

**From:** Environment Canterbury  
**To:** [Mailroom Mailbox](#)  
**Subject:** Proposal for the Canterbury RPMP Plan [#42]  
**Date:** Monday, 3 July 2017 10:00:10 a.m.

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Organisation (the organisation that this submission is made on behalf of, where applicable)	Township Committee of Castle Hill Village, representing the Castle Hill Community Association
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Contact name and postal address for service of person making submission (if different from above)	If Robert Murfitt is unavailable to be heard in support of this submission, this task will be delegated to another member of the Township Committee
Please tick those that apply	<input checked="" type="checkbox"/> I do wish to be heard in support of my submission; and if so,
Your submission on the Proposal for the Canterbury Regional Pest Management Plan	Our submission is attached, as advised by Customer Services

Attach any supporting documents here.



[chvca\\_final\\_submission\\_3\\_july\\_2017.pdf](#)  
71.27 KB · PDF

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**TO: ENVIRONMENT CANTERBURY**  
**FROM: CASTLE HILL VILLAGE COMMUNITY ASSOCIATION**  
**(TOWNSHIP COMMITTEE)**

**SUBMISSION ON THE PROPOSED REGIONAL PEST MANAGEMENT PLAN**

**Introduction**

1. This submission has been prepared on behalf of the Township Committee of the Castle Hill Village Community Association. The Village is located in the Castle Hill Basin of the Canterbury high country adjacent to SH73 in Selwyn District.
2. Castle Hill Village currently has more than 200 residential sections, with in excess of 100 dwellings constructed on them and occupied.
3. This submission focuses specifically on the future management of certain tree species.

**Summary**

4. We agree with the purpose of the proposed Regional Pest Management Plan (RPMP) as stated in Section 1.2 and with the Objective 4 of the proposed Plan as stated on p.35.
5. In our view, the RPMP as currently proposed has ignored the existence of areas of residential settlement in the high country (of which Castle Hill Village is but one; others being Coleridge Village, Mount Lyford Village, Hanmer Springs).
6. Castle Hill Village has had its own 10-year Reserves Management Plan (RMP) since 2011, which has already been effective in reducing the numbers of p. contorta in the Village reserves over recent years
7. This Reserves Management Plan is currently being reviewed by the Village. As part of this review, the community of Castle Hill Village has already agreed to the elimination of p.contorta from the Village reserves - it was never planted there in the first place.
8. The Castle Hill RMP provides: *"Wilding Source: The spread of wilding trees is a significant issue for the village, village surrounds and the wider Castle Hill - Craigieburn - Flock Hill area generally. The most wilding prone species is Pinus contorta (Lodgepole pine), while others with some spread are Douglas Fir and larch. For the village reserves, management should comprise progressive removal of all contorta, lessening of Douglas Fir numbers, the locating of any retained wilding-prone species internally in planting areas so seed is not dispersed, and periodic inspections and clearance of wildings. As not all wilding sources are within the reserves it will be necessary to continue such management for the foreseeable future."*

9. Within the framework of the RPMP as currently proposed, including the specific rules, the definition of wilding conifers is too wide and does not allow for species which have been planted for amenity purposes in Village reserves and are being actively managed under the Village RMP.
10. By ignoring the particular circumstances of high country settlements, the rules-based approach as currently proposed runs the risk of creating perverse outcomes for our Village; that is, invoking the Good Neighbour Rule to impose a landscape and amenity outcome rather than a pest management outcome.
11. We request that a duly revised Village Reserves Management Plan continue to be the primary instrument for managing wilding tree species in the Village, assuming that such revision -
  - (a) aligns the Village Plan with the purpose and objectives of the proposed RPMP; and
  - (b) includes an explicit Good Neighbour Rule<sup>1</sup> governing the pest management responsibilities as they relate to the relationship between the Village and its rural neighbour properties, specifically Castle Hill Station and the Department of Conservation.
12. With this in mind, we recommend that within residential settlement areas that have reserve areas with approved Reserve Management Plans that include a tree maintenance and management programme, wilding conifers be exempt from the Pest Management Plan provisions.
13. We suggest that by adopting our requested approach of working through the Village's own Reserves Management Plan, allows an appropriate institutional arrangement for the Village community, with accountability to the community and to the Selwyn District Council. It also creates the basis for a formal partnership between the Village and Environment Canterbury over the implementation of its RPMP that is appropriate both for this high country Village and its surrounds.

