

# Submission Form

## Draft Conservation Management Strategy



### Once you have completed this form

Send by post to: CMS Submissions, Department of Conservation, Private Bag 4715, Christchurch Mail Centre, Christchurch 8140 or email to: [southislandcms@doc.govt.nz](mailto:southislandcms@doc.govt.nz)

### Submissions must be received no later than 4.30pm, Friday 13 September 2013

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form. A Word version of this form is available on the Department's website: [www.doc.govt.nz/cms](http://www.doc.govt.nz/cms)

**Submission on:** Canterbury / Otago / Southland Murihiku CMS (*please use a separate submission form for each CMS and circle the CMS you are commenting on*)

### Submitter details:

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<input checked="" type="checkbox"/> I wish to be heard in support of my submission (this means you can speak at a hearing)	
<input type="checkbox"/> I do not wish to be heard in support of my submission (tick one box)	
Signature:	

Your submission is submitted as part of a public process and once received by the Department it is subject to the provisions of the Privacy Act 1993 and the Official Information Act 1981. The Department may post your submission on its website and also make it available to departmental staff, any consultant used, the relevant Conservation Board and the New Zealand Conservation Authority. Your submission may be made available to any member of the public following a request made under the Official Information Act 1981.



**Rod Donald Banks Peninsula Trust  
Submission on Canterbury Conservation Management Strategy 2014-2014  
September 2013**

## **Introduction**

The Rod Donald Banks Peninsula Trust was established by the Christchurch City Council in 2010, for the benefit of the present and future inhabitants of Banks Peninsula and its visitors. The objectives of the Trust give it a broad mandate to promote sustainable management, conservation, recreation, culture and heritage, research and public education in the area formerly administered by the Banks Peninsula District Council and to do so in partnership with other groups and agencies. The Trust administers a \$3.5 million fund derived from the sale of farms belonging to the former Council.

The Trust has a bold **vision** to facilitate the restoration of Banks Peninsula to its traditional status as Te Patakā o Rākaihautū – the storehouse that nourishes. In this vision Banks Peninsula has a rich biodiversity, planted streams, lakes and seas flowing with clean water. The local people are prospering and passionately participate in conservation. The Peninsula is known as an ecological island and a place for appreciative recreation, with low impact activities fostered to encourage learning about and respect for the environment.

In 2011 the newly formed Trust undertook a stocktake to understand the groups and agencies working on Banks Peninsula with which it had overlapping objectives. The purpose was to understand the mix of projects taking place, and the strengths, gaps and issues, so that the Trust could support the existing efforts and add maximum value. A key finding was that there was a need for leadership in recreation, particularly to create more walking and cycling, as the current provision was fragmented between the Department of Conservation, the City Council, various private trusts and smaller community initiatives.

The Trust subsequently focussed its objectives into four strategic pillars **Access, Knowledge, Biodiversity and Partnerships**. It is using these four pillars to underpin its projects which aim to facilitate engagement with the environment through improved walking and cycling **access**, to augment that engagement with **knowledge** about the environment, culture and heritage of the place, together leading to a deeper appreciation of the **biodiversity** and the human relationship with it. The projects are to be done in **partnership** with others – authorities, organisations, tangata whenua and local communities, with the Trust taking an umbrella role to support their efforts and link groups together to achieve maximum benefit.

The Trust has since developed its draft Walking and Cycling Strategy which seeks to give effect to the Christchurch City Council Public Open Space Strategy, and commenced its partnership with the Department of Conservation negotiating two significant agreements; first to create a new scenic reserve at Saddle Hill on Banks Peninsula protecting and giving access to an upland area of significant biodiversity and recreational opportunities; more recently to develop the “Spine of the Lizard”, a highly accessible introductory tramping and mountain biking route using an existing network of tracks linking public conservation land between Gebbies Pass and Hilltop. It has also formed partnerships with the Banks Peninsula Conservation Trust and Orton Bradley Park is supporting the publication of Hugh Wilson’s forthcoming book, “Plantlife on Banks Peninsula”, and developing its relationship with Lincoln University.

## Submission summary

The Trust supports the Department of Conservation's 100 year aspirational vision for "*New Zealand to be the greatest living space on Earth*" (CMS Vol 1, P11), and its recognition that to achieve this it will need to connect with others and expand its traditional view of its role.

The Trust sees Banks Peninsula as providing a key exemplar location for the Department to achieve its vision. Banks Peninsula is highly accessible to the large population of Christchurch; it offers a beautiful, diverse landscape and coastline; its resident population is committed to ecological restoration; tourism makes a significant contribution to its economy. The public conservation estate plays a highly significant role, but it is relatively small and fragmented necessitating the forging of partnerships to link it into a more cohesive whole and maximise its value.

The Canterbury Conservation Management Strategy has identified in its 50 year vision that:

*"The Port Hills and Banks Peninsula are destinations for an integrated historical, cultural and eco-tourism experience, and are popular for recreation."* (CMS Vol 1, P12)

The Trust offers its support to the Department in working toward this aspiration. It supports the ten year objectives given in the CMS of restoring natural heritage, bringing history to life, increasing participation in recreation, public engagement with conservation and business partnerships. These objectives closely match its own strategic pillars of access, knowledge, biodiversity and partnership.

The Trust's submission seeks to incorporate these ten year Canterbury objectives into the provisions for Banks Peninsula more explicitly so that the area can make effective progress over the coming decade towards the goal of becoming an integrated destination. It envisages Banks Peninsula playing a vital role in long term recovery of Christchurch helping it to retain and attract a vibrant population. The submission is based around the following six key points.

1. **Use Te Pataka o Rākaihautū rather than Horomaka for the Banks Peninsula Place name** to acknowledge Rākaihautū as the first Waitaha ancestor, symbolising the beginning of human interaction with the natural environment and the abundance of food and forests found in that environment until relatively recently.
2. **Give greater recognition given to Banks Peninsula/Te Pataka o Rākaihautū as a tourism and visitor destination** within close proximity to New Zealand's second largest urban area and offering a wide range of experiences that integrate the human and ecological dimension.
3. **Give greater acknowledgment to the remnant bush reserves on Banks Peninsula/Te Pataka o Rākaihautū** and the important role that they play as part of the integrated visitor experience and as a source for the natural regeneration of biodiversity on the Peninsula.
4. **Set targets to add a new icon and a new Gateway Destination on Banks Peninsula/Te Pataka o Rākaihautū** to act as focal points for the integration of recreation with historical, cultural and eco-tourism experiences. Designating Akaroa Harbour as an Icon destination would reflect its importance to tourism, variety of marine protection measures, land to sea reserve protection, Hector's Dolphin species and significance role in New Zealand's formative history. Designating the Spine of the Lizard route as a Gateway destination would reflect its importance to Christchurch as an easily accessed introductory tramping and mountain biking route with extensive interpretation.
5. **Make it easier for the public to participate at all levels** including in the decision making processes and on the ground with good access on walking tracks and through volunteering.
6. **Keep public conservation land on Banks Peninsula/Te Pataka o Rākaihautū free of aircraft** to retain the maximum area for biodiversity regeneration and quiet appreciative recreation.

The remainder of this submission gives further explanation of these key points, and then a list of specific wording changes to thread them through the various texts, policies, outcomes and supporting maps and appendices in the CMS. This list is not necessarily exhaustive or definitive, but is given to provide more detail on the key points and to assist in the process of incorporating them into the document. Consequential amendments should be made as necessary.<sup>1</sup>

## **Further explanation of the key points**

The key points are now explained further to show how their implementation will help the Department to make significant progress towards its long term vision through developing Banks Peninsula/Te Pataka o Rākaihautū as an exemplar integrated recreation and tourism destination.

