



Submission to

Christchurch City Council

Long Term Plan 2018-28

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Submission summary

Banks Peninsula makes up a large percentage of the area administered by Christchurch City Council.

Banks Peninsula offers Christchurch City residents and visitors an outstanding natural landscape in which to enjoy outdoor recreation on the doorstep of its urban area. It provides huge scope for native biodiversity recovery and enhancement. It provides a place for people to appreciate the natural environment and the importance of biodiversity. Potentially it has a significant role to play in the transition to a low carbon economy as a carbon sink for the City.

The Rod Donald Banks Peninsula Trust is a Council Controlled Organisation (CCO) of Christchurch City Council, tasked with promoting sustainable management and conservation on Banks Peninsula.

The Trust has been operating for seven years, enabling progress to be made on public access, outdoor recreation and biodiversity recovery on the Peninsula, while the Council has focused on earthquake recovery in urban Christchurch.

The Trust has a substantial tranche of achievements giving effect to the Council's Public Open Space and Biodiversity Strategies. In the process, the Trust has built excellent relationships with a wide range of agencies and community groups working in this space.

The Trust would now like to strengthen its relationship with the Council through working together on a set of shared projects over the next three years, and extending over the 10 year period of the Long Term Plan 2018-28.

The Trust supports the Community Outcomes identified in the Long Term Plan 2018-28 (p91-96), and suggests they would be strengthened with recognition of:

- outdoor recreation as a key contributor to the Christchurch identity, a liveable city, a high quality of life and the role that Banks Peninsula can play in this; and
- the opportunity for biodiversity gains and enhancement on Banks Peninsula, including for carbon sequestration.

The Trust is in a position to co-fund and provide expertise to further shared projects and in this submission suggests that it collaborate with the Council to achieve:

- improvements to regional parks and tracks to help achieve the Council's new Long Term Plan targets in an efficient manner;
- better protection for regenerating biodiversity through strategic acquisitions, enhanced pest control, support for landowners and carbon offsetting;
- better visitor management, planning and facilities for Banks Peninsula to facilitate its sustainable management;
- policy development with regard to public access, biodiversity and landscape protection on Banks Peninsula.

The Trust signals that it would like to hold discussions at a governance and senior management level with regard to collaborative projects over the coming three years. It also signals a desire to discuss ongoing work over the 10 year life of the LTP with a view to developing shared projects and funding streams for inclusion in the LTP 2021-2031, or any earlier LTP revision.

The table below summarises the key areas of support and changes requested to the draft Long Term Plan 2018-28, with the highest priority items highlighted. The body of the submission follows, addressing each of these points with more detail explaining how they assist in meeting the Community Outcomes and the goals of the Council's Public Open Space Strategy and Biodiversity Strategy.

Table 1 Summary of Submission points

LTP Reference	Summary of Change Requested
Community Outcomes	
Strong Communities - Safe and Healthy	Reword bullet point 6 as <ul style="list-style-type: none"> Increased public awareness and understanding of natural hazards and climate change, and their associated challenges and responsibilities
Strong Communities- Celebration of identity	Reword to Celebration of our identity through arts, culture, heritage, sport and outdoor recreation
Liveable City -21 st century garden city we are proud to live in	Add bullet point <ul style="list-style-type: none"> Rural areas have increasing areas of indigenous biodiversity protected and open for non-motorised recreational public access
Healthy Environment - Unique landscapes and indigenous biodiversity are valued	Add bullet point <ul style="list-style-type: none"> The role of indigenous biodiversity in absorbing and offsetting carbon emissions is recognised We work to build environmental stewards of the future through outdoor recreation and education
Healthy Environment - Sustainable use of resources	Add bullet point <ul style="list-style-type: none"> We understand and manage our visitors as well as our resident population
Service Plan Parks and Foreshore	
p11 Regional Parks per 1000 targets	<ul style="list-style-type: none"> Support new target subject to a baseline data identifying current holding being publicly available. Trust may be able to assist to achieve this target
p12 Recreational tracks per 1000 target	<ul style="list-style-type: none"> Support new target subject to a baseline document identifying current tracks, their lengths, grades and maintenance level being publicly available and a review as to whether this is a realistic target. Current tracks to include those on Unformed Legal Road, and such tracks to be included in Council's asset register and maintenance schedules
P17 Conservation groups supported	<ul style="list-style-type: none"> Support target and funding for financial support for Conservation groups.
Add	<ul style="list-style-type: none"> Assign a maintenance budget for any tracks currently included in the measure but not receiving maintenance
Add	<ul style="list-style-type: none"> Review track maintenance budgets and methods to make more cost effective use of funds through working with local contractors and volunteers
Add	<ul style="list-style-type: none"> Consolidate all Parks and Tracks work on Banks Peninsula under the management of the Regional Parks team and fund this team accordingly
Add	<ul style="list-style-type: none"> Employ a Banks Peninsula Ranger resident in the Akaroa/Wairewa area within the Regional Parks Team
Add	<ul style="list-style-type: none"> Re-open the French Cemetery Track at L'Aube Hill Akaroa.
Add	<ul style="list-style-type: none"> Open Unformed Legal Road between Hinewai Reserve and Otanerito Beach for

