
Christchurch City Council
ATTACHMENTS UNDER SEPARATE COVER

Date: Wednesday 12 May 2021
Time: 9.30am
Venue: Council Chambers, Civic Offices, 53 Hereford Street,
Christchurch

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#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
29	39587	Marc	Duff	Greater Hornby Residents Association	Chairperson	<p>1.7.6 Neighbourhood Parks - medium density catchment</p> <p>You are pleased with the direction of medium density catchment areas where infill DC's are made in your suburb but want the money being collected to be spent in your suburb for increasing amenity value for affected residents. The risk with the proposed direction is it is too wide and not macro enough to be of benefit to the residents who are affected by infill developments.</p> <p>1.7.9 Development Impact Fee</p> <p>You are generally ok with social housing having a DC rebate but you don't want to see govt and city housing providers benefiting at the expense of existing and future residents. There needs to be a way in which these providers can improve amenity in the areas where they often make substantial development for both existing residents and the residents they will bring into the area. One possible solution is to build some trigger into the development impact fee.</p> <p>1.7.1 Catchment assessments for more activities</p> <p>You believe the government should be providing councils more funding for new three waters infrastructure in green field developments in order to reduce costs for all and ensure that infill development contribution money received is largely spent on improving amenity.</p>	Yes

#	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
165	39775	Suky	Thompson	Banks Peninsula Native Forest/Climate Change group	Rod Donald Banks Peninsula Trust Manager	Please see attachment	Yes

2045

Submission to
Christchurch City Council

Ōtautahi Christchurch
Climate Change Strategy
Draft 2021

and

Te Mahere Rautaki Kaurera
Our Draft Long Term Plan

Submitted by
Banks Peninsula Native Forest/Climate Change
group

Comprised of representatives from
Banks Peninsula Conservation Trust
Lucas Associates
Manaaki Whenua / Landcare Research
Maurice White Native Forest Trust (Hinewai Reserve)
QEII National Trust
Rod Donald Banks Peninsula Trust
Orion New Zealand Ltd

18 April 2021

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Preface

The Banks Peninsula Native Forest/Climate Change group is an informal inter-agency alliance seeking to improve opportunities for biodiversity through native forest restoration on Banks Peninsula.

Group members involved in preparing this submission are:*

Organisation	Representative	Role/Qualifications
Banks Peninsula Conservation Trust	Maree Burnett	General Manager
Lucas Associates	Di Lucas	Director, Landscape Planner
Manaaki Whenua / Landcare Research	Larry Burrows	Forest Ecologist
Maurice White Native Forest Trust (Hinewai Reserve)	Bruce Hansen Hugh Wilson	Trustee Trustee and Manager
QEII National Trust	Alice Shanks	Central Canterbury Representative
Rod Donald Banks Peninsula Trust	Suky Thompson	Trust Manager
	Bob Webster	Trustee – Landowner participating in ETS/1BT
	Bryan Storey	Trustee – Geologist
Orion New Zealand Limited	Clayton Wallwork	Forest and Biodiversity Lead

We wish to make an oral submission in support of our written submission.

Address for service

Banks Peninsula Native Forest/Climate Change group
c/o Suky Thompson
Rod Donald Banks Peninsula Trust Manager

**Other local scientists/experts who have been consulted and involved in the group include Nick Head, Christchurch City Council Senior Ecologist and Helen Greenep, Environment Canterbury Biodiversity Officer for Banks Peninsula.*

1 Introduction

The Banks Peninsula Native Forest/Climate Change group is a collaboration of experts from organisations and agencies with knowledge of, an interest in, and/or responsibility for the protection and enhancement of native biodiversity and natural landscapes on Banks Peninsula.

The group formed in 2019 to explore the interface between native forest regeneration and carbon sequestration and to find ways to incentivise a change in marginal land use from farming to native forest, in particular through improvements to the Emissions Trading Scheme, so that setting land aside for sequestering carbon in permanent native forests becomes a financially viable alternative to pastoral farming and rotational forestry..

We have since made substantial submissions to the Climate Change Response (Emissions Trading Scheme) Amendment Bill, the Climate Change (Forestry Sector) Regulations 2008, the associated Select Committee process and more recently to the Climate Change Commission's draft advice (Feb 2021) and the Environment Canterbury LTP (April 2021).

We strongly support the Council's draft Climate Change Strategy and urge that funding to begin implementing it is added to the Long Term Plan 2021-31, coming on stream from FY22.

We offer positive and innovative ideas that contribute to climate solutions for Christchurch and can be implemented immediately. We focus on areas identified in the *Programme 5 Carbon removal and natural restoration*. We submit that these ideas can be implemented cost effectively through existing budgets and community channels by giving greater support to initiatives that are already underway.

The Climate Change Commission has made it clear that work must start now to achieve the transformational and lasting change needed across society and the economy. Harvesting the low hanging fruit on Banks Peninsula presents Christchurch City Council with a win-win for biodiversity, climate change and the economy.

We appreciate the funding proposed in the LTP for the Rod Donald Trust, Banks Peninsula Conservation Trust, Biodiversity Fund and Regional Parks. However, the funding allocated will only serve to support current levels of progress at best, not the step-change required to meet the transformational changes identified in the Climate Change Strategy. We therefore request that the Council makes the following changes to the LTP to enable implementation of Programme 5 as follows:

- Increase funding for the Banks Peninsula Conservation Trust - it is leading the core initiatives needed for landscape scale change for biodiversity on Banks Peninsula, implementing the Banks Peninsula Ecological Vision and Pest Free Banks Peninsula.
- Increase the Biodiversity Fund to support private landowners setting aside land for biodiversity.
- Allocate funding to support purchase of land for carbon sequestration in native forest, principally for natural native regeneration, potentially with additional grants to Rod Donald Trust.
- Improve planning regulations and compliance to support biodiversity and incentivise native regeneration and the attendant carbon sequestration, discourage native clearance and pine forestry, and support reduced stocking.

Most of the funding requested above involves outsourcing work to community organisations and private landowners who are already working on these projects, so does not increase the Council's own workload.

We request that the funding needed is sourced through re-applying the climate change lens to some of the LTP big ticket projects comparing the value delivered by making the modest changes suggested above to speed up initiation of the Climate Change Strategy. We submit that all of the

above can be achieved with minimal impact on the overall budget of \$13.1billion proposed in the LTP and will deliver runs on the board and very good value for the Climate Change strategy.

Banks Peninsula presents the Council with an opportunity to sequester large amounts of carbon in permanent native forest, and to create a massive sink by 2050 when the City must meet its zero emissions targets.

2 Why we support the draft Climate Change Strategy

We support the draft Climate Change Strategy because the world now has less than 10 years to make transformative changes toward minimising global warming and the restoration of natural environments.

The Council declared its Climate and Ecological Emergency two years ago. It has developed a good strategy and we agree with the goals, principles and programmes that the Council has identified.

We suggest that the final principle for responding to climate change listed in the strategy is amended to show the Council's commitment to addressing the Climate and Ecological emergency by including a commitment to funding as follows:



We will support **and fund** positive and innovative ideas that contribute to climate solutions for Christchurch.

The thrust of our submission is that funding needs to be allocated **now** in the LTP so that existing initiatives by community groups and the private sector can be rapidly expanded. There is no need to wait for further strategy. The work is already in progress, is making a difference, but is held back by limited funding.

What we are suggesting are relatively minor funding changes relative to the total LTP spending, and that will deliver immediate and certain gains toward unlocking the vast carbon sequestration and biodiversity potential of Banks Peninsula.