### ***Use of Te Pataka o Rākaihautū***

The Trust has chosen to use Te Pataka o Rākaihautū rather than Horomaka as the Maori name for Banks Peninsula/Te Pataka o Rākaihautū. The Waitaha ancestor Rākaihautū is seen by the Trust as the key Pou Whenua, a unifying figure, and the first human connection with this land form. The description of the land as Te Pataka, the foodbasket, represents the connection between eco-systems and their biodiversity and the human dependence on them for sustenance and life support. This name is being used increasingly by the Papatipu Rūnanga and therefore by government agencies (including Environment Canterbury and Christchurch City Council) as the name for Banks Peninsula. Using Te Pataka o Rākaihautū as the partner placename in the CMS would give consistency across the region.

### ***Greater recognition of Banks Peninsula/Te Pataka o Rākaihautū as a Tourism and Recreation destination***

The submission seeks that DOC give a greater recognition to Banks Peninsula/Te Pataka o Rākaihautū's role as a major international tourism destination and a key recreational area.

Banks Peninsula/Te Pataka o Rākaihautū backs directly onto the New Zealand's second largest city and many of its premier locations can be accessed from Christchurch by public transport, on foot or by bicycle, or with a relatively short car journey. This makes it highly accessible to Christchurch residents as a weekend and short holiday destination and ideal for introducing children to the outdoors without the expense and time needed for longer drives. International tourists frequently visit the Peninsula at the start or end of their South Island or New Zealand journey due to its proximity to the airport and the draw-card of its scenery and marine wildlife.

The stunning volcanic landscape of Banks Peninsula/Te Pataka o Rākaihautū offers magnificent views of the Pacific ocean, the plains, the lakes and the alps from many relatively accessible places. There is a network of roads across the Peninsula giving access to a rich and varied range of recreational experiences including its sub-alpine summits and ridges with outstanding views, intimate beaches, bush areas, marine opportunities and many historic and cultural sites.

The scale of the Peninsula with its high points ranging from 500-900m is less daunting than alpine environments making it an appealing walking, tramping and mountain biking outdoor recreation destination for a wide range of ability levels. A Peninsula summit can be climbed there and back in a day excursion and its long high ridges mean that altitude gained is not lost as a walk progresses. The Peninsula also provides a relatively safe environment for outdoor recreation as there are no river crossings and while settings can feel very remote, there are communities or farms nearby. For more hardened trampers it also provides a useful alternative destination when weather or river levels preclude alpine outings.

Akaroa, its harbour and its more populated eastern bays are already a major tourism destination for New Zealand, with the scenery, historic township and Hector's dolphin providing the major attractions. There are many private facilities for accommodating and servicing visitors.

The comparative density and the strong environmental commitment of the resident population mean that Banks Peninsula/Te Pataka o Rākaihautū offers fertile ground for effective community engagement and partnerships. Four strong runanga have their rohe on Banks Peninsula/Te Pataka o Rākaihautū. The Banks Peninsula/Te Pataka o Rākaihautū Conservation Trust takes a leading role in biodiversity initiatives. Banks Peninsula/Te Pataka o Rākaihautū communities are looking for ways to integrate respectful, meaningful recreational experiences with accommodation and services to lead economic growth. This offers opportunities for partnerships and concessions with the Department and the Rod Donald Banks Peninsula/Te Pataka o Rākaihautū Trust aims to take a leading role in facilitating the link between local communities and appreciative recreation.

The Trust sees the success of integrated recreation on Banks Peninsula/Te Pataka o Rākaihautū as a vital component in the Christchurch earthquake recovery. As the rebuild peaks and then tapers off, it will be critical to the success of the region to create new business opportunities and to attract and retain young people in the area. The value of having well-integrated outdoor recreation and a lively tourism industry is likely to come to the fore well within the timeframe of the CMS.

Important changes suggested to achieve greater recognition of Banks Peninsula/Te Pataka o Rākaihautū are: adding it to Part One as a Distinctive Feature of Canterbury; wording changes in the Banks Peninsula/Te Pataka o Rākaihautū Place text to better recognise its proximity to Christchurch; its value as a tourism and visitor destination to sustained recovery; and the relationship between its communities, marine environment and tourism activities.

### ***Greater acknowledgment of the bush reserves***

Public conservation land on Banks Peninsula/Te Pataka o Rākaihautū consists of a patchwork of reserves, many of them protecting remnant old growth bush. While these are small relative to DOC holdings elsewhere in Canterbury they play a very significant role on Banks Peninsula/Te Pataka o Rākaihautū as part of the integrated visitor experience and as a source for the natural regeneration of biodiversity. While most of these reserves are listed in Appendix 4 as priority ecosystem management sites they are only referenced briefly and en masse in the Banks Peninsula/Te Pataka o Rākaihautū Place text. Policy to improve them, the public access to them or the contribution they make toward Banks Peninsula/Te Pataka o Rākaihautū as a destination is lacking. This lack creates an imbalance in the Banks Peninsula/Te Pataka o Rākaihautū Place text which is dominated by references to its off-shore islands. Though culturally and ecologically important, these are either inaccessible or expensive to access for the majority of the public.

The bush reserves on Banks Peninsula/Te Pataka o Rākaihautū provide free public access to some of the most significant remnant forest and often stand in stark contrast to the pastoral land surrounding them, where evidence of the pioneer deforestation remains visible in stumps and logs. These reserves provide ideal sites to integrate historical, cultural and eco-tourism experiences with recreation, explaining the story of the rich biodiversity that once covered the Peninsula, its removal with the advent of European settlement and pastoralisation, the early conservationists whose foresight protected the remnants, the importance of these remnants to native regeneration outside of their boundaries, and the increasing awareness in the Peninsula community of such regeneration.

The reserves also provide habitat for some of the Peninsula's unique flora and its rarer fauna such as the jewelled gecko and protect a variety of eco-systems. While most of the eco-systems contained within the reserves have been defined as priorities on Banks Peninsula/Te Pataka o Rākaihautū, the Warm coastal forest eco-system found in reserves such as Palm Gully, Dan Rogers and the recently acquired Steep Head on the Le Bons Bay headland have not, despite the rarity of such remnants and the protection they afford of a variety of flora and fauna species at their southern limit.

Earlier this year the Trust worked in partnership with the Josef Langer Trust and the Nature Heritage Fund to purchase a 145ha property known as Puaitahi/Saddle Hill on the ridgeline between Akaroa harbour and Reynolds Valley. The property protects a variety of sub-alpine shrubland vegetation and offers a range of recreational opportunities. The agreement between the parties covering the purchase determined that the area is to become a Scenic Reserve reserve managed by the Department of Conservation and that a walking track is to be established to the Saddle Hill summit with the intention of it eventually extending to Hilltop. This new reserve and associated goals need to be included in the CMS.

The Trust submission recommends that: the bush reserves are given an equal level of recognition in the Banks Peninsula/Te Pataka o Rākaihautū Place text as its Islands; its warm coastal forests are acknowledged as priorities, recently acquired public conservation land is included; and objectives, policies and outcomes are included to ensure that these reserves are well managed, increasingly accessible and form part of the vision of Banks Peninsula/Te Pataka o Rākaihautū as an integrated destination.

### ***Aim to create a new Icon and a new Gateway Destination on Banks Peninsula/Te Pataka o Rākaihautū***

The Department has developed a Destination Management Framework to support its overarching strategic vision and increase participation in recreation and to co-ordinate the management of the elements within a geographic area that is the focus of a single trip by a visitor. The framework establishes four different types of Destinations – Icons that underpin national and international tourism, Gateways that encourage people to recreate in the outdoors and start learning about conservation, Local Treasures that support local and regional needs and Backcountry that provide challenging adventures. The overall number of areas with Destination status is limited to enable business planning with a focus on greater participation. The CMS identifies that there is currently one Icon and one Gateway Destination on the Port Hills, (Godley Head and Port Hills Walks), and two

Gateway Destinations on Banks Peninsula/Te Pataka o Rākaihautū, (Quail Island/Ōtamahua and Little River Rail Trail). The local Treasures and Backcountry Destinations have yet to be identified.