LTP Reference	Summary of Change Requested
	walking access
Add	<ul style="list-style-type: none"> Contribute to Goat Eradication pest control work with \$35,000 in 2018/19 and future years as determined by the Pest Free Banks Peninsula and Port Hills Partnership operational plan.
Service Plan Strategic Planning and Policy	
Add	<ul style="list-style-type: none"> Develop a policy on Unformed Legal Roads and their potential for walking and cycling
Add	<ul style="list-style-type: none"> Restrict motorised vehicular access on Unformed Legal Roads on Te Ara Pātaka network as shown in Appendix B of this submission to those used for land management purposes only
Add	<ul style="list-style-type: none"> Investigate and implement providing rates relief to properties with Conservation Covenants protecting native biodiversity
Add	<ul style="list-style-type: none"> Find ways to incorporate carbon sequestration through native forest regeneration into Council plans to transition to a low carbon city
Add	<ul style="list-style-type: none"> Develop a Banks Peninsula Visitor Strategy underpinned with data on demand and carrying capacities
Add	<ul style="list-style-type: none"> Determine a Council team responsible for the Banks Peninsula Tourism Gateway signage and allocate budget for updating the signs
Service Plan Traffic Safety and Efficiency	
Add	<ul style="list-style-type: none"> Allocate funds to develop footpaths at Beach Road and Onuku Road in Akaroa Allocate funds to develop footpaths and safer crossings for recreational walkers alongside or across Marine Drive, Diamond Harbour
Add	<ul style="list-style-type: none"> Allocate funds to investigate managing three roads for non-motorised recreational use and biodiversity corridors through speed restrictions, signage and biodiversity focused vegetation management. <ul style="list-style-type: none"> Long Bay Road at Hinewai Reserve, Summit Road above the head of the Lyttelton Harbour, Western Valley Road
Amend service provision	<ul style="list-style-type: none"> Employ the Freedom Camping Warden in the evenings, including on weekends and public holidays, not only during the daytime
Capital Program Parks Heritage and Coastal	
Add	<ul style="list-style-type: none"> Assign a capital budget for Strategic land acquisition to achieve the Regional Parks land targets
Add	<ul style="list-style-type: none"> Assign a capital budget to support addition of tracks to be added to meet the Recreational Tracks target
43678	<ul style="list-style-type: none"> Support Recreation development in Little River if this budget is for the 'Little River Big Ideas' short walkways
41904	<ul style="list-style-type: none"> Bring forward some of the deferred Regional Park budget to enable progress on the Reserve Management Plans for Te Oka and Misty Peaks Reserves.
42071	<ul style="list-style-type: none"> Prioritise Delivery Package - Regional Parks Signs Renewals - to peri-urban track signage matching walk routes in the Trust's brochures over three years in <ul style="list-style-type: none"> Akaroa, Diamond Harbour and

LTP Reference	Summary of Change Requested
	<ul style="list-style-type: none"> ○ Lyttelton
42067	<ul style="list-style-type: none"> ● Prioritise Delivery Package - Port Hills/ Banks Peninsula Renewal- to <ul style="list-style-type: none"> ○ Mt Herbert Walkway in Morgans Gully and ○ Te Ara Pātaka between Gebbies Pass and Packhorse
408, 17744, 41951	<ul style="list-style-type: none"> ● Support budget for Head to Head walkway and the associated Governors Bay Wharf and sea wall repairs
43702 or 41904	<ul style="list-style-type: none"> ● Install simple non-flushing (ie compost, pit or container) toilet at Tumbledown Bay, potentially using funds from this budget

We wish to be heard in support of our submission.

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1 Introduction

The land area administered by Christchurch City Council increased by a factor of four when rural Banks Peninsula was amalgamated into the City in 2006.

The vast new territory brought with it a host of opportunities that complemented the urban city and complexities that presented new management challenges.

A moratorium freezing service levels for the first 5 years gave the Council breathing space to develop policy to harness and meet these opportunities and understand the complexities.

Key opportunities identified were the Peninsula's potential for recreation (the playground of Christchurch), and for the enhancement of native biodiversity. By mid-2010 the Council had developed a Public Open Space Strategy, a Biodiversity Strategy, and initiated a new CCO, the Rod Donald Banks Peninsula Trust, tasked with promoting sustainable management and conservation of the former Banks Peninsula District Council area, through projects focused on recreation and biodiversity.

Just a few weeks later in September 2010 the earthquake sequence commenced, and the Council entered the long, difficult and expensive period where its attention necessarily turned to its core urban areas and earthquake recovery, rather than expanding its vision for Banks Peninsula.

In the meantime, the Rod Donald Banks Peninsula Trust was established and commenced work, largely independently of the Council, on projects advancing the Public Open Space Strategy and enhancing biodiversity across Banks Peninsula.

Now, seven years on, the Trust has a significant body of achievement behind it: improving public foot access on Banks Peninsula; promoting the area for sustainable use; and securing large tracts of land for biodiversity recovery.

The Trust has developed strong partnerships with the Department of Conservation and the Banks Peninsula Conservation Trust. It enjoys excellent relationships with the Banks Peninsula Community Board, Peninsula landowners, private reserve owners, community groups, tourism information centres, tramping clubs, youth groups and the Parks, Recreation and Tourism department at Lincoln University. It has a network of locally based contractors who understand the Trust and its projects and give it great value for money.

The Trust gives its overall support to the Council's draft Long Term Plan 2018-28 and signals that it now seeks to partner more closely with the Council on shared projects to achieve shared aims.

The submission opens with a summary of Trust's principal achievements to date, and how these enact the Council's Public Open Space Strategy and enhance biodiversity outcomes.

The submission then discusses how the Trust supports the Council's Community Outcomes and suggests some added wording to give greater recognition to the role of outdoor recreation in strengthening the community and building environmental stewards of the future, and to the role that native biodiversity enhancement can play in the transition to a low carbon city.

The body of the submission discusses how the Trust and Council could collaborate on projects to achieve shared aims around:

- Parks and tracks
- Increased provision for biodiversity
- Better visitor management

The discussion identifies where further Council policy is needed and how the Trust can assist the Council to achieve better service levels through greater efficiencies.

It concludes with an invitation to the Council to engage in governance level discussions about these projects over the next three years, and then the longer term projects looking out 10 years.

2 Achievements of the Trust to date

The Trust commenced in July 2010 with a \$3.5million capital fund; a voluntary board of seven Trustees appointed by the Council; and a deed giving it broad objectives and wide powers to achieve them.

Early on, it determined that its projects would be underpinned by four pillars: Access; Biodiversity, Knowledge; and Partnership; To achieve an enduring legacy the Trust realised it would need to expend its capital rather than spending the interest only.

The Trust determined it would take an integrated and holistic view of Banks Peninsula supporting the work of others and filling the gaps, ensuring it worked in partnership on all its projects, seeking an investment by others on a ratio of 5:1 on its capital investments.

The Trust has continued to operate with a voluntary board, successfully attracting new Trustees as long-serving members retire. It has engaged a full time manager on a contract basis, and carries out all its work through its local contractor network.

Over the past seven years the Trust has developed a leadership role in promoting and developing public access on Banks Peninsula, and a supporting role in promoting and securing land for biodiversity, recognising that Banks Peninsula Conservation Trust already holds a leadership role in coordinating biodiversity efforts.

