Deputations

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
50054	The Board notes that there appears to be nothing in policy on how to deal with dead trees or tree stumps once they have been cut down.	Paul McMahon
	2. After trees have been cut down, the roots are often still growing and can cause issues with infrastructure. The Board ask that consideration be given to including something within the policy for disposal of stumps, where necessary.	
	 Planting more trees require higher service levels for clearing the stormwater network. The Board queries whether this has been taken into account in costs of implementing the policy and asks if it has been what the costs of those increased service levels are. The Board would like to see existing trees retained unless there is a sound ecological reason for their removal. 	
	5. The Board strongly endorses, the principle of when removing one tree, two more trees are replanted.	
	6. The Board endorse Goal 2 of the action plan to base tree selection on species' needs and attributes that benefit the immediate environment (2.3).	
	Full submission attached.	
50285	Please see attachment for details and full submission.	Selena Coombe
50484	Full submission attached.	Deb Clarke
50539	Submission attached.	Prof Dr S S Bagchi
50540	Submission is in the attached document.	Graeme McCarriso
50541	Please see attached submission.	Marie Gray
50548	Submission attached.	Irinka Britnell
50579	I have very hurriedly made my comments in an attachment which are to be read in conjunction with the Opāwaho Heathcote River Network Submission. I would want to be heard in any further citizen or expert assembly on this.	Colin Meurk

	Community Board
	Waitai Coastal-Burwood- Linwood Community Board Submissions Committee
	Styx Living Laboratory Trust
	Greater Hornby Residents Association
JP	Avonhead Community Group Inc.
on	Spark New Zealand Trading Limited
	Summit Road Society
	Englefield Residents Association
	creative transitions to
	sustainable futures

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
50580	What I would like to say is that with urban forestry please pay consideration to the social justice side of landscape planning as trees can do so much	Georgina Stanley
	more than just provide shade.	
	We recently been gifted \$2,000 by Orion and have ordered 40 trees that we would like to plant in local community parks. We initially thought that	
	street planting would be a good idea but have on further engagement found that participants felt this could lead to unwanted trespassing.	
	This is my first time submitting for any plan- if there is any opportunity to present orally i would appreciate it as i, am much more concise in verbal	
	form.	
	Retionale Behind targeted Streets: Street engagement has been put on hold as engagement process has identified that participants did not feel safe or	
	comfortable giving the public the opportunity to enter their properties together fruit.	
	The long-term sustainability of the project will be the Trusts ability to provide maintenance and ongoing support for the loop trees. We are proposing this will be able to be achieved through a Social Enterprise, we are establishing a nursery with the aim of propagating 1200 fruit trees a year. Growing	
	and grafting specific parks trees will be a sideline of this enterprise. With the majority of the trees being sold to the public to fund the development of	
	the loop.	
	We aim to plant 50-70 fruit trees a year in public parks throughout the Fruit Loop for 7 years. Totalling 350 -490 fruit trees established and maintained	
	In public spaces and 8,400 sold to residents.	
	Full submission attached.	
50596	Submission to: Our Urban Forest Plan for Ōtautahi Christchurch 2023. See attachment for submission.	Penny Carnaby
	On behalf of: Banks Peninsula Conservation Trust (BPCT)	
	If there are public hearings, we wish to appear in person to support this submission.	
50597	Submission to: Our Urban Forest Plan for Ōtautahi Christchurch 2023	Penny Carnaby
	On behalf of: Banks Peninsula Native Forest Climate Change Group (BPNFCCG)	
	If there are public hearings, we wish to appear in person to support this submission. Full submission is attached.	
50603	Attached is Federated Farmers' feedback on Our Urban Forest Plan for Otautahi Christchurch 2023.	Lionel Dr Hume
51067	See submission attached.	Greg Partridge

Community Board
Smith Street Community Farm Trust
Banks Peninsula Conservation Trust (BPCT)
Banks Peninsula Native Forest Climate Change Group (BPNFCCG)
North Canterbury Province, Federated Farmers of New Zealand

Community Boards

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
50009	The Waimāero Fendalton-Waimairi-Harewood Community Board thanks the Council for its work in preparing this Plan and for the opportunity to give feedback.	Linda Chen
	If the Council holds a hearing on the Plan, the Board would appreciate the opportunity to speak.	
	The Board suggests that the name 'Urban Forest Plan' might be confusing for residents, and recommends that the name be changed to include the phrase "tree canopy" since enhancing the city's tree canopy is the primary focus of the Plan. The phrase "tree canopy" is becoming widely understood in the community but "urban forest" is not.	
	The Board would support the Council producing visual imagery to demonstrate what the tree canopy might look like in fifty years if this Plan is implemented.	
	The Board commends the proposal to produce clear guidelines for tree planting to make sure that the right trees are planted in the right place. We continue to deal with numerous problems caused by historic decisions to plant inappropriate trees in inappropriate places, which go on to cause considerable stress and costs to both the Council and private property owners. There is no joy in removing mature trees, but sometimes it is the most practical solution in these cases. If we can address these legacy issues, while increasing our tree canopy and avoiding these issues in future, that would be a significant measure of success.	
	The Board's view is that the best way to enhance the city's tree canopy will be to ensure that new trees complement, rather than restrict or compete with, how our communities want to use the space and we support the initiative to produce guidelines around this.	
	The Board suggests that the Council pro-actively engages and collaborates with communities who want more trees in their neighbourhood to develop and implement tree planting projects in those areas. The success of a project like this could then inspire other communities to do the same.	
	The Board endorses an increase in tree diversity. The Board suggests that the Council produces guidelines and collaborates with the community to raise awareness of what different species can look like when fully mature, the impact they will have on the surrounding site and the maintenance required, so people can make informed decisions about what trees to plant.	
	 The Board has the following specific suggestions and requests: That the wording "Our urban forest is nurtured by partnerships, participation and good role-modelling" be included in goal 4. Our intention for this is to show that the Council needs to set a good example in managing its own trees and being accessible to provide advice. The Board seeks further information about how the Council will implement the 'involve' goal, specifically relating to "encourage communities to actively participate". For example, will this involve direct funding support for communities to plant more trees, or will it involve celebrating and recognising the efforts of volunteers? 	
	The Board would support the Council considering converting under-utilised Council parks, reserves and/or vacant land into forest settings, perhaps similar to the Addington Bush example.	
50231	Please find submission attached.	Emma Norrish
50556	Please refer to attached.	Callum Ward

Community Board
Waimāero Fendalton-Waimairi- Harewood Community Board
Waipapa Papanui-Innes-
 Central Community Board
Heathcote Community Board

Organisations / Businesses

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name	Organisation
49634	More trees please! Shade. Green corridors. Air beneath trees is cooler than AC indoors, healthier, zero energy and net carbon negative. Plant now to	James Clark	Tikambimanie
	enjoy sooner!	- 1.0	
49685	Strongly support street tree planting. Just as important is finding ways to support property owners with maintaining trees on street frontage or that	Paul King	Architecture Prime Ltd
	are on private tand but of a size that gives them wider heighbourhood impact. Currently the incentives are powerfully towards removing trees due to the exponse of professional appual pruning (topping, and/or disposing of the green waste generated. Beeple maintaining trees on street frontage or on		
	nive expense of professional annual pruning/topping, and/or disposing of the green waste generated. People maintaining trees of street nontage of on nrivere property where they are of a size that benefits the wider area, should be supported with larger green bins at no extra cost, an annual allowance		
	for green waste dumping, and assistance with annual pruning costs.		
49698	The Manuel Pour Family Whanau Trust request an independent internal investigation audit to be carried out for failures to comply with the laws set	Francis Pou Maroroa	Manuel Pou Family Whanau
	which already exist Obey honour The international law rules regulation legislation policies obligation legislative KAWANATANGA MAHI DUTIES which		Trust
	applies too:		
	- The Human rights		
	- The Bill of rights		
	- THE class action sections13		
	THE contra profeentem principle applies to THE OEEICIAL INDIGENOUS INDEPENDENT LAW HE WHAKAPUTUNGA HE WHAKAMINGA 1835 act WHICH		
	TAKES PRECEDENTS HOLDS PRINCIPLE OF ALL TANGATA WHENUA HAPUS communities ASSETS ROYALTIES TAONGA REVENUES TAX GST OF		
	AOTEAROHA SHORES in the official TE TIRITI O.WAITANGI AN ITS 4binding articles officials constituted contract agreement founding founded		
	documentation sworn in on oath 06.02.1840 te tiriti o Waitangi marae grounds PAIHIA BAY OF ISLANDS FAR NORTH		
	THE MAORI AFFAIRS TRUSTED DRAFTED DEEDS VESTING ORDERS BILL 1953 ACT		
	THE FAMILIES CARE AN PROTECTION 1989 ACT		
	TE TURE WHENUA 1993 ACT ADHERE ABIDE COMPLY talk to mana whenua who have aotearohas best interests at heart mahi TAHI KAIMAHI kaitiakis		
	AOTEAROHA		
49731	am all for the planting and maintaining of trees in public and private spaces however I believe it is wrong to separate rural and urban	Hamish Wheelans	Yoursection Ltd
	environments within the Christchurch boundary.		
	We need to be considering how the rural environment can help the urban environment to achieve environmental outcomes.		
	With intensification of urban areas, the planting of large trees with significant canopy will become more difficult.		
	If there is an option to allocate the provision of trees from urban to rural environments, planting and maintenance costs will reduce for council whilst		
	at the same time enabling increase in overall sequestration.		
	The proposed Financial Contributions must allow the planting of trees in the Christchurch District as an offset rather than being site specific.		
49790	I applaud this Plan and would like to see it succeed. Full submission attached.	Andrea Davis	Andrea Davis Landscapes
	As we know even mature trees, we can save helps keep the big diversity bridges through our unfortunate sprawl. There are a few things I would like to		
	emphasis or highlight		
	1. Equity=Increase the canopies in the poorer communities. I see the plan has this highlighted, however I just want to emphasis there are more		
	requirements to ensure a tree will survive in rough neighbourhoods. I grew up in Manhattan and watched may trees come to their death if they do not		
	have protection around them. see photo. Water trucks can save trees in the first two years after planting.		
	2. Changing ground water levels- Our city is a marsh; the old Pacific Park subdivision is a resource for what can grow in our higher ground water levels.		

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
	Almost all of the introduced trees have died, except the Albizzia Silk Trees and Palms, while all of the natives are thriving, especially Ngaio, Cabbage and Olerias.	
	3. Water Storage for our trees. It is hard to imagine but one days Christchurch may be restricting water all summer, which means we need a way to keep our new tree plantings alive. Homeowners and Parks should have rain harvesting with tanks encouraged on new buildings or properties calling for lawns.	
	4. Not all trees are created equal- I see developers cutting down highly valuable exotic or native trees because they do not know anything about tree varieties and how long some take to grow. The act we have the highest percentage of Silver Birch over Pin Oaks is one example. Silver Birches should be removed at every opportunity. We also have a problem with the highly allergenic flowers of hedging plants that become tree. Namely, Privet, Laurel, Photinia.	
	5. Rules for Developers - this is expected by developers across the first the world. Trees are not allowed to be removed because the townhouses need boundary to boundary space. Designs must include the mature trees as a feature and asset to the development. Rules for any business car park must include successful tree pits to grow shade trees and filter storm water. Spotlight Mall/ The Colombo managed to plant Oaks and every single one died in the first years. Never to be replaced and cars swelter in summer on that lot. Hefty fines if rules are broken.	
	6. Hours needed in the Plan for trained specialist to identify trees- I would offer free hours to help get ahead of the developers with tree identification and registering important trees. I know we have some protected trees however; I have seen many sites that have old rare trees with no protection. As stated in the plan professionals like me need to stop clients homeowners from planting the wrong trees or trees to close to buildings and drainage that inevitably are removed after 20 years. Strategic planning with quality tree inventories in our city, must be part of the Urban Forest Plan.	
	See additional photos attached.	
50012	Heritage New Zealand Pouhere Taonga supports the Ōtautahi Christchurch Urban Forest Plan and commends Council on proactively undertaking an initiative which will increase community wellbeing and add resilience to the impacts of climate change.	Fiona Wykes
	In particular, we would support and encourage the following aspects: - The location of new planting is such that trees can reach maturity without having an adverse effect on heritage items and spaces. - All tree planting projects are reviewed by the Council's archaeology panel to avoid disturbance in known areas of archaeological interest. The tree planting scheme represents the different cultures resident in the situand its surrounds.	
50103	Please see attachment for details and full submission.	Rosa Verkasalo
	Te Mana Ora strongly supports the proposed Ōtautahi Christchurch Urban Forest Plan. Te Mana Ora commends the comprehensive nature of the plan and the consideration of many aspects relevant to the health and wellbeing of individuals, the community, and the environment.	
	Te Mana Ora recommends that the Christchurch City Council considers becoming a Biophilic City, or National Park City, or Green City, as mean of integrating the ethos and understandings encapsulated within Ōtautahi Christchurch Urban Forest Plan across the whole of Council.	
	Given the considerable health benefits that trees and green spaces provide, it is important these areas and connections with the environment can be accessed equitably throughout the city. An inequitable distribution of parks and other green spaces could increase poorer health outcomes for people on lower incomes. As details for the Ōtautahi Christchurch Urban Forest Plan are further outlined and implemented, Te Mana Ora recommends careful prioritisation of neighbourhoods and areas which currently have less access to green spaces and tree canopy cover.	
	Te Mana Ora strongly advises against the planting of allergen-producing trees such as silver birches. Pollinating trees and grasses are a concern for those with seasonal allergies and asthma. Changes in the climate have also increased the risk of thunderstorm asthma in New Zealand, where a significant thunderstorm coincides with high-levels of pollen in the air, triggering asthma-related symptoms.	
	Te Mana Ora notes that, as mentioned in the plan, mature tree roots can cause damage to infrastructure such as footpaths. Tree roots can cause footpaths and streets to buckle and become uneven, which is of concern for those with limited mobility, have a visual impairment, use a wheelchair or	

Organisation
Heritage New Zealand Pouhere Taonga
Te Whatu Ora (Health NZ) and the National Public Health Service

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name	Organisation
	pram. Ensuring that public infrastructure is maintained enables access to services at all levels and enables participation by people of all ages and abilities.		
50324	Full submission attached. Ōtautahi Community Housing Trust ("OCHT"), at the address for service set out below, thanks Christchurch City Council for the opportunity to submit on the Ōtautahi Christchurch Urban Forest Plan "Urban Forest Plan"). This letter provides the substantive detail of OCHT's submission on the Urban Forest Plan.	Ed Leeson	Ōtautahi Community Housing Trust
	Key Summary of Submission OCHT welcomes the Council's recognition of trees as a key element in successful urban environments. This aligns with our internal landscape design guides which inform all our projects and the need to integrate landscaping with housing.		
	OCHT strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where. intensification has and will continue to occur. Such renewals should include kerb and channel replacement, undergrounding of overhead wires, and street tree planting.		
	OCHT does however have concerns with aspects of the plan regarding having a 20% target that is fundamentally unachievable in medium density environments on private land, and with the reliance on Financial Contributions in PC14 as an implementation method when this FC has yet to be tested through submissions and hearing processes.		
50390	Full submission attached.	Dugald Wilson	Laura Kent Volunteer Workgroup
50398	The Victoria Neighbourhood Association agrees with and supports the Principles and Goals of the Plan. We also support many of the Actions, although some are not ambitious enough or the time period is too long. We urge the CCC to (i) ensure all actions, incentives and regulations are specific and significant enough to make a real difference (e.g., the Financial Contribution) and (ii) treat trees like any other valuable and vulnerable asset. The current and planned intensification across the city is going to make this a real challenge, unless Council and CCC planners are prepared to strengthen (and then use) their authority. SPECIFIC COMMENTS, SUGGESTION AND PHOTOS ARE ATTACHED.	Marjorie Manthei	Victoria Neighbourhood Association Inc
50431	Full submission attached.	Kit Doudney	Avon Heathcote Estuary Ihutai Trust
50479	Full submission attached.	Malcolm Long	Ōpāwaho Heathcote River Network
50481	The Avon-Ōtākaro Forest Park strongly supports the Urban Forest Plan and is looking forward to seeing the plan being actioned in the near future.	Kelly Perazzolo	Avon-Ōtākaro Forest Park
50498	Please see the attached document for our groups' submission.	Ella Peoples	Forest & Bird Youth Christchurch
50506	Full submission attached.	Defyd Williams	Papanui Heritage Group
	Our submission in summary: In general, we support and endorse 'Our Urban Forest Plan', but raise some issues of concern around the level of protection for existing trees in Papanui, especially those on private land, the trees on the 15 Memorial Avenues in Papanui, plus the tree-lined streets which adjoin them.		
50514	To quote something I saw "there's a magic machine that sucks carbon out of the air, costs very little and grows itself- it's called a tree !!!!	Louise Woolley	GHRA
50523	Please see full submission attached. That the plan looks at what can be done to enhance the motorways leading into and out of Christchurch. In particular the new Christchurch Northern Corridor (CNC) which is planted out mainly in grasses where there is great opportunity to create a forest corridor. This same theme could be extended to other motorways like the Northern Motorway. This forest corridor should flow out and connect with existing areas (like Ōtukaikino Wildlife Management Reserve) and the soon to be constructed Belfast Stormwater facility. Planting of native trees along the CNC would enhance the cycleway experience and help buffer adjoining residential areas.	Matthew Brosnahan	Living Memorial Trust
50527	Please see the full submission attached.	Rose Nutira	Te Taumutu Runanga
50532	We are a social enterprise that works in the community and environmental wellbeing space. Our biggest current project is a Regenerative Communities Pilot based in the King George V Reserve – a Christchurch City Council reserve in South Christchurch. See the full submission attached.	Mark Gibson	Flourish Kia Puawai Social Enterprise Ltd
50538	Please see attached PDF.	Dave Kelly	Beckenham Neighbourhood Association Inc

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
50551	Excellent plan. We support community lead planting and maintenance initiatives	Hayley Guglietta
	We support increased biodiversity and plantings in all public spaces	
	We support prioritization of Green infrastructure over grey infrastructure	
	We support the retention of existing trees with the caveat that regular maintenance is a must on public streets	
	We would like to see Stronger incentives for developers and private land owners to retain existing trees	
	A stronger connection with the MOE and schools to include them in this plan	
	A stronger locus on maninga karmcorporating Fruit trees in every public space as part of the canopy cover	
	Our only concern is that areas such as residential Red Zone is a massive opportunity to contribute to an increase canopy cover but will never be	
	counted as it is a wet land, perhaps allowing for increased wetlands incorporated in the goals would be sensible not just set aside as a separate issue.	
50552	We run a school Program to teach children about biodiversity and each winter we arrange a number of planting days within the school focused on	Lesley Hurst
	Native Pollinators. The MOE and Schools should be a stakeholder in this plan.	-
	Other than that this is a great policy document	
50553	Mahaanui welcomes the opportunity to provide feedback and commentary on this draft Plan to CCC. To note, Mahaanui has also reviewed an initial	Henrietta Carroll
	draft of the Plan on behalf of the Papatipu Runanga.	
	Our full submission is attached. We would also like our submission to be heard	
50555	Please see attached submission	Alice Shanks
50555		
50560	This Plan is full of high-sounding words and phrases but will actually go NOWHERE because the Planning and Resource Consents Department is anti-	G Wilson
	trees, anti-landscaping and totally subservient to the so-called "developers" whose sole aim is to enrich themselves as they completely denude land	
	they buy - and the Planning and Resource Consents Department does not give a damn about residents and the ambiance of the area "developers" are	
	destroying. Residents are never consulted about the destruction of the local ambiance.	
	Goal 1 Plant ACTION 5 mentions council projects and planning documents. What about residential planning documents? SILENCE !	
	How can we retain existing cover if "developers" are allowed to clear fell and nav a token sum instead of replanting?	
	The and pay a token sum instead of replanting:	
	This is the complete opposite of ACTION 7 which talks about incentivising and supporting private land owners to retain and plant.	
	ACTION 8 allows "developers" to NEGATE ACTION 7 - Using the sum of money paid by "developers" to replant elsewhere is NOT going to benefit the	
	residents of treeless "developments". If there is not even enough room for the three bins, there will definitely be NO room for trees.	
	If the planners need to oversee intensification this ought to not lead to treeless streets. Where will the trees go on the former squash club site in Matipo	
	Street? There is NO room.	
	What is the AMOLINT "developers" have to pay? If it is not a large amount, then there is no incentive to plant or retain mature trees already on the site	
	what is the AMOONT developers have to pay: In this not a targe amount, then there is no incentive to plant of retain mature trees aready on the site.	
	How can council ensure corridors of trees running through intensification? There is no answer given in this document.	
	If trees are critical to infrastructure, why are "developers" allowed to opt out?	
	Our area of Central Riccarton is routinely being denuded of trees and even of shrubs, courtesy of Planning and Resource Consents department and a	
	few token saplings are planted hard up against buildings in what is effectively a bed of concrete with a result the roots cannot grow. And "developers"	
	will be allowed to get away with paying a token sum of money and some trees will be planted ELSEWHERE as determined by Planning and Resource	
	Consents department! What a sick joke. The 'Garden City' will be a CONCRETE JUNGLE with some trees on the periphery.	
	Evidence for this is clear - a Russian with plenty of money comes to Christchurch and cuts down an urban forest a century in the making on Clyde Road	

	Organisation
ta	Avon Otakaro Network
	Bee Awesome
oll	Mahaanui Kurataiao Ltd
	Canterbury Botanical Society
	Central Riccarton Residents' Association Inc

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
	near the Riccarton Road intersection so that he can enrich himself even more. And our city council lets this blatant destruction of tree cover and	
	blatant destruction of the environment take place without even a murmur.	
50563	As a coastal suburb who is also affected by ground water issues from surrounding hills, we would be interested to understand what planting would be suitable for our environment? We have the ability to plant the open areas above the village but the planting in the village itself is very diverse (public planting varies from Pohutakawa, cherry trees and Douglas fir). Some trees thrive but there has been some die off off of other varieties along the Coastal Pathway. More education for locals on what would be appropriate would be very welcome as this will encourage both diversity and a theme of local identity. With this the community can support the CCC Urban Forest plan with supporting and complimentary planting within their own properties and the ability to protect the environment of the trees to help them thrive.	Charlot Hudson
50564	Please refer to the attached document from Christchurch Civic Trust	Ross Gray
50565	Full submission attached. The [Royal] Forest and Bird Protection Society, with its mission to protect New Zealand's unique flora and fauna, celebrates its centenary this year. The North Canterbury Branch of the Forest and Bird Protection Society has been operating since 1946 and is active in restoration, pest control and supporting the community conservation. We work from the Lewis Pass Reserve to the Rakaia River, where we share an interest with the Ashburton Branch.	Diana Shand
	We welcome this opportunity to submit on the Christchurch City Council Urban Forest Plan 2023.	
	Our Branch strongly supports the sentiments of the Plan, and the use of natural solutions to both mitigate and adapt to climate change by increasing the tree canopy cover within the city. We would urge the Council to be even more ambitious in its goals. We see this as an investment in infrastructure and a contribution to objectives and policies in our national, regional, and local legislation and plans and strategies to achieve these.	
	We appreciate the opportunity to make the following submissions:	
	1. Frameworks: The understanding that this plan provides Nature Based Solutions now internationally recognised as one of the most powerful tools to use in addressing climate change(see https://www.iucn.org/our-work/nature-based-solutions and https://www.forestandbird.org.nz/campaigns/adapting-climate-crisis, should be explicit, and highlighted in this Urban Forest Plan, as should its role in fulfilling obligations under the Resource Management Act and National and Regional Policy Statements, and strategies such as the Christchurch Climate Resilience Strategy and the Christchurch City Council's Biodiversity Strategy.	
	2. Leadership in biodiversity protection: While we acknowledge that exotic trees species are an important part of this plan, we see this as a major opportunity for promoting, and for celebrating, our own indigenous biodiversity. The Christchurch City Council's Biodiversity Strategy identifies that "The Councils indigenous biodiversity priorities are to protect existing biodiversity in threatened land environments and to protect existing habitats for indigenous Biodiversity and nationally and locally threatened species" and "The Council has a leadership responsibility in the protection of and enhancement of indigenous biodiversity in Christchurch and Bank Peninsula."	
	This delineates a particular responsibility in the Urban Forest Plan, and we strongly recommend the use of, and active promotion of the Ecosystem Mapping supported by the city in the past. (The mapping resulted from cooperation between the community group Christchurch-Otautahi Agenda 21 Forum and all the Community Boards and realised in the work of Lucas Associates, was adopted by the City https://ccc.govt.nz/environment/land/ecosystem-map	
	This Ecosystem Mapping approach with its integral scientifically researched basis for the ecosystem planting, was disseminated in a way that was accessible to everyone, and this approach is endorsed. On-line access AND printed booklets allowed residents to look on the maps and find their own sections to find the appropriate planting, even in shady or sunny parts, and the food for native birds and other fauna. Booklets were available at Community Centres and Libraries and plant lists at every plant centre (with many Plant centres taking this aboard with enthusiasm and supporting it with the appropriate eco-sourced plant stock. Forest and Bird were active in promoting this and making sure that weed problem plants were discouraged in plant centres.	
	3. Eco-sourcing responsibility: Noting that Biodiversity is accepted to include 3 levels, genetic diversity, species diversity and ecosystem diversity, we seek that the careful consideration be given to eco-sourcing the native species used within the plan. The importance of eco-sourcing has been	

	Organisation
n	Sumner Community Residents' Association
	Christchurch Civic Trust
	North Canterbury Branch, Forest and Bird Protection Society

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
	highlighted in previous submissions and reference made to correspondence between the Canterbury Botanical Society and Environment Canterbury regarding an urgent call for a Canterbury Regional Policy on eco-sourcing plants (November 2018); and the Canterbury Regional Council Guidelines for native plant procurement and eco-sourcing (August 2019). 4. Avoid invasive species proliferation: As said, we acknowledge that exotic trees species are an important part of this Plan, as important to the wellbeing and cultural heritage of the city. However, we submit that rigorous consideration is required to prevent planting to become the source of future weed and invasive pests, especially given the climatic changes we face in the future bringing winds, floods and new fauna. 5. Sponge city: Adaption to climate change alerts us to the need to recognise rising sea levels, and the importance of coastal wetlands and much maligned "swamps" in absorbing some of this erosion of the City's past coastal and estuarine profile. We urge that this be considered an opportunity to restore biodiversity and natural habitat for our indigenous fauna which have been squeezed out in the past. Estuarine areas should be specifically restored and enhanced to this end, and we urge the city to realise, now, some of its long-term planning for this work. We also note the opportunity to revisit and revive the CCC Parks Units own 1990's Waterways Enhancement projects managing urban streams as natural ecosystems.	
50571	I support the submission in its current state. I do feel there is an element that is missing and hasn't been considered.	Celia Hogan
	Trees not only sustain us they are our teachers too. They teacher us from childhood all the way through to adulthood. Much of this plan is focused on adulthood and the children have been forgot in one keyway. Children like to play in trees. AKA climb trees and build huts under them.	
	that can be held onto, the branches are close together and can be held easily. When planting it is also worth considering planting for play. Making it interesting with paths or little nooks to play in.	
	Many trees in the parks and reserves around the city have their lower limbs cut off. While I know it will get to be many years before this comes to fruition, it is an extremely important consideration and will contribute towards the wellbeing and resilience of our tamariki.	
	One of the views I argue back on is that children might break the branches of the trees so we don't want them playing in these areas.	
	For GOAL 2 - if you want to nurture our trees then children need to be considered and involved as they are the future kaitiakitanga. If they are not encouraged to play in those spaces, then how will then learn about them. They need to spend regular time connecting with nature to love it and become the future gaurdians. For the sack of a broken branch as a child, they will save a forest as an adult. This supports GOAL 3.	
	To achieve GOAL 4 I would like to see involve not just communities but children specifically. Children don't appear to be mentioned throughout this plan.	
50600	Please find attached Christchurch New Zealand's submission on the Ōtautahi Urban Forest Plan.	Adele Radburnd
50611	Please find attached, feedback on the Draft Urban Forest Plan on behalf of Orion Group Ltd.	Hannah Marks
50618	Thank you for the opportunity to provide feedback on the Ōtautahi Christchurch Urban Forest Plan. Please find attached, a signed copy of Kāinga Ora's feedback on the same.	Mel Rountree
50701	Please see attachment.	Chris Ford
50704	The coastal community is very low on urban trees and we support a lot of what you propose. We would like to also submit the following comments	Netty Bolton
	The more well off suburbs have a lot of green space already, what's going to happen to the trees that we already lost in South New Brighton reserve? Southshore currently sits at <5% canopy cover. Very low.	
	We would be interested in whether increasing tree density means more predators such as possums and what the plan is for that. Planting non-allergic trees.	
	Trees that don't impinge on insurance criteria - like the ones that have come crashing down on houses. The opportunity to create a food forest in the red zone.	

	Organisation
	Little Kiwis Nature Play
d	ChristchurchNZ
	Orion New Zealand Limited
	Kāinga Ora – Homes and Communities
	Disabled Persons Assembly
	(DPA) NZ Inc
	Southshore Residents association

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name	Organisation
	More trees along cycleways.		
	Watering and care of new trees		
	Not writing off the coast because of perceived SLR but using them to increase resilience.		
	Maintenance of the trees.		
	Opportunities for trees in residential areas - gardens in particular. Not everyone can afford them, and some people are renters so can't plant.		
	Consultation must occur with any affected property owners or communities so that		
	1. Trees do not impede views or sunlight.		
	2. The ongoing maintenance of trees is specified- e.g., have large boundary tree's on CCC land that they will not trim even though they are affecting the		
	sunlight of adjoining properties.		
50705	PDF of our submission attached.	David Hawke	Halswell Residents Association
50707	Te Hapu o Ngati Wheke have undertaken and supported a large number of ngahere restoration projects within Whakaraupō and on the Port Hills more generally which including areas which appear to be defined as Urban under this draft plan.	Andrew Scott	Te Hapu o Ngati Wheke
	We have a policy which supports using local seed source for any native planting programs and would expect that we will be consulted regarding any significant planting within the Whakaraupō harbour basin, Urban and / or Rural areas and elsewhere in our takiwā.		
	We note that there are a number of names used within the document, such as Horomaka, Ōtautahi, Christchurch and Banks Peninsula however with		
	the limited time available to review it was unclear as to the exact areas each of these names relate to. Without clarity as to the specific areas referred to		
	when using these names it is difficult to submit on this draft plan.		
	We would therefore ask that consideration of all non-urban areas inc build areas on Port Hills and around Whakaraupō deferred to be considered along with the rest of Te Pātaka o Rakaihautu rural zone so we can consider all these non-urban areas together.		
	We also suggest the plan needs to be specific as to the specific areas being referenced by each of the names used.		

Individuals

49629 I think an instruction to staff arranging planting to make allowance for future walking, cycling and mountain biking tracks to cross each area of trees planted should be added. This will avoid having to remove healthy trees to add these later. Mark Penrice 49630 There should also be clear breaks in the trees to ensure fire can be controlled and a plan to put out urban forest fires. Beereley MacDonald 49630 There needs to be better protection for existing trees. Old and special trees should be on a register that protects them from destruction. I don't know if such a register exists or, if it does, what legal protection does. It gives trees? Peter Earl 49631 Trees on the side of the road waste space, the leaves clog up the drainage. Land and roading is extremely expensive, let's not waste this land (for every one tree on the side of the road mawkard strips of grass that serve no purpose have to be maintained?). It would be better to wide footpaths and build bike lanes and plant more natives in our parks Peter Earl 49632 I recently had the street tree in the bern menoved due to it being vandalised. I was told it couldn't be replaced die to I termed cables that were laid. This didn't make sense to me because the tree was already three when the cables were put in. I think of a situation like that happens it would be appropriate to replace the tree with a variety that has a smaller root system. Such as a cabbage tree etc. Also, in my street a few streets tree have been removed due to them dying and they arent being replaced. Would be a good idea to replace there with a variety that has a smaller root system. Such as a cabbage tree etc. Also, in mol just mainly within parks. Ensure that whenever a project is done (e
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49640 Usupport the plan and its intent to mitigate climate change and provide a healthier more beautiful environment for our city's people. Of particular importance to me are the Renee Blackburn
increasing of tree canopy in poorer areas, planting more natives and bee-friendly species, and requiring developers to include much more trees cover in their plans than they currently
do, regardless of where in the city they are developing.
49641 Strongly support increasing tree canopy, with a strong emphasis on increasing native biodiversity. While large trees are good, we also need to include the wider benefits to Rosemary Neave
biodiversity of shorter plantings from tussock and flax up. It would be great to have enabling processes around people having other than mown grass on the verges outside their
homes, including care for underground services and safety and visibility for others using the roads.
I am not against cutting down trees if they are not in the wrong place, but many more must be planted in roughly the same area to replace them. We cut down one large kowhai to
build our nouse but planted the entire section out with natives and edible plants - not a blade of grass in sight. 40C42 Late make this a reality.
49042 Let S make this a reality. 49042 Evention to the set of the set
49643 Excellent news: Constitution needs lots more trees, especially New Zealand native trees that will attract our birds and encourage them to move throughout the city and suburbs. Diane Sullivan
49644 Giad this is being addressed. I'm a resident of the central city and trees are essential to making it into a livable environment, especially for those in apartments and units without a Michael Groufsky

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
49645	I am happy to hear that part of the process is to address developers. I am so distressed to see developers completely clear pieces of land, build and they plant the bare minimum to replace beautiful full trees. The condensed building that developers are doing all around our urban suburbs does. It allows for Amy plantings. The teeny-weeny pieces of land that are left are very often planted with tussock or small hedges. I also feel monitoring of commercial areas needs to be more stringent. We need to encourage them to do planting in creative ways. Rooftop gardens, live walls etc.	Linda Harris
	I have really noticed a lack of respect towards gardens and nature strips around our city for quite some time. We r meant to be the garden city, but I find Auckland, Wellington and Hamilton far greener than Christchurch. I recently visited the Hamilton Botanical gardens, and I was completely blown away with its vast spaciousness and the themed areas throughout the botanical gardens and then I felt embarrassed that we in Christchurch boast about being the garden city. WoW Hamilton nails it over Christchurch. We truly need to change that. As a city we need to feel proud about the Garden City Status we have. We need to work very hard to keep it. That means no more building on our very precious Hagley Park and encouraging our developers to work around existing plantings and replant as much as possible. Use incentives to get them on board. And finally, we need to enforce the rules surrounding commercial sites having platings. Developers plop	
	I'm bendy little saplings and think they have reached their obligations, but you can't replace stunning trees with saplings which take over 20 years to make a beautiful visual outlook and canopy in a street.	
49646	I love Christchurch and its planting of exotics. Natives have their place but in inner city they are scruffy and lack form and grandeur. My Avonhead 850 sq m section is surrounded with mature tree I have planted over 25 years. Some I have replaced when they got too big.	Leonie Hill
49647	I have not read the plan but will try to. I read the Stuff.co.nz article and love the sound of council planting more trees. I live in Ricc/Fendalton area (for 65 years) and hate the sound of the chainsaw as, yet another large, lovely tree is taken down for more dense housing. I am great fan of the Protected Tree program. I was assuming I was the only person in the suburb that appreciated large trees as I assumed the council wanted them all removed so more housing = more rates collected.	Gary Chisholm
49648	Can we choose what to plant on the nature strip outside our houses? Tree wise or shrubs?	Sam Hopkins
49649	Fully supportive of a green native canopy for chch but the council or neighbourhood must look after them once planted as well as the reserves and plantings we already have which are often sadly neglected	David Cox
49651	Overall direction of the plan is good and absolutely in support. Would be great to see more emphasis on the planting of food producing exotics alongside the native replanting goals. Progressing the existing resource is important to overall resilience of our community	Karl Laird
49652	Need to push harder. Can we do sooner? 2050? Can we do more? 25?	Andrew Panckhurst
49653	Really appreciate the Urban Forest Plan and think it's really important for our city going forward into the future. I look forward to a lot more trees being planted across the city in the coming years! It's a fantastic legacy to leave for future generations. The plan isn't super specific about the balance between planting native tree species and planting introduced tree species - I personally would like to see a strong focus on native tree species across the city as these arguably provide the best biodiversity benefits in terms of the established positive relationships that native trees provide for our indigenous birds,	JD Brown
	reptiles, and insects. In addition to the planning for Banks Peninsula mentioned in the Urban Forest Plan, I would also like to see more mention of how the Chch 'Red Zone' will be incorporated into the overall Plan - creating a forest park in this area to increase our city's total tree coverage (and habitat available for native species) is something I'm very passionate about. It's also a really great opportunity to bring birds such as tui back into the city.	
49654	Please more green big trees	Julian Apse
49655	I would like an online sponsorship scheme whereby residents can request to pay for the cost of a new street or park tree. In the UK for example people can sponsor tree planting through their council on a website called treesforstreets.org. Residents can request the location and if the site is suitable the council chooses the right kind of tree for the site and plants it in autumn. Businesses can also sponsor trees.	Rachel Woods
49656	It's good to see an urban forest plan, and not before time. My main concern is the lack of ambition: it is so seriously backloaded that it may well amount to little more than good intentions. This is very obvious in Table 1 of Goal 1: the targets by 2030 are slight (actually, pathetic), whereas those for 2070 (so far away as to be impractical) are safely large.	Eric Pawson

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
	There are huge numbers of streets in the city that are bare of trees or have only silly lollipop trees that provide none of the desired ecosystem benefits. This situation deserves to	
	rectify by 2030 as we are already inside the climate crisis. In this context, who can take seriously 2070 as a target?	
49657	Most of trees here are located in parks. That's not enough for a city like ChCh.	Jim Wu
	My proposal is, for the purpose to protect kids and people who have to walk around residential area from high UV and skin cancer, we need trees planted on both sides of streets around each school first. Then we need to target roads with bus stops. It's no need to have trees lined up closely in one street while I'd say it will make huge difference if 20-25% covering can be achieved.	
	Currently certain area is very abnormal. For instance, Carmen Rd from Hornby High School to Hornby Mall, there is no single tree at all.	
49658	With intensification of housing in the inner suburbs over the last 10 year, unfortunately trees have been the casualty. If you allow developers to remove every shred of living matter from a section, in order to build multiple housing units where there was once one house, and where there no requirement to replace the trees lost, the degradation of our tree coverage will continue. It's really up to CCC to set higher standards in terms of balancing need for housing and need for trees. To reverse this in suburbs with substantial trees, consents need to be changed so that a percentage of existing trees must be maintained when properties are redeveloped. This might mean that less units are able to be built on a section.	Prue Manji
49659	I fully support the development and improvement of forest corridors/ urban forests. However, I do want to express the bulk of these trees to be native trees, and the need for improved biodiversity within these corridors. Ōtautahi is a beautiful city, but it does lack lush native forests. Places for recreation, nature connection and education for the betterment of the lives of future generations. Let's increase of native urban forest corridors together to bring back the incredible native species the inner city currently lacks!	Sian Moffitt
49660	Please focus on native species wherever possible! This is a great environmental initiative, where it's critical to keep the interests of native animals and plant species uppermost. Adding more and more examples of introduced species just further colonises the environment so let's not make that mistake (again). Instead, we have a great opportunity to move from garden city to habitat city.	SB
49661	I support this proposal. Indeed, ideally the target number of trees should be higher.	Tim Anthon
	However, to achieve this target some practicality/ common sense/ compromise will be required in species selection to ensure a mix of quick growth, longevity, replacement plan and exotic vs endemic vs local native (apologies I forget the correct term for this) vs National native species plantings.	
49662	I'm strongly supportive of more trees, and especially more mature trees in our city.	John Carter
	My only added suggestion to your plan is to engage with bird biologists to maximise bird habitat in your tree species choices.	
49663	Consider promoting public participation through encouraging residents to plant their berms with hebes and other small shrubs that can be easily replaced in the event of services work.	Theresa Cole-Swami
	Promote planting of natives by having affordable plants available.	
	The street tree planting plan strikes as a bit naive since there will be numerous placement issues around underground services, driveway visibility, and streetlight conflicts. It will require a lot of budgets to achieve this.	
49664	Excellent! Let's get started!	Christine Woodside
49665	Excellent idea. Please, please plant natives.	Michael Godfrey
	I live in New Brighton and successfully grow Totara, Pittosporum tenufolium, Cabage Trees, five finger and others.	
49666	I would like to see provision for more open spaces in new subdivisions (and space for a local dairy to reduce car travel) to allow for tree planting and a requirement for landscaping that will give enough space for mature trees in intensified housing developments. Greater protection of mature trees where intensive housing is being put in.	Michele Dyer
	There have been instances of community group plantings being mown or sprayed by council contractors. I would like to see a central register and mapping tool available to prevent this from occurring as well as advice to these groups about appropriate tree species to plant.	
	Although this is about tree cover, shrubs flaxes and grasses are useful for diversity and will help to bring in birds who will eventually help with natural regeneration. Provision for these supporting plants should be made	

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
49668	I feel it is imperative that you do not plant trees such as silver birch in particular as they impact on people's health.	Glenis Youngman
	Ratepayers need a say in the various areas on what trees should be planted in their neighbourhoods. A rate discount for rate payers who have two or more trees on the section	
49669	1) I strongly support the proposal to require new developments to have 20% trees cover - given that 57% of the city's trees are on private land, private development is key to us preserving and building the urban forest. In addition, I'd like to see developers required to protect existing trees that have value, as too developments flatten the area of existing cover and then plant small, as the discussion section of the plan notes. That destroys trees with cultural, amenity and ecological value.	Donald Matheson
	2) I am a resident of Banks Peninsula. I was disappointed that the peninsula was bracketed out in this plan, although I agree that the area has a different profile and needs. But in some respect, it's the more important to address. The peninsula has the best preserved and regenerating native cover in the rohe, a lot of it on private land. It also has some of the longest European settlement in the city, with many taonga trees remaining. It also has major flood risks in its urban settlements. This plan is the major chance for us to address planning around trees in the towns and settlements on the peninsula and there is a risk that planning here will drift and not be prioritised in funding if commitments aren't made now. I'd like to see the council commit in this plan to a statement that the same overall principles of urban forestry apply to peninsula settlements, that the peninsula should be included in targets and initiatives and that trees with high value occur in high numbers and density on the peninsula. I agree that we need specifics plans and that consultation with rūnanga and other stakeholders must occur before specific plans are put in place. I ask that the statement on consultation be extended to specify residents and community groups. I also ask that the statement acknowledge that some major flooding and erosion risks to homes and infrastructure are on the peninsula (think of the flash floods in Le Bons Bay in 2021) and that planting trees on the tops and in valleys is a major way to address this, both on council-owned, DOC-owned and privately-owned land.	
49670	Fantastic! Love it! Go do it!	Paul Flaherty
49671	Increasing our tree cover is an important goal for the City and I support the goal to make tree distribution more equitable across the city. What seems to be missing is promoting fruit trees. There is mention of mahinga kai, and it is absolutely worth supporting and developing traditional food sources, but to not focus on fruit and nut trees misses one of the greatest benefits trees provide (and food source isnt even shown in the benefits diagram). I appreciate right tree, right location may mean a fruit tree is planted, but the focus should be more overt. We need a goal for the percentage of edible trees across the city, and these should also be equitable in their distribution. Fruit and nut trees often require more maintenance so perhaps that is why this plan has not focused on them, but I don't think that is a good reason to ignore the food security benefits they bring. Often, they are deciduous, but there are also many evergreen varieties such as citrus or feijo or olives. To create a plan for Christchurch's trees, without explicitly targeting fruit and nut trees, misses one of the key benefits of trees! Also, school sites provide a great option with built in community participation. After witnessing the Auckland flooding, anything we can do to increase tree coverage the better. Please include fruit and nut trees in this plan!	Kristina Mead
49672	Fully support this idea. I would like to see more native trees planted too - cherries and oaks look nice in spring and summer but cause problems when they lose their leaves and look bleak in winter. Trees also help cool the environment and soak up rain and clear the air.	Sarah Dunning
49674	Please commit to using only native New Zealand trees. To help support rather than harm our native birdlife. All new roadside trees should be native New Zealand trees, including private housing developments. Please commit to helping bring Tui back into our city with appropriate native tree planting.	Jake Owen
49675	Please keep up the proposed planting schedule and just as important look after the existing Reserves. New planting need maintenance for at least the first three years. Encouragement and support of local community groups for planting and restoration is so important for the success	Kevin Dean
49678	I absolutely support the plan to plant more native trees. For too long our CCC arborists have been planting exotics species.	Craig Burke
49679	Please make sure that	Oliver Mould
	1] Trees that are planted as part of new building are appropriate that they can grow to maturity i.e., they're not just planted for aesthetic purposes when young and then have to be replanted a few years later when they start to impact the building by "lifting". Example: the trees planted outside the Justice & Emergency Precinct.	
	2] All new property developments should allow for two trees per house/apartment. Also see 1] above.	
	3] Grants are made available to property owners who have mature trees but cannot afford to maintain them.	
49680	I am a landscape architect living adjacent Brownlee Reserve. I see the need to manage a progressive replacement of the mature pine trees and other exotic conifers with native species. I am happy to provide such a plan free of charge in the interests of the community. While some trees are better than no trees, the exotic conifers are inappropriate for a number of reasons - risk of fire and damage to adjoining properties, pollen nuisance and extensive shading of the playground during winter. A more appropriate response is required to encourage bird life particularly native birds providing food and better resilience.	Nikki Smetham

