to address an existing emergency. I feel as though on the timeline from the attached School Strike for Climate Action poster, the proposals in the Council's document are a response as if we are back in the green (though not actually in denial) whereas in reality we are up in the red and genuinely on the verge of the yellow. We need decisive action now!</p> <p>I absolutely support partnership with Ngai Tahu in all steps of this strategy. I have largely not listed this in each section as I take it as a given and assume that CCC does to. Does CCC have something like Ecan's Tuia partnership that ensures that Ngai Tahu is 'at the table' for all discussions?</p> <p>I support the four goals.</p> <p>1. Net zero emissions. With transport contributing to 54% of emissions, I believe the focus must be on transport and city infrastructure more than in building materials and methods. I would like to see the Council focus on city planning that creates a walkable city where people can access the bulk of the services they need by foot, bicycle or public transport, and where people feel safe doing this. I support more slow areas that reclaim neighbourhoods from cars, I urge the Council to extend the cycle network to your earlier shorter timeframe. We need to be brave and re-shape our city to make driving less convenient and walking, cycling and public transport more convenient and affordable. Electric cars are an improvement in terms of emissions but they are not a sustainable long term solution (and they do not improve the walkability and livability of neighbourhoods or cities). We must make these changes over the next few years not the next couple of decades. I would like to see the City Council work more closely with Ecan to improve the public transport system, including investigating the reintroduction of a free inner-city bus. The other signs of success listed under this action are too much focussed on talk and too little on action, we need these things but we need them now so that the practical changes happen in the near future. I fear that although the Council has declared a climate emergency you are not acting with the urgency required to respond to this emergency.</p> <p>Goal 2. Prepared for the impacts of climate change. Surely 2 years after the Council declared and climate emergency and nearly 30 years since the issue began to get attention in New Zealand, much of the knowledge relating to Christchurch must be recorded and the Council must have planning underway. If not, then the Council needs to get a high-powered</p>	Yes

