

**Submission to
Christchurch City Council**

**Ōtautahi Christchurch
Climate Change Strategy
Draft 2021**

and

**Te Mahere Rautaki Kaurera
Our Draft Long Term Plan**

**Submitted by
Banks Peninsula Native Forest/Climate Change
group**

**Comprised of representatives from
Banks Peninsula Conservation Trust
Lucas Associates
Manaaki Whenua / Landcare Research
Maurice White Native Forest Trust (Hinewai Reserve)
QEII National Trust
Rod Donald Banks Peninsula Trust
Orion New Zealand Ltd**

18 April 2021

Preface

The Banks Peninsula Native Forest/Climate Change group is an informal inter-agency alliance seeking to improve opportunities for biodiversity through native forest restoration on Banks Peninsula.

Group members involved in preparing this submission are:*

Organisation	Representative	Role/Qualifications
Banks Peninsula Conservation Trust	Maree Burnett	General Manager
Lucas Associates	Di Lucas	Director, Landscape Planner
Manaaki Whenua / Landcare Research	Larry Burrows	Forest Ecologist
Maurice White Native Forest Trust (Hinewai Reserve)	Bruce Hansen Hugh Wilson	Trustee Trustee and Manager
QEII National Trust	Alice Shanks	Central Canterbury Representative
Rod Donald Banks Peninsula Trust	Suky Thompson Bob Webster Bryan Storey	Trust Manager Trustee – Landowner participating in ETS/1BT Trustee – Geologist
Orion New Zealand Limited	Clayton Wallwork	Forest and Biodiversity Lead

We wish to make an oral submission in support of our written submission.

Address for service

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**Other local scientists/experts who have been consulted and involved in the group include Nick Head, Christchurch City Council Senior Ecologist and Helen Greenep, Environment Canterbury Biodiversity Officer for Banks Peninsula.*

1 Introduction

The Banks Peninsula Native Forest/Climate Change group is a collaboration of experts from organisations and agencies with knowledge of, an interest in, and/or responsibility for the protection and enhancement of native biodiversity and landscapes on Banks Peninsula.

The group formed in 2019 to explore the interface between native forest regeneration and carbon sequestration and to find ways to incentivise a change in marginal land use from farming to native forest, in particular through improvements to the Emissions Trading Scheme, so that setting land aside for sequestering carbon in permanent native forests becomes a financially viable alternative to pastoral farming and rotational forestry..

We have since made substantial submissions to the Climate Change Response (Emissions Trading Scheme) Amendment Bill, the Climate Change (Forestry Sector) Regulations 2008, the associated Select Committee process and more recently to the Climate Change Commission's draft advice and the Environment Canterbury LTP.

We strongly support the Council's draft Climate Change Strategy and urge that funding to begin implementing it is added to the Long Term Plan 2021-31, coming on stream from FY22.

We offer positive and innovative ideas that contribute to climate solutions for Christchurch and can be implemented immediately. We focus on areas identified in the *Programme 5 Carbon removal and natural restoration*. We submit that these ideas can be implemented cost effectively through existing budgets and community channels by giving greater support to initiatives that are already underway.

The Climate Change Commission has made it clear that work must start now to achieve the transformational and lasting change need across society and the economy. Harvesting the low hanging fruit on Banks Peninsula presents Christchurch City Council with a win-win for biodiversity, climate change and the economy.

We appreciate the funding proposed in the LTP for the Rod Donald Trust, Banks Peninsula Conservation Trust, Biodiversity Fund and Regional Parks. However, the funding allocated will only serve to support current levels of progress at best, not the step-change required to meet the transformational changes identified in the Climate Change Strategy. We therefore request that the Council makes the following changes to the LTP to enable implementation of Programme 5 as follows:

- Increase funding for the Banks Peninsula Conservation Trust - it is leading the core initiatives needed for landscape scale change for biodiversity on Banks Peninsula, implementing the Banks Peninsula Ecological Vision and Pest Free Banks Peninsula.
- Increase the Biodiversity Fund to support private landowners setting aside land for biodiversity.
- Allocate funding to support purchase of land for carbon sequestration in native forest, principally for natural native regeneration, potentially with additional grants to Rod Donald Trust.
- Improve planning regulations and compliance to support biodiversity and incentivise native regeneration and the attendant carbon sequestration.

Most of the funding requested above involves outsourcing work to community organisations and private landowners who are already working on these projects, so does not increase the Council's own workload.