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
49681	I'm so pleased to hear of this policy, well done to the CCC team involved. I have two points	S Taylor
	1. I live on a street lined with large oak trees and Treetech are frequently in our street looking after the trees, presumably on contract to the CCC. When I think about all the oak-lined	
	streets around town, I think of all the ratepayer funding that must go towards the upkeep of these trees. While the oaks are lovely trees, when CCC is choosing species to plant in	
	future I'd urge you to choose trees that require minimal human intervention, to keep arborist costs down.	
	2. To encourage residential tree planting in private gardens, I wonder if the CCC could create a resource to help homeowners and developers identify suitable trees, both size-wise	
	(given that section sizes are shrinking) and to encourage more diversity of planting. (Does every new townhouse need a magnolia outside?!) Also, to help identify which species suit	
	the climate here (present and future).	
49682	Very happy to see the council increasing our tree coverage. Let's do it!	Ryan Bond
49683	Please do not plant cabbage trees as the leaves are not compostable and when they are not put in the red bin, they tend to block the drains. My preference would be for more	Linda Nicolson
	fruit/nut trees.	
49684	I am fully supportive of this initiative. It has so many benefits to ratepayers and beyond.	Sylvia Maclaren
49686	I believe it is a very good comprehensive plan, except that there was very little information on your plans for the red zone where the Avon meets the estuary. Possibly that area comes	Dr Bonnie Miller Perry
	under a separate plan.	
	Hopefully you can implement the main plan in a quicker timeframe than you state.	
49687	This is GREAT!!! THABK YOU CCC! I think trees on private property, anything within 3mtrs of the fence line need permit and neighbours' consent to remove. This will stop developers	Jane Nuttridge
	clearing entire sections and their neighbours totally exposed to the new buildings. Something like this anyways! I know aty place all of my ambience, shade and trees comes from my	
	the herderline is down Deminion Avel	
40690	Ine bordenine is down Dominion Ave:	Puth Willing
49009	mitigate climate change impacts support biodiversity and babitat protection etc). Ka rawel	
49690	Congratulations on a wonderful detailed and visionary plan	Wendy Biggs
+3030		Wendy Diggs
	Mt Pleasant: the valleys extending up from the Drayton Reserve, John Britten Reserve, red zoned land and scrub land adjacent to the Drayton Reserve would be ideal for native forest	
	planting.	
49692	I am in support of the proposal to increase urban tree cover and think that this is a fantastic initiative of the council. I also think that it is good that there is an emphasis on tree	Angela Brown
	maintenance as I think currently there is just an emphasis on getting trees planted (particularly in many larger re-vegetation planting projects) with little or no maintenance carried	
	out which results in poor plant success rates and is a waste of money. I also think better weed eradication needs to be undertaken to start with to prevent ongoing issues with weeds	
	outcompeting the tree planting (or smothering them in the case of scrambling and climbing weed species). I would like to see higher percentages aimed for in commercial areas.	
49693	Understand you say it is difficult to force developers to retain canopy trees e.g., Kainga Ora development on Domain Tce. Also understand we need housing hence the dilemma. Would	Chris Ponga
	it be possible that the council could require the developers to have to replace those canopy trees with mature canopy trees elsewhere e.g., on the curb like in Rose St? I say mature	
	trees rather than baby trees as you also say we need to grow our city canopy as fast as possible.	
49694	No specific comments, but I am very pleased to see plans to develop and nurture and protect our urban canopy. It's going to become more and more important to help buffer us from	Genesis Buckley
	the weather extremes coming our way. Plus, trees are beautiful and good for our brains and our souls.	
49695	I he plan looks basically sound. I would like to see higher coverage goals in Table 1, if at all practical. I gather that a problem with the common tactic of planting only male trees in an	Daniel Neville
40000	effort to reduce seed litter in urban environments is the exacerbation of Seasonal Non-consensual Bukkake for allergy suffers.	Charles hadd
49696	i support any and all efforts to increase tree cover in the city, for all the reasons stated in the plan.	Stephen Juda
	I would like to see pative species from this region as the first choice for trees. As a second choice I would like consideration of adibility (fruit and put trees) one of my fondest	
	memories of Jerusalem is the careb and plive trees as street trees, which local people made use of	
	Finally, I first opened this page before dinner. Then I cooked dinner. Then I came back and typed a different version of this submission, only to see an error message "your session bas	
	expired" and no way to get my comment back. Firstly, there is no technical reason to have a session limit shorter than say one day. Secondly, there is no technical reason not to	
	restore the submitted comment. Please consider fixing this aspect of your content management system. It is not only irritating but likely eliminates a certain proportion of	
	submissions composed over a longer period.	
40.000		
19200	This is excellent but insufficient news. I fully support increasing the nercentage of trees currently in Christchurch, but the nercentages are too low. Once summer temperatures reach	Ioan Melyyn

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	doubling as a minimum, all the percentages given.
	I would also encourage the council to look at the possibility of implementing a cooperation agreement between it and the commercial sector, with a reduction in rates for the businesses which forgo covering all of their area with concrete/asphalt and by contrast planting trees and shrubs. The amount of land covered over with hard surfaces cau variety of problems and businesses need encouragement to reduce this and the resulting number of car parks. There is a need for both carrot and stick so that those that we participate should experience a rate increase to comopensate the support of those who do. A recognition award system for responsible businesses could also be instituted they could then use as part of their advertising strategy. Thank you.
49700	What types of trees are you planting? Are they compatible with each other? There is a need for urban fruit trees for urban consumption of produce. The Avonside area grow fruit trees. Thanks
49701	I support the project, but I wish it were more ambitious and given higher priority. Given the flooding events in Auckland and the heat we are currently experiencing, our urb should be developed and protected with great urgency. I would like to see more planting occurring on behalf of the council on all council owned properties (parks etc). It we great to see more requirements for developers to include green space or trees in their projects. I would also like to see better use of available land, putting up blocks of tow makes no sense in the central city. Apartment buildings should be preferred if we are trying to maximise the availability of land for green spaces and trees. It would also be us using the 'sponge city' concept in our urban areas, particularly out west and in the dead urban spaces around the central city.
49702	Great plan. More greenery is much needed. Could you please plant some trees on the grass verges on Nanette Street? It would make the street look lovely, just like its neigh Colligan Street. Janet Street could use some trees in the grass verges as well - it is the entrance street to get to Colligan and Nanette.
49703	This is a great initiative for our community and region, and I would support commencement asap! While I'm sure that your team have targeted a number of areas to comme plantings, I have noted that the Lancaster Park redevelopment, since it has opened has attracted large numbers of families and sports to use the fields. Also, as a local i hav few bird communities come and stay as well. I believe planting here would increase the value for the local community, especially if a few more amenities were included eg, fountains and fixed tables under treed areas. I'm not sure whether there is local water that could be diverted but could likely help with land maintenance as well. Finally, as starter, Christchurch has a large community of retirees, perhaps there is an opportunity to reach out and seek their involvement as a group who would have a bit of spare to who would likely be quite motivated and available to spend time in this program!
49705	First and foremost, I support this plan totally. I have long been concerned by the removal of vegetation in the Christchurch urban area and a failure to adequately replace. We escalating environmental concerns both brought about by human activity, but also our reputation as being a "Garden City", which assumes an ecologically responsible urb exists, this is very timely. Please see attachment for full submission.
49706	I think planting lots of diverse trees is fabulous, especially in areas that have very few. Can you plant more around flood prone areas or in parks that aren't used much. For i our nearby park has picnic tables with a few trees and ice never seen anyone sitting there. My impression is that's because it's too bare and needs more planting for visual i a walkway in Richmond Park. How about fencing off more of the red zone for rewilding, letting people plant self-seeded natives in some areas, I'm always removing kōwhai from my garden and would love to transplant them.
49707	Broomfield Common in Hornby is very underutilised in the heart of Hornby. An excellent place to bring nature back to the city. Next to the new seimming vomplex it would compliment and families would enjoy both. Great for the environment too.
49708	I am hugely supportive of this plan as it would be beneficial for everyone in Otautahi for mental and physical wellbeing as well as some benefits for climate change.
	It would be interesting to see how many of these trees will be native to encourage native birds such as the tui which are missing for Canterbury.
	I would also be supportive of the planting of perennial plants and wild flower meadows on berms and roundabouts across the city, rather than regularly replanting flowers cost that only last for a very short amount of time. Letting wildflowers colonise and not continuous mowing grass will also have a greater positive influence on pollinators a wildlife as well as encourage a shift away from over manicured areas.
49709	I am very supportive of this plan, which is likely to improve environmental health, mental health and increase Chch's resilience to some climate change impacts. I wonder hof these trees are likely to be native, though? The lack of Chch bird life (where are the tui?!?) compared to every other centre in NZ is quite tragic, and I wonder whether the native trees is a primary reason?
	As well as increased tree numbers, it would be great to see CCC install urban meadows, particularly in areas where tree plantings may be unsuitable (e.g., on berms, round)

	Name
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slovely	Holly Ramsay
an canopy ould be nhouses good to see	Liam Krigsman
bour	Ian Farrell
ence e seen a water a thought me, and	Steve Yianakis
Vith an area	Robert Glennie
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	parks). This approach would also likely provide much more value for money than planting (and replanting) non-native flowering plants (e.g., as currently happens on the be Park Tce.)
49711	I am fully in favour of increasing tree canopy cover by implementation of the Urban Forest Plan. Our city clearly lacks sufficient trees over wide areas.
	The benefits of increased tree cover are multiple as described in the plan. However, the claim that an increased urban forest could sequester sufficient amounts of carbon significant mitigation effect on climate heating should be de-emphasised. If it is highlighted, then this would provide an excuse for slowing down actions to reduce emission supposed "offsets" could be claimed. It is emissions reductions that are critical in the next few years to 2030. New tree growth sequesters very little carbon. Also, the total the number of trees up to 2070 is small, from about 14% cover now to >20% by 2070. Therefore, even the increased number of mature trees by 2070 will not have sequester carbon in comparison with our current emissions. Another consideration is that there is no guarantee of the long-term health of plantings in the city as this is already a streenvironment and will become more so as heating continues. Trees cannot be guaranteed as permanent stores of the carbon they sequester during growth.
	For significant sequestration of carbon, the city needs to focus on the regrowth of native forest over wide areas of Banks Peninsula. Even if this occurred, it should not be c "offset" emissions as it would simply be replacing forest that was present a century and a half ago. Emissions of CO2 from the loss of those original forests are still in the at and will have contributed to global heating. By re-establishment of those forests, we would be re-absorbing historical emissions and therefore should not claim "offsets" for continuing emissions from fossil-fuel use.
40712	All new plantings should emphasise indigenous species. The "biodiversity crisis" is well-known. Especially on the Canterbury Plains there has been devastation of indigenous since European arrival. Of the 10 species for which you provide data, 6 are introduced and 4 indigenous. Indigenous species make up only about 36% of the total number of trees. If there really is a desire to retain and enhance indigenous flora, then the city environment is the best place to set an example because this is where most people see during their normal lives. Well-planned, diverse and attractive plantings would help increase support for regrowth of indigenous vegetation in the wider landscape outside
49712	Still very concerned with the up to 1,000 mature trees to be chopped down in the old Ascot Golf course area and around QEII Park area as part of the Grand Plan. We have r hot it is now that stands of mature trees have been cut from beside the walking track in QEII as the welcoming shade areas diminish. All very well saying around 7,000 nativ will be planted there but they seem to be flax, grasses, cabbage trees offering no respite from the fierce sun. Walkers really appreciate shaded areas - as do the disc golf pla Exotics and natives can live together in the same area. You don't have to cut down all the large shade trees
49714	We have a 100+ year old protected tree on our family property which has been described as "exceptional". After 3 generations we sadly must sell this magnificent tree fille We are so very worried that this tree and others will be cut down (despite protected status). Due to the beauty of this one particular tree, we would like to see much more su from council to ensure nobody can ever destroy this red beech for the sake of subdividing the property. We need much stronger laws so potential buyers/ developers don't brazenly cut protected trees down and pay a 20k fine. With a tree such as ours it needs to be a \$200,000+ fine, as it's only greed that will make them cut it down in the first p bigger deterrents are needed for these exceptional trees. Part of our city's history.
49716	I wholeheartedly agree with the plan. Increasing tree cover in areas of economic deprivation will give a lift to those communities.
	In line with planting more trees, Matson's Ave in Papanui has a few trees but also empty "boxes" on the road where trees used to be. I'd like to see trees re-instated here. He they will need to be protected with a robust physical barrier, as we have seen saplings broken in the past there.
	I am exceedingly fortunate to live in St James Ave with its beautiful scarlet oaks. Keep up the good work!
49718	Kia ora. Thank you for this project. As a family we totally support an increase in our urban forest - we love trees, benefiting greatly from those that have always been here, a that were planted before we came. We love the 100yr+ pear tree that provides us relief from the heat of the summer. We also benefit, though we didn't think this would be to living next to what was the Red Zone - now the Green Zone. The pleasure of riding and walking this area was not what we expected 12 years ago when our lives were devast force of Mother Nature! We agree with the points you raise - the plan needs to take into account climate change, so to utilise trees and growing a forest that accommodates assists in managing climate change; that there is equitable cover for all; and that how we go about our housing developments needs to adjust to cater for trees to be part or infrastructure of our city. So, looking forward to seeing this growth, to know our next generation and those to come will profit and enjoy it, that they too will have a beautiful Ngā mihi. Mauri ora tātou.
49719	I fully support the plan – great work!
49720	1) How will property managers be engaged to take care or plant of trees within their property? How does this work for a tenanted property? Who is responsible for these tree will the council engage with them?
	2) Are there incentives to planting native as opposed to exotic trees, especially given that there are carbon credit incentives to plant exotic trees in rural areas?

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	Paul Broady
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ous flora f individual vegetation the city.	
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nd those he case, ed by the but also f the Il Otautahi.	Sarita MacGregor
	David Grogan
es and how	Molly Magid

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49721	Hi, I have lived in Halswell for nearly 30yrs and in that time all we seem to get are more houses. As one of the largest suburbs in Christchurch it would be lovely to have more trees as	Rosie Baguley
	nature is nurturing for all our whanau. We often visit somerfield and cashmere for some tree therapy. I know these haven't got as much new development as Halswell but surely, we	
	can improve Halswell's tree count.	
49723	The plan makes good sense overall. However, key ideas need to emphasise:	Robert Manthei
	1 Logislate for adequate space for tree planning and growth. This should be mandatory for all commercial and residential developments	
	2 Planting and nurturing of trees (preferably indigenous varieties) should be done relatively equally over the entire city leaving no 'hot' (or barren) spots	
	3. The more trees provided, the greater the run-off area for excess rain and stormwater. Climate change will make this a much more important consideration over the next decade or	
	so.	
	4. Planning should be encouraged on private as well as public land with relatively few rules restricting this activity.	
	5. A tree shaded city will be more attractive and provide a healthier environment for its citizens and visitors.	
	6. These comments apply to the inner city/downtown area as much as they do to suburban areas.	
49724	I would like to preface this commentary to say that I think trees are fantastic and that our built environment is nothing without them. I completely understand the benefits we get	Jamie Irvine
	from them. The explanations in the attached document are undeniable and I enjoy being in my own yard being around a number of semis established planted trees, which have been	
	established by myself and previous owners.	
	See full submission in the attachment	
49725	More trees literally everywhere, native & exotic. There are virtually no trees in the 6 blocks around our house (Shirley Rd, Marshlands Rd, Hammersley Ave, Ouinns Rd) and it's	Katie Neill
10120	noticeably hotter in summer than a little further down on Emmett St where there are large trees planted along the berms.	
	Just not silver birch trees as they are awful.	
	From the NZ Allergy website, www.allergy.org.nz "Allergy to the pollen from Silver Birch trees is the most common trigger of OAS, with around 25% affected."	
49726	It's important to preserve trees that are indigenous to the whenua. They provide hop on/off points for native birds. With each section that is repurposed to housing intensification	kylee olds
	there is a disregard for the mature, indigenous trees that are within that section.	
	An example of this is Spreydon. The section next to mine had mature kowhai, horoeka, te kouka. There was tui that would sing out in the rain. The developers came and	
	pulled the trees down. If we look at the Urban Forest plan a simple solution to being proactive instead of reactive is to pop in a clause in the consent process to ask all developers	
	(offshore clients don't care about tui!) to show how they can retain the toanga of the mature indigenous trees that are on that property. Instead of being reactive by planting trees	
	which is greatkeep what we have had. It is as easy as writing this into the intensification planning. Keeping trees could also provide opportunity for iwi and council to work alongside	
	each other to identify mature indigenous trees on private land that is earmarked for development.	
49728	Please do not cut down the beautiful big trees in Dudley Street - the east really needs those big trees! They are spectacular, important for wellbeing in the community, and create a	
	green corridor for birds.	
	needed grass-roots connections with communities around the motu by creating a project to involve tamariki from eveny school around the city to belp populate / grow areas of forest	
	- native or otherwise Imagine the forest in 30 years' time that they can take their children biking and walking in As well as benefiting the wellbeing of the children involved and	
	encouraging their awareness of civic duty and connection, this would have a joint outcome of creating habitat for native bird species (as Zealandia in Wellington does so successfully).	
	as well as providing much-needed forest walks so close to the city - this, as is well known, is beneficial to the emotional health of all humans.	
49734	Right tree, right place should be focused on native plantings indigenous to the specific area.	Martin Wheldon
49735	Great initiative. Fully support maintaining existing tree cover and increase this in future across the city. Ambitious goals but great to see and be a part of.	Nick R
	One thing that was missing in the plan is seeing trees also as a food source. More emphasis could be put on that. I support planting more evergreen native species (as most of our	
	streets are lined with deciduous trees that lose their leaves, clog stormwater infrastructure and smother river ecosystems. However, having some deciduous trees and especially fruit	
	trees in the mix in appropriate locations (away from waterways and stormwater infrastructure) will help with improving soil health from falling leaves as they compost on the ground	
40720	and form organic matter, and provide food sources to numans, birds and insects.	Rachal Wastaway
49130	many many manks for the opportunity to provide recorders on this kaupapa. Family agreement with the aspirations as they are faid out but have two general comments. The first is around disconnect between this work and the changes that were made a number of years ago to allow increased density of housing in certain locations (usually around malle). While you are	Rachel Weslaway
	alsconnect between this work and the changes that were made a number of years ago to allow increased density of housing in certain locations (usually around mails). While you are	

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	planning to assess the reasons why some areas have less trees, it does not take a	
	study to suggest that there will be a correlation between density of housing and low tree canopy. Trees and three-story housing that takes up almost the full footprint of a property do not go together. In addition, properties adjacent to these new builds may need to reduce their existing canopy to counter the increased shading (loss of light) introduced by these new builds. Medium density housing in areas such as Barrington is putting unsustainable pressure on our water infrastructure and increasing the risk of flooding while reducing opportunities to plant trees. This needs to be addressed as part of this mahi.	
	My second suggestion is to strengthen proposals to work with community. I believe Individual land/homeowners (with the right support) will value the opportunity to plant their properties in a more effective way. People are desperate to find personal and proactive ways of contributing towards the fight against climate change. Providing support for residents to plant, not only trees but other species such as flax, and other natives that support wildlife, gives residents a sense of agency and contributing to a greater purpose. Supporting residence with education, seedlings, subsidised water drums would tap into a significant resource and contribute to the goals laid out in this plan.	
49737	Christchurch is, sadly, heading in the wrong direction in terms of tree canopy and, specifically, retention of mature trees thanks to intensification. The Garden City is dying.	Kathleen Crisley
	Planting of new trees will take decades to reach the cover of mature trees that are being destroyed in the name of housing intensification.	
	Therefore, I think this plan needs to be strengthened by educating the public about tree loss and retention. As part of every new development, pre- and post- development photos should be published by the Council to show if mature trees were retained as part of the development. The pre-development photos could come from Google, the Council's own archives, etc and by the applicant themselves. Tell every Building Consent applicant that this will happen as part of their consent (to provide pre-and post-development photos, with a clear statement about whether the site was clear-felled before building occurred).	
	Make regular reports to the public and Community Board about developments that did and did not retain trees.	
	And ensure that the forthcoming Plan for Urban Intensification specifically says that it "has regard to" The Urban Forest Plan so the plans are linked.	
49738	Don't get me wrong I love trees but they take a lot of looking after and who is going to do this?	Michelle Foster
	I have two flowering cherry trees outside my place in Aidanfield and they are owned by the council. Over the last seven years of living here no one has cut them back, taken out dead branches etc We have done this ourselves and then paid for it to go to the refuse. In an alley way going out of our Cresent there were two trees growing then over a year ago they disappeared. They were not replaced but now the council mowing service can mow the lawn a lot easier and faster without those trees. My guess it was the council who removed them! My boys play a lot of sport, and all of our parks are very open with no shelter. Nga Puna Wai is another example of this, a very open windy and sunny place. These places definitely need some shelter.	
	Who is going to pick up leaves and branches from these trees that cause flooding when it rains because no one has been around to pick up or sweep the streets? This is extremely bad around Halswell in the Winter time. Our trouble in Halswell is subdivisions popping up everywhere and guess what is being taken down to make way for these houses? TREES!	
	Prime example of this is around by the Halswell Quarry, Halswell Road etc. I was also reading an article the other day that had a street lined with trees and these were going to be removed as they were too big and were causing damage to footpaths etc. Great planning a few years ago but again no one looking after these trees before they got out of control. Such a shame and a waste of all those years growing them. You say they could be replaced but is it not going to be the same problem in years to come unless they are looked after and some thought going into this process?	
10741	There are a lot of questions and sorting out to do before this big plan goes into action unfortunately.	Clara Simpson
49741	suburbs with less tree coverage than that of the most covered to the same or very close level. e.g., aim to raise Hornby to the same / similar amount of coverage of, say, Fendalton, and so on. Our biota and biodiversity need to increase enormously in order to have a healthy and resilient city for all.	Clare Simpson

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49747	I would like native trees to be explicitly made the priority in almost all new plantings of trees. I believe exotic trees are not desirable and should not be planted.	
	- Exotic trees create an ecological dead zone of native life.	
	- Every additional native tree makes the effort of attracting native birds more plausible.	
	- Deciduous bare branches look ugly in autumn and winter.	
	- Decidious lear litter in automin requires cleaning to prevent clogging drains.	
	Zealand not Christchurch England	
	- Exotic trees are the result of attempting to turn New Zealand into a slice of Europe, the same thought process that introduced every exotic pet, and criminalised Maori cul-	
	don't need to consider any part of that legacy precious, or something to be maintained into the future.	
49753	Can I ask that you consider tree planting along grass berms in the older Christchurch suburbs. I realise that it would only be possible on berms that abut the street - not fen	
	An example - I regularly bike around Wigram and enjoy all the kowhai and totara lining the streets. Turn into Awatea Gardens and completely empty. What a contrast. There underground wiring so no overhead obstacles and with suitable trees, the area would look so much better. L'm sure there are other areas that could be planted the same w	
19757	It is the best thing we can do. Without trees the city will become an ugly industrial mass. We need more trees!!!	
10750	What a fantactic forward-thinking plan. I fully support this and can't wait to start III	
49750	A same start and start and start and the increase of tree canony cover in Christehurch. As a resident of the city, Estrengly believe	
49139	initiative has the potential to bring numerous benefits to our community, both environmentally and socially	
	initiative has the potential to bring numerous benefits to our community, both environmentally and socially.	
	Firstly, an urban forest would help to mitigate the effects of climate change. Trees absorb carbon dioxide, a major contributor to global warming, and release oxygen, there	
	improving air quality. The additional tree cover would also provide shade and reduce the heat island effect, making our city more comfortable and livable.	
	Secondly, an increase in tree canopy cover would enhance the biodiversity of Christchurch by providing habitat for a wide range of plant and animal species. This, in turn, w	
	to maintain a healthy and balanced ecosystem within the city.	
	In addition to these environmental benefits, an urban forest would also have a positive impact on the health and well-being of our citizens. Studies have shown that expositive impact on the health and well-being of our citizens. Studies have shown that expositive impact on the health and well-being of our citizens.	
	spaces can reduce stress, improve mental nearth, and boost physical activity levels. This is especially important in an urban environment where people often tack access to and are exposed to high levels of pollution. I believe that Goal 2 people of particular focus. There has been an obvious lack of care for some trees, this includes new trees to be of particular focus.	
	central city where a number seem to suffer from the stress of dry summers and die. There is little point in planting new trees if those that are young growing trees are not w	
	maintained	
	Finally, an urban forest would also provide a unique recreational opportunity for the people of Christchurch. People could enjoy the peace and tranquility of the forest while	
	jogging, or simply relaxing. This could also provide an opportunity for environmental education, with trails and information boards explaining the benefits of an urban fore	
	species of plants and animals that it supports.	
	In conclusion, the development of an urban forest and the increase of tree canopy cover in Christchurch would bring numerous benefits to our community. I urge you to co	
	initiative as a priority and allocate the necessary resources to make it a reality.	
49761	As a St Albans resident I have witnessed the loss of multiple trees on private land in our suburb over the past 10 years. Private gardens which held numerous mature trees l	
	cleared by developers for in-fill housing and multi-unit development. The planning requirement for a portion of the new developments to be 'green space' is inadequate, v	
	pocket lawns being the go-to in many developments to meet this requirement. Where trees are planted, they are often inappropriate species such as magnolia grandiflora	
	become far too large for the site within a decade, and likely be felled by subsequent owners as a result. I would like to see the council strengthen planning requirements to	
10765	Levelopers recarming existing trees wherever possible, and to require replanting of appropriate species when sites are cleared.	
45105	relationship with this company)	
49769	I support the aims of the plan in general.	
.5105		
	However I do not support any proposals for protection of trees on private land.	

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	Michael Davies

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
49775	An important asset the city holds is CCC road reserves, and it has become a practice to allow properties to encroach on these reserves, then make the encroachment legal by	Tim Lindley
	requesting Road Stopping and sale of the land to the adjacent landowner. These parcels of land must be seen by CCC as an important asset for Urban Forest development, and	
	whenever road stopping is considered, the value of that land for future tree canopy development forms part of the decision process, whether the parcel is part of a continuous strip	
	across several frontages or is on its own. Road reserve land must be seen as an asset in the Urban Forest plan	
49778	The new subdivisions all around us (we're in Longhurst) cut down trees but don't plant many to replace them. It is really impacting us as the trees used to act as wind shelter belts and	Rebecca Jacka
	it gets Really windy here.	
49780	I understand Halswell is the fastest growing suburb in Christchurch. We also hold the title with the lowest tree canopy. There needs to be a lot more accountability on the developer	Kim Scott
	when these new subdivisions are being built to plant more trees. In my opinion they need to be natives, so they encourage a variety of birdlife back into Christchurch. We are known as	
	the Garden City yet there is a lack of tree canopy over the whole city. Many of our reserves and parks are being overtaken by weeds. Westlake Reserve is a prime example of weeds	
40701	Strangling out halive plantings around the lake edge.	
49791	i support this plan fully and love the idea of supporting people to plant, nature and protect trees on private land also.	Arwen Sommer
	There would be countless benefits to the city including health conservation and tourism. I believe this is a well thought out plan and can't wait to see it in action. As a resident of	
	Spreydon, it would be incredible to have more tree cover. Looking at the graphics supplied Loan see how my street has been suffering from the heat island effect and has needed	
	regular asphalt repairs. Lunderstand the submissions are usually for issues with plans. However, Lam so pleased with this plan that I want to make sure the community boards, city	
	council, and planners know there is enthusiastic public support behind it.	
49793	I think this is a good direction for Ōtautahi.	Ben Dickie
	Increasing our tree cover across our city is essential to supporting diversity and ecology. When looking at the city from above you can see the potential - a tree canopy that interrupts	
	the roofs of our suburbs and buildings, making our city look like a living place.	
49794	I support efforts by the council to improve and expand Christchurch's tree canopy cover and believe this plan will have a range of positive impacts for the city and its residents.	Sam MacIntyre
49796	thank you for writing this plan	Jane Cartwright
	i believe the communities of CHC really want big trees to provide shade and to increase the aesthetic aspect of CCC	
	maintenance of current trees is critical and let's stop developers cutting them down and replacing them with sticks.	
	the diagram on page 15 needs to be widely circulated and i believe translated into other languages to help people understand why big trees are so important.	
	I favor a mixture of evergreen and deciduous trees native and exotic; in some cases one might need to plant fast growing trees; of course once planted they need to be actively watered and weed around until they are established.	
49797	There are far too many good opportunities being missed out on - let's just get on and do this. We have extensive areas being replanted with wetland species in flood retention basins	Peter Heenan
43131	Where are the associated forest species? - kabikatea, matai and totara etc common in pre-human Chch and could be planted on slopes adjacent to and on higher ground than the	
	retention ponds with wetland species. Many more native trees could be planted in these areas. Also, what a wasted opportunity along new Southern Motorway. Native tree species	
	should be dominant in the plantings along here not the wharariki mountain flax, toitoi and small shrubby native species mostly used. It's not too late to overplant among these	
	plantings with tree species.	
	Landscape architects and planners need to be held responsible for the lack of sensible tree and forest plantings and the many missed opportunities to plant native trees. In Nga	
	Punawai akeake (Dodonea viscosa) planted next to a water retention pond. Surprise, surprise pond filled up with water and akeake died as they dont like wet feet. Employ some	
	skilled landscape architects and get the planning right.	
49800	Most of our local trees at the lower end of Bower ave were removed after the earthquakes, we were advised that there would be replacements - but it has not happened - living on an	Julie hand
	avenue was a pleasure before, now it looks like a wasteland - unattractive - no birds, really sad, please can we have some trees on Bower Avenue	
49805	I have three points for consideration.	Stephen Ridder
	1. Intensive small stands.	
	I did not notice plans to plant intensive small stands. Such stands support bird life whereas an individual tree does not.	
	2 Small Park planting	
	2. Small Fair planning Lwould like to see small parks which get very little use planted completely. See for example the 20-minute neighborhood project from Melbourne. Their research found that small	
	r would like to see small parks which get very little use planted completely. See for example the zo-minute neighborhood project norm melbourne. Their research found that small	

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	parks of a few hundred square meters tend to not be used but they could be valuable spaces for intensive 100% tree coverage.
	3. Deciduous trees have a place.
	Deciduous trees block the sun during summer but allow the sunshine through in winter. These trees would be best planted en masse in the berms along many roads and st
49808	Firstly, the goals are not ambitious enough. 15% tree coverage across all wards feels lacking. A minimum of 20%, with parks/waterways bolstering this up to be overall 25-3 give a significantly more desirable result to communities and Christchurch as a whole, by actually addressing the issues associated with poor tree coverage better. We can and should do better. Many major international cities are doing better than 15% (ie. Singapore, Vancouver, Sydney, New York all have tree canopy coverage in excess 20% v ambitious plans to grow them significantly more. If they can do better, so can we)
	We should aim to be plant 20,000 trees per year, this would mean over the next 50 years we would plant 1 Million trees.
	A much more campaignable idea that the city can buy into. 1 million tress over the next 50 years would transform the city of Christchurch, truely making it a green garden c trees per year is not ambitious enough. 10,000 trees should be the minimum target. 500,000 tresses in 50 years seems a little flat, but it is still significantly better than 8,000
	Street trees need to be prioritised and increased in all areas. A target of 15% for these is not going to provide the cut through or urban environment we seek. We should be a 20% minimum. Christchurch aims to be a biking / walking city then creating streets which are nice to be amongst is integral to making people use them. Many new roads had built, including expensive bike lanes, with not a single tree planted. A sad missed opportunity. Moving forward no street/road small or significant should not include trees. at which these trees are planted should also be increased.
	Clear felling of land for development needs to be stopped immediately. Allowing this land to be cleared with no consequence is archaic given the existing global warming e Vancouver city has protection by laws on all trees with diameter width greater than 20cm and measures above ground 1.4m, and these trees can only be cut down with spe permits. Christchurch must implement similar rules, and if protected trees are cut down then the developers must pay significant fines (which can be reused to plant street This matter needs to be addressed urgently. It is heartbreaking to see the number of empty clear-felled sections around the city.
	A unitary plan with no legal canopy requirements for urban development seems nonsensical given global warming, but also for the detrimental impact on communities. A 2 minimum canopy coverage should be mandatory on all properties and needs to be implemented with urgency.
	Areas where trees can be planted outside of parks etc. to help increase canopy coverage:
	- Railway cycle lane - there is heaps of clear land/long grass strips with no trees which should be planted out
	- Along new major motorway - there are clear spaces which could include less tussock and more significant trees, or spaces where there are no plantings. Auckland has Kau lining the motorway in from the airport, as do many of the new raods around Hamilton and Cambridge.
	- Can non developed land/ derelict houses in suburbs be brought by the council and turned into green plots within communities? There needs to be more green space in re areas. We need to be doing something with all the large empty clear-felled plots of land around the city
	- Greening tops of buildings (planting on top of buildings) to increase green foot print
	Community engagement is huge, all residents need to be encouraged to be part of the movement to Make Christchurch Green Again! This can be from watering and caring street tree, encouragement for planting trees in their garden, regular reminders of local tree planting events. A never-ending conversation with residents needs to be had a they can do to Make Christchurch Green Again. This is a conversation that needs to be fore font in people's minds and enduring year after year after year.
49810	I attended the 6pm session yesterday evening and am really excited about the Urban Forest Plan. It's great to see the council developing this long-term strategy with regard and recognizing the valuable benefits that tress bring to us all. I'm interested in how the team are valuing mature but potentially troublesome trees in the plan. I have been user of Hansen Park and have seen both the huge efforts in that area to develop new plantings - fantastic to watch - but also the problems that the willows, sycamores and create. Is there a plant to "phase out" those species as preferable trees mature?

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l to trees, a frequent poplars	Gavin Davidson

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
49817	I strongly believe that the CCC has a duty to maximise tree cover and intra-urban biodiversity. There are many reasons for this, including amenity, enjoyment, multiple biodiversity benefits and climate resilience. This is exactly what a city council should be spending time and money on as history shows that development is a force in the opposite direction. CHCH as a "garden city" is a joke these days. Trees are going everywhere. Developers and even councils are planting the wrong trees and not maintaining them.	Wilfred Walsh
	I would like to see the list of significant trees to be massively extended. All large trees should be protected and used as nursery cover where new plantings are planned. Developers should be required to plant 10 trees in the city and 100 trees in parklands for every one they remove, and this must be policed and enforced. A 350-home subdivision near me is not doing plantings as required by its consent. A large CCC project near me is not following its own planting plans and is not doing them with ecological integrity in mind. Therefore, the tree canopy planning and regulation arm of the CCC needs more resources and authority to manage this critical part of the city infrastructure.	
	Climate resilience is one of many but perhaps the most compelling reason for massively increased plantings within CHCH - not just trees but successional ecosystems. Not only will biodiversity benefit in ways that people enjoy (e.g., birdlife, attractive streetscapes), but the resilience to flooding, the increasing heat island effect and carbon loading of the atmosphere will all be addressed. As a garden city, a national park city, as a city relatively wealthy by international standards we in CHCH have a duty to show the world what should and can be done in the context of our several environmental crises.	
49819	I would like to put forward the following questions / suggestions	Richard Rowe
	Wellington has had a very successful program of giving rate payer vouchers to buy trees for the street berm at their house. I suggest that such a program in Christchurch should provide vouchers for purchase at Trees for Canterbury and other such places where the money supports social support and trees given away to increase urban forest. For around 14 years I have been growing my own native trees and grasses from seed in mass and planting these along the cycleway and drain between Linwood park and the other side of hardwood street.	
	This requires a lot of water and while I collect rainwater and even use tips from a recent news article about things like collecting shower start water in a bucket a still need a lot of water to do this. I'm also involved in the gardens of rawhiti domain in New Bridgton growing natives for that project. I request that people such as myself can have a process were are provided a water charges exception. I am expecting big conflict at home with our next reading.	
	My address is and I can easily provide verification of plants I'm growing.	
	Additional I have hose irrigation set up from the council flats in Aaron crescent area and a gentleman who has helped set this up and turned this on every night for me.	
	However this creates conflicts with the other residents as they're their water supply not on a loop feed meaning the person at the end of supply line it is single line has major water pressure issues.	
49831	I fully support protecting and increasing our tree canopy. This is a critical initiative. I would like the plan to include clarity on berm planting. It should also include scope to restrict covenants that place limits on tree heights and species.	Rochelle Hardy
49834	I support the plan, and would especially like to see intensive planting in all areas across the city, but especially in two areas in particular: - Hornby - Banks Peninsula	Rachael Hemmer
	I live near Branston Park, and I see this is one of the parks that has been surveyed for tree numbers (I'm surprised that current numbers are noted at 122 trees - I think it's much less than that! Unless it includes small bushes, which wouldn't exactly be accurate). I would love to see this park, and other Hornby parks, planted with natives. It would be good to keep the existing exotic trees too, especially in Branston Park, as these are home to quite a large number of monarch butterflies. I would be happy to help out with planting and looking after the trees once planted.	
	I would also like to see trees lining certain streets in Hornby as well, even if this means narrowing some roads, especially if they are wide already (e.g., Brynley Street, Neill Street, Branston Street on the industrial side). Kowhai would be great for this.	
	I would love to see funding given to support the 'Tui Corridor' on the Port Hills and Banks Peninsula. Pest trapping should also go hand-in-hand with tree planting, to encourage re- establishment of native birds in the city.	

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	Please be firmer with property developers and make them keep existing trees when developing land. Replanting or paying fees doesn't get the same result, and they shouldn't be able	
	to buy their way out of their social and community obligations. Road developments should also include mandatory tree plantings and/or retention.	
	Thank you for putting the plan out there and for the opportunity to provide feedback. I registered to attend the webinar (unfortunately I couldn't make it on the day, but I did watch it	
	afterwards) I would love to see more webinars in future for other council plans and proposals	
49838	Goal 3 Protect. Currently the car and developers are the 'Kings'' of Christchurch. It appears that their needs trump all other considerations. Goal 3 is incompatible with the way	Erin McGill
	Wolfbrook and Williams Corp, among others, are allowed to wreck neighbourhoods with loss of trees, extra cars, LOTS more storm water run-off, and overloading the sewer system.	
	Will this new legislation change that? Developers would have to retain existing trees, not promise to plant tiny saplings. Frankly I don't have much hope for any improvement.	
49839	The plan looks really fantastic - a good way to get us on the right pathway for protecting our existing trees and putting in new trees. I appreciate the need to not put the cart ahead of	William Stewart
	the horses, but I would like to see more action from the council around specifically protecting existing mature trees. While this plan mentions it in passing, it is woefully short on the	
	details, and I do hope that this is an area of priority.	
	It's utterly disgusting to watch mature (20+ year native trees) that are in good health being chopping down simply because it's easier to build over them rather than around them. We	
	need strong systems in place to ensure that the value trees offer and the time delay of replacing mature trees is part of the conversation when it comes to removals. Many mature	
	trees would simply not grow back to the same degree of maturity and canopy cover, as we face more and more weather extremes due to clime action. Once the mature habitat is lost,	
	it's exponentially more difficult to replace, and this is missing from the decision process.	
	We need to set a cost for mature tree removal that accurately reflects the value that these trees provide for our community and the difficulty in replacing them. We need to ensure that developments prioritize keeping existing mature trees and entimize their building plane to ensure their peeds.	
	developments phontize keeping existing mature trees and optimize their building plans to catel to their needs.	
	We also need more marginal land planted with trees, and fewer grassy knolls that do little to absorb carbon or heat and have high ongoing costs in terms of maintenance.	
	We need to ensure that all tree-planting projects have maintenance as part of their project scope. Tree plantings need to be weeded, sprayed, and supported after the initial planting,	
	for several years.	
	Two plantings that are required in mitigation pood to be accessed based on the successful plantings, not the specthat are planted, sounded and dis a four years later.	
49840	The plantings that are required in mitigation need to be assessed based on the successful plantings; not the ones that are planted, counted and the a lew years later.	Ben Liehing
15010		Den Liebnig
	We live in and would love to have a native tree on the berm on the roadside. There was a tree before we moved in, but got knocked down, so there are no cablings,	
	pipes etc.	
49841	I support the plan. The more trees, the better	Brent Silby
49842	There are a number of areas where I think efforts to increase tree density should be considered:	Jonathon Chambers
	any land available for purchase adjacent to new motor ways (which in any cases have already been planted with some pative trees). This land is relatively undesirable for land	
	- any land available for purchase adjacent to new motorways (which in any cases have already been planted with some native trees). This land is relatively undesirable for land development and hence could possibly be obtained by the council relatively cheaply. Planting here will provide a visual barrier blocking the unsightly motorway from adjacent	
	properties. It could also block fumes and buffer some motorway noise. Planting here can also act as nature corridors into the city to improve biodiversity.	
	- planting more intensely in the land adjacent to the rivers in and around the city. There are huge opportunities along the styx river for example where there appears to be a fair	
	amount of open undeveloped land lying adjacent to this.	
	- planting in the crantord basin could be further progressed. There is a large area of land adjacent to Rutland reserve (on the western side of crantord street) that is covered in exotic	
	scrub and willow - it would be great to see the existing plans for native regeneration in this area put into action. Twould like to make you aware of the relatively disappointing results of planting so far in another part of the cranford basin on the eastern side of cranford street. I have been involved in some planting bore by conservation volunteers NZ. It appeared	
	there was a lack of prep work on the ground prior. No mulch was laid. No plant guards were used. In the following 1-2 years a large percentage of the plants planted have been	
	completely choked out by weeds as a consequence. A really disappointing outcome and a waste of plants, effort and time. Please ensure adequate prep work is done with the	
	planting and adequate after care is provided with the plants to give them a good chance of surviving.	
49843	To respond to our climate and biodiversity crises, it's obvious we need much more trees cover in Christchurch. Not only should the red zone be planted as completely as possible in	Kyle Sutherland
	natives, parks and reserves should also be planted fully. Land should be purchased by the Council to plant forests around the outskirts of the city which will also be able to be used as	

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	carbon removals going forward.	
	In terms of property development, all new builds should be required to plant a minimum percentage out in tree cover as part of council sign off, with big penalties for those who don't. Currently sections with mature trees are being completely stripped and covered in concrete, which is why our tree cover has slipped back over the past few years.	
	For us to be considered the garden city in the future, we clearly need to focus on all available options, and with 57% of land in Christchurch being privately owned, that means a lot more focus on protecting existing trees. A full mapping should be done, with protectings placed on mature native trees as early as possible. Property developers will otherwise continue to clear-fell entire sections as they solely focus on their own profits.	
	There's no silver bullet solution here, it requires the focus on every available Council opportunity if the goals set are to be taken seriously and achieved, and it means allocating more budget to ensure our exisiting trees are protected while any new development has minimum coverage. This will encourage native birds back to the city, who will also assist in reforesting.	
49845	Developers buy sections with mature gardens and remove all trees before building.	Susan Levermore
	Does the Council know how many trees are lost in this way?	
	Is there need for better regulations to protect trees on private land?	
	Can the Council's planting plan replace this rapid loss of trees on private land?	
49846	Thank you for creating this plan, it is long overdue. I tautoko the wonderful Mahaanui Iwi Management Plan which I hope provides a strong foundation of this work going forward.	Anna Rumbold
	I would like to begin by noting my disappointment at the current distribution of canopy across the city, particularly in the West of the city in new areas of development. It is a significant oversight by the council that these developments were allowed to go ahead in the first place without ensuring that adequate canopy coverage was provided by developers, and is a great shame.	
	I trust mana whenua and geography experts to understand the range of species and heights that are most appropriate for planting in specific areas.	
	I disagree that trees are in "competition" for space as they are essential. Most significantly the urban heat has been particularly noticeable in the past few years. I would strongly suggest (in discussion with those who have expertise in urban planning) that many of the wider roads could do with additional median tree planting similar to memorial avenue. The asphalt is simply too hot and too harmful to sustainable life. Trees on the side of the road are not enough, and a canopy that covers from the side and the middle is probably required. I see your goal is only 15% by 2070 and I think that is a bit shameful. In 2070 I will be 77 and 15% in that amount of a life is not very ambitious nor does it seem particularly efficacious in achieving good outcomes.	
	Commercial property could also do significantly better than 10%, and residential more than 20%. I am very lucky to live in Fendalton, a 35% + area and can say that the benefits of this are more than could ever be quantified. All residents should be afforded this privilege. People working in commercial areas also deserve uplifting, shaded, green spaces to enjoy at work and this would, on the whole, make ugly places like Blenheim Road a lot more scenic and attractive to people who live and work nearby. It could also reduce road rage on commutes. You could also do some lovely planting next to the new stadium to really encourage the idea for other miserable people who think green space and commercial can't mix.	
	I would prefer if all of these targets were brought forward to sooner than 2070!	
	Please consider this a funding priority and reduce the embarrassing implementation time frame.	
	On a final note, I look forward to the Banks Peninsula plan and hope to see that it includes a strategy for significant reforestation of that land with native planting, as community groups are already trying so hard to achieve.	
49851	The plan looks really fantastic - a good way to get us on the right pathway for protecting our existing trees and putting in new trees. I appreciate the need to not put the cart ahead of the horses, but I would like to see more action from the council around specifically protecting existing mature trees. While this plan mentions it in passing, it is woefully short on the details, and I do hope that this is an area of priority.	Amanda Darrell

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	It's utterly disgusting to watch mature (20+ year native trees) that are in good health being chopping down simply because it's easier to build over them rather than around them. We need strong systems in place to ensure that the value trees offer and the time delay of replacing mature trees is part of the conversation when it comes to removals. Many mature trees would simply not grow back to the same degree of maturity and canopy cover, as we face more and more weather extremes due to clime action. Once the mature habitat is lost, it's exponentially more difficult to replace, and this is missing from the decision process.	
	We need to set a cost for mature tree removal that accurately reflects the value that these trees provide for our community and the difficulty in replacing them. We need to ensure that developments prioritize keeping existing mature trees and optimize their building plans to cater to their needs. We also need more marginal land planted with trees, and fewer grassy knolls that do little to absorb carbon or heat and have high ongoing costs in terms of maintenance.	
	We need to ensure that all tree-planting projects have maintenance as part of their project scope. Tree plantings need to be weeded, sprayed, and supported after the initial planting, for several years.	
	Tree plantings that are required in mitigation need to be assessed based on the successful plantings; not the ones that are planted, counted and die a few years later.	
49852	I love the plan; however I feel like it's not very ambitious. 20% by 2070? I know trees take a long time however I hope that the plan is to increase the tree canopy even higher after 2070 so we have a true "garden city"	George Laxton
	Also I don't see any mention of green walls. City and building walls that are designed to grow greenery which also can have a cooling effect and can look beautiful compared to a concrete wall.	
	I think that while they are not tradition tree canopy, they would make the city more green and a nice place to be. I hope that it is included in future plans.	
	Also I would like to see the inclusion of walking distance to a green space added not just 15% of tree cover for area. I would love to see small plots of land converted to small garden with fruit trees managed in conjunction with local communities and possibly able to produce food as well if there is space on the plot allowing for these to provide food for the community surrounding each of these community gardens as well as a beautiful place for people to relax. I would envisage these only to be as big as a plot used for a house and be scattered around the city. This would mean more people would have a park just around the corner less than 2 to 3 minutes' walk away.	
	I;m glad that Christchurch is looking to improve our tree canopy and it is sad that we are one of the worst (if not the worst) city for tree canopy and I hope within my lifetime and my children's lifetime we become the city with the highest percentage of tree canopy and become a true garden city!	
49903	 Tree types should emphasize change of seasons by their changing leaf colours- a major point of difference of CHCH from other cities Mainly deciduous trees in public space for winter sun and light There needs to be an Urban Design overlay to guide large tree planting eg to create vistas/ frame or screen views/ identify major roading routes / reinforce land use patterns 	John dryden
49964	I approve of this plan as part of a wider effort to reduce our contribution to the climate crisis. Planting trees alone is not going to meet our obligations, and it should not replace overdue action in reducing our emissions in other sectors, especially transport.	Patrick Kennedy
	I also believe that, where appropriate, there should be consideration given to identifying areas which are planted out at first, but then allowed to revert to self-seed and self-support as forest or wetland areas with native planting to provide traditional habitats and safe havens for wildlife.	
	I support the added protections for mature trees on private land, and the provision of information and assistance to landowners to help in identifying the right trees for the right locations.	
50003	Thank you for the thought and effort that's gone into this draft proposal. I fully support all suggestions made and am encouraged by it. I have lamented the loss of our green space and note over and over how other cities incorporate trees in their public spaces and roads. It's past time we acted, and I encourage adoption - well done!	Suellen Knopick
50022	See attachment.	George Sariak
50031	Fantastic!	Piet van Leeuwen
50032	1)The forest cover is a bit misleading. The pine forest at bottle lake might provide recreational opportunities but it does little for biodiversity. Neither do any of the non-native trees on the map.	Alison Evans

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
	2) This is a huge investment and I think the funding would be better spent purchasing land that already has high value biodiversity on it - such as land at Kaitorete, Southern bays e.g., Peraki, Kinloch or adding to the network of conservation land on the extended wildside eg Gough's Bay, Stony Bay. We need to protect what remains rather than trying to recreate a somewhat artificial ecosystem that is unlikely to functional and protect anything other than a few 'tourist' birds. I can see the merit in the project but there are also sound ecological arguments why the large investment of money would be better spent elsewhere.	
50034	I am writing in broad support of your urban forest plan for Ōtautahi. See full submission attached.	Cameron Bradley
	My primary reasons for support are that it will ensure this significant issue is measured, monitored and placed on the Council agenda for years to come. I commend this project for having a relatively measurable and easy to follow action plan. I would also like to warn Council not to underestimate the importance of private developers and homeowners in achieving this goal. It is critical that the Council gets the incentives right so that these people and businesses join the quest for improved tree coverage, rather than fight against it. It has been shown around the world that intensification does not need to come at a cost to tree coverage, with common solutions being green rooftops or lower site building footprints and higher storied developments. However, the types of intensification we see in Christchurch work counterproductively to our tree coverage goals. I would love to see council work to realise a quality high-tree coverage, high-housing stock development so that developers and residents alike can see how this could be done.	
	The detailed feedback I have is as follows:	
	- Goal 4: Involve – I believe there needs to be an objective on involving developers and homeowners in this process.	
	- Objective 1.1, action 7 – as mentioned above, I do not believe the importance of this action can be understated.	
	- Objective 1.1, action 8 – I believe the financial contribution part of this should be reworked. I agree with the 20% target and do not think this should be able to be compromised on. In addition to this I believe that developers should be able to receive a negative offset to their development contributions for achieving higher than average tree coverage.	
	- Objective 1.2, action 1 – if a financial instrument were in place, a simple response would be to alter the financial benefit by ward/suburb where locations with high coverage have little benefit and locations with low coverage have higher benefit.	
50036	I support this proposal	Joanne Nikolaou
50045	Discourse with community members about areas which would benefit from greater tree coverage would be valuable. Involvement of local Kura with planting efforts ensures future generations understand and cherish our tree taonga. Use off plant layering is also of high value in areas where trees are not appropriate for the space shrubs and spaces that allow for ground cover such as native ground creepers leptinella for example allow for additional carbon sink and water management as well as providing more visually appealing urban spaces.	kimberley evans
50049	I think this urban forest plan is wonderful! I am particularly supportive of regeneration of indigenous trees as they are most suited to our environment and will provide safe haven for indigenous fauna. I really love the Chch City Council and Waka Kotahi NZ indigenous mass plantings in green corridors along roads and wetlands for water management, and would love to see this style of plantings in around many of our urban sport parks and along our river banks eg Ernle Clarke Reserve and Opawa river network conservation efforts. Thank you so much for all the work and efforts towards these goals! Ngā mihi nui, Megan McMahon	Megan McMahon
50050	First, this is a fantastics proposal, and I am so glad the council is planning on increasing the tree cover for Christchurch.	Jeremy Clark
	Second, while recognizing the 'right place right tree' approach, I'd like to make a plea that wherever possible, the Council actively prioritise species of decidious trees that can attain a medium to large size. My reasons are as follows:	
	1. Only deciduous trees offer cooling shade in summer but let sunlight through in winter. Natives that keep their fine leaves all year do not.	

