To whom it may concern

I wish to submit to the Draft Environment Canterbury Pest Management Plan

Pam Richardson
‘Balcarres’
Pigeon Bay
Banks Peninsula
29th June 2017

I wish to be heard

The specific provisions of the Draft Plan that my submission relates to:

- Section 4.1 Organisms declared pests
- Section 6.2 Pests to be managed under eradication programme

I submit that feral goats be identified as a pest for Banks Peninsula and addressed accordingly with an appropriate programme to ensure we can continue to eradicate the remaining goats and monitor for any further outbreaks across the whole Peninsula.

I own and operate in partnership with my husband Ian and son Andrew a 670ha Banks Peninsula sheep and beef hill country property in Holmes Bay Pigeon Bay.

An independent report has identified over 33% of our property [138 ha] as having significant indigenous vegetation in 15 identified sites with extensive corridors connecting all of these areas.[An extract is attached]

The Christchurch City Council in the District Plan Review has identified 2 sites [150ha] as significant ecological sites.[An extract is attached]

Our indigenous vegetation is of high value for environmental and productive values - healthy land healthy stock healthy people.

We live work and play in our ‘spot’ in Banks Peninsula and are looking for support to eradicate those last few goats from Banks Peninsula.

The Environment Canterbury Regional Policy Statement significant indigenous vegetation criterion only needs one plant to be identified as significant. This is an extraordinarily high ‘catch all’ criteria and means that on our property every area is significant and therefore this indicates that perhaps the entire ‘bush cover’ on Banks Peninsula is of significant ecological value.
Environment Canterbury already recognises Banks Peninsula as a high value area. During the recent CCC District Plan Review we personally heard Environment Canterbury’s planning team ecologists etc. talking about the significance of the Banks Peninsula vegetation. The Department of Conservation along with other agencies also continually ‘rollout’ this same statement.

Banks Peninsula has a long history of goats and damage to indigenous vegetation. Throughout the extensive survey as part of the Protected Natural Areas Programme [carried out in the late 1980’s by Hugh Wilson for the Department of Conservation] goats were recorded in many of Hugh’s report cards. In 1988 a call went out to set up a community group to eradicate goats. [see add calling for support for a community programme 1988]

More recently we have had a Bank Peninsula goat working group –a partnership between Environment Canterbury, the Banks Peninsula Conservation Trust, the Department of Conservation and the Christchurch City Council. I have been involved with the Banks Peninsula Goat Eradication Programme including the development of the strategy prepared by Landcare Research in 2005 and continue to be a member of the working group today.

The programme has been successful in that over 5000 goats have been eradicated over the last ten years at a cost of over $300,000. Considerable numbers of ‘volunteer man hours’ have also contributed. Including goats in the Regional Pest Management Plan would be an indication that ‘we mean business’.

The Department of Conservation states that the Wild Animal Control Act is almost completely unenforceable and they do not have the resources to implement this except in a very extreme situation. This cannot be relied on as a broad solution for the small number of properties with feral goats.

The reality is if we are to going to get rid of goats we need the policies and tools to support the eradication of goats right now. We cannot afford to lose any more ground.

The majority of landowners are aware of and support the programme e.g. by allowing trained shooters on to their land; they understand the importance of reporting where the goats are.

Landowners do understand the reasons behind eradicating the goats.
The goat working group know where the remaining feral goats have been observed – in the remaining pockets in discrete areas across the Peninsula. The recent fires have also dispersed goats around the city boundary.

As a member of the goat working group and along with many others we have given many hours to supporting the goat programme. If it is required to set up another Community Initiated Programme, going through extensive consultation to achieve the required outcome will not be easy to achieve. I was involved with the earlier possum programme and the effort that we made was considerable and very time consuming. We would need to lead the process and have engagement with landowners a number of meetings and a submission process etc. There may not be the ‘buy in’ required.

We need to build on the programme we already have in place. The earthquakes and fires etc. have impacted the work programmes over recent year’s. This year’s programme with funding from the DoC, Environment Canterbury and the CCC has managed to almost clear the Kaituna area. A report of this year’s operation will be available shortly.

We need these focused programmes to continue and to ensure what has been achieved is not lost.