Major achievements of the Rod Donald Banks Peninsula Trust to date include:

- Comprehensive mapping and promotion of all recreational walking and biking tracks on Banks Peninsula, regardless of underlying land ownership (CCC, DOC or private reserves) with the information published in its annually updated hardcopy Banks Peninsula Walks Directory and online website www.bpwalks.co.nz. It has also produced six popular walking brochures detailing walks not promoted in the material of other agencies.
- Developing Te Ara Pātaka, in partnership with Department of Conservation, as an introductory tramping track network, with 71 kms of track linking the Lyttelton and Akaroa Craters along the summit ridgeline and connecting to communities below.
- The Trust has provided Rod Donald Hut as part of this project to provide the second night of accommodation and complement DOC's historic Packhorse Hut. The track is now proving a popular destination for families with young children and youth groups introducing young people to tramping and the outdoor environment.
- With other organisations promoting access and exploration of Banks Peninsula through an annual Banks Peninsula Walking Festival.
- Securing public access in perpetuity on two key linkages across private land
- Supporting the development of the Lyttelton Head to Head walkway
- Facilitating and funding (in part or whole) of six new reserve areas set aside for biodiversity enhancement on Banks Peninsula with a total land area of 460ha, all with public access in perpetuity on well-managed walking tracks.

- Supporting the Banks Peninsula Conservation Trust financially, enabling that organisation to grow and develop its Ecological Vision, which the Rod Donald Trust and others agencies are now supporting
- Facilitating and assisting Orton Bradley Park
- Supporting book publications and several smaller scale community projects

In making these achievements, the Trust has depleted its cash reserve by \$900,000, but still retains equity of \$3.25 million (as of June 2018).

3 Community Outcomes in the Long Term Plan

The Trust supports the Community Outcomes sought by the LTP2018-28. The Trust is also working to build strong communities through participation in volunteer networks, to advance safety and health through well-managed outdoor recreation, to improve the health of the environment and to make Christchurch and Banks Peninsula a great place for people to live. We submit that the Community Outcomes would be strengthened with the following additions:

Table 2 Community Outcomes sought

Topic	Outcome addition requested	Reason
Strong Communities	Safe and Healthy Communities Add to “What this means to our District” bullet point 6 <ul style="list-style-type: none"> • Increased public awareness and understanding of natural hazards and climate change, and their associated challenges and responsibilities” 	As Christchurch makes the transition to a low carbon city, both the Council and individuals will need to work on reduction and mitigation of carbon emissions. Banks Peninsula offers the city immense potential for carbon absorption and offsetting, particularly when combined with biodiversity gains
	Celebration of our identity through arts, culture, heritage and sport Add to state: Celebration of our identity through arts, culture, heritage, sport and outdoor recreation	Outdoor recreation has traditionally been one of Christchurch City’s principal attractions, including its coastal setting and proximity to the Southern Alps. The recreational opportunities provided by Banks Peninsula on the City’s doorstep have huge potential that is being increasingly realised.
Liveable City	21 st century garden city we are proud to live in Add bullet point <ul style="list-style-type: none"> • Rural areas have increasing areas of indigenous biodiversity and are protected and open for non-motorised recreational access 	Research also shows the health benefits of outdoor recreation in natural areas.
Healthy Environment	Unique landscapes and indigenous biodiversity are valued Add bullet point <ul style="list-style-type: none"> • The role of indigenous biodiversity in 	The government seeks to plant a billion trees to offset New Zealand’s carbon emissions. Native forest regenerates rapidly on Banks Peninsula and with minimum cost, effort and environmental downsides. A focus on

Topic	Outcome addition requested	Reason
	absorbing and offsetting carbon emissions is recognised	restoration of native forest on the Peninsula will assist Christchurch to make its contribution with a wide range of other benefits.
	<p>Unique landscapes and indigenous biodiversity are valued</p> <p>Add bullet point</p> <ul style="list-style-type: none"> We work to build the environmental stewards of the future through outdoor recreation and education 	Under 'Strong Communities' the LTP already identifies that climate change, natural hazards and environmental issues are the long term challenges our young people will need to face. Outdoor recreation and education within settings of indigenous biodiversity build young people to face these challenges
	<p>Sustainable use of resources</p> <p>Add bullet point</p> <ul style="list-style-type: none"> We understand and manage our visitors as well as our resident population 	Visitor numbers to New Zealand have grown enormously and the sheer numbers on Banks Peninsula (both domestic and overseas) are having an impact on its environment. Visitor management needs to form part of the sustainability focus.

4 Collaboration on projects around parks and tracks

The Trust supports the new quantity based targets introduced into the LTP to measure and increase the extent of Regional Parks and Recreational Tracks in line with population growth.

At the same time, we stress that growth in quantity is not the only measure of improvement. The degree to which the Council facilitates use of Parks and Tracks through publicity and good maintenance is equally important. At present the Council holds large tracts of Regional Park land on Banks Peninsula that are almost entirely undeveloped, and many of the existing walking tracks on its reserves, both Urban and Regional Park are in very poor state of maintenance, limiting their use.

We believe that substantially better service levels for Parks and Tracks are needed on Banks Peninsula in addition to asset growth targets. The Trust offers to assist the Council to achieve better maintenance in a cost effective manner by encouraging closer relationships with local community groups (such as Reserve Management Committees), the development of a volunteer track maintenance groups, the use of local contractors, and partnerships with other agencies such as the Department of Conservation and private Trusts such as Hinewai, the Summit Road Society, Orton Bradley Park and the Langer Trust.

The Trust has also identified a series of key project areas where it would like to collaborate directly to improve the signage, marking and maintenance of key parts of the existing track network.

The Trust has clear priorities on the next parts of the Public Open Space Strategy that it seeks to implement, principally to achieve the Lyttelton Head to Head walkway and to extend the Te Ara Pātaka network, and has some suggestions on how these could assist the Council in achieving its asset growth targets.

4.1 Analysis of new Parks and Tracks targets

The Trust supports the new targets for increasing the Regional Park holding and kilometres of tracks per 1000 of population but offers some analysis of these targets and what may be needed to achieve them, and some suggestions of how this could be done.

4.1.1 Service Plan Targets for Regional Parks

The Service Plan for Parks and Foreshore p11 identifies a new target of 20ha of Regional Park/1000 people.

Based on the June 2018 projected population of 387,200 people, the Council would need to have 7,744ha of Regional Park at the outset of this LTP to meet its target. Our enquiries with the Regional Parks Team Leader indicate that the current Regional Parks area is 6,775ha, indicating a current shortfall of 969ha at the commencement of the LTP from this baseline.

We cannot find a matching budget in the Capital Projects to acquire 969ha within the coming year, and therefore consider that the Council is setting itself up to fail with this target.

The Trust does have a priority list of properties over which it seeks to secure access to facilitate Te Ara Pātaka and the Lyttelton Head to Head Walkway, and has some funding allocated toward this. The Trust would like to discuss these with the Council during the LTP process to determine whether it could work together with the Council assisting it to reach its Regional Parks targets by the end of the coming three year period.