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	2. Most species of deciduous trees offer a wide ratio of canopy width to trunk, meaning they provide more USABLE shade in urban locations. Native trees generally have a narrower ratio, so offer less shade directly beneath their canopies.	
	3. Aesthetically, only (some) species of deciduous trees offer the beauty of vibrant autumn colour - e.g., pin oaks, red maples, liquidambars, dogwoods, ornamental cherries. Their seasonal variation greatly adds to the beauty and interest of the urban landscape.	
	4. Culturally, choosing (some) species of deciduous trees (e.g., weeping willows, oaks and beeches) is a way of valuing and respecting the heritage of the Canterbury Association's legitimate and legal purchase and development of Christchurch as a pragmatically utopian (i.e. reformed or improved) English city. Our current tree canopy is a precious aspect of this heritage.	
	To use a family analogy, it is the way of teenagers to initially reject the heritage of their parents (hence a current undervaluing or downplaying of the city's colonial past), but when teenagers grow up into adults, they come to appreciate the good aspects of their parents' heritage. Residents of Christchurch have been bequeathed a stunningly beautiful, English-influenced botanical city.	
	Third and lastly, learning from the experience of Vancouver, Canada, it might be advisable to install slow drip water bags around new tree plantings, as a way to increase survival rates during prolonged dry or windy conditions. We see many dead saplings (native and decidous) that have dried out.	
50051	Please put effort into engaging youth/teens into community plantings and care of their local environments (possible compulsory engagement via the high school health/pe programmes at all ages, so it builds a strong kaitiaki culture within them. This will give them an urgently needed sense of belonging and responsibility for these spaces. Enable/fund trees for people to plant appropriately on their own properties with consultation provided.	Sarah Suckling
50056	Would love to see the CCC put rainwater tanks in parks where they have structures/buildings eg, toilets, halls, sportsrooms to help irrigate trees through initial couple of years and set a good sustainability example to residents and businesses.	Heidi Connolly
	In doing so locals of parks could be encouraged to adopt new trees and help care for them with regular watering and weeding.	
50058	I strongly support this plan and would love to see more tree-lined streets in both the suburbs and the city center.	Alice McLay
50062	I would urge the Council to increase the goal to 30% tree canopy coverage to align with the 3-30-300 rule for green space, as well as focus on equitable canopy coverage across different socio-economic areas. This Plan is a great start, but we can do more.	Willow Patterson-Kane

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
50064	Trees are important for the range of reasons outlined in the document including contributing to a healthy mind and feeling good about our surroundings but - trees cause problems at	Pam Richardson
	certain times of the year -sunshine is vital in the winter months and views important. Leaves cause massive problems. Trees cause flooding when not managed appropriately along	
	water ways etc.	
	Roots in footpaths under powerlines need careful maintenance. It needs to be ongoing and sustainable. Trees also reach maturity, and some eventually need removing e.g. Banks Depingula has many old shelter helts, wilding trees that need to be removed and greate great expanse to remove. Trees along side reads cause shading, dropping limbs over newer	
	lines causing outages etc.	
	lines causing outages etc.	
	I see some huge challenges ahead with management and on funding required - whatever is decided needs to be realistic and manageable.	
	The challenge to motivate communities and volunteers is not always easy. Some will but many will expect the Council to do the the work.	
	No one style of planting is the right one and will need to be tailored to the setting and situation - guidance and suggestions could be provided .	
	I have just picked up the CCC Biodiversity and Open Space Strategies superb documents that were developed with the community. Have these two documents been considered as	
	part of the Orban Tree Strategy - the intervening years have had a different focus as a result of the earth quake repairs .	
	Open space is also important and we need to respect those areas and if planted out should complement what is already in the area	
	open space is also important and we need to respect those areas and in planted out should complement what is already in the area.	
	Before the Banks Peninsula area is considered there should be early discussion sharing of info and any proposals with landowners. Federated Farmers, Banks Peninsula	
	Conservation Trust ,our Rununga's , the many Trusts and conservation groups , ecological experts , Hinewai etc .	
	Our indigenous biodiversity is very special and unique as identified in the Biodiversity Strategy .	
	Let's focus on the existing Strategies . They are stunning documents and provide opportunities and guidance for a vast range of issues.	
	We need to know what we have before greating outprojue new plantings	
	we need to know what we have before creating extensive new plantings.	
	Maybe the introduction of exotic plantings should be discouraged	
	Wildings are an issue - Banks Peninsula is being put at considerable risk with the types of plantings and we need to focus on caring for what we have and allowing natural regeneration	
	. We need to keep unwanted weeds away and 'out of' our significant indigenous vegetation. Weed and pest control is vital to protect our indigenous vegetation.	
	I would ask the question - is a tree policy really necessary for Banks Peninsula. Would we not get better outcomes looking at protecting our indigenous biodiversity. We can't do	
	everything - we are creating too many issues and further creating confusion for landowners and our community.	
	Our community and I would you much approxiate and welcome a Wood Strategy instead compthing to guide us in protecting our enopial place Danke Designable	
50067	Our community and i would very much appreciate and welcome a weed strategy instead something to guide us in protecting our special place Banks Peninsula .	Androw Dakors
10001	s mere a pointy for protection of existing mees, other mannentage mees, on private properties: in not, i believe mere needs to be, particularly in the case of property subdivision. Should it be necessary to remove significant trees for development purposes, a minimum requirement should be appropriate compensation measures.	
50076	To see trees planted that can be climbed on would be incredible	Charlotte Shand
50077	I would love to see more trees around that are accessible for nature play for our tamariki	Katherine Shand
50011	would love to see more trees around that are accessible for nature play for our tamanki.	
	Trees that can be climbed and explored.	
50102	The rule of thumb is you can't have too many trees - the more trees the better.	Ramzi Addison
	If you look across London you see trees. They make cities liveable. They breathe for us.	
	Don't make it too complicated. Be very careful of lobbying from vested interests that just want to make as much money as they can by squeezing the land.	
	The best time to plant a tree is ten years ago. Just get them in the ground. Your grandchildren will honour you.	
50135	See attached	Ian Spellerberg

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
50156	Great plan. We also need to make sure new land being consented for development/intensification is not going to have an impact on local eco system. For example, land being	Nikhil Rampal
	subdivided for 40 houses to be built at the top of Bowenvale Avenuue, which which just have detrimental impact on the eco system in the bowenvale reserve.	
50158	Don't neglect the heritage of the pioneer settlers in all this and ensure equal rights are given to plantings of trees like Oak, Walnut, Chestnut, Hazel, etc. My father told me of the old	Margaret McMahon
	medicinal remedies his grandmother would make from the trees the settlers brought with them. They would use food collected from the land all around the city in his youth, making	
	all manner of preserved goods. Plants seeded from others brought here years before. My worry is the drive to wipe out our history will see the loss of what I see as my heritage. Those	
	plants had value then and still do, especially today, food producing trees are particularly relevant. A great idea would be to plant a whole area for foraging with nut and fruit trees. It	
	would also be educational but would need to be very large to be relevant and useful. That would really be planting for the future.	
50161	Can we also plant fruit trees please? There needs to be more food available to forage outside of supermarkets. I've seen pear trees with large canopies in Halswell but nowhere else.	Alma De Anda
	This is a great opportunity to increase food availability for the public, especially the unhoused.	
50172	As a guardian of mature and historic trees [] work at Riccarton house] [fully support this plan to increase the tree canony around the city. It is becoming increasingly obvious that a	Alan Bowles
50172	significant number of trees are being removed to make way for housing developments. The section on Clyde Road featured in the Press newspaper being a prime example. Therefore	And Dowles
	planting trees on public land may help to offset this to a certain degree. It has also been disappointing to see some poor choices on tree species used and their positioning on some	
	of the city streets. Trees are planted too close together or will grow too big for their location resulting in removal or frequent pruning. The trees along Manchester Street are a prime	
	example of this. As you have also stated. Trees take many years to mature so I would like to see as much protection to existing trees as possible. I would also like to see a good mix	
	of native and exotic trees planted as this represents the story of the city. thanks.	
50177	It's a wonderful plan. Having lived in various countries around the world, I have experienced the detrimental effects of when there are not enough trees and too much concrete, which	Christine Wehrmeier
	leads to extreme heat and wasted energy consumption. I have also enjoyed places where there are many trees and wholeheartedly agree that trees are important not just from a	
	climate perspective but also for our wellbeing.	
	There is one thing that I notice that is not mentioned here, and it seems to me that it is related and relevant. It is also very important for the city to reduce the amount of concrete and	
	non-porous surfaces on the ground. I have noticed, since moving to Christchurch, that although single houses may often sit on large plots of land, a large percentage of that land is	
	often covered with concrete, tarmac or other hard surfaces - usually to accommodate for driveways and somewhere to park cars.	
	Just as important as trees, we also need enough exposed ground to absorb rainfall, to protect the water table and prevent erosion. In London (UK), the wide use of astroturf, concrete	
	and other hard surfaces in private properties have caused huge problems with hash hooding, because neavy rainfait has nowhere to go. In indonesia i have also seen this led to	
	incroase	
	Increase.	
	example nermeable navers eco-grids or gravel	
	And finally, it would also be good to educated residents around what is good to plant to support the ecosystem. For example, lawn does little to contribute to ecosystems. Aside from	
	requiring lots of maintenance, it removes sources of food for native animals, reduces shade and places for birds to inhabit and nest. Rewilding our gardens would be an interesting	
	and sustainable idea, not just planting more trees.	
	That said, this project looks wonderful and will make Christchurch even more pleasant to live in. Thank you.	
50210	This is fantastic and I support it. I think we can go harder. More trees planted and protected on private land, especially wide-open spaces and commercial areas that are hugely	Jane Nuttridge
	concrete with no trees. I think we can go harder out on this. It's too important. Let's speed it up and aim for even higher cover! Thanks!	
50233	Generally, support the plan, higher tree coverage is beneficial on multiple accounts.	Aric Thorn
	Une area which I would like more information / more focus on is the lack of tree coverage on the port hills. Due to the proximity to the city, I would presume the Christchurch facing bills would be a fair source of stormwater for the block post to consume and all the menoy required to build the established area at a With most of the bills being twee all the terms	
	mus would be a fair source of stormwater for the Heathcoat to consume and all the money required to build the catchment areas etc. With most of the hills being tussocks that are	
	grazed by sneep, except for small pockets such as victoria Park, there seems like a great opportunity to utilise very un-utilised land. Walking through Victoria park's forest tracks on a	
	hot day nand down beats a nike up one of the trails on Huntsbury of Rapaki.	
	A model has been set out in the Hinewai reserve on hanks peninsula as to how this can be achieved on a mass scale in an economic fashion. How about we start with a couple of the	
	Tussocked hillsides (say Mt Vernon & Montgomery Spur), get Hugh Wilson to give us his insights and get it started!	

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	If there is a rational as to why we shouldn't be foresting the port hills. I would be interested in any information you could direct me to.	
50240	it's a good thing sure, but whos going to clean up the leaf litter in Autumn though and also attend to gutter cleaning in case you have a heavy downpour, may pay to think about that, i tend to think, not against it i'm just thinking ahead :)	Craig Dance
50246	Creating an Urban Canopy in Otautahi	Matiu Rodgers
	The existing urban forest in Ōtautahi/Christchurch has strong cultural and community connections such as Deans bush or Ernle Clark reserve as excellent examples. These areas should be focused upon as examples of creating urban "biodiversity islands" within the urban fabric. On our doorstep we must not forget and squander the amazing opportunity afforded to us from the tragedy of the earthquakes. Prioritizing planting out the red zone and other green spaces to increase tree canopy cover and promote ecological sustainability is key to my submission and taking a common-sense approach. Open green spaces such as parks, reserves, and public spaces can provide habitat for native wildlife, support local food systems, and provide opportunities for recreation and community gathering.	
	Another concern I want to raise is futureproofing renewable energy storage in the city. Street planting maybe the current trend in urban development, however, the need to balance streetscape tree canopy coverage with solar access should also be considered, as urban trees can impact the energy efficiency of buildings and the feasibility of solar power. Careful planning and design are necessary to balance the benefits of increased canopy cover with the need for solar access. not to mention overhead powerlines and other utilities.	
	Working with local iwi and hapū to identify culturally significant species and areas is crucial to protecting and enhancing Mahinga kai. Planting out open spaces to create biodiversity islands can be an effective way to promote ecological sustainability and support native wildlife populations. The red zone in Christchurch provides a unique opportunity to create large-scale biodiversity islands that can help to support the recovery of native wildlife populations. And this of course should be the primary focus for utilising ratepayers' money as it has been a promise by the council ever since the earthquakes.	
	Using food forests to create a canopy is a sustainable and multifunctional solution to the problem of tree canopies in cities. Fruit and nut trees are larger and have a more spreading canopy than ornamental trees, providing shade to help cool the surrounding area. Additionally, they provide a source of food for both humans and wildlife, which could help to increase biodiversity in the area.	
	It's important to focus on planting native flora, which is better adapted to the local environment and can provide important habitat and food sources for native wildlife. Planting native species can also help to preserve local biodiversity and cultural heritage.	
	To maximize canopy coverage, the city could choose fruit and nut tree varieties that grow well in the local climate and soil conditions, and space them out appropriately to allow for maximum growth and spread. The city could also consider incorporating other types of trees and shrubs that are known for their ability to provide shade and support a healthy ecosystem, such as native species and nitrogen-fixing plants. By recognizing and valuing the cultural and community connection to the urban forest in Ōtautahi/Christchurch, we can work collaboratively to protect and enhance this important resource for future generations.	
50264	I am encouraged to see that the Urban Forest Plan proposes a comprehensive approach to maintaining and growing the city's tree canopy cover. The plan's focus on a strategic and sequential approach, with ongoing, immediate, and longer-term actions, is essential to ensure the sustained growth of the urban forest over time.	Fernando Cagua
	Furthermore, the plan's emphasis on planting trees as a means of achieving the targets is a sound approach. Studies have shown that the benefits of urban trees, such as supporting stormwater management and sequestering carbon, far outweigh the costs of planting and maintaining them.	
	However, while the proposed targets are ambitious, **I suggest that even more ambitious targets should be considered**. Higher targets would not only provide greater benefits to the city's environment and communities, but also put the city at the forefront of global efforts to combat climate change and enhance urban resilience.	
	Research has shown that urban forests with high canopy cover can reduce temperatures, improve air quality, and mitigate the impacts of extreme weather events. Therefore, setting more ambitious targets for canopy cover, would provide even greater benefits to the city's environment and residents.	
	Moreover, more ambitious targets would encourage greater investment in urban forestry and create more opportunities for community engagement and volunteerism. The success of the plan relies on collaboration and partnerships with stakeholders, including mana whenua, community groups, and landowners. Higher targets would provide a stronger incentive for these groups to get involved and support the growth and management of the urban forest.	

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
	In conclusion, while the Urban Forest Plan is a commendable initiative, more ambitious targets for canopy cover should be considered. Higher targets would provide greater	
	environmental and social benefits and encourage greater investment and engagement in urban forestry.	
50265	This is a great iniative and I am very much in favour. I would like to see more protection for existing trees on private land as well.	Alicia Moggre
50274	Better and more transparent processes are needed for community engagement in extra planting. For example, we have been requesting trees for our treeless street for 18 months and	Noel Meek
	have received no response nor feedback on the process (nor any planting) - it would be great to know how it happens and why it might not be happening.	
50000	How does the Red Zone factor into this plan?	
50280	Ine plan should include strategic thinking about biodiversity outcomes, not just planting trees. There is no integration with the Banks Peninsula Ecological Vision, the Strategy for Te	Mark Christensen
	Kakanu Kanukura - http://www.tekakanu.org.nz/index.php/stategic-vision/strategy, or Pest Free Banks Peninsula, both of which any urban tree strategy needs to be integrated with.	
50283	Objective 1.1 – "Investigate ways Council can incentivise and support private landowners to retain and plant more trees." Only investigating does not go far enough recommend	Sarah Macfarlane
50205	Council establishing incentives	Suran Macianane
	Objective 1.4 – only looks at surveying and developing targets for tree cover on banks peninsula – recommend there be longer-term actions beyond this, like working with the	
	communities on planting projects.	
	I support objectives 2.3 and 2.4, 4.1, 4.2, 4.3 – yes!! Recommend 4.2 could not only engage with groups, but resource them too, for assisting with planning, management, and	
	advocacy for urban trees.	
	Overall Lamin support of this plan, it would also be great to see this plan as part of a wider effort for climate shange mitigation, that includes native plantings, planting to protect	
	waterways and wetland restoration	
50287	I think this is very important in many areas, but also specifically with the amount of stacked apartment redevelopments occurring in places like Saint Albans. It seems like we currently	Jacob Wadsworth
00201	have decent comparative coverage, but that is steadily decreasing.	
	I believe it is important that we address policy as soon as possible with regards to these redevelopments to prevent an excess of residential urban heat islands forming. Judging by the	
	modern stacked apartment builds in places like Manchester Street - developers are simply not prepared to address this issue of their own volition and will not do the right thing for us	
	all unless forced to do so.	
50294	I fully support urban forests that encourage biodiversity. However, if we want biodiversity we need to ensure predators such as domestic cats are controlled. As Urban and suburban	Claire Coveney
	areas see increasing intensive housing, we also get increasing numbers of cats and dogs.	
	As far as reducing emissions, the best trees are perennial trees that do not shed so many leaves. Our native trees are perfect for this. I love many exotic trees, but they should only be	
	trees that attract and feed birds. Trees for the 4 seasons are beautiful but need to be carefully placed so all those with their leaf blowers don't send their leaves into the gutters.	
	clogging up drains.	
	Trees and permeable surfaces are both important.	
	The health benefits of trees have been documented by research in Auckland and overseas as enhancing children's health, reducing heating, providing shade.	
	Diskt has sight along the later of the back has been been been been been been been bee	
	Right tree, right place. However, all old trees that are healthy should be protected. Trees take a long time to grow.	
	Mulching and keeping vehicles away from trees to protect their health according to arborists helps reduce disease and dangers of limbs breaking off	
	matering and heeping remeted and non-deep to protect their neutral decorang to aborists helps reduce discuse and dangers of innos breaking on.	
	In Subruban areas with high density housing there is now little room for larger evergreen trees. What a major mistake in planning.	
	I hope council will consider this in the future.	
50295	Great to see a plan for this in place. The right tree, right place, right function is a reasonable approach, but it would be useful to build out what that means to existing trees and future	Megan Gallagher
	trees. Particularly with developers or infrastructure expansion. How do you integrate the true value of trees into council processes for consent etc. Integrating the approach with	
	broader biodiversity outcomes would also be good. Animals can utilise the trees and motorways to get into the city for people to protect and enjoy. An approach to native trees is	

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	important- how can we support nature to regrow native bush or forest that would have existed before humans? What is the plan to engage people and gain their buy in for this	
	process? How can you create unstoppable momentum that will mean neighbours collaborate to keep trees rather than bicker to remove them?	
50300	I support your plan and endorse it. Yes, development, property and business owners need to take responsibility. Silver birches must be REPLACED. They are a serious allergen and make a terrible mess for residents to clean up.	Beatrice Cheer
50302	See attachment	Jaimita de Jongh
50320	I would like to see a focus on native trees and bush. Native plants should be used as a first choice and non-natives only considered where a native would not be suited.	Sophie Pattillo
50409	Please see the attached file	Ashley Campbell
50411	Exceptionally good initiative! The greater Birkdale and Horseshoe reserves and some lands around them need to double or triple the number of trees on them. That will surely make a very efficient stabilization and protection of urban environment and lands after the earthquake, utilize the territory very efficiently, give as a tree park or even a forest, and provide city lounges. The new stadium could be a good place for a park, but if we implement the above suggestions, then all will be well compensated.	Valera Terentiev
50419	Priority must be given in planning to green spaces, and to the choices being made around what is being planted. New footpaths and underground pipes can damage mature tree roots and trees and new trees can cause issues with older footpaths. The lack of cooperation and coordination by CCC historically in developing and implementing solutions to this that aren't "chop it down" needs to change going forward. Mature trees are essential in any plan for Urban Foresting, several native species require a degree of existing tree cover to survive and grow. There must be a wider view on parks, street trees and integrating green corridors around the city. A good example of this is MacFarlane Park in Shriely which exists as a corridor within the residential area stretching several blocks and that will provide tree canopy (much of which is still in the early stages of planting) for much of the area alongside community services and facilities. There must be a push for more native varieties where possible and a marked push within that to restore as many species as possible that were endemic to Otautahi that have since been lost. Alongside that, there should be a move that where possible the varieties should enhance the space with colour and diversity not just cookie cutter trees.	Harrison McEvoy
50426	I wholeheartedly support this plan. Trees are vital.	Jack van Beynen
50428	I absolutely support this Plan. It's comprehensive and inspirational.	Jane Higgins
	1) I totally agree that trees should be regarded as critical infrastructure. This is more urgent than ever now that climate change is ramping up.	
	2) We absolutely need to significantly increase our canopy cover and that cover needs to be distributed equitably (which is far from the case at present). I agree that priority should be given to areas that are more or less barren - not just the new developments, but also in East Christchurch where canopy cover has long been lacking (and where the streets are surely broad enough to be redesigned to include many sizable plantings).	
	3) Parks are of course crucially important - but as intensification proceeds apace, I think that street environments must become the new 'back yard.' Not everyone has a park on their doorstep and children in particular need to be in touch with nature right where they live. Street trees and the design of streets need to be friendly to children, pedestrians, cyclists, dog walkers etc. (While I support native planting wherever possible, could I make a plea to not use cabbage trees as street trees - they don't provide much canopy and their leaves are not compostable and provide a reason for people to complain about having street trees.)	
	4) I'm alarmed at how quickly trees and gardens are disappearing from our suburbs. Very quickly indeed. I'm also not impressed by the gestures towards landscaping that many private developers are making - single trees are often planted on tiny plots in isolation from other vegetation and it doesn't take much foresight to imagine that these will wither and die quite quickly.) I strongly support whatever levers the Council can muster to work with developers to create landscapes that enhance the urban forest. If more rules and regulations are needed to make this happen, I'm very happy with that. I'm not convinced that financial contributions are effective, unless they are very significant. They have the drawback of redistributing trees away from new developments as developers choose the 'easy' option of paying a contribution and not bothering with landscaping.	
	5) This is all so important - I would like to see this adopted in its entirety and implemented with maximum urgency.	
50436	I love Ōtautahi, due largely to the green spaces and trees here, and the communities who care about looking after the places we live.	Tria Manley
	I rode my bike to a friend's house yesterday in the 30-degree heat. I cycled through Hagley Park and felt immense gratitude for the shade the trees provided. As the impacts of the climate crisis intensify, protecting our existing trees and planting more makes so much sense.	
	When I read the Ōtautahi Urban Forest Plan, I was pretty excited to see the breadth of considerations you've included. Overall, I support this and am so keen to see the vision become a reality.	

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)
	I have a couple of thoughts
	Have more ambitious timeframes (bring them forward). This could include ways for the people of Ōtautahi to create neighbourhood nurseries and increase the number of pare available to plant, sooner.
	Look to Hinewai for inspiration and direction for ways to sustainably reforest Banks Peninsula.
	Increase protection for existing old and exotic trees, especially in the Red Zone and areas flagged for urban housing development
	Ensure the equity approach in the Plan is honoured, so that suburbs with the lowest canopy cover, which also generally correlate with lower socio-economic areas, are price planting and tree maintenance.
	Have genuine engagement with the people and companies who are most likely to oppose this plan, to create understanding and agreement about the necessity of the Plan blockers)
50437	My first piece of feedback is this is an amazing urban forest plan, it is really leading in the NZ urban forest context.
	I have only two areas for suggestions as outlined below:
	1. In the chapter titled "Looking across the district" Diversity (page 10) The graphic identifies the top ten most represented species. I noticed that species that have a shorter life span (such as Betula, Prunus, Sophora, Plagianthus) compared to lived trees such as Quercus or Podocarpus make up is about 42% of the top ten species.
	Longer lived species should be prioritised for future planting, as they cost generally the same to plant and establish compared to shorter lifespan trees, but they last in the for much longer which creates a saving to council. Gregory M. Moore (2022) Lifetime cost models for large, long-lived, street trees in Australia, Arboricultural Journal, 44:1, 2 10.1080/03071375.2021.2014689
	In this image on page 10, I also noticed Cordyline australis listed as a tree species. This is not a canopy tree (of even a tree), and its environmental service benefits are of less compared to a canopy tree.
	2. In Goal 2 (page 18)
	Action 2.5 should also consider planting the largest species a site can support. By selecting the biggest tree species, a site can support, it can maximise the canopy area for location. Ensuring the best canopy potential is met across the city.
50443	I would like to know what's happening to the cordoned off areas around Kyle Park. The grass is overgrown and large trees near the houses are a fire hazard and are over ha need to be pruned. These fences were. Put up due to asbestos found in the ground which was years ago and not alot has been done about maintaining it.
50454	Full submission attached. Please consider planting trees and creating spaces that allow children to climb trees, create huts/dens in or under, and play. Tree climbing prom
	development of gross motor skills, coordination, as well as problem-solving and creativity in a way that standard playground equipment can never emulate.
	Appropriate rick taking activities are essential for children to develop their resilience, and this will reduce the rick of them developing anyiety later in their lives
50459	I like the general plan. I would like it to underline that we plant native trees only and that they are ones that are/used to be common in the Christchurch area.
50463	I strongly support the intent and goals within this plan, so important for our city now and well into the future. It's so great to see this.
	The importance of trees for so many outcomes is important and I'd like to see more emphasis on trees in riparian zones, as part of ki uta ki tai, as part of wildness and natur
	tor wellbeing and improved mental health. How all these important values are all balanced and weighed up is important and perhaps a bit difficult. How will this be done?
50161	good to have clarity on now this plan within with many other CCC policies, and now the many different parts of CCC Will Work together rather than in A siloed approach.
50465	This plan looks wonderful in general. Please include more information and advocacy for the relationship between children, their families and trees. Climbing trees and get
50 105	know trees is tremendously good for children's well-being; my children recognise many of the trees in the botanic gardens, deans bush, and other places, but we've been to

	Name
plants that	
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	Daniel Tipping
longer	
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ser value	
that	
nging and	Jessica Flanagan
otes the	Naomi Ishihara
	Nadine Koska
e play and t would be	Miria Goodwin
	Julie Strathern
ing to old they	Anneke Beardsley

ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
	can't climb them. Please include trees in the plan for this! I really like the idea of local "businesses" looking after trees, but also please include local schools and preachools, local	
	streets, local neighbourhoods This would be an amazing thing for young people to get involved with now and be able to understand that future generations will benefit from.	
50466	Please give priority to selection of trees and protection of trees which are suitable for children's play. We live in Longhurst, and my tree-climbing loving son has no trees to climb in walking distance of our house, even though there have been numerous trees planted. There also aren't any at his new-build school.	Rebecca Jacka
50471	I strongly support the urban forest plan for Ōtautahi Christchurch and especially endorse the concern for the need to mitigate climate change. The plan contains a wealth of	Margaret Lovell-Smith
	information about the benefits of trees and the development of an urban 'forest' and deserves to be widely read and understood. Climate change can no longer be ignored; planting, cherishing and protecting trees is one of the easiest mitigating actions that can be taken by any community.	
	My main message is that I would like to see the city council give the plan high priority and put it into action as quickly as possible.	
	Advocacy and Education: More specifically I'd like to comment on the need for advocacy and education. In my community I frequently see beautiful mature trees on private land cut down, for no obvious reason. This suggests to me a lack of understanding about the benefits of trees and the ways in which they can be looked after and made safe. It may also suggest a need for funding support for owners of large trees on private land. Many people cannot afford to engage a skilled arborist to keep their trees healthy and safe, and cutting them down is often the cheapest option. When damaging storms occur trees can be seen as part of the problem, especially when they fall across roads or on to power lines. Education about the need for the right tree to be planted in the right location, as proposed under Goal 2, is also important.	
	I see that 'providing ongoing education and awareness' is mentioned under Goal 4 'Involve' but I see it as equally important under all the goals. Even under Goal 4 the educational actions proposed (p. 28) are not funded for the current year. The creation of an educational online hub is suggested, but needs funding, and why just online? A physical presence in the central city staffed by enthusiastic advocates who are available to go and speak to local groups and engage with residents, will have far more impact. As an interim measure leaders of some of the existing organisations in the city who are passionate about trees, could be employed (part-time) to speak, educate and advocate for trees throughout the community. Owners of sections containing mature trees could be encouraged and helped to have their trees listed as protected trees in the District Plan.	
	Where significant new planting takes place on Council land there is an opportunity for further education using interpretation boards which explain why the planting is being done, the benefits that trees bring to the city, and opportunities for community participation. To highlight the Council's commitment to mitigating the impact of climate change colourful generic, instantly recognisable educational boards could be produced and installed as visible reminders that the Council is taking climate change seriously.	
	Compatibility with other Council plans: Another issue is a need for the urban forest plan to integrate with other plans under discussion such as the Housing and Business Choice Plan. Experience so far shows that further densification in suburbs inevitably leads to trees being cut down and twenty years is a long time to wait for tree canopy to be replaced (as proposed on p.23). Instead of imposing further penalties or regulation to prevent mature trees from being removed another approach could be to provide incentives to those developers who retain trees on their building sites. Good models of places where this has happened could be widely publicised and commended.	
50474	Aiming for over 15% cover across streets and neighbourhoods is a great goal for Otautahi Christchurch, let's do this! Let's also remember to protect our existing trees (eg. protecting trees during development) please.	Nancy Vance
	Regarding the benefits of urban trees + trees as critical infrastructure, there is a lot of good information here. The document is however missing:	
	1. design benefits and spatial infrastructure,	
	2. transport benefits, and	
	3. stormwater benefits and erosion control infrastructure	
	Including:	
	- Trees offer street character, eg. Fisher Ave or Linwood Ave	
	- Trees offer spatial definition and frame streets, eg. Bealey Ave or Totara St (vs. no trees England St or Colenso St)	
	- Street tree planting slows traffic, eg. Rose St	
	- Trees create community gateways, eg. Golden Elm at South Library entry, Colombo St	
	- The presence and character of street trees has an important role in determining visual amenity of residential streets	

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	- Trees help with legibility and wayfinding in a city, much like architecture does	
	- Trees intercept, capture, and store rainfall in the canopy and root zone	
	- The roots help retain stopes/prevent erosion, eg. Asingrove rice along Opawano Heatricote River	
	The Actions call for assessments identifying where "cover is low" and where "land may be acquired for purpose increasing tree cover" and to "map available spaces for planting trees	
	within streets". It will be important to ensure that there is a design process following these exercises to confirm that "the right tree" is selected as part of an integrated design, thus	
	ensuring:	
	1 street/neighbourbood/park sharaster is understood and enhanced	
	2. spatial requirements are understood.	
	3. amenity is improved,	
	4. landscape is reflecting community and cultural identity, and	
	5. planting is intentional for a rich and engaging programme.	
50475	Full submission attached. I think this is a good idea.	Dave Gardner
	Planting trees	
	Acquisition of suitable land for planting trees:	
	1) Purchase properties at the end of no exit streets to allow	
	A good example of this is "Marcella Reserve", This allows people to have quiet streets, while allowing for people to travel quickly via walking, cycling, or scootering.	
	2)Purchase some empty land in the central city for mini forests	
	3)Buy multiple blocks of land and have the city council develop apartments itself while having sizeable area for trees	
	4)buy properties to create connecting reserves	
	For example Barnes Reserve > Aylsham Reserve > Sharnbrook Reserve	
	Enhancing the streets:	
	1)Narrow west to east running streets to allow for trees to be planted only on the North side of the street to keep the road cooler while keeping the south side tree free, to not block	
	sun from entering people's houses in the winter.	
	2)Close of some "crossroads" diagonally to allow for some trees to be planted and to quieten streets for example "Division Street/Elizabeth Street intersection"	
	3)Making some entrances or roads one way	
	for example "Papanui Road/Horner Street" or "Main North Road/Winters Road"	
	4)Narrow some areas of streets to allow tree planting for example "25 Perry Street"	
	5)Trees like Barnes Road	
50480	Lapplaud this plan and I desperately hope it will survive the funding allocation process - because this is vital to our future resilience as a city in a climate change affected world. This is	Jo Drvsdall
	not a "nice to have". This is an essential step towards reversing the degradation of our urban environment and biodiversity, and ultimately affects our own survival. Our trees have	
	been frighteningly undervalued.	
	A couple of small things I think it's worth thinking about. I really like the importance you've placed on street plantings in reducing summer heat effects. They are also great ways to	
	establish bird corridors when densification means landowners no longer have the space to plant trees. While you have a consultation process on street redesign and plantings, it	
	saddens me when i see beautiful specimen trees go in, only to be badly topped or chopped down - presumably by the residents in the property they are in front of. When you consider the years and the work that have gone into growing a tree to that point, it seems like such a waste. While I'm 100% pro-tree and I'd love to see these wordals prosecuted. I recognise	
	the years and the work that have gone into growing a tree to that point, it seems like such a waste, while i in 100% pro-tree and i d tove to see these valuats prosecuted, recognise that proof is difficult to come by Would a better approach be to survey each street front property on a street that is being redeveloped, so that they can record "Lam bappy to have	
	trees on my berm/l am happy to have shrubs/flax/grasses on my berm/l don't want plantings on my berm" to reduce this sad waste? (Though I guess the cost of this vs. the cost of	
	losing a few trees may not stack up.)	
ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
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	 I also feel like property owners are very unclear about what plantings they can put on their berms - it would be great to see a public education campaign on this so that people who want to do something better than monocultures of grass know how to check for services etc, and have a guide to what is best to plant. I'm really in favour of the work you are doing to let recession planes guide your plantings - so I'd love to see another public education campaign that makes this thinking accessible and easy to understand for property owners/developers who are planting on their own properties. Guides to suitable species for different situations would be very welcome. I'd also like to see more controls placed on what developers can cut down. Our mature trees are a precious taonga and should be prioritised and designed around if at all possible - this also makes for much more pleasant living spaces for the new residents! While we do need to densify, we should not prioritise cramming the maximum number of units onto a property over valuable mature trees. (And developers who have protected trees that suddenly, conveniently die should be prosecuted.) Regarding the red zone: yes, please reforest the 15-20% that can be reforested, and reinstate the wetlands - what's happened up north recently should be enough evidence of the vital nature of wetlands and a "sponge city". It's also a huge biodiversity plus! the redzone is the silver lining of the tragedy of the earthquakes - our one chance to create a city-to sea wildlife corridor with tremendous benefits. I understand that developers are already seeking out this land - please show us how the most vital parts of it will be protected for biodiversity, climate change resilience, and recreation. 	
50402	Finally, I love this plan. The people who have put in the mahi to develop this have my admiration. Well done!	La sinta Daille
50482	I would like to support this plan. I would like additional and enforced protection of heritage trees, particularly hative species on Private land,	
50483	equitable as possible as soon as possible. I am particularly keen to see trees planted in public places, particularly streets since I highly value being able to use streets shaded by trees. My feeling is that public trees are a better investment given that privately owned trees are too easily removed, particularly in a time of housing intensification (which I support). Despite that, I agree with trying to protect trees on private land as well.	Chrys Horn
50485	I am part of a tiny forest regeneration project, and river network group.	Claire Coveney
	I have listened to and read widely on trees benefits to all. I think the lack of protection of trees on private land at this point in time is being overlooked. AN arborist should inspect private land clearance before consent is given to clear feel whole sections. These trees are ofter at rear ir side, not large or are, as in Opawa Road should have been protected because of their history and forming an avenue.	
	Much money has been wasted on planting trees not under the supervision of experts but by contractors who have no idea.	
	The same applies to maintenance. If council is going to spend this money on planting, then the contractors need supervisors. A kahikatea was cut down due to the contractor not knowing what the tree was or its values.	
	The maintenance at present is poor. Overgrown with weeds such as convolvukus and American Ivy. Leaving it to volunteers to try to liberate trees and plants x weeds.	
	There is lack of mulch around our older trees as in by Ford Road and Garlands Road footbridge as example. According to arborist the 150-year-old trees health is protected if they are mulched well.	
	Another reason trees don't maintain health when planted in public areas are cars love to park under them, compounding the soil.	
	Poor policies and funding and skills are causing damage. Invest in mulch, supervision of contractors, keeping g cars from parking.	
	New trees also suffer when dogs are allowed to roam free and do their business. Being a dog lover i understand dog behaviors when they see a stick marking a tree. In our tiny forest I see dogs on the loose and poop on top of a new plant or pee.	
	People like Di Lucas and Colin Meurk have huge expertise on these issues.	
	Whilst I applaud this effort it beggars' belief that Christchurch Square is like a desert. Hardly a tree for shelter. As a pedestrian and cyclist trees make a difference.	