The Trust supports the existing designations but submits that more than maintaining the status quo is needed if Banks Peninsula/Te Pataka o Rākaihautū is to develop further as an integrated historical, cultural and eco-tourism destination and the mechanisms provided by the Destination Management Framework should be harnessed to achieve this. Working toward achieving Icon and Gateway Destination status to two new areas emerging as priorities on Banks Peninsula/Te Pataka o Rākaihautū will provide the Department with practical milestones for the coming decade to facilitate its objectives.

The Trust submits that the CMS include targets to designate Akaroa Harbour an Icon Destination and the Spine of the Lizard route as a Gateway Destination.

#### *Akaroa Harbour as an Icon Destination*

Akaroa Harbour is the highest profile destination on Banks Peninsula/Te Pataka o Rākaihautū, a magnet for national and international tourists, and now Canterbury's main cruise ship port, hosting over 80 large ships per annum. It has a thriving marine based eco-tourism industry centred on nature tours to the outer harbour area to see Hector's Dolphins. Most of the harbour is managed as a Taiapure giving a strong role to local rūnanga. The whole harbour and the outer coast is encompassed within the Marine Mammal sanctuary established to protect the dolphins. DOC administers the marine mammal permit system to control commercial operators. Three land reserves (Palm Gully, Dan Rogers and Akaroa Head) about the area recently approved by the Minister for Conservation as a Marine reserve, providing a land to sea sequence of protection. Akaroa Harbour has a nationally significant heritage and is increasingly referred to as the "Waitangi of the South". This appellation reflects its importance in events leading to British sovereignty, the signing of the Treaty at Onuku, and the first demonstration of that sovereignty at Akaroa just prior to the arrival of the French.

Giving the area Icon destination status would accurately reflect its position as a key tourism destination in Canterbury and help the Department to integrate its management of the Banks Peninsula/Te Pataka o Rākaihautū place with its Coastal and Marine place. It would provide a focal point on which to build further interpretation about the significance and biodiversity of the marine areas, the history of their degradation from the time of sealers and whalers, their importance to Maori and to Pakeha as mahinga kai, a food source, and the different management mechanisms in place in different parts of the harbour. The whole marine story could be framed within the wider significant historical context.

#### *Spine of the Lizard as a Gateway Destination*

The CMS includes policy to achieve the integrated provision of walking and mountain biking tracks on Banks Peninsula/Te Pataka o Rākaihautū, both on and off public conservation land and to achieve this through working with Council, the Trust, landowners and the Walking Access Commission.

Since the CMS was drafted, the Trust and the Department have signed a memorandum of understanding in support of their joint aim to develop the "Spine of the Lizard" as an introductory tramping, walking and mountain biking route. The Spine of the Lizard is the name used to describe an emerging vision to improve the existing network of tracks extending from Gebbies Pass to Hilltop via the high ridgeline linking the Lyttelton and Akaroa craters, with connections from the valleys and settlements below. The network is an ancient one, parts of it are thought to be Maori routes, and it was used by whalers and pioneers for access before drainage of lower lying land enabled roads to be built. The spine ridge forms part of visionary Christchurch MP Harry Ell's recreational route from Christchurch to Akaroa and his Sign of the Packhorse hut, currently the Peninsula's only overnight tramping hut and a historic icon, is en route.

The route provides mainly easy walking and tramping along the ridgeline with magnificent and ever changing views. It presents immense scope for interpretation as it passes historic sites, extensive tracts of logged forest, pastureland, and connects together a number of the Peninsula's largest remnant bush reserves on public conservation land. The Packhorse hut is a popular destination for Christchurch people and families wishing to introduce their children to tramping.

The aim of the Memorandum is to improve the maintenance, standard and facilities of the route to create a practical graduated range of opportunities for families, schools and youth groups, mountain bikers and visitors by offering day, one night, two night or longer trips. The Memorandum recognises

that much of the route is on Council or private land and commits to initiate the process of consultation and partnership building with landowners, Papatipu runanga and the local communities.

The Trust's submission seeks that the Spine of the Lizard route is now incorporated into the CMS place text, policies and outcomes.

### ***Make it easier for the public to participate***

The submission seeks to make it easier for the public to participate both in the process of decision making about public conservation land and the role of the Department, and on the ground through walking access and as volunteers.

#### *In the decision making process*

The Canterbury Conservation Management Strategy pulls together an immense amount of information about the public conservation estate, the intentions of the Department and its relationship to the web of external conservation, recreation and tourism agencies and sites. The Trust submits that the CMS should be kept as a living document, available on the Department's website, and updated as new developments (such as additional reserves and the assignment of local treasure and backcountry status) take place and makes various suggestions on how the document could be further augmented to facilitate this process and its utility.

The CMS contains a variety of different classification systems that apply to the various pieces of public conservation land. These include land based eco-system classification, marine based eco-system classification, visitor management zones, recreation destinations, actively conserved historic places and aircraft zones, but no information is given on how these classifications have been determined. In order to facilitate effective public input and understanding of DOC's position, greater clarity is needed in the CMS to explain how these various classifications have been determined, where they have been applied and how they relate to the outcomes that the public can expect for the different pieces of conservation land.

More information is needed about the process that DOC will follow to allocate Local Treasure and Backcountry destination status to particular areas of public conservation land and how the public will be involved in this process.

The Trust's submission contains various comments on how the maps and appendices could be more user-friendly, through the use of more distinctive colours, placing the relevant legends on the maps themselves and providing a single comprehensive reference table listing all the designations applying to each piece of conservation land.

Finally, while the Trust's submission supports engaging with other agencies, private groups, tangata whenua and communities to increase participation and extend the benefits, it also recognises that issues, conflicts and differences of opinion will arise. This is healthy in a democratic society, but the Department will need to anticipate this in its efforts for greater engagement so that it can provide mechanisms to make progress when conflicts occur.

#### *On the ground through walking access*

The primary vector for people to access public conservation land is as independent walkers (and increasingly as cyclists) on free public walking tracks. A key objective of the 10 year vision for Canterbury is for more people to participate in recreation, and through this to engage with conservation, however the CMS makes little acknowledgement of the Department's role in providing or maintaining the existing tracks on public conservation land on Banks Peninsula/Te Pataka o Rākaihautū or those that it currently manages giving access to its land (across unformed legal roads and private land). The tracks are not identified on the maps or listed in the appendices. In contrast specific mention is made of the private Banks Peninsula Track and of concessionaire guiding opportunities. While these both provide excellent experiences for tourists and for some sectors of the domestic society, the cost puts them out of the range of many families, young people and those on low incomes, placing a barrier to increased participation by many ordinary New Zealanders.

The Trust submits that a starting point for increasing appreciative recreational usage of public conservation land on Banks Peninsula/Te Pataka o Rākaihautū is free public walking access on appropriately maintained and well-advertised tracks. Many of the DOC managed walking tracks on Banks Peninsula/Te Pataka o Rākaihautū outside the designated Destination sites are currently in poor condition, and the Palm Gully track remains closed after the earthquakes. No on-site



interpretation is provided at these reserves, and the brochure, *Banks Peninsula Conservation Walks* is brief.

The Trust's submission therefore incorporates recognition of the existing public walking tracks in the CMS and objectives to upgrade and maintain them and to develop appropriate interpretation.

#### *On the ground through volunteering*

The Trust supports the concept of connecting people with conservation through positive experiences including volunteering, but it has also experienced the barriers that volunteers face from health and safety requirements when they seek active participation in conservation. The Trust seeks that as part of its partnership with communities, DOC acknowledge these barriers and finds practical ways to overcome them such as extending the topics covered by its field based training courses, offering them in Canterbury and assisting with the costs for proven volunteers.

#### ***Keep public conservation land on Banks Peninsula/Te Pataka o Rākaihautū free of aircraft.***

While most of the public conservation land on Banks Peninsula/Te Pataka o Rākaihautū has been zoned red and therefore deemed unsuitable for recreational aircraft landing, five important reserves have been zoned yellow meaning applications for recreational aircraft landing are likely to be approved. These reserves are identified as Godley Head, Adderley Head, Mt. Herbert, Waipuna Saddle and Ellangowan,. No reasoning has been given to indicate why these reserves should be zoned as suitable for recreational aircraft landing.