4.1.2 Service Plan targets for Tracks

The Service Plan for Parks and Foreshore p12 identifies a new target of 2850m of recreational tracks and pathways per 1000 people.

Again, based on the June 2018 projected population of 387,200 people, the Council would need to have 1,103kms of track to meet this target.

The LTP Consultation Document p40 states that the Council has a network of more than 130km of walking and mountain biking tracks. We currently have requests outstanding with staff to ascertain what has been included in this figure and whether it includes all the tracks on Banks Peninsula.

The LTP Consultation Document p40 also states:

“At present we do not propose funding any new tracks over the 10 years of this plan.”

This statement and the new targets are at odds with each other. To achieve the Service Plan Targets it has set itself, it appears that the Council may need to develop up to 1000km of track over the next year to meet its target, yet it has not proposed any funding to do so.

Furthermore, we note that planned spending to improve Banks Peninsula Tracks originally scheduled for the 2018-21 period has been deferred (41904). We request that this funding is reinstated, and will refer again to this under our comments on Te Oka and Misty Peaks Reserves.

4.1.3 Unformed Legal Roads

On Banks Peninsula many existing walkways use Unformed Legal Roads. It is our understanding from discussions with the Regional Parks Team Leader that these do not fall within the Regional Parks team remit (although the team does have some involvement with their maintenance and marking) because they are not classified as Regional Park assets. We suspect that they are not counted as recreational tracks either. Such tracks include:

- Te Ara Pātaka from Gebbies Pass to Packhorse Hut and parts of Mt Herbert Walkway (8km)
- Okuti Track (9km)

- Woodills track Akaroa (5km)

The Trust is concerned that because these tracks do not appear on the asset registers, the maintenance they receive is patchy at best. We recommend that where tracks fall on Unformed Legal Road they are included within the Regional Parks system as assets to be maintained and counted in the total kilometres of track that the Council is providing.

We recommend that where Unformed Legal Roads pass through Regional Park land and are managed as part of the Park, they are included in the calculating the area of the Park.

4.1.4 Meaningful user-focused baselines

These measures, combined with a careful review of the total kilometres of track, may assist the Council to ensure that its targets are realistic and determine the budget levels needed to grow the asset to meet them.

We submit that a published list of all Regional Parks with their size in hectares, and a list of all actively managed recreational tracks and pathways and their lengths in kilometres, should be released to the public so that their inclusion in target achievements at the end of each year is transparent, and the public can fully appreciate the efforts the Council is making to meet the targets initially and then to grow the asset in line with population growth.

We suggest that the budgets used to achieve these new targets, both in terms of capital expenditure and the additional maintenance, are itemised separately in the Long Term Plan with some indication on how the targets are to be achieved.

We suggest that the Council *could* take a more holistic and user-based approach to the provision of both regional parks and tracks on Banks Peninsula as the Trust has done. This would entail a review of the entire park and track resource provided across all land agencies and then population based growth targets set across this bigger baseline. The Council could then consider how it could partner with and support collaborative efforts to land access, acquisition and track management, enabling it to accrue the value of increases where it has assisted against its reporting targets, even if other bodies own and manage the assets.

4.1.5 Management Plans Te Oka and Misty Peaks Reserves

Te Oka and Misty Peaks Reserves on Banks Peninsula together account for 20% of the land classified as Regional Parks, but are currently undeveloped with minimal public access

In 2017 the Council announced it would develop Reserve Management Plans for these two large Regional Parks and that these Reserve Management Plans would be released in November 2017. A call was put out for initial comments, and the Trust responded. To date no draft Reserve Management Plans have been released for public comment.

Of greater concern is that no funding is allocated in the LTP for the development of these two significant Reserves. We request that the Reserve Management Plans are completed during the coming financial year, and in the 2019 Annual Plan or any review of the LTP r, appropriate provision is made to begin their development based on the Reserve Management Plans.

The budget for development of Banks Peninsula Regional Parks in the capital programme (item 41904) has been deferred. Some or all of this should be reinstated in the next three year period to enable progress to be made on developing these Regional Parks. Again, with low key development and involvement of volunteers, improvements could be made in a cost effective manner.

4.1.6 Development of walks in Little River

Little River attracts increasing numbers of visitors, but has little in the way of activities within the township itself. The Trust has seen the plans developed as part of the 'Little River Big Ideas' projects

and supports the development of the short walkways in the town suggested in that plan and the submissions of the Little River/Wairewa Community Trust in this regard. We are unsure if this is included in the capital program budget 43678.

The Trust is also interested in developing further long distance walking from Little River using some Unformed Legal Roads.

4.2 Improving service levels

The Trust seeks improved service levels for the tracks on Banks Peninsula. These tracks, whether they are in parks currently classified as Urban, are Unformed Legal Roads, or in Regional Parks are all essentially regional assets.

The tracks and parks on Banks Peninsula are not used by local residents only. They form a hugely important drawcard for its visitors, including Christchurch City residents, domestic visitors and international visitors, and it is important for the whole area that they are well maintained.

We suggest that with some re-arrangements to how Parks and Tracks are managed with much higher service levels could be achieved efficiently without greatly increased costs.

4.2.1 Current track maintenance

Many tracks on Council land on Banks Peninsula further afield from the Port Hills are badly signposted, often overgrown, and include hazards such as large holes, with infrastructure such as stiles often neglected. They do not appear to be covered by adequate maintenance levels. Work is often contracted out to contractors who lack local knowledge or understanding of the uses. There is continuous confusion and duplication of effort with some tracks managed by the Urban parks team and others by the Regional parks team.

The Trust suggests that the following changes to service delivery approach would make a significant difference to the state of this important asset.

4.2.2 More use of local contractors

The Banks Peninsula Community Board has repeatedly requested that local contractors be engaged to service local facilities. Distances are large on Banks Peninsula and it is palpably inefficient to have separate contractors driving to many remote locations to carry out simple tasks. We are aware that the Parks unit did some investigations into the use of local contractors a few years ago, but submit that this was an inadequate and half-hearted attempt and should be revisited.

The Trust has used local contractors to carry out track work in a cost-effective manner, working with the land and keeping things simple. We submit that the Council needs to put in the effort to build relationships with such contractors based in local communities (rather than trying to let a single Peninsula wide contract) and while this might take some time and effort to set up, in the end it will be much more efficient.