				<p>group to pull together existing research and develop plans then the Council needs to act on these quickly. The Council needs to show leadership, to be brave and to act. Again, the signs of success in this section are about consultation and planning, at this time we need success to include completed actions. The climate emergency isn't on the way, it's here.</p> <p>3. A just transition to a low-emission economy. Some of this should come out of the actions the Council has taken elsewhere, both through changes to Council jobs and to the opportunities created by a city that is re-shaped to enable people to access services locally. I would like to see the Council listen to and support small businesses, after the quakes we saw Central government stifle small businesses and enable big-business to make decision affecting local citizens, we must have a citizen and small-business led transition to a low carbon economy.</p> <p>Strong communities. The Council needs to support existing community groups and see them as partners to a better future. From those providing social and community services to those planting reserves, the Council needs to develop a partnership model which is little in evidence at present.</p> <p>Goal 4. Guardians of our natural environment and taonga. This is a clear area where Council needs to work with existing voluntary organisation as well as supporting new ones ("supporting our kaitiaki"). Council will never have the resources to do all the work required to protect and enhance our natural environment, it needs to see itself as supporting a team of citizens. I strongly support the restoration of ecosystems and green spaces, both for climate reasons and for quality of life. We need a liveable city for people and insects/birds etc. I fear we are on the verge of an ecosystem crash (how many ladybirds did you see this summer/autumn; what sort of diversity of butterflies/moths have you seen lately?) and ecosystem maintenance and re-creation is vital.</p> <p>Programme 1. Partnerships and Resourcing. Absolutely support partnership with Ngai Tahu. Suggest you get the Climate Leadership Group set up pronto and get on with the actions. As above, make sure this involves community groups and small business.</p> <p>Programme. Understanding local effects. Strongly support completing this assessment. Suggest getting one of your researchers or librarians onto checking what has already been done outside of the work the City Council, NIWA, Ngai Tahu. I am very surprised that ECan is not mentioned here, they must have done research that will be of use to the City Council. If you're not already working closely together then I suggest putting the effort into building a close, constructive relationship with them.</p> <p>3. Climate Planning with communities. Strongly support climate education in schools- another place to partner with Ecan and Enviroschools. Support all the areas you're proposing to look at here, they are all serious, mostly already existing</p>	
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				<p>issues. Coastal hazards and seawater inundation are issues that will rapidly follow the existing flooding hazards to be major problems. We need to address the question of managed retreat and be a Council that it prepared to talk about the options openly. The 'strategic adaptation framework' is going to be a very important document that needs to be out and talked about as soon as possible.</p> <p>4. Infrastructure systems. Support everything suggested here. Would also like to see the Council actively support householders to collect rainwater and possibly grey water, and strengthen messages about reducing water use and waste. To me though the big infrastructure issue is creating accessible, liveable communities to reduce car transport and enable people to support each other in their neighbourhoods. This would fit well with the proposed swales, rain gardens and tree planting- it's about reshaping our neighbourhoods and city. I support your plan for Bexley but we need a plan for the whole city (or better still a series of plans for areas within it).</p> <p>5. Carbon removal and natural restoration. Support everything here. Work on strengthening and building partnerships with existing community groups as well as building new partnerships.</p> <p>6. Economic transformation. I support your focus areas but the next step of working with ChristchurchNZ and the Chamber of Commerce does not make it sound like you're ready to talk to small businesses and community groups. It's these on-the-ground groups that are likely to bring about fast change- think of small, eco-friendly businesses popping up around the city, enabling people to access services and employment without the need to travel far, think of small businesses that can adapt quickly and that have a reason to listen to their customers and communities, think of community groups that understand their communities and can organise volunteers- I believe that this is what can transform Christchurch, not groups that represent the power groups of the past. I've just looked at the board of ChChNZ- all white, few of them seeming to have much in common with the average ChCh citizen and the senior leadership team doesn't seem much different. I do not believe that these are the people that are going to support the transformation we need for a low carbon future.</p> <p>8. Energy efficient homes and buildings. All good ideas. I particularly support promoting energy efficiency more strongly. Sometimes it feels like the Council is scared to stand up and say what it believes in. Talk about it more and help normalise energy efficiency.</p> <p>9. Towards Zero Waste. We've clearly got a heck of a long way to go here! Showing leadership is definitely needed. Promote a 'repairing economy' as well as a 'sharing economy'. Avoid future mistakes like allowing rubbish to go into yellow bins during lockdown, honestly, what were you thinking. Stick more info on recycling onto recycling bins- it shocks me to see what people put in their yellow bins, I assume that their excuse is ignorance- remove this excuse.</p>	
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				<p>10. Sustainable food system. All good stuff. The next step of planting 500 fruit trees is a pretty small step. I don't know if it's CCC or Ecan that is responsible for land zoning, but we need to stop expansion across horticultural land now. This was being talked about by a soil science lecturer at Lincoln 50 years ago. Post peak oil it will be vital to have access to food grown locally. Production in home and community gardens and parks is great but it's commercial production that will feed the people. We need to urgently identify the areas that we cannot afford to allow expansion into.</p> <p>Good ideas in here, move past the talking promptly and take brave, decisive action.</p>	
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#	SubID	First name	Last name	Name of organisation	Your role within organisation	Comments - Please be as specific as possible to help us understand your views	I'd like to speak
157	39767	Penny	Carnaby	Banks Peninsula Conservation Trust	Chairperson	Please see attachment	Yes



Christchurch City Council

Ōtautahi Christchurch Draft Climate Change Strategy

April 2021

Submission by **Banks Peninsula Conservation Trust**

Contact details:

Penny Carnaby

Chairperson

Banks Peninsula Conservation Trust

We wish to be heard in support of this submission.

1. Overview

The Banks Peninsula Conservation Trust (BPCT) congratulates the Council on declaring a Climate and Ecological emergency in 2019. We acknowledge and agree with the urgency signalled in the Strategy and encourage the Council to act decisively. We see the Ōtautahi Climate Change Strategy (CCS) as an opportunity for the Council to showcase the landscape and unique biodiversity of Banks Peninsula including the Port Hills. We hope CCC will draw inspiration from the Banks Peninsula ecological restoration story and use this as an exemplar showing how, by working together, we can protect land, water, and soils, let the natural regeneration of native vegetation increase, and by doing so accelerate the sequestration of carbon.

We see the CCS as a vehicle with the potential to leverage and celebrate all the aligned activities of those who are working so hard to encourage the recovery and regeneration of the distinctive flora and fauna of Banks Peninsula. Those alliances include Ngai Tahu parties, private landowners, agencies CCC/ECAN/DOC and other aligned organisations and Trusts. The BPCT passionately believes that by working together we can achieve more for the environment than we can by working on our own.