3 Restoring Te Pātaka o Rākaihautū/Banks Peninsula

Environment Canterbury recently funded the Environmental Defence Society case study *Restoring Te Pātaka o Rākaihautū/Banks Peninsula*. This is an excellent report which identifies that the current regulatory and financial incentives pose threat to native biodiversity and the landscape and makes key recommendations¹ relevant to the Christchurch City Council LTP about how this can be turned around:

- Supporting initiatives of the Rod Donald Banks Peninsula Trust, Te Pātaka o Rākaihautū/Banks Peninsula GeoPark Trust, Banks Peninsula Conservation Trust and the work of others involved in covenanting and facilitating landscape-scale restoration and recovery projects
- Continue to support the work of the BPCT and others in covenanting and facilitating broader landscape-scale restoration and recovery projects
- Review the Christchurch District Plan, following active engagement with the community, to

¹ Peart, Raewyn and Woodhouse, Cordelia, Environmental Defence Society, *Restoring Te Pātaka o Rākaihautū/Banks Peninsula*, February 2021 p72

ensure it fully recognises cultural and natural landscapes including more comprehensively mapping the Outstanding Natural Landscape (ONL) areas

- Continue community engagement on the assessment and status of Sites of Ecological Significance (SEs) in Schedule B of the District Plan.

Our detailed requests are explained below

4 Focus on natural regeneration for Banks Peninsula

We seek greater recognition in the LTP for the unique role that Banks Peninsula can play for Christchurch as a biodiversity hotspot and vessel for carbon sequestration through natural regeneration.

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

The Peninsula therefore provides “low-hanging fruit” for Christchurch to achieve its goal of accelerating regeneration of the natural environment – ***through harnessing the natural process of regeneration and reduced stock numbers to reduce and offset emissions.***

We are pleased that the Climate Change Strategy has identified a focus area for Programme 5 as:

Increase carbon sequestration through planting and natural regeneration of indigenous, and more fire resistant forest across Banks Peninsula.

We are pleased that the opportunity to achieve sequestration through indigenous forest and particularly through natural regeneration of indigenous forest on Banks Peninsula has been recognized. We encourage the Council to continue to make a clear distinction between the activity of planting and the natural process of regeneration in its biodiversity and climate work. Having clarity between these two different activities will be critical to getting new incentives and programmes right.

4.1 Planting native forests

- Planting a native forest means that humans are in charge.
- Seedlings are grown in nurseries, certain species selected for planting and then planted out.
- Planting a native forest is not in this sense different from planting an exotic forest. It is a human construct with defined and documented parameters that can be easily measured by human tools.

4.2 Natural Regeneration

- Natural regeneration, also known as rewilding or reversion means that nature is in charge.
- This is a completely different construct and not so easily measured by human tools.
- Seeds are spread by birds, wind and water in an apparently random way, meaning the species mix can be much more complex and diverse.
- Regeneration happens gradually as the conditions become right for seed germination and survival.
- Regenerating forests gradually spread out from existing nodes or margins rather than happening all at once, and typically follow a succession pattern.

- Species such as bracken, bush lawyer, poroporo, tutu, mātā and pohuehue may appear first in grasslands, and once they have broken the sward, then sub-canopy tree species such as mahoe or kanuka follow.
- The role of humans is to assist nature, not to control the process

4.3 Natural regeneration is more cost effective

Revegetation through the planting of native seedlings is much more labour intensive and expensive than planting exotics such as pines or eucalypts. The native seedlings are more expensive to propagate and will generally involve diversity, not a monoculture. The area to be planted must be well fenced to exclude grazing stock. Prior to planting competing vegetation such as grass must be completely removed or sprayed in advance. Then good holes need to be dug, the trees planted gently and with care, and mulches or weed mats applied to reduce grass and weed competition, and hare guards staked in place as most native species are highly palatable.

The planted natives then require quite extensive aftercare to ensure ongoing releasing from competing grasses and weeds for two to three years until a canopy is established. Even once the canopy is established, pest control to deal with browsers such as deer may be needed, and to achieve the full biodiversity benefits. Fences must be maintained to dissuade neighbouring grazing stock from entering and damaging the forest.

All of these costs and issues are exacerbated on steep marginal land which is hard to work on and often hard to get labour too.

Care must be taken to use eco-sourced native plants to avoid pollution of the local genetic resource through the introduction of non-endemic varieties.

As we have already described, on Banks Peninsula natural regeneration occurs rapidly wherever nature is given a chance with seed nearby, once human action to remove it (such as spraying, cutting or grazing with goats) ceases. Regeneration of non-palatable species that can tolerate some grass competition happens even in pasture provided that it is near to seed sources and not subjected to human clearance.

Natural regeneration is therefore much more cost effective than planting (estimated at \$1,500 per hectare for natural regeneration compared to \$15,000 - \$50,000 per hectare for planted native forest), as nature does the bulk of the work – growing the seeds and distributing them – obviating the need for expensive human labour. Seedlings that thrive in any particular environment are those best suited to that environment, and a highly diverse species mix is likely to eventuate through natural regeneration, once grazing stock have been removed.

Aiming to afforest marginal land further tips the balance in favour of natural regeneration.

Pest and weed control and fencing are needed regardless of whether native afforestation occurs as a result of planting or natural regeneration, so these ongoing costs are similar for both methods.

For these reasons, we consider that natural regeneration should be the principal method by which Programme 5 aims to remove carbon and restore the natural environment.

Planting native forest should be principally seen as a tool to engage people and communities on easy front country projects or sites with no available seed sources.

There may be also be some situations where limited enrichment planting could speed the process of natural regeneration, and further research on this would be useful.

This is a link to a successful natural regeneration approach by the Hinewai Reserve as an example of how this can be achieved - <https://www.youtube.com/watch?v=3VZSJKbzyMc>

4.4 Action is needed now

The Climate Change Strategy identifies that:

On Banks Peninsula, increased drought conditions will place the surface and drinking water supply under increasing strain, increase the risk of wildfires, and increase the erosion of soils, making revegetation more difficult.

Whereas pine forest significantly reduces water yield, having more native forests on Banks Peninsula will support water retention, help to reduce the impact on water supplies, all of which are stream or spring fed and reduce the risk of fire and erosion. As the Strategy identifies, revegetation will get more difficult as droughts bite further. This creates an imperative to speed up and increase forest cover urgently through regeneration before it too gets more difficult.

5 Increase support for the Banks Peninsula Conservation Trust and biodiversity initiatives it leads

Banks Peninsula Conservation Trust has been working since 2001 to support private landowners who philanthropically protect biodiversity on their property through conservation covenant. These covenants help to sequester carbon and to provide seed sources that further accelerate the natural regeneration process.

The role of Banks Peninsula Conservation Trust has now grown from private land owner support to to one of leading and coordinating biodiversity and conservation initiatives across the Peninsula, by implementing the Banks Peninsula Ecological Vision it developed in 2016. We seek greater support for Banks Peninsula Conservation Trust including Pest Free Banks Peninsula.

5.1 Increase the direct funding grant

Banks Peninsula Conservation Trust runs extremely efficiently, but staff still need to divert effort into the time-consuming and frustrating exercise of finding funding to support salaries and operational costs. A small increase in annual funding for the Banks Peninsula Conservation Trust would further increase the conservation gains it is making.

We support the current grant proposed of \$50,000 to the Banks Peninsula Conservation Trust, and ask that this is increased to \$100,000.