Pam Richardson
iprichardson@xtra.co.nz

Attached Info re ‘Balcarres’

- Montage of photographs
- Banks Peninsula Ecological Significance Assessment Report
- Christchurch District Plan Site of Ecological Significance H/26 and H/27
Property Number/Name: Balcarres

Landowner(s)/Occupier(s): Pam and Ian Richardson

Ecological District: Herbert
Shanks

Surveyed by: Geoff Walls, Carol Jensen & Alice

Date: 26 November 2008

Number of Significant Sites: 15
SIGNIFICANT ECOLOGICAL SITES

15 sites of natural significance can be identified on this property. The property has indigenous character elsewhere as well - including small bush pockets, scattered shrubs, elegant treelands and tussock grasslands - so the concept of significant ecological sites is a bit blurred. The sites described below therefore represent the best of the natural values, but should not be thought of as containing them all, or as having hard and fast boundaries.

Site 1 Outcrop, GR N36/996275 (E2499580 N5727540), c.3ha.
Site 2 Maori Gully-Wild Cattle Hill, GR N36/987268 (E2498700 N5726800), c.80ha.
Site 3 Fragrant Tree Daisy, GR N36/003268 (E2500280 N5726800), c.45ha.
Site 4 Roadside, GR N36/988226 (E2498845 N5725870), c.3ha
Site 5 Bull Paddock Gully, GR N36/995226 (E2499515 N57225820), c.5ha
Site 6 SW Gully A, GR N36/987255 (E2498730 N5725510), c.6ha
Site 7 SW Gully B, GR N36/987250 (E2498740 N5724960), c.6ha
Site 8 SW Gully C, GR N36/989249 (E2498895 N5724925), c.5ha
Site 9 SW Gully D, GR N36/990246 (E2499190 N5724760, E2498880 N5724510), c.6ha
Site 10 SW Gully E, GR N36/990242 (E2499020 N5724215), c.3ha
Site 11 Wetland, GR N36/989249 (E2499305 N5724650), c.0.3ha
Site 12 Eastern A, GR N36/997248 (E2499690 N5724800), c.0.7ha
Site 13 Eastern B, GR N36/001246 (E2500120 N5724560), c.4 ha
Site 14 Eastern C, GR N36/006251 (E2500580 N5725080), c.7ha
Site 15 Eastern D, GR N36/007255 (E2500070 N5725500), c.7 ha
Site name: Wild Cattle Hill and Maori Gully

Site number: SES/H/26

Physical address of site: Holmes Bay Valley Road, Pigeon Bay

Summary of Significance:

The site is significant because it contains a diverse range of representative indigenous vegetation communities, some of which are rare at the ecological district and Level 4 land environment scales. It is a large example of lowland-montane indigenous forest in the ecological district and has basic igneous bluffs, scarps and rock outcrops and volcanic boulderfield ecosystems which are originally rare ecosystems. It supports a diverse range of plant taxa including six nationally At Risk plant species, several plant species that are uncommon within the ecological district or region and one that is at its distributional limit. It provides important habitat for a range of indigenous fauna and is part of an important network of habitats and provides a seasonal food source for some bird species.
Additional Site Information

Ecological District: Herbert

Area of SES (ha): 109.2

Central point (NZTM): E1588723, N5165012

Site Description

The site is located between Pigeon Bay and Port Levy on the main ridgeline and upper eastern slopes and gullies above Holmes Bay. It includes the basin-like head of Maori Gully, Wild Cattle Hill and the spurs and gullies in between. The altitudinal range of the site is from approximately 220 to 600 m above sea level. 27.4 ha of the head of Maori Gully is protected by the Maori Gully Banks Peninsula Conservation Trust (BPCT) covenant.

The main vegetation communities within the site (Walls et al. 2008) are:

- (Lowland totara-thin-barked totara-matai)/mixed broadleaved-hardwood forest and treeland on lowland and montane slopes and gullies
- Indigenous small-leaved shrubland on lowland and montane slopes
- Rock bluff, outcrop and boulderfield communities
- Silver tussock grassland.

The following description of the site is from Walls et al. (2008).

The head of Maori Gully contains diverse second-growth broadleaved-hardwood forest dominated by lowland ribbonwood (*Plagianthus regius*), narrow-leaved lacebark (*Hoheria angustifolia*), mahoe (*Melicytus ramiflorus*), broadleaf (*Griselinia littoralis*), kaikomako (*Pennantia corymbosa*), kowhai (*Sophora microphylla*) and tree fuchsia (*Fuchsia excorticata*) with a few emergent remnant podocarp trees (totara () thin-barked totara (*Podocarpus cunninghamii*) and matai (*Prumnopitys taxifolia*). The indigenous vegetation within the BPCT covenant has ferns, shrubs and tree seedlings that are regenerating in the undergrowth.