The Trust submits that all public conservation land on Banks Peninsula/Te Pataka o Rākaihautū should be zoned red. The extent of public conservation land of Banks Peninsula/Te Pataka o Rākaihautū is very limited and it should therefore be retained for the regeneration of biodiversity and for low key recreation that is compatible with this regeneration and retains the values of quiet, peacefulness and remoteness that these reserves offer to users. There are already numerous airstrips on the Peninsula on private property, meaning there is no compelling need for the Department to rezone public conservation land for this purpose.

Submission detail

Note: Text in italics is in the tables below is direct quotation from the CMS

<p><b>Section:</b> <i>Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.</i></p>	<p><b>Submission:</b> <i>Explain the nature of your submission stating whether you support or oppose the approach in the CMS. Please provide brief reasons.</i></p>	<p><b>Decision sought:</b> <i>State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:</i>  <ul style="list-style-type: none"> <li>- <i>if supporting: 'retain Policy X'</i></li> <li>- <i>if opposing: 'delete Policy X'</i></li> <li>- <i>if seeking changes 'reword Policy X to read (give suggested wording)</i></li> </ul> </p>
<p>Whole document</p>	<p>The name of the Banks Peninsula place should be changed from Banks Peninsula (Horomaka) place to Banks Peninsula/ Te Pataka o Rākaihautū place to reflect the significance of Rākaihautū as symbolising the relationship between humans and the natural environment.</p>	<p>Change throughout document: Banks Peninsula (Horomaka) place to <b>Banks Peninsula/ Te Pataka o Rākaihautū place</b></p>
<p>Vol 1 Part One P9</p>	<p>The document should be a living document. The appendices and maps should be kept up to date as things change, for instance there are additions to the public conservation estate, the local treasure and backcountry destinations are established.</p>	<p>Add a section  Living Document  The CMS will be made available on the Department's website. The document will be amended as the situation changes and new versions of the document, appendices and maps will be made continually available.</p>
<p>Vol I Part one P12, para 6 Long Term Vision for Canterbury</p>	<p><i>The Port Hills and Banks Peninsula are destinations for an integrated historical, cultural and eco-tourism experience, and are popular for recreation.</i>  The Trust supports this integrated approach and agrees that Banks Peninsula is a very suitable and accessible destination for it to play out.</p>	<p>Retain Vision</p>
<p>Vol 1 Part one P12, para 7 Long Term Vision for Canterbury</p>	<p><i>The history of Canterbury is brought to life in localities such as Ripapa and Otamahua/Quail Islands, Godley Head...</i>  The Trust supports this list but also adds additional sites where the history of bush clearance during European colonisation and the subsequent remnant protection and now regeneration can be explored. The Marine Reserves present locations where marine exploitation and subsequent protection can be brought to life. The original European industry on Banks Peninsula was sealing and whaling. Now eco-tourism, particularly Hector Dolphin viewing, is a major contributor to the economy.</p>	<p>Retain and add  <i>The history of Canterbury is brought to life in localities such as Ripapa and Otamahua/Quail Islands, Godley Head, <b>along the Spine of the Lizard route, in the accessible remnant bush reserves on Banks Peninsula and in its Marine reserves.</b></i></p>
<p>Vol 1 Part one P12, para 8</p>	<p><i>Appreciation of how conservation contributes to the quality of life, and awareness of indigenous biodiversity</i></p>	<p>Retain</p>

<p>Long Term Vision for Canterbury</p>	<p><i>and its importance to culture and economy is at the heart of what it is to live in Canterbury. Youth are supported in their outdoors education and recreation, and are active participants in conservation management.</i></p> <p>The Trust is particularly interested in encouraging youth to participate in outdoor education, recreation and active conservation. Banks Peninsula provides a location close to the majority of youth in Canterbury. One way that the Trust seeks to encourage youth participation is the creation of more huts and a graduated range of opportunities for encouraging young people to use them – children with their families, Scout and Youth groups, schools, camps.</p>	
<p>Vol 1 Part one P13, bullet point 1 Long Term Vision for Canterbury</p>	<p><i>Realising the potential for indigenous biodiversity protection, landscape appreciation, ecosystem services and compatible public use of the high country and foothills</i></p> <p>Banks Peninsula should be included in this list.</p>	<p>Retain and add:</p> <p><i>Realising the potential for indigenous biodiversity protection, landscape appreciation, ecosystem services and compatible public use of the high country and foothills <b>and Banks Peninsula.</b></i></p>
<p>Vol 1 Part one P15 Distinctive features, values and issues of Canterbury</p>	<p>Banks Peninsula is a distinct geological, ecological and recreational feature of Canterbury and as such should be introduced with a separate section in Part One of the strategy.</p>	<p>Change – add the following section before Protection of coastal land and marine environment</p> <p><b>Banks Peninsula</b></p> <p>The crenelated landscape of Banks Peninsula stands in stark contrast to the vast open plains and the alps of Canterbury. Set on the southern side of Christchurch City, and jutting island-like into the Pacific, it is dramatically punctuated by the beautiful volcanic crater harbours of Lyttelton and Akaroa, linked by a land of high continuous ridges providing views to the Southern Alps, over the plains and out to sea and fringed by many intimate coastal bays.</p> <p>Four of Canterbury’s runanga have their rohe on Banks Peninsula and it is also the first place of European settlement in Canterbury. Whalers were followed by sawmillers who reduced its dense forest cover to almost non-existent within 50 years as they sought to create pastoral land. That pastoral land is now dappled with a mosaic of regenerating vegetation, the seed source surviving in a patchwork of remnant bush reserves. The Banks Peninsula community today is highly cognisant of the value of biodiversity from the sub-alpine summits to the</p>

		<p>coastal headlands and valleys and working to protect it on private property.</p> <p>Major settlements include Lyttelton, separated from the adjacent city by the Port Hills, and Akaroa on the eastern side, with its economy increasingly based on marine eco-tourism featuring Hector's Dolphins. Smaller settlement areas include a ribbon of communities around the Lyttelton Harbour and the township of Little River on the main highway to Akaroa. The Peninsula is popular as a holiday destination with tourists and visitors enjoying outdoor recreation such as walking, camping, visiting beaches, boating and fishing and historic sites and a large number of holiday homes.</p> <p>Issues on Banks Peninsula centre on the tensions between land use for commercial farming and its attractiveness as a scenic and recreation destination. This comes about in part because the area is a recreational destination but without a park status, and therefore recreation management is fragmented and inconsistent.</p> <p>Depletion of fish stocks, shellfish and endangered species such as Hector's Dolphins and Penguins are another important issue, reflected in the variety of marine protection measures that have evolved over the years and the conflict produced as they have been introduced.</p>
Vol 1 Part one P15, bullet points	Add a bullet point recognising that conflict over what are the appropriate methods also frustrates progress. The Department can be caught in the middle and need to make difficult decisions about how to progress. The document neither recognises this nor provides any methods for resolving such conflicts.	<p>Change – add a seventh bullet point</p> <ul style="list-style-type: none"> <li>• <b><i>Conflict over the appropriate method to use for protection</i></b></li> </ul>
Vol 1 Part one P16, Para 2 The people and their cultures	<p><i>Pioneers like Julius Von Haast interpreted the Canterbury geology and moa species, Leonard Cockayne championed botanical protection, and Harry Wigley pioneered ski-plane tourism.</i></p> <p>Add Harry Ell as a significant influence. He championed both protection of remnant bush and made the connection between protection and recreational access. This is more relevant to conservation than ski plane tourism.</p>	<p>Change – add the following</p> <p><i>Pioneers like Julius Von Haast interpreted the Canterbury geology and moa species, Leonard Cockayne championed botanical protection, and Harry Ell fostered the link between protection of botanical remnants and recreational access.</i></p>
Vol 1 Part One History is protected	<i>Banks Peninsula (Horomaka) Place, Godley Head...Little River Rail Trail</i>	<i>Banks Peninsula (Horomaka) Place, Godley Head...Little River Rail Trail,</i>