5.2 Integrate the Ecological Vision 2050 for Banks Peninsula/Te Pātaka o Rākaihautū into the Biodiversity Strategy

The Minister of Conservation launched the Ecological Vision 2050 for Banks Peninsula on November 2016. The Vision, first developed by the Banks Peninsula Conservation Trust, has met with wide acceptance and has been approved by a range of both Councils, and, organisations, agencies and trusts working across the Peninsula.

We submit that the Ecological Vision 2050 for Banks Peninsula/Te Pātaka o Rākaihautū is now integrated into the Climate Change Strategy and Council biodiversity planning and funding is allocated to assist with achieving the eight goals it sets out for Banks Peninsula.²

5.3 Reinstate funding for Pest Free Banks Peninsula

Controlling and eventually eliminating pests is another 2050 goal for New Zealand, and one that directly supports improved outcomes for biodiversity and increased sequestration as a result.

The previous grant of \$60,000 per annum to Pest Free Banks Peninsula should be reinstated for each year of the LTP and increased.

Pest Free Banks Peninsula is one of the finest examples of effective multi-agency and community co-operation, and is employing a growing number of people providing new jobs that are focused on

² Banks Peninsula Conservation Trust, 2050 Ecological Vision for Banks Peninsula/ Te Pātaka o Rākaihautū including Port Hills

the transformative changes needed rather than propping up business as usual activities. Christchurch City Council should continue contributing this modest level of funding to it.

6 Increase support for conservation on private land through the Biodiversity Fund

The best and cheapest way to increase the area under conservation management is to partner with private landowners and covenanting agencies.

We are shocked to realise that although Programme 5 in the identifies the Christchurch Biodiversity Fund as one of the principal examples of what is happening already, **funding for the Biodiversity Fund has actually been cut in the LTP**, from the already miniscule sum of \$200k per annum to \$190k per annum.

As Programme 5 identifies, the fund provides grants to private landowners to protect and enhance sites of ecological significance. It is primarily used for fencing around covenants.

Fencing to exclude grazing stock is the biggest single up-front cost facing landowners wishing to set aside land as permanent native forest. On Banks Peninsula fencing is difficult and expensive due to the steep rock hillside with numerous springs and streams, with a median cost of \$28-\$30 per metre. Most covenants protect waterways and bush in linear gullies. The \$200,000 previously allocated to the Christchurch Biodiversity Fund per annum only pays for 50%-60% of 14 km of fencing. That is 4-5 covenants per year.

The funds are efficiently distributed with Christchurch City Council and Environment Canterbury co-operating with the two covenanting authorities, BPCT and QEII Trust. However, the funds available are insufficient, hotly contested, and fail to cope with the current demand of voluntary covenanting. Both covenanting agencies have waiting lists.

The most efficient way to achieve Programme 5 would be to support more covenanting on private land. We therefore recommend that the grant to the Biodiversity Fund is at a minimum doubled in FY22 to \$400k and increases each year thereafter.

7 Allocate funding to support the purchase of land for carbon sequestration via native forest

Programme 5 lists focus areas to:

- *Identify, protect and restore areas of significant indigenous biodiversity, and*
- *Create natural corridors between key forest/planted areas in Christchurch and Banks Peninsula to encourage biodiversity.*

Hinewai Reserve is identified as an example of what is already happening on Banks Peninsula. Hinewai exists solely because of private philanthropy, and we believe that the time has come when conservation needs to be a mainstream activity – carried out for financial purposes and for public benefit such as offsetting hard to eliminate emissions from organisations such as the Council.

7.1 Establish a Land acquisition fund

We believe Christchurch City Council should be purchasing or contributing to the purchase of land on Banks Peninsula for the purpose of creating more regional conservation parks – more places like Hinewai. These would be places where native biodiversity flourishes and regenerates and where the public are enabled to visit and enjoy low-carbon recreation in a way that respects the biodiversity and engages them in learning and guardianship.

We do not mean by this that the Council would necessarily own such parks. Instead, to reduce the land-owning risk and costs to the Council we suggest it sets up a land-acquisition fund as part of its

support for biodiversity protection. The fund would be available for land purchases by conservation organizations for the benefit of biodiversity, landscape and recreation. The Nature Heritage Fund has not been open for applications from Canterbury for two years (the next funding round has not been advised). This has left landowners who wish to sell land with high biodiversity values on their farms with no option but to sell for continued farming or exotic forestry, as at this stage conservation land rarely brings in an income.

There are known opportunities of land on Banks Peninsula with high biodiversity values that require the catalyst of funding from the Council. This would enable local Trusts to acquire such land for the public good and public enjoyment and education, and landowners who would like to exit from land knowing that conservation and carbon sequestration is the best land use.

7.1.1 Additional support for Rod Donald Trust

Another efficient way to do support land acquisition would be to bring forward and increase the capital injections to CCO Rod Donald Banks Peninsula Trust.

This independent Trust has delivered excellent value for money over its 10 year existence to date and proved nimble when it comes to seizing land purchase opportunities in a way that the Council itself, constrained by the Local Government Act, cannot equal.

Christchurch City Council is planning to inject further funds into the Trust from FY 24 through its LTP, but these will only be sufficient to enable it to continue operating as it has done to date. Increased funding would give the Trust a large capital based and increase its ability to secure land for biodiversity and carbon sequestration in tandem with building community engagement and action through non-motorised public recreational access.

We suggest that the Council start with a contribution toward the Te Ahu Pātiki park that the Trust is currently crowd-funding for. This would enable it to notch up an immediate win, as the land is to come into the ownership of the Trust on 1 July 2021, the first day of the new LTP. This would provide a way for the Council to signal its commitment to biodiversity and carbon sequestration and be directly associated with a new highly visible and popular regional park, without the ongoing responsibility of ownership.

8 Support for Regional Parks

We support the funding for the Regional Parks team. This group does an excellent job of supporting biodiversity initiatives in the area, but is always constrained by funding. Further funding would enable more weed control initiatives and the more rapid development of the Misty Peaks and Te Oka Reserves

9 Improve the regulatory and compliance framework

Earlier we stated that native forest is rapidly and naturally returning on the Peninsula. The changes we have described above are those that support people to work with nature to support this regeneration.

The changes we request under the regulatory and compliance framework are for Christchurch City Council to ensure its regulations adequately protect native vegetation and that deliberate destruction of established native vegetation contrary to the regulations is identified and penalties imposed.

Recently there has been a disturbing trend of spraying large stands of native vegetation to improve pasture. This is counter-productive to the goals set out in the Climate Change Strategy and LTP. We share the concerns of the Environmental Defence Society that the permissive new standards introduced through the National Environmental Standards for Plantation Forestry (NESPF) present a threat to the landscape and biodiversity on Banks Peninsula.

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We support the recommendation of the Environmental Defence Society that the Council:

- Review the Christchurch District Plan, following active engagement with the community, to ensure it fully recognises cultural and natural landscapes including more comprehensively mapping the ONL areas
- Continue community engagement on the assessment and status of SESs in Schedule B of the District Plan

We ask that these matters are funded through the LTP.

We also ask that the Council advocates to central government for improvements to the Emissions Trading Scheme to make the registration of naturally regenerating areas easier. This is key to unlocking the huge potential for Banks Peninsula land use to shift from pastoral farming and exotic rotational forestry to carbon sequestration in permanent native forest to create a massive sink for Christchurch by 2050 when it must meet its zero emissions targets.

We ask too that the Council advocates to central government to amend the NES PF to prevent less appropriate pine forestry.

10 Conclusion

The Climate and Ecological emergency has been recognized at both the national and Canterbury level.

