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**Sent:** Monday, 26 March 2018 12:18 p.m.  
**To:** Mailroom Mailbox  
**Cc:** Maree Burnett (BPCT)  
**Subject:** LTP submission  
**Attachments:** BPCT submission to ECAN LTP submission\_March 2018.pdf

Please find attached a submission from the Banks Peninsula Conservation Trust on ECAN's LTP.

We wish to attend the hearing.

Kind regards  
Maree



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## Environment Canterbury

### Consultation on the Long-Term Plan 2018 – 2028 and the Revenue and Financing Policy

#### Feedback Form

March 2018

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Submission by: Banks Peninsula Conservation Trust

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**We wish to be heard in support of this submission.**

#### Summary of Submission

The Banks Peninsula Conservation Trust (BPCT) congratulates ECAN on making indigenous biodiversity protection a strategic priority for Council and supports the intended step change in effort to achieve this. We support ECAN's emphasis on the critical role landowners play in achieving biodiversity protection in the region and welcome Council's intention to support capacity building of non-profit community-driven organisations to deliver improved conservation outcomes. Furthermore, the Trust supports the activities relating to pest control that contribute to the vision of a pest free Banks Peninsula proposed in the ECAN Long-Term Plan 2018 – 2028.

We specifically, encourage ECAN to implement the following:

- Substantially more funding available to landowners to protect indigenous habitat on private land both through the Immediate Steps fund and via an additional fund (e.g., Canterbury Biodiversity Strategy Fund) not limited to improvement of freshwater values.
- An ongoing annual investment of \$50k to increase the capacity of BPCT's habitat protection programme.
- A long term commitment to supporting a community-driven partnership approach to all pest control work on Banks Peninsula realised through the Pest Free Banks Peninsula and Port Hills Partnership (PFBPP).
- Financial support of a minimum of \$50k in year one available to the PFBPP to develop an over-arching strategy for Pest Free Banks Peninsula & collaborative operational work programme.
- A sustainable revenue stream to fund the expanded pest control work programme comprising a general rate allocation and targeted rate. We suggest:
  - 50% contribution from the general rate take, recognising the public good provided by Pest Free Banks Peninsula to the region.
  - 50% contribution from the expansion of the current Banks Peninsula Community Initiative Programme to include all properties in the entire Banks Peninsula Ecological Region, and the targeting of more pest species.
- A commitment to all ECAN pest control policy decisions and operational work being in alignment with the PFBPP over-arching strategy and work programme.
- An increase in funding to \$40k in year one to support the goals of the ongoing Goat Eradication Project.

#### Banks Peninsula Conservation Trust

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

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

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

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

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

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

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

All 8 Goals are interrelated and together contribute a significant improvement in the protection and enhancement of indigenous terrestrial, freshwater, and marine biodiversity on Banks Peninsula that align with the biodiversity priorities outlined in the Long-term Plan. We wish to bring the following aspects of BPCT's work towards achieving the Ecological Vision to ECAN's attention.

### **1. Habitat Protection and Enhancement Goals**

#### **a) Goal One – Protection of Old Growth Forest Remnants**

Old growth forests were already present when Europeans first reached Banks Peninsula and are characterised by having large trees, multi-layered canopies with gaps and coarse woody debris on the forest floor. Remnants of these forests (ca. 800 ha) have direct links to the original forests of the Peninsula and are important repositories for the full range of biodiversity: plants, birds, reptiles, invertebrates and soil biota. They are valuable sources for recolonization of regenerating forests across the Peninsula. Some form of protection is necessary to ensure that these remnants are permanently safeguarded, although there are a variety of ways this might be achieved (management agreements, covenant, purchase, reserve etc.). Exclusion of grazing is also essential to sustain what is still present, to avoid ongoing damage to soils and to allow for recovery, including regeneration of canopy trees.

#### **b) Goal Two – Protection of Rare Ecosystems**

While forest was the predominant vegetation type on the Peninsula before the arrival of humans, several other originally rare ecosystem types were also present on the Peninsula including terrestrial (cliffs, scarps, tors, dunes, coastal alluvium), freshwater (lakes, streams, wetlands) and estuarine systems.

While some of these ecosystem types still remain, others have declined markedly. In some cases, especially cliffs, scarps and tors, dunes and coastal alluvium, the original areas are still largely present but are seriously threatened by invasive plants and their control needs to be considered as a priority under this goal.

### **c) Goal Four – Establishment and protection of four core areas of indigenous forest (1000ha)**

Large core forest areas, including their associated rocky outcrops, wetlands etc, are important to enable the full range of biodiversity to flourish on the Peninsula. These areas need to be large enough to allow viable populations of key fauna (especially birds) and flora to survive and be resilient against external perturbations such as extreme dry summers or severe winters. The core areas should comprise contiguous blocks of forest and will include a mix of old growth remnants, regenerating forest and, when necessary, restoration plantings. Ideally, they will include altitudinal and topographic diversity to buffer against climate change and to allow mobile species such as birds to exploit seasonally available food resources, and they should be relatively compact in shape. The 1000 ha target is an aspirational goal but is likely to be indicative of the size required for viable populations of more mobile bird species and to provide sufficient habitat for rarer plants (e.g. mountain cedar) and to allow the eventual reintroduction of missing species within large territories. Protection should comprise several elements including (1) appropriate protection such as covenanting, (2) exclusion of domestic livestock, (3) control, and where possible exclusion, of introduced herbivores (deer, goats, possums etc) and carnivores (mustelids, rodents etc) to levels that allow indigenous species to flourish, and (4) control of weeds to levels that do not threaten biodiversity values.