4.2.3 More effective involvement of volunteers

Banks Peninsula residents are keen to assist on a voluntary basis. There is a network of Reserve Management Committees eager to improve the maintenance in their individual reserves. There are active Ratepayers and Community Groups eager to improve maintenance of tracks. These community groups include many people with skills across a wide range of relevant disciplines and good practical ability.

The volunteering level by Reserve Management Committees well exceeds the targets set for volunteering in Community and Regional Parks in the Parks and Foreshore Service Plan.

Far from supporting their voluntary efforts, the Council has stripped these committees of their ability to hold and manage funds and to let contracts for work. The committees are frustrated with this, and it has not resulted in better management. The committees have difficulty in keeping track of where funds allocated to their Reserve are held in Council and getting work done in conjunction with Council is leading to a great deal of dissatisfaction.

Reserve Management Committees are currently classed as sub-committees of the Community Board. If this does not provide a suitable legal framework for them to hold and manage funds, then the Council should find another way in which to empower and facilitate them, such as Administering Bodies under the Reserves Act, or funding them as independent incorporated groups or charitable trusts. The Council could maintain an advisory and oversight role in terms of funds it grants, but re-empowering the committees would lead to much more efficient and effective use of funds.

4.2.4 Consolidation under Regional Parks team

We submit that a consolidation of all Banks Peninsula parks and tracks under management of the Regional Parks Team would lead to service improvements across the board.

The Regional Parks Team has a long history of managing tracks and reserves in rural areas and working with volunteer groups based on their pre-amalgamation experience of the Port Hills reserves.

They demonstrate an excellent approach to working with Peninsula landowners. Their expertise cuts across both recreation and biodiversity. They bring a practical, hands-on and realistic approach to reserve and track development.

The Regional Parks Team has retained a long institutional knowledge achieved through its consistent and long-serving staff. The importance of staff stability cannot be stressed enough when it comes to building the long-term relationships and understanding of the complexities of Banks Peninsula.

Regional Park's staff have recently been stepping up to assist with work on the Lyttelton Head to Head walkway and this has resulted in a marked improvement to the standard and timeliness of work. Recently a volunteer agreement has been co-drafted with the Church Bay community association for track work, putting the Team in a position to roll-out similar agreements with other volunteer groups.

Should the Regional Parks Team take over management of all Council reserves we would expect that funding and staffing would be increased pro-rata.

4.2.5 Banks Peninsula Ranger

We also understand there is provision for a dedicated Banks Peninsula Ranger in the Long Term Plan, but have not been able to locate the funding line for this, and enquiries with the Regional Parks Team Leader indicate that it is not a Regional Parks position. We therefore assume it is an Urban Parks position.

We strongly support the addition of a dedicated Banks Peninsula Ranger to the Council staff, but submit that this position come under the Regional Parks Team for the reasons given above.

We also submit that a Banks Peninsula Ranger should be required to live in the Akaroa/Wairewa Ward. Department of Conservation have this policy for their rangers, and it works extremely well as their staff are integrated members of the community, making them are aware of problems, issues and opportunities early, getting small but important jobs done through natural co-operation with locals, taking pride in their roles in the community, and not wasting time on daily travel. A locally based Banks Peninsula Ranger would provide a much better interface with Reserve Management Committees and other local groups than exists at present.

4.2.6 L'Aube Hill

L'Aube Hill reserve in Akaroa is an example of an 'orphan' reserve. It does not have a Reserve Management Plan or Reserve Management Committee, and there is no community involvement in decision making around this Reserve as a result. The Reserve contains one of Akaroa's premier historic sites, the French Cemetery. The track to this historic site has recently been closed in a ridiculous manner, with huge expensive barriers erected to prevent users from crossing a small slip area. Despite our enquiries, no Council unit has taken responsibility for the closure and we have no information on when or if it will re-open.

We submit that the Council re-opens this track immediately.

4.3 Proposed shared projects for existing track network

The Trust signals that it would like to work with and co-fund two projects to improve the existing track network. Discussions have been held with the Regional Parks Team leader who advises that these projects should be signalled in the Trust's submission to assist with determining priorities for use of the Delivery Package for Regional Parks sign renewals.

4.3.1 Peri-urban Track signage

The Trust has produced brochures describing walking routes in the peri-urban/rural areas of Akaroa, Diamond Harbour and Lyttelton. Many people use these walks.

- In Akaroa there is a long history of use by visitors from out of the area, and this is now increasing at Diamond Harbour and Lyttelton. These walks are generally circular routes, starting at a central point in each rural centre and linking together different reserves, points of interest and views to create attractive and appealing day walks. However, the user experience on all of them is degraded by the lack of signage along the way.
- In Akaroa, the Trust and Council have worked together to develop attractive and useful trail head sign boards, and some signage was done by the Council in 2009. However, this is now out of date, and badly in need of renewal.
- In Diamond Harbour there is confusion between the Lyttelton Head to Head signage, DOC signage and a general lack of signage of the brochure routes.
- The same applies in Lyttelton.

The Trust proposes that the signage in each area is upgraded, tackling one community per year of the LTP, starting with Akaroa. The Trust has allocated a budget to assist and will provide a signage plan and expertise to assist with design and placement of signs.

This submission requests that funding in the Delivery Package for Regional Parks sign renewals is prioritised for this project and that work commences immediately to rectify these long standing issues.

4.3.2 Te Ara Pātaka

The Te Ara Pātaka network of tracks runs over Unformed Legal Road, Council reserves, DOC reserves and private land. In the LTP 2015-2025 the Council agreed to support Te Ara Pātaka network of walking tracks project (then names the Spine of the Lizard), on the understanding that there was no financial implication to this decision. This enabled the Trust to add the Council's endorsement to its prospectus on the project.

In this submission, the Trust is requesting that the Council does now take some action to improve the condition and maintenance of those sections of the track that it currently manages, and to take

some policy actions with regard to the Unformed Legal Road traversed by much of this track network.

The track sections that the Council currently manages are the Mt Herbert Walkway passing through Morgans Gully in Diamond Harbour and the main track linking Gebbies Pass to Packhorse Hut.

The Mt Herbert Walkway links the Diamond Harbour Ferry and Stoddart Point directly to the summit of Mt Herbert, the highest point on Banks Peninsula. This is a superb day hike, or can form part of the longer overnight tramping track. It should be the premier hike on Banks Peninsula promoted for its stunning scenery and accessibility via public transport. Currently the condition of the walkway where it passes through Council owned land (approx. 2kms) is disgraceful. The track is overgrown, and with no formation it is slippery and muddy and contains sink holes. The Trust submits that funding allocated to the Banks Peninsula Track renewal program (42067) should be prioritised to this track, and that the Council work with local contractors and volunteers to lift the standard and maintenance on this track.