The Banks Peninsula Native Forest Climate Change Group asks Christchurch City Council to recognize the role that Banks Peninsula can play as it shifts the regulatory and incentive framework toward one that supports carbon removal and natural restoration and to help fund this change.

The only thing stopping Banks Peninsula becoming cloaked once again in native forest is human activity.

The Banks Peninsula Native Forest Climate Change group supports the Council's draft Climate Change Strategy and urges the Council to start implementing it now through increased funding to initiatives and programs already underway on Banks Peninsula.

With appropriate support from Christchurch City Council a shift from pastoral farming and exotic forestry to native forest regeneration on marginal land could be rapidly achieved and on a landscape scale, creating massive gains for biodiversity, climate change mitigation and adaptation, and drought resilience. This would position the Council well to meet its Climate Change targets, particularly the need to deal with those residual emissions that cannot be eliminated through reductions by 2050.

#	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
164	39774	Suky	Thompson	Rod Donald Banks Peninsula Trust	Trust Manager	Please see attachment	Yes

Trust behalf of: Manager

Te Mahere Rautaki Kaurera - Our Draft Long Term Plan 2021-31 from Thompson, Suky organisation: Rod Donald Banks Peninsula

Te Mahere Rautaki Kaurera - Our Draft Long Term Plan 2021-31

Submitter Details

First name: Suky Last name: Thompson

Organisation name, if you are submitting on
behalf of the organisation:

Rod Donald Banks Peninsula Trust

Your role in the organisation: Manager

Would you like to present your submission in person at a hearing? (if yes, you must provide a contact phone number)

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Attached Documents

File
RDBPT CCC LTP 2021-31 and Climate Change Strategy submission V3-1 submitted



Submission to

Ōtautahi Christchurch
Climate Change Strategy
Draft 2021

and

Te Mahere Rautaki Kaurera
Our Draft Long Term Plan

Rod Donald Banks Peninsula Trust

We wish to be heard in support of our submission at hearings
for both consultations.

Contact details: Suky Thompson, Trust Manager,
Postal address:
Organisation role: Conservation and recreation on Banks Peninsula

Submission summary

The Rod Donald Banks Peninsula Trust is a Christchurch City Council controlled organisation founded in 2010 for the benefit of Banks Peninsula/Te Pātaka o Rākauhautū residents and visitors.

We strongly support the Council's draft Climate Change Strategy and urge funding for it to be included in the Long Term Plan 2021-31, coming on stream from FY22.

We offer positive and innovative ideas that contribute to climate solutions for Christchurch and can be implemented immediately. We focus on areas identified in Programme 5 *Carbon removal and natural restoration*. Our ideas can be implemented cost effectively through existing budgets and channels. We suggest that the relatively minor costs are funded through the Long Term Plan either by adjustments to other budgets –another review using the climate change lens may well identify less-cost effective uses – or through an increase in rates or borrowing if none can be found.

The Climate Change Commission has made it clear that work must start now to achieve the transformational and lasting change across society and the economy needed. Harvesting the low hanging fruit on Banks Peninsula presents a win-win for biodiversity, climate and the economy.

The changes we suggest will further the Trust vision of:

Ko te whakawhanake kaitiaki taiao nā te whakahōu ara hīkoi, ara paihikara, te whakaniko rerenga rauropi, te whakamana mātauranga me te mahi tahi ki ngā tāngata e kaingākau kaha ana ki Te Pātaka o Rākauhautū hoki.

Developing environmental guardians of the future through improved public walking and biking access, enhancing biodiversity, promoting knowledge and working in partnership with others who share our commitment to Banks Peninsula.

The Trust works in partnership with Banks Peninsula Conservation Trust, Department of Conservation, Pest Free Banks Peninsula, mana whenua, local communities, organisations and authorities, landowners, and the Christchurch City Council on projects that support its pillars of access, biodiversity and knowledge.

The Rod Donald Banks Peninsula Trust strongly supports:

- The new funding in the LTP for the Rod Donald Banks Peninsula Trust via two capital injections and an annual operating grant. This will enable the Trust to continue serving the Peninsula and the Council and delivering our strategic plan.
- Continued funding for Banks Peninsula Conservation Trust, the Biodiversity Fund, and the programmes delivered via the Regional and Community Parks teams that support our vision.

The Rod Donald Banks Peninsula Trust seeks in addition:

- A financial contribution toward the capital and operating costs of the new Te Ahu Pātiki conservation park. We suggest \$50,000 capital and \$10,000 annually.
- Funding for Enviro Schools to be re-instated and increased to at least \$100k per annum.
- More public funding to purchase land for biodiversity and low carbon recreation
- Integration of Banks Peninsula Ecological Vision into the Council's biodiversity work
- Increased support for other groups and organisations that work together to deliver biodiversity and climate change outcomes, including slow tourism
- Retention of public land that has biodiversity, carbon sequestration and recreational benefits.

We act as the convenor for the Banks Peninsula Native Forest Climate Change group and support the measures in its submission to enact Programme 5 of the new Climate Change Strategy through.

- Increased funding for Banks Peninsula Conservation Trust and the programmes it supports
- Increased budget for the Biodiversity Fund
- Land purchase for conservation
- Improved regulatory and compliance framework.

1 Climate and biodiversity funding needed urgently now

In 2019 the Christchurch City Council declared a Climate and Ecological Emergency and then adopted ambitious greenhouse gas emissions targets for our district. However, a full two years later, the 10 year funding program outlined in its 2021-31 LTP remains directed toward high carbon footprint activities based on the resumption of tourism in its previous form once Covid-19 travel restrictions are lifted, while the funding for biodiversity, carbon sequestration and low- carbon recreational activities that will enact the Climate Change Strategy remain tiny by comparison and are in some cases is even being cut.

We appreciate that substantial funding is going into the cycleway program within the city, but apart from that, we are concerned that unless the Council really changes the activities it funds to actively incentivise low-carbon travel and recreation and maximise sequestration, then emissions will continue to rise rather than reduce in the coming years, and what remains of our once rich biodiversity will further reduce.

Whilst we greatly appreciate funding for the Rod Donald Trust and this will be a great help to the Trust achieving its objectives for the Peninsula and for the Council, and whilst this includes significant environmental education, biodiversity and climate change outcomes, this is only a part of what is required to make the difference needed. Additional funding for these activities is required over the life of the plan and starting in year one.

We are therefore asking the Council to take a hard look at its LTP and to find funding to support projects that lead to genuine emissions reduction, carbon sequestration in tandem with biodiversity enhancement and changes in attitudes and behaviour of the population toward low-carbon recreation that have begun as a result of Covid-19.

Our submission focusses on ways we think the Council could achieve this using the natural attributes and existing initiatives on Banks Peninsula. Banks Peninsula represents 75% of the total land area of Christchurch City and although the population of the area is small, it is highly dedicated to the restoration of biodiversity and has many excellent initiatives underway that could achieve much more, with relatively small injections of funding. There is no need to wait until detailed programmes are worked up under the Climate Change Strategy – there are many things that can be done immediately – and where relatively small amounts of funding will make a huge difference.

2 Recognise Banks Peninsula's role in achieving climate and biodiversity goals and public education

The Trust seeks a greater recognition in the LTP for the unique role that Banks Peninsula provides for Christchurch as a biodiversity hotspot and vessel for carbon sequestration through natural regeneration, and how this can build community engagement and action through low-carbon recreational opportunities.

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

The Peninsula therefore provides “low-hanging fruit” for Christchurch to achieve its Climate Change Strategy Goal 4 *We are guardians of our natural environment and taonga*, and Programme 5 *Carbon removal and natural restoration*.