1.1 BPCT agrees with:

- The target set of achieving net zero greenhouse emission by 2045 (excluding methane) and to halve our emissions by 2030
- The underpinning structure of the Strategy with the four Climate Goals supported by 10 Action programmes outlining what we must do to achieve these goals.
- Positioning the Strategy as the overarching framework with which all Council activities including the LTP 2021-2031 budget must align.

1.2 Areas of concern:

While we understand the CCS is intended to be the overarching framework from which all CCC activities will align, we are not yet seeing this demonstrated in the draft LTP 2021-31 and this is a matter of concern.

We are particularly concerned to see proposed cutbacks to the biodiversity fund, the operational MOU for BPCT and funding for the Pest Free Banks Peninsula project signalled in the LTP 2021-31. There appears to be a disconnect between the aspirations outlined in the CCS and the funding means to deliver them.

The Trust's core work is in helping landowners to recognise, foster and protect the ecological values on their land. This includes protecting waterways and wetlands, restoring, and regenerating native vegetation across all habitats, and supporting pest control. All these activities make a positive contribution to the Climate Change Strategy. We futureproof these gains for future generations through legal covenant protection.

1.3 Opportunities: *"Achieving our goals together"* pg 17

The Trust supports CCC on the way they have structured the CCS around 4 Goals and 10 Programmes, and particularly aligns its activities with:

Goal 4 ***"We are guardians of our natural environment and Taonga"*** CCS p. 16

Programme 1: ***Building the foundation – partnerships and resourcing*** p. 18

Programme 5: ***Carbon removal and natural restoration***

In relation to Goal 4 and Programmes 1 and 5, the Trust acknowledges and supports submissions presented by the Rod Donald Banks Peninsula Trust and Federated Farmers of New Zealand. There is considerable agreement between us all on these sections of the CCS.

We are also strongly support the desire of CCC to build partnerships and work together with aligned organisations and communities to deliver the 10 programmes outlined.

One of the signatures of the Trust's work is our ability to facilitate and lead collaborations across agencies (CCC, ECAN, DOC), runanga, aligned organisations, landowners, and communities, all who are passionate about working together on projects which benefit the natural environment, protect natural ecosystems, and enhance biodiversity values on Banks Peninsula. We can achieve much more by working together.

We strongly recommend the CCC works with BPCT to leverage and expand on these existing collaborations including:

- **The 2050 Ecological Vision for Banks Peninsula** www.bpct.org.nz/bpct-2050-ecological-vision which brings together a range of aligned organisations and agencies (CCC/ECAN/DOC) and landowners to support the eight Ecological Goals set out in this Vision. The Vision delivers an aligned, joined up voice for all the outstanding activities and projects which enhance and restore the unique indigenous biodiversity of Banks Peninsula.
- **Ecosystem restoration** <https://www.bpct.org.nz/our-projects> Supporting private landowners to protect and enhance high-value indigenous biodiversity through establishment and ongoing ecological management support for conservation covenants, as well as a range of community education programmes on biodiversity enhancement and protection.
- **Te Kākahu Kahukura** <https://www.tekakahu.org.nz/> is a landscape scale project on the Southern Port Hills to restore a thriving and resilient indigenous forest supporting an abundance of native birds and invertebrates. This taonga for Otautahi is being realised through a BPCT-led collaboration of landowners, residents, not-for-profit organisations, Ngati Wheke, and the agencies (CCC/ECAN/DOC/SDC)
- **Pest Free Banks Peninsula** <https://pestfreebankspeninsula.org.nz> This is a collaborative programme involving 14 partner organisations, targeted to protect and enhance biodiversity on the Peninsula through the widespread removal of animal pests. Involving CCC/ECAN/DOC, iwi, aligned organisations, and landowners on Banks Peninsula. This will increase carbon storage by removing key impediments to natural regeneration.
- **The Wildside Project** <https://www.bpct.org.nz/our-projects?id=30> The Wildside Project is a large-scale collaboration of landowners, Christchurch City Council, Department of Conservation, Environment Canterbury, and BPCT for the protection of a variety of endemic, threatened, and iconic species. The Wildside covers 13,500ha and focuses on habitat protection, with 25% of the Wildside held in private or public reserve.