- The Gebbies Pass to Packhorse Hut track section needs better marking, and some minor work on stiles. Again, the Trust submits that funding allocated to the Banks Peninsula Track renewal program should be prioritised to this track and offers to assist financially to complete the minor works needed.

4.3.3 Lyttelton Head to Head Walkway

The Trust is a member of the Lyttelton Head to Head Walkway working party and supports the funding allocation for the Lyttelton Head to Head Walkway in the LTP. The Trust is actively working to find routes that will complete the gaps in the existing network.

The Trust also supports the proposed funding for the Governors Bay jetty repairs. We see the jetty as an iconic feature of the Lyttelton Head to Head walkway, and one that will be well used by walkers once it is repaired.

4.4 Improved management of Unformed Legal Roads

Banks Peninsula contains a huge number of Unformed Legal Roads, an asset owned by the Council.

Most of these are fenced within adjoining properties and managed as part of the farm or rural operations. Some Unformed Legal Roads are also used as walking and biking tracks, including much of the Te Ara Pātaka network and several key tracks in the rural fringe behind Akaroa. There is a benefit to this co-use of land as grazing animals keep the Unformed Legal Road clear of vegetation, facilitating good conditions for recreational users with minimal maintenance. The Trust views maintaining good relationships with the occupying landowners as highly important, and is keen to work with them as policy develops.

Currently the Council has no policy on the use of Unformed Legal Roads. It does not actively recognise where walking and biking recreation currently takes place, nor identify where Unformed Legal Roads could be used to extend this network. It did however, include in its new Traffic and Parking bylaw the provision to close such Unformed Legal Roads to vehicles. The Trust welcomes this provision.

The submissions below cover some immediate actions the Trust wishes the Council to take to enact the new provision, and some longer term work to develop policy around use of Unformed Legal Roads for non-motorised public access.

4.4.1 Closing Unformed Legal Roads on Te Ara Pātaka to unauthorised vehicles.

Landowners have made it clear to the Trust (including at a seminar run last June to discuss Health and Safety issues) that they are generally happy with walkers, and to a lesser extent mountain bikers

along Unformed Legal Roads, but have extreme concerns about recreational vehicular use of the Unformed Legal Roads. This is due to their experiences of vehicles damaging the surface, getting stuck and requiring rescue, and the unwelcome behaviour that often accompanies vehicular access including alcohol, poaching and vandalism.

Frequent vehicular use of Unformed Legal Roads used predominately for walking and biking also degrades the experience for these users.

The Trust now seeks on behalf of both adjoining landowners and non-motorised recreational users that the Council exercise the new provision in its Traffic and Parking bylaw and closes all Unformed Legal Roads in the Te Ara Pātaka track network to vehicular use, other than those vehicles being used for land or utility management on the route. This would enable the gates on these roads to be locked, preventing other vehicles from access. A map in Appendix B shows the track sections where we wish this policy to be introduced. We request that work commences to introduce these closures in 2018.

4.4.2 Opening beach access at Otanerito

Currently there is no beach access available for walkers in the Hinewai Reserve to access Otanerito beach, the former access across private land having been closed. There is an Unformed Legal Road linking the Hinewai Reserve to the beach and the Trust requests that this is opened for public access. We understand that the adjoining Hinewai Reserve staff would be prepared to construct a walking track to the same standard as elsewhere on the reserve, if the Council would exercise its rights to open this Unformed Legal Road and hold discussions with the adjoining land owners to ensure that there is minimum confusion over its right to do so.

4.4.3 Developing policy on use of Unformed Legal Roads to extend the walking network

The Public Open Space Strategy identifies that a policy and guidelines around the use of Unformed Legal Roads for non-motorised recreation be developed. The Trust supports this work now commencing, including the specific identification of Unformed Legal Roads that should be used to extend the walking and cycling network.

The Trust offers to work closely with the Council to develop this policy and to identify Unformed Legal Roads that would provide good walking and biking linkages. The Trust is keen to extend the Te Ara Pātaka network around to Wainui and the Southern Bays, principally on Unformed Legal Roads, and to create more long distance walks from Little River creating connections to Te Ara Pātaka and a significant day hike loop from the township.

4.5 Use of the formed road network for recreational foot and bike access

Most of the peri-urban walking routes around Banks Peninsula communities such as Akaroa and Diamond Harbour make use of formed roads for short connecting sections between reserves. In the case of Akaroa, longer track sections are also routed on low-use back roads. Additionally many mountain bikers make use of the back roads for cycling. The Trust seeks to work in collaboration with the Council to identify where additional footpaths or other provisions for better walking and cycling access are needed.

The most pressing need is in Akaroa along Beach Road between the main Wharf to Takapuneke Reserve and Onuku Road between Takapuneke with the track leading to the Anglican Cemetery track. In Diamond Harbour a number of tracks cross Marine Drive or walk alongside it.

4.5.1 Roads of Natural Significance

A new concept that the Trust is promoting is the management of some remote roads for walking and biking in conjunction with biodiversity corridors. We envisage greatly reduced speed limits on these

roads to facilitate safety of cyclists, and a different management routine from generic slash and spray, aimed at encouraging the growth of natives whilst retarding exotics and weeds.

Three roads we suggest that this method is trialled on are:

- Long Bay Road where it passes through the Hinewai Reserve
- Summit Road from Sign of the Kiwi to Gebbies Pass
- Western Valley Road

5 Increased provision for biodiversity

The Trust has strategic goals to see

- Banks Peninsula become Pest Free
- Increase in protection for areas with high biodiversity values.

While the Trust supports the new quantity based targets introduced into the LTP to measure and monitor pest control at target sites, we seek a greater commitment than this from the Council to improving biodiversity enhancement on Banks Peninsula and realizing the benefits that this brings to the area as it seeks to transition to a low carbon economy..

5.1 Pest Free Banks Peninsula and Port Hills partnership

The Trust believes that a community based partnership model will be essential to achieve the long term goal of pest eradication and hence has joined the Pest Free Banks Peninsula Working Group. It will be essential that the work of this group and the methodology it develops are supported by the government agencies with funding and pest related strategies and work aligning with the Working Groups overarching strategy.

5.1.1 Goat eradication

The Trust is involved as a funding partner in the current push to eradicate goats from Banks Peninsula, recognising the significant threat they pose to native habitat in the area. The Pest Free Working Group has determined that feral goats should be the first pest to be eradicated, and one that is potentially achievable with current technology and a new hunting methodology recently developed.