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	I strongly advocate for protection of all trees on private and public land, keep them healthy, keep them safe. Invest in good systems for maintenance and skilled supervisors so you don't waste time and money. Too much money is wasted by unnecessary lawn mowing.	
	To keep the trees healthy the contractors moving need to be more respectful of trees instead if bashing into them. They also need to get iff their backsides and pick up the rubbish they chop up which easily blows into gutters and waterways.	
50486	I'd like see parks managed more by community. Line pldntjnv natives, veggie gardens and food forrest	Zane Crofts
	I'd like to see more street trees there sosmy streets without them.	
	And diverse trees it's not good to plant awgole street in oaksdjr example cause they all grow big znd shade whole street. But if you stagger them out and plant smaller trees like magnolia the strata of trees is high to low and allows good amount sun.	
	Also more diverse not just 1 or 2 types of trees on a street let's get more creative.	
	I'd like see more fruit trees in parks. The council nursery should be grafting Edible varietys onto rootstocks instead of ornamental cherry, plums, apples etc and horschesnut with is not Edible so we should plant Edible chestnut instead.	
	Be great to have community and rangers working together I'm currently working on project called Edible Streets to teach people propagate fruit trees and organize planting days to plant them in parks or on along people's fence line on their property so people can harvest as they walk by as it doesn't work plant fruit trees on streets snd gave fruit dropping on footpaths.	
	And community groups can adopt a park to look after the managemtof fruit trees dnd also be run as workshops teaching people how prune fruit trees	
	I've currently got small nursery at home with 100 fruit trees that will be ready in a year to plant.	
	With climate change and inflation looking food sovereignty is highly important and needs be part of our city's strategy for our tree canopy	
50487	There's tons more space for trees! I'd like to see a focus on reducing impervious surfaces (roads nearly 6 lanes wide that only need to be 4) and putting in tree wells, protected from parking damage. This should reduce flood risk on top of all the other benefits.	Justin Rogers
50488	I think the plan is comprehensive and well-developed, and I look forward to it being put into action. One aspect I believe has not been considered sufficiently is the risks posed by trees in natural hazard situations - including stormwater drain blockage during flooding events, risks to people and property of fallen trees and branches due to strong winds, and wildfire risks. These risks are likely to increase over time due to climate change. The Urban Forest plan wouldn't be complete without incorporating strategies for mitigating these	Andrew DC
	risks.	
50489	Full submission attached. Thank you for the opportunity to submit to the Otautahi Christchurch Urban Forest Plan.	Matthew Vere
	I have completed an Environmental Science and Geography degree at the University of Canterbury. I work as a waterways monitoring assistant for the university and volunteer as a pest trapper for Predator free Riccarton and University of Canterbury's Envirosoc society. As a student, I know a lot about urban forests. I support planting and restoration events for university clubs such as SVA and Envirosoc, volunteer for the Waituutu community gardens and have researched and reported the benefits of starting nurseries for vegetating urban spaces. But I will be clear that the views in this submission are my own and do not necessarily reflect any of the stances of the groups mentioned above.	
	I would like to expand on a report I worked on through a university geography class with the St Albans resident association. The aim of the project was to identify what native riparian planting methods should be applied in Abberley Park to improve St Albans stream health? I particularly support the goal to vegetate 75% of waterways, as it validates the recommendations, we made to plant the river's edge with native vegetation, to benefit water quality, ecosystem health and community resilience.	
	Our research into plant species selection, riparian planting methods and maintenance, greenspace and bluespace, community engagement, cultural significance and stream health aligns with the goals set out in the plan. The benefits of greenspace, including climate mitigation and adaptation, ecosystem services, recreational, aesthetic and physical and mental health benefits in the plan is very thorough and supports findings from our research. Urban trees are shown to increase property values. One study suggest New Zealanders would pay	

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	\$184, or volunteer 4 hours, to save 20% of trees in their local neighbourhood. The detail in the plan about why we need to meet these goals is both comprehensive and convincing.	
	One detail that would strongly support urban reforestation is the support council can offer to support community groups and private landowners. This could come in the form of plant nurseries, consultation advice, tools, maintenance and volunteer co-ordination. There are many community groups involved in restoration projects in Christchurch. It is crucial that they are best supported as to contribute to council's goals in the plan.	
	I would strongly support many of our urban forests to become "urban food forests". With regular food costs and supply disruptions, improving food resilience should be a top priority. I would like to see this in conjunction with more community gardens. Both will promote resilient, local, circular economies, providing economic, social and environmental benefits to communities and families.	
	Predator trapping lines at the university have removed 43 predators from campus. As a volunteer pest trapper, I know many pests are still out there greatly decimating the tree canopy. I would recommend that the maintenance required to protect plantings should include predator trapping and other protections such as plant guards etc. While this is not mentioned in the plan, it is crucial to increasing seedling survival and canopy cover.	
	While increasing tree cover can help mitigate the impacts of climate change, it cannot be a replacement for other climate policy. Trees do not immediately offset the carbon we emit. What can be enacting climate policies that reduce emissions such as those proposed by school strike for climate New Zealand to your council this month. Additionally, our climate is already changing, meaning urban reforestation strategies must be able to cope with saline soils or extreme weather events that will become more frequent in the future.	
	To live up to our name as a garden city, we urgently need to increase our canopy cover via urban native and food forest. To do this, diverse plantings equitably across the city and be well maintained to ensure long term success. It is time to catch up to Wellington's and Auckland's canopy cover and see the garden city grow once again. I strongly believe the plan will get the region to where it needs to be. Overall, I am proud to support.	
50490	Gain community buy-in by planting a whole street/neighborhood in one go. Use community outreach well in advance to inform the neighborhood of the plan for berms/parks/open spaces, and then offer appropriate trees for free or sale for private land in the same area at the same time. Have the efficiency of lots of plantings happing in one area at a time, saving on moving heavy equipment, transporting trees/soil, and windscreen time for council arborists/parks staff. Invite community groups and neighborhood associations to help with planting and make an event of it. Aim for trees that can immediately make an impression (1.5 to 2m + in height), and other neighborhoods will be clamoring to be next! Paramount however is having a large supply of cheap/subsidized "large" transportable trees ready to go. Use vacant, crown and council owned land (Redzone?) as a passive nursery for raising seedlings into juvenile trees that can easily be relocated.	Ryan Jackson
50491	In principle I endorse the plan. -I am particularly concerned about housing intensification. I observe increased hard areas around these housing developments and as a rule no associated tree planting. I would like to see an obligation on developers to retain or replace trees in these developments to assist with stormwater management. -I would also like to see the development of a community fruit/nut forest in Christchurch as a project.	Carolyn Murray
50492	The targets are too low - we should be aiming for 30% by 2070. There needs to be separate targets for each Community Board area, and higher targets in industrial and commercial zones to combat the urban heat island effect. Should be aiming to plant 15,000 trees per year. These should mainly be non-specimen native trees, planted at scale to reduce costs. A separate target should be introduced for volunteer-planted trees on Council land. To support this, we should hire more council rangers and set up a way for businesses, non-profits and community groups to easily connect with each other and organise planting events.	Peter Galbraith
50493	Fully in support urban tree planting	Simon B
	City plan doesn't seem like a very holistic solution.	
	What about grass roofs, moss, wildflowers etc in the greater sense. Rainwater collection (especially by developers).	
	Until the council starts to look holistically and move away from tick box exercises, all these 'movements' create knock on problems, and / or double handling, wasting money.	
50494	Full submission attached.	Ann Kennedy

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50495	I love this, more trees in Christchurch! I would like to see some focus put on tree lined walkways, most of our walking or cycling tracks are very exposed to the elements, currently the	Richard M
	only real option for a shady walk is either Hagley Park or Bottle lake forest. I would like to see some of the tracks like Sumner, Rapaki, little river trail, Te Ara Otakaro etc be tree lined.	
	Potentially even a new walking track through the entirety of the red zones.	
	Where acceptable it would also be great to have fruit bearing trees for community foraging.	
	Appreciate what you are doing looking towards the future,	
50497	I strongly support increasing tree cover in Christchurch. In terms of quality of life, adaptation and mitigation of climate change, and as a conservation measure it is a central	Isaac Freeman
	responsibility of the City Council.	
	Luculd prefer to conplexing directed strengly towards pative trace, with new systic plantings only in rare space where particular reasons can be articulated. While there may be	
	ases for some exotic trees as food forests, or for particular cultural connections such as the Sister City gardens in Halswell, we should normally expect 'right tree, right location' to	
	mean trees native to the Christchurch area. This should be integrated with other initiatives to protect and restore other kinds of native biodiversity: restoring populations of other	
	native plants, fungi, birds, reptiles, fish and invertebrates as well as trees.	
	I find the current plan vague on the question of native versus exotic planting, and I believe the City Council should take a strong position in favour of native species. Citizens are free to	
	plant exotics in their own gardens, but the Council has a particular responsibility to plant natives.	
	the city are prioritised, as people in these areas are less likely to have the means to plant trees on private property. The participation and support of the Council is needed more	
	strongly in poorer areas.	
50500	I strongly support all aspects of this Ōtautahi Christchurch Urban Forest Plan, especially the plan to plant more street trees.	Jono de Wit
	In recent years, the council has cut down many large trees when doing road layout changes such as on Riccarton Road and on Buckleys Road outside Eastgate. They also proposed	
	cutting down all of the trees on Bishopdale roundabout for the wheels to wings cycleway, this was only changed after strong public disgust. The council should do much more to plan	
	street changes around existing trees to avoid cutting them down.	
	There are so many roads in Christchurch that are significantly wider than they need to be (e.g., Bletsoe Ave). Street trees can be difficult to find room for, but streets like these could	
	be narrowed and a lot of room made for trees - similar to the layout on Dacre St in Linwood or Wainui St in Riccarton. Narrow streets make people drive slower and safer and make	
	more space for pedestrians.	
	Old light industrial areas like these in Phillingtown and Sydenham are devoid of street trees and trees on private preparity. With Sydenham likely changing to mixed use a buge street	
	planting effort should be started in this area	
50502	I generally support the intention of the plan and if achieved, it will be a huge improvement on the current situation. I would like to see the average canopy goal extended to 25%.	Marie Gray
		5
	Some specific comments:	
	* expectations of developers and financial contributions are an effective way to protect our existing trees and plant new trees. This should be increased to 25% - with any shortfall in	
	tree coverage requiring a financial contribution to enable the council to plant trees in nearby parks.	
	* The current policy of planting 2 trees for every one removed is not ambitious enough. Trees take years to grow. If we think about the ecosystem services that mature trees provide, it	
	should probably be 10 trees for every one removed! I acknowledge this level of increase may be too much of a step but what about 3 trees or 4 trees?	
	* when we talk about urban forests, we shouldn't just focus on trees. We need protection and enhancement of native ecosystems i.e., wetlands, shrublands and forests. The big trees	
	are critical but so is the understory too.	
	* the Port Hills and Lyttelton Harbour provide opportunities for large-scale ecological restoration - we should be planting the gullies of the Port Hills as soon as possible. Gully	
	restoration would have numerous benefits around biodiversity, carbon, waterway quality, erosion and sediment recreation, making kai and improving our resilience to heavy rain	
	events - which are going to become worse and more frequent as our climate warms.	
	* the Ōpawaho and Ōtakaro rivers also provide huge opportunities for large-scale ecological restoration.	

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	* In urban spaces, yes we need individual trees but we also need green corridors, mini forests and large forests to provide habitat for native fauna. We should do as much as everywhere.
	* the focus should be on native planting in public places such as parks, reserves and streets. Where exotic trees are planted, there should be a good reason e.g., fruit trees in community gardens to improve food resilience or heritage/friendship gardens. Exotic trees should not be the default and careful thought needs to be given to any uninten consequences in terms of biodiversity and storm water management.
	* there should be a special plan around pest species - pest trees should be able to be removed when they pose a threat to biodiversity values, and we should avoid planting in the future.
	* we don't always need to plant trees to see benefits. Where there is an existing seed source, we just need to fence off an area from stock and nature will do its thing - this is true in Banks Peninsula and parts of Lyttelton Harbour. Banks Peninsula provides a massive opportunity for large-scale restoration and there needs to be funding for thing fencing, pest control and weed control.
	* I am pleased to see a focus on equity and would like to see 20% as a minimum in each area instead. I live in Wigram and there is very low canopy in my area and most of the parks are grass. I personally think that the council should do away with most grass parks unless there is a very good reason to have grass like a sports field. Think creatively example, our local children's playground (De Lange Reserve) could be made into a nature space instead of a playground sitting in the middle of a grass field. Provide paths walking, leave some of the park as a grass field for kids for playing and put the rest into bush. Native birds do not come to grass fields and nature spaces are really fun for kids
	* there are so many places we could plant more native plants and many volunteers keen too. The Council parks team needs to be properly resourced so they can meet the out there. If councils provide the supporting staff, expertise, trees and equipment, volunteers will do much of the work on the ground. It is a win-win for everyone.
	* I think the stormwater basins are under-utilised as places for mini or large forests. I live close to the Awatea Road stormwater basins, they have been very helpful with this flooding but again mainly grass! We could plant wetland species and more trees while ensuring it remains a stormwater basin and a recreational space for the community.
	* I like the focus on treating trees as essential infrastructure.
	* Overall I support the plan with the comments above, but the most important thing is the Council needs to resource the plan when it comes to the long term and annual pl Council has lots of good plans that sit on the shelf.
50507	I support this plan, it gives me confidence that this is being pursued by our city council.
	It will help a lot towards mitigating some of the impacts of climate change, as well as making our biodiversity more resilient. Yes please, I support.
50509	I am lucky to live close to Rising home, Hansen's park and the Heathcote River and enjoy the large trees in these areas. We are now starting to get a bit more bird life ie Piwa Koirimako little owls king fishers on our doorsteps.
	However I have seen the increasing greed of local developers who when building rip out every tree and bush on the section. There needs to be a way to prevent this as with previous resource management act.
	We need to keep the green spaces with trees and indeed create more tree planting for the planet and our own mental health.
50511	I think this plan is a good idea, but the canopy cover targets for 2030 should be set higher. I think the residential target should be 30%.
50512	The plan should do more to acknowledge that, as trees compete for space with other things we need in the city, increasing canopy cover goes hand-in-hand with increasing density and reducing car-dependency.
	The roads and parking spaces necessary to support large number of car trips take up a very large amount of space, much more than would be required to transport the sam of people by public transport, cycling, or walking. Suburbs of low-density housing also take up more total floor space to house the same number of people, as well as reinfor dependency by pushing housing further away from amenities and public transport hubs, forcing even more space to be devoted to roads.

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ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)	Name
	Denser housing, more public transport, and fewer cars, roads, and car parks frees up more space for trees and will make it easier to achieve higher levels of canopy cover.	
	Protecting mature trees is important. But we should take care that a very small number of mature trees are not used as a reason to prevent redevelopment of low-density housing	
50540	that would enable even greater numbers of mature trees in the future.	
50518	Decent plan, but a few comments.	Finn Jackson
	First off: I support the Ōpāwaho Heathcote River Network's submission in full, particularly their points around planting on the Port Hills.	
	I'd also like to see:	
	1. The overall targets increased to 30% tree canopy cover by 2070 (or earlier), with separate targets for each Community Board area and higher targets for cover in industrial and commercial areas. People spend large parts of their days here, and particularly in industrial jobs which are highly physical, may be exposed to a lot of heat if there aren't enough trees in the area.	
	2. Council should be aiming to plant more than the proposed 8,000 trees per year - maybe more like 15,000. These should ideally be non-specimen native trees, planted at scale to reduce costs.	
	3. A separate target should be introduced for volunteer-planted trees on Council land. To support this, Council should hire more community rangers (funded out of opex rather than the capital endowment fund) and set up a mechanism for businesses, nonprofits and community groups to easily connect with each other and organise planting events, without putting pressure on Council's resources.	
	4. We need to look into ways to enable and incentivise relocation of existing trees, where keeping them in their current location isn't feasible. If we can't keep them where they are, the next best thing is keeping them alive somewhere else!	
50510	Thanks for all the work staff and elected members have done on this. It's a step forwards!	
50519	Please see our Urban Tree Draft Plan response in the box below "supporting documents."	Paul and Fay McOscar
50520	my children, but they are slow cyclists and it's not pleasant at all in such a hard urban landscape. My suggestion is to increase your cycleways and the canopy together with them to make cycling an increasingly preferable option.	Justine vandenberg
50521	I am all for this plan. Generally, the hill suburbs have a better forest canopy than the low-lying areas of the city but there are many opportunities for improved forest cover in the red- zoned pockets around the hills. Some of these zones are likely safe enough for community groups to be involved in planting them out & maintaining them until the forest cover is	Jocelyn Papprill
	established. It is important to recognise that low-income communities may not be able to support planting projects or partnership projects as readily as middle to high income areas	
	so council must ensure funding is equitable i.e. discuss ideas with the communities but be prepared to subsidize paid support in low-income areas to ensure planting happens and	
	Work closely with established community restoration groups and residents' associations right from the start to get their buy in.	
	I'm not sure what 4.4"Celebrate different cultures through our trees" when we primarily need to establish environmentally appropriate trees & enhance native biodiversity. I have	
	nothing against Japanese Cherry trees but much of the re-establishment of the forest canopy should reflect historical biodiversity. Prioritise the ecological corridor aspect.	
50522	Would love more greening of Selwyn st and Antigua st as they lead into the city and Hagley Park. Walking and biking from Addington is hot and bright as there's no protection along	Rachael Green
50505	these streets. Antigua has a great cycle way. Both these sts are residential as well as commercial.	
50525	I support fundamentally support the Plan.	Hayley Guglietta
	1. Stronger incentives for developers and private landowners to retain existing trees	
	2. A stronger connection with the MOE and schools to include them in this plan	
	3. Not just make Green Infrastructure level with other infrastructure prioritise it	
	4. A stronger focus on mahinga kai incorporating Fruit trees in every public space would be a good start	
	5. Genuine collaboration with community groups already working in this space	
	6. The residential Red Zone is a massive opportunity to contribute to an increase canopy cover.	
50526	I've read through the plan and watched the webinar. All looks great and I encourage you to keep moving this forward.	Maureen McCloy

 Could you please consider: The links between this plan to the Council's other complementary plans. How to ensure all these plans are actually implemented. How inks between this plan to the Council's other complementary plans. How to ensure all these plans are actually implemented. How is the Council actually going to reverse the current three cover decline? Chainsaws don't care about plans. Remember Banks Peninsula. It was significantly deforested in colonal times and has different needs to the unsure this plan has a long-term commitment from Council. Threes grow in the long-term and are indeed critical infrastructure. Wy concern is that future Councils: 6. How to support natural regeneration of native forests and not just planting of natives. This supports biodiversity restoration and develops an ecosystem. This again requit term view. How to support natural regeneration of native forests and not just planting of natives. This supports biodiversity restoration and develops an ecosystem. This again requit term view. How to keep a strong focus on engagement and education. If people understand the vision and care about 1, then they might just support 1 in the long term. Jam very pleased to see this plan, as Christchurch is in dire need of more trees and natural bush. Too many of Christchurch's "parks" are merely grass areas with a few decint rees scattered around - even in new subdivisions where we should see benter. How very. I think the targets are far too modest. We should be alming for higher percentages and at a much faster rate than 2010. I would like to see more natural areas with both native trees comptrate long for redevelopment. This is critinana, how do we stop this Government Department from talking this. Clucating these developments nature trees and tarial bushas aconset tore plan durit	ID	Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?)
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	and consistently stay the course for fifty years ahead in the fight for trees. Other past programmes have been started and faded out of action. Different staff and elected members on	
	the Council have introduced totally opposite programmes in the history of desire for a green city. In my own case, we have a large property where a number of mature trees have	
	grown over a hundred years. They were on a notifiable tree list, which gave them a degree of protection. However, a new head of department arrived and suddenly nearly all of them	
	were removed from the list. Thad to fight to have a beautiful driveway reinstalled. The driveway planted in 1934 must irritate the seven adjacent property owners with their shading	
	and leaf droppings – but only one neighbour consistently wants to cut down a blue spruce. So far, ne has only chopped away at one side over his fence. But this is an example of now hard it has been to protoct trees.	
	hard it has been to protect trees.	
	I have seen particularly over the past forty years a consistent loss of mature trees to infill and development. What to one person is a beautiful part of their property and scenery, to another is attacked to extinction by a determined resident. Even programmes to encourage new planting to replace lost trees have failed.	
	In order to get the whole city behind a tree protection programme we have to change the mind set of many citizens to where the vast majority take enormous pride in the 'tree umbrella' crossing above the city. To each and every one adopting a constructive mind set, which says they will protect trees toward the overreaching advantage of what is an otherwise flat dull city towards being an environment of great beauty celebrated by the citizens as part of their positive, healthy and happy living. Everyone from the start and into the long-term future to get behind the Council proposal and work with them and have eventual pride in the result of their care.	
	Something that I find truly worrying is all around the outskirts of the present city urban areas are a number of very closely built residential developments. No space has been provided for small development community gardens and trees; no large trees will realistically grow between the houses so the developers are creating prison like slums for the future with no human context within them. When I discuss this with people some say to me "well, not everyone wants to cope with the tree situation", but the result is barren housing developments with little seasonal or intimate beauty in the whole area. Surely this cannot give a hopeful future for the overall future environment of these areas, but such developments continue to get Council permission without the improving of requirements.	
	In closure, it will be constructive to get all citizens to take protection of the trees growing in their area and for all citizens to consider trees as critical to the city's environment. For the City Council to promote this feature into the very spirit of the city.	
50536	I am concerned this plan places too much continued emphasis on maintaining the results of the sustained efforts of European colonisers in replacing native species with exotics. The words "maintaining the large deciduous landscape that Ōtautahi Christchurch is known for" appear to me to fail to adequately recognise the fact that this is an artificial environment and that these trees do not support native species. It does not adequately recognise that this was the vibrant home of native flora and fauna which were intentionally displaced at a large scale. It lacks an uncompromising vision of restoring Ōtautahi Christchurch as a uniquely New Zealand city which actively supports our native species.	Josh Brown
	I believe the interpretation of "right location, right tree, or right function" should always consider native species first and foremost as being right, even if this means the character of the city is changed. To support the logic in this statement, consider which European city has any numbers of New Zealand trees which provide a habitat for New Zealand native birds. I suggest there are no cities outside New Zealand, and therefore native trees should almost always be the right trees in their home Ōtautahi. The reality is that historically they have been ruthlessly and thoughtlessly displaced from their home and we have an opportunity to have a vision to determinedly address the imbalance and mistakes of the past.	
	I live directly adjacent to Hagley Park in the city. Hagley Park, the largest park in Christchurch, is essentially 407 acres of exotic species, and of course I understand some exotics have a place for functional purposes. However, we only see Sparrows, Blackbirds, and Thrushes in our garden every day, and the only native species we see is the occasional Pīwakawaka, and a very rare Kererū. Is that the natural or right way it should be in Christchurch? I was also left wondering why the plan shows a disproportionate number of images of native plantings and native birds rather than images of the far more predominant exotic species. I believe this subliminally misrepresents the reality of living in Christchurch and supports a satisfying narrative which is not at all justified.	
	Specifically, it appears to me this plan will continue to support recent plantings of deciduous English Willow trees along the Avon by Park Terrace. This will be justified as being part of	
50507	the "character" of Christchurch. I say who's is that character, and at what species cost, will that be maintained? I know our lonely Kererū would have far preferred Kowhai	
50537	See attachment.	Rae James
50543	It's really great to near that the Unristenurch City Council wants to plants some more trees in the Garden City	Jan Halliday
50547	But unfortunately the problem is they don't actually maintain the ones that they already have. Different suburbs are treated differently to others.	Eav Brorops
50547	Targets All the benefits shown in the nictorial are of high value and urgently required. Our city will be a nicer place to spend time when we have a variety of trees and babitats for	
	insects and birds. This plan offers opportunities for people to be good ancestors: to work towards a brighter future. A future where we feel more connected to the natural	
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environment, where we experience the all the positive, health giving benefits that accompany urban forests. Working together across our city will be beneficial - we ned ways to connect that value place and guardinaship possibilities. And six we achieve our goals - as we have with the city rebuilding, cycleways, flood water etx we will feel more empowered and determined to be even better ancestors. Those who come after the decision makers of today deserve this. 50550 50510 50510 50510 50510 50510 50510 5051 5051 505 50 50 50 50 50 50 50 50 50 50 50 50
connect that value place and guardianship possibilities. And as we achieve our goals - as we have with the dirperivative place and guardianship possibilities. And as we achieve our goals - as we have with the deserve this. Docide 50549 Why have the council planted acom trees. They drop their leaves and the acoms on the asphalt footpath are at a danger for older population. These trees are a menace, they make so much mess in autumn and we only get clean up (2) times a year. Please plant trees but trees that are easy maintenance Dodd Dodd 50550 For my submission I would like you to refer to Opäwaho Heathcote River Network Inc. 's submission as my own submission as I agree with everything they have said. Sara Campbell 0 påwaho Heathcote River Network Inc. submission here: https://drive.google.com/file/d1/Qws84ywpnDYCH8LHIPTb228HyopydKf/view?usp=drivesdk I also agree with the following points made by Ashley Campbell: Sara Cambbell 1 I.GENUINELY PRIORITISE GREEN INFRACTRUCTURE It's one thing to say the plan priorifites green infrastructure, it's another thing to do so. For example, on page 5 the plan states "mature tree roots can damage nearby infrastructure such as footpaths and underground pipes can damage mature tree roots and trees, so we should avoid this through tree-friendly design. Obviously, this is less easily done when talking about existing pipes and footpaths, but even then, it is entirely possible, when they need repairing, to replace footpaths in a way that accommodates existing tree such as the first priority, and plan around that. Let's ensure that, wherever possible, when they need repairing, to replace footpaths in a way that accommodates existing in pase as the first pri
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Restoration planting clearly requires that only locally endemic trees are planted, but I see no need or reason to apply this to street and park plantings. For example, the pohutukawa
I think much of the "boring natives" narrative happens because of the limited number of species that are planted 1'd like to see more use of our ornamental natives, some of which
are endemic to this area but seem seldom planted on public land. Kowhai is popular, but what about mass plantings of lacebark and ribbonwood? Mānuka and kānuka? Or even
Carmichaelia stevensonii or Kõtukutuku? This plan presents a great opportunity to shift perceptions about native trees being boring
4. ENCOURAGE RETENTION OF EXISTING TREES
I'm glad to see the plan includes incentivising developers to not just plant trees in their developments, but also to retain existing trees. Given that we get most benefit from mature
trees, it's essential that there's a real incentive to retain what we already have. Fairly clearly, this must be a significant financial incentive.
But why just developers? What about householders? I don't agree with compelling private landowners to retain trees they don't want, but I do believe a strong financial incentive to

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	retain those trees could be very effective. I'd like to see this plan include rates rebate on properties that have mature trees big enough to be counted in the urban forest. This would recognise the fact that trees on private property benefit the entire city and would go some way to making large trees on private properties desirable.	
	After the events of the past month in Te Ika-a-Māui, the need to live more sustainably on this land has never been clearer. Our urban forest plan is a major part of this city being sustainable. I commend those who have put this together but ask them to go even further. Future residents will thank us for it.	
50554	Thanks for the opportunity to comment on the plan; I have several questions/queries/ comments;	Jason Hall
	1. I support the plan for additional trees on public land across the city	
	2. Does this plan only relate to trees on public land?	
	3. What is the plan for protected status trees on private land?	
	4. For trees on private land, who is expected to cover the upkeep / maintenance costs associated with the new or existing protected trees?	
	5. Will the protected status of trees on private land be reviewed?	
	6. If not, why not?	
	7. For existing protected status trees on private land, can they be removed if they pose a serious threat to the safety of property or people?	
	8. How close can a tree be planted to a property and property boundary?	
	9. Why is a copper beech tree classed as a heritage tree?	
	10. What type of tree do you want to encourage in the city, is copper beech included?	
50557	We need the canapy of trees to either be increased or kept at same level. Definitely not decreasing the trees, our trees are important for climate change, shade,	Kathy Burrows
50558	I am a resident of Sockburn, which has one of the least amounts of mature tree cover in Christchurch. I studied ecology and, as a result of my education, work in the plant restoration industry. I am very happy to see a 50-year tree cover plan for Christchurch. Myself and my partner recently re-morgaged our property to purchase our neighbour's land, who had spent his life growing a range of slow-growing native trees such as Miro and Matai in his backyard, only to end up in hospital with dementia and the house going to public trust. We listened to prospectors visit the land while it was up for sale and discuss how many houses they could fit on the land - and heard how they saw nothing of value already present. We hold the values recognised by this plan as critical for communities to have in order to achieve the success of this plan, yet our values mattered little when it came to competing with developers at auction when densification offers so much more financial ability.	Davena Watkin
	Therefore having a plan for education of the public will do very little if it is not also recognised that some financial aid or incentive is also required for those values to manifest at an individual level.	
	I think it is no mistake that these poorer areas are the ones with least tree cover. My experience as a student living in sub-standard housing is that it is cheaper to chop down a tree and let more light in than it is to renovate a house to be healthier, and I do not see the plan clearly acknowledge this link, which again relates to financial ability.	
	Therefore one area I think is lacking from this plan is a clear path forward for addressing the financial inequalities that promise to delay or hamper the success of this plan, and a lack of solutions aimed at swaying individual action. I would like to see financial incentives such as a reduction in rates for households with trees in areas recognised as critical for tree cover, and/or a pool of money available as aid for households that want to preserve the trees in their community, as part of the investment in a community-centric programme.	
	I also feel that the full implications of needing to have a range of ages of trees across the urban landscape was not as overstated as it should be in the context of the understanding of climate change captured in this plan. The plan acknowledged more and more stressors that trees will be under the further into this 50 year plan we head, but I did not see suggested actions to be a reflection of the logical conclusions of these understandings, namely:	

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	- that trees planted from now onwards under this plan meant for providing critical infrastructure through maturity will have a harder and harder time reaching maturity as the plan goes forward due to climate stressors;	
	- therefore that maturity under climate change can no longer be guaranteed for trees planted as replacements for mature trees chopped down per current council rules, so cannot be seen as adequate/equal infrastructural replacement for already-mature tree loss;	
	- That we will be seeing a loss of mature canopy cover regardless of this plan due to the cumulative effects of the climate stressors and climate events acknowledged by the plan;	
	Yet the plan acknowledges the critical role of already-mature trees in mitigating current extremes of climate and the intention for them to continue to do so in the future. In light of the above, we cannot expect our mature trees to do this unaided. Therefore, a clear plan for the protection of current mature trees is critical to the ongoing success of this whole 50-year plan, which is lacking under the current suggested actions.	
	As it currently stands, the cost of chopping down a mature tree does not reflect the cost of loss of the mature canopy. Nurseries price their plants to the age of the plants they are selling. The older a plant in a nursery, the more valuable it is. What nurseries cannot do is price plants according to the value of the plant it is going to replace, which means that planting two replacements for a mature tree (per current requirements) for development will always be the cheaper option than retaining that tree. Because nurseries cannot sell trees the age and size of the already mature canopy around Christchurch, this effectively causes the market value for all mature trees to be equal to a sapling or two. Which is clearly false, and will never match the infrastructural cost of the loss of already mature trees given all of the above over the 50 years of the plan, nor capture the critical timeframe we currently have for mitigation.	
	The only way to address this imbalance is to provide financial incentive for retaining current tree cover, such as heavier penalties that reflect the actual financial loss of 50-years' worth of tree-cover loss, and to recognise the market value of mature trees which is currently unrecognised by nature of their already-planted status. I would suggest that developers are required to purchase mature trees at their actual market value separate to the land purchases that they wish to develop, and that this money go towards a pool of financial aid for communities. Furthermore, native canopy trees (the podocarps) take on average 60 years to reach reproductive maturity, which is an even longer timeframe than this plan covers, and some native plants do better in the urban environment than they do in the wild, so are more at risk than others of local extinction if urban canopy loss continues, which it will continue to do if the aforementioned issues are not addressed. Therefore, alongside consideration of these issues, I would also like to recommend that the loss of native trees should incur higher penalties and have higher purchase rates, as a reflection of their greater infrastructural, cultural and biodiversity values.	
50559	Mental health issues are now known to have significant impacts on a healthy society. Cutting down mature trees and spoiling the character of neighbourhoods brings despair to those who have appreciated and nurtured them over decades. This should be taken into consideration when permission is granted for intensive suburban housing. The actual cost can be massive.	Sue Bridges
	I have many other concerns but trust they will be brought up by others. I have only just seen about this submission and have no time to add more. This was not well-publicised, but it will be of loing-term impact to many.	
50566	I endorse denser tree planting across the city. However, denser planting should NOT be used as an impediment to denser housing. This can be achieved by having more, and/or larger parks where trees will flourish. Larger urban fringe housing developments, such as Sparks Road, etc need to have plenty of park space and trees factored in (at the developers cost), but CCC need to retain approval over the number and types of trees planted to ensure best practice.	Oliver Mould
	The ratio of garden space to housing footprint needs to be adjusted slightly, so larger, more productive gardens can be had as well as denser housing. For instance, on an urban centre plot that has six houses on it now, should probably only have four with larger gardens, which in turn must have restricted pavement areas so that at least 60% of the garden area is planted. Trees are not an essential urban garden requirement due to the reasons you state of potential damage to adjacent infrastructure and property.	
50568	I agree that we need to increase the tree cover in Christchurch. But also important is looking after the trees after they have been planted. I have seen young trees planted in our area that do not get watered or weeded and many have died the year or second year after planting due to lack of water or being smothered by weeds.	Jane Hopkins
	Also, please stop allowing developers to chop down mature trees when they build on a section. They can keep the mature trees and build around them.	
	And you could incentivise residents to plant trees in their sections by giving out vouchers for native trees with rates bills (perhaps from Trees for Canterbury or similar)	

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50570	*Right location, right tree, right function*	Nicky Taylor
	Working together We collectively manage the urban forest on both public and private land to improve environmental, economic, social and cultural benefits.	
	Thank you for the opportunity to comment on this plan. We have several questions/queries and comments to make:	
	1. We support the plan for additional trees on public land across the city.	
	2. Does this plan only relate to trees on public land?	
	3. What is the plan for protected and/or status trees on private land?	
	4. For trees on private land and for those trees that are protected or of heritage status - who is expected to cover the assessment and maintenance costs associated with these new or existing protected trees? We believe it should be the council.	
	5. We would expect the protected status of trees on private land to be reviewed and adapted - to acknowledge increasing weather events and climate change - as seen recently in the North Island. This is a potential health & safety/risk issue.	
	6. For existing protected status trees on private land. These should have a clause to allow for removal if they pose a threat to the safety of people/property and the landowners enjoyment of their property - at no cost to the landowner.	
	7. Why should a copper beech tree be classed as a protected or heritage tree? This is not a native tree to NZ and given the council emphasis is for planting natives. We believe the opportunity to replace these trees with natives should be provided for in any change to the urban plans.	
	8. We believe that the council plan should be focused on planting native trees to regenerate native tree cover that has been lost as the city has been developed. Therefore, as stated above there should be a provision in the plan for exotic trees (including protected trees) to be replaced with natives that are at a size that will not cause potential health and safety risks.	
50572	Re: Objective 1.4 : Need to identify surplus CCC land on Banks Peninsula (i.e. Road Reserve) that would be suitable for planting in native species. Then develop a mechanism that would allow community groups to develop these areas in conjunction with CCC.	Matthew Brosnahan
	Re: Objective 4.2: Develop a partnership with power utilities so that the right trees are growing under and near power lines (trees that grow to the right maximum height/low fire risk) to move away from the continuous tree topping/responding to storm damage. Done properly this would reduce cost and improve resilience.	
50573	In my experience, there is very poor maintenance of the existing vegetation within the city. The planting along the footpaths and recently built cycleways is too close to the pavement and the planting is damaging the asset as well as making it dangerous for users (I can provide many examples). This relates to recent planting as well as more established ones. I doubt that the new approach to planting will be much different to the current practice. It takes a long time to get things resolved after notifying the council of issues with overgrown vegetation with the current (lower) level of planting. I'm worried things will get much worse and more dangerous once more vegetation is planted close to the corridors.	Peter Menis
	There are only a few very hot days a year in Christchurch and shade is generally not required. Conversely, it is beneficial having the sun shining on the houses during most of the year, keeping them warm and dry (rather than damp and cold).	
	Christchurch experiences some strong winds, and these are to become more common later in the century. Large trees already present a danger when walking outside, enjoying the outdoors. The outdoor activities within the city will therefore become more dangerous and will lead to tragedies.	
	There are many examples of root systems of larger plants damaging the pavement or underground infrastructure. With more large plants within the city limits, this will inevitably lead to more damage to the infrastructure or loss of comfort to users, less safe (uneven pavement).	
	The repeated maintenance of the infrastructure, leaf collection and the pruning of the vegetation will require a significant increase in operating spending. In addition, these activities will generate more carbon, diminishing the benefits of urban trees.	

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	As an alternative, there is plenty of marginal land within the city limits (red zone, Port Hills) where many of the negative factors of the large plants would not cause an issue and	
	maintenance of the plants does not need to be as intense.	
50574	The proposed Urban Forest plan appears to be an excellent plan as far as it goes. It needs to go a lot further. It needs to be far more ambitious in the percentage of tree cover it seeks to achieve over time (and I am aware that may not be easily achieved in the built- up urban environment and the current political environment).	Gordon Hamblyn
	The most significant omission is any mention of edible species other than Mahinga Kai. Just as Mahinga Kai are a valuable resource for Maori so are exotic edibles a valuable resource for other cultures. Especially if the plantings are of a wide range of culture's edible species not just the 'normal' European edibles.	
	The benefits of edible species are the same as of other tree species with the extra added benefit that they also provide food for long periods of the year.	
	Plums for instance fruit from mid-December through to early-April depending on the variety planted; and apples have an even longer harvest seaon.	
	Edibles also increase food security and thus community resilience during emergencies that disrupt food supplies; eg earthquakes and floods.	
	The great majority of edibles also flower beautifully adding significantly to the aesthetic value of the canopy cover while also providing food for bees and other pollinating insects.	
	For these reasons edibles should be given the same status as indigenous, exotic and mahinga kai in the CCC's plans for increasing canopy cover with an urban forest.	
	Ps: at the sub-canopy level there are also plenty of opportunities to plant edible shrubbery.	
50575	I am a born and bred Christchurch person and a lover of the natural environment, specifically trees, and even more specifically, large exotic tree whose shade and shape are so pleasing throughout the city. We actually need trees, especially in the city environment. Trees cool the city streets, and we need a lot more of them. I'm reading that the council are aiming for 2075!!! as their goal to be a tree City. Far far too far away. We need trees NOW, and lots of them. I shudder when I see an old home with a For Sale sign, only to see, several weeks later, a developers sign, the home gone, and even y lovingly planted and tended tree gone too. Gonel With the council's approval. I challenge the council, to take seriously the lack of protection in the current consent rules, and to put in place protection for existing established trees which need your protection. Are you aware how long it takes for a tree to come to maturity - different trees, different times, but on average it would be 50 to 70 years. It's a heartbreaking thing to see a mature tree, which has given shade, shelter to various birds and insects, lying, felled upon the ground. You may laugh to yourself when I say, I feel a physical pain in my heart when I see that sad sight and know that it is happening all over the city. Some of the local developers doing this clear felling need a wake-up! Global warming, which we have seen first-hand in the North Island is here. Now. We cannot pretend any more. To cut down existing trees, which offer so much to both the environment (C0.2) and the aesthetic of our city is a crime. It's all very well to say, we will achieve some far away goal (2075!!) but, here and now is when you councillors need to act. One of the local developers in the city are preserving trees on their sites. I've made a special effort to drive by some completed builds, and have been really happy to see trees, large and happily still in place, with developments tailored around them. Something that must be a requirement for all people who are thinkin	Sandra Shaw
50576	Good to see the council is finally thinking about doing something to increase our canopy cover, however I hope it's not going to take years to put the plan into action as it needs to be started now.	Debra Orange
	For years the land in and around the city has had its established tree canopy destroyed by greedy developers and councils that don't seem to care about the environment.	
	Part of my street had all the hedges and trees taken out to build a noise retention fence along their boundaries as mitigation for a business to be established in the area. The area was stripped of all trees and vegetation and is now a very large, sealed area. It is surrounded by planted bunds but it will be years before the plants are established that is if they ever do get established as they don't seem to be doing very well so far.	
	I wanted to plant on the outside of my fence, where there was once a hedge and was told I couldn't plant on council land.	
	I feel part of the consent process for developers should include the planting of trees along the newly developed streets and land areas set aside in these new subdivisions for the	

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	planting of trees/woodlands. This should be happening in all subdivisions now.	
	I have watched the land in new subdivisions be totally destroyed by the developers. All old established trees and vegetation have been completely removed and good quality soil removed from the land. Removing all the trees, leaves existing homes in these areas with no shelter from the wind and it also affects the noise levels. What happens to all the wild life and birds as their habitat is totally destroyed?	
	The damage done already over the last 20 years or more is going to take at least another 20 years or more to re-establish a reasonable tree canopy.	
	I think the "Targeted canopy cover by 2030" really needs to be a higher percentage for all "Land use types" as so much has been destroyed already.	
	It is absolutely disgraceful how the tree canopy, land and environment has been destroyed by developing the land for housing and industry.	
	Developers and commercial/industrial areas need to be held accountable and have respect for the land and the environment. Surely there is room in these subdivisions and commercial/industrial areas for a tree canopy. This decision needs to be made sooner rather than later!	
50577	I support the plan overall. I particularly value having more trees for the following benefits:	Francis Johnson
	(1) reducing 'heat islands' – something that will become increasing important as climate change intensifies;	
	(2) regulating water flows in the event of heavy rainfall events, which will also become increasing important as climate change intensifies;	
	(3) providing mental health benefits, including from absorption of noise;	
	(4) increasing biodiversity within the city;	
	(5) providing a carbon sink, both within the trees and their roots, but also indirectly through by providing shelter for other plants.	
	Some things I would like to see added:	
	(1) I am in favour of practical support, financial incentives, and regulations aimed at having more trees on private property. In particular, I would be in favour of the Council providing rates rebates for property owners with suitable trees, especially in areas with low tree coverage. However, I would want this to be done in a way that didn't result in a higher proportion of the rates burden falling on lower-income households.	
	(2) I would like to see targets for Streets higher than those on page 17, for the benefit of the greater number of people who will need to be travelling by active transport in response to climate change.	
	(3) I would like to see more food-producing trees (i.e. fruit and nut trees) in public spaces.	
	(4) I would welcome more streets with very high tree cover, similar to Fisher Avenue in Beckenham.	
50578	Excellent work from staff to produce the Urban Forest Plan. It is clear a lot of research has gone into this, especially with understanding our current inventory, the inventory we need,	Allan Taunt
	and how to get there.	
	bave just a few points. I know they are covered but just want to emphasise them a little more	
	1.) Education and engagement. It's really important the public understand the value of tree canopy (e.g., images like the reduced temperatures on tree lined streets). But also, other	
	things like the value of creating an ecosystem (wildlife, plants, insects, etc. all working together). On that note, I feel a milestone would be seeing native birds in local urban forests.	
	Imagine a time when we see a photo shared on the local community pages - wouldn't that be wonderful!	

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	I think if people see the value in their neighbourhood, then they will appreciate trees on their private property. This would lead to more planting on their sections and reduced felling of trees (potentially going for pruning and maintaining tree health instead). Homeowners could be helped with knowing what to plant where.	
	At school, environmental education could have a local aspect. Students could study the different environments, why various decisions were made, learn about the different trees, all the benefits, etc.	
	2.) How far from a mini forest? People should be able to step out their door and be within a few minutes of walking away from a grouping of trees. By grouping, I mean a place where people could sit and relax surrounded by nature. For me places like Papanui Bush and Cranford Basin have so much potential to deliver that (appreciate the work done by volunteers alongside Council Staff on these to date). These types of environments have the potential to deliver ecosystems. More of these mini forests please - there is potential for sections of parks to be planted in trees.	
	3.) The cooler street environment is something we need to progress. This makes it more present for walking or biking, which encourages people to choose active transport over running a motor vehicle. Either tree lined streets or boulevards with trees down the centre. This of course depends on underground services. A further benefit is tree lined streets or boulevards encourage people to travel at safer speeds. Let's make it happen people.	
50581	See attached .pdf	Joanna Gould
50591	I am thinking about the inequitable cover in the Hornby/Sockburn area and how this could be fixed quickly. It would be so easy to plant up a large number of trees in the middle strip on Main South Road from the Sockburn overbridge to Hornby Mall. Also, I see it would be no problem to	Peter Scholes
	plant some trees in the Brynley, Main South and Tower street roundabout and over the road at Countdown supermarket.	
	Taiso see that Faast Fit Battery 297 Main South Road have no trees out front as per their consent, please look into.	
	Gavins Road being so wide and not very long it would be so easy to plant up without not much cost of inconveniences to people living there.	
	I think the Council should prioritise the Hornby/Sockburn area, because it would be quick and economic to do.	
50614	Here are my thoughts/submission on the urban forest plan, attached as a PDF.	Kari Hunter
50702	I have attached my written submission for this.	Julie Tobbell

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50703	Firstly, thank you for everything that you, Andrew, and organisations like Conservation Volunteers, Sustainable Coastlines, Trees that Count and other organisations are doing. I and many others greatly appreciate your efforts.	Sidney Hugo Weil
	I have lived in Halswell for twenty-seven years and am deeply saddened by the very rapid destruction of our formerly semi-rural environment. A case in point is the Kennedy's Green development, where almost two hundred mature (25 to 35 metre high) gum trees were removed within a very short period of time. Many of these trees, representing many, many years (probably in excess of 50) of life and growth, were removed literally in minutes. To date, there has been no sign of any trees being planted by the developer to replace the trees removed. I estimate that in order to replace the massive carbon sink destroyed, the developer should plant at least 25,000 - possibly many more - small trees. If the felled trees are replaced on a one-for-one basis by small (preferably native) trees, this will not nearly replenish the significant carbon sink lost - at least not in the foreseeable future.	
	Two issues arise from this wholesale destruction of mature trees. The first is that of the definition of protected trees. Having spoken with the then city councillor for this area about how it was possible that the trees were allowed to be removed, I was advised that as the trees were not protected, any consent application could not be denied. This leads to my first recommendation, namely that relevant regulations and bylaws be revisited and reexamined with a view to protecting more trees, including non-native species. The definition of protected trees needs to be reformulated urgently, to include non-native trees and to incorporate their age and size into the definition. It seems to me unforgiveable that, given our rapidly diminishing tree canopy, mature trees, even if they are not natives, can be removed with impunity.	
	The second issue relates to the replacement of destroyed trees. I recommend, as a matter of urgency, that the replacement policy be revisited and amended to reflect volume (foliage lost), rather than quantity (one-for-one). It makes absolutely no sense to replace a mature 30 to 40 metre trees with one or two small trees. This policy must be amended urgently. A volume-based, rather than a quantity-based replacement policy for all future developments will reflect the foliage lost and is an urgent, absolute necessity if Christchurch is to achieve its goal of developing an urban forest environment. A volume-based replacement policy will also have the effect of rapidly replacing the carbon sinks lost in developments.	
	A noticeable aspect of the Kennedy's Green development is that not a single gum tree was spared. It would have been very easy not to remove all of the trees, leaving a few of them, creating a green, recreational area and building around it. This would have reduced the number of sections available for development and consequently the developer's profit. Speaking as a chartered accountant with over forty years' experience in accounting and finance, many of them in tertiary education, I strongly believe that this profit reduction could have been comfortably absorbed by the developer. While building around these remaining trees will inevitably reduce developers' profit margins, a balance needs to be found between giving a developer a reasonable return on investment and simultaneously protecting the environment, enhancing sustainability and creating healthy living spaces for future inhabitants - especially their children - to enjoy. The retention of some existing trees in future developments is essential. Some environmentally conscious developments in the neighbourhood, most notably Stoneridge and Bushland Park, have achieved this. Not only have they retained the existing trees, but have, in the case of Stoneridge, planted many more native trees. Clearly, retaining the existing environment and even enhancing it in new developments, can be done - it is not impossible.	
	PS I have numerous photos of the trees that existed before the Kennedys Green development started and the brown wasteland that it has now become. I am happy to supply these, if they will be of assistance.	