We would like to see this achieved on Banks Peninsula through greater funding for biodiversity to create further public regional parks, greater incentives to private landowners to protect biodiversity, more assistance with pest control and more rigorous enforcement when native biodiversity is cleared. We would like to see a greater recognition of the role of native biodiversity in both mitigating and assisting adaptation to climate change. We would like to see more opportunities for people, including children and young

people, to get out into these areas through low-carbon activities such as walking, cycling and tramping, and to learn more about the environment when they do.

2.1 Restoring Te Pātaka o Rākaihautū/Banks Peninsula

Environment Canterbury recently funded the Environmental Defence Society case study *Restoring Te Pātaka o Rākaihautū/Banks Peninsula*. This is an excellent report which identifies that the current regulatory and financial incentives encourage landowners to establish new exotic forestry plantations on Banks Peninsula along with the significant threat this poses to native biodiversity and the landscape.

The report makes key recommendations¹ relevant to the Christchurch City Council LTP including:

- Supporting initiatives of the Rod Donald Banks Peninsula Trust, Te Pātaka o Rākaihautū/Banks Peninsula GeoPark Trust, Banks Peninsula Conservation Trust and the work of others involved in covenanting and facilitating landscape-scale restoration projects
- Develop a tourism destination management plan for the Akaroa area which prioritises slow tourism and deeper engagement of visitors in the cultural, historical and natural landscape.
- Continue to support the work of the Banks Peninsula Conservation Trust and others in covenanting and facilitating broader landscape-scale restoration projects
- Review the Christchurch District Plan, following active engagement with the community, to ensure it fully recognises cultural and natural landscapes including more comprehensively mapping the Outstanding Natural Landscape (ONL) areas
- Continue community engagement on the assessment and status of Sites of Ecological Significance (SESs) in Schedule B of the District Plan.

We urge the Council to read this report and implement its recommendations. We provide suggestions on how this can be achieved throughout this submission.

2.2 Now is the time for slow tourism

Covid-19 has demonstrated the desire of people to get out and explore their backyard and that this has by and large been beneficial to tourism on Banks Peninsula. Akaroa, for example, is in a much healthier state than when conventional international tourism was at its height, and the town was overwhelmed by short stay international cruise visitors.

We submit that low carbon recreation needs to be the focus for the tourism industry. In practice this means retaining as much local and domestic tourism as possible and providing slow low-carbon activities for visitors.

Banks Peninsula provides an ideal place to increase opportunities for tramping, walking and cycling through its beautiful natural environment, and to encourage international tourists to stay for longer in the area.

3 Funding for Rod Donald Banks Peninsula Trust – an excellent start

The Rod Donald Banks Peninsula Trust was founded by the Council in 2010. It was provided with an initial capital grant derived from the sale of farms that had belonged to the Banks Peninsula District Council and its predecessor Councils since the 19th century. The funds have been used in an extremely cost-effective manner to further the Council's Public Open Space and Biodiversity Strategies. As a CCO, the Trust has proved sufficiently nimble to be able to seize opportunities for public and environmental good where the Council itself is too constrained. To date this has included securing over 1000ha for biodiversity reserves in conjunction with public access, developing and promoting the many low-carbon walking and cycling

¹ Peart, Raewyn and Woodhouse, Cordelia, Environmental Defence Society, *Restoring Te Pātaka o Rākaihautū/Banks Peninsula*, February 2021 p72

opportunities on the Peninsula, seed funding biodiversity initiatives and building partnerships across the spectrum with community organisations and Papitipu runanga.

The Trust is pleased that the Council has recognised its success through awarding it further capital funding and an operational grant through the LTP. We strongly support this new funding commencing in FY24 which will enable the Trust to continue to operate and to achieve its strategic plan “Striding Forward | Hikoa Whakamua 2020-2030”.

We do however ask that the Council make provision in its LTP for an additional grant to support the Te Ahu Pātiki conservation park project and consider bringing the capital grants to the Trust forward.

3.1 Financially support the Te Ahu Pātiki purchase with a \$50,000 grant

The Trust will settle the purchase of Te Ahu Pātiki on 1 July 2021. This will create a new 500ha conservation park protecting the two highest peaks in Christchurch, Mt Herbert and Mt Bradley, for biodiversity to regenerate and with full public access. The new park will be highly visible from everywhere in the Whakaraupō/Lyttelton Harbour basin, the peaks are visible from much of the city, and the new park will provide an exemplar for biodiversity restoration and protect access on Te Ara Pātaka, the highly popular and premier tramping network in the Christchurch area.

The Trust is putting in a substantial amount of its current capital into the project. Orton Bradley Park is also making a significant financial contribution. The Trust has been crowd-funding since November 2020 and has now attracted over \$435,000 in donations from over 400 donors – demonstrating the popularity of the project. The Trust is currently \$150k short of its fundraising target and **invites Christchurch City Council to become a Tōtara level sponsor for the project by contributing \$50,000 directly toward the purchase** through an additional grant in this LTP.

The project is supported by the Banks Peninsula Zone Committee, Te Hapū o Ngāti Wheke, who hold mana whenua over the area, and the Whaka-Ora Healthy Harbour group. We attach letters of support from these organisations to our submission.

3.2 Consider bringing the Trust capital grants forward

The LTP lists two capital injections to the Rod Donald Trust of \$1.35m each, the first in FY24, the second in FY27. These grants have been allocated subsequent to the Trust informing the Council in 2019 that it expected its capital reserves to be depleted below a level where it could continue to function once it had completed the Te Ahu Pātiki purchase. This was followed by an intensive Joint Working Party that reviewed the achievements of the Trust during its first 9 years of operation and the extent to which its Strategic Plan “Striding Forward | Hikoi Whakamua” would achieve Council goals for Public Open Space and Biodiversity.

We are most grateful for the new grants that recognise the value of the Trust’s work.

Given the new focus on Climate Change, the needs of Banks Peninsula and the opportunities it offers to the Council to create a large carbon sink for the future through biodiversity restoration, we ask the Council to consider bringing forward the capital grants by one or two years so that the first injection occurs on July 2021 if possible or July 2022. This is because the Te Ahu Pātiki purchase which settles on 1 July 2021 will deplete the Trust’s capital reserve to below \$1 million considerably curtailing its ability to seize opportunities for major projects in the next two years.

This is already impacting our effectiveness. For instance, the Trust was not in a financial position to make a bid recently when a property ideal for the combination of biodiversity restoration and low-carbon recreation came on the market.

As the submission from the Banks Peninsula Native Forest Climate Change group makes clear, the current regulatory framework means that biodiversity on Banks Peninsula is under threat, particularly because the new permissive National Environmental Standards for Plantation Forestry (NESPF) mean exotic rotational forestry is now a permitted activity on most of the Peninsula. This means that when properties with high biodiversity values come on the market, they are at high risk of purchase for the purpose of pine forestry, with all the associated negative impacts on the landscape, wilding control, soil erosion and biodiversity. It is

critical that there is funding to secure such properties in these circumstances so that biodiversity may come first.

4 Increase funding for biodiversity initiatives already underway

The Banks Peninsula Native Forest Climate Change (BPNFCC) group submission describes the potential for Banks Peninsula to sequester carbon on a landscape scale in tandem with biodiversity enhancement through facilitating rather than fighting the natural regeneration process – as has been so aptly demonstrated at Hinewai Reserve. The submission advocates for an increase in several funding programmes and community initiatives underway that support the Council's Climate Change Strategy, would not create extra work for the Council and could be ramped up immediately with increases to the very modest levels of funding they currently receive.