2. Working Together to deliver the goals and programmes outlined through collaboration and partnership

Goal 4: *We are guardians of our natural environment and Taonga CCS p. 16*

Programme 1: *Building the foundation – partnerships and resourcing CCS p. 18*

About the Trust

The Banks Peninsula Conservation Trust was formed in 2001. We have just celebrated our twentieth birthday. The Trust is a non-profit charitable organisation that works with landowners, agencies, runanga, sponsors, and the wider community to promote the conservation and enhancement of indigenous biodiversity and sustainable land management on Banks Peninsula.

The Trust was formed as a community-driven organisation to facilitate the protection of biodiversity on private land using voluntary methods. This was following a mediated settlement of land-owner appeals to the Environment Court regarding the then Banks Peninsula District Council's decisions to impose rules about biodiversity protection on private land. In 2003 the Minister of Conservation granted BPCT covenanting authority status under Section 77(1) of the Reserves Act 1997, making the Trust the first, and we understand still the only, non-government organisation to place covenants on to land titles since the QEII National Trust began 40 years ago.

Recognised nationally by the Ministry for the Environment and Department of Conservation with the 2017 Green Ribbon Award for Community Leadership, and with a national award for Community-led Biosecurity from the Ministry for Primary Industries, the Trust is known as a highly successful community-driven conservation organisation and a leader in biodiversity protection.

The wide-spread community support for our conservation efforts is the result of: (a) working with landowners in a non-challenging and empowering way through voluntary protection methods; and (b) operating in a collaborative way that engages the community and provides the linkages between community aspirations for biodiversity protection and enhancement, partnership and funding support from the corporate sector, and the local authorities and agencies with a mandate for conservation work.

The Trust has a reputation for taking a strategic approach to biodiversity management and protection and is recognised as being efficient and effective with the resources available. The biodiversity outcomes able to be achieved by the Trust, working in partnership with CCC, ECAN and other Trusts, agencies, organisations and landowners, are limited by the available funds.

2050 Ecological Vision for Banks Peninsula (including the Port Hills)

In 2017 BPCT led the development of, and launched, the Banks Peninsula/Te Pātaka o Rākaihautū (including the Port Hills) Ecological Vision 2050 www.bpct.org.nz/bpct-2050-ecological-vision. A range of organisations and agencies (including CCC) work together to support **eight Ecological Goals** set out in this Vision. The eight Goals are aspirational but achievable and are being used to guide ecological restoration work to result in a substantial improvement in the state of indigenous biodiversity on Banks Peninsula/Te Pātaka o Rākaihautū by 2050. The Goals build on and seek to implement Environment Canterbury's Regional Biodiversity Strategy (2008), the Christchurch City Council's Biodiversity Strategy 2008 – 2035, the Mahaanui Iwi Management Plan 2013, and the Banks Peninsula Zone Implementation Plan (2013).

All 8 Goals are interrelated and together contribute a significant improvement in the protection and enhancement of indigenous terrestrial, freshwater, and marine biodiversity on Banks Peninsula that align with the biodiversity priorities outlined in Draft Climate Change Strategy and Long-term Plan

The 8 Goals

Goal 1: All old growth remnants (more than 1ha in area) of Banks Peninsula Forest are protected and appropriately managed.

Goal 2: Rare ecosystems are protected and appropriately managed.

Goal 3: The connections between land, freshwater and marine habitats are managed to support viable populations of species that depend on them.

Goal 4: Four core indigenous forest areas of more than 1000ha each have been protected.

Goal 5: Land and freshwater primarily used for production and for settlement also supports thriving indigenous biodiversity.

Goal 6: Rare and common indigenous flora and fauna of Banks Peninsula are increasingly abundant.

Goal 7: At least 2 locally extinct species have been reintroduced.

Goal 8: Banks Peninsula is effectively free of pests.