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50706	The key message I wanted to address was the issue of woodlots and forestry on Banks Peninsula.	Jeremy Elvidge
	I believe a biological version of recession planes as per residential building needs to be applied. There are ever so many examples of Pinus radiata and Cupressus macrocarpa being planted too close to roads and horizons.	
	These create: 1/ Obscuration of views 2/ Potential shading and road surface frost hazard 3/ road way visibility issues 4/ power line damage potential	
	Notable examples: Pigeon Bay Road	
	Various to Charteris Bay and Diamond Harbour Governors Bay over to Cashmere down to Dyers Pass Road Summit Roads We are stuck with existing plantings, but land owners within the now greater CCC should not be permitted to replace plantings within such zones. Especially re iconic views.nEg Cafe at Sign of the Kiwi	
	Furthermore, Chch is losing its status as the Garden City by virtue of developers removing notable tree specimens in favour of more apartments. Fendalton and Merivale becoming hard hit. Overseas examples preserve such.	
	A recent report highlighted ambient temperature variation within suburbia.	
	Treed vs modern naked shrub only developments. 10-20deg C cooler with trees in roadways and gardens.	
	Selwyn's Rolleston is a case in point. Revolting and poorly governed from a town planning sense. Ghastly narrow streets with parking woes, minor TREE planting. More focused on rates revenue than community ambience.	
	CCC is doing far better with the storm water wetlands concept planted in natives.	
	These are a credit to planning design.	
	But my key message is to address the forestry aspect and position on a site-by-site basis.	
	Maybe CCC and ECAN could consider incentives to land owners to consider native species suited to the sites.	

ROBERT GLENNIE

CHRISTCHURCH URBAN AREA

Following the 2010-11 earthquakes there was an unprecedented opportunity to take note of the place of Christchurch/Otautahi in the wider biophysical ecosystem. Large tracts of land around the Avon and Heathcote Rivers, Ihutai and in eastern Christchurch were going to be cleared because they were unfit for residential development due to the heavy liquefaction and lateral spreading that occurred.

I had hopes then, and still do now, given that the Christchurch City Council (C.C.C.), has decided there is a case for developing this plan, that this land might be repurposed as a green belt of sorts with horticultural and possibly light grazing (sheep) land uses being considered in the place of residential development. My vision is of it connecting with southern Christchurch through disused or repurposed industrial lands through Hornby, Sockburn and Just because it is empty land, does not necessarily mean it is fit for heavy development.

The proposed forestry plan can play an integral part in this.

THE PROPOSED FORESTRY PLAN

There are several aspects that I want to comment on, some of which have been considered in the plan and some of which have not (italics):

- Numerous areas around Christchurch are potentially fit for ecological reserves, which are small land parcels that have been repurposed for perhaps medium/high density vegetation they might be as small as residential property or as big as an old industrial site
- Could transport corridors, such as the railway corridor, Moorhouse Avenue, Blenheim Road, have trees planted along them/reconstruct the traffic islands with small tree species
- Around the airport, tall trees are understandably not feasible due to aviation safety issues, but could the service sites such as the rental car yards, all be required to plant trees that come up to roof height
- You acknowledge the increased likelihood of storm events, which is good particularly following the Auckland floods where we, like Auckland, need to acknowledge that we are building in areas we should not, and removing vegetation that is playing a critical role in reducing flood damage. If one looks at the flip side of the coin and note the drought and bushfire problem, the Port Hills fires of 2017 were in part exacerbated by the vegetation being quite flammable *eucalyptus* trees with oil that caught fire; *pinus radiata*. It is a good time to reconsider what vegetation we plant on the Port Hills, lest we have further destructive fires

ROBERT GLENNIE

In the new proposed planning laws, C.C.C. will need to find ways to increase the minimum vegetation levels on all residential properties, irrespective of whether they are new developments or existing properties – C.C.C. acknowledges this, which is encouraging

CONCERNS

To address these points and others that will be raised, C.C.C. will need to revisit it's City Plan provisions for vegetation. An education campaign might be needed to expand on the "what", "why" type questions.

EXPECTED OUTCOMES

By 2030 I hope to see the transport corridors like the railway line, Moorhouse Avenue and Blenheim Road with species that don't impede their form or function. By 2040 I am hoping to at the minimum see something of a crude green belt around the outskirts, plus a smaller belt around the estuary, acknowledging and reinforcing the role of Ihutai.

CONCLUSION

This is a good plan and I want to see it progress, especially if we are going to continue using the "Garden City" line of advertising.

I would like to preface this commentary to say that I think trees are fantastic and that our built environment is nothing without them. I completely understand the benefits we get from them. The explanations in this document are undeniable and I enjoy being in my own yard being around a number of semi established planted trees, which have been established by myself and previous owners.

I am never against planting trees and will often overplant, however with the introduction of a specific plan, I am perplexed at how something that can create such benefit and joy can be regulated into something so negative. Planting a tree is easy, often takes no maintenance and does its own thing. If we plant trees that then grow to become protected by some enforceable regulation, there could be a backlash to specifically avoid planting trees, or to cut them down before they have some status within the regulatory framework.

At a high level, I support the introduction of more trees, however specifically there is no detail on how trees are anticipated to be protected on private land, I understand that this can be done through resource and building consent provisions, however enforcing these will be challenging and onerous and will appear to punish those who wish to increase amenity to their own properties.

I would like to highlight some of items that should have been considered in more depth and which would allow the regulatory framework to be sharpened; namely:

- 1. Assumptions behind the Urban Forest Plan
- 2. Trees or planting in generally, how are we counting for carbon
- 3. Street trees; why we are where we are
- 4. Trees and prosperity
- 5. Protection of trees on private land; negative regulation or positive application
- 6. Application of the regulation
- 1. Assumptions behind the Urban Forest Plan

This document is focussed on tree planting and the benefit to the streetscape in the summer, the winter and the effects of tree and canopy density should not discounted. Christchurch can be hot, but is more temperate or colder than hot at all times throughout the year. Other than the deciduous argument, many native species do not drop their leaf canopy and could restrict low angle light into dwellings. Given there is no regulation relating to sunlight into dwellings, it is likely that planting a tree (especially if these are identified as critical infrastructure) will take precedence over allowing sunlight into a dwelling in winter months.

Towards the end of last year, Christchurch voted against the Government imposed NPS-UD that appeared not suit the Christchurch environment, mainly due to lack of direct sunlight into our

houses and extremely onerous boundary recession planes. I find it funny that we are now proposing an additional tree density on private land that will provide a similar amount of shading as a dwelling on a neighbouring boundary.

Other negative consequences of trees are the nuisance of leaf fall, obviously not an issue with an evergreen, however if deciduous trees are planted, leaf fall can be a significant burden, especially on the more vulnerable parts of society including the elderly and infirm. Overgrown trees and tree canopy can also lead to retention of moisture under the canopy or in structures alongside the tree. Limited light will penetrate through the canopy to dry out these moisture laden spaces.

If C02 reduction is the key, have we understood the extend of carbon sequestered by a mature tree, as opposed to a tree during its growth period up to maturity. If we find that there is an insignificant difference, would the Tree Plan be written differently? It would be good to understand these issues with further explanation as to how these effects would be managed.

2. Trees or planting in generally, how are we counting for carbon

One issue that has not been discussed within the tree plan and tree canopy cover measure, is that this does not take into account marshlands and wetlands. These are natural areas of their own which, despite their size in the Christchurch city area, do not appear on the canopy cover map in any significant way. Tree canopy is one thing, but is appears that natural planting, such as native grasses and low planting does not seem to be taken into account. This seems to be related to the fact that we are carbon counting the trees only and no other area because we lack the tools/knowledge to do so.

The other challenge with many of the unfunded sections of the plan is that the majority of this cost will be survey and data collection, rather than action. If the planting alone was counted and a generic growth rate applied, this survey and analysis cost could be reduced and put back into community planting efforts.

Another significant area which has become a left over area in the city is the red zoned land to the east of the city. This area is currently a patchwork of old residential trees and grassland which is being mowed in between. There are many areas of open fields here which could be a future 'Riccarton Bush'. There could be an increase from 10% to least 60% of the land in this large land bank.

It would be good to understand if carbon counting is solely focussed on planting or specifically trees and what other efforts the Council sees in the existing landbanks around the city, before land acquisitions are considered.

3. Street trees; why we are where we are

The Council requires owners/developers who remove trees to replace with two additional, which is great, however it seems that Council either does not, or is slow to replace their own tree assets once they die off. Not sure why this is, but on our surrounding streets we have some magnificent trees who are thriving (usually off leakages from storm and wastewater pipes) but many gaps in the berm which could/should have been replaced as an ongoing exercise. I suspect that if like for

like replacement was maintained, we would be at the 15% target right now, without a specific and regulated plan for tree canopy cover.

I have also observed that street trees have previously been poorly selected in many streets. We have a number of non-fruiting cherry trees on our street which are fantastic in the seasons but need attentive maintenance for them to thrive. The Council does not and should not have to provide this level of maintenance. Moreover, many trees become diseased and die off at some point, we cannot discount that some tree species have a finite life.

I understand that tree selection is becoming more important and selective, with more native species being planted when replacement is required. However, do wonder if there is a missed opportunity for more street planting and replacement regime rather than a specific new plan focussed on other areas in the developable city.

4. Trees and prosperity

Even without this plan there is no reason why street tree planting could not happen in all streets, no matter where these streets are in the city. It is also apparent that the location of heavy tree canopy is not about affluence, but where the city suburbs were built when the city first developed. Established trees provide good cover, many of the trees that were planted were oaks and other foreign species established by the first settlers which are now large and significant, as well as protected.

It is apparent that economically deprived areas tend to have less trees on the streetscape. There appears to be no other reason for this other than the Council not planting street trees or park trees in these areas. These streets are no different to other streets in the city and should be required to have street trees at a minimum before private land is required to have planting.

I think there is an erroneous assumption in the Plan that financial affluence means more trees. It also adds nothing to this Plan to make this point.

5. Protection of trees on private land; negative regulation or positive application

It is important that this Plan is seen as a positive thing, with tangible benefits or advantages to the owner (i.e not just the items noted within the plan, such as reduced heat, increased property value). The CCC has extensive planting provisions in the District Plan for new developments. These often stipulate minimum heights at planting, replacement periods if tree death occurs and even the height this should be maintained. Great ideas, but almost unenforceable without ongoing monitoring of every property at all times. This plan needs to be written in a way that does not penalise for non-compliance, but encourages or even pays for people who take advantage of planting trees. This could be form of a planning application rebate or discount or a discount to purchase a larger tree from a Council nursery.

Moreover, if a property has trees which are part of the urban forest canopy, how can these be removed if we intend to develop the land more intensely, rather than simply expanding our city limits to add more developable land. Currently, if a street tree is to be removed it is protected by height and roots bigger than 20mm are provided protected status if digging near these occurs. If this happens on a heavily vegetated section of land with an old building covering a small proportion of the site, these additional restrictions will create significantly more onerous development challenges.

The other issue is how and when this will be enforced onto private property. The only logical time for this to be applied to private land is during development. This will just be seen as another restriction or penalty for development. If medium density provisions come to play, there will be a fight for land and we will see trees which need room to grow, pushed into buildings restricting canopy and drip line growth.

This plan needs to be reviewed alongside provisions in the District Plan, as well as new regulations in building density on the horizon.

6. Application of the Regulation

One way to test a plan is to apply the regulation to a real life scenario. Below is a near future scenario which could be an issue:

A section of overgrown land sits ready for redevelopment. A developer purchases this and designs two dwellings around the smattering of trees and root protection zones around the site. It is not a good outcome for the developer or the Council, except that the tree canopy has been maintained, but not enhanced. Both the development and the trees will be hindered by each other because they have been planted/designed at mutually exclusive times.

However, if that developer was able to remove the some of the tree canopy, he would no doubt be able to increase the density of buildings as well as allowing new larger trees to be planted in harmony with the building and site. Under the Urban Forest Plan, it is unclear which would be preferred, but suspect the former.

It needs to be clearly understood what impacts this Plan will have on private land so the public can have a realistic view on the application. Without this we can only assume this will be applied with negative consequences.

Conclusion

Overall, I give the current Urban Forest Plan a lowly 2 out of 10. It appears to provide a lot of vague regulation with no specifics. It is pro-tree canopy at the cost of everything else. Working in a vacuum provides challenges for the people who have to work and apply the new regulations. Where these is no obvious solution to problems, people will often find loopholes. The Council are often part of the loopholes, especially where logic or common sense cannot be applied within the regulation framework.

Trees are important, but we are naïve to think that we will be saving our planet by making these meagre percentage increases and providing more regulations for developers or property owners to comply with. Overall this feels more political and data driven, than results driven. Going forward, I would like to know how this is going to realistically manifest in Regulation before this can be back-tracked, or side-tracked and then fixed into non-negotiable Regulation. С





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Stuff =

Controversial Auckland property developer sentenced to jail for 'brutal' damage to native trees

Anna Loren 15:58, Jan 26 2018



Auckland man Augustine Lau's property developments have been the subject of multiple Environment Court and District Court battles.

A controversial property developer jailed for two-and-a-half months for damaging native trees is just the tip of the iceberg. a





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10th February 2023

Christchurch City Council Te Hononga Civic Offices 53 Hereford Street Christchurch Central Christchurch 8013 engagement@ccc.govt.nz

Submission on the Draft Ötautahi-Christchurch Urban Forest Plan 2023

This is a submission made on the Draft Ötautahi-Christchurch Urban Forest Plan 2023 ('the Plan').

I would like to thank Christchurch City Council for the opportunity to make a submission.

I would like to be heard on my submission.

I currently live in Hei Hei in the Hornby Ward, my submission related to the Plan in general but also the low tree canopy cover in the Hornby Ward.

In making this submission I acknowledge that the Plan sets out how we in $\bar{\mathbf{0}}$ tautahi-Christchurch will grow our tree canopy and sustain a thriving urban forest of healthy, diverse and resilient trees. Furthermore, I acknowledge that the Plan sets our direction and priority for planting, nurturing and protecting trees in $\bar{\mathbf{0}}$ tautahi-Christchurch now and in the future.

I acknowledge that trees provide a range of social, environmental, cultural ecological and economic benefits and services that enrich the quality of urban life and contribute to a well-functioning urban environment.

The proposed vision 'to preserve, value and grow our urban forest, to sustain $\bar{\mathbf{0}}$ tautahi Christchurch' reads more as a plan objective. I consider the vision statement should be more aspirational and consider the desired future state in fifty-years time.

I support all the principles of the plan, and in particular the 'for everyone' principle which states that the urban forest will be distributed across the city to support the wellbeing of our residents and the natural environment. It is critical that the principle of equitable tree covers informs plan implementation through priority urban forest a**ff**orestation areas which should be specified in the Action Plan (Appendix 1).

In making this submission I have read the most recent canopy cover report - Morgenroth, J., (2022) Tree Canopy Cover in Christchurch, New Zealand 2018/19. Prepared for Christchurch City Council. University of Canterbury. Morgenroth, J., (2022) states that canopy cover is highly

variable within Christchurch's fifteen wards, with the Hornby Ward having the lowest for canopy cover at 6.51%.

I support Goal 1 of the Plan with the target of >20% tree canopy cover city-wide by 2070. I strongly support the direction to distribute canopy cover equitably, with no ward having less than 15% canopy cover.

I also support the focus on roadside tree planting, and the creation of green/ecological corridors.

I support the review of canopy cover targets when there are changes to government policy direction. In particular the Proposed National Policy Statement for Indigenous Biodiversity may set out targets for indigenous vegetation in urban areas.

I support in part the 2070 target canopy cover for open spaces being 40%. This is due to the need to address the inequity of public space on a ward by ward basis in the first instance. This requires meeting the level of service targets for the distribution and accessibility of open space being 80% of urban residential properties are <500m from a park (any type of park except a utility park) at least 3000m2 in size. It also requires meeting provision targets, being 20ha/1000 people for Regional Parks and 5.9ha/1000 people.

The large industrial component of the Hornby Ward means that there is less open space, less residential and more commercial (primarily industrial) land uses in the ward area. I understand from the Plan that targets for increasing tree canopy cover over 50 years is to be based on plan zones from the District Plan. Without land use change in the Hornby Ward, including an increase in open space, the ward will continue to have low tree canopy cover and uneven distribution of tree canopy cover. Without addressing the inequities of open space, tree canopy cover targets for open space will "lock-in" inequity. It is important to recognise that the 15% tree canopy cover target for a ward could be achieved with roadside planting and plantings/retention of trees on private land (commercial, mixed-use, industrial and residential), which does not have the same material benefits as forested open-space.

Given the baseline state of the Hornby Ward, it is recommended that the Plan is amended to include priority urban forest afforestation areas which should be outlined in the Action Plan (Appendix 1). This must be included in the 2024-2034 Long Term Plan.

The Hornby Ward must be a priority for the Plan, particularly due to the concentration of industrial land uses and the propensity for the ward to struggle with urban heat island effect, increased pluvial flooding and the unhealthy concentrations of dangerous particulate matter in the ward.

I support Goal 2 of the plan and the principle 'right location, right tree, right function'. This principle must acknowledge that the 'wrong location' can and, in certain instances, should be modified to accommodate afforestation, especially in areas that are severely constrained. This is not explicitly clear in "select and design planting sites to enable a tree to reach maturity and minimise conflicts with the surrounding area". In certain areas, site selection should be based on modifying the surrounding area and/or purchasing suitable sites.

A key aspect of achieving the target canopy cover for the Hornby Ward will involve the undergrounding of infrastructure, particularly overhead transmission lines of the distribution network. This must be included in the action plan as it will impact trees as they grow to semi-maturity and maturity.

I support Goal 3 of the plan which recognises urban tress as critical infrastructure, and that replacement and renewal of urban tress is unlike most assets.

I strongly support Goal 4 of the plan which sets out how the plan will involve mana whenua, community groups and property owners. It is critical that the Action Plan (Appendix 1) outlines the steps that will be taken to involve those with interests in the Hornby Ward for addressing the entrenched inequity of tree canopy cover in the ward.

I am concerned that the statement 'planting in existing suitable locations can be relatively inexpensive and complement outcomes' will continue to entrench the inequity of the distribution of tree canopy cover, as under-serviced areas may have disproportional amount of unsuitable areas that cannot readily accommodate plantings without investment and modification of the existing environment.

I acknowledge that to be successful, Council will need to fund a large-scale tree planting programme across the city. I reiterate that there must be thoughtful and careful consideration of how to prioritise and fund large-scale tree planting.

I do not support the use of financial contributions for tree planting from landowners that develop a site that is under 20% tree canopy cover. The effects of the development may not be associated with the removal of tree canopy cover and using a financial contribution which is unrelated to the effects is not in accordance with the use of financial contributions including for permitted activities under the Resource Management Act (1991).

As the use of financial contributions relies on some sort of trigger, for permitted land use activities this could be a building consent, there is no clear indication for Council that a site was cleared or trees felled for the purpose of development particularly for small infill developments, such as an additional residential unit on a site that will be able to benefit from the Medium Density Standards once Council progresses Plan Change 14.

It is also unclear as to whether an applicant which choses to provide 20% tree canopy cover within the body of a site rather than o**ff**set by paying a financial contribution will retain those trees to be planted in perpetuity and how much time and resource Council will be able to dedicate to monitoring the retention of those trees which are a permitted activity then cover costs.

I do support mechanisms and tools for encouraging and incentivising tree canopy cover increases on private land. However, financial contributions provisions in the District Plan will be fraught with implementation challenges, legal challenges, disputes and seems unworkable. To that end, I support the action to investigate ways Council can incentivise and support private land owners to retain and plant more trees.

I support the action to undertake a desktop analysis of our city to locate viable planting spaces across Council land. This should be accompanied with corresponding action to prioritise afforestation sites on the basis of the inequitable distribution of tree canopy cover.

I strongly support the action to assess suburbs with low canopy cover to determine why it is low and determine what can be done to increase it. This action must be partnered with Goal 4 'involve' including the local communities of areas with low canopy cover. I strongly support the action to target new planting projects in areas with low canopy cover. I also strongly support the action to identify where land may need to be acquired for the purpose of increasing tree planting, particularly in areas of low canopy cover and, where possible, in association with achieving other Community Outcomes.

The community in Hornby strongly supports the creation of a 'Hornby Bush' with native trees and ecological connections to the lower slopes of the Port Hills and the Waimakariri River.

I support the action of identifying tree species that will be more suited to the city's future climate and those which will be more vulnerable. This should not be to the detriment of biological diversity and represent the afforestation of monocultural stands. To that end, I strongly support the action to monitor tree species diversity to ensure the city has no greater than 30% of one family, 20% of a single genus or 10% of a single species.

I support locating areas that are eligible to be included in the Emissions Trading Scheme as post-1989 permanent forest. Where possible these must be long-lived native species, and this must be included in this action.

I support in part the action to develop a high-level tree planting programme that extends over 50 years to reduce the quantity of trees reaching maturity at the same time. Reducing the quantity of trees reaching maturity at the same time should also take into account plantings of long-lived native species.

I support action to increase indigenous afforestation, however this should accompany actions for retaining, protecting and where suitable planting non-invasive exotics that contribute to the character and identity of $\bar{\mathbf{0}}$ tautahi-Christchurch. The balance to be achieved must take into account the biodiversity crisis and the need to restore indigenous species.

I support the action to plant exemplar plots of di**ff**erent species in a range of environments, to foster public understanding of 'right tree, right location'. The Hornby Ward must include exemplar plots.

Ng**ā** nihi,

George Sariak

Cameron Bradley

Subject: Submission on Ōtautahi Christchurch Urban Forest Plan

To whom it may concern,

I am writing in broad support of your urban forest plan for Ōtautahi.

My primary reasons for support are that it will ensure this significant issue is measured, monitored and placed on the Council agenda for years to come. I commend this project for having a relatively measurable and easy to follow action plan. I would also like to warn Council not to underestimate the importance of private developers and homeowners in achieving this goal. It is critical that the Council gets the incentives right so that these people and businesses join the quest for improved tree coverage, rather than fight against it.

It has been shown around the world that intensification does not need to come at a cost to tree coverage, with common solutions being green rooftops or lower site building footprints and higher storied developments. However the types of intensification we see in Christchurch work counterproductively to our tree coverage goals. I would love to see council work to realise a quality high-tree coverage, high-housing stock development so that developers and residents alike can see how this could be done.

The detailed feedback I have is as follows:

- Goal 4: Involve I believe there needs to be an objective on involving developers and homeowners in this process.
- Objective 1.1, action 7 as mentioned above, I do not believe the importance of this action can be understated.
- Objective 1.1, action 8 I believe the financial contribution part of this should be reworked. I agree with the 20% target and do not think this should be able to be compromised on. In addition to this I believe that developers should be able to receive a negative offset to their development contributions for achieving higher than average tree coverage.
- Objective 1.2, action 1 if a financial instrument were in place, a simple response would be to alter the financial benefit by ward/suburb where locations with high coverage have little benefit and locations with low coverage have higher benefit.

Thank you for the opportunity to submit on this project.

Cameron Bradley

SUBMISSION TO:	Christchurch City Council
ON:	Ōtautahi Christchurch Urban Forest Plan
BY:	Waitai Coastal-Burwood-Linwood Community Board
CONTACT:	Paul McMahon Chairperson, Submissions Committee C/- PO Box 73023 CHRISTCHURCH 8154 021 184 1072 paul.mcmahon@ccc.govt.nz

1. INTRODUCTION

The Waitai Coastal-Burwood-Linwood Community Board appreciates the opportunity to make a submission to the Christchurch City Council on the Ōtautahi Christchurch Urban Forest Plan.

The Board wishes to be heard in support of this submission.

2. SUBMISSION

Please provide any comments you have on the Plan (is there anything we have missed, is there anything you would like considered?) please be specific as possible to help us understand your views.

- 1. The Board notes that there appears to be nothing in policy on how to deal with dead trees or tree stumps once they have been cut down.
- 2. After trees have been cut down, the roots are often still growing and can cause issues with infrastructure. The Board ask that consideration be given to including something within the policy for disposal of stumps, where necessary.
- 3. Planting more trees require higher service levels for clearing the stormwater network. The Board queries whether this has been taken into account in costs of implementing the policy and asks if it has been what the costs of those increased service levels are.
- 4. The Board would like to see existing trees retained unless there is a sound ecological reason for their removal.
- 5. The Board strongly endorses, the principle of when removing one tree, two more trees are replanted.

6. The Board endorse Goal 2 of the action plan to base tree selection on species' needs and attributes that benefit the immediate environment (2.3).

Paul McMahon Chairperson, Submissions Committee WAITAI COASTAL-BURWOOD-LINWOOD COMMUNITY BOARD

20 February 2023



27/02/2023

Christchurch City Council 53 Hereford Street, Christchurch 8013

Tēnā koutou,

Submission on Ōtautahi Christchurch Urban Forest Plan

- Thank you for the opportunity to submit on the proposed Ōtautahi Christchurch Urban Forest Plan. This submission has been compiled by Te Mana Ora (Community and Public Health) on behalf of the National Public Health Service and Te Whatu Ora Waitaha. Te Mana Ora recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora Act 2022 and the Health Act 1956.
- This submission sets out particular matters of interest and concern to the National Public Health Service.

General Comments

- We welcome the opportunity to comment on the Ōtautahi Christchurch Urban Forest Plan.
- 4. The future health of our populations is not just reliant on health care services but is influenced by a wide range of factors beyond the health sector.
- 5. These influences can be described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and



behavioural factors. They are often referred to as the 'social determinants of health¹.

6. Access to tree cover and green spaces is an example of a determinant of health, which can have strong impacts on the health and well-being of communities. Te Mana Ora commends the Ōtautahi Christchurch Urban Forest Plan and its strategic approach to ensuring equitable access for communities and residents in Ōtautahi Christchurch to trees and green spaces now and in the future.

Specific Comments

7. Te Mana Ora strongly supports the proposed Ōtautahi Christchurch Urban Forest Plan. Te Mana Ora commends the comprehensive nature of the plan and the consideration of many aspects relevant to the health and wellbeing of individuals, the community, and the environment.

Integration of the Plan

8. Te Mana Ora recommends that the Christchurch City Council considers becoming a Biophilic City, or National Park City, or Green City, as mean of integrating the ethos and understandings encapsulated within Ōtautahi Christchurch Urban Forest Plan across the whole of Council.

We note that the Urban Forest Plan aligns with existing Council and sub-regional plans, including: the Draft Ōtautahi Christchurch Plan, the Draft Ōtautahi Transport Plan, Te Haumako Te Whitingia Strengthening Communities Together Strategy, and Kia tūroa te Ao Ōtautahi Christchurch Climate Resilience Strategy. However, Te Mana Ora sees the benefit in applying a broad kaupapa and all-of-council approach to integrate the values and principles of protecting the natural environment, seeing trees and biodiversity as critical infrastructure for human and

¹ Public Health Advisory Committee. 2004. The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health. Public Health Advisory Committee: Wellington.



environmental health, and making innovative plans to protect and support biodiversity to flourish.

For example, if the Christchurch City Council became a Biophilic City, this could provide a helpful framework that could be applied and integrated across all of Council's work and result in a number of indicators related to biodiversity and the natural environment being monitored and strengthened, creating compounding benefit for the community. For example, being a Biophilic City could mean monitoring the percentage of tree cover as captured in the Urban Forest Plan, but also green walls and planted rooftops, areas of indigenous habitat, participation in community gardening and native planting, natural elements and forms within city architecture, and number of new projects related to enhancing and protecting indigenous habitats.² Applying these indicators *(or similar) together would compound the benefits and aspiration of the Ōtautahi Christchurch Urban Forest Plan and create larger benefits for the health and wellbeing of the community and the health of the natural environment.

Health benefits of trees and green spaces

- Te Mana Ora strongly supports the plan due to the numerous health benefits that trees, and green spaces create for human and environmental health. Some of the main benefits are further outlined below.
- 10. *Physical activity:* trees and green spaces have been linked with increased levels of physical activity as they create public areas for people to play and be active in³. A local study from the University of Canterbury found that people who live close to parks or green spaces are less likely to be overweight or suffer from obesity, outlining an important relationship between green spaces on health⁴. In addition to

² Beatley, T., & Newman, P. (2013). Biophilic cities are sustainable, resilient cities. Sustainability, 5(8), 3328-3345.

³ Richardson, E. A., Pearce, J., Mitchell, R., & Kingham, S. (2013). Role of physical activity in the relationship between urban green space and health. Public health, 127(4), 318-324.

⁴ Richardson, E. A., Pearce, J., Mitchell, R., & Kingham, S. (2013). Role of physical activity in the relationship between urban green space and health. Public health, 127(4), 318-324.



this, physical activity has significant health benefits, including benefits to cardiovascular, respiratory and mental health⁵.

- 11. Improved mental health and wellbeing: access to trees and green spaces has a significant impact on a community's well-being and relationship with nature⁶. Increased trees and green spaces such as parks have been shown to help build social connections and increase social cohesion in a neighbourhood. In addition, spending time in green spaces has been linked to improved mental health, with reduced feelings of stress, anxiety and depression and improvements to overall mood⁷.
- 12. *Improved air quality:* Air pollution is recognised to be a significant environmental risk to health, as air quality contributes to premature deaths, hospitalisations, asthma, and restricted activity days⁸. Trees play an important part in absorbing carbon dioxide and other pollutants from the air, improving air quality and reducing the levels of harmful particles in the air.
- 13. *Mitigation against climate risks*: As noted in the plan, trees play an important role in mitigating against climate-related risks, such as urban heat islands, floods and storms. Each of these climate-related risks and events have a significant impact on the health of individuals and communities, including direct impacts such as mortality from excess heat and indirect impacts such as impacts the housing quality and disruptions to healthcare services and provision. These relationships are complex, however it is important to recognise the significant impact of climate-related risks on health and to put into place actions that will mitigate against these effects, such as increasing urban tree canopy and green spaces.

Further to this, the recent heavy rain and cyclone in the north island has caused flash flooding, landslides and widespread devastation. At the time of writing, the complete extent of destruction and effects experienced from these climate-events is

6 Shanahan, D. F., Cox, D. T., Fuller, R. A., Hancock, S., Lin, B. B., Anderson, K., ... & Gaston, K. J. (2017). Variation in experiences of nature across gradients of tree cover in compact and sprawling cities. Landscape and Urban Planning, 157, 231-238.

⁵ Miles, L. (2007). Physical activity and health. Nutrition bulletin, 32(4), 314-363.

⁷ Nutsford, D., Pearson, A. L., & Kingham, S. (2013). An ecological study investigating the association between access to urban green space and mental health. Public health, 127(11), 1005-1011.

⁸ Environmental Health Intelligence New Zealand. 2022. Key findings from HAPINZ 3.0. Retrieved from: https://www.ehinz.ac.nz/projects/hapinz3/key-findings-from-hapinz/


yet to be seen. However, the wide extent of the impacts is caused in part due to deforestation and reduced absorbent green spaces in these regions. Trees and green spaces play a critical role in absorbing excess surface water, with the Woodland Trust UK estimating that trees reduce surface water run-off 80% more compared to asphalt⁹. The unfolding situation in the north island only highlights the critical nature of the Ōtautahi Christchurch Urban Forest Plan and its implementation.

14. *Enhancing and Supporting Biodiversity:* As noted in the Plan, increasing tree cover in Ōtautahi Christchurch will also support indigenous biodiversity, which is also critical for health and wellbeing. Lack of biodiversity in part of Ōtautahi Christchurch, and climate change impacts to biodiversity, are likely to have negative impacts to well-being, physical and mental health of communities. Engaging with natural environments has been shown to reduce stress, restore attention, increase positive feelings and mood, and reduce depressive symptoms.¹⁰ Therefore, supporting indigenous biodiversity, and allowing the community to engage in this process too, will have an empowering and positive impact on the health and wellbeing of communities.

Equitable tree coverage

15. Te Mana Ora is pleased to see that the matter of equitable tree cover has been addressed in the plan. International and local evidence shows the inequitable distribution of parks and green spaces between socioeconomically advantaged and disadvantaged areas. This trend is also reflected in areas of Ōtautahi-Christchurch, where some neighbourhoods are comparatively lacking in tree cover and accessible public green spaces. For example, the tree cover in Linwood is around 8.9% compared with Fendalton which has 19% tree cover.¹¹

⁹ Woodland Trust UK. (2023). Can Trees and woods reduce flooding? (2023). Retrieved from: https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/british-trees/flooding/

¹⁰ Aerts, R., Honnay, O., & Van Nieuwenhuyse, A. (2018). Biodiversity and human health: mechanisms and evidence of the positive health effects of diversity in nature and green spaces. British medical bulletin, 127(1), 5-22.

¹¹ Law, T. (2022). Time running out to save Christchurch's trees from housing intensification. Stuff News: https://www.stuff.co.nz/thepress/news/127846951/timerunning-out-to-save-christchurchs-trees-from-housing-intensification





This relationship is further demonstrated with data from the Canterbury Wellbeing Index¹² (above), which shows a clear pattern of increasing satisfaction with ease of access to the natural environment with increasing household income. In 2019, 91.5% of respondents to the survey in the \$100,000+ annual household income group were satisfied with their ease of access to the natural environment compared with 72.5% of respondents in the <\$30,000 income group.

Given the considerable health benefits that trees and green spaces provide, it is important these areas and connections with the environment can be accessed equitably throughout the city. An inequitable distribution of parks and other green spaces could increase poorer health outcomes for people on lower incomes. As details for the Ōtautahi Christchurch Urban Forest Plan are further outlined and implemented, Te Mana Ora recommends careful prioritisation of neighbourhoods and areas which currently have less access to green spaces and tree canopy cover.

¹² Canterbury Wellbeing Index. (2019). Environment: Access to natural environment. Retrieved from: https://www.canterburywellbeing.org.nz/ourwellbeing/environment/access-to-natural-environment/



Types of trees planted

16. Te Mana Ora recognises that the Ōtautahi Christchurch Urban Forest Plan provides a high-level overview and does not include a specific plan for the types of trees that will be planted.

However, Te Mana Ora strongly advises against the planting of allergen-producing trees such as silver birches. Pollinating trees and grasses are a concern for those with seasonal allergies and asthma¹³. Changes in the climate have also increased the risk of thunderstorm asthma in New Zealand, where a significant thunderstorm coincides with high-levels of pollen in the air, triggering asthma-related symptoms¹⁴. This is a public health concern, for people with allergies and asthma, as well as those with undiagnosed asthma. Those with undiagnosed asthma are at particular risk as they are unlikely to have the appropriate medication or support required to treat the flare-up¹⁵. The first thunderstorm asthma cases in New Zealand were following a thunderstorm event in Waikato in 2017, where a sudden increase in severe asthma cases were recorded, some of whom had not experienced asthma before¹⁶.

The best way to avoid thunderstorm asthma and severe allergies is by prevention and by considering the environmental conditions, such as the types of planting in the environment.

Damage to infrastructure

17. Te Mana Ora notes that, as mentioned in the plan, mature tree roots can cause damage to infrastructure such as footpaths. Tree roots can cause footpaths and streets to buckle and become uneven, which is of concern for those with limited mobility, have a visual impairment, use a wheel chair or pram. Ensuring that public

Asthma and Respiratory Foundation NZ. (2023). Pollen and Plants. Retrieved from: https://www.asthmafoundation.org.nz/your-health/living-with-asthma/common-asthma-triggers/pollen-and-plants#:~:text=Other%20shrubs%20and%20trees%20which,daisies%2C%20marigolds%2C%20and%20chrysanthemums.
 Sabih, A., Russell, C., & Chang, C. L. (2020). Thunderstorm-related asthma can occur in New Zealand. Respirology Case Reports, 8(7), e00655.
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infrastructure is maintained enables access to services at all levels and enables participation by people of all ages and abilities.

Conclusion

- 18. Te Mana Ora does not wish to be heard in support of this submission.
- 19. If others make a similar submission, the submitter will not consider presenting a joint case with them at the hearing.
- 20. Thank you for the opportunity to submit on Ōtautahi Christchurch Urban Forest Plan.

Ngā mihi,

Vince Barry Regional Director Public Health Te Waipounamu National Public Health Service

Te Kāwanatanga o Aotearoa New Zealand Government

Our Urban Forest Plan for **Ō**tautahi Christchurch

A commentary by Ian Spellerberg. Emeritus Professor of Nature Conservation, Lincoln University. March 2023.

General comments.

Thank you for the opportunity to offer some feedback.

Having been present at the first meeting of the Task Force and subsequent meetings I was very pleased to receive a copy of the latest version of the Plan. As with most things, progress has been slow, caused mainly by COVID. I appreciate that a huge amount of people hours has gone into the preparation of the Plan. In general, it is well written, and the graphics are most enlightening and helpful.

In my opinion this Plan is to be commended and indeed applauded. It is a timely report that will provide many benefits over very long periods of time. As well as environmental benefits there will be benefits for health and economics. For the sake of sustainability, I urge CCC to recognise the urgency of implementing such an important Plan.

The focus of the Plan is about increasing the City's tree canopy. A secondary focus is about conserving and restoring indigenous biological diversity. Sir David Attenborough in his 2020 book *A Life On Our Planet* notes that "people, quite rightly talk a lot about climate change. But it is now clear that man-made global warming is one of several crises at play". There is for example pollution, conversion of natural habitats to farming, warming the earth, and rate of biodiversity loss that is more than 100 times the average".

It is to be hoped therefore that the 8,000 trees may include very few exotic species. Every tree species has evolved to become part of complex of interactions within its biotic environment and ecological synstem. Many different species make up a forest community. Thus, the definition of biological diversity includes "diversity within and between species". Having exotic tree species in a forest of indigenous tree species would be like having guitar players take part in Beethoven's 5th symphony. It breaks all the rules.

Every new planting of an exotic species contributes to the decline of indigenous biodiversity. Every exotic tree species that is planted will be at the cost of one less indigenous tree and loss of associated biota. The process of using exotic tree species does not address the loss of our biological diversity. It is not valuing our natural heritage. It is not cherishing the unique tree species of Aotearoa.

The goal is 8,000 trees. What about native shrubs and grasses? Will they be part of the Plan?

Suggestions for editing.

The title. I suggest that the title be changed to reflect the content of the Plan. For example: "Increased tree numbers to help restore biological diversity and help offset greenhouse gas emissions in Ōtautahi Christchurch (excluding Banks Peninsular). Suggestion for an additional paragraph.

Please insert:

"Geologically speaking Aotearoa has existed for millions of years. Therefore, I suggest it is helpful to acknowledge that the isolation and geological history is today represented by unique and ancient ecological communities, flora, fauna and many endemic species. Few other locations on earth such as Madagascar and the Galapagos Islands have such unique ecology and biogeography. I refer you to Jock Phillips' book *A History of New Zealand in 100 Objects* in which the first object is a fossil."

Page 4.

In reference to the Quote from Mahaanui lwi Management Plan, 2013. Please take particular note of the last sentence: "The relationship between tāngata whenua and indigenous biodiversity has evolved over centuries of close interaction and is an important part of Ngāi Tahu culture and identity." The implications are surly very important.

Suggestion for an additional paragraph.

Please insert:

"Our flora is famous the world over. More than four-fifths of the flowering plants are to be found growing wild in no other land. Amongst its members are great tree-daisies, giant yellow and white buttercups, arboreal lilies, bayonet-like Spaniards, yellow and bronze lilies forget-me-nots, huge mountain marguerites, vegetable sheep, evergreen trees of many kinds, shrubs of varied aspects, and dainty herbaceous, or partly-wooded plants."

From L. Cockayne's 1923 book The Cultivation of New Zealand Plants.

Page 5.

I suggest that the leading two lines (trees are on the job for us,....) adds little to the text.

I suggest that this would be a good place to define what is meant by several technical words. For example, the wider public may not understand what is meant by 'forest' (as opposed to 'woodland'), 'canopy cover', 'ecological emergency' and 'sequestering'. A list of definitions of technical terms in an appendix would be helpful. For example, loss of biological diversity by way of introduced species is one component of the 'ecological emergency'.

With reference to the highlighted text in the Plan. This mentions 'natural system'. Ecologically and biogeographically, surely it is 'unnatural' because of the many exotic species and because of human impacts.

Mention is made here of "negative aspects of trees". Perhaps add "health issues" such as those caused by silver birch (the most common of all tree species in Christchurch and of which there are 4768 specimens in the City).

Page 6.

Would it be sensible not to extend this Plan to trees on private land at this time? Socially, ecologically and biogeographically the two areas are quite different.

I suggest that the four bullet points on the left be preceded by saying "Indigenous species only". Then say, "chose and plant trees on the basis of ecological principles". That is suggested to try and avoid subjective criteria such as replacing like tree with like or selecting a tree species on the grounds of how beautiful they are.

Perhaps it would be useful to include a conceptual diagram for selecting the right location, right tree, right function. For example, the steps might include questions such as: Is the species indigenous, if not is the tee to be planted in an arboretum or planted for educational benefits. Consult Lucas Associates guides to soil types and the native Plant Guide for Canterbury. Does the species have ecological value (rare), spiritual, cultural or ecological value. Not forgetting: "The relationship between tāngata whenua and indigenous biodiversity has evolved over centuries of close interaction and is an important part of Ngāi Tahu culture and identity." Also, Consult with highly qualified plant ecologists such as Dr. Colin Meurk. Consult the web pages of the New Zealand Plant Conservation Network.

Page 7.

I refer to the top right image in which it says, "trees protect biodiversity by providing habitat'. I suggest "Trees provide resources for a very diverse range of other plants and as well as birds and invertebrate animals". The difference between indigenous and exotic tree species is that the former has developed close ecological associations (evolved) with other biota over thousands if not millions of years. That is not the case for exotic tree species which may provide only some resources on a casual basis.

Page 9.

With reference to "Our urban forest is unique and complex". Surely, it's not a natural system. It has resulted from the influence of humans and their activities.

With reference to 'tree heritage'. Many of the mature introduced tree species come from a period from the 1860's and onwards. During that time, acclimation societies were established to promote introductions of animals and plants. Introduced species were not selected based on ecological criteria let alone biogeographical criteria. In the book *Gamekeepers for the Nation* by R.M. McDowall (1994), he notes the following criteria were employed to augment the limited variety of species already available, include species that the settlers thought important to a civilized existence, to provide species that would increase the pleasures of life in a newly adopted land.

Ecology as a science was not recognised until the early 1900s. Biogeography as a science has changed from a descriptive and subjective narrative to an analytical and objective science.

Within the current and more informed context, the practice of mixing tree species and other biota from different ecological systems can be seen as being unacceptable and indeed

arrogant. In my opinion we have inherited a legacy (mixture of tree species from different ecological systems) and one not to be proud of. Surely, we owe nature an apology!

Page 10.

Very useful graphics and a stark reminder of the past era of deliberate introductions. It's worrying that the most common tree species is the silver birch. The pollen of which is a major cause of seasonal hay fever and asthma as well as food allergies.

Page 11.

Here there is a brief and helpful text about 'diversity'. Please add some literature references. Not to forget that dead trees are hosts to a diverse array of species.

Page 12.

Could there be a link to the CCC Biodiversity Strategy? Is this the right place to identify conservation and sustainability projects that might benefit from the action of this Plan. For example, does the CCC National Park City project still exist?

Page 13.

Excellent text. Perhaps identify the educational values and opportunities of the Plan.

Page 16.

"Whilst maintaining the large deciduous landscape that Ōtautahi Christchurch is known for." I suggest better to be known for conserving and restoring our indigenous biota (and addressing 'climate change' and not to be reminded of the legacy of introduced species.

Page 17.

With reference to 'targeted' canopy covers, it would be useful to have more information about how these were identified and calculated.

Page 18.

Appendices and Goals.

There will surely be much debate about the monetary cost of implementing the Plan. I suggest that such a debate must at the same time consider the advantages and values of an extended tree canopy and restored native biota. Those advantages and values extend far into the future and could be expressed in monetary terms.

I hope the CCC will seek to have collaboration for implementing the plan – for example with industry, tourism, and education organisations.

I have no other specific comments to make only to say that they seem to be very comprehensive and rightfully ambitious.

My recommendations (no particular order). That most if not all 8,000 trees be indigenous species and be grown from local seed sources. That the focus of the Plan to be both climate change and the conservation and restoration of our native flora and fauna.

That CCC prepare policy of planting only native species only on public land. Exceptions to the rule might include arboretums (botanic gardens), educational resources and fruit trees.

That CCC establish a working group with the aim of preparing a separate plan for trees on urban private land.