We request that the funding needed is sourced through re-applying the climate change lens to some of the LTP big ticket projects comparing the value delivered by making the modest changes suggested above to speed up initiation of the Climate Change Strategy. We submit that all of the

above can be achieved with minimal impact on the overall budget of \$13.1 billion proposed in the LTP and will deliver runs on the board and very good value for the Climate Change strategy.

Banks Peninsula presents the Council with an opportunity to sequester large amounts of carbon in permanent native forest, create a massive sink for by 2050 when the City must meet its zero emissions targets.

2 Why we support the draft Climate Change Strategy

We support the draft Climate Change Strategy because the world now has less than 10 years to make transformative changes toward minimising global warming and the restoration of natural environments.

The Council declared its Climate and Ecological Emergency two years ago. It has developed a good strategy and we agree with the goals, principles and programmes that the Council has identified.

We suggest that the final principle for responding to climate change listed in the strategy is amended to show the Council's commitment to addressing the Climate and Ecological emergency by including a commitment to funding as follows:



We will support **and fund** positive and innovative ideas that contribute to climate solutions for Christchurch.

The thrust of our submission is that funding needs to be allocated **now** in the LTP so that existing initiatives by community groups and the private sector can be rapidly expanded. There is no need to wait for further strategy. The work is already in progress, is making a difference, but is held back by limited funding.

What we are suggesting are relatively minor funding changes relative to the total LTP spending, and that will deliver immediate and certain gains toward unlocking the vast carbon sequestration and biodiversity potential of Banks Peninsula.

3 Restoring Te Pātaka o Rākaihautū/Banks Peninsula

Environment Canterbury recently funded the Environmental Defence Society case study *Restoring Te Pātaka o Rākaihautū/Banks Peninsula*. This is an excellent report which identifies that the current regulatory and financial incentives pose threat to native biodiversity and the landscape and makes key recommendations¹ relevant to the Christchurch City Council LTP about how this can be turned around:

- Supporting initiatives of the Rod Donald Banks Peninsula Trust, Te Pātaka o Rākaihautū/Banks Peninsula GeoPark Trust, Banks Peninsula Conservation Trust and the work of others involved in covenanting and facilitating landscape-scale restoration projects
- Continue to support the work of the BPCT and others in covenanting and facilitating broader landscape-scale restoration projects
- Review the Christchurch District Plan, following active engagement with the community, to ensure it fully recognises cultural and natural landscapes including more comprehensively

¹ Peart, Raewyn and Woodhouse, Cordelia, Environmental Defence Society, *Restoring Te Pātaka o Rākaihautū/Banks Peninsula*, February 2021 p72

mapping the Outstanding Natural Landscape (ONL) areas

- Continue community engagement on the assessment and status of Sites of Ecological Significance (SESs) in Schedule B of the District Plan Our detailed requests below

4 Focus on natural regeneration for Banks Peninsula

We seek greater recognition in the LTP for the unique role that Banks Peninsula can play for Christchurch as a biodiversity hotspot and vessel for carbon sequestration through natural regeneration.

Banks Peninsula is approximately 115,000ha much of which is steep marginal land. Prior to European settlement, most of this land was covered in a dense native forest, and wherever the touch of humans is light, this native forest is rapidly and naturally returning. The combination of the terrain climate, existing seed sources and the birds to spread them, creates a haven for the natural regeneration. 15% of the Peninsula is now dominated by regenerating indigenous vegetation, naturally recovering from its low point of less than 1%.

The Peninsula therefore provides “low-hanging fruit” for Christchurch to achieve its goal of accelerating regeneration of the natural environment – ***through harnessing the natural process of regeneration.***

We are pleased that the Climate Change Strategy has identified a focus area for Programme 5 as:

Increase carbon sequestration through planting and natural regeneration of indigenous, and more fire resistant forest across Banks Peninsula.

We are pleased that the opportunity to achieve sequestration through indigenous forest and particularly through natural regeneration of indigenous forest on Banks Peninsula has been recognized. We encourage the Council to continue to make a clear distinction between the activity of planting and the natural process of regeneration in its biodiversity and climate work. Having clarity between these two different activities will be critical to getting new incentives and programmes right.

4.1 Planting

- Planting a native forest means that humans are in charge.
- Seedlings are grown in nurseries, certain species selected for planting and then planted out.
- Planting a native forest is not in this sense different from planting an exotic forest. It is a human construct with defined and documented parameters that can be easily measured by human tools.