The decision by ECAN to recognise goats as a feral pest in the recent Regional Pest Management Plan and to place more responsibility on landowners to contain domestic goats was critical to the Trust's decision to become the major financial backer of the new methodology trial eradication being carried out this year at Little Akaloa.

In making its financial commitment, the Trust signalled that it does not have sufficient funding to fund any further stages of the goat eradication. We have submitted to the ECAN LTP requesting their support for continued goat eradication, but also encourage Christchurch City Council to financially support our commitment to the trial by taking a greater funding role in the Goat Eradication project (currently being managed by the Pest Free Banks Peninsula Working Group and executed by the Department of Conservation). We would like to see Christchurch City Council to commit funding of at least \$35,000 toward goat control on Banks Peninsula in 2018-19 to support the Goat Eradication project, and then further funding in future years as determined by the Pest Free Banks Peninsula and Port Hills Partnership strategy to be developed in 2018-19.

Unless further funding from agencies is forthcoming, it is likely that feral goats will soon re-infest the trial area around Little Akaloa and could then spread back to other areas of Banks Peninsula that are currently goat free, undoing the investment in good work to date.

5.2 Protection for land with high biodiversity values

The Trust supports continued funding support for the Banks Peninsula Conservation Trust as a highly cost effective way to protect land with high biodiversity values, as indicated in the Parks and Foreshore Service Plan Community Participation Target 4[. The Conservation Trust works with private landowners to protect biodiversity with covenants.

5.2.1 Rates relief for covenant holders

The Trust submits that landowners who protect parts of their property with conservation covenants should have their contribution recognised by the Council through rates relief. We understand that at present rates relief is only available to whole property covenants, and suggest that this is pro-rated to covenants on part of properties, and the relief is clearly identified on the rates bill.

5.2.2 Strategic land purchase

The Trust seeks to work with Council to purchase land with high bio-diversity value where this also provides public access, but signals that its funds are prioritised and it does not have the capacity to fund strategic land acquisition solely for biodiversity. We are concerned that the Council does not currently appear to have a budget for biodiversity acquisition and aware of a significant loss of rare representative biodiversity on Kaitorete Spit due to a lack of timely intervention by agencies.

5.3 Transitioning to a low carbon City

The Trust supports the transition to a low carbon City as an identified Community Outcome. Banks Peninsula provides a “lung” for Christchurch, with the ability to absorb and lock-up large amounts of carbon through regenerating native forest. The Trust submits that the Council work with it and other agencies to get better recognition for the value of small covenanted areas in absorbing carbon to find ways to offset the city’s emissions, and to work with the government’s billion trees project to ensure that on Banks Peninsula such trees take the form of regenerating native forests, not further exotic plantations that can create erosion and weed issues.

6 Better Visitor Management

Banks Peninsula needs more recognition from the Council that it is a major rural tourism destination.

Many of issues and pressures on Banks Peninsula come from the rapid increase of visitors to the area, and the different ways in which they are using the place. FIT visitor numbers, campervans and cruise ship passengers have grown enormously over the past few years, but infrastructure to support the visitors has not kept pace, and there is no unit or team within the Council tasked with understanding and supporting visitor management.

This manifests in poor provision of information to visitors, poor planning for infrastructure improvements to meet demand, and poor visitor management, to the detriment of the environment that visitors come to see.

6.1 Tourism gateway signage

This has been highlighted to the Trust as it seeks to update the “Tourism Gateway Signs” installed by Council in 2016. These very attractive signs were the result of a long-standing project by the

Peninsula Community Boards initiated prior to the amalgamation that sought to provide welcoming information to tourists at various key locations around the Peninsula.

After years of delays with no department taking responsibility the signs were eventually completed by the Traffic unit, when many factual errors crept in.

In trying to work with the Council to update and correct these signs, the Trust has found they are now a political football, exposing there is no team within the Council tasked with supporting visitor management on the Peninsula and willing to accept ownership of them.

The Trust requests that responsibility for these signs is handed to a unit within Council so that it can work alongside this unit to update the signs. This is not an expensive project – the frames are installed and the content is on an adhesive overlay. The corrections need to be made and new overlays stuck on, so that visitors are given correct and relevant information.

6.2 Banks Peninsula Visitor Plan

The Banks Peninsula Community Board has highlighted the need for a Banks Peninsula Visitor Plan to be developed in its Community Plan.

Trust supports this concept, provided that such a Visitor Plan is based on robust data about visitor numbers, seasonal and activity patterns and the carrying capacity of the local areas visited. Most importantly, a unit within Council needs to be assigned to collect the data, develop the plan and take responsibility for Visitor management on Banks Peninsula. We expect such a Plan to also feed into the Regional Parks and Tracks work streams, recognizing that these are important visitor assets.

6.3 Freedom Camping

Freedom camping has been as controversial on Banks Peninsula as elsewhere in high tourism areas around the country. The difference has been that Christchurch City Council was slow to implement a Freedom camping by-law, and when it did, failed to consider whether the facilities provided near the areas it had designated as Freedom Camping areas could cope. The result was the by-law had to be revisited, and the area under the most stress, the French Farm foreshore, was degraded with a large volume of raw sewage entering the nearby waterway over a long period of time. Under the revised by-law non self-contained vans are not permitted to Freedom camp, but a visit to Akaroa on any night will show there are many small vans still parked up at the Recreation ground, and other areas of the Peninsula such as Stoddart Point at Diamond Harbour are also coming under pressure.

It has recently been made public that the Council only employs a Freedom Camping warden to ensure compliance with the by-law during the day on weekdays. However, compliance can only be measured at night and pressure is exacerbated at busy times like public holidays and weekends. We submit that the Freedom Camping warden hours should be in the evenings and on public holidays and weekends where control is most needed.

6.4 Public Toilets

The lack of public toilets on Banks Peninsula and the poor condition of the existing few a source of embarrassment to locals and a health hazard.

The Trust is concerned that the Council is re-opening public toilets in locations such as French Farm and Stoddart Point that have inadequate septic tanks for their usage levels, and proposes instead for pumping them out six monthly. BECA have identified that this is not best practice and that such septic tanks should not be emptied more than once every 3 years to allow anaerobic micro-organisms that drive the biodegradation time to establish in the sludge zones. It states that the quality of treatment can be compromised if a septic tank is frequently pumped out.