We support and agree with the submission from this group for:

- Increased funding for Banks Peninsula Conservation Trust and the programmes it supports, including incorporation of the Banks Peninsula Ecological Vision into the Council's strategies, and the work of Pest Free Banks Peninsula.
- Increased budget for the Biodiversity Fund to support private landowners who protect biodiversity for philanthropic reasons
- Establish a land purchase for conservation, or achieving further land purchase via an increased grant to the Rod Donald Banks Peninsula Trust
- Improved regulatory and compliance framework to protect biodiversity. Particularly with regards to consents to clear land of native vegetation.

We agree with and support the reasoning in that group's submission and therefore do not repeat it here.

4.1 Retain Diamond Harbour land as a regional park

A large block of Council owned land in Diamond Harbour is earmarked for disposal. The land is intersected by several gullies which host waterways and native biodiversity and are used for recreational walking, including the track leading to the summit of Mt Herbert/Te Ahu Pātiki and the Te Ara Pātaka network, and the School Track which enables children to walk safely to school instead of being driven by their parents.

Our preference is that this be revegetated in native forest for carbon sequestration and retained with a new status as a regional park. Selling it would be entirely contrary to our view that the Council should obtain more regional parks for sequestration. It is essential that the bush gullies and the walking tracks are protected. Although the Trust generally favours natural regeneration, this land, right in the centre of an urban area, would be ideal for planting, and would provide an excellent place for a climate change community engagement project.

5 Support public education and low-carbon recreation activities

Banks Peninsula offers wonderful low-carbon recreation and tourism activities to Christchurch. We encourage the Council to support the development of these in tandem with new carbon sinks for based around biodiversity regeneration. The two are a natural fit. Getting more people into the environment through low-carbon recreation such as walking, tramping and cycling provides the opportunity for education, changing attitudes and developing environmental guardians of the future – when this is done in tandem with biodiversity restoration.

We agree with the Environmental Defence Society recommendation that the Council

- *Develop a tourism destination management plan for the Akaroa area which prioritises slow tourism and deeper engagement of visitors in the cultural, historical and natural landscape.*

We go further and suggest that a tourism and visitor destination management plan prioritizing slow tourism and deeper engagement of visitors is developed for the whole Peninsula.

As tourism recovers from Covid-19 it is critical that it does not return to the previous uncontrolled mass-tourism model based on extremely high short-stay visitor numbers. This uncontrolled tourism was seriously damaging the social licence for tourism and causing environmental damage.

In our work we encountered this on virtually every project. For instance, landowners were at times reluctant to create walking easements over private property for fear of uncontrolled visitor numbers. There were concerns over human waste on tracks and at car park areas. At the same time there was a great reluctance to introduce public toilets (such as pit toilets) in busy locations on the basis that this would encourage further misuse through uncontrolled freedom camping.

Fire risk in remote areas was an ongoing concern of landowners which many associated with unrestrained freedom camping. The Climate Change Strategy has clearly identified that Banks Peninsula will be at a greater risk from fire due to the increased droughts expected under climate change. Drought conditions already prevail with little rain since 2020 and water shortages in communities such as Akaroa and Duvauchelle. Fire presents a huge threat to biodiversity on Banks Peninsula.

The Covid-19 pandemic has demonstrated that having fewer visitors who spend more is much better for communities and the environment. It has also shown how much people in Christchurch enjoy getting out walking and cycling and exploring their back yard.

The moment is right to harness Banks Peninsula as a place for environmental education through low-carbon activities.

Our specific funding requests are:

5.1 Re-instate funding for Enviro-schools

Encouraging young minds to be more environmentally conscious and aware is critical to our society's ability to survive the climate crisis ahead. We are therefore taken aback to see that the small amount of funding, \$50k per annum, allocated to the Enviro-schools programme, is to be discontinued.

This cut is a mistake. The Enviro-schools programme not only needs to be maintained, it needs to be increased. We ask that the funding is reinstated and increased to at least \$100k per annum.

5.2 Support Orton Bradley Park

We understand that Orton Bradley Park receives a small annual grant from the Council. We ask that this is increased to enable the park to remove its gate entrance fee. The gate fee is currently essential to help the Park cover its operating costs, but it acts as a barrier to some visitors, and there are costs associated with its collection.

Orton Bradley Park will provide the future gateway to the new Te Ahu Pātiki park. The Trust believes that free public access to this new park using the existing tracks through Orton Bradley Park will encourage more people from Christchurch to visit Te Ahu Pātiki.

Orton Bradley Park provides a superb low-carbon recreational resource to the people of Christchurch, with its low-cost camping areas, walking tracks, mountain biking for kids and protected stream for them to play in.

Although it is owned and managed by a private trust, the land is protected in perpetuity for public benefit, and we would like it to have free access in the same way as for the regional parks provided by the Council.

We suggest that its current grant is increased by \$40k per annum to enable the gate fee to be withdrawn.

5.3 Support Te Pātaka o Rākaihautū/Banks Peninsula GeoPark Trust

Te Pātaka o Rākaihautū/Banks Peninsula GeoPark is a new initiative supported by the Trust and many other groups and agencies. Its aim is to promote Banks Peninsula as a slow tourism destination by providing in depth and interesting information to the public at a series of Geosites and GeoTrails – and to interpret how

the geology underpinning each site has affected the biodiversity that has subsequently developed there, and the human cultures layered on top.

The Rod Donald Trust has granted seed funding to the GeoPark Trust to create the first GeoSite at Governors Bay this year. That seed funding has been augmented by a further grant from the Rata Foundation.

We suggest that Christchurch City Council gets behind the GeoPark initiative with a grant of at least \$50k per annum for the next 10 years to cover basic costs for ½ FTE and enable the Trust to roll out its programme. This will help make Banks Peninsula a more popular slow tourism destination.

6 Conclusion

The Climate and Ecological Emergency has been recognized at both the national level and by Christchurch City. It is indeed an emergency, because if we do not make huge changes to our behavior and priorities, the planetary eco-systems supporting life as we know it are going to change drastically and for the worse. We must take drastic action now to make such changes in the short window left to limit global heating.

The Climate Change Commission has made it clear that work must start now to achieve the transformational and lasting change need across society and the economy. Harvesting the low hanging fruit on Banks Peninsula presents Christchurch City Council with a win-win for biodiversity, climate change and the economy.

We seek funding and recognition for the role that Banks Peninsula can play if the regulatory and incentive framework shifts towards one of accelerating regeneration and building community engagement. We are calling on Christchurch City Council to begin the immediate implementation of Programme 5 in its Climate Change Strategy through minor changes to its LTP.

The only thing stopping Banks Peninsula becoming cloaked once again in native forest is human activity. With appropriate support from Christchurch City, a shift from pastoral farming and exotic forestry to native forest regeneration on marginal land could be rapidly achieved and on a landscape scale on both private and public land.

The Peninsula is situated close to the majority of the Canterbury population. This proximity presents an incredible opportunity to achieve the transformations sought in the Climate Change Strategy. Underpinning this is the Council's increased support for the Peninsula's regenerating native forests via regional conservation parks that have enduring public access, along with improved funding for community groups who provide, manage and maintain public conservation areas. Public education and support for their health and wellbeing are key social outcomes of these transformations.

We ask that the climate change lens is re-applied to the LTP and funds are reallocated so that the potential of Banks Peninsula to assist the City with its climate change goals can be realized. Banks Peninsula provides the ideal place to accelerate regeneration of the natural environment combined with building community engagement and action in a cost-effective manner.