I strongly suggest that the following 2022 paper be used when a revised draft is being prepared. Colin Meurk, *Tree Canopy Cover Benefits Affected by Urban Intensification – Biodiversity and Related Issues.* In my opinion this paper is the most authoritative, most informative and scientific paper about urban trees, biodiversity and related issues.

General suggestions (no particular order).

I suggest that it would be helpful to include a list of public and private native plant restoration projects that are taking place in and around Christchurch City.

It might be useful to cite more references and list them in an appendix.

Finally, I suggest that CCC prepare a step-by-step conceptual guideline and set of criteria for the process of selecting the tree species for Christchurch City.

Congratulations to the team who prepared the Plan.

P.S. Earlier I referred to L. Cockayne's 1923 book *The Cultivation of New Zealand Plants*. He obviously cherished New Zealand native plants. One hundred years later there are more and more native shelter belts and field boundaries being planted. Garden centres are stocking native plants far more than ever. In and around Christchurch there are many native plant restoration projects. Suppliers of native plants are not able to keep up with demand. That demand is coming from many sectors including industry, agriculture, tourism and both private and local government. In the last 20 years the interest in native plants has significantly increased for several reasons, particularly in here Canterbury. Our indigenous flora has never before been cherished by so much by so many people. Perhaps that is an apology to nature.

In the last 20 years there has also been a notable increase in the number of books about New Zealand's native flora. I make no apology for listing the following.

Establishing shelter in Canterbury with nature conservation in mind. Environment Canterbury and the Isaac Centre for Nature Conservation. 2003.

Going native. Growing and using New Zealand native plants. Edited by Ian Spellerberg and David Given. Canterbury University Press. 2004. Reprinted 2009.

Living with natives. New Zealanders talk about their love of native plants. Edited by Ian Spellerberg and Michele Frey. Photography by John Maillard. Canterbury University Press. 2008.

Native by design. Landscape design with New Zealand plants. Edited by Ian Spellerberg and Michele Frey. Photography by John Maillard. Canterbury University Press. 2011. Reprinted twice in 2012.

27 February 2023

Christchurch City Council

By online submission to 'Have your say' page

Tēnā koe,

Waipapa Papanui-Innes-Central Community Board Submission on the $\bar{\mathbf{0}}$ tautahi Christchurch Urban Forest Plan

1. Introduction

The Waipapa Papanui-Innes-Central Community Board ('the Board') thanks the Council for the opportunity to submit on the Ōtautahi Christchurch Urban Forest Plan ('the Plan'). It does so in accordance with its role to represent, and act as an advocate for, the interests of its community in the Papanui-Innes-Central area.

2. Submission

The Board is generally supportive of the Plan, and endorses its vision: To preserve, value and grow our urban forest, to sustain Ōtautahi Christchurch.

Having given particular attention to the objectives of the Plan, comments are made below under the objectives that most relate to points offered into this process on behalf of the Board:

Objective 1.1 Grow our urban forest and achieve and maintain canopy cover targets

The Board is supportive of this objective; targets are important in this respect for ensuring we have some accountability for how we are tracking in growing our urban forest.

Objective 1.2 Distribute canopy cover equitably, with no ward having less than 15% total canopy cover

The Board fully endorses this regard for equity; all parts of our city should be able to share in the benefits of growing our urban forest.

Objective 1.3 Increase planting requirements within our streets

The Board is very supportive of this objective, though would emphasise recognition of the principle 'right tree, right location'; it is important that we plant trees that are valued, safe, and sustainable.





Papanui Service Centre 5 Restell Street Christchurch 8013

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> > ccc.govt.nz



Trees that may foreseeably cause abnormal levels of allergy, unduly attract nuisance species of birds or pest in the context of climate change, or grow in ways prone to cause unreasonable burden, danger, property damage or maintenance costs, should be avoided for the street environment where possible.

Objective 2.1 Grow an urban forest that is resilient and contributes to mitigating the effects of climate change

The Board supports the actions that aim to establish tree species most suitable to our changing climate. The Board would also recommend that careful consideration be given to avoid planting species that could exacerbate the risk trees can pose in storm events or that might attract new pests.

In terms of resilience and the prospect that climate change may include a greater tendency toward drought at times, it is suggested that consideration be given to tree species that can survive with less water in these periods, and pose less fire risk.

It is suggested the assessment of current and future trees look to opportunities to synthesise the resilience of our urban forest with that of our communities more generally – resilience might carry connotations of both sustainability and also preparedness for disasters and extreme weather.

Objective 2.2 Safeguard our urban forest and ensure a healthy, diverse range of tree species and ages

The Board supports the value of a diversity of species, wishing to avoid unnatural monocultures and the risks they may imply. It is also reasonable that achieving a diversity of tree species should not cause undue detriment in other respects. It may be conceived that some degree of monoculture in some places could be natural and better achieve the plan's goals – the evidence should be able to inform the decisions, as well as our shared and diverse values.

Objective 2.3 Base tree selection on species needs and attributes that benefit the immediate environment

The Board whole-heartedly agrees with this objective, noting with approval the specific actions set out to achieve it.

Objective 2.4 Increase the visibility of native tree species and create ecological corridors

The Board is supportive of the intent of this objective, only seeking that consideration is given to the potential drawcard for nuisance species of birds, such as starlings, noting the problems that arise when they roost in street trees causing associated noise and droppings which impact residents and damage neighbourhood amenity.





1ristchurch City Council

We commend the Council for the work being done already around restoring native planting around our waterways, and would like to see this continue. Increased planting on streets and more builtup areas should not come at a cost to this waterway restoration work.

Objective 2.5 Planting sites are selected and designed to enable a tree to reach maturity and minimise conflicts with the surrounding area

The Board thoroughly endorses this objective, encouraging that the work is done now to make our urban forest sustainable and affordable for future generations to maintain and retain.

Objective 3.1 Retain our existing canopy cover

The Board is generally supportive of this objective, provided it is pursued with due thought and is consistent with ensuring the health and safety of residents.

Objective 3.2 Consider trees as critical infrastructure

The Board supports the intent of this objective, though is mindful that there is always the possibility of need for exceptions to be considered due to individual circumstances. Equally it is recognised that sometimes clear uncompromising commitment is necessary to avoid vital goals being derailed by review processes that may be overexploited by commercial or exclusive interests.

Objective 3.3 Care for and maintain trees to extend their life

The Board supports the value of having an urban forest populated by trees of a full range of ages. It values the preservation and extension of the life of important and significant trees. It also recognises the balance to be struck in ensuring that the cost of maintaining older trees is not to the undue detriment of any opportunities to redeploy funding into new plantings if they clearly better achieve the objectives of our Urban Forest Plan.

Objective 4.1 Our communities actively participate in the development of our urban forest and have a deep understanding of its value

The Board supports this objective; it is essential the community is proactively brought on this journey, and appropriately reassured that the Council understands and employs the principle of 'right tree, right location'. It is encouraged that opportunities are considered to also involve community boards in helping communities to perceive that our Urban Forest Plan is their Urban Forest Plan through fostering participation in, and understanding of, it to the maximum extent.

It is important that, to the extent any compromises must be accepted to achieve the benefits of an urban forest, the public can easily find evidence of the careful assessment and reasoning supporting the choices made and principles followed.



Community boards are often the front line for complaints about trees and nuisances that may become associated with them; support for the boards and their residents at this level could be advanced by public information resources on how the Council's Tree Policy integrates with our urban forest plan in clear and understandable terms.

Objective 4.2 We have effective partnerships with iwi, community groups and organisations that contribute to our thriving forest

The Board is fully supportive of this objective, considering it to be the vital bread-and-butter of what we do.

The Board has seen amazing examples of community-led planting initiatives, such as at Papanui Bush, Rutland Reserve, and the Shirley Birdsong Trail. The Board urges that such important examples of partnering with the community may be a source of learning for this process, and certainly that they not be overlooked or overridden, ensuring that there is scope for appropriate flexibility to bring these projects along on the journey, and respecting their ways of doing things with support and a guiding hand.

Objective 4.3 Mana whenua priorities outlined within the Mahaanui Iwi Management Plan are clearly incorporated into planning and actions to promote the urban forest/forest

The Board is supportive of this objective, encouraging opportunities for public education in these respects.

Objective 4.4 Celebrate different cultures through our trees

The Board is encouraged to see this included as an objective, recognising that Ōtautahi Christchurch has historically been populated by a diversity of tree species, reflecting an increasingly multicultural influence.

There is a balance to be struck between species that are most effective for achieving urban forest goals, appropriate elevation of climate resilience and sustainability, and recognition that bringing in a diversity of international species, as well as a cultural narrative on mana whenua associations with trees and forest, will make our urban forest interesting, and therefore engaging for our communities.

Nāku noa, nā

Emma Norrish Chairperson Waipapa Papanui-Innes-Central Community Board



2050 Ecological Vision for Banks Peninsula/ Te Pātaka o Rākaihautū including Port Hills



We believe that conservation is about people. A healthy natural environment is the foundation for everything that is of value to people – food, water, shelter, lood prevention, health, happiness, and creative inspiration.

We want to inspire people to be passionate about the environment around them, to understand it, their relationship with it, and take action to protect and restore it.

The Ecological Vision cannot be realised by one organisation or agency alone.

Collaboration and a collective approach with Banks Peninsula rūnanga of Te Pātaka o Rākaihautū (Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Te Hapū o Ngāti Wheke (Rāpaki), Te Taumutu Rūnanga, Wairewa Rūnanga), agencies, and with other trusts is required.

The Peninsula communities have a history of achievement through working in this strategic way.

This approach will also provide opportunities for collaborations which enhance biodiversity linkages into the city and more widely across the plains. It is our vision to create an environment in which the community values, protects and cares for the biodiversity, landscape and special character of Banks Peninsula/ Te Pātaka o Rākaihautū. To pursue our vision we have adopted eight conservation goals for 2050.

The goals are aspirational but achievable and will be used to guide all conservation management work and result in a substantial improvement in the state of indigenous biodiversity on the Peninsula by 2050.





While biodiversity protection and enhancement is the primary driver for this work, a communitywide effort to realise this ecological vision will contribute towards a prosperous, connected, resilient, and healthy community.

The goals have been identified by the Trustees of the Banks Peninsula Conservation Trust in collaboration with a group of ecologists led by Professor David Norton of University of Canterbury.







Conservation demands robust science. In order to understand where success has occurred and how things might be improved, we support the gathering and dissemination of scientific information that is accurate, thorough, and attributable.

Appropriate evidence-based monitoring of the eight conservation goals will allow us to provide feedback to the community on the success of management actions, and to learn from the results to improve future management. It also assists the community to understand the ecological values of the Peninsula and promotes further work to enhance those values. There is a diverse range of land tenure across the Peninsula and a wide range of groups are involved in biodiversity conservation. It is therefore important that inventory and monitoring is fully integrated across these different tenures and groups, including the residents of the Peninsula and Christchurch city.

Information needs to be stored in a way that is available for everyone to learn from – monitoring should be as much an educational and advocacy exercise as a method to inform management.



Goal 1

All old growth forest remnants (more than 1 ha in area) of Banks Peninsula/Te Pātaka o Rākaihautū forest cover are protected and appropriately managed.

What does success look like?

These remnants are mapped, covenanted (or otherwise protected in perpetuity), fenced, and plant and animal pests are managed. Goal 2

Rare ecosystems are protected and appropriately managed.

What does success look like?

We know what they are and where they are – mapped and recorded. Examples of each rare ecosystem type are protected in perpetuity, and plant and animal pests are managed.

Goal 3

The connections between land, freshwater, and marine habitats are managed to support viable populations of species that depend on them.

What does success look like?

Indigenous species are thriving. An increasing abundance and variety of seabirds are successfully nesting on the mainland. The harbours and bays have large healthy shellfish populations and there is an increase in inanga spawning sites compared to today. The community is actively involved in this work. Goal 4

Four core indigenous forest areas of more than 1000 ha each have been protected.

What does success look like?

The four core areas are mapped, covenanted (or otherwise protected in perpetuity) and fenced. Each area has a plan developed for the collaborative management of plant and animal pests. The community is aware of, and involved in the care of the areas.



Goal 5

Land and freshwater primarily used for production and for settlement also supports thriving indigenous biodiversity.

What does success look like?

Land managers are aware of and protect ecosystems and biodiversity as a matter of course. Periodic mapping and imaging demonstrates that there is an increase in indigenous biodiversity cover across the Peninsula. The whole community is actively involved in projects to enhance biodiversity, such as



Port Hills residents planting and managing appropriate vegetation to develop an ecological corridor (or bridge) from the Peninsula to Christchurch city.

Goal 6

Rare and common indigenous flora and fauna of the Peninsula are increasingly abundant.

What does success look like?

There is robust scientific evidence to demonstrate that species are increasing in abundance and diversity. People are recording anecdotal evidence about healthy indigenous biodiversity in their immediate environment (such as bird song, indigenous vegetation cover and decline in exotic weeds). Goal 7

At least two locally extinct species have been reintroduced.

What does success look like?

There is robust scientific evidence to demonstrate that the populations of the two reintroduced species are healthy and self-sustaining. The community actively nurtures the reintroduced species.



Goal 8

Banks Peninsula/Te Pātaka o Rākaihautū is effectively free of pest animals.

What does success look like?

At the highest level there is robust scientific evidence of an increased abundance and diversity of indigenous species (Goal 6). Pest animal numbers are reduced to a level which enables indigenous species to survive and increase. Protected forest understoreys flourish and are free from grazing by exotic mammals. The whole community is involved in this work.



Submission #50231

Photo credits

- Pg. 1 Totara at Paua Bay Patsy Dart
- Pg. 2 The Monument Kelvin McMillan
- Pg. 2 Wood Pigeon Jonathon Harrod
- Pg. 3 Guided walk at Western Valley Rachel Barker
- Pg. 3 Koukourarata covenantors function Marie Neal
- Pg. 3 Fencers Marie Neal
- Pg. 6 Cabbage tree Jon Sullivan
- Pg. 7 Tutakakahikura Scenic Reserve Shireen Helps
- Pg. 8 Fox & Associates covenant survey Craig McInnes
- Pg. 8 Tui translocation transport & banding Frances Schmechel
- Pg. 8 Tui translocation collaborative work Kay Holder
- Pg. 13 Seals at Red Bay Marie Haley
- Pg. 14 Stock work at Pigeon Bay Pam Richardson
- Pg. 16 Otanerito Marie Haley
- Pg. 17 Traps Marie Haley



STRATEGY FOR A PEST-FREE BANKS PENINSULA / TE PĀTAKA O RĀKAIHAUTŪ

Prepared in 2019 by Pest Free Banks Peninsula Working Group

Revised in December 2022 by the PFBP Project Oversight Group and Project Management Group



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1. INTRODUCTION

Pest Free Banks Peninsula / Te Pātaka o Rākaihautū is a collaborative programme to protect and enhance biodiversity on the Peninsula through the widespread elimination of animal pests. The programme plays a critical role as part of the wider 2050 Banks Peninsula Ecological Vision. As with the other aspects of the Banks Peninsula Ecological Vision, this pest free programme has wider benefits: it supports Ngāi Tahu values, community wellbeing and development, and sustainable agriculture and tourism.

It is a community led initiative, formalised through a Memorandum of Understanding signed by 14 foundation signatories in November 2018. With the Peninsula (including the Port Hills) bordering greater Christchurch, it provides the opportunity for both urban and rural communities, iwi and landowners to be involved in restoring this unique environment.

In 2020 the PFBP partnership was successful in securing funds from national and regional donors, including ECAN and Predator Free 2050 Ltd to undertake a \$10.11 million elimination programme on the Extended Wildside and Kaitōrete. This is a significant step towards eliminating animal predators on Banks Peninsula. Significant progress was also made with eradicating feral goats.

Making Banks Peninsula pest free is an ambitious and aspirational goal. This Strategy outlines what we have achieved so far, what we seek to achieve, the reasons for it and our priorities for the next five years. It is a bold project, with risks and uncertainties that need to be addressed. The strategy will be updated and amended, when necessary, to achieve our vision.

2. OUR VISION – WHAT WE AIM TO ACHIEVE

Our vision is:

Our native plants, birds, animals and insects are flourishing on Banks Peninsula, free from the threats of introduced animal pests. The forests are thriving and filled with birdsong. Native lizards and invertebrates are prolific in the native scrublands and rocky outcrops. Seabirds nest safely in the coastal areas. Species that were previously locally extinct have now been re-introduced and are growing in numbers.

The abundance of native wildlife provides a sense of identity to the Peninsula. It is valued by the community and integrated with farming, tourism and recreational activity. It is known as a special place to live and attracts many local and international visitors. It is renowned as an exemplar of habitat restoration.

For Iwi the vision could be encapsulated in "Ahi Ka". The home-fires are strong. Young people can return home and have jobs based on a vibrant economy which has a foundation of flourishing biodiversity. Taonga species have been returned and kaitiakitanga is actively practised. The mana and mauri of the land is strong. (Note: This section is to be checked by iwi and rūnanga before finalising)

3. OUR MISSION – WHAT WE WILL DO

Our mission is to free Banks Peninsula / Te Pātaka o Rākaihautū from mammalian pests by 2050 through a community led, agency supported, pest elimination programme.

4. OUR PRINCIPLES – THESE WILL GUIDE OUR DECISIONS

Outcome focused: Our choices will be guided by our vision, preserving biodiversity and the related benefits of supporting Ngāi Tahu cultural values, building community connections and a strong economy.

Community led: The programme has been initiated by the community and will reflect their aspirations. Participation is encouraged.

Accountable: Residents and external funders are being asked to support and participate in this project. In return we will be open, honest and accountable for what we do and achieve.

Innovative: Our vision requires innovation: existing methods are not enough.

Evidence based decisions: Good information supports good decisions. We will actively support monitoring and research.

Sustainable: As a long-term project, the effort and funding must be sustainable. The programme must be realistic and underpinned with on-going support from local and national agencies and funders.

5. WHAT WE WILL DO - OUR GOALS AND OBJECTIVES

The Goals and on-ground Objectives of our work are summarised in this section. A full descriptions of each of the Goals and Objectives are set out later in this document.

Goal 1: To progressively eliminate mammalian pests from Banks Peninsula (including the Port Hills) and Kaitōrete, while continuing to protect existing biodiversity.

Objective 1: Eradicate feral goats from the Peninsula by 2024 and develop a control programme for feral pigs.

Objective 2: Eliminate possums from the Extended Wildside by 2026 whilst also suppressing stoats and feral cats.

Objective 3: Commence expansion of Extended Wildside elimination programme by 2026.

Objective 4: At least 3000 households participate in backyard trapping on the Port Hills by 2025.

Objective 5: Possum, rat, feral cat, hedgehog and mustelid populations are reduced to low levels in 1,000ha of the southern Port Hills biodiversity hub by 2024.

Objective 6: Eliminate possums, mustelids, hedgehogs and feral cats from Kaitōrete by 2025.

Objective 7: Develop programmes to support community and landowner efforts through targeted planning and advice.

Goal 2: To support and work effectively and collaboratively with landowners, partner organisations and volunteers to achieve the vision.

Goal 3: To base decisions on good information.

Goal 4: To be innovative and adaptive.

Goal 5: To build delivery and management capacity.

Goal 6: To grow consistent and stable funding.

6. MAPS OF PHASES

(Note: these maps will be updated and the quality improved once Strategy edits are complete)



Phase 1 of Pest Free Banks Peninsula: elimination within the Wildside area and Kaitōrete. Effective control in the Port Hills and Whakaraupo basin.

Note: The goat elimination and possum suppression programmes are not shown in maps


Phase 2: Wildside Elimination Area expanded, Kaitorete maintained



Phase 3: The elimination areas meet the control areas of Port Hills.



Phase 4: Aspirational vision for a Pest Free Banks Peninsula 2050 where elimination has been completed and a buffer established outside the Peninsula.

7. THE PEST FREE INITIATIVE IN CONTEXT

7.1 A diverse landscape

Banks Peninsula, along with Kaitōrete, comprises a mosaic of pastoral and horticultural land, exotic plantation forests, urban areas, remnant patches of indigenous forest, basalt outcrops and coastal habitats on dunes and beaches, cliffs and rocky foreshores. There are areas of successional shrubland in areas previously cleared for farming, now regenerating towards indigenous-dominant vegetation. The Peninsula spans the wild bays in the south and east of the Peninsula to suburban Christchurch on its northern edge. This mosaic of habitats, with its volcanic topography and coastal backdrop, is a landscape rich in biodiversity.

7.2 Rich in Biodiversity

Banks Peninsula has many high value habitats and threatened species. It contains many endemic species (they are unique to Banks Peninsula and found nowhere else in the world).

Much of the original forest vegetation was removed by Māori and early European settlers but patches of original forest remain. This includes beech forest at Hinewai, podocarp forest in the Hay and Mount Herbert Scenic Reserves and Ahuriri QEII Reserve, kaikawaka/cedar forest at Armstrong Reserve, and Palm Gully Scenic Reserve with its southern-most nikau groves.

The rocky volcanic outcrops are naturally rare ecosystems and support high concentrations of threatened and endemic species of plants, lizards and invertebrates. Sea cliffs and rocky shorelines provide habitats for a wealth of bird and marine life, traditionally a major source of mahinga kai for tangata whenua. The sand dune landscape of Kaitōrete is nationally significant and supports rare and threatened native flora and fauna.

The Peninsula is the southern limit for several warm-temperate plant species and the northern limit for a few southern species. Six plant species are endemic to the Peninsula and a further 41 species are classified as regionally endangered or threatened. About 60 invertebrate species are endemic to the Peninsula. Three of the six reptile taxa present are classified as threatened. Twelve indigenous bird species were considered to be locally extinct, although one (tūī) has recently been reintroduced.

7.3 A human habitat

Kaitōrete is the wide shingle spit (5,500 ha) that separates Te Waihora (Lake Ellesmere) from Te Moananui-a-Kiwa (the Pacific Ocean). Extending 25 km from the foot of Horomaka/Te Pātaka-a-Rākaihautū (Banks Peninsula) at Wairewa in the north to Taumutu to the south, Kaitōrete was part of a key travel route for Ngāi Tahu. It proved much easier to access than navigating inland around the swampy edges of Te Waihora, which covered twice the area that it does today. Kaitōrete was an important source of mahinga kai, and is a tribally-renowned source of the endemic golden sand sedge, pīngao (Ficinia spiralis), a fibrous plant used for weaving. In former times, channels were dug from Te Waihora into the spit for tuna (eels) to enter during their migration. The whole of Te Pātaka-a-Rākaihautū (Banks Peninsula) has 5 Rūnanga that are actively involved as kaitiaki.

People live, work and visit Banks Peninsula. Most of the land on the Peninsula is privately owned and agriculture, tourism and the Port of Lyttelton are major economic activities. There are urban areas and lifestyles blocks, especially on the Port Hills and areas closer to Christchurch. It is a recreational destination for many Christchurch residents and attracts visitors from around the world.

For well over 100 years, people have undertaken conservation activities on the Peninsula. This has included weed and animal pest control, fencing, planting, covenanting of biodiversity, and the building of tracks and huts to enable access for both locals and visitors. The 2050 Ecological Vision for Banks Peninsula / Te Pātaka o Rākaihautū (including the Port Hills) developed by the Banks Peninsula Conservation Trust in consultation with the Peninsula community, was part of the impetus for Pest Free Banks Peninsula and reflects this local interest.

8. THE ANIMAL PEST THREAT

8.1 The impact on biodiversity

Introduced animal pests are the major threat to biodiversity on the Peninsula. The future survival of several of the remaining indigenous bird species will only be ensured by ongoing management of introduced predators such as rats, stoats, cats and possums. Smaller indigenous animals, such as lizards and invertebrates, are predated by rats, hedgehogs and mice. Native plants are vulnerable to browsing by larger animals such as goats, deer and pigs, as well as smaller mammals such as possums, rabbits and hares.

With a high degree of endemism, the loss of many of these species on Banks Peninsula would mean extinction. They are found nowhere else in the world.

8.2 Funded Elimination programme

In August 2020 PFBP launched a significant programme of work as part of meeting this strategy. Ratepayer funds from ECAN provided \$3.25 million and Predator Free 2050 Limited funded \$5 million to 2025, along with other sources a total of \$10.11 million.

The focus of this work is in two sites. On Kaitōrete the aim is to eliminate possums, feral cats, mustelids and hedgehogs across ~5000 hectares. On the Extended Wildside the aim is to eliminate possums across ~23,000 hectares and suppress mustelids and feral cats.

The term "elimination" is used as is it more appropriate to a mainland context where achieving "eradication" or zero of the target species is practically impossible due to reinvasion. Elimination means functional extinction of the target species (ie they are in such low numbers that they are unable to breed). Any reinvasion is managed through buffer zones of traps remaining in place and enhanced monitoring that identifies and dispatches individuals quickly.

A team of 15 staff are now actively undertaking these ambitious and complex programmes, alongside the community, iwi and landowners. The two very different landscapes will test our ability to achieve elimination with the tools we currently have available. An Elimination Strategy has been developed and Operational Plans set out the detail of these operations. These plans are overseen by an active Programme Management Group which meets monthly and represents many of the MOU parties. An overall Programme Oversight Group provides governance support. Both of these groups are significant parties to implement this strategy.

8.3 Other control programmes

Historically, animal pest control on the Peninsula was focused on agricultural pests, such as rabbits and hares for land management, or possums for the control of bovine tuberculosis. Today, the emphasis is primarily on biodiversity protection and enhancement.

The full extent of existing control activities is hard to quantify as there are many parties involved. Projects range from agency led Peninsula-wide initiatives through to individuals trapping in their backyards. What is clear is that they are extensive and widely supported by the community who live and visit the Peninsula. Some examples include:

- A multi-party feral goat eradication project jointly led by the Department of Conservation and the Banks Peninsula Conservation Trust with assistance from CCC, ECAN, Rod Donald Trust and landowners. The committee overseeing the work is chaired by Pam Richardson.
- The community trapping programme led by the Summit Road Society which had an estimated 6000 hours of volunteer time spent on trapping on the Port Hills in 2018 and aims to have 4000 households participating in backyard trapping by 2025.
- The multi-party Te Kākahu Kahukura project, covering an area from Kennedy's Bush to the upper part of Whakaraupō / Lyttelton Harbour.
- Targeted programmes to protect areas of high value biodiversity, such as Ōtamahua / Quail Island, Kennedy's Bush, relevant initiatives funded by the CCC Christchurch Biodiversity Fund, and a planned predator exclusion initiative at Goat Point. CCC also has targeted programmes focusing on the Port Hills and other Sites of Ecological Significance on Banks Peninsula.
- Several local community-led local initiatives such as Predator Free Allandale/Living Springs and Rewild Wainui
- The testing of new, innovative technologies, such as the Cacophony Project

While the possum and goat programmes cover most of the Peninsula, the trapping efforts for smaller mammals (such as mustelids, rodents, hedgehogs, and feral cats) are scattered across the Peninsula.

9. THE STRATEGIC ISSUES

The high biodiversity values, many of which are unique to the Peninsula, are threatened by browsing and predation by introduced animal pests. Removing these threats is the primary impetus for Pest Free Banks Peninsula.

Pest Free Banks Peninsula aligns with national and regional priorities and there is demonstrable local support for biodiversity pest control on the Peninsula. This interest has grown significantly following the Government's 2015 announcement of Predator Free 2050, especially among urban residents.

The human presence on the Peninsula creates challenges that do not exist for pest elimination in areas such as remote islands, wilderness areas or fenced sanctuaries. Pest control methods must be safe for this environment and fit with people's values and livelihoods.

The extent of private land ownership means landowner enthusiasm and support is critical, both for permission to carry out pest control operations and for rate-based funding support.

Innovation is essential to achieve the vision. Most existing programmes (with the exceptions of Quail Island and the feral goat project) are aiming at suppression of pests, not elimination. This highlights the

challenge of elimination and what is required to achieve it. Elimination requires effective methods, careful planning and, above all, adaption and innovation. For smaller mammals, the pest-free vision is aspirational: elimination with current tools, techniques and knowledge is neither feasible nor affordable in this environment. Most elimination efforts elsewhere have relied on aerially distributed toxins which, for various reasons, is problematic on the Peninsula. Even on small remote islands, it was innovation and adaption, supported by good monitoring, that led to success. Here, we need to repeat that process to develop new methods suitable to our context, drawing upon expertise both locally and from elsewhere.

Existing funding and capacity is insufficient to achieve elimination, or even a significantly expanded suppression programme to protect existing biodiversity. While the \$10 million programme is a significant and vital start, it is only the beginning.

Even with a significant and growing volunteer base, people and resources are needed for planning, equipment, training and coordination. Without these ingredients, volunteer projects are often ineffective, short-lived and subject to rapid re-invasion. In more remote and difficult terrain, professional contractors will be required, particularly where elimination is the goal.

Currently, monitoring and reporting is generally poor. The reasons for this relate primarily to funding, although complexity, available expertise, long timeframes and the range of organisations involved are compounding factors. The improvement of monitoring and reporting is a strategic issue for this project.

Experience from eradication programmes elsewhere has highlighted the risk of adverse trophic consequences. This can occur when higher-order predators, such as cats, stoats or possums, are removed, allowing reduced pressure on their prey. This can result in unexpected and negative biodiversity outcomes. Hence the need for close monitoring.

The removal of animal pest threats enables other activities relating to the vision. This includes translocation of locally extinct species and greater success with local actions such as restoration planting. Such initiatives are outside of the scope of Pest Free Banks Peninsula but are enabled by it.

10. THE BENEFITS – WHY A PEST FREE PENINSULA IS IMPORTANT

The elimination of mammalian pests from offshore islands and predator-fenced sanctuaries demonstrates what is possible when pests are removed. These areas have played a critical role in preventing the extinction of species and created safe zones into which vulnerable species can be reintroduced. They now have diverse and abundant native wildlife not normally seen by New Zealanders, reminiscent of our indigenous biodiversity when Europeans first arrived.

A pest-free Banks Peninsula will allow indigenous plants and animals to flourish here, free from browsing and predation. Remnant ecological communities will grow and flourish, supported by related restoration efforts, such as the reintroduction of locally extinct plants and animals.

For Ngāi Tahu, kaitiakitanga and mahinga kai are traditional practices. The restoration of native wildlife on Banks Peninsula / Te Pātaka o Rākaihautū (the food store house of Rākaihautū), sits alongside the restoration of Wairewa / Lake Forsyth and Te Waihora / Lake Ellesmere, originally called Te Kete Ika o Rākaihautū (the fish basket of Rākaihautū).

As a community led initiative, the journey and the destination of a pest-free Banks Peninsula are important. Participation connects people with people and it connects people with their environment. In good times, such initiatives provide a sense of shared purpose, belonging and achievement. In times of

crisis, as we have experienced, the connections with others are even more critical: they provide a network through which people communicate and share, helping our emotional, mental and physical well-being.

Pest Free Banks Peninsula will provide economic benefits. Flourishing wildlife is good for tourism, as well as residents. For farming, it removes disease vectors and browsing pests. Funding from external grants contributes to local economic activity and employment.

11. THE GEOGRAPHICAL BOUNDARIES AND SCOPE OF THE PROJECT

Geographically the programme covers the Banks Peninsula Ecological Region (including the Port Hills) and Kaitōrete (shown in Figure 1). It includes public and private and urban and rural land.

Fifteen species of pest mammal will eventually be eliminated by 2050, although not all at once. These are possums, rodents (three species), mustelids (three species), hedgehogs, rabbits, hares, feral cats, goats, deer (two species) and pigs. Domestic and farm animals are excluded from the programme.

Pest Free Banks Peninsula is focused only on animal pests, not plants. We recognise that the control of plant pests is important to protect biodiversity, however, adding plant pests to our programme at this time would be detrimental. It would dilute our focus and resources and add significant complexity and risk. This position may be reconsidered in the future, once the animal pest programme is properly established.

12. OUR GOALS AND OBJECTIVES

The six strategic goals (below) reflect the breadth of work required to achieve the vision. While Goal 1 is the overarching one for on-ground implementation, it cannot be achieved in isolation. All six goals are essential for achieving our vision.

The immediate strategic imperative is to develop and cost operational plans for the proposed priority activities. This will enable the initial priorities to be confirmed and matched to available resources. This planning and budgeting phase is essential to inform decision making and ensure the programme for which we seek funding for is realistic, sustainable and includes all the components necessary for success. As well as the on-the-ground control operations, related activities include management and administration, community engagement, fund raising, monitoring and reporting.

12.1 On-ground actions

Goal 1: To progressively eliminate mammalian pests from Banks Peninsula (including the Port Hills) and Kaitōrete, while continuing to protect existing biodiversity.

The on-ground priorities reflect the need to balance:

- continuing biodiversity protection
- maintaining and growing community support and participation
- affordability and technical feasibility
- achievement of the long term goal of elimination.

Larger animals, such as goats, deer and pigs, can be eradicated from the Peninsula by taking a whole-of-Peninsula approach, utilising current tools and realistic budgets. Eradicating smaller animals is more difficult and costly. Hence we have used the term "elimination". This acknowledges that numbers will get to functional extinction and any reinvasion will be managed. A staged approach will be used, starting on the Wildside and Kaitōrete. These have high biodiversity values, strong landowner support and are relatively defendable against reinvasion. A buffer zone will be created to reduce the risk of reinvasion from adjacent areas. Once elimination has been achieved in the initial areas, the elimination area can be extended into the buffer zones and new buffer zones created. This buffer / eliminate / buffer / eliminate approach would continue to be rolled out in a collapsing domino manner, until it covers the entire Peninsula, including the Port Hills and Kaitōrete. This phased approach to the elimination of small animals is shown in Figures 1 to 4. It does not show the Peninsula-wide elimination programme for goats .

Based on these factors, the **proposed on-ground actions for 2022 - 2027** are reflected in the following objectives:

Objective 1: Eradicate feral goats from the Peninsula by 2024 and develop a control programme for feral pigs.

Browsing by feral goats, deer, and pigs is a significant threat to native plants and habitat and hinders restoration planting (particularly on the Port Hills). Feral goats are the immediate onground priority due to their numbers and community support. Further investigation will be done for deer, particularly on the Port Hills where they are hindering restoration planting following the 2017 fires. Control of pigs focuses on halting their spread and trialing methods for reducing their current range (this includes both trapping and specialized hunting)

Objective 2: Eliminate possums from the Extended Wildside by 2026 whilst also suppressing stoats and feral cats.

Initially possums, feral cats and stoats will be targeted, as these are the most feasible for eradication with existing methods. This will cover over 28,000ha until early 2026, covering the Wildside and part of the Extended Wildside. Rats, mice and hedgehogs will be monitored, and targeted control of rats is planned in smaller areas of high biodiversity value to avoid adverse trophic consequences following the removal of larger predators.

Objective 3: Commence expansion of Extended Wildside elimination programme by 2026.

This is the second phase of the elimination roll-out for possums, *whilst also suppressing stoats and feral cats*. It is expected to commence in the next 20,000 hectare block during 2026 (subject to funding).

Objective 4: At least 3000 households participate in backyard trapping on the Port Hills by 2025.

This is strategically important due to its proximity and participation opportunities for Christchurch residents, especially on Port Hills and Lyttelton Harbour. Ultimately, it will form part of the western boundary between the Peninsula and City and plains. Objectives 4 and 5 focus on suppressing pest numbers, rather than elimination, due to the high risk of re-invasion.

Objective 5: Possum, rat, feral cat, hedgehog and mustelid populations are reduced to low levels in 1,000ha of the southern Port Hills biodiversity hub by 2024.

The Port Hills biodiversity hub consists of public and private land from Kennedys Bush to Governors Bay, Quail Island and Living Springs (now under the Te Kakakahu Kahukura project). The dual aims are to protect and enhance biodiversity and to support local participation opportunities close to Christchurch.

(Note: Objectives 4 and 5 are complementary).

Objective 6: Eliminate possums, mustelids, hedgehogs and feral cats from Kaitōrete by 2025.

Kaitōrete is a priority due to the outstanding biodiversity and cultural values and the on-going threat from browsing and predation. The initial focus is on the western end of Kaitōrete. In addition to possums, mustelids and feral cats, there will be intensive focus on rats and hedgehogs in this area. There will be on-going pest suppression at either end of Kaitōrete to provide a buffer to the elimination area to reduce reinvasion as well as protect habitats and species.

Objective 7: Develop programmes to support community and landowner efforts through targeted planning and advice.

Environment Canterbury's CIP (and earlier Animal Health Board operations) have now been replaced by Pest Free BP's activities and focus. However, it is important not to lose the previous gains made.

Possum numbers are to be suppressed in other areas by supporting community and landowners. In addition to the suppression of possums, we will also provide support to community-based initiatives which target other animal pests.

12.2 Engaging the community

Goal 2: To support and work effectively and collaboratively with landowners, partner organisations and volunteers to achieve the vision.

Working effectively to activate and support landowners, partner organisations, community organisations and volunteers is critical to achieving the vision. Having strong communications is an important part of this and includes PFBP having a communications advisor that works alongside agencies. There is a need to better communicate the revised Strategy to the public, and also to implement an overall integrated communications strategy and communications plan which includes the range of activities which are part of PFBP.

A landowner liaison officer is also employed to relate directly with landowners to ensure permissions and maintaining high health and safety standards.

At the date of this document (December 2022), there are significant resource constraints in this area.

We will also work with the Regional Council in updating and communicating the Regional Pest Management Plan to support the PFPB work.

10.3 Research and monitoring

Goal 3: To base decisions on good information.

Good information supports success. It informs programme design, adaption and innovation. It reduces the risk of adverse outcomes (such as unforeseen trophic consequences) and enables accountability to funders, participants and the community. Research insights can come from the Peninsula or elsewhere. As

a long-term project, we will seek to establish on-going partnerships with research institutions and information sharing with similar initiatives elsewhere in New Zealand.

Monitoring is critical but can be complex and expensive. Ideally, it covers control results (such as pest counts) and outcomes (the state of the flora and fauna), both before and after control operations. It requires systems and processes for data collection, analysis and reporting. It must use suitable and consistent methods to give valid and comparable data, both over time and between sites. A biodiversity monitoring plan has been developed to resolve these questions and ensure monitoring is feasible, affordable and fit for purpose.

12.3 Innovation

Goal 4: To be innovative and adaptive

New tools and techniques are essential if large-scale eliminations are to be achieved and maintained. This includes learning from within the programme, as well as working with innovators from other projects and businesses.

12.4 Capacity building

Goal 5: To build delivery and management capacity

Pest Free Banks Peninsula is a significant step up for pest control on the Peninsula. It is large and ambitious and while the collaborative, multi-party nature of the project gives it strength it also adds complexity. People and systems are needed to lead the project, plan and implement operational delivery, engage with landowners, monitor and report progress, support landowner and local community led work, secure funding, and manage relationships with partners and stakeholders. Funding has been secured for the first 5 years of the programme that employs 15 staff. However, it takes time to develop capacity and experience and we cannot underestimate the challenges involved. Specific needs include additional support for communications and community liaison, and the need for a paid staff member(s) to coordinate/support landowner groups across the Peninsula and the work of SRS on the Port Hills.

Goal 6: To grow consistent and stable funding

Substantial and sustained funding is required to achieve the pest-free vision. Phase One on the Extended Wildside and Kaitōrete has been costed at \$10.11 million and around \$9.1 million has been secured from ECAN (through rates and other contributions) and other funders with matched 1:1 funding from Predator Free 2050 Limited.

The cost of completing the other phases of the Elimination Project is difficult to predict as success is expected to take decades and require new and innovative technology.

In addition to the elimination project on the Extended Wildside and Kaitōrete, there are a range of suppression and control activities which are part of the overall PFBP work including the control of pigs and deer, community based work on the Port Hills coordinated by SRS, Te Whaka Ora, Living Springs, several locally based community initiatives, as well as continuing work by Councils and the Department. There is an urgent need to grow the funding for all these parts of the overall PFBP work.

Volunteer labour and expenditure (such as the purchase of traps) also contributes to the programme, especially in urban trapping areas. The level of activity will be adjusted to match available funding.

13. CRITICAL RISKS

The following risks and primary mitigation measures have been identified as significant. They will be addressed in operational and tactical plans.

Risk	Mitigation
Costs of achieving pest free is too high / technically infeasible.	Adapt and adopt innovative methods to improve efficiency. Re-scope operational priorities if not affordable.
Achieving elimination may require aerial toxins, which may be unacceptable to landowners or other key stakeholders.	Attempt to achieve eradiation without aerial toxins. Seek innovative alternatives.
Some individual landowners refuse to participate, resulting in pest reservoirs within the project boundary.	Early landowner engagement and using local leaders and influencers. Seek regulatory tools, if needed.
Adverse trophic consequences (such as increases in rodents after the removal of possums, stoats or cats).	Monitor and, if necessary, control non-target pest species.
Re-invasion of eliminated areas.	Monitor for re-invasion and deploy rapid response.
Insufficient funding.	Match the extent and timing of the programme to available funding. Seek additional funding as needed. Work with agencies through Long Term Planning to leverage funds.
Control effort is spread too thinly.	Use monitoring data to assess effectiveness and slow down or concentrate effort if needed.
Opposition to the elimination of some pest species (such as feral cats, pigs and deer).	Focus on outcomes and demonstration of the benefits. Match roll-out with levels of acceptance. Use methods that do not target domestic cats.
Difficulties recruiting field team members due to limited local labour market, cost of living increases, time spent traveling and the availability of 'easier' mahi for higher financial reward	Use local channels to advertise positions. Support staff with learning and development. Work with PF 2050 Ltd to index funds against inflation.
Impacts of COVID-19 including supply chain issues	Ensure planning ahead for procurement as much as possible. Pivot to new technologies
Learnings from other projects are not shared and the overall PF 2050 strategy is not built on shared learnings	Continue to lobby major funders (PF 2050 Ltd and DOC) to develop learning systems for all projects to use and share lessons.

14. PARTIES INVOLVED IN THE PROGRAMME

The following organisations are inaugural signatories to the Pest Free Banks Peninsula Partnership Memorandum of Understanding (MOU).

Banks Peninsula Conservation Trust, Rod Donald Banks Peninsula Trust, Summit Road Society Incorporated, Department of Conservation, Environment Canterbury, Christchurch City Council, Ōnuku Rūnanga, Te Hāpu o Ngāti Wheke Rūnanga, Te Rūnanga o Koukourārata, Te Taumutu Rūnanga, Wairewa Rūnanga, Living Springs, Selwyn District Council, and the Cacophony Project.

Pest Free Banks Peninsula is an open partnership and is actively looking to recruit additional community, educational, and business members.

A management structure is outlined in the MOU with a governance level Project Oversight Group supported by a Project Management Group.



Styx Living Laboratory Trust Submission on the Christchurch City Council's Ōtautahi Christchurch Urban Forest Plan

Email - <u>styxllbom@gmail.com</u> Website: <u>www.thestyx.org.nz</u> Facebook: Styx Living Laboratory Trust Cell Phone: 0278123270

Thank you for the opportunity to make a submission on the Ōtautahi Christchurch Urban Forest Plan. The Styx Living Laboratory Trust is thankful for the considerable effort put into preparing the Plan.

This submission has been prepared by members of the Styx Living Laboratory Trust

Summary of the Styx Living Laboratory Trust

The Styx Living Laboratory Trust (SLLT), is a local river care group. The Trust was officially formed in 2002 and has since encompassed a role of guardianship and advocacy for the Pūharakekenui (Styx) River and the biodiversity of the surrounding land as a living part of the Canterbury landscape. The Trust is heavily involved in restoring native vegetation around the Pūharakekenui, having planted 74,000 plants in the last two years. We care deeply about the catchment, and want to build environmental assets for future generations to benefit from.

We would like to formally comment on Christchurch City Council consent application as it affects one of our core visions to achieve a viable spring fed ecosystem, which includes replanting native trees.

General Comments

We (SLLT) are advocates for protecting the health and values of the Pūharakekenui and as such we generally **strongly support** all initiatives which assist with establishing the Pūharakekenui as a viable river ecosystem, including this forward-thinking planting plan.

Commentary

In addition, the SLLT strongly supports the following:

- The overall plan of the council to prioritise and encourage planting trees. We specifically support the targeted canopy cover for waterways, as this is vital to river ecosystem success. Canopy cover over waterways increases native animal abundance, reduces evaporative loss, and naturally controls pest plants; so prioritising it will be a quick win for the city.
- The focus on partnering with community groups and local landowners to accomplish planting goals. This supports local communities, and extends the value of the council's contributions.
- 3. The commitment in objective 4.1 to promote community planting days.

SLLT strongly suggests that Council consider the following:

 Planting native tree species should be more strongly and consistently emphasised in the plan. Planting exotic trees brings long term consequences, such as spreading exotic seedlings into restored areas, and providing resources for introduced birds and insects that native species often fail to benefit from. This is contrary to the plan's goal of providing long term benefits. By contrast, planting native trees will help build a sustainable native bird, insect, and plant community. Currently, most dedicated goals around native plantings are in Objective 2.4, which we feel separates out native planting goals from the broader tree planting effort. These goals should be incorporated into the planting guidelines in section one. Objective 1.1 and 1.2 should include a goal to encourage the planting of native trees over exotic trees wherever native trees would accomplish the same goals.

2. The Trust would like the Council to consider acquiring land along the Pūharakekenui and in the red zone. This will allow high value areas of urban forest to be established early, connecting native planting corridors, shading waterways, and providing continuous habitats for native animals. Additionally, this will improve public access to urban forests and support the completion of a source to sea walkway. Overall, this would be beneficial in relation to the overall health and rehabilitation of the Pūharakekenui.