2.1 Delivering the 2050 Ecological Vision

The BPCT aligns all of its activities to delivering the 8 goals in the 2050 Ecological Vision including:

Habitat Protection Progress

- The Trust's habitat protection programme is contributing towards achieving these goals. This programme has a long history of working with landowners to protect and enhance biodiversity through a range of voluntary protection mechanisms. The most powerful of these is a **perpetual conservation covenant** that requires current and future landowners to manage the covenant for conservation purposes.
- A well-managed covenant results in high value biodiversity being not only protected but enhanced. Indigenous habitat quality quickly improves on the exclusion of stock, weed and animal pests are reduced with good management, and soil and water quality are improved. A conservation covenant is a priceless gift by current landowners to future generations. We currently have 89 covenants in place protecting over 1500ha, and a full programme of new covenanting projects in progress. Landowner demand for the Trust's support is high, and our rate of progress towards achieving these habitat protection and enhancement goals is limited by the shortage of funds available to carry out this work.

Te Kākahu Kahukura

Te Kākahu Kahukura particularly supports Goal 4 which is to protect four core areas of indigenous forest of more than 1000 ha each and is included as a priority area for control in the Pest Free Banks Peninsula Strategy.

This is a voluntary landowner and community initiative. It includes private land owners, agencies councils and aligned organisations. It aims to facilitate and co-ordinate native forest revegetation and restoration on the Southern Port Hills. Around the core area of regenerating forest, landowners are encouraged to plant native trees and carry out pest control in a way that supports a thriving indigenous forest plant community and allows native birds and other native fauna to move through the landscape.

The Wildside

The Wildside Project is a large-scale collaboration of landowners, Christchurch City Council, Department of Conservation, Environment Canterbury, and BPCT for the protection of a variety of endemic, threatened, and iconic species.

The project began for the protection of breeding sites of pelagic bird species such as the endemic white-flipped little blue penguin, the only titi (sooty shearwater) colony in Canterbury, and yellow-eyed penguin at their northern breeding range. The Wildside has also been recognised internationally in the IUCN Invertebrate Red Data Book (1983) for a place of high invertebrate endemism. Other iconic and threatened species outcomes include the protection of jewelled gecko, spotted skink, the Banks Peninsula tree weta and Akaroa daisy (both found only on the Wildside).

The Wildside is a nationally significant area for the protection of seabird breeding. There are two marine reserves, Pohatu and the Akaroa Marine Reserves. The largest penguin colony on mainland New Zealand is at at Pohatu Flea Bay.

The Wildside covers 13,500ha and focuses on habitat protection, **with 25% of the Wildside held in private or public reserve.**

Pest Free Banks Peninsula

In November 2018, the Council was one of 14 foundation signatories to the Pest Free Banks Peninsula / Te Pātaka o Rākaihautū Memorandum of Understanding. This formalised the community led programme to protect and enhance biodiversity on the Peninsula through the widespread eradication of animal pests.

Substantial progress has been made on this project which supports Goal 8. With funding support from the Department of Conservation and Environment Canterbury, we now have a \$10M, 5-year programme, employing 13 staff and targeting eradication programmes for Kaitorete and the Extended Wildside (20,000ha on the south-eastern Banks Peninsula). These are the first areas in a progressive programme to eradicate animal pests, such as possums, rats, stoats and feral cats from the Peninsula. Alongside this there is a programme to remove feral goats from the Peninsula and a substantial work programme to engage with households and community-based groups for local trapping programmes.

For the last two years, the Council has helped the community-based predator control programmes around the Port Hills and adjacent areas. The \$60,000 provided for each of the last two years has enabled substantial progress towards our goals and supported animal pest control in the Te Kāhahu Kahukura area.

- ***The community-based trapping programme***

The purpose of this programme is to complement the eradication programmes (which are mainly undertaken with paid staff or skilled volunteers) with a programme for local households and community groups across Banks Peninsula and the Port Hills. Throughout New Zealand, there is a rapidly growing interest in the vision of being predator free. Here in Christchurch, we continue to see growing interest and participation. We are on track to meet our target of 4,000 participating households on the Port Hills alone, with many more across the rest of the City and Banks Peninsula.

Experiences in other centres across Aotearoa New Zealand have demonstrated this demand will continue to grow rapidly. In Wellington, for example, there is now extensive coverage of these groups across the city and a Wellington City Council survey found 92 percent of rate payers

supported the initiative. We want to stay ahead of this high level of demand and have the systems in place to coordinate and support these community-based efforts for effective eradication of pests and enhancement of native wildlife.