P25	Add the Spine of the Lizard route	<b>Spine of the Lizard route</b>
Vol 1 Part one P 27, 1.5.3 para 2	The document provides a definition of the Icon, Gateways, Local Treasures and Backcountry categories in the glossary. Appendix 11 provides a list of the Icon and Gateway sites, but there is no information on how the Department will choose the Local Treasure and Backcountry destinations, the public processes that will be involved with this or the service levels that such destinations will attract. Specific text is not proposed as the process is not known.  The Trust asks to be involved in this process.	Change – add <b>Process for selecting Local Treasure and Backcountry destinations</b>  the information on the process the Department will follow to select the Local Treasure and Backcountry destinations, the timeframe for this and how the public will be involved.  Explain how Destination Management relates to the Visitor Management Zones as prescribed in Appendix 12.
Vol 1 Objectives P28	Add an objective to determine the Local Treasure and Backcountry destinations	Add 1.5.3.15 – The Local Treasure and Backcountry destinations will be selected with involvement from the public for each of the Places in Canterbury and the appropriate level of facilities and service determined.
Vol 1 Milestones	Add a milestone to have the Local Treasure and Backcountry selected within the next 3 years	Add  Completed by the end of Year 3  Selection of the Local Treasure and Backcountry locations for all Canterbury Places and service schedules in place to ensure facilities and tracks are at an appropriate standard and well maintained.
Vol 1 Part one P28 1,5,3,14	Include Banks Peninsula the list of holiday accommodation.	Change – add the following  <b>MacKenzie, Hurunui and Banks Peninsula holiday accommodation areas</b>
Vol 1 Part one P25, bullet point 2	Add in the Spine of the Lizard route (which includes the Sign of the Packhorse) as a place where history is brought to life. This route is known to have been used by Maori, whalers and early settlers and there is graphic evidence en route of the impact of logging with totara tree stumps and logs littering the route, fences made from these materials, and surviving remnant totara both in bush reserves and in open pasture.	Change – add the following  <b>Banks Peninsula (Horomaka) Place: Godley Head, Ripapa, Otamahua/Quail Island, Spine of the Lizard route, Sign of the Packhorse Hut, Little River Rail Trail.</b>
Vol 1 Part One Objectives	Include an objective to recognise the desire to volunteer and to assist volunteers to meet health and safety standards	Add and objective  1.5.4.6 Support volunteers to meet health and safety requirements by supplying and funding appropriate training and certification

<p>Vol 1 Part one P31, 1.5.5 bullet point 2</p>	<p>2.3 <i>Banks Peninsula (Horomaka) Place—guided and other walking linking public conservation and other lands, with concessionaire or commercial accommodation.</i></p> <p>The key for these opportunities is that the walking tracks themselves are provided and maintained.</p>	<p>Change to</p> <p><i>Banks Peninsula (Horomaka) Place—well developed and maintained walking tracks link and traverse public conservation land, facilitating concessionaire opportunities including guiding and commercial accommodation.</i></p>
<p>Vol1 Banks Peninsula (Horomaka) place P46, Para 7</p>	<p>Reword this paragraph. In gives insufficient recognition to the close geographic proximity to Christchurch, the range of access and its significance as a tourism destination. <i>As well as being home to its residents, the Peninsula is often regarded as an accessible recreation area at the ‘backdoor’ of Christchurch City. Visitor use of the Peninsula, however, needs to be viewed in the context of other recreational opportunities within Canterbury reached in similar travel times from Christchurch. The Port Hills, Lyttelton and Akaroa Harbour basins, Little River and some Eastern Bays provide intensively used areas, but elsewhere quite remote settings can still be experienced.</i></p>	<p>Change to the following:</p> <p><i>Situated on the doorstep of Christchurch City, the volcanic landscape of Banks Peninsula is home to many diverse rural communities and provides equally diverse recreational opportunities to city residents and visitors. The Port Hills and Lyttelton Harbour are accessible on foot or bike from the city via numerous trails from hillside suburbs and the Little River Rail Trail provides a cycleway to the heart of the Peninsula. Akaroa is a popular holiday and tourism destination with the Hector's Dolphin as a primary draw card with other marine, coastal, historic and walking experiences also popular. More remote settings can also be experienced in the upland reserves and smaller outer bays and valleys.</i></p>
<p>Vol1 Banks Peninsula (Horomaka) place P46, Para 8</p>	<p>Add in the Akaroa Harbour as an Icon destination and the Spine of the Lizard as a Gateway. <i>In addition to the Godley Head Icon destination, the Port Hills Walks, Quail Island and the Little River Rail Trail are Gateway destinations.</i></p>	<p>Change and add</p> <p><i>In addition to the Godley Head and Akaroa Harbour Icon destinations, the Port Hills Walks, Quail Island, and the Little River Rail Trail are Gateway destinations. The Spine of the Lizard route is under development as a further Gateway destination providing city residents, visitors and young people with a range of introductory tramping and mountain biking experiences.</i></p>
<p>Vol 1 Banks Peninsula (Horomaka) place P47 Bullet point 8</p>	<p><i>Reduced involvement in public access issues off public conservation land, but still working with councils and New Zealand Walking Access Commission to develop access linkages between public conservation lands</i></p> <p><i>The Department currently manages and maintains a network of tracks on Banks Peninsula both on public conservation land and tracks linking to it and this should continue. These include the Otepatotu, Montgomery Reserve, Kaituna Valley, Okuti Valley, Hay reserve, Palm Gully, Little River Rail Trail on conservation land and the Summit Walkway, Mt. Herbert Walkway, Kaituna Valley to the Packhorse hut, Pigeon Bay</i></p>	<p>Replace B</p> <p>Bullet point 8</p> <p><i>. Improving the existing network of walking and cycling tracks that is currently managed by the Department, both on public conservation land and tracks linking to it, and working with councils ,New Zealand Walking Access Commission and the Rod Donald Banks Peninsula Trust to extend the network.</i></p>

	<p><i>Walkway, Walkway to Nikau Palm Gully – finish lis later</i></p> <p>The Emerging Priorities list does not include any new aspirational projects for the next 10 year period for Banks Peninsula. This section should list the new opportunities and priorities that are described in the Outcomes regarding providing a network of linked recreational walking and cycling tracks. This has already commenced with the purchase of Saddle Hill and the Spine of the Lizard MOU.</p> <p>While the Walking Access Commission deals with access issues, the bullet point should make it clear that the Department will continue to maintain and manage the various walking tracks that it currently takes responsibility for on Banks Peninsula that are not on its own land.</p>	
Vol 1 Banks Peninsula (Horomaka) place P47, Emerging Priorities	The Emerging Priorities list does not include any new aspirational projects for the marine areas. Akaroa and its Harbour have become more high profile since the earthquakes and the shift of cruise ships to the harbour.	<p>Add after the bulleted list</p> <p><i>New opportunities and priorities that are emerging including the focus on Akaroa Harbour with the re-deployment of cruise ships to the harbour and approval of the Akaroa Marine Reserve,</i></p> <p>More text is given in the table entries below</p>
Vol 1 Banks Peninsula (Horomaka) place P47, Emerging Priorities	The CMS anticipates that the Akaroa Marine Reserve will be gazetted by the end of the year. It should create the further aspirations around this Reserve that Akaroa Harbour becomes an Icon destination	<p>Add a bullet point</p> <ul style="list-style-type: none"> <li><i>Incorporate the Akaroa Marine Reserve into an Icon Destination at Akaroa Harbour based upon the new Reserve, the Marine Mammal Sanctuary, the endangered Hector Dolphin species, the adjacent Taiapure, the Palm Gully, Dan Rogers and Akaroa Head reserves to create a major tourism attraction that integrates historical, cultural and eco-tourism experiences</i></li> </ul>
	The Department of Conservation and the Trust have now signed a Memorandum of Understanding to develop the tracks on the ridgeline between Gebbies Pass and Hilltop and various tracks that feed to it from the valleys below into a major recreational route to be known as the Spine of the Lizard. Please refer to the attached MOU for further information. Funding has been committed to create the Initial Concept Plan and to work in partnership with the Christchurch City	<p>Add a bullet point</p> <ul style="list-style-type: none"> <li><i>The Spine of the Lizard is a new project designed to develop a major tramping, walking and cycling route linking Gebbies Pass to Hilltop via the Sign of the Packhorse hut and public conservation land including the Sign of the Packhorse, Mt. Herbert, Waipuna Saddle, Whatarangi, Mt. Fitzgerald, Mt. Sinclair and Montgomery Park reserves. The aim is to create</i></li> </ul>