Thank you for the opportunity to provide comments on the Christchurch City Council consent application.

Urban Forest submission

Some comments, answers to your questions and ideas:

Ecocentric versus anthropocentric

However great this plan, it is a very anthropocentric plan. I can see what you are trying to do, to prove how valuable trees are for humans to get it through and get funding. However, it does perpetuate the idea that nature is there to serve humans (anthropocentric) instead of trees having their own right to exist (ecocentric). The less trees in the city, the less people feel any connection to nature and the environment which is the underlying cause of what got us into this conundrum of climate change and biodiversity loss in the first place. So as a long-term underlying goal you may want to incorporate encouraging ecocentric views towards nature in the plan. (Note: typing this up it is interesting to note that google spelling knows the word anthropocentric but not the word ecocentric).

Lower canopy cover in lower socio-economic neighbourhoods

This is likely due to a higher number of rental properties. Especially for lower priced rentals, landlords prefer grassed backyard (where there are backyards at all) to reduce the work and maintenance costs as tree pruning is a landlord's responsibility and grass mowing the tenants' responsibility. Encouraging canopy cover on private land in such neighbourhoods will be an uphill battle.

Canopy cover and flooding

A higher canopy cover can assist with reducing flooding and should be prioritised in areas that drain into flooding rivers.

Urban forest and intensification

With the current intensification rules, this plan has no chance whatsoever. Anyone looking at the sites currently developed with townhouses will see there is no space whatsoever for trees. Where there would be space neighbours will soon be complaining about shade when houses are close together. With the current intensification this plan is a pipe dream. Paying a contribution to plant somewhere else is not going to help to get the benefits of trees in the community. I am imagining intensification in Hornby gets paid off so more trees can be planted in Cashmere. Is that what we want? Tree planting should not be able to be bought off. Trees are part of any housing development full stop but will also need to take into account shading for neighbours so should only be planted on north boundaries or with a generous set back on west and east boundaries.

Urban forest, intensification and parking

Due to intensification where no garage or off-street parking is constructed as now is allowed, the streets are full of parked cars (e.g. Selwyn St close to Hagley park) and these on-street parking requirements will leave less options for carriageway narrowing to make space for trees in streets.

Urban forest and fibre cables

When notifying the CCC about a tree in a berm that had died (so they could replace it) I was told Enable does not allow trees to be planted near fibre cables and trees in berms once dead would not be replaced anymore. This particular berm was wider than most in Christchurch. As fibre is pretty much under every berm, how are you going to realise more canopy cover in streets?

Trees and active travel

Children prefer travelling by active transport instead of being dropped off by car especially if the environment is pleasant, scientific research has shown. Trees along streets can play a role in increasing active transport to school. In general streets with trees are more pleasant which makes cycling and walking more pleasant and thus encourages active transport. Active transport can play both a role in climate change and inactivity-related non-communicable diseases which costs the health systems billions.

One-way streets and trees

If you turned all/most residential streets into one way streets this would free up space for trees (and associated walking and cycling infrastructure). Plant trees on alternate sides of the road so roads become more winding for speed reduction.

Trees as critical infrastructure

If there are not some very strict rules around this and protection with severe consequences, trees will not be seen as critical infrastructure. There is already a culture of 'it is easier to apologise (and pay the fine) than ask permission'.

Tree planting and community

If you get the community e.g. through schools to plant the trees in the neighbourhood there will be more ownership. Also involve them in maintenance as much as possible. Have explanatory signage on every planting site so the people who are actually there see it and read it.

Trees and children's play

With ongoing intensification and the loss of backyards, public trees become more important for children unless we want a generation that grows up on tablets and phones inside alone. Make trees and shrubbery suitable for children to play. Integrate trees in playgrounds to play in, under, with and create 'wild' areas. It stimulates creativity and invites children to take risks and introduces them to areas that are not human-managed to death. Yes the odd child will fall out of the tree but that is offset against the health benefits of active children.

Ribbons and patches of planted areas instead of single trees

If planted areas are connected in ribbons throughout our city, birds will be more prevalent everywhere in our city. Isolated island cannot be reached so easily. For birds to thrive they will need a patch of trees as birds need darkness. Single trees (however abundant) in an intensified city with lights everywhere will not be an environment where birds can live.

It's a lovely plan. Good luck, you'll need it.

6 March 2022

Ann Tomlinson Ōtautahi Christchurch Urban Forest Plan Christchurch City Council Feedback provided via email: ann.tomlinson@ccc.govt.nz

FEEDBACK ON THE OTAUTAHI CHRISTCHURCH URBAN FOREST PLAN

Ōtautahi Community Housing Trust ("OCHT"), at the address for service set out below, thanks Christchurch City Council for the opportunity to submit on the Ōtautahi Christchurch Urban Forest Plan "Urban Forest Plan"). This letter provides the substantive detail of OCHT's submission on the Urban Forest Plan. It is noted that the substantive submission points also reflect matters raised by Kainga Ora Homes and Communities.

Background

- 1. OCHT was established by the Christchurch City Council in 2016 to manage Council-owned social housing as well as social housing owned by the Trust. This application represents the Trust's objectives to improve the quality and increase the supply of community housing in Christchurch.
- 2. OCHT is the largest non-governmental social housing provider in the South Island. It is a registered charity and a community housing provider. OCHT successfully transitioned a social housing portfolio of approximately 2,300 properties and tenants in October 2016.
- 3. As a Social Landlord, "OCHT's focus is on tenant-centric service delivery, sustainable tenancies and improved property management services".
- 4. OCHT deliver a minimum of 50 new social housing units per year in Christchurch and Banks Peninsula.
- 5. The proposed homes meet the OCHT goal of providing warm, dry and healthy homes and have been designed to the New Zealand Green Building Council's Homestar 6 standard.

Outline of Submission on the Urban Forest Plan

- 6. OCHT thanks the Council for the opportunity to provide submission on the Urban Forest Plan.
- 7. In particular, OCHT supports:
 - a) The Council's recognition of trees as a key element in successful urban environments.
 - b) The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 ("NPS-UD")

- c) Strongly support CCC increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. In the 1990early 2000s CCC ran a very successful 'Neighbourhood Improvement Programme' that focussed on streetscape renewal in medium density zones. These included the replacement of deep-dish kerb and channel, undergrounding wires, and the introduction of street trees and street calming initiatives.
- 8. However, analysis of the Urban Forest Plan has highlighted several matters that OCHT considers could compromise the intensification of housing and the planned urban built form that is envisioned by the NPS-UD and the associated Housing Supply Act.
 - a) OCHT supports the implementation of the intensification provisions of the NPS-UD and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (the Housing Supply Act) and ensuring planning decisions contribute to achieving well-functioning urban environments. OCHT consider the requirements to achieve 20% tree canopy cover is inconsistent with the spatial outcome requirements set out in the NPS-UD, and the Medium Density Residential Standard (MDRS) provisions of the Housing Supply Act. The tree canopy requirements in the Urban Forest Plan present an unrealistic application to more intensive housing forms/ areas – in short, you cannot deliver both medium density housing and have 20% tree cover on private land.
 - b) It is considered that the starting base position of 20% canopy cover in the Urban Forest Plan is an unrealistic target and unrealistic comparisons have been made to Auckland and Wellington given the topography, climate variances, and pre-settlement vegetation cover between these cities and Christchurch. The UFP notes that current tree cover is only 15%, however this includes the extensive plantation forests at Bottle Lake, Mcleans Island, and Cashmere i.e. it is not <u>urban</u> forest cover. The report underlying the measurement of canopy cover notes that 65% of tree cover is located in rural and open space zones i.e. of the 15% total canopy cover, only a third is located across the urban areas of the City¹.
 - c) The unrealistic comparison is self-evident in the Urban Forest Plan which identifies that the only suburbs that are currently achieving 20% cover are Cashmere and Fendalton both suburbs with larger than normal sites and geographic features (Bike Park forest and Riccarton Bush and waterways respectively) that provide space for additional planting. It is wholly unrealistic to expect a medium density suburbs such as St Albans or Linwood to deliver canopy cover equivalent to Cashmere or Fendalton as the built forms and underlying topography are fundamentally different.
 - d) The Urban Forest Plan should genuinely be a plan for the urban parts of the City i.e. the starting point should be an accurate estimate of the canopy cover of urban areas, with a target for future years set at an appropriate level for urban areas that is consistent with a growth management strategy of accommodating growth through intensification.
 - e) The Urban Forest Plan defines tree canopy cover to be trees which are 3.5m and over, and notes that it excludes many of the tree planting projects that have been

¹ <u>https://ccc.govt.nz/assets/Documents/Environment/Trees/Urban-Forests/Christchurch-City-Canopy-Cover-</u>report-2018-2019.pdf, para.4.2.2, page 7

undertaken in the five years prior. Much is made in the Urban Forest Plan of how measuring canopy cover helps us to understand our urban forest. By excluding planting that has occurred in the past 5 years, the data that has been used to inform the canopy cover targets is misleading. For example, the figures provided on the decrease of tree canopy cover between 2015/16 and 2018/19 are used to highlight "a trend of declining canopy cover", but do not provide any consideration in the increase in regeneration planting that has occurred in the past 5 years, particularly associated with multi-unit residential developments. The 2018-19 report likewise notes that the decline identified between the two periods should be treated with caution, and is largely caused by harvesting of plantation forest in Bottle Lake and following the Port Hills fires i.e. the provision of more housing is not the leading cause of canopy reduction.

- f) There is minimal acknowledgement of the potential negative effects of large trees (leaf drop, root systems, building safety, unusable land (which still gets rated), loss of access to sunlight, maintenance costs.
- g) The Urban Forest Plan provides no incentives for property owners to retain trees, but rather seeks to penalise people if they don't plant more.
- h) In terms of loss of access to sunlight, it is noted that the Council proposes to introduce Sunlight Access as a qualifying matter in Plan Change 14 to the Operative District Plan, thereby modifying density standards in a manner that it considered "best achieves an equitable outcome to sunlight access when compared to an Auckland context – the MDRS baseline". The requirement to include 20% tree canopy cover would in reality reduce access to sunlight for future residents and is therefore inconsistent with the main intent of the proposed qualifying matter.
- i) A key principle of the Urban Forest Plan is that trees are grown in locations that allow them to reach maturity and benefit the local environment, and appears to heavily rely on IMPs which reference Mahinga Kai and indigenous biodiversity, however the planning provisions proposed in the draft Christchurch Plan do not encourage the planting of indigenous trees, but rather fast-growing exotic species.
- j) The Urban Forest Plan fails to acknowledge the high biodiversity and ecosystem services values of smaller shrubs and plants – but focuses on a tree canopy. For example, it seeks a 75% tree canopy cover for waterway areas, when it would probably be more practical to promote smaller shrubs and plants that better restore waterway health.

Draft Financial Contributions Rule – Tree Canopy Cover

- 9. OCHT is opposed to requiring Financial Contributions ('FC') for 'developments that do not achieve the proposed 20% tree canopy on development sites'.
- 10. In principle, FCs are a tool or mechanism to enable Council to take money at the time of development to pay for (or mitigate) the effects of that development. FCs in the past have typically been used to facilitate localised infrastructure upgrades such as intersection signalisation or sewage pump station upgrades, where such are both necessary to mitigate the additional effects/ demand of a development <u>and</u> are not already programmed to be

undertaken through Council's Long Term Plan (and are therefore already funded through Development Contributions ('DCs') and/or rates).

- 11. In this instance there appears to be no nexus between the FC and the environmental effect it is to mitigate. Landscaping provisions under the Operative District Plan and the draft provisions of Plan Change 14 are required for at least 20% of sites under the MDRS. A separate rule on tree planting was not considered by Parliament to be necessary to provide an acceptable urban environment. Development of these zones in accordance with the zone rules cannot therefore generate an environmental effect that warrants mitigation. The proposed FC does not therefore appear to have any nexus between the environmental outcomes anticipated in the MDRS and the need for mitigation.
- 12. In a strategic sense, Council is pursuing an approach to urban growth management primarily through intensification (as opposed to greenfield expansion). No new greenfield areas have been rezoned since the Land Use Recovery Plan in 2012 a decade or so ago. No plan changes to rezone additional land are currently being progressed by Council. Whilst the Amendment Act has further enabled intensification, this does not constitute a change in strategic direction for the Council growth through intensification has and continues to be the preferred growth management approach.
- 13. The effects of intensification on amenity and tree cover have therefore been anticipated for a decade or more. Council has been taking DCs (and before them reserve contributions) from infill development for at least the past 30 years to fund the acquisition of new open space to meet the additional demands generated by new growth. The effect of pursuing a growth management approach of intensification carries with it an obligation to appropriately anticipate and fund the infrastructure necessary to support that growth. This includes both network infrastructure such as roading and three waters, and also 'soft' infrastructure such as community facilities, and arguably trees in streets and parks. This is a business-as-usual expense whereby land for such planting already exists in the form of road reserves and existing open spaces, or is provided through DCs to fund new open space acquisitions. If the Council's preferred strategy for managing urban growth requires additional tree planting in public spaces, then this should (and to a certain extent already does) form part of the LTP process.
- 14. The Forest Plan is silent on the financial contribution calculations, however the proposed formula for calculating the FC contained in the technical information supporting Plan Change 14 to the District Plan, is based on one tree resulting in a future canopy of $113m^2$. Whilst not explicit, it is assumed that this figure is based on a tree with a canopy radius of 6m, resulting in approximately $113m^2$ of total canopy area ($A = \pi r^2$). If this is the case, then a simpler formula would be to require 1 tree to be planted per $100m^2$ of site area, as an easier compliance threshold than a trigger of 10% of future canopy cover.
- 15. The FC formula provided for the draft Plan Change is proposed to be made up of two separate elements. The first element is \$2,037+gst to cover tree planting and maintenance. The second element is to cover the land purchase cost to enable Council to acquire land for tree planting. The cost of the land acquisition element is land value x 50m² per tree. On the basis that land value in residential areas in Christchurch averages around \$800/m² (\$400k for a 500m² section) the FC per tree will run to over \$40,000. To put that into context, the cost of being 1 tree short in a development is more than <u>four times</u> the Development Contributions payable per residential unit and that covers the costs of <u>all of the following matters:</u> 3-waters reticulation, roading upgrades, public transport, cycleways, community facilities, and regional parks, and local parks.

- 16. OCHT has significant concerns regarding the use of FC as outlined in the draft provisions for PC14 as a tool once notified, the proposed Plan Change has still to go through its own process and feedback and subsequent submission have and will raise real concern with this aspect of PC14. This aspect should be removed from the Urban Forest Plan as an implementation tool until such time as the PC14 process has concluded. The Urban Forest Plan should instead focus primarily on CCC moves that can be made on CCC land streets, parks, wetland/ natural areas.
- 17. Given that Council already owns extensive areas of park and open space land (including several thousand hectares of land on the Port Hills and Red Zone), in addition to extensive road reserve and local park areas, and given that Council takes Development Contributions for new parkland as part of any new development, the need for the land component to form part of the FC appears to be particularly hard to justify. Where DCs are taken for local parks, such parks invariably contain extensive tree cover, as amenity tree planting is readily compatible with passive recreation activities.
- 18. The need to provide rapid canopy cover potentially creates a perverse incentive to plant faster growing exotic species rather than natives. The proposed FC could therefore result in a decline in biodiversity by driving developers to plant exotics over natives, with attendant adverse biodiversity outcomes, which is contrary of the desire in the Urban Forest Plan to seek diversity in tree species.
- 19. Whilst supporting the general outcome of tree planting across the City, the current methods of DCs paid for at time of development and used for open space acquisition, in combination with business as usual rates to support Council's preferred growth management approach and District Plan zone-based policy and rule frameworks that guide anticipated built outcomes, are considered to be more efficient and effective than the proposed FC framework.

Key Summary of Submission

- 20. OCHT welcomes the Council's recognition of trees as a key element in successful urban environments. This aligns with our internal landscape design guides which inform all our projects and the need to integrate landscaping with housing.
- 21. OCHT strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. Such renewals should include kerb and channel replacement, undergrounding of overhead wires, and street tree planting.
- 22. OCHT does however have concerns with aspects of the plan regarding having a 20% target that is fundamentally unachievable in medium density environments on private land, and with the reliance on Financial Contributions in PC14 as an implementation method when this FC has yet to be tested through submissions and hearing processes.
- 23. Should you have any questions in relation to the matters outlined above, please do not hesitate to contact me.

Dated 6/03/2023

Ed Leeson

General Manager Property and Development National Planning, Urban Design and Planning Group Ōtautahi Community Housing Trust

ADDRESS FOR SERVICE: Ōtautahi Community Housing Trust PO Box 53 Christchurch 8013 Email: ed.leeson@ocht.org.nz

Comment on CCC Urban Forest Plan (first draft)

We commend the CCC on taking planned action that will reduce our carbon footprint as a city and make the city a more healthy place to live.

We commend the plan for setting canopy cover targets that specifically recognise the importance of waterways as an ideal place to plant trees. (Goal1) Our experience in developing the Laura Kent Reserve beside the Ōpāwaho Heathcote has been that larger trees create canopy which is beneficial for shading the river, provide bank stabilisation, encourage bird and insect life by providing a corridor of cover, and not least provide a place of peace and refreshment for citizens. We have had numerous comments from citizens about the importance of such places in their lives. Development of plantings along waterways is an obvious place to increase tree coverage with clear benefits.

We commend the plan for seeing the importance of involving local community in both planting more trees, but also in the longer term care and maintenance of planted areas. Our experience as a group that cares for the Laura Kent and Connal Reserves has been that local input is vital in keeping planted areas maintained and free of rubbish and invasive weeds. Research indicates that trees planted by human neighbours will live longer than those planted by council contractors. Creating local relationship with trees by naming them and creating 'story' around them will maximise benefits of tree planting.

We commend the plan for addressing equitable tree cover for all suburbs. People in well planted neighbourhoods breathe easier.

We would make the following observations and comments:

- 1. The emphasis on planting native species is not strong enough. (Goal 2: Nurture) We note that the Lower Ōpāwaho Heathcote Guidance Plan was not one of the documents consulted. In this plan adopted by the CCC it was strongly advanced that exotic species should be replaced with native species along the river to provide a good corridor for birds, insects, and other fauna to thrive. The planting of native species create richer communities of life, than planting exotics.
- 2. We note the emphasis of planting trees along waterways (Goal 1: Plant, also Obj2.4), but would like to see this specifically given more emphasis in actions. Eg: establish a native river reserve corridor for tree planting along the major rivers of our city. We note the very disappointing loss of opportunity for planting lost when the Kennaway Industrial Park was recently developed and a substantial natural reserve beside the river was not established. We also note that residential sections beside the rivers may well become redundant through sea level rise and should be utilised for tree planting.
- 3. We do not see mention of historic records and data that would give guidance on which species thrived in areas of Christchurch. (Goal 2: Nurture) Surely this is important when making decisions about new planting. In our work of planting the Laura Kent Reserve this research data was invaluable.
- 4. Large canopy trees are very important, but so are smaller trees which often provide food and shelter for a diversity of insects and other fauna. For example, smaller coprosmas may not provide shade but they will provide berries for birds and cover for lizards. We would like to see more emphasis on the importance of a diversity of tree size. (Obj 2.3, 2.4)
- 5. If involving local community in planting and more importantly ongoing maintenance is important (and we think it is vital) we think the plan should address more clearly how this might

be done. Objective 4.1 should include action to provide committed staff time to nurture partnership relationships. Our group has found the input of our local Parks Ranger vital to give advice and guidance.

6. Other strategies designed to enhance the value of trees and protect them should be considered. (Goal 3,4) The reality is that general knowledge about trees and their importance and sacredness is very low. Protection orders may help, but we have to find ways that build relationship with trees. On-line resources to educate will help, but other creative means will also be required. Strategies our group have tried are naming trees and trying to tell 'stories' about them using QR codes to link to online resources.

Laura Kent Reserve Workgroup

Submission on the Urban Forest Plan: Victoria Neighbourhood Association Inc, 2 March 2023 c/o <u>vnachristchurch@gmail.com</u> 03 3669076

Introduction

- The Victoria Neighbourhood Association, one of seven residents' groups in the Central City, currently has 181 financial members and 43 "associate members". Its boundaries are Colombo Street, Salisbury Street, Victoria Street and Bealey Avenue. The neighbourhood consists mainly of narrow, one-block long streets, with small sections and an increasing number of multi-unit developments. Gracefield Avenue has a grass verge with trees, although more than one-third of them have split or had to be removed for other reasons over the past few years. They have not been replanted.
- 2) This submission was produced by a team of six members, with feedback from the wider membership. The main points were endorsed at a meeting held on 20 February.

General comments

- 1) We <u>are impressed</u> with the concept and detail of the Urban Forest Plan. It is one step in mitigating some of the effects of current and proposed intensification, and it acknowledges the impact of the built environment on climate change (e.g., the effect that loss of even small pockets of open space has on run-off and flood prevention.
- 2) We <u>appreciate</u> the clarity of the consultation document, including the obvious / logical relationship between the Goals, Targets and Actions.
- 3) We <u>agree with</u> the four Principles and the four Goals.
- 4) We <u>encourage</u> the City Council to <u>Integrate the concepts of a "sponge city"</u> into the Plan, with an additional Action "to calculate Christchurch's 'sponginess' percentage rating and determine appropriate steps to increase that percentage within a specified timeframe".
- 5) We <u>support</u> many of the Actions, but some are not ambitious enough or the time period for implementation is too long, e.g., targets related to trees on streets and commercial/industrial sites. Some of the other Actions focus on *investigating* or *assessing*, without a follow-up Action signalled.
- 6) Because of the intensification rules brought in after the earthquakes (i.e., one dwelling for every 200m² in the Central City), there is now very little space for larger trees on most sites. We therefore believe the following three actions should be a priority: (i) more trees planted on streets (ii) more specific incentives for developers to keep as many trees as possible on private land, with corresponding disincentives for removing them and (iii) corresponding incentives and disincentives for removing trees on commercial/industrial sites, especially near residential zones.
- 7) <u>We agree</u> it is much easier and quicker to <u>maintain</u> current trees than it is to plant new ones and wait for them to grow.
- 8) We <u>agree</u> that the Urban Forest should be as equitable as possible across the city. Too often, lower decile neighbourhoods are bare, with few trees to soften the environment. Many residents are either renting or cannot afford to landscape the site they own.
- 9) We <u>urge</u> the City Council to ensure all actions, incentives and regulations are specific and significant enough to make a real difference, e.g., the proposed Financial Contribution must be high enough and inflation-proofed, so it acts as a real deterrent to clearing an entire site and/or removing any mature trees that could be incorporated into the design or worked around. The recent example of a large grove of mature trees removed by a subdivision developer in Ilam should not be allowed ever again.
- 10) We <u>urge</u> the City Council to treat trees like any other valuable and vulnerable asset. This means thinking of anything and everything that could encourage more trees, both by maintaining the ones we have a planting more. <u>Examples</u> of "out of the box" ideas are (i) a rate rebate of, say, \$50/year for every tree over a specified height located on private or commercial land (ii) cost-sharing scheme for residents able/willing to pay for or subsidise additional trees on neighbourhood streets (iii) higher rates in "leafy suburbs" to subsidise tree planting and maintenance in other neighbourhoods and (iv)

put as many trees as possible on the Protected Tree list, so everyone starts thinking of trees as precious commodities.

11) <u>We have identified</u> several outcomes of intensification in our neighbourhood which work against the Urban Forest Plan, particularly related to multi-unit developments: (i) existing trees removed to maximise the number of very small units on the sites, even when at least one could be saved (ii) good topsoil removed, presumably sold for profit (iii) artificial grass used on what little outside space is left, making it impossible for owners/renters to plant anything (iv) the (few) small shrubs or trees that are planted are not maintained by short term renters, property managers or Airbnb visitors and (v) paths are made of concrete, not available permeable material that can assist with rain run-off.

More specific comments on the Goals and Objectives

1) Goal 1 Plant: <u>Agree</u>, with particular interest in 1.1 (grow and maintain canopy cover), 1.2 (equitable planting across the city) and 1.3 (trees on the streets/roadways).

<u>Disagree</u> with the targets for (i) Street planting—9% by 2030 and 15% by 2070 not nearly ambitious enough, for reasons given below and (ii) Commercial/Industry—at 5% and 10% respectively it's almost not worth doing. Both need to be much more ambitious and shifted from "encourage" to "require". Given the current and planned intensification, there is less and less space for mature trees on most residential sections in the Central City. Other neighbourhoods will soon be affected as well, so planting on streets and on commercial sites becomes even more important.

- 2) Goal 2 Nurture: <u>Agree</u> with this Goal and Objectives.
- Goal 3: Protect: <u>Strongly agree with this Goal.</u> Additional comments on each objective: <u>Comments on 3.1 (Retain our existing canopy cover):</u>
 - Our neighbourhood has undergone significant re-building since the earthquakes. We have many examples of developers clearing entire sites, even when possible to save at least some mature trees.
 - We <u>AGREE</u> with the statement that ..." *unlike most assets, a mature tree is not able to be replaced like for like".* However, current regulations are not strong enough to ensure that <u>any</u> mature trees on private property are saved.
 - It is possible to save trees and incorporate them into the overall design, as shown in this photo of a 6-unit development at 27 Gracefield Avenue in 2021.



On the other hand, in January 2021, Williams Corporation

removed <u>all the trees</u> on the corner of Colombo and Salisbury Streets, despite the VNA contacting them about saving at least the tree closest to SoHo Apartments to signal the start of the City Central Residential Zone extending from Salisbury Street to Bealey Avenue. They refused, saying *"there is no requirement to maintain any trees at this location"*. Please note that when their consent was first granted, the development was a <u>commercial</u> one. At some point soon after, it changed to <u>residential</u>, which we understand means there should have been a greater percentage of land used for planting.



Before (2020)

After (2021 - 2023)

• <u>Disincentives</u> to removing trees also needed—incentives are insufficient for the shift in thinking that is needed. The recent example of a "mature forest of trees" (Press article, 25/2/23) being

removed—legally—from a Clyde Road residential property should not be allowed, given all we know about the importance of trees. The Urban Forest Plan needs to be strengthened in every possible way to address this.

Comments on 3.2 (Consider trees as critical infrastructure):

- This should not be disputed. Every mature tree lost reduces not only protection from water runoff, but also all the other benefits. Is short-sighted to ignore the importance of trees by pandering to developers and others who (usually for their own financial benefit) do not factor effects on climate change and amenity into their bottom line.
- Trees should be treated as a valuable, vulnerable and unique resource, supported by strong, unequivocable legislation.

Comments on 3.3 (Care for and maintain trees to extend their life):

- This is also a no-brainer. Yes, we should maintain as many healthy trees as we can, rather than let them deteriorate or be removed unnecessarily. It takes much longer and is more expensive to plant new trees in their place.
- An example from our neighbourhood: There is one tree-lined street (Gracefield Avenue). In 2010, the City Council put a plan to residents about removing what staff identified as trees 'beyond their use-by date" and replant with a different species. The work was ready to commence, but interrupted by the earthquakes. Residents reminded Council in 2019 and every year since, but no action yet. Several trees have split or died in the meantime and have been removed. None replanted. See photo under Actions 3.3, below
- We are concerned about how many other places this could also be happening. Maintenance and replanting when needed are essential provisions in the Plan.
- 4) Goal 4 Involve: <u>Agree.</u> Partnerships have proven to be effective, including in our neighbourhood. The VNA initiated the creation of a pocket park on Durham Street (Aldred Reserve) and is still actively involved in its use and maintenance. We believe there are additional ways to involve residents (covered under Actions, below).

Action Plan comments

- 1) Actions for Goal 1 Plant
 - 1.1 <u>Support</u> the actions listed, in particular we strongly support:
 - "Significantly increase tree planting on Council land to meet our annual planting requirements": Very important and a good place to start, given it does not require encouraging/requiring someone else to do something. Unfortunately, there are examples around the city of trees being removed on Council land. See photos below

<u>Suggest</u> looking at the Otautahi Community Housing complex on Conference – Salisbury Streets (Airedale Courts), which includes vacant sites on the Salisbury St frontage and open space between there and Conference Street. <u>Perhaps fruit trees which residents could enjoy?</u> *Photos of more trees lost at 59-63 Salisbury Street (CCC-owned social housing)*



In 2017, when damaged housing demolished



After agreeing to a temporary carpark

• *"Ensure the Urban Forest Plan's canopy cover targets are considered in all Council projects and planning documents".* Agree, provided "*are considered*" is translated into action

- *"Replace trees that are removed with a <u>minimum of two trees</u>...." Excellent idea, but there needs to be sufficient space for at least two reasonably-sized trees, otherwise the roots won't have space to grow and the trees will be stunted and unhealthy—current and likely intensification requirements are going to work against this.*
- *"Investigate ways Council can incentivise and support private and land owners to retain and plant more trees".* This needs to go further than 'investigate' to give more teeth to the Action re new developments (see comments re Financial Contributions below). Also needs to explicitly state this covers <u>commercial/industrial sites</u> as well (assuming it does) and to include <u>effective disincentives</u> to removing trees as well.
- *"Establish requirements for new development sites to have a minimum of 20% projected canopy cover onsite or pay a Financial Contribution (FC) to Council for planting to occur elsewhere".* We supported this in our Tree Policy submission, but there is an urgent need for this Action to be strengthened.
- We therefore <u>suggest</u> (i) there is a high threshold <u>before a developer is allowed</u> not to meet the 20% cover (ii) all Actions are supported by regulations and incentives that <u>ensure</u> <u>mature trees are kept</u> if at all possible (iii) the <u>FC is significant enough to act as a deterrent</u> to clearing the site (iv) the FC is <u>relative to the site</u> in size, valuation or other criteria, i.e, develop a formula that takes into account what is being built and the likely profit from that build (v) the <u>FC is inflation indexed</u> and (vi) if an exemption is obtained through the FC, the <u>substitute trees are planted as close to the original site</u> as possible. See photos of William Corporation site, with all trees removed, above. How high would the Financial Contribution have to be before they would have saved at least one tree?
- Other issues that will need to be addressed by appropriate Actions are: (i) For multi-unit developments designed either for Airbnb or very short leases, renters seldom are in a position to look after any planting, let alone new trees that need to be watered (ii) Artificial grass is used in most cases (iii) Developers often remove good topsoil, presumably to sell for profit and rarely enrich the poor soil that is left to give plantings the best start possible. *Artificial grass on the only outside space in a multi-unit development in our neighbourhood, 2020*



 We <u>note</u> there is no action the explicitly includes <u>commercial/industrial sites</u> (only the one to 'investigate' how to increase trees on 'private land'). It is unclear whether 'the 20% canopy and Financial Contribution' action includes commercial

sites, which we assume it does. <u>Suggest</u> adding Actions specifically aimed at commercial developments.

- <u>Support</u>, but question whether "Target new planting projects in areas with low canopy cover" (2024-2026) actually means <u>doing</u> something or just <u>identifying</u> possible projects. Need to start planting projects as soon as possible.
- 1.3 <u>Needs to be strengthened and more specific.</u>
 - <u>Planting on streets</u> could make the most difference of any Action, especially as intensification results in a greater number of very small residential units. Actions are not sufficiently action-oriented for such an important Objective.
 - Both Actions refer to <u>developing</u> a plan, not taking concrete actions, with appropriate targets for making a real difference.
 - <u>Businesses</u> also need to up their game when it comes to landscaping—not just a few small plants that are soon scraggly, vandalised or otherwise removed.
 - If CCC is still requiring or encouraging commercial developments in the Central City to <u>build</u> <u>right up to the footpath</u> and cover most of the site, this has to stop. We note that the

amended PC14 includes a Policy in High Density Residential zones that "locates building bulk towards the frontage of sites, enhancing the street wall". This will leave no space for <u>trees</u> to enhance residential amenity, given that much of the Central City has little space for trees on streets.

2) Actions for Goal 2 Nurture

<u>Agree</u> with the Actions for each of the Objectives. The quality and type of trees planted are important considerations. An example of choosing an inappropriate species are the trees in planters on Victoria Street. They are too fragile for such a busy street and, being deciduous, they end up providing none of the visual benefits of trees in winter. However, using planters is a clever way of adding trees on streets where buildings come right up to the footpath.

3) Actions for Goal 3 Protect

3.1 Strongly support both Actions. In addition:

- The <u>regulatory tools to protect existing trees</u> on private land need to be as strong as possible so owners find it easier to comply than seek an exemption.
- <u>Retention of mature trees needs to be the "default position"</u>, not something owners / developers can opt out of through FCs or other ways. There are too many examples of both private and commercial developers removing <u>all</u> trees, just to make it easier to move equipment around and/or to squeeze in a few more units or square metres to the build. If they <u>had</u> to retain trees, they would find a way to do it. *See Williams Corp photos, above*
- 3.2 <u>Strongly support</u>, provided the Design Standard has teeth.
- 3.3 <u>Strongly support</u> the importance of a tree maintenance programme, including replacement of trees when needed (see example from our neighbourhood, above). A regular tree maintenance programme would be good, provided it was followed through and the cost of maintenance and upgrading is a given, not included in the Annual Plan as "nice to have if we can afford it". **Gracefield Avenue tree in poor condition, 2017**



3.4 <u>Concerned</u> that if immediate and effective Actions are not implemented now, even the "leafy suburbs" are likely to disappear or be compromised through intensification and/or neglect.

4) Actions for Goal 4 Involve

- 4.1 <u>Unsure</u> if the proposed actions will have much impact. Would rather have <u>all actions</u> directed at planting and maintaining trees as a top priority.
- 4.2 <u>Support partnerships.</u> In addition, <u>suggest considering</u> (i) voluntary cost-sharing scheme with residents (ii) rate rebate for trees over certain height and (iii) higher rates in 'leafy suburbs" to subsidise planting in other areas. *See General Comments for details*

Personal submission on Our Urban Forest Plan – for **Ō**tautahi Christchurch

by Ashley Campbell

Thank you for the opportunity to submit on Christchurch City Council's urban forest policy. Given the times in which we live, it is essential that we grow and nurture more trees in our city – and retain those we already have.

In general, I agree with much of the plan and its intention. There are some areas, however, where I feel it could be even better.

1. Genuinely prioritise green infrastructure

It's one thing to say the plan prioritises green infrastructure, it's another thing to do so. For example, on page 5 the plan states "mature tree roots can damage nearby infrastructure such as footpaths and underground pipes, however, this can be avoided through improving both the design and the tree species selected".

Let's turn that around – (new) footpaths and underground pipes can damage mature tree roots and trees, so we should avoid this through tree-friendly design. Obviously, this is less easily done when talking about existing pipes and footpaths, but even then, it is entirely possible, when they need repairing, to replace footpaths in a way that accommodates existing trees. Let's put the trees as the first priority, and plan around that. Let's ensure that, wherever possible, the grey infrastructure fits in with the green.



2. Plan holistically – trees with everything!

On page 13 the plan states "we need to take opportunities to embed development of our urban forest into urban design". Yes, we do. We must. And there is no reason to wait – this can happen now, not just in the future.

Evidence strongly suggests street trees help to slow traffic. So, when implementing safe speed neighbourhoods, include an analysis of where street trees can be added, and then add them. In my own suburb of North Linwood we have very wide residential streets. As this neighbourhood is set to become a safe speed neighbourhood, it's a perfect opportunity to shape those streets with trees and defined parking. Don't do these projects in isolation – get the team working together to make the best of such opportunities. Include this in the plan – but don't wait for the plan. Do it now.

3. Tree diversity – including natives

On a personal note, please no more silver birches! Christchurch has one of the highest allergy rates in the country, and for a lot of us these trees are the bane of our existence!

However, as the plan does include exotic species I'd like to urge you also to consider more variety in native trees, including those that may not be endemic to this area. They are still part of our national

culture, and are just as appropriate for non-restoration plantings as, for example, oaks or elms, which are from places far away.

Restoration planting clearly requires that only locally endemic trees are planted, but I see no need or reason to apply this to street and park plantings. For example, the pōhutukawa in New Brighton are stunning (right).



I think much of the "boring natives" narrative happens because of the limited number of species that are planted. I'd like to see more use of our ornamental natives, some of which are endemic to this area but seem seldom planted on public land. Kowhai is popular, but what about mass plantings of lacebark and ribbonwood? Mānuka and kānuka? Or even *Carmichaelia stevensonii* (right) or Kōtukutuku? This plan presents a great opportunity to shift perceptions about native trees being boring.

4. Encourage retention of existing trees

I'm glad to see the plan includes incentivising developers to not just plant trees in their developments, but also to retain existing trees. Given that we get most benefit from mature trees, it's essential that there's a real incentive to retain what we already have. Fairly clearly, this must be a significant



we already have. Fairly clearly, this must be a significant financial incentive.

But why just developers? What about householders? I don't agree with compelling private landowners to retain trees they don't want, but I do believe a strong financial incentive to retain those trees could be very effective. I'd like to see this plan include a rates rebate on properties that have mature trees big enough to be counted in the urban forest. This would recognise the fact that trees on private property benefit the entire city, and would go some way to making large trees on private properties desirable.

After the events of the past month in Te Ika-a-Māui, the need to live more sustainably on this land has never been clearer. Our urban forest plan is a major part of this city being sustainable. I commend those who have put this together but ask them to go even further. Future residents will thank us for it.

Avon-Heathcote Estuary Ihutai Trust

http://www.estuary.org.nz/



2 March 2023

Submission on the Urban Forest Plan

- Submission to:Christchurch City CouncilAttention:Ann Tomlinsonengagement@ccc.govt.nz
- By: Kit Doudney, Chair Avon-Heathcote Estuary Ihutai Trust Board info@estuary.org.nz Christchurch

The Board of the Avon-Heathcote Estuary Ihutai Trust (the Estuary Trust) thank the Christchurch City Council for the opportunity to submit on the Urban Forest Plan.

The Estuary Trust supports in principle the plan to increase the city's tree canopy cover and to address inequities in that cover by suburb. This is especially important in the low-income eastern suburbs which neighbour Te Ihutai/the estuary.

Our main comments and recommendations range from the general to the specific:

- 1. We would caution that there is more to tree canopy cover than cooling streets and suburbs as the climate heats up. Cities and urban environments are particularly susceptible to threats such as storms and flooding. Urban trees help control runoff by catching rain in their canopies and increasing the infiltration rate of deposited precipitation. Reducing stormwater flow reduces stress on urban sewer systems by limiting the risk of hazardous combined sewer overflows. Furthermore, wellmaintained urban forests help buffer high winds, control erosion, and reduce drought.
- 2. We support the approach of "right location, right plant, right function" (p. 5) but note that the focus of the Draft Plan is on flora rather than fauna. We recommend greater attention to *increasing biodiversity* in working towards a sustainable city.

For example, tree species must be site-specific to provide suitable habitat for specific birdlife.

Here, the City Council could learn from the *Tūī Corridor project* designed by Meridian Energy in partnership with the Christchurch Foundation, whose plan is to plant islands of Tūī vegetation twice a year in consultation with local communities.

The Estuary Trust Board requests that similar projects be part of the Urban Forest Plan for **Te Ihutai/the estuary**, only in relation to waterbirds and shorebirds. The estuary is home to many internationally threatened birds and a specific planting programme is called for that is directed specifically to their needs.

We note here that the City Council identified Linwood Paddocks in the City's list of "outstanding natural areas" and in the Christchurch Biodiversity Concept Plan as part of the wider area including and adjacent to the estuary recognised for its "nationally important wildlife values".

3. The Estuary Trust Board emphasise the need for urgent action since the climate crisis is already upon us. The Draft Plan neglects to communicate or suggest that the Council will act on this urgency. This lack of urgency is apparent in Appendix 1: Action Plan, which indicates that priority funding is for planning purposes. Regrettably, no significant increase in tree planting on Council land is planned for until 2024 onwards; nor for new planting projects in areas with low canopy cover (p. 23).

On action to meet objective 2.1 (p. 25), we recommend that the Council commences work this year to identify tree species that are more suited to the city's future climate.

Yours sincerely,

MM

Kit Doudney Chair, Avon Heathcote Estuary Ihutai Trust info@estuary.org.nz

THE CONVERSATION

Academic rigour, journalistic flair



Falls are the main reason for childhood injuries, but kids usually recover. from shutterstock.com

Should I let my kid climb trees? We asked five experts

Published: October 28, 2019 7.47am NZDT

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We often remember childhood as a time when life seemed infinite and adventures in our backyard felt expansive, as if we were exploring other worlds.

Climbing a tree was its own adventure. You could discover what you were capable of, while also getting the chance to see the world from a different vantage point.

Of course, sometimes you'd fall. But that's to be expected – there's a risk in every journey of discovery.

Parents want their children to enjoy the same joys of childhood they look back on fondly, but many struggle with getting the balance right – how much freedom can you give while also making sure your child is safe?

We asked five experts – including a paediatric surgeon who operates on children who've fallen out of a tree – if it's OK to let kids climb trees.

Five out of five experts said yes



Although, in every case, it's a yes, but...

Here are their detailed responses:


Brendon Hyndman Physical education lecturer Yes

close -

Climbing trees strengthens children's muscles and can help them meet national physical activity <u>recommendations</u>. We also know <u>climbing requires</u> balance, coordination, is <u>highly enjoyable</u> and can help children work out their physical abilities. Children are drawn to climbing trees <u>often because</u> it's a way to calculate and overcome moderate levels of physical risk. Overcoming movement challenges is an <u>important step</u> in helping children develop confidence and value movement.

Connecting with <u>nature</u> also improves well-being and helps detach kids from the digital world. For younger children, large tree trunks <u>can instil</u> a sense of adventure. Similar to <u>teachers assessing</u> conditions for physical education, parents can gently monitor the suitability of trees for children's "climbing freedom" (looking at elements such as tree width, branch heights, access and weight support).

View author profile \uparrow Close



Lisa Sharwood Injury epidemiologist

Yes

close -

Play is a <u>vital part</u> of childhood. It encourages and challenges children's physical, emotional and social development. It's crucial children don't just play in formally-equipped areas but <u>also have</u> <u>contact</u> with the natural environment.

Risk-taking is an <u>essential feature</u> of play, providing kids with challenges and stimulating them to learn. But there needs to be balance between offering risk and keeping children safe.

Although <u>standards</u> for playground safety may not include trees, they provide valuable information about risks of heights, safe footing and judgement. Falls are the <u>most common reason</u> for injury in children. Playground safety standards permit fall heights of 3m for climbing

equipment but no greater than 1.8m for children under five.

If you have a "**yes or no**" education question you'd like posed to Five Experts, email your Young adults may face the risk of <u>serious injury</u> as they enter the workforce in some sectors. Teaching children to carefully negotiate

risks in a play anyironment is a significant developmental lesson for

Yes

close -

<u>children's development,</u> ss, and of their own

suchsung and capasitutes. It promotes <u>needom and it's thrilling</u>.

Dis Baye hologist Beter Gray profese that in the ASS scall kide all model arees. Educted argues risky of a filter free climital figuratices have have been and self-reliant while improving academic outcomes. Studies from Norway suggest climbing trees has an "anti-phobic effect" on children, meaning it gives them the chance to take risks, explore their fears and tenacity.

View author profile ↑ Close



SV Soundappan Paediatric surgeon

Yes

close -

On average, 30% of children that come to our hospital who require trauma-team activation (children likely to have serious injuries) sustain injuries from a fall. About 10% of these falls are from a tree. Their injuries range from minor cuts and bruises to more serious injuries like fractures, head injuries and bleeding from internal organs. Most fractures and internal organ injuries will heal within a few weeks to months and children can return to normal. Head injuries may need long-term rehabilitation, but these are a rarity and fatal injuries even more so. With the current epidemic of obesity, outdoor activities should be encouraged, but with supervision. Not every child will want to climb a tree but if they do, let them know what trees they can and cannot climb, make sure the environment

around is safe, set some rules, be around to supervise and let them enjoy a healthy childhood.

View author profile ↑ Close



Shelby Laird Environmental educator

Yes

close -

Children should climb trees but parents should know there will always be risks involved (as with almost every other aspect of growing up). In fact, the risk involved in tree climbing and other outdoor play activities is <u>part of the benefit</u> for children. Children develop the ability to assess risk by taking age- or ability- appropriate risks. Some researchers have even <u>theorised</u> we are doing a disservice by not allowing children risk-taking experiences. Connecting children with the natural world also has plenty of benefits – from <u>reducing ADHD</u> symptoms to lowering the risk of developing <u>myopia</u> (nearsightedness).

So, when your kids are ready, find a good steady tree with lots of limbs, give them some pointers from your childhood and encourage them to climb and explore. Just be ready to help them navigate the consequences when they overestimate their climbing ability and discuss strategies to help them be more successful with their next climb.

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04 March 2023

Christchurch City Council Te Hononga Civic Offices 53 Hereford Street Christchurch Central Christchurch 8013 engagement@ccc.govt.nz

Submission on the Draft Ötautahi-Christchurch Urban Forest Plan 2023

This is a submission made on the Draft Ötautahi-Christchurch Urban Forest Plan 2023 ('the Plan').

We would like to thank Christchurch City Council for the opportunity to make a submission.

We do not wish to be heard on my submission.

We currently live in the Hornby Ward, and my submission addresses the urgent need to address the low tree canopy cover in the Hornby Ward and promote the 'Hornby Bush' initiative.