There are many willing volunteers, but they need knowledge and organisation to make their efforts rewarding and effective. The funding requested would enable us to provide that. This support is provided collaboratively with a number of other community groups such as the Summit Road Society/Predator Free Port Hills, Banks Peninsula Conservation Trust, community-based trap libraries and other groups across the Peninsula.

- ***Goat Eradication – the goal of eradication of feral goats from Banks Peninsula by 2021***

Past efforts have demonstrated this is an achievable goal with dramatic benefits for biodiversity, the economy and carbon sequestration. This programme is a genuinely collaborative effort, with widespread community input and support across the Peninsula, and supported by staff from the Department of Conservation, Council rangers and the Banks Peninsula Conservation Trust. The 2019 programme removed over 300 goats from Little Akaloa. The programme was disrupted due to COVID last year, but we were on-track to more than double that number in 2021, targeting areas around Mt Evans and south of Little River.

BEFORE AND AFTER REMOVING FERAL GOATS

The photos to the right show before and after the removal of goats. This demonstrates the biodiversity and climate change (carbon sequestration) benefits, which remain persistent and urgent issues that are widely supported by the community and require continued and sustained effort.



Excluding staff time, the cost of this year's goat programme is \$220,000 across all the partners. A substantial component of this utilised financial reserves built up for this purpose by the Banks Peninsula Conservation Trust, but which are now exhausted. The \$40,000 sought from the Council will enable the programme to continue and sits alongside similar contributions from the Department of Conservation and Environment Canterbury.

3: Supporting landowners on Banks Peninsula

Programme 5 *Carbon removal and natural restoration CCC pg 23*

We support the focus areas described in Programme 5 targeted to help carbon capture while benefiting natural ecosystems and biodiversity.

- *Develop an approach to measure, reduce, and offset our emissions.*
- *Increase carbon sequestration through planting and natural regeneration of indigenous, and more fire-resistant forest across Banks Peninsula.*
- *Identify, protect and restore areas of significant indigenous biodiversity.*
- *Naturalise waterways and introduce wetlands across the city.*
- *Restore coastal ecosystems.*
- *Create natural corridors between key forest/planted areas in Christchurch and Banks Peninsula to encourage biodiversity.*
- *Increase tree canopy cover in the city.*

Banks Peninsula is approximately 115,000 ha. Prior to European settlement, most of this land was covered in a dense native forest, which today in places is rapidly and naturally returning. The combination of the terrain, climate, existing seed sources and the birds to spread them, creates a haven for the natural regeneration. 15% of the Peninsula is now dominated by regenerating indigenous vegetation, naturally recovering from its low point of less than 1%.

Landowners on Banks Peninsula, in some cases over several generations, have carefully managed the balance of enhancing ecological restoration on their land through the natural regeneration of native forest, alongside their need to make a living. There is, however, currently a disincentive for landowners to continue this practice under the current ETS. As it stands, the ETS provides a financial incentive for landowners to earn money quickly by planting forests (mainly introduced conifers) to sequester carbon in the short term. There is a real concern that this will result in widescale planting of monocultures, which while making short term economic sense, would have detrimental environmental and biodiversity impacts in the long term. Spray clearing areas of regenerating native bush to prepare for plantations further reduces biodiversity. **What is needed is a change whereby landowners could earn ETS credits for permanent native vegetation regeneration which would incentivise fencing off areas for this purpose.**

Until the ETS is changed we believe that in the short term the solution lies in the creation of a voluntary carbon and biodiversity market. Individuals and businesses are keen to offset their total footprint, not just what is required by regulations. Landowners are keen to find a long term solution to their “problem” of low return paddocks. Often these are areas that are constantly trying to regenerate.

We ask the Council to discuss this opportunity with us and the many other organisations that have been working on developing a voluntary market for carbon and other ecosystem service credits.

We also believe that pursuing optimal environmental outcomes is best done, not at the farm, community or other man-made boundary but that planning should be at the landscape level, as determined by nature, looking ahead for the next 50 years. Planning by catchment area is a good example of this approach. Increasingly landowners are realising this change in approach is needed. They have come to see the limitations of the farm plans they have been providing. However, they have no one to convene them, to provide expertise and coordinate the project.

We are entering a new era on Banks Peninsula and in New Zealand where 'Ecological Aspirations' and 'Farm Land and Water Management' are intersecting. No longer is good land and water management a nice to have, it will become the expectation. It will also not be limited to 'pockets' of a property but integrated across the entire farm boundary and beyond. Today's landowners need independent support on Land and Water Management to assist them through changing environmental regulations and facilitating the planning and implementation of the future vision they have for their properties and wider community.