4.2 Natural regeneration

- Natural regeneration, also known as rewilding or reversion means that nature is in charge.
- This is a completely different construct and not so easily measured by human tools.
- Seeds are spread by birds in an apparently random way, meaning the species mix can be much more complex and diverse.
- Regeneration happens gradually as the conditions become right for seed germination and survival.
- Regenerating forests gradually spread out from their existing margins rather than happening all at once, and typically follow a succession pattern.
 - Species such as bracken, bush lawyer, muehlenbeckia may appear first in grasslands, and once they have broken the sward, then sub-canopy tree species such as mahoe or kanuka follow.

- The role of humans is to assist nature, not to control the process

4.3 Natural regeneration is more cost effective

Planting natives is much more labour intensive and expensive than exotics such as pines or eucalypts. The seedlings are more expensive to grow and will generally not be a monoculture. The area to be planted must be well fenced to exclude grazing stock. Prior to planting competing vegetation such as grass must be completely removed or sprayed in advance. Then good holes need to be dug, the trees planted gently and with care, and mulches or weed mats applied to reduce grass and weed competition, and hare guards staked in place as most natives are highly palatable.

The planted natives then require quite extensive aftercare to ensure ongoing releasing from competing grasses and weeds for two to three years until a canopy is established. Even once the canopy is established, pest control to deal with browsers such as deer may be needed, and to achieve the full biodiversity benefits. Fences must be maintained to dissuade neighbouring grazing stock from entering and damaging the forest.

All of these costs and issues are exacerbated on steep marginal land which is hard to work on and often hard to get labour too.

Care must be taken to use eco-sourced native plants to avoid pollution of local genetic variations through the introduction of non-endemic varieties.

As we have already described, on Banks Peninsula natural regeneration occurs rapidly wherever nature is given a chance, once human action to remove it (such as spraying, cutting or grazing with goats) ceases. Regeneration of non-palatable species that can tolerate some grass competition happens even in pasture provided that it is near to seed sources and not subjected to human clearance.

Natural regeneration is therefore much more cost effective than planting (estimated at \$1,500 per hectare for natural regeneration compared to \$15,000 (or more) per hectare for planted native forest), as nature does the bulk of the work – growing the seeds and planting them – obviating the need for expensive human labour. Seedlings that thrive in any particular environment are those best suited to that environment, and a highly diverse species mix is likely to eventuate through natural regeneration, once grazing stock have been removed.

Aiming to afforest marginal land further tips the balance in favour of natural regeneration.

Pest and weed control and fencing are needed regardless of whether native afforestation occurs as a result of planting or natural regeneration, so these ongoing costs are similar for both methods.

For these reasons, we consider that natural regeneration should be the principal method by which Programme 5 aims to remove carbon and restore the natural environment.

Planting native forest should be principally seen as a tool to engage people and communities on easy front country projects.

There may be also be some situations where limited enrichment planting could speed the process of natural regeneration, and further research on this would be useful.

This is a link to a successful natural regeneration approach by the Hinewai Reserve as an example of how this can be achieved - <https://www.youtube.com/watch?v=3VZSJkbyMc>

4.4 Action is needed now

The Climate Change Strategy identifies that:

On Banks Peninsula, increased drought conditions will place the surface and drinking water supply under increasing strain, increase the risk of wildfires, and increase the erosion of soils, making revegetation more difficult.

Having more native forests on Banks Peninsula will encourage water retention, help to reduce the impact on water supplies, all of which are stream or spring fed and reduce the risk of fire and erosion. As the Strategy identifies, revegetation will get more difficult as droughts bite further. This creates an imperative to speed up and increase forest cover urgently and before it gets more difficult.

5 Increase support for the Banks Peninsula Conservation Trust and biodiversity initiatives it leads

Banks Peninsula Conservation Trust has been working since 2001 to support private landowners who philanthropically protect biodiversity on their property through conservation covenant. These covenants help to sequester carbon and to provide seed sources that further accelerate the natural regeneration process.

The role of Banks Peninsula Conservation Trust has now grown from private land owner support to to one of leading and coordinating biodiversity and conservation initiatives across the Peninsula, by implementing the Banks Peninsula Ecological Vision it developed in 2016. We seek greater support for Banks Peninsula Conservation Trust including Pest Free Banks Peninsula.