#### ***Habitat Protection Progress***

The Trust's habitat protection programme is contributing towards achieving these three goals. This programme has a long history of working with landowners to protect and enhance biodiversity through a range of voluntary protection mechanisms. The most powerful of these is a perpetual conservation covenant that requires current and future landowners to manage the covenant for conservation purposes.

A well-managed covenant results in high value biodiversity being not only protected but enhanced. Indigenous habitat quality quickly improves on the exclusion of stock, weed and animal pests are reduced with good management, and soil and water quality are improved. A conservation covenant is a priceless gift by current landowners to future generations. We currently have 65 covenants in place protecting over 1300ha with a further 13 in progress.

In the last three years the Trust has gratefully received significant funding support from the Immediate Steps Fund and Canterbury Biodiversity Strategy Fund for our covenanting projects. Without this support, our ability to assist landowners to protect biodiversity in perpetuity on private land would be significantly reduced. Landowner demand for the Trust's support is high, and our rate of progress towards achieving these habitat protection and enhancement goals is only limited by the funds available to carry out this work.

## **2. Pest Free Banks Peninsula (Goal Eight)**

Goal 8 of the Ecological Vision is that Banks Peninsula/Te Pātaka o Rākaihautū is effectively free of pest animals. The 'Predator Free New Zealand 2050' project announced by the Government in 2016 has the ambitious goal of trying to remove possums, rodents and mustelids progressively from large areas of mainland New Zealand. Banks Peninsula/Te Pātaka o Rākaihautū is the largest true Peninsula in New Zealand (ca. 100,000 ha) and could be one of the first large areas of New Zealand to become effectively free of these pest predators. Other introduced mammals are also key biodiversity predators (both as herbivores and carnivores) and in the case of Banks Peninsula/Te Pātaka o Rākaihautū include feral deer (red and fallow), goats, pigs, rabbits, hares, feral cats and hedgehogs.

'Effectively free of pest animals' means that all the pest animals listed above have been reduced to numbers that do not threaten biodiversity values. This is a pragmatic definition and accepts that while it may be possible to eliminate some pest animal species from the Peninsula (e.g. goats or deer), it may not be possible to eliminate them all (e.g. rodents). The intent is to reduce all pest animals to zero or as close to zero as possible across the Peninsula.

The removal of pest animals from Banks Peninsula will ensure indigenous species become more abundant and widespread across the Peninsula and into Christchurch City. This includes the common species that characterise the Peninsula today (birds, invertebrates, lizards), as well as currently rare or endemic species (e.g., penguins, falcon, titi, jewelled gecko, ruru, long-tail bats, lamprey, fragrant tree daisy, Akaroa daisy). Success will be demonstrated by robust

scientific evidence that shows species are increasing in abundance and diversity, as well as anecdotal evidence, such as bird song, reported by the community.

To start work towards achieving Goal 8 of the Ecological Vision, the Banks Peninsula Conservation Trust invited representatives from a range of organisations to form the Pest Free Banks Peninsula Working Group.

### ***Pest Free Banks Peninsula and Port Hills Partnership***

The Pest Free Banks Peninsula Working Group has been established as a collaborative partnership between Banks Peninsula Conservation Trust, Christchurch City Council, Department of Conservation, Environment Canterbury, Koukourārata Rūnanga, Rod Donald Banks Peninsula Trust, and the Summit Road Society. The group is currently in the process of formalising their relationship through a MoU and will become known as the Pest Free Banks Peninsula and Port Hills Partnership. Membership to this Partnership will also include Selwyn District Council and be open to a wide range of community groups, schools, and businesses.

Significant work on pest control is already being undertaken by members of this collaboration and long-standing community predator control efforts are undertaken by groups and landowners across Banks Peninsula. The Banks Peninsula community has a track record for community-driven leadership which brings together landowner and multi-agency collaborations to achieve conservation outcomes, e.g., the Goat Eradication Group and Wildside Project.

The BPCT supports the view of the PFBP Working Group that this partnership model that emphasises a community-driven approach with agency support is the most effective way to achieve the Pest Free vision and is critical for the long-term involvement and engagement of landowners.

### **The specific provisions of the Long Term Plan 2018 – 2028 that our submission relates to:**

#### **1. Biodiversity and Biosecurity**

##### **a) Landowner support for delivery of habitat protection and enhancement**

The BPCT welcomes ECAN's recognition in the Long-Term Plan of the need to provide greater support for landowners undertaking habitat protection and enhancement work.