Alignment to **2050 BPCT Ecological Vision**: *The BPCT Ecological Vision Goal 5: Land primarily used for production and for settlement also supports thriving indigenous biodiversity which facilitates carbon capture. Land managers are aware of and protect ecosystems and biodiversity as a matter of course. Periodic mapping and imaging demonstrates that there is an increase in indigenous biodiversity cover across the Peninsula. The whole community is actively involved in projects to enhance biodiversity, the facilitation and support of good land and water management with rural landowners will provide a trickle down.*

4. Recommendations

4.1 Collaboration and partnership

- **Leverage and expand current collaborative projects** (described in section 1) by working with the Trust to build on existing partnerships involved in enhancing biodiversity outcomes on Banks Peninsula.

4.2 Supporting BP landowners

- Work with BPCT to address the concerns about the ETS which currently incentivises the planting of monocultures.
- Explore ways of providing independent support and advice to landowners to assist them to respond quickly to changing national environmental and biodiversity regulatory environment.

4.3 Carbon sequestration and carbon credits

- Work with the Council to explore opportunities for developing a voluntary market for carbon and other ecosystem service credits.
- Explore avenues for changing the ETS to support credits for native regeneration.

4.4 Financial alignment with CCC Long-term plan 2021-2031

- **Extend BPCT's MOU with CCC by a further 10 years** with \$50k per year of operational support funding (ideally with an inflation adjustment built in annually).
- Agree to a significant **increase to the Biodiversity funding** to include \$400,000 for the 2021/2022 financial year and a continuation of this for the life of the LTP.

- **15% of the \$13.1 million allocated for planting across the city for the purposes of ecological restoration, be allocated to the Te Kāhahu Kahukura project** <https://www.tekahahu.org.nz>

- Support for **Pest Free Banks Peninsula** including:

(a) \$120,000 for the 2021/2022 financial year to continue the current initiatives already underway for locally led pest control activities and Te Kāhahu Kahukura. An expansion of this funding to \$200,000 in 2022/23 and a continuation of this for the life of the LTP. This will enable the extension of this programme across the Peninsula and into adjacent suburbs of Christchurch.

(b) Funding of \$40,000 per year until the year ending June 2024 to support the goal of eradicating feral goats from the Peninsula by 2024. This is an important, collaborative initiative lead by the rural community on the Peninsula and supported by Council staff, the Department of Conservation and Environment Canterbury. It has significant biodiversity, economic and carbon sequestration benefits.

#	SubID	First name	Last name	Name of organisation	Your role within organisation	Comments - Please be as specific as possible to help us understand your views	I'd like to speak
158	39768	Nicky	Snoyink	Forest and Bird	Regional Manager Canterbury/W est Coast	Please see attachment	Yes



25 April 2021

Christchurch City Council
Te Hononga Civic Offices

BY EMAIL:

Feedback on Draft Ōtautahi Christchurch Climate Change Strategy

Introduction

1. Forest & Bird is New Zealand's leading independent conservation organisation. We have played an important role in preserving Aotearoa New Zealand's environment and native species since 1923. We are independently funded by private subscription, donations, and bequests. Our mission is to protect and preserve New Zealand's unique ecological values, flora and fauna, and natural habitats.
2. Forest & Bird has for many years advocated for robust national climate policy and are delighted that Aotearoa New Zealand finally has a Zero Carbon Act. The hard work now begins to develop and implement a pathway toward reducing emissions and meeting international obligations.
3. Climate change is central and overarching to Forest & Bird national strategic objectives which are:

Climate Centred: Aotearoa New Zealand is resilient to the impacts of climate change. Activities or developments in the region must actively mitigate their contribution to climate change. People understand the threat and urgency of climate change and are supported in climate change practices.

Economy that Supports Nature: Aotearoa New Zealand's economy and nature are interconnected. Unhealthy nature equals an unhealthy economy.

Vibrant Landscapes: Aotearoa New Zealand's terrestrial native flora and fauna are protected and enhanced in urban and rural areas. Landscapes are free from pests. Development can occur without clearing and destroying landscapes and their respective natural ecosystems.