We wish to be heard in support of our submission.



11 September 2020

To Whom It May Concern:

LETTER OF SUPPORT – ROD DONALD BANKS PENINSULA TRUST TE AHU PĀTIKI PURCHASE

The Banks Peninsula Community Board fully supports the purchase of Te Ahu Pātiki by the Rod Donald Banks Peninsula Trust which plans to create a conservation park, with full public access, to protect and restore native biodiversity.

The purchase of this land by the Trust will secure public access on Te Ara Pātaka, the Ōtautahi to Akaroa tramping network, providing additional opportunities for walking and mountain biking, including new access to the Mt Bradley summit.

It will also fill a gap to create 1700ha of continuous land protected for biodiversity, fulfilling a goal of the Banks Peninsula Conservation Trust's Ecological Vision. The natural regeneration of the land will protect the Te Wharau stream from summit to sea and improve water quality in the Te Waiake stream, thus also supporting the vision of Whaka Ora – Healthy Harbour, the Lyttelton catchment management plan.

The outstanding achievements to date of the Rod Donald Banks Peninsula Trust, working in partnership with a number of like-minded organisations, have proven its expertise in the valuable work it does protecting and restoring land and encouraging both locals and tourists to enjoy access to the stunningly beautiful Banks Peninsula playground.

The Board is delighted to support this project which will provide enormous benefit to the environment, further opportunities for the adventurous and multiple advantages for local communities.

If you have any questions about this letter please do not hesitate to get in touch.

Yours faithfully



Tori Peden

Chairperson
Banks Peninsula Community Board

Akaroa Service Centre

Harry Ell Summit Road Memorial Trust

Leave a lasting legacy for future generations to enjoy the Port Hills.



8 July 2020

John Goodrich

Harry Ell Summit Road Memorial Trust

Dear Trustees of the Rod Donald Banks Peninsula Trust

We were delighted to hear that you are negotiating for the purchase of Loudon Farm including the summits of Mt Bradley and Mt Herbert.

Harry Ell dreamed of a route between Gebbies Pass and Hilltop. Te Ara Pātaka is the fulfilment of this dream. Loudon Farm is the last remaining section of Te Ara Pātaka held within private ownership. Its purchase would ensure that public access to this historical route is protected for future generations and that this land can be managed for biodiversity purposes, restoring our native vegetation, birds, lizards and invertebrates.

The Harry Ell Summit Road Memorial Trust was set up in 2002 to further the work of the Summit Road Society and in particular to ensure Harry Ell's vision for protecting and preserving the Port Hills and providing for public access.

We are pleased to pledge a donation of \$5000 towards the purchase of Loudon Farm. The Harry Ell Summit Road Memorial Trust sees this purchase as a once in a lifetime opportunity. It will fulfil Harry Ell's vision for the Port Hills and Banks Peninsula and enable the creation of a contiguous corridor of 1700ha of protected land. We commend the Rod Donald Banks Peninsula Trust for your work in getting to this point.

We are in full support of this purchase and hope that our pledge will assist in making this vision a reality.

Regards,

A handwritten signature in blue ink that reads "J Goodrich".

John Goodrich
Chairperson

Banks Peninsula Water Zone Committee

Suky Thompson
Manager
Rod Donald Banks Peninsula Trust

Dear Suky

At the 21 July 2020 Banks Peninsula Zone Committee meeting, the Committee agreed to endorse the Te Ahu Pātiki project led by the Rod Donald Banks Peninsula Trust.

The Zone Committee supports the Trust in its application for funding to assist with the land purchase and other costs.

The full text of the minutes on this item are below:

- 11. Te Ahu Pātiki Project Led by the Rod Donald Banks Peninsula Trust**
- 1.1 At the Committee's 30 June 2020 workshop a presentation was given by members of the Rod Donald Banks Peninsula Trust about the Te Ahu Pātiki project for creation of a conservation park in the upper Te Wharau catchment basin and part of the Te Waiake catchment.
- 1.2 The Trust requested the support of the Zone Committee, and of the Trust's application for funding to assist with the land purchase and other costs related to this project.

Committee Resolved BPZC/2020/00018

That the Banks Peninsula Water Management Zone Committee:

1. Endorses the Te Ahu Pātiki project led by the Rod Donald Banks Peninsula Trust to secure the upper Te Wharau catchment basin between Mt Herbert/Te Ahu Pātiki and Mt Bradley and part of the Te Waiake catchment, to create a conservation park for public benefit and withdrawing grazing cattle. (Refer Note 1)
2. The Zone Committee supports the Trust in its application for funding to assist with the land purchase and other costs. (Refer Note 2)
Note 1: The project aligns well with progress towards the Zone Committee's outcomes for Ki Uta Ki Tai, improved water quality, enhanced biodiversity and reduced sedimentation. It will help deliver the Whakaraupō/Lyttelton Harbour Catchment Management Plan.
Note 2: The Zone Committee anticipates it may become more directly involved in the project once the land has been secured, for example if catchment planting or other biodiversity protection and enhancement actions are identified in the resulting management plan.

Paula Smith/Dr Benita Wakefield **Carried**

The Zone Committee wishes the Rod Donald Trust well with this project. Please keep the Committee informed of significant progress such as once the land has been secured. Please

Banks Peninsula Water Zone Committee

get in touch with the Committee when we can be of more assistance or if you have any questions.

Ngā mihi,



Dr Benita Wakefield
Chairperson, Banks Peninsula Zone Committee

*The Banks Peninsula Water Zone Committee is a
community led committee supported by councils.*

 [fb.com/canterburywater](https://www.facebook.com/canterburywater)

Christchurch
City Council 

 **Environment
Canterbury
Regional Council**
Kaunihera Taiao ki Waitaha



a passion for the Port Hills

Summit Road Society

13 July 2020

Dear Trustees of the Rod Donald Banks Peninsula Trust,

We are writing to affirm our support for the proposed purchase of Loudon Farm, including the summits of Mt Bradley and Mt Herbert.

The Summit Road Society was formed in 1948 to further the vision of Harry Ell to protect and preserve the Port Hills and to provide for public access. Our Mission Statement is "Working to enhance, preserve and protect the natural environment, beauty and open character of the Port Hills of Banks Peninsula for people to enjoy".

We own four reserves on the Port Hills. Our focus is on providing opportunities for recreational access and protecting and enhancing the native biodiversity of our reserves through planting, native regeneration and weed, pest and predator control. We also lead a large community project Predator Free Port Hills which aims to eradicate predators from the Port Hills by 2050.

John Jameson founded the Summit Road Society in 1948. John's grandfather, Harry Ell, dedicated much of his life to preserving the last remnants of native bush on the Port Hills and establishing rest houses for those walking along the Summit Road. Harry Ell dreamed of a route between Gebbies Pass and Hilltop. He walked this route, as did many others from Christchurch staying at the Sign of the Packhorse and tramping onwards to Akaroa. A road was never completed and the route became essentially impassable. However, in 2016, Te Ara Pātaka, the Summit Walkway, was opened. We see this route as the fulfilment of Harry Ell's vision. The purchase of Loudon Farm would ensure public access for the last remaining section of private land on the Te Ara Pātaka walkway. Most importantly, this access would be protected for future generations.

The Board of the Summit Road Society supports and endorses this purchase. It fulfils Harry Ell's dream for public access across Banks Peninsula and the Port Hills. It is a rare opportunity to acquire a further 500 ha and, in turn, create a contiguous corridor of 1700 ha of protected land. It will also provide a link from the iconic Sign of the Packhorse down into Charteris Bay (Orton Bradley Park). We see this new reserve as key to achieving our vision of a Predator Free Port Hills and, in turn, Pest Free Banks Peninsula.