East of Maori Gully is an elevated volcanic rock outcrop. It has bluffs with columnar jointing and an extensive boulderfield of distinctly rounded boulders. The rock surfaces of the bluffs and boulders support complex lichen communities and some moss species. Amongst the boulders are a range of indigenous shrub and tree species.

Maori Gully and Wild Cattle Hill are connected by continuous forest and treeland along and below the main ridgeline. This is characterised by a diverse range of indigenous tree species such as lowland ribbonwood, narrow-leaved lacebark, mahoe, ngaio (*Myoporum laetum*), broadleaf, kaikomako and kowhai with a few totara.

There are shrublands around the forest edges and amongst the treeland, especially on the main ridge. These shrublands are comprised of *Coprosma virensens*, thick-leaved coprosma (*C. crassifolia*), round-leaved coprosma (*C. rotundifolia*), mikimiki (*C. propinqua*), *C. wallii* (bloodwood), niniao (*Helichrysum lanceolatum*), poataniwha
Site name: Northern Side of Holmes Bay
Site number: SES/H/27
Physical address of site: 98 Holmes Bay Valley Road, Pigeon Bay

Summary of Significance:

This site is significant because it contains representative lowland second-growth forest, treeland and shrublands and is a moderately large example of its type. Indigenous forest has been reduced to less than 20% of its former extent in the ecological district and region. The site has considerable habitat and species diversity and supports three nationally At Risk plant species, one of which is at its northern distributional limit on Banks Peninsula. It contributes to an important ecological linkage and is well buffered.
Additional Site Information

Ecological District: Herbert

Area of SES (ha): 47.0

Central point (NZTM): E1590412 N5165296

Site Description

The site is located on south and east-facing moderately steep to steep slopes and the head of a basin-like catchment on the northern side of Holmes Bay in Pigeon Bay. Part of the site extends over the rounded but rocky ridge on the western side of Little Pigeon Bay Road. The altitudinal range of the site is from approximately 100 to 300 m above sea level.

The main vegetation communities identified by (Walls et al. 2008) are:

- Mixed second-growth broadleaved-hardwood forest and treeland
- Kanuka forest
- Lowland small-leaved indigenous scrub and shrubland

The following description of the site is from Walls et al. (2008).

There is a small population - at least nine trees - of the nationally At Risk fragrant tree daisy (*Olearia fragrantissima*) in a localised area on the hillside in the south-western part of the site within characteristic second-growth tree-shrubland of kowhai (*Sophora microphylla*), ngaio (*Myoporum laetum*), narrow-leaved lacebark (*Hoheria angustifolia*), lowland ribbonwood (*Plagianthus regius*), rohutu (*Lophomyrtus obcordata*), weeping matipo (*Myrsine divaricata*), poataniwha (*Melicope simplex*), kanuka (*Kunzea robusta*), fierce lancewood (*Pseudopanax ferox*), *Coprosma virescens*, mikimiki (*C. propinqua*), and prostrate kowhai (*Sophora prostrata*).

There is kanuka forest in the lower gully with trees of lowland ribbonwood, narrow-leaved lacebark, ngaio, kowhai and kaikomako (*Pennantia corymbosa*), and a few secondary lowland totara (*Podocarpus totara*).

The upper gully contains secondary broadleaved-hardwood forest and treeland dominated by lowland ribbonwood, narrow-leaved lacebark, mahoe (*Melicytus ramiflorus*), kowhai, broadleaf (*Griselinia littoralis*) and kaikomako. This is fringed and intermingled with scrub and open shrubland composed of *Coprosma virescens*, *C. crassifolia*, *C. rotundifolia*, *C. propinqua*, niniao (*Helichrysum lanceolatum*), poataniwha, porcupine shrub (*Melicytus alpinus*), korokio (*Corokia cotoneaster*), weeping mapou and ongaonga (*Urtica ferox*). This shrubland extends up onto the ridge crest.

On steep rock and within thickets there are various small ferns, shrubs and tree seedlings. Vines include large-leaved pohuehue (*Muehlenbeckia australis*), scrub pohuehue (*Muehlenbeckia complexa*), bush lawyer (*Rubus* spp.), native jasmine (*Parsonsia* sp.) and yellow clematis (*Clematis foetida*).
Goats on Banks Peninsula

Wild goats have become widespread across Banks Peninsula in the last decade. They represent a major threat to the continued survival of the remaining native vegetation. We believe that Peninsula people and public authorities should face up to this deteriorating situation and reverse it.

An open letter...

Native vegetation on Banks Peninsula is represented now only by remnants - patches of original and second-growth bush and kanuka, scattered trees of totara, pastures, tussock and scrub here and there, and the unique assemblages of plants on rocky bluffs and cliffs.