The Trust is particularly concerned about the lack of toilets at Tumbledown Bay. This has a safe sandy swimming beach and is popular with Christchurch residents and visitors. The foreshore area is private land belonging to Wairewa Rūnanga, who generously permit public access to the beach, provide parking on their land and have built an excellent walking track connecting the road to the beach. However, there are no public toilets and this is of concern to the Rūnanga who do not want their culturally sensitive land polluted with human excrement. The Trust strongly supports a public toilet being installed at Tumbledown Bay. We do not think this needs to include flush toilets or an expensive septic system, certainly not initially. A portaloos or composting toilet solution would do.

We note there is funding in the Long Term Plan for the Britomart Toilets in Akaroa, and question whether this is necessary as this public toilet has been overhauled relatively recently. We submit that funds for a toilet at Tumbledown Bay are developed using some of this budget or alternatively it is funded through a reinstated Regional Parks development budget, as such toilets would also serve users coming to and from adjoining Te Oka reserve.

7 Natural Heritage Strategy

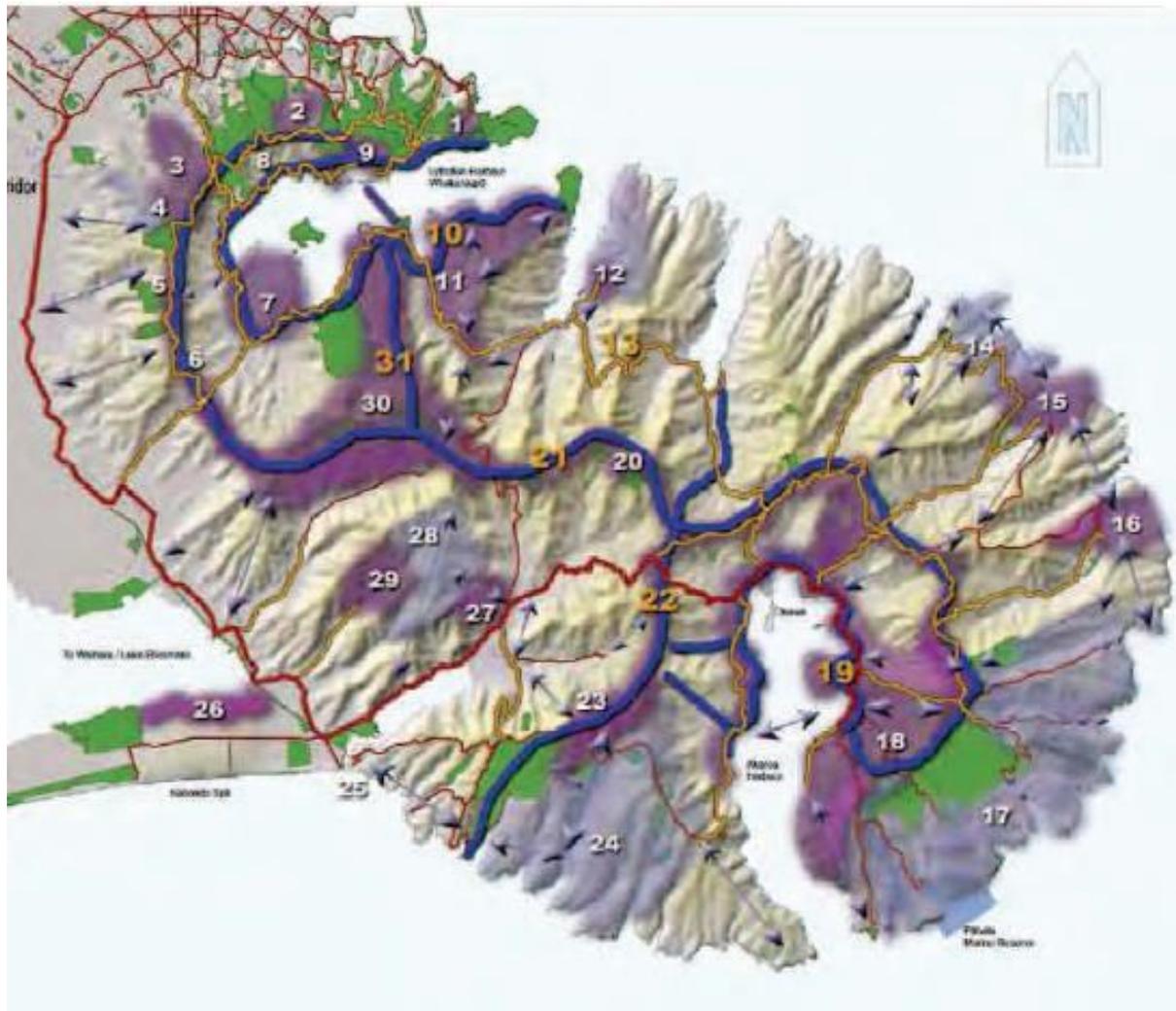
We understand that the Council is working on Natural Heritage Strategy to eventually replace and amalgamate the Public Open Space Strategy, Biodiversity Strategy and include Landscape issues. We seek to be involved in the development of this strategy and suggest that the issues around climate change and carbon sequestration also form part of it.

8 Looking forward

The Trust seeks to enter into discussions with the Council at both a governance and senior staff level to further work on implementing the shared projects envisaged for the next three years. Under the budget provisions made in its Statement of Intent, the Trust has sufficient capital funds to co-fund these projects and continue with its principal project to secure public access on Te Ara Pātaka and extend the network to across the western ridgeline of Akaroa Harbour and around the Southern Bays, creating a long distance trail connecting Christchurch to Akaroa and with a circular return route.

The Trust also signals that in achieving these aims it is likely to deplete its initial capital fund, and wishes to discuss its longer term future with the Council, and the shared projects that could be achieved over the 10 year period of the Long Term Plan.

Appendix A Public Open Space Strategy Map



CCC Public Open Space Strategy 2010-2040, p 46

Appendix B List of Unformed Legal Roads on Te Ara Pātaka for potential restrictions on vehicles

The map below shows the Te Ara Pātaka track network in green. Where tracks fall on unformed legal road that the Trust seeks vehicular access restricted to land management vehicles only are highlighted in yellow.



A description of these unformed legal roads is:

- Gebbies Pass to Packhorse Hut
- Mt Herbert Peak Road from Bayview Ave, Diamond Harbour to Mt Herbert summit
- Mt Herbert summit to Port Levy Saddle
- Port Levy Saddle to Pettigrews Road
- Monument Track from Purau-Port Levy Saddle to Kaituna Valley
- Packhorse Track from Kaituna Valley to Packhorse Hut