The Society's finances are committed to the maintenance and protection of our reserves and to Predator Free Port Hills. Nonetheless, we view this purchase as a once in a lifetime opportunity. We therefore asked the Harry Ell Summit Road Memorial Trust to make a donation towards the purchase. We are delighted that the Trust has pledged to donate \$5000.

We wholeheartedly support your efforts to acquire this property.

Yours sincerely,

Bill Woods
President



13 July 2020

Suky Thompson
Manager
Rod Donald Banks Peninsula Trust

Kia ora Suky,

Endorsement of the Te Ahu Pātiki project

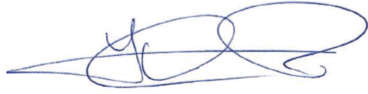
On behalf of the Whaka-Ora, Healthy Harbour Governance Group, we would like to endorse the Te Ahu Pātiki project led by the Rod Donald Banks Peninsula Trust.

The project will secure the high slopes, summits and gully heads of Te Ahu Pātiki/Mt Herbert and Mt Bradley as a conservation park for public benefit and biodiversity enhancement. Grazing cattle will be withdrawn to facilitate natural regeneration of native biodiversity and improve stream health for the upper catchment basin of Te Wharau stream and part of the Te Waiake catchment. Public access on the Te Ara Pātaka/Summit Walkway will be secured.

The project will result in ki uta kit tai (summit to sea) protection for the Te Wharau stream, as below the Te Ahu Pātiki block it is already protected through neighbouring Orton Bradley Park until it reaches the sea. Stock are excluded from the stream through the park and side catchments protected by QEII covenants.

Whaka-Ora, Healthy Harbour strongly supports the Trust in its applications for funding to assist with the land purchase and other costs, as this projects actions several of our key focus areas, including Erosion and sedimentation, Pollution (through stock removal), Terrestrial Indigenous Biodiversity, and Marine Indigenous Biodiversity (through cleaner streams).

Nga mihi nui



Yvette Couch-Lewis
Co-Chair, Whaka-ora, Healthy Harbour



Roger Gray
Co-Chair, Whaka-ora, Healthy Harbour

On behalf of Whaka-Ora Healthy Harbour Governance Group:

Cr Andrew Turner, Christchurch City Council
Cr Lan Pham, Environment Canterbury
Trudy Heath, Te Rūnanga o Ngāi Tahu

TE HAPŪ O NGĀTI WHEKE INCORPORATED

12 June 2020

Rod Donald Banks Peninsula Trust
c/o Richard Suggate

Tēnā koe Richard

Re: Purchase of part of Loudon Farm

Te Hapū o Ngāti Wheke understands the Rod Donald Banks Peninsula Trust is proposing to purchase upper parts of Loudon Farm for the purpose of creating a park and removing stock to encourage indigenous vegetation regeneration.

We also understand the land the Trust intend to purchase includes the northern faces and summits of Te Ahu Pātiki, a maunga that has a long historic association with our people. Given this significance we would like to support the project by agreeing to you using the name *Te Ahu Pātiki* for the park. This will be fitting given your initiative will help us work together to restore the mana and the mauri not only of Te Ahu Pātiki itself but also its connection to Whakaraupō.

Given our intergenerational relationship with this land, we know that questions of long-term protection and ownership are also important. We would therefore note at this time our serious concerns at the idea of handing control of the land to CCC or DOC, and we would want to work in partnership with you to determine a long-term ownership model that would best protect the mauri of Te Ahu Patiki.

We look forward to continuing to build our long-term working relationship with you, led by the Chair of our Natural Resources Portfolio, Yvette Couch-Lewis, who we know will represent the interests of our hapū well.



Manaia Rehu
Chair, Te Hapū o Ngāti Wheke Inc

#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
31	39590	Suky	Thompson	Rod Donald Banks Peninsula Trust	Manager		Yes



Submission to

Christchurch City Council
Draft Development Contributions Policy 2021
From Rod Donald Banks Peninsula Trust

Contact details: Suky Thompson, Trust Manager,

Postal address:

We wish to be heard in support of our submission.

The Rod Donald Banks Peninsula Trust is a Christchurch City Council controlled organisation founded in 2010 for the benefit of Banks Peninsula/Te Pātaka o Rākaihautū residents and visitors.

The Trust is concerned about some aspects of the Draft Development Contribution Policy 2021.

1. Reserves Development Contribution
 - a. We wish the Development Contribution for Reserves to continue. The Trust supports the addition of more Regional parks to the Christchurch City Council portfolio to act as carbon sinks.
 - b. We note that in the 2018 LTP, increasing the land area of Regional Parks in line with population growth was a core KPI in the service plans. Our understanding is that the Development Contribution provides a way for funding for new parks to keep pace with population growth.
 - c. We do not support the limits on the amount of reserves development contribution. This should be related to the value of the new subdivision created. Reserves are an increasingly important service given their value for carbon sequestration and low carbon activities.
2. We suggest that assessing all non-residential activities as 1 HUE regardless of scale or land-use is inappropriate – non-residential activities should need to contribute based on their impacts or likely impacts and demands on services
3. We request greater clarity around which sites Development Contributions apply to. It is unclear from the draft policy whether properties that do not receive a service will be charged. This is of particular concern for the Akaroa Harbour catchment area where levies are to increase substantially.
 - a. We have made enquiries with staff and been informed that this is covered by section 2.2.6.
 - b. We request this is reworded to make it clear. At present our reading of this clause is that a property in Akaroa Harbour would be assessed for the Development Contribution for water supply and wastewater because it would be in an area that is serviced.
 - c. The wording should be change to state:
 - i. ~~A development outside the areas serviced~~ **A property that is not able to connect to the service** for one or more of water supply, wastewater collection, and wastewater treatment and disposal will not be assessed for development contributions for a non-serviceable activity. If the property is able to connect to the network in the future, it will be assessed for a development contribution for the relevant activity at that time.
4. We are concerned about the proposed level of increase for Development Contributions in the Akaroa Harbour
 - a. The Trust recently carried out a subdivision in the Akaroa Harbour area as part of a project to secure enduring public access on a walking track critical to linking together the Akaroa walking network.

- b. As part of the subdivision process, public access to the track was protected by way of an easement with the Council and the native forest on the property protected in perpetuity with a covenant. The Trust constructed a new route for the track through this forest.
- c. Despite the public amenity created the Trust was charged a Reserves Development Contribution.
- d. When we challenged this on the basis that we had created the equivalent to a reserve, the Regional Parks Team paid the bill instead. We felt this was counter-productive. The fee should have been waived – not charged to the Parks team when a new Park asset had been created by us as the developer.
- e. We reviewed the Development Contribution Policy carefully at the time and concluded that the process of assessing public benefit of our project had not been handled in the manner set out in the policy.
- f. While we were not motivated by profit for our subdivision project, the costs of carrying it out were very high, and the process onerous. We would expect private individuals or organisations carrying out subdivisions that have a public benefit aspect to be able to do so and still make a profit on their work.. We are therefore concerned that increased fees proposed may cause perverse incentives.
 - i. Although the project we have referred to was in the rural zone, and therefore the new fees might not apply, a similar project that created public amenity within a serviced area would be hit with the very high new fees.
 - ii. The Council must take care that developments that have a public benefit are not stymied from occurring because the Development Contributions have become too high.