5.1 Increase the direct funding grant

Banks Peninsula Conservation Trust runs extremely efficiently, but staff still need to divert effort into the time-consuming and frustrating exercise of finding funding to support salaries and operational costs. A small increase in annual funding for the Banks Peninsula Conservation Trust would further increase the conservation gains it is making.

We support the current grant proposed of \$50,000 to the Banks Peninsula Conservation Trust, and ask that this is increased to \$100,000.

5.2 Integrate the Ecological Vision 2050 for Banks Peninsula/Te Pātaka o Rākaihautū into the Biodiversity Strategy

The Minister of Conservation launched the Ecological Vision 2050 for Banks Peninsula on November 2016. The Vision, first developed by the Banks Peninsula Conservation Trust, has met with wide acceptance and has been approved by a range of both Councils, and, organisations, agencies and trusts working across the Peninsula.

We submit that the Ecological Vision 2050 for Banks Peninsula/Te Pātaka o Rākaihautū is now integrated into the Climate Change Strategy and Council biodiversity planning and funding is allocated to assist with achieving the eight goals it sets out for Banks Peninsula.²

5.3 Reinstate funding for Pest Free Banks Peninsula

Controlling and eventually eliminating pests is another 2050 goal for New Zealand, and one that directly supports improved outcomes for biodiversity and increased sequestration as a result.

The previous grant of \$60,000 per annum to Pest Free Banks Peninsula should be reinstated for each year of the LTP and increased.

Pest Free Banks Peninsula is one of the finest examples of effective multi-agency and community co-operation, and is employing a growing number of people providing new jobs that are focused on the transformative changes needed rather than propping up business as usual activities. Christchurch City Council should continue contributing this modest level of funding to it.

² Banks Peninsula Conservation Trust, 2050 Ecological Vision for Banks Peninsula/ Te Pātaka o Rākaihautū including Port Hills

6 Increase support for conservation on private land through the Biodiversity Fund

The best and cheapest way to increase the area under conservation management is to partner with private landowners and covenanting agencies.

We are shocked to realise that although Programme 5 in the identifies the Christchurch Biodiversity Fund as one of the principal examples of what is happening already, **funding for the Biodiversity Fund has actually been cut in the LTP**, from the already miniscule sum of \$200k per annum to \$190k per annum.

As Programme 5 identifies, the fund provides grants to private landowners to protect and enhance sites of ecological significance. It is primarily used for fencing around covenants.

Fencing to exclude grazing stock is the biggest single up-front cost facing landowners wishing to set aside land as permanent native forest. On Banks Peninsula fencing is difficult and expensive due to the steep rock hillside with numerous springs and streams, with a median cost of \$28-\$30 per metre. Most covenants protect waterways and bush in linear gullies. The \$200,000 previously allocated to the Christchurch Biodiversity Fund per annum only pays for 50%-60% of 14 km of fencing. That is 4-5 covenants per year.

The funds are efficiently distributed with Christchurch City Council and Environment Canterbury co-operating with the two covenanting authorities, BPCT and QEII Trust. However, the funds available are insufficient, hotly contested, and fail to cope with the current demand of voluntary covenanting. Both covenanting agencies have waiting lists.

The most efficient way to achieve Programme 5 would be to support more covenanting on private land. We therefore recommend that the grant to the Biodiversity Fund is at a minimum doubled in FY22 to \$400k and increases each year thereafter.

7 Allocate funding to support the purchase of land for carbon sequestration in native forest

Programme 5 lists focus areas to:

- *Identify, protect and restore areas of significant indigenous biodiversity, and*
- *Create natural corridors between key forest/planted areas in Christchurch and Banks Peninsula to encourage biodiversity.*

Hinewai Reserve is identified as an example of what is already happening on Banks Peninsula. Hinewai exists solely because of private philanthropy, and we believe that the time has come when conservation needs to be a mainstream activity – carried out for financial purposes and for public benefit such as offsetting hard to eliminate emissions from organisations such as the Council.

7.1 Establish a Land acquisition fund

We believe Christchurch City Council should be purchasing or contributing to the purchase of land on Banks Peninsula for the purpose of creating more regional conservation parks – more places like Hinewai. These would be places where native biodiversity flourishes and regenerates and where the public are enabled to visit and enjoy low-carbon recreation in a way that respects the biodiversity and engages them in learning and guardianship.