	<p>Council, papatipu runanaga, private landowners, local communities and business. The route will match the criteria for a Gateway Destination and be highly accessible to Christchurch.</p>	<p><i>cohesive and well used recreational and educational resource easily accessible from Christchurch. The project aims to provide a graduated set of opportunities for people to explore the outdoor environment and will cater for walkers, trampers and mountain bikers. The project aims to build links between the Christchurch City Council, Rod Donald Banks Peninsula Trust, private landowners, papatipu runanga and local communities to develop a major Gateway destination linking public conservation land using unformed legal roads and private land crossings that are all currently in use as informal tracks. Project development includes developing appropriate shelter, facilities. The Department will continue to manage and maintain these tracks as the project is developed and after it has completed.</i></p>
	<p>The Crown and the Trust have signed a Memorandum of Understanding over the intended use of the newly purchased Saddle Hill property. It is to become a Scenic Reserve with a walking track, a hut and rock climbing area. There is also the aspiration to connect the Saddle Hill walking track with Hilltop thereby extending the Spine of the Lizard route.</p>	<p><i>Add a bullet point</i></p> <ul style="list-style-type: none"> <li><i>Saddle Hill is a newly acquired reserve extending over the ridgeline between Reynolds Valley in the Little River catchment and Wainui in the Akaroa Harbour. The reserve, which features expansive views in all directions, Coffin Rock and the summit will be developed for outdoor recreation including a walking track to the summit and a hut. The Department will work in conjunction with the Rod Donald Banks Peninsula Trust, Christchurch City Council and adjacent landowners to develop a walking track linking the reserve with the Spine of the Lizard at Hilltop.</i></li> </ul>
<p>Vol 1 Banks Peninsula (Horomaka) place P48, para 1</p>	<p><i>Aircraft landings are precluded from most public conservation lands on the Peninsula, due to the factors of easy road access, vegetation cover, ground-based public use, and vulnerable wildlife, but a low level of activity would not be incompatible with some areas.</i></p> <p>Reword this statement. The public conservation land on Banks Peninsula is very limited and should be retained for recreation compatible with biodiversity regeneration and quiet, non-motorised recreation. There is ample private land and existing airstrips available for aircraft</p>	<p>Change to</p> <p><i>Aircraft landings are precluded from <b>all</b> public conservation lands on the Peninsula, due to the factors of easy road access, vegetation cover and regeneration, ground-based public use, vulnerable wildlife, <b>the limited pool of conservation land and the availability of airstrips on private land.</b></i></p>



	<p>landings. Aircraft landing in the Mt. Herbert and Waipuna Saddle reserves would interfere with the values and experience of the new Spine of the Lizard route, and aircraft landing in Ellangowan would also affect these values in the nearby Hinewai reserve and residential areas. Although the policies limited the number of landings per operator, they do not set an overall limit on the number of operators, and once zoned for aircraft there could be pressure for the number of operators to increase.</p>	
<p>Vol 1 Banks Peninsula (Horomaka) place Statutory Management and protection P49</p>	<p>The first paragraph describing the reserves on Banks Peninsula is very brief and no additional detail is provided elsewhere in the Place text to describe the importance of the scenic reserves protecting remnant bush and the value that these have for biodiversity protection and regeneration and the public ability to understand them.</p>	<p>Add the following text after the first paragraph</p> <p><i>The bush reserves on Banks Peninsula provide public access to some of the most significant remnant forest and often stand in contrast to the pastoral land surrounding them, where evidence of the pioneer logging industry remains visible in stumps and logs. These reserves provide ideal sites to integrate historical, cultural and eco-tourism experiences with recreation, explaining the story of the biodiversity that covered the Peninsula, its removal with the advent of European settlement, the early conservationists whose foresight protected the remnants, their importance to native regeneration outside of their boundaries, and the increasing awareness in the farming community of such regeneration.</i></p> <p><i>Most of the reserves on public conservation land protect upper cool-temperate zone old growth forest remnants, for example at Mount Herbert, Otepatotu and Carews Peak,. Some of these upper zone reserves also protect sub-alpine shrublands including snow tussock and dracopyllum - again Mt. Herbert is an example as are Mt. Sinclair and Saddle Hill.</i></p> <p><i>There are only two reserves protecting remnants of old growth lower cool temperate forest, these being the Hay reserve in Pigeon Bay and the Kaituna Reserve in Kaituna valley. Although these are tiny remnants they are publicly accessible unlike the most extensive remnant of this type which is on private land in Prices Valley.</i></p> <p><i>The warm coastal forest reserves include a number of warm temperate</i></p>

		<p><i>species at the southern limits, both plants and animals, with the most iconic being the Nikau Palm. These reserves are Palm gully and Dan Rogers on the southern side of Akaroa Harbour, and the new Steep Head Gully in Le Bons Bay.</i></p> <p><i>Other reserves, such as Petit Carenage and Otamahua/Quail Island protect predominantly regenerating forest featuring naturally seeded kanuka as well as extensive plantings.</i></p>
<p>Vol 1 Banks Peninsula (Horomaka) place Statutory Management and protection P50</p>	<p>The text does not describe the existing walking tracks managed by the Department both on and off public conservation land.</p>	<p>Add the following text as a new paragraph after the first paragraph ending with “<i>and unformed roads</i>”</p> <p><i>The Department manages and maintains a number of walking tracks on Banks Peninsula, and these provide a primary vector for the public to engage with the Department and with the variety of biodiversity that it protects on public conservation land on Banks Peninsula. Walking tracks that are entirely on public conservation land with access from public roads are at Godley Head, on the Port Hills (Lyttelton and Tauhinukorokio), Kaituna Valley, Hay Reserve in Pigeon Bay, Okuti Reserve, Montgomery Peak, Otepatotu, Ellangowan and Akaroa Head reserves. The Department also manages a number of walking tracks that cross private land or make use of unformed legal roads to access public conservation land and these tracks leading to the Sign of the Packhorse reserve, Mt. Herbert, Waipuna Saddle, Mt. Fitzgerald, Mt. Sinclair, Whatarangi Totara and Palm Gully reserves.</i></p>
<p>Vol 1 Banks Peninsula (Horomaka) place P50, para 1</p>	<p>Since the CMS was drafted, the Trust has signed the Spine of the Lizard MOU with DOC to jointly develop an existing network of routes from Gebbies Pass to Hilltop and the Saddle Hill Deed to develop a route from Hilltop to Bossu Road. Update the CMS to reflect these agreements.</p> <p><i>A Christchurch City Council controlled organisation, the Rod Donald Banks Peninsula Trust, has a mandate to further develop recreational walking, cycling and affordable camping, building on the network of existing Peninsula tracks and giving effect to Council’s Public Open Space Strategy 2010–2040.</i></p>	<p>Retain and Add</p> <p><i>A Christchurch City Council controlled organisation, the Rod Donald Banks Peninsula Trust, has a mandate to further develop recreational walking, cycling and affordable camping, building on the network of existing Peninsula tracks and giving effect to Council’s Public Open Space Strategy 2010–2040. The Department has entered into agreements with the Trust to develop the Spine of the Lizard as a major introductory tramping and mountain biking route from a network of existing tracks and routes between Gebbies Pass to Hilltop and a further route linking the Hilltop to Bossu road via the Saddle Hill reserve, recently purchased by Nature</i></p>