Oceans Alive: Aotearoa New Zealand's people recognise the health of the marine environment is a direct result of on-land activities. The regions harbours return to

their original, healthy states. Fishing and aquaculture activities follow ecosystem-based management principles. Thirty percent of Aotearoa New Zealand's marine environment is protected through a network of no-take marine protected areas.

Energised Water, Rivers and Wetlands: Aotearoa New Zealand's rivers and streams are clean, healthy and teeming with life. Wetlands are protected and enhanced.

4. Forest & Bird consider the following principles should underpin any climate change strategy:

Doing our fair share: We must make a stronger global commitment to cutting our emissions and helping developing countries. New Zealand's targets should reflect our economic status, ability to take action, and high current and historical per-capita emissions. This means the Christchurch City Council needs to do everything it can to cut emissions.

Cutting emissions first: A commitment to faster emissions reductions must come ahead of removing carbon dioxide from the atmosphere. We need a transformation to a clean green economy, and that means producing and consuming things without generating greenhouse gases.

Nature-first emission reductions: The methods used to cut emissions must protect our native plants and animals. The council should ensure that all infrastructure to support a low carbon future is located in places and constructed in ways that don't harm nature.

Better land use: Marginal and erodible land needs to be returned to native forests and shrublands, regenerative farming is needed to cut emissions, and there should be fewer cows. The city should look for the potential to store carbon in permanent native forests and restored wetlands within the city boundaries, including on Banks Peninsula.

Help nature help us: Once emissions are reduced, we will still need to remove carbon dioxide from the air to stabilise the climate. Nature can help us do this, but only if we protect it. The Council must strengthen protection for remaining in-situ native vegetation, support pest control and native forest restoration.

Helping each other: We need a just transition that helps communities and workforces to adjust, makes sure vulnerable people are not left behind, ensures new technology and ways of working are available to all, and gives effect to the Treaty of Waitangi.

5. Forest & Bird congratulates the Christchurch City Council on the draft Ōtautahi Christchurch Climate Change Strategy, and we are pleased for the opportunity to provide feedback.
6. As the South Island's largest city, Ōtautahi Christchurch can contribute significantly to ensuring Aotearoa New Zealand is on track to meet its national targets and its international climate obligations. A climate change strategy, with action plans for different sectors including achievable time bound milestones and targets will help provide a climate safe future for Ōtautahi Christchurch's people and nature.
7. Forest & Bird agrees with the Council's statement that:

"Climate change is the biggest challenge of our time. It is already affecting our weather, health and wellbeing, natural environment, taonga species, mahinga kai, food production, biosecurity, infrastructure, and the economy."

8. Forest & Bird supports the strategy goals and the ten action programs. Clearly the council is on the right track and there are many initiatives underway.
9. However, while the draft strategy is strong on what it broadly wants to achieve in the longer term¹, it is vague on how, how much and by when. The strategy lacks a detailed pathway with achievable, timebound milestones. Short-, medium- and long-term targets and milestones are critical to monitoring progress, measuring success and whether goals are on track to be met. These are vital aspects of a good strategy.
10. Without a pathway to the goals there is no real accountability. Milestones need to be frequent enough so that the councillors can be held accountable at elections, and the temptation to postpone action is limited.
11. Forest & Bird recommends developing targets and milestones for the council as an entity in and of itself; and for the ten action programs the council has proposed for the broader Ōtautahi Christchurch area. This will strengthen the strategy considerably. Periodic review is also recommended to ensure the strategy remains fit for purpose over time.
12. The goals, actions and milestones need to be integrated into the council's long-term plan. The council's long term work program needs to complement its broader climate change obligations and goals.
13. Finally, Ōtautahi Christchurch and Aotearoa New Zealand needs to commit to helping its Pacific neighbours who despite a low carbon footprint, will pay a much higher cost, sooner.
14. We hope that our suggestions have been helpful and that they will be reflected in the final Ōtautahi Christchurch Climate Change Strategy.

Thank you for the opportunity to provide feedback.

Nicky Snoyink
Regional Manager Canterbury/West Coast,
Royal Forest & Bird Protection Society of New Zealand Inc.

¹ Council has set the target of achieving net zero greenhouse emissions by 2045 (excluding methane), and to halve emissions by 2030, from 2016-17 levels.