We do not mean by this that the Council would necessarily own such parks. Instead, to reduce the land-owning risk and costs to the Council we suggest it sets up a land-acquisition fund as part of its support for biodiversity protection. The fund would be available for land purchases by conservation organizations for the benefit of biodiversity, landscape and recreation. The Nature Heritage Fund has not been open for applications from Canterbury for two years (the next funding round has not been advised). This has left landowners who wish to sell land with high biodiversity values on their

farms with no option but to sell for continued farming or exotic forestry, as at this stage conservation land rarely brings in an income.

There are known opportunities of land on Banks Peninsula with high biodiversity values that require the catalyst of funding from the Council. This would enable local Trusts to acquire such land for the public good, and landowners who would like to exit from land knowing that conservation and carbon sequestration is the best land use.

7.1.1 Additional support for Rod Donald Trust

Another efficient way to do support land acquisition would be to bring forward and increase the capital injections to the Rod Donald Banks Peninsula Trust.

This independent Trust has delivered excellent value for money over its 10 year existence to date and proved nimble when it comes to seizing land purchase opportunities in a way that the Council itself, constrained by the Local Government Act, cannot equal.

Christchurch City Council is planning to inject further funds into the Trust from FY 24 through its LTP, but these will only be sufficient to enable it to continue operating as it has done to date. Increased funding would give the Trust a large capital based and increase its ability to secure land for biodiversity and carbon sequestration in tandem with building community engagement and action through non-motorised public recreational access.

We suggest that the Council start with a contribution toward the Te Ahu Pātiki park that the Trust is currently crowd-funding for. This would enable it to notch up an immediate win, as the land is to come into the ownership of the Trust on 1 July 2021, the first day of the new LTP. This would provide a way for the Council to signal its commitment to biodiversity and carbon sequestration and be directly associated with a new highly visible and popular regional park, without the ongoing responsibility of ownership.

8 Support for Regional Parks

We support the funding for the Regional Parks team. This group does an excellent job of supporting biodiversity initiatives in the area, but is always constrained by funding. Further funding would enable more weed control initiatives and the more rapid development of the Misty Peaks and Te Oka Reserves

9 Improve the regulatory and compliance framework

Earlier we stated that native forest is rapidly and naturally returning. The changes we have described above are those that support people to work with nature to support this regeneration.

The changes we request under the regulatory and compliance framework are for Christchurch City Council to ensure its regulations adequately protect native vegetation and that deliberate destruction of established native vegetation contrary to the regulations is followed up and penalties imposed.

Recently there has been a disturbing trend of spraying large stands of native vegetation to improve pasture. This is counter-productive to the goals set out in the Climate Change Strategy and LTP. We share the concerns of the Environmental Defence Society that the permissive new standards introduced through the National Environmental Standards for Plantation Forestry (NESPF) present a threat to the landscape and biodiversity on Banks Peninsula.

We support the recommendation of the Environmental Defence Society that the Council:

- Review the Christchurch District Plan, following active engagement with the community, to ensure it fully recognises cultural and natural landscapes including more comprehensively mapping the ONL areas

- Continue community engagement on the assessment and status of SESs in Schedule B of the District Plan

We ask that these matters are funded through the LTP.

We also ask that the Council advocates to central government for improvements to the Emissions Trading Scheme to make the registration of naturally regenerating areas easier. This is key to unlocking the huge potential for Banks Peninsula land use to shift from pastoral farming and exotic rotational forestry to carbon sequestration in permanent native forest to create a massive sink for Christchurch by 2050 when it must meet its zero emissions targets.

10 Conclusion

The Climate and Ecological emergency has been recognized at both the national and Canterbury level.

The Banks Peninsula Native Forest Climate Change Group asks Christchurch City Council to recognize the role that Banks Peninsula can play as it shifts the regulatory and incentive framework toward one that supports carbon removal and natural restoration and to help fund this change.

The only thing stopping Banks Peninsula becoming cloaked once again in native forest is human activity.

The Banks Peninsula Native Forest Climate Change group supports the Council's draft Climate Change Strategy and urges the Council to start implementing it now through increased funding to initiatives and programs already underway on Banks Peninsula.

With appropriate support from Christchurch City Council a shift from pastoral farming and exotic forestry to native forest regeneration on marginal land could be rapidly achieved and on a landscape scale, creating massive gains for biodiversity, climate change mitigation and adaptation and drought resilience. This would position the Council well to meet its Climate Change targets, particularly the need to deal with those residual emissions that cannot be eliminated through reductions by 2050.