		<i>Heritage Fund.</i>
Vol 1 Banks Peninsula (Horomaka) place P52 Outcomes	Add Outcomes to reflect this submission	<p>Add the following outcomes</p> <p><i>An Icon Destination has been developed at Akaroa Harbour featuring its marine environment and variety of management methods, its, land to sea connections, and its nationally significant heritage. There is excellent interpretation and coordination with concessionaires.</i></p> <p><i>A Gateway Destination has been developed as the Spine of the Lizard track with appropriately maintained walking, tramping and cycling routes, good signage, facilities, interpretation and an additional overnight hut.</i></p> <p><i>The existing walking tracks on public conservation land are well maintained, have appropriate signage and interpretation and are well used.</i></p> <p><i>The existing walking tracks that are not on public land but are managed by the Department are well maintained The Nikau Palm Gully reserve track has re-opened.</i></p>
Vol 1 Banks Peninsula (Horomaka) place P55, Policy 2.5.8	Support <i>Achieve, with Christchurch City Council, New Zealand Walking Access Commission, Rod Donald Banks Peninsula Trust and landowners, the integrated provision of walking and mountain-bike tracks, both on and off public conservation land, including opportunities for additional summit-ridge hut backcountry accommodation.</i>	Retain and add <i>Achieve, with Christchurch City Council, New Zealand Walking Access Commission, Rod Donald Banks Peninsula Trust and landowners, the integrated provision of walking and mountain-bike tracks, both on and off public conservation land, including opportunities for additional summit-ridge hut backcountry accommodation. <b>The Spine of the Lizard route will be the first project and when complete will aim to achieve Gateway destination status.</b></i>
Vol 1 Coastal land and Marine Place P64-65	The Marine Reserve has been approved by the Minister for Conservation. In order to provide cohesive management of the new reserve, the CMS should be drafted in anticipation of that gazettal, while making it clear that at the time of drafting this is pending. As described previously, the Akaroa Harbour should be given Icon Destination status with the new Reserve as the focal point. More text should be added to the section describing the reserve to support this classification, including its proximity to the major	Reword and add to the text  <i>Akaroa Marine Reserve The Minister of Conservation in April 2013 approved a marine reserve to adjoin the Dan Rogers area at the eastern entrance to Akaroa Harbour. Subject to the concurrence of the Ministers of Transport and Primary Industries, the reserve is to be gazetted latter in 2013; the reserve's name and the establishment or otherwise of an advisory committee to be determined nearer that time. Scientific monitoring of</i>

	<p>Canterbury destination of Akaroa set within the outstanding scenic environment of Akaroa harbour, Add an explanation about the significance of this reserve and its relationship with the township of Akaroa and its eco-tourism industry based on viewing and swimming with Hector's dolphins and nature cruises in the harbour. Explain how the new Marine reserve is surrounded by a Taiapure and within the Marine Mammal sanctuary providing opportunities for comparative study and the possibility of mutual benefit and understanding of different marine protection measures. The Rod Donald Banks Peninsula Trust has committed to part fund a study on the relationship between tourism and marine protection measures in Akaroa harbour, designed to be repeated over time.</p>	<p><i>the reserve is to be undertaken, and the reserve outcomes reviewed after 10 years. The reserve is shown on the CMS maps and marked as pending gazettal. The proposed reserve will predominantly be accessible by and from boats; its shores being cliffs and wave-cut rock platforms. Extensive boat based visitor use already occurs in the area as if forms the focal point for Akaroa's nature tourism industry, a vital part of the area's economy. This is likely to increase with the marine reserve status.</i></p> <p><i>The 475ha reserve is situated at the south-eastern end of the Akaroa harbour and includes the spectacular scenery of the Dan Rogers cliffs and Cathedral Cave within the harbour and Haylocks Bay on the outer coast. Three land reserves border the marine reserve including the Dan Rogers Creek Reserve, Palm Gully Reserve and Akaroa Head Reserve providing an ecological sequence of protection for biodiversity and good public access for viewing the Marine reserve. There is road access to the Akaroa Head reserve and walking access to the Palm Gully reserve. Hector's dolphins are frequently seen within the Reserve area and are the main drawcard for the nature tourism industry which includes scenic boat tours, swimming with the dolphins and kayaking trips. Unlike the existing Pohatu Marine Reserve where access is difficult, the Akaroa Marine Reserve is highly accessible for both visitors and residents in the area. The reserve is also visible and adjacent to the area used by all of the larger cruise ships which have been visiting the harbour since the Canterbury Earthquakes. The reserve area is within the Banks Peninsula Marine Mammal Sanctuary and is surrounded by Akaroa Harbour Taiapure. The interaction between the Marine reserve and these other protection measures is likely to provide cross boundary benefits and the opportunity for comparative study.</i></p> <p><i>The siting of the Marine reserve within a premier holiday and tourism destination, its accessibility, the proximity of significant land reserves and the inter-relationship with other forms of marine protection combine to make the Akaroa Harbour an Icon destination.</i></p>
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Vol 1 Coastal land and Marine Place P68	Outcomes should be added for the Akaroa Marine Reserve	Add an outcomes section for the Akaroa Marine Reserve once it has been gazetted
Vol 1 Coastal land and Marine Place P71	Add policies for the management of the Akaroa Marine Reserve consistent with a status of Icon Destination	Add policies for the Akaroa Marine Reserve once it has been gazetted.
Vol 1 Appendix 1 RMA exemptions P174	The reserves on Banks Peninsula should be explicitly listed as well as included in the catch all “all other public conservation land on Banks Peninsula”. Otherwise – why have this list?	Change and add: <provide a list of the reserves on Banks Peninsula>
Vol 1 Appendix 3 Islands	Horomaka Issues. Does not mention the existence of the Sea Scout Hut, but has “significance to Ngai Tahu listed twice”. Presumably this an error?	Change and add Issues: Remove second reference to Ngai Tahu and replace with <i>Management and role of existing Scout Hut</i>
Vol 1 Appendix 4 Priority Eco-system management sites	<p>There is no mention of how the priority eco-systems have been selected or what the difference is between reserves that have been rate as High Priority or Secondary Priority.</p> <p>This appendix does not mention the Palm Gully or Dan Rogers reserves which represent the Warm Coastal Forest eco-system.</p> <p>The Banks Peninsula upper zone listings do not mention sub-alpine scrublands</p> <p>Hay SR appears in the upper zone cool forest remnant list as well as in Banks Peninsula Pigeon</p> <p>The Okuti Valley Reserve is listed as a priority eco-system on the Banks Peninsula map but does not appear in this appendix</p> <p>The new public conservation land blocks of Saddle Hill and Steep Head Gully should be added to Cool forest central and Coastal Forest respectively</p>	<p>Change and add</p> <p><i>Add text to explain how the priority classifications have been determined and the difference between High and Secondary priority.</i></p> <p><i>Add another table entry for Banks Peninsula Coastal Forest with warm – temperate remnants (Nikau Palm Gully, Dan Rogers, Steep Head gully) and their attendant species, administrative status and sizes</i></p> <p><i>Add sub-alpine shrublands to the ecosystem habitats in the categories of Banks Peninsula central cool forest remnants, cool forest eastern and Herbert, and list the plant species of snow tussock and dracophyllum.</i></p> <p><i>Add Okuti Valley Reserve to the appropriate Ecosystem category entry</i></p> <p><i>Add Saddle Hill to central cool forest remnants</i></p>
Vol 1 Appendix 7 Iconic species	A list of iconic species chosen by all New Zealanders may be biased toward the North Island population. This list does not include any iconic Canterbury Species.	Change and Add We suggest that a consultation process is held to determine which species Canterbury residents consider iconic.
Vol 1 Appendix 8 Marine habitats and ecosystems	<p>This appendix does not explain why the ecosystems are broken into these categories. It is not apparent to the lay person that Banks Peninsula is split over several zones with a dividing point at North Head.</p> <p>In the absence of any justification for the</p>	<p>Change and add</p> <p>An explanation of how the ecosystem boundaries have been derived.</p> <p>Create a single zone for the coastline of Banks Peninsula</p>