These remnants are important to us all. They are part of our special landscape and our surroundings. They enrich our environment. They are a perpetual source of interest and delight waiting to be explored and discovered by each new generation.

They are also a resource. The plants and the wildlife they support not only provide firewood but also shelter for stock and protection of soil and water. Increasingly they will also be an important reason why other people come to visit the Peninsula (and spend their money here!).

Few threats to the survival of this native vegetation are currently as serious as that posed by wild and poorly farmed goats. Goats have been kept in a minor way on the Peninsula for many years, but the widespread farming and escape of these animals has taken place only within the last decade.

Everywhere in New Zealand (and elsewhere) where goats have gone wild they have wreaked havoc on native vegetation. They can end totally destroy forest by ring-barking mature trees and by arresting regeneration. They reach sites inaccessible to all other grazing and browsing mammals. Although they have food preferences, and although gose and broom are among their favourite, they consume a wide range of native trees, shrubs and herbs. Several plant species unique to Banks Peninsula are now, believe it or not, in serious danger of extinction. Many common ones such as ribbonwood, kowhai, mahoe and fivefinger are being widely damaged. Often the damage is done before it becomes obvious to most people. A recently completed botanical survey shows that the deterioration is reaching frightening proportions.

We are Canterbury and Peninsula residents, scientists, farmers, naturalists etc., who are deeply concerned at this loss of our heritage of Peninsula flora and fauna. We urgently want to increase awareness of the value of remaining and regenerating native vegetation, and the serious threat that goats pose to it.

We do not suggest restrictions on what animal farmer's can run on their own land, and we do not claim that responsible goat-farming has no place on the Peninsula. Goats can be difficult to confine with conventional fencing and now roam widely over other peoples' land, into plantations and over publicly and privately owned reserves. Forestry developments increasingly face added costs for essential goat control.

As weed eaters, goats are most useful when heavily stocked within well-fenced small blocks of scrub (20 to 30 hectares or less). Dispersed browsing across wider areas is at best minimally effective for weed control and can in the long run favour weedy species which, by their nature, thrive in disturbed conditions.

We believe that both individual efforts and community effort is needed promptly to remove feral and wild goats from the last natural values are unacceptable at risk. A great deal is at stake...

A local working group has been set up with access to people skilled in goat control, and the ability to organise control programmes at no cost to landowners.

For further information, ideas or help, phone Hugh Wilson at Akaroa (0514) 8501 or if there is no answer, at Christchurch 797-433.

Donations towards the cost of this advertisement will be gratefully accepted.
Good morning Pam,

Thank you for your prompt response. And I know it can be tricky with every online form you encounter being slightly different!

You might find it more convenient to write your submission in a separate document (for example on Microsoft Word) where you can save your progress, and attach the final version via the attachment field on our online form or send it in by email (PestReview@ecan.govt.nz).

Kind regards,
Lochiel

From: Pam Richardson [mailto:iprichardson@xtra.co.nz]
Sent: Thursday, 29 June 2017 5:35 PM
To: Lochiel McKellar <Lochiel.McKellar@ecan.govt.nz>
Subject: Re: Submission on the Proposal for the Canterbury Regional Pest Management Plan

Good evening. No it was my skills and I am now putting it in another way. I went away from the computer and lost what I had written. I will get my submission in asap. Kind regards Pam

Pam Richardson
03 304 6825 or 0274 478 551

On Thu, Jun 29, 2017 at 4:59 PM +1200, "Lochiel McKellar"<Lochiel.McKellar@ecan.govt.nz> wrote:

Good afternoon Pam,

Environment Canterbury would like to thank you for your interest in the Proposal for the Canterbury Regional Pest Management Plan and your submission.

I am writing in regards to your submission via our online form that was received this morning. I have attached a copy of the submission as we received it, and just want to alert you that an incomplete version may have been submitted. If you entered more text than what is shown please let me know so we can see if there is an issue with our online form. If the submission we received is complete then my apologies for taking up your time today.

You may submit again with additional material via our online submission form at www.ecan.govt.nz/pests, we are able to consolidate entries if they are a part of the same submission. Alternatively you may email your submission to PestReview@ecan.govt.nz.

Submissions close at 5pm on Monday 3rd July.

If you have any questions, or require any assistance please contact me.

Kind Regards,
Lochiel McKellar

2/07/2017
Lochiel McKellar
Planning Officer Hearings
Environment Canterbury

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Facilitating sustainable development in the Canterbury region