

Environment Canterbury

Consultation on the Annual Plan and the Revenue and Financing Policy

Feedback Form

March 2019

Submission by: Banks Peninsula Conservation Trust

Contact details: Maree Burnett

Banks Peninsula Conservation Trust

PO Box 146

Tai Tapu 7645

maree.burnett@bpct.org.nz

021 206 8647

We wish to be heard in support of this submission.

Summary of Submission

The Banks Peninsula Conservation Trust (BPCT) congratulates Environment Canterbury on making indigenous biodiversity protection a strategic priority for Council and supports the intended step change in effort to achieve this, demonstrated through Council's commitment to the Pest Free Banks Peninsula (including Port Hills) / Te Pātaka o Rākaihautū Initiative. The Trust supports the proposed changes to the Revenue and Financing Policy to create a rating area (including the Port Hills) to support the vision for a pest-free Banks Peninsula; and in addition requests that Environment Canterbury makes a long term commitment to supporting a community-driven partnership approach to all pest control work on Banks Peninsula by programming in this change plus an additional \$400,000 from year 3 onwards of the Long Term Plan (LTP).

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. More information on the Trust and the Banks Peninsula/Te Pātaka o Rākaihautū (including the Port Hills) Ecological Vision 2050 is set out in the appendix to this submission.

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.

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.

In November 2018, the ***Pest Free Banks Peninsula/Te Pātaka o Rākaihautū and Port Hills Partnership*** was formalised through a Memorandum of Understanding signed by 14 foundation signatories including Environment Canterbury. This partnership model emphasising 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.

Support for the change in Revenue and Financing Policy for Pest Free Banks Peninsula

Environment Canterbury's support for Pest Free Banks Peninsula is a tangible demonstration of the step change in effort for biodiversity. It is consistent with the values and principles to which the Council has committed itself including regional leadership and working collaboratively with the community and partner agencies, including Ngāi Tahu.

The primary outcome of the Pest Free Banks Peninsula Initiative is enhanced and protected biodiversity. Banks Peninsula is a biodiversity hotspot with both endemic and threatened species. Like most other biodiversity programmes, there will also be economic, social and cultural benefits. With the Peninsula being part of greater Christchurch, it provides opportunities for the urban population to be involved in protecting this unique biodiversity. The Council's support for this initiative is also consistent with your pest management functions under the Biosecurity Act 1993.

Importantly, Environment Canterbury funding will provide a foundation upon which other financial contributions can be leveraged. It is anticipated that with the proposed contribution from Council, we will be able to build up an annual work programme exceeding \$1.5M in the 2019/2020 year. The Council's contribution is critical to securing the additional funding from other partners.

Additional funding from 2020/2021 onwards

We ask that the Environment Canterbury programme in a further increase of \$400,000 from 2020/2021 onwards to bring the total financial support to \$1M per annum. This will enable the Partnership to seek further funding from other partners and provide a solid foundation for achieving the long term goal of Pest Free Banks Peninsula 2050.

To maximise the external funding that can be leveraged from the Council's contribution, it is important to programme in the additional future funding now, rather than waiting until next year or the next LTP. Over coming months, the Partnership will be making multiyear funding applications to external funders. A clear indication from the Council of further financial support will enable us to leverage all your future funding in our applications. If decisions regarding additional funding levels are delayed, the opportunity to leverage additional funding from other sources will be diminished.

Specific comment on the Revenue and Financing Policy

Pest control is of national biodiversity importance and achieving Pest Free Banks Peninsula provides a public good for the whole region. In principle, the Trust believes biodiversity protection should be funded entirely from general rates. However, we recognise that this proposal is building on the existing Community Initiated Programme (CIP) for possums that was introduced at the request of landowners on the Peninsula for both biodiversity and production benefits which were more pertinent at that time. While the proposed programme is primarily for biodiversity, it is acknowledged that, like most biodiversity projects, there will be local benefits for those living on the Peninsula. These include enjoyment of rejuvenating bush and increased bird life, less erosion leading to better water quality, improved mahinga kai, and some economic benefits for farming and tourism.

We also want to ensure that the programme continues to be community-led and believe that having a targeted rate component provides a stronger basis for this. We also recognise that funding this initiative entirely from general rates may lead other parts of the region to ask for similar support without the same local commitment that has been demonstrated through this initiative and the CIP programme.

For these reasons, we accept the proposed 50:50 split between general and targeted rates as a pragmatic solution that allows local community aspirations to be met while also acknowledging the wider benefits of biodiversity.

We also note and support the continuation of rabbit control rate as a separate programme. At this point we believe the Council is best placed to deliver this separately from the rest of the Pest Free programme.

Pest animals, not plants

The Pest Free Banks Peninsula Initiative is focused only on animal pests, not plants. We recognise that control of plant pests is important in achieving the ultimate goals for biodiversity and this is addressed in other goals within our Ecological Vision for Banks Peninsula. We note that there are people who would like it included in the Pest Free Banks Peninsula programme however, the Trust supports the view that adding plant pests to the Pest Free Banks Peninsula programme at this time would be a mistake. Achieving the vision is already an ambitious and challenging goal that will stretch capacity, demand innovation and require widespread community support. The addition of plant pests would dilute the focus and significantly increase the risk of non-achievement.

Banks Peninsula Conservation Trust
PO Box 146, Tai Tapu 7645
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Appendix

The Banks Peninsula Conservation 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.