We support Council's intention to have the Immediate Steps funding allocated with an emphasis on connectivity. We encourage a strategic approach to the allocation of funding that supports large-scale habitat restoration projects (that contribute to achieving goal four above).

The Trust encourages Council to significantly increase the funds available to target biodiversity protection on Banks Peninsula for habitats that may not have strong linkages with freshwater values (e.g., the protection of significant old forest remnants and rare ecosystem types).

##### **b) Capability building for not-for-profits**

The demand from Banks Peninsula landowners for assistance from the Trust for biodiversity protection and enhancement exceeds our capacity. As a result, we maintain a waiting list of expressions of interest from landowners seeking BPCT's assistance.

We welcome ECAN's intention to invest in capability building for community organisations to increase conservation outcomes and specifically seek an ongoing annual investment of \$50k to grow the capacity of BPCT's habitat protection programmes.

##### **c) Feral Goat Eradication**

We seek an increased commitment of \$40k funding allocation in year one of the Long Term Plan for the continued support of the Goat Eradication Project on Banks Peninsula.

Feral goats pose one of the most significant threats to biodiversity on the Peninsula. Over the past decade more than 5000 feral goats have been removed as part of the Goat Eradication Project, in which BPCT is a partner, with

in excess of \$300,000 being invested by project partners to date. However, five goat 'hot spots' still remain. The Goat Eradication Group are confident that eradication can be achieved over the next five years with further investment from the partners. Unless, this is done, the community risks losing the benefits of the work done to date as well as having to continue to have to spend money on goat control. The Rod Donald Banks Peninsula Trust has joined the group as an investment partner, but their support is contingent on additional funding being made available from agencies to ensure the ultimate success of the project. To this end, the Goat Eradication Group/PFBPP, with BPCT's support, will also be seeking a comparative level of funding support from CCC and DoC. If successful, this additional funding will allow the Goat Eradication Group to make the step change in effort ECAN is seeking to restore biodiversity on Banks Peninsula.

We congratulate ECAN on their recognition of feral goats as a pest on Banks Peninsula in the recently released Regional Pest Management Plan and encourage you to match this policy decision with an increased funding allocation of \$40k in year one of the Long-Term Plan.

#### **d) Pest Free Banks Peninsula and Port Hills Partnership**

We believe that achieving the Pest Free vision requires the active support and involvement from the communities and landowners who will be required to contribute to, and who will benefit from, the realisation of the vision. A partnership model that emphasises a community-led approach with strong agency support is the most appropriate and effective way to achieve the sort of step change the Council wants. To achieve this, we seek ECAN's long-term commitment to supporting an innovative community-driven partnership approach to all pest control work on Banks Peninsula realised through the Pest Free Banks Peninsula and Port Hills Partnership.

Success will require that all members of the Partnership are committed to implementing an over-arching strategy for Pest Free and a collaborative work programme. We welcome ECAN's support for the development of this work with a \$50k funding allocation to PFBPP in year one.

#### **e) Role of Pest Liaison Committees**

It will be critical that agencies and organisations examine their existing pest related functions and decision-making bodies to ensure strategic alignment with the PFBPP over-arching strategy. We seek that ECAN considers this when reviewing the functions and structure of the Pest Liaison Committee with respect to Banks Peninsula.

## **2. Revenue and Financing Policy**

Realising the Pest Free Banks Peninsula Vision and a step change in biodiversity protection will require a collaborative strategy and work programme that is underpinned by a sustainable revenue stream. We seek that ECAN commits to a significant funding allocation from year two onwards in the Long-Term Plan, comprised of a general rate allocation (50%) and a targeted rate (50%).

Pest control is of national biodiversity importance and achieving Pest Free Banks Peninsula provides a public good for the whole region. In principle, we believe biodiversity protection should be funded entirely from general rates. However, we recognise that general rate funding may be constrained and a pragmatic solution to extend the available funding to support the Pest Free Vision is a combination of general rates and a targeted rate. We consider it appropriate that a contribution from the general rate take makes up 50% of the funding allocated to the PFBPP work programme.

The Banks Peninsula community has a history of undertaking pest control work to protect and enhance biodiversity. The Banks Peninsula Community Initiative Programme (CIP) for possums is an excellent example of community-led/agency supported pest control work. We consider that expanding the existing level of rating for the CIP to cover additional pest species and including all households from the entire Banks Peninsula Ecological Region (which includes the Port Hills) would be well received by a community that is motivated to do more for biodiversity protection.

However, we believe that the support of landowners and the community for additional rating is contingent on the adoption of the innovative community-driven partnership approach to all pest control work on Banks Peninsula which is being promoted by the Pest Free Banks Peninsula Working Group. BPCT fully supports that initiative.

### **3. Regional Leadership**

We seek that ECAN commits to the collaborative community-led/agency supported model described above for pest control, and in doing so: provides PFBPP financial and administrative support to develop the over-arching strategy and collaborative work programme; and ensures that all internal ECAN policy and strategies regarding pest control on Banks Peninsula are aligned to this collaborative approach.

The BPCT would be pleased to receive an invitation to join the Citizens Panel.

**Banks Peninsula Conservation Trust**  
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**March 2018**