	marine zone boundaries, it would seem more logical that the rocky coastline of Banks Peninsula was a single eco system	
Vol 1 Appendix 10 P250	The Sign of the Packhorse is a key feature of the Spine of the Lizard route.	Change <i>Sign of the Packhorse Hut Destination Management category/access to Part of a Gateway destination, accessible by foot or mountain bike</i>
Vol 1 Appendix 10 P250	With the approval of the Akaroa Marine Reserve, the Nikau Palm Gully should become part of an Akaroa Harbour Icon Destination )	Change <i>Nikau Palm Dendroglyphs Destination Management category/access to Part of an Icon destination</i>
Vol 1 Appendix 11	<i>Icon sites are developed to support the growth of domestic and international tourism.</i> Akaroa is a major Canterbury tourism destination and also provides the port gateway for all cruise ships visiting Canterbury. . The Akaroa Marine Reserve, the adjacent land reserves and the associated walking access should be classified as an Icon Destination. This area meets the definition given in Objective 3.1 of the Department of Conservation Statement of Intent 2013-2017, p27 which states that	Retain existing icons and Add <i>Icon Destinations</i> <i>Akaroa Harbour</i> <i>Place Banks Peninsula</i>
Vol 1 Appendix 11	DOC and the Rod Donald Banks Peninsula Trust have signed an MOU to develop the Spine of the Lizard network of tracks into a cohesive and well used recreational and educational resource easily accessible from Christchurch. The project aims to provide a graduated set of introductory opportunities for people to explore the outdoor environment and to provide extensive interpretation along the route to enable users to gain a better understanding of how to behave with respect and keep safe in the rural environment and the biodiversity, history, culture and farming practices of Banks Peninsula. The tracks link and route through six Department of Conservation reserves and includes the historic Sign of the Packhorse hut. The route also provides a physical gateway from the City to the remoter parts of Banks Peninsula with access by car, by cycle along the Summit Road or by bus and ferry to Diamond harbour with a return public transport route available along Highway 75 back to Christchurch City. The Spine of the Lizard route meets the criteria for a Gateway destination as defined in the Department of Conservation Statement of Intent 2013-	Retain existing Gateways and Add <i>Gateway Destination</i> <i>Spine of the Lizard route</i> <i>Place Banks Peninsula</i>

	2017 Objective 3.2, P27 which states that <i>Gateway destinations are developed to introduce new participants and to grow recreation in the outdoors.</i>	
Vol 1 Appendix 11	The CMS makes frequent references to Local Treasure and Backcountry destinations, but does not provide a list of what these are. A greater degree of transparency is needed for the public to engage in a meaningful way with the Department over these areas. A place for a table should be provided in Appendix 11 listing all the Local Treasure and Backcountry locations in Canterbury and it should reference the section in the CMS where the process for determining these reserve classifications is described.	Add to the Appendix  Local Treasure Destinations – still to be determined following the process described in Part One.  Backcountry Destinations – still to be determined following the process described in Part One.
Vol 1 Appendix 12	Marine Reserves are classified under the Rural visitor management zones. Accessible Marine Reserves should be classified as Front Country if they are readily accessible by scheduled services and concessionaires	Change and add  <i>Marine Reserves also under the Front Country heading</i>
Vol II Legend	The use of similar colours for different categories and the placement of all the legends on a single page rather than on the maps they apply to makes the maps very difficult to read, particularly for Banks Peninsula where all the public conservation land is on a much smaller scale.. For instance it is hard to tell on the maps whether visitor management zones are Back country or Remote, Front country or Rural, whether ecosystems are High priority or Second priority. The aircraft access zones should be given clear names explaining what they are (such as prohibited, special agreements, discretionary, permitted, otherwise the legend adds no value – the colours can be seen	Change  Use more distinct colours for the different classifications and include the applicable legends on the map pages
Vol II Map 2 Indicative ecosystems and destination priorities	The destination priorities on Banks Peninsula are clustered on the city side. Akaroa harbour is a major destination for marine mammal watching and eco-tourism and should be listed as a destination priority	Change and add  <i>Destination priority indicator for Akaroa</i>
Vol II Map 4 Aircraft Access P10	The public conservation land on Banks Peninsula should be used for recreation compatible with biodiversity regeneration and non-motorised recreation. There is ample private land and existing airstrips available for aircraft landings.	Change  <i>Colour all public conservation land on Banks Peninsula as Red on this map</i>
Vol II Map 5.3 Banks Peninsula (Horomaka) Place P19	The purpose of this map is unclear. Is it just showing the priority sites for DOC? What about the Historic sites – should they be on it?	Change  <i>Add the Akaroa Marine Reserve as a red icon destination</i>

	<p>The map does not include a number of Banks Peninsula reserves - all the public conservation land should be clearly shown as well as the walking tracks that the Department manages so that the public can see the area that DOC is responsible for on Banks Peninsula..</p> <p>The map shows the Place boundary as well off the coast – this contradicts with other maps and the Place text</p> <p>Add the Akaroa Marine Reserve as a potential Icon destination and the Spine of the Lizard route as a potential Gateway destination for the reasons given above</p> <p>Add the Nikau Palm, Dan Rogers and Lighthouse reserves</p> <p>Add the newly purchased Saddle Hill property as public conservation land</p>	<p><i>Add the Spine of the Lizard route as a Gateway destination. Place the point at the Sign of the Packhorse hut.</i></p> <p><i>Add the Nikau Palm, Dan Rogers and Lighthouse reserves as part of the Icon destination and priority eco systems</i></p> <p><i>Add the Historic sites</i></p> <p><i>Show the Place boundary as around the coast</i></p>
<p>Vol II Map 5.3.1 Banks Peninsula (Horomaka) Place detail P20</p>	<p>The purpose of this map is also unclear. It includes land belonging to the Council and local trusts, but not a complete set of the as shown on map 6.17. The important reserves of Palm Gully, Dan Rogers and Akaroa Head are not shown. There is no explanation of the light blue shading on water areas or what their significance is. Referring to the Legend is confusing – is it Major Water Body? Is it Area of Significant value to Ecan?</p> <p>Marine protected areas such as Taiapure and Mataitai are not shown.</p> <p>Long distance walking tracks managed by the Department are not shown</p>	<p>Change and add</p> <p><i>A clear legend to the map</i></p> <p><i>Explicitly include all public conservation land – Palm Gully, Dan Rogers, Akaroa Head, Saddle Hill, Steep Head Gully, Akaroa Marine Reserve (pending)</i></p> <p><i>Explicitly include all Walking tracks managed by DOC</i></p> <p><i>Show the marine areas that are protected by Mataitai reserves, the Akaroa Taiapure and any other marine protection measures.</i></p>
<p>Vol II Map 5.4.2 Coastal and Marine Place detail</p>	<p>Add the Akaroa Marine Reserve</p> <p>It is unclear what the status and meaning of the areas coloured light blue is</p> <p>It is unclear why Okains Bay and Pa Island are indicated in large font</p> <p>Indicate North Head on Banks Peninsula clearly as it is the divider between different Coastal and Marine ecosystems used in Appendix 8 and draw lines to show where these divisions apply.</p>	<p>Change</p> <p><i>Add a legend to the map</i></p> <p><i>Add the Akaroa Marine Reserve to the map and indicate this is pending gazettal.</i></p> <p><i>Indicate North Head in a larger font and draw lines to show where the different eco-system boundaries if the existing boundaries are retained, or changed boundaries if the submission under Vol ! App 8 is accepted that the coastline around Banks Peninsula should for a single zone.</i></p>

<sup>i</sup> Further information on the Trust and the partnerships and projects it has formed are given on its website, [www.rod دونالدtrust.co.nz](http://www.rod دونالدtrust.co.nz). The views expressed in this submission are from the Trust and do not necessarily reflect those of the Christchurch City Council