### **The proposed RPMP - wilding tree provisions**

14. We agree with the purpose of the proposed Plan as stated in Section 1.2 -

*“• minimise the actual or potential adverse or unintended effects associated with those organisms; and*

*• maximise the effectiveness of individual actions in managing pests through a regionally coordinated approach.”*

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<sup>1</sup>

As defined in the RPMP Glossary on p.99 and acknowledging specified criteria.

and with the Objective 4 of the proposed Plan as stated on p.35 -

*“Over the duration of the Plan, progressively contain and reduce the geographic distribution or extent of wilding conifers<sup>2</sup>, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch within the Canterbury region to prevent adverse effects on economic well-being and the environment.”*

15. The current focus of the RPMP does not distinguish between the issues for open, unoccupied high country land (DoC estate and private runholder properties) and the issues for residential settlements in the high country. However, the Plan does acknowledge some situations where exotic conifers have been planted deliberately - *“areas of production forests, erosion control plantings, shelter belts, amenity plantings.”* (p.32) Allowance for amenity plantings of certain conifer species within public reserve areas and private sections of established residential settlements has not been similarly acknowledged.
16. Rules that may be appropriate for the extensive high country estate (e.g. Rules 6.3.1 and 6.3.2 on pp.35 and 36) will have perverse effects if applied in a settlement area. For example, proposed Rule 6.3.2 could see all amenity plantings of conifers removed from the Village reserves<sup>3</sup>, and possibly in a very short time frame, without any requirement for consulting the community.

### **The context of Castle Hill Village**

17. Castle Hill Village was planned and implemented in the late 1970s as an alpine village with special character, including a written consent requirement to plant 6070 exotic species as part of the development.
18. Trees, including exotic trees, provide a range of amenity values in the Village: shade, wind protection, play areas for children, important for village bird life, and visual attractiveness. Anyone familiar with Castle Hill Village will know the landscape contribution of the larch trees, particularly in autumn. This is a totally different situation from the extensive high country estate.
19. Unlike almost all the extensive high country, Castle Hill Village has active reserves management in place, underpinned by the Reserves Management Plan adopted in 2011. This plan is overseen by the Selwyn District Council, and has already been active for five years in removing p.contorta and replacing with beech and other plantings.

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<sup>2</sup> Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 4 (page 16) established by natural means, unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land than the forest plantation that it is a part of.

<sup>3</sup> These are Selwyn District Council-designated reserves that have been planted expressly for amenity purposes and are actively managed.

20. The Village community has already agreed to the phased elimination of *p. contorta* over a time-frame that is currently under consideration, and well within the 10-year time-frame envisaged by the proposed RPMP. Furthermore, it has long been accepted by Village property owners that all trees in Village reserves require active management over time in order to optimise their amenity values.
21. The Reserves Management Plan is currently being reviewed by the Village. This will provide the opportunity not only for community consultation within the Village, but also to ensure that the Village RMP aligns with the proposed RPMP in terms of the latter's purpose and objectives, and cognisant of the level of risk associated with wildings in the Village.

### **Our submission**

22. We request that a duly revised Reserves Management Plan continue to be the primary instrument for managing wilding tree species in the Village, assuming that such revision -
  - (a) aligns the Village Plan with the purpose and objectives of the RPMP; and
  - (b) includes an explicit Good Neighbour Rule<sup>4</sup> governing the pest management responsibilities as they relate to the relationship between the Village and its rural neighbour properties, specifically Castle Hill Station and the Department of Conservation.
23. With this in mind, we recommend that within residential settlement areas that have reserve areas with approved Reserve Management Plans that include a tree maintenance and management programme<sup>5</sup>, wilding conifers be exempt from the Pest Management Plan provisions.
24. Specifically, we submit -
  - a. that footnote 3 on page 15 and footnote 12 on page 35 be amended to read: "*Wilding conifers are any introduced conifer tree that has been declared by Ecan to have a significant risk of spreading, including ....*"
  - b. that Plan Rule 6.3.1 be amended by adding a subclause (c) *That amenity planting within council controlled reserves not be subject to this rule provided that there is a reserves management plan that:*
    - (a) *aligns the Village Plan with the purpose and objectives of the RPMP; and*
    - (b) *includes an explicit Good Neighbour Rule<sup>6</sup> governing the pest management responsibilities as they relate to the relationship between the area covered by the plan and its rural neighbouring properties*

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<sup>4</sup> As defined in the RPMP Glossary on p.99 and acknowledging specified criteria.

<sup>5</sup> i.e. a programme that includes containment and control of wilding spread to properties neighbouring the Village.

<sup>6</sup> See Footnote 4.

- c. that Plan Rule 6.3.2 be amended by adding *except that any reserve subject to clause (c) of Rule 6.3.1 shall be exempt from this rule*
25. We suggest that by adopting our requested approach of working through the Village's own Reserves Management Plan, allows an appropriate institutional arrangement for the Village community, with accountability to the community and to the Selwyn District Council. It also creates the basis for a formal partnership between the Village and Environment Canterbury over the implementation of its RPMP that is appropriate both for this high country Village and its surrounds.

Note: As a supporting document for this submission, we wish to include the existing Castle Hill Village Reserve Management Plan. Given the size of the document itself and the size of the electronic file, we give effect to this by providing the following web address - <http://www.selwyn.govt.nz/council/plans/reserve-management-plans>

Robert Murfitt  
Chair, Castle Hill Village Community Association  
3 July 2017