In making this submission we acknowledge that the Plan sets out how we in $\bar{\mathbf{O}}$ tautahi-Christchurch will grow our tree canopy and sustain a thriving urban forest of healthy, diverse and resilient trees. Furthermore, I acknowledge that the Plan sets our direction and priority for planting, nurturing and protecting trees in $\bar{\mathbf{O}}$ tautahi-Christchurch now and in the future.

we acknowledge that trees provide a range of social, environmental, cultural ecological and economic benefits and services that enrich the quality of urban life and contribute to a well-functioning urban environment.

It is critical that the principle of equitable tree covers informs plan implementation through priority urban forest a**ff**orestation areas which should be specified in the Action Plan (Appendix 1).

We support Goal 1 of the Plan with the target of >20% tree canopy cover city-wide by 2070. I strongly support the direction to distribute canopy cover equitably, with no ward having less than 15% canopy cover.

We support in part the 2070 target canopy cover for open spaces being 40%. This is due to the need to address the inequity of public space on a ward by ward basis in the first instance. This requires meeting the level of service targets for the distribution and accessibility of open space being 80% of urban residential properties are <500m from a park (any type of park except a utility park) at least 3000m2 in size. It also requires meeting provision targets, being 20ha/1000 people for Regional Parks and 5.9ha/1000 people.

It is clear that the large industrial component of the Hornby Ward has skewed these level of service targets due to large areas without a resident population so there is less open space in the ward in the first instance. Without addressing the inequities of open space, tree canopy cover targets for open space will "lock-in" inequity.

It is important to recognise that the 15% tree canopy cover target for a ward could be achieved with roadside planting and plantings/retention of trees on private land, which does not have the same material benefits as forested open-space.

Given the baseline state of the Hornby Ward, we recommend that the Plan is amended to include priority urban forest a**ff**orestation areas which should be outlined in the Action Plan (Appendix 1). We consider that this must be included in the 2024-2034 Long Term Plan as well as the creation of a 'Hornby Bush'.

The Hornby Ward must be a priority for the Plan, particularly due to the concentration of industrial land uses and the propensity for the ward to struggle with urban heat island effect, increasing pluvial floods and the unhealthy concentrations of dangerous particulate matter in the ward.

It is critical that the Action Plan (Appendix 1) outlines the steps that will be taken to involve those with interests in the Hornby Ward for addressing the entrenched inequity of tree canopy cover in the ward.

We would like to see funding to achieve the plan have some financial weighting that sees programmes in the low canopy wards be given priority and work with the local schools and interested groups like the Greater Hornby Residents Association in ensuring the Hornby Canopy rate increases significally rather than be the poor cousin compared to other wards.

Currently there is funding allocated to projects in wards that already have a significant tree canopy when compared to other wards. We acknowledge Banks Peninsula will always be an exception.

We acknowledge that to be successful, Council will need to fund a large-scale tree planting programme across the city. I reiterate that there must be thoughtful and careful consideration of how to prioritise and fund large-scale tree planting.

We support the action to undertake a desktop analysis of our city to locate viable planting spaces across Council land. This should be accompanied with corresponding action to prioritise afforestation sites on the basis of the inequitable distribution of tree canopy cover, such as the Hornby Ward.

We strongly support the action to assess suburbs with low canopy cover to determine why it is low and determine what can be done to increase it. This action must be partnered with Goal 4 'involve' including the local communities of areas with low canopy cover.

We strongly support the action to target new planting projects in areas with low canopy cover. I also strongly support the action to identify where land may need to be acquired for the purpose of increasing tree planting, particularly in areas of low canopy cover and, where possible, in association with achieving other Community Outcomes.

We support the creation of a 'Hornby Bush' with native trees and possibly future ecological connections to the lower slopes of the Port Hills and the Waimakariri River.

We support the action to plant exemplar plots of di**ff**erent species in a range of environments, to foster public understanding of 'right tree, right location'. The Hornby Ward must include exemplar plots.

We would like to see funding of Fruit Trees in our area given a priority due to the low socioeconomic areas that exist in our ward.

We would like to see more attention paid to funding trees in and around the start of the Paparua Stream as it weaves it way through Broomfield and the Industrial Area of Waterloo Road and then into feeding both the Avon and Heathcote Rivers.

We would like to see due to the new City Plan proposed for our area and the high intensification that will come with it in the Hornby Ward a real commitment from the City Council to make sure our Ward does not decline further with its tree canopy and they we do not become the tarmac jungle of the West.

Submitted by: Julie Strathern, Joshua Barry

Dated: 04 March 2023



Olive House Bed And Breakfast

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Park Dr

Submission #50475

Green Bay Harvest (NZ) Limited

Sharnbrook Reserve

Ashton Mews

Fresh IT

Fletcher Consulting

Aylsham Reserve

Simx Christchurch

Regents Park Of

Aylsham Ln

Liquid Velvet Coffee mobile coffee cart...

> Altitude Pole & Fitness Redwood, Christchurch

Noel Leeming Distribution Centre

Not Socks Gifts Cift stop

nate

osy Cafe

GG Don Plumbing, Roofing & Sheetmetal

Carbatee Christchurch



Ceman Pl

Alderney Mews













Submission #50475



Submission on the

Urban Forest Plan 2023



March, 2023

Ōpāwaho Heathcote River Network Inc.

Email: info@ohrn.nz Website: <u>www.ohrn.nz</u> Facebook: OpawahoHeathcoteRiver Phone: 027 672 7497 Thank you for the opportunity to make a submission on the Urban Forest Plan. The Ōpāwaho Heathcote River Network is committed to partnership with the Christchurch City Council to help increase the canopy cover in the city, and in the Ōpāwaho Heathcote River catchment in particular, as one means by which the mauri of the river can be restored..

The **Ōpāwaho Heathcote River Network**

The Ōpāwaho Heathcote River Network (OHRN) is a community-based catchment group that cares deeply about the health and mauri of the river; about connecting the community around the river and about advocating for the river. We also facilitate and support the values, efforts and needs of our local river care organisations and communities along the river.

The State of the Opāwaho Heathcote River

The Ōpāwaho Heathcote River, including many of its tributaries, has some of the poorest water quality in the city of Christchurch. At the same time, the river has been designated a **Site of Ecological Significance** in the District Plan.

There are early signs that the River is beginning to recover from its historical degradation but there remains much that must be done to restore it to its proper state. We look forward to observing the ways in which the Urban Forest Plan will assist in this long-term restoration of the river.

Feedback on the Urban Forest Plan from the Opāwaho Heathcote River Network (OHRN)

This feedback is in two parts. The first part is a series of generalised comments on the Urban Forest Plan: on the intent, on what we believe are some weaknesses and gaps within the plan. The second part is a table of specific comments about items in the Urban Forest Plan.

A: General comments

- 1. In general, the OHRN strongly supports the intent of increasing the canopy cover within the city particularly as it relates to biodiversity objectives.
- 2. We submit that the Urban Forest Plan would be greatly strengthened through increased reference to and integration with relevant ecological planning documents as outlined below. A useful introductory paragraph would set out the integration of the conventional hierarcy of
 - a. National Policy Statements
 - b. Regional Plans
 - c. Christchurch District Plan
 - d. CCC strategy documents
 - e. CCC policy documents

- 3. Our preference is that any strategy about what plants we retain, encourage and plant has ecological integrity as its stated basis. This would better acknowledge a range of ecological systems dune lands, wetlands, coastal bush, riparian planting, etc not all of which include large trees. Such an approach would support the goal in the *Kia tūroa te Ao Ōtautahi Christchurch Climate Resilience Strategy*: "Restore ecosystems vulnerable species, habitats and ecosystems will be protected and managed in ways that support their restoration."
- 4. The *Christchurch City Council's Biodiversity Strategy* provides particular guidance which we believe should have more emphasis and visibility within the Urban Forest Plan itself:
 - a. "The Council's indigenous biodiversity priorities are to protect existing biodiversity in threatened land environments and to protect existing habitats for indigenous biodiversity and nationally and locally threatened species."
 - b. "The Council has a leadership responsibility in the protection and enhancement of **indigenous biodiversity** in Christchurch and Banks Peninsula."
- 5. The *Christchurch City Council's Biodiversity Strategy* also contains specific reference to two areas of strong interest to the OHRN which are particularly relevant and ought to be reflected in the content of the Urban Forest Plan:
 - a. "12. Port Hills forests Management of the south-west Port Hills will encourage the continued expansion of native forest on the wetter part of the Port Hills. This is a significant area for bush birds that visit the city. An eventual forest area of approximately 2000 ha is possible. Continued predator control to encourage increased numbers of existing bush birds such as bellbird/koparapara, kereru, tomtit and morepork (ruru koukou) is important."
 - b. "17. Ōpawaho/Heathcote River Water quality improvement and reduced sediment loads in the river system are highly desirable as well as protection and enhancement of riparian vegetation, fish and invertebrate habitats. The wooded portions of the upper Heathcote and Canterbury Park are important as native bird corridors and habitat areas. New native forest patches in this area would complement the existing river corridor."
- 6. Any ecological plan currently being prepared by the Council should acknowledge and take into account relevant aspects of the *National Policy Statement for Indigenous Biodiversity,* currently in draft form. This Policy Statement sets out the objectives and policies to identify, protect, manage and restore indigenous biodiversity under the Resource Management Act.
- 7. The *Christchurch City Council Tree Policy* refers specifically to sites of ecological significance in a manner which the Urban Forest Plan appears to minimise. The Urban Forest Plan would be enhanced if it quoted directly from or paraphrased the following from the Tree Policy:
 - a. "1.4 Within sites and/or adjacent to sites of ecological significance (SES) listed in the Christchurch District Plan, and other sites that meet the significance criteria for listing as SES such as areas of Banks Peninsula, and the Port Hills, we will strengthen and

enhance existing indigenous biodiversity and ecological resilience by planting only eco-sourced native species except where other species are necessary for specified reasons. An ecologist should be consulted prior to any planting and maintenance being undertaken."

- 8. The Urban Tree Plan, as written, has a narrow focus on canopy cover provided by trees greater than 3.5m tall. On the stated principle of "Right location, right tree, right function" hangs any differentiated response between structured environments (eg parks, residential streetscapes) compared to other spaces (eg waterway corridors, naturalised reserves, open spaces). "Right function" must therefore carry the entire weight of the ecological strategy of the plan and any connection into the Biodiversity Strategy. The linkage between "Right function" and ecological restoration should be made much more overt in the plan, particularly for spaces which are not structured environments (eg waterways). The way that the plan has been written, it appears that the authors are principally focused on the placement of individual trees in structured environments. If the plan is to have wider application, ecological restoration in other environments must be properly acknowledged.
- 9. In support of the ecological restoration of the Opawaho Heathcote River, we strongly support the intention to increase the planting of trees in riparian spaces and to improve the canopy cover in waterways to 30% by 2030 and to 70% by 2070 provided this planting is part of a co-ordinated effort to restore the overall ecological resilience of the waterways.
- 10. If the Council is committed to achieving the target of 30% canopy cover in waterways by 2030, it will need to radically alter the management of waterways to integrate the Parks, Roading and Waterways functions. As it currently stands, the lack of integration of operations between these functions, the absence of teams dedicated to and knowledgeable about the improvement of waterway environments, and the contracting out of maintenance of riverbanks all combine to thwart much of the intention of this plan. As a consequence, we suggest that the Urban Forest Plan should clearly indicate the need for commitment by Council to staffing dedicated teams responsible for waterway corridor maintenance and restoration.
- 11. We strongly support the intention to increase the number and area of mini-forests/bush patches throughout the city, particularly where these can include tributaries of the river and may support reduction in sediment entering the river while increasing the native bird population. This intention to create bush remnants, particularly in appropriate riparian margins, could be more clearly enunciated in the body of the Urban Forest Plan rather than only being clarified in Action 2.4..
- 12. We strongly support the intention expressed in several parts of the plan to increase the proportion of native trees planted across the city. We suggest that this is particularly relevant in the planting along waterways to reduce the amount of leaf fall and to increase naturalisation of these areas. We suggest that the plan should also indicate that deciduous exotics planted in riparian areas should not be replaced when removed.
- 13. We strongly support the intention to view trees as important and necessary aspects to the city infrastructure, requiring other infrastructure elements to give space to trees.

- 14. We strongly support the intention to increase the planting of trees in public spaces.
- 15. We support the intention, demonstrated in the webinars associated with the release of this plan, to apply a recession plane model to the placement of trees in public spaces; we believe that this model should be included in the printed plan to mitigate concerns of residents about how shading will affect their properties.
- 16. We strongly support the intention to increase the protection and nurture of planted trees. We suggest that this will require the Council to review its policy of how riverbanks and parks are maintained to prevent the on-going, substantial damage to the bark and trunks of trees from weed-eater machinery. This on-going damage compromises the ability of trees to thrive and reach maturity, negating Goals 2 and 3 of this plan.
- 17. We strongly support the intention to encourage community groups to take responsibility for the nurture and care of planted trees. This will require community park ranger staffing beyond that currently provided so as to adequately cover weekend days when the majority of residents are available and willing to assist. We are prepared to assist the Council in achieving this intention.

B: Specific comments

Page 12: What we need to do

- 1. The list of plans referred to includes the "*Draft Ōtautahi Christchurch Plan*". What is this plan? There is no link to such a plan on the CCC website. We suspect that this should read "*Christchurch District Plan*".
- 2. The list of "...key Council and sub-regional plans already complete or underway..." should include the following:
 - a. Lower Ōpāwaho River Guidance Plan adopted by the CCC in 2022. All of the Actions relating to tree planting as stated in the Lower Ōpāwaho River Guidance Plan dovetail exactly with the intentions of the Urban Forest Plan. The guidance provided in the Lower Ōpāwaho River Guidance Plan is worth quoting at relevant points throughout the Urban Forest Plan.
 - b. Canterbury Pest Management Strategy
 - *c. Christchurch City Council Weed Species Policy*. This policy should be referred to throughout the Urban Forest Plan. Alas, it does not yet exist. Its absence is a glaring hole in the plans for ecological restoration of Ōtautahi Christchurch, a hole that demands urgent closure.

Page 14: Changing climate conditions and impacts on the urban forest

1. We support the stated place of trees in assisting the mitigation of climate change. We suggest that the plan would be improved by changing the sentence, "*While the government and Council are currently focused on reducing our emissions, …*" to a more active, inclusive call for

emission reduction from not just governmental agencies but from individual residents as well; Council plans should amplify the notion that we are all part of the solution.

Page 15: Increase in storm events

1. "Trees also help prevent erosion of hillsides which is predicted to increase with more droughts coupled with sudden extreme rainfall events." This is a very timely comment given recent events in the North Island. It seems strange to us that despite this sentence, there is no reference in the Urban Forest Plan to substantial planting for erosion protection on the Port Hills which we assume would be covered by the plan. Specific endorsement of restoration planting on the Port Hills has been recommended by every review of sediment control in the area. The Urban Forest Plan, if it is to be seen as a useful document, should specifically recommend planting of trees on the Port Hills.

Page 16: The way forward

- 1. "...Planting more native trees in high-use areas, such as local parks and streets, will not only increase their presence in the landscape, but also the resilience of the urban forest whilst maintaining the large deciduous landscape that Ōtautahi Christchurch is known for." This sentence is both ungrammatical and misleading. The reference to a "large deciduous landscape" overstates the position of exotic species particularly in regard to those public spaces which are not public parks like Hagley Park and similar highly structured reserves. The current wording appears to privilege the place of exotics in the general landscape when, in reality, it is only in specific recreational parks that these trees should be maintained by the Council as a dominant feature. It would be better if this sentence was changed to read: "...Planting more native trees in high-use areas, such as local parks and streets, will not only increase their presence in the landscape, but also the resilience of the urban forest. A deciduous landscape may be retained in such public parks and reserves as may tell particular heritage stories for which Ōtautahi Christchurch is known."
- Part of the way forward must include removing from public spaces (and not planting more) some exotic species that are biodiversity pests or have negative impact on people and communities and/or create issues -: Ash (*Fraxinus excelsior*), Buddleia (*Buddleja davidii*), Holly (*Ilex aquifolium*), White Poplar (*Populus alba*), Elder (*Sambucus nigra*), Sycamore (*Acer pseudoplatanus*), Silver Birch (*Betula pendula*), Tree of Heaven (*Ailanthus altissima*). It would be useful if these pest species were named in the Urban Forest Plan and reference made to the *Christchurch City Council Weed Species Policy* (see comment above about the absence of this policy).
- 3. A corollary to increasing the proportion of native trees planted, but which is not stated in the plan, should be a policy of progressively removing exotic trees from waterway areas and replacing them with appropriate native trees. This gradual removal of exotics from waterway areas should be clearly enunciated in the Urban Forest Plan.

Goal 1: Plant - Our urban forest canopy cover is growing sustainably

1.1 Grow our urban forest and achieve and maintain canopy cover targets	Strongly support but see below
1.2 Distribute canopy cover equitably, with no ward having less than 15% total canopy cover	Strongly support the equity objective but see below
1.3 Increase planting requirements within our streets; and	Strongly support
1.4 Develop targets for Banks Peninsula rurally-zoned land	Support, but amend as below

- 1. The canopy cover of trees greater than 3.5m is a useful but simplistic measure of tree density. It does not provide any indication of the ecological value of the forest/bush/habitat that these trees provide. This needs to be taken into account when determining which areas of the city should be prioritised.
- 2. There are definitely urban areas of the city where there is a deficit of large trees Aranui, Linwood, Sydenham, Wigram, Hornby, Riccarton and reversing this deficit is a positive goal.
- 3. However, any larger pine plantations should be removed from any canopy measures as production pine forest has little relevance to urban ecology of the area eg Bottle Lake Forest, McVicars.
- 4. We suggest that to emphasise the importance, availability and strategic advantage of riparian planting either add ",,,streets and riparian margins;..." to 1.3 or create a new sub-goal "Significantly increase planting requirements within our riparian margins"
- 5. Within the goal of increasing riparian plantings, add consideration to be undertaken of the narrowing or stopping of riverside roads as one means of increasing the area for riparian planting.
- 6. Amend 1.4 to include the italised word "Develop targets for Banks Peninsula rurally-zoned land, *and specific targets for the Port Hills to reduce the risk of erosion.*"

Goal 2: Nurture - Our urban forest thrives with healthy, diverse and resilient trees

2.1 Grow an urban forest that is resilient and contributes to mitigating the effects of climate change;	Strongly support but see below
2.2 Safeguard our urban forest by ensuring a healthy diverse range of tree species and ages;	Strongly support
2.3 Base tree selection on species, needs and attributes that benefit the immediate environment;	Support
2.4 Increase the visibility of native tree species and create ecological corridors; and	Strongly support

2.5 Select and design planting sites to enable a tree to reach maturity and minimise conflicts with the surrounding area	Support conditionally; see below
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1. It should be made clear that planting will not, on its own, take us significantly towards mitigating climate change; other behavior change will be required.

Goal 3: Protect - Our urban trees are valued and looked after as critical infrastructure

3.1 Retain our existing canopy cover;	Strongly support but see below
3.2 Consider trees as critical infrastructure; and	Strongly support but see below
3.3 Care for and maintain trees to extend their life.	Strongly support but see below

- Retention of existing cover as an objective should not get in the way of methodically identifying and removing weed tree species. Weed species are excellent propagators (the reason they are usually classified as weeds) and often out-compete native species for sunlight and space. Hence, removal of weed tree species will, in the medium term, assist with long-term canopy cover as well as achieving biodiversity objectives.
- 2. Making room for trees amongst other infrastructure will require changes in the relative importance of infrastructure. For example, it will be necessary to remove underground pipes from riverbanks and riverside roads not only to increase the room for trees but also to future proof such infrastructure from climate change effects such as sea-level rise and increased rainfall/flooding.
- 3. It will be vital that current approaches to riverbank maintenance are radically altered so that damage from weed-eater machinery to juvenile (and mature) tree trunks/bark is halted. Currently, almost every tree planted beside a river shows evidence of weed-eater damage which will significantly reduce the proportion of planted trees surviving the maintenance period and reaching maturity.

Goal 4: Involve - Our urban forest is nurtured by partnerships and participation

4.1	Encourage communities to actively participate in the protection and development of our urban forest and have a deep understanding of its value;	Strongly support
4.2	Work with iwi, community groups and organisations that contribute to our thriving forest;	Strongly support but see below

4.3 Ensure mana whenua priorities are clearly incorporated into planning and actions to promote the urban forest/forest; and	Strongly support
4.4 Celebrate different cultures through our trees.	What does this mean? See below

1. "Celebrate different cultures through our trees" - what does this mean? If planting trees from our Sister Cities is contained within this idea, this should be very controlled and isolated to appropriate parks/spaces.

If the meaning of "celebrate different cultures through our trees" is a guarded reference to protecting and preserving the English settler culture as evidenced in the creation and planting of Hagley Park and the weeping willows along the Ōtākaro Avon River, then the authors should be confident enough of their ground to say so.

We can accept that the urban landscape of the Ōtākaro Avon River, as it passes through the inner city, can be dominated by weeping willows as a acknowledgement of the English settlement and creation of the city. However, we submit that the Biodiversity Strategy requires that the Red Zone and the Ōpāwaho Heathcote River be largely populated by native trees, preferably in mixed plantings that create smaller tiny forest/bush patches.

2. This will require increased funding to increase the number and spread of Community Park Rangers, and their equipment. Since the majority of community groups must function on weekends, it will be necessary to increase staff availability on weekends

Page 21: Implementation and funding

1. Given the declaration of climate emergency by the Christchurch City Council, there is high expectation by us that the Council will prioritise increased allocation of funding for the implementation of this plan in the current Annual Plan and the Long-Term Plan. We will watch for this.

Appendix 1: Action Plan in detail

Comments on specific items.

No.	Action	Comment
1.1	Increase the growing capacity of our nursery to meet the demands of our tree planting programme.	This will need to be a substantial and sustained increase.
	Establish requirements for new development sites to have a minimum of 20% projected canopy cover onsite or pay a Financial Contribution (FC) to Council for planting to occur elsewhere.	For this incentive to be effective, or for the penalty paid to reasonably increase coverage, the FC will need to be a significant penalty.

1.2	 Consider adding these additional action items: Implement Lower Ōpāwaho River Guidance Plan as it relates to planting. Increase planting and maintenance of planting on Port Hills slopes/valleys. 	
1.3	Develop a comprehensive list of engineering design standards to allow trees to be incorporated into our streets, and how they can be used for other functions, such as speed management.	Agree; but provide guidance on suitable tree species. Discourage the planting of deciduous trees as their leaves block the stormwater system, and add litter and nutrients into the rivers as the receiving environment
	 Consider adding these additional action items: Map available spaces for planting trees within riparian spaces Review riverside streets with a view to narrowing and using this space to increase riparian planting. Review riverside riparian spaces to identify suitable areas for tiny mixed-native forest plantings to provide density compared to single specimens. 	
2.1	Grow an urban forest that is resilient and contributes to mitigating the effects of climate change.	Strongly support. Native trees are better suited to provide resilience and mitigate the effects of climate change.
2.4	Increase the visibility of native tree species and create ecological corridors.	Strongly support increasing the visibility of native tree species, especially in ecological corridors
3.3	 Consider adding these additional action items: Review management of waterways and riverbanks to improve co-ordination of operations and achieve better outcomes for riparian planting Review management/maintenance of waterways and riverbanks to reduce damage to trees from weed-eater machinery 	
4.1	 Consider adding this additional action item: Promote and assist the work of collectives in the ecological restoration space 	Organisations such as OHRN are always in need of support to promote the mahi of the Community Groups in their catchment.
4.2	Engage with iwi, developers and community groups for assistance with the planning,	This will require increased funding to increase the number and distribution of Community

management and advocacy for urban trees.	Park Rangers, and their equipment. Weekend availability is a premium for Community Group health.
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Thank you for the opportunity to provide a submission on the Urban Forest Plan.

Annabelle Hasselman

Chair, Ōpāwaho Heathcote River Network

3 March 2022

Christchurch City Council Te Hononga Civic Offices 53 Hereford Street Christchurch Central Christchurch 8013 engagement@ccc.govt.nz

Submission on the Draft Otautahi-Christchurch Urban Forest Plan 2023

This is a submission made on the Draft Otautahi-Christchurch Urban Forest Plan 2023 ('the Plan').

The Greater Hornby Residents Association would like to thank Christchurch City Council for the opportunity to make a submission.

The Greater Hornby Residents Association wish to be heard on my submission.

We activate for the Hornby Ward, and our submission addresses the urgent need to address the low tree canopy cover in the Hornby Ward and promote the GHRA 'Hornby Bush' initiative.

In making this submission we acknowledge that the Plan sets out how we in Otautahi-Christchurch will grow our tree canopy and sustain a thriving urban forest of healthy, diverse, and resilient trees. Furthermore, we acknowledge that the Plan sets our direction and priority for planting, nurturing, and protecting trees in Otautahi-Christchurch now and in the future.

The Greater Hornby Residents Association acknowledge that trees provide a range of social, environmental, cultural ecological and economic benefits and services that enrich the quality of urban life and contribute to a well-functioning urban environment.

It is critical that the principle of equitable tree covers, informs plan implementation through priority urban forest afforestation areas which should be specified in the Action Plan (Appendix 1).

The Greater Hornby Residents Association support Goal 1 of the Plan with the target of >20% tree canopy cover city-wide by 2070. We the GHRA strongly support the direction to distribute canopy cover equitably, with no ward having less than 15% canopy cover.

The Greater Hornby Residents Association support in part the 2070 target canopy cover for open spaces being 40%. This is due to the need to address the inequity of public space on a ward by ward basis in the first instance. This requires meeting the level of service targets for the distribution and accessibility of open space being 80% of urban residential properties are <500m from a park (any type of park except a utility park) at least 3000m2 in size. It also requires meeting provision targets, being 20ha/1000 people for Regional Parks and 5.9ha/1000 people.

It is clear that the large industrial component of the Hornby Ward has skewed these levels of service targets due to large areas without a resident population so there is less open space in the ward in the first instance. Without addressing the inequities of open space, tree canopy cover targets for open space will "lock-in" inequity.

It is important to recognise that the 15% tree canopy cover target for a ward could be achieved with roadside planting and plantings/retention of trees on private land, which does not have the same material benefits as forested open-space.

Given the baseline state of the Hornby Ward, we recommend that the Plan is amended to include priority urban forest a**ff**orestation areas which should be outlined in the Action Plan (Appendix 1). We consider that this must be included in the 2024-2034 Long Term Plan as well as the creation of a 'Hornby Bush'.

The Hornby Ward must be a priority for the Plan, particularly due to the concentration of industrial land uses and the propensity for the ward to struggle with urban heat island effect, increasing pluvial floods and the unhealthy concentrations of dangerous particulate matter in the ward.

It is critical that the Action Plan (Appendix 1) outlines the steps that will be taken to involve those with interests in the Hornby Ward for addressing the entrenched inequity of tree canopy cover in the ward.

We would like to see funding to achieve the plan, have some financial weighting that sees programmes in the low canopy wards be given priority, and work with the local schools and interested groups like the Greater Hornby Residents Association in ensuring the Hornby Canopy rate increases significally rather than be the poor cousin compared to other wards.

Currently there is funding allocated to projects in wards that already have a significant tree canopy when compared to other wards. We acknowledge Banks Peninsula will always be an exception.

We acknowledge that to be successful, Council will need to fund a large-scale tree planting programme across the city. We reiterate that there must be thoughtful and careful consideration of how to prioritise and fund large-scale tree planting.

We support the action to undertake a desktop analysis of our city to locate viable planting spaces across Council land. This should be accompanied with corresponding action to prioritise a**ff**orestation sites based on the inequitable distribution of tree canopy cover, such as the Hornby Ward.

The Greater Hornby Residents Association strongly support the action to assess suburbs with low canopy cover to determine why it is low and determine what can be done to increase it. This action must be partnered with Goal 4 'involve' including the local communities of areas with low canopy cover.

The Greater Hornby Residents Association strongly support the action to assess suburbs and strongly support the action to target new planting projects in areas with low canopy cover. I also strongly support the action to identify where land may need to be acquired for the purpose of

increasing tree planting, particularly in areas of low canopy cover and, where possible, in association with achieving other Community Outcomes.

The Greater Hornby Residents Association strongly support the action to assess suburbs and support the creation of a 'Hornby Bush' with native trees and possibly future ecological and economic benefits and services.

The Greater Hornby Residents Association strongly support the action to assess suburbs and support the action to plant exemplar plots of di**ff**erent species in a range of environments, to foster public understanding of 'right tree, right location'. The Hornby Ward must include exemplar plots.

The Greater Hornby Residents Association strongly support the action to assess suburbs and would like to see funding of Fruit Trees in our area given a priority due to the low socioeconomic areas that exist in our ward.

The Greater Hornby Residents Association strongly support the action to assess suburbs and would like to see more attention paid to funding trees in and around the start of the Paparua Stream as it weaves it way through Broomfield and the Industrial Area of Waterloo Road and then into feeding both the Avon and Heathcote Rivers.

The Greater Hornby Residents Association strongly support the action to assess suburbs and would like to see, due to the new City Plan proposed for our area, and the high intensification that will come with it in the Hornby Ward, a real commitment from the City Council to make sure our Ward does not decline further with its tree canopy and that we do not become the tarmac jungle of the West.

Submitted by: Marc Du**ff** (Chairperson) on behalf of the Greater Hornby Residents Association Dated: 3 March 2023

More Than a Drain: Improving the health of St Albans Stream through riparian planting methods



A community research project partnering with the St Albans Residents Association and GEOG309 to enhance the quality of the much-loved Abberley Park

Matthew Edmonds, Jonathan Holden, Jessica Nisbet, Tavake Tohi & Lauren Walker 20th October 2022

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Executive Summary

- St Albans Stream runs through Abberley Park, in St Albans, Christchurch. The park is an attractive, biodiverse greenspace. However, locals are concerned about erosion and water quality.
- We collaborated with the St Albans Residents Association (SARA) to investigate what native riparian planting methods should be applied in Abberley Park to improve St Albans Stream health.
- Enhancing green and blue space through riparian planting benefits wellbeing, stream health and community resilience. Using indigenous species, deep planting and mulching techniques improves the success of plantings.
- We engaged Rehua Marae and acknowledged a recent survey on the park's public perception.
- We measured conductivity, pH, dissolved oxygen, and macroinvertebrate community index (MCI). The MCI indicated poor stream health. pH and dissolved oxygen were within an acceptable range.
- We observed local bank conditions and vegetation cover. Upstream sections in Abberley Park with high canopy cover need to be planted in shade tolerant native species. Downstream sections with low canopy cover require dense planting of sun-tolerant species.
- There were limitations with data collection, available literature and community engagement.
- We suggest future research looks at continuing water monitoring, plant maintenance and community engagement. Future research should aim to expand water and bank assessment measures, continue Investigating public perception native plantings in heritage parks, analysing new stream enhancement techniques.

1. Introduction

Abberley Park is one of Christchurch's eight heritage parks and is highly valued for its social, cultural, and ecological values. It is located north of the Central Business District in Ōtautahi (Figure 1). Abberley Park has beautiful green space which attracts native birds such as the Pīwakawaka and Kererū. It also has an abundant resident species of monarch butterfly which is highly valued by the community. This emphasises the importance and value of the green- and bluespaces in Abberley Park. The stream, however, suffers from poor water quality. It was important for research to be conducted to find ways to improve the stream health, so the local community can continue to enjoy the scenery at Abberley Park.

The St Albans community are concerned about the streams water quality. Respondents from a survey conducted by Blundell-Dorey et al. (2022) highlight the publics negative perceptions on the maintenance and health of St Albans Stream. People interviewed mentioned that mud, rubbish and stormwater discharge is reducing stream health. Overall, green infrastructure is well supported in Abberley Park, but blue infrastructure is not.

Our GEOG309 group conducted research in partnership with Emma Twaddell and Shamani Gill from the St Albans Residents Association (SARA). SARA is a community run organization that aims to 'foster a spirit of community' in St Albans. One of their objectives is to encourage activity that will benefit the welfare of residents in St Albans (SARA, n.d.). A way to do this is to improve the water quality in Abberley Park, specifically St Albans stream which runs through the park.



Figure 1. St Albans area with the project site, Abberley Park, circled in pink (Google, 2022).

The St Albans Residents Association have the 100-year anniversary of Abberley Park in 2040 and would ideally like the stream to have improved water quality by then. Therefore, there is 18 years to build and implement a plan for the stream. Urban stream health is not only important for its looks. Aquatic life (plants and macroinvertebrates) would also thrive with better water quality. The health of the water in a stream directly influences how well the aquatic life can grow and reproduce (US National Park Service, 2022). Therefore, this research is important to investigating solutions for the poor health of St Albans Stream.

2. Research Question

The research question decided on is: What native riparian planting methods should be applied in Abberley Park to improve St Albans stream health? The aim of this question is to provide guidance to SARA on riparian species selection, planting methods and maintenance. Identifying the benefits of riparian planting on stream health and community wellbeing will also be investigated.

Riparian planting was chosen due to the indication by Emma Twaddell and Shamani Gill that the lack of bank stabilization was a key factor in the degraded stream health. There is often partial collapse of the stream's sides especially after heavy rain. Riparian planting will decrease erosion and sedimentation, improve water quality, and improve ecological health (Soeter, 2020).

This research question builds on previous research conducted by Blundell-Dorey et al. (2022). This study addresses two recommendations from the report. The first being "additional research is required to identify areas of the stream where riparian planting is most needed" and the second, "to identify which species would be of best fit for planting." These two recommendations will be taken on board in this project to identify the riparian planting species, methods, and locations for the section of St Albans stream in Abberley Park.

3. Literature review

For our literature review we had five sub-themes: plant species selection, riparian planting methods and maintenance, greenspace and bluespace, community engagement and stream health. We chose these sub-themes because they relate to improving the St Albans stream health and align with SARA's interest to improving Abberley Park while having the community engaged in the process.

Plant species selection is vital to ensuring the riparian buffer improves stream and ecological health. Riparian planting methods and maintenance are needed to ensure the long-term effectiveness of the riparian buffer, reducing the risk of failure and need to replant. Knowing the benefits of greenspaces and bluespaces justifies why we are adopting riparian planting. Community engagement is important to ensure

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that stakeholders of our project get their ideas and opinions heard and to ensure they are onboard and included with what we are doing. Stream health measures gauge the physical, ecological and chemical conditions of St Albans stream and assess how riparian planting might improve these factors.

3.1 Plant species selection

This review considered the species selection along the banks of the stream with the focus on bank stabilization, succession, reducing pollutants from stormwater and including Māori indigenous plants. To select species for riparian planting in Abberley Park, the design and methods of previous research projects are required to form an educated decision for what plants suit the environment best to meet our community partners goals.

Two studies showed which plant species were better equipped to deal with different salinity levels of stormwater. One studied the natural succession of different plants in different salinities (Xiaoping, Fei, Hsiang-te, & Haiyang, 2017) while the other synthetically produced an environment to measure different plant species effectiveness at removing pollutants in different salinities (Tang, Chan, Farzana, Wai, & Leu, 2021). These studies both gave specific species that succeed in different salinities.

Key findings from Daigneault et al. (2017) and Renouf & Harding (2015) show enhancing greenspaces with additional plantings is more effective than natural plant succession. Hence, it is vital that we choose appropriate species to plant. According to the research this would result in benefits to the waterway in Abberley Park.

Riparian restoration programs using only indigenous New Zealand species has positive effects on loworder streams and waterways (Marden, Rowan, Phillips, & C, 2005). The results of the study by Marden et al. (2005) showed cabbage tree, lemonwood, ribbonwood, karamu, lacebark, and tutu resulted in the best outcomes. Deep rooted plants support bank stabilization, reduces pollutants entering the stream and provide social benefits to users of the park who can walk past indigenous nature, achieving the goals of the project.

3.2 Riparian planting methods and maintenance

Riparian planting is defined as planting along the edges of waterways. Planting stabilises banks, reduces soil erosion and shades the stream, reducing temperatures. Roots filter out contaminants such as nitrates, phosphorus, and pathogens. Reducing contaminants improves waterway health while shade from the plants improves ecological health (Dairy NZ, 2022).

Whip cuttings have low maintenance and irrigation requirements while having high survival rates making them the best option to implement tress and large shrubs. Seedlings have higher rates of survival standard seeds and so should be used to implement understory plants. Whip cuttings also work to stabilise banks and

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reduce soil erosion (Dreesen et al., 2008). If the right shade-tolerant species are used, seedling survival can improve by 70-85% (Sweeney, 1993).

Increasing density, diversity and stratification increases riparian planting success and water quality (Jo et al., 2014). Wider riparian buffers are more effective at improving water quality. In Abberley Park, the width of the riparian buffers should be at least five meters. (Parkyn et al., 2000).

Riparian buffers in urban zones are more prone to invasive species which reduce the riparian buffers effectiveness at improving stream health (Loewenstein & Loewenstein, 2005). We have planned to use biodegradable herbicides to spot-spray weeds with minimal impact to the riparian planting (Department of Conservation, n.d.). Mulching the soil is recommended before planting to remove weeds and grasses (Jo et al., 2014). Diseased plants need to be constantly replaced to maintain vegetation density (Department of Conservation, n.d.). Canopy cover reduces the growth of grasses which reduce plant competition (Moore et al., 2011). Therefore, shady sites require lower weed management.

3.3 Greenspace and bluespace

Blue and Greenspace are used in an urban context. Bluespace includes outdoor water features like streams and greenspace includes vegetated areas like parks. While there are negative impacts resulting from greenspace, the average New Zealander would pay \$184, or volunteer 4 hours, to save 20% of trees in their local neighbourhood (Vesely, 2007). Hence, interest in our project is strong.

Greenspace directly and indirectly improves people's wellbeing. Greenspace improves people's physical health through increasing exercise (Chomley, 2021). Greenspace improves people's mental health by relaxing the brain and reducing stress, anxiety, and anger (Nutsford et al., 2016). Greenspace improves neighbourhoods by increasing social interactions and cohesion. This increases property values and reduces crime (Durning, 2010; Vesely, 2007; Nutsford et al., 2016). These benefits however differ between people.

Greenspace offers ecosystem services including carbon storage, wind and noise reduction, air quality (Vesely, 2007), seed dispersal, biodiversity and habitats (Nguyen et al., 2021). Greenspace also improves bluespace by reducing contaminants, runoff, erosion (Durning, 2010) and temperatures (Chomley, 2021). Therefore, riparian planting will enhance the green space in Abberley Park and the bluespace of St Albans Stream, thus achieving our research question.

3.4 Community engagement

Within communities like St Albans smaller groups form around shared values and interests. These groups have the power to shape local neighbourhoods (Gibson-Graham et al., 2013). SARA is one of these groups and has ongoing initiatives to promote community engagement.
Aspects from the government's inclusive community engagement guidelines (Department of the Prime Minister and Cabinet, 2021) guided our project. This included identifying different stakeholders, such as the Rehua Marae, Mana Whenua, SARA and the St Albans community. It is important to include ideas, opinions and concerns through conversation with stakeholders. Failure to do so could result in dissatisfaction, loss of trust and project failure, which could cost the community more to resolve in the future (Ferguson, 1990). Ensuring community engagement in the planting and maintenance process is critical to ensuring the planting is valued and supported. It also lets community members take pride and ownership in the project. This will benefit the project's long-term success.

3.5 Stream health

The macroinvertebrate community index (MCI) measures the abundance of pollution sensitive taxa in a waterway, and it is a widely agreed method of assessing stream health (Suren et al., 2005; Thompson & Parkinson, 2011; Gadd, 2020). Using a combination of water quality parameters in conjunction with the MCI is recommended (Che, 2012). Our research methodology was informed by this. It should be noted that macroinvertebrates may be constrained by the urban environment, limiting the rate of colonisation possible by the invertebrates.

Riparian planting is a tool in a set of enhancement techniques, it is not at all a cure. Riparian planting has the biggest impact on diversification of streamside habitats, biodiversity, bank stability and water quality traits like temperature (Suren et al., 2005; Thompson & Parkinson, 2011). The benefits identified add credibility to our research and our plan to implement riparian planting to improve the St Albans Stream health to meet the goals of our community partners.

The naturally flat topography of Christchurch, low flows, sediment from urban development, storm water inputs bypassing the riparian buffer and the imperviousness of the urbanised catchment limit the benefits of riparian planting (Gadd, et al., 2020; Suren et al., 2005; 2005). Riparian planting still benefits local conditions without changing the catchment (Thompson & Parkinson, 2011) which fits right alongside our community partners goals.

4. Mana Whenua significance

This research is relevant to Mana Whenua, particularly, Te Ngāi Tūāhiriri Rūnanga, who are kaitiaki of the land at St Albans (TeRunanga o Ngai Tahu, 2022) and Rehua Marae, who were our primary contact for consultation. The goal of this project aligns with the values of Mana Whenua. This includes wish water quality, fish passage, riparian margins, Mahinga kai, native species biodiversity, runoff and bank erosion. This addresses Te Taiao, Mātauranga Māori from Ministry of Research Science and Technology

(2007), and the Mahaanui Iwi Management Plan (2013). Furthermore, the incorporation of traditional ecological knowledge into this research through plant species selection and stream health enhancement methods enhances the cultural wellbeing of the park.

5. Methods

Quantitative and qualitative research methods were used to answer our research question. Secondary data analysis of peer reviewed journals and government resources informed on the planting techniques, maintenance, and species selection for this project. Primary data was collected at four sites in Abberley Park (Figure 2). Sampling was conducted in overcast conditions on the 19th of September between 10.30am to 1pm. The weather leading up to our sampling date was generally fine with a few showers on Tuesday the 13th and Friday the 16th.



Figure 2. Map of Abberley Park and the four study sites along St Albans Stream assessed for water quality and habitat characteristics. The stream flows left to right.

5.1 Aquatic invertebrate sampling

We collected information on the MCI to assess the long-term ecological health of the St Albans stream. Using a D-net we collected a sample from each site (Figure 2) working from the downstream end upwards. At each site, the D-net was placed just above the stream bed while a colleague disturbed the sediments ~1m up stream. To accurately represent the habitat conditions we sampled 2 sites under canopy cover and 2 from the exposed reach. All material was preserved in a 2:1 ethanol and stream water solution and processed 2 days after collection.

Processing each sample individually, a 500μ sieve was used to separate out excess material such as leaves. The contents of the sieve were put in a tray with water and specimens were identified by eye then examined under a microscope to determine species when possible. From this an MCI and species richness were calculated for each site.

5.2 Water quality sampling

To supplement MCI data and provide more insight on the drivers of stream health we measured physical water quality parameters. A Hach water quality instrument measuring pH, conductivity, and dissolved oxygen (DO) was used to measure water quality parameters. Three readings of each parameter were taken at each sample site, this was averaged for each site to remove sampling error.

5.3 Site description

We conducted a habitat assessment to describe each of the four sites.

We recorded Latitude and Longitude using an eTrex® 10 GPS receiver. Co-ordinates are displayed in WGS 84 format and mapped in Google Earth (Figure 2).

Instream habitats are classified as a riffle, run or pool. Pools are slow, following eddies. Runs and riffles indicate flowing water, runs have smooth water flow and riffles have turbulent surface flows. Stream substrates were classified as either mud, silt, gravel, or pebbles.

Bank slope was categorized as flat, moderate, or steep. The bank width is the maximum realistic width of the riparian margin. Measurements were made for the right tributary (right side when facing downstream) and left tributary.

Plant species were identified and categorized as groundcover or canopy species. Canopy and groundcover were also observed. Canopy cover measures the percentage of canopy overhanging the stream. Groundcover indicates the percentage of the streambanks that are vegetated. In addition, plant species identified by INaturalist users near our study sites were listed (Table 2).

5.4 Plant species selection

Extending from the literature review, we identified suitable plant species that would enhance Abberley Park from Christchurch City Council (n.d.) and Lucas associates (n.d.) planting guides. Plant species that had low tolerance to wind, wet conditions or frosts were excluded. Species were differentiated based on

10

tolerance for sun and shade and distance from the waterway (Figure 3). Species with Mahinga kai significance as indicated by ECan, (2022) are noted.



Figure 3. Zonation of plants based on distance from waterway. Lower bank species are right next to the river, upper bank species can tolerate flooding. Crest or upper terrace, where plants are above usual flood levels (Lucas associates, n.d.)

6. Results

6.1 Water quality

Table 1 shows water quality has low variability across sites. This was expected as the stretch of stream is no more than ~150m and dependent on surrounding anthropogenic activities. The pH of the water is slightly basic but is within the 6.5-8.5 allowable range set out in the Canterbury Land and Water Regional Plan (Environment Canterbury, 2018). DO levels were great for supporting pollution sensitive aquatic life. This indicates factors that affect DO: temperature, organic matter, and flow, were at sensible levels when sampled. Conductivity measures the presence of dissolved ions in the water, hinting at the water's origin. Our conductivity measurement suggests that the water is rainfall and surface runoff dominated, with some input from Waimakariri River seepage (Hayward, 2002). There is a moderate level of ions leached from the land surface and aquifer material (Cawthron, 2022).

6.2 MCI and species richness

Table 1 also shows the MCI score at all sites. MCI values are well below the national bottom-line of 90 (Ministry for the Environment, 2020) Despite sites one and two having no riparian buffer, MCI scores

3

4

3

73.6

73.7

77.6

were similar to sites three and four, which are well vegetated. Sites one and four had gravel substrates, which could reflect higher scores. Sites two and three's low scores could be explained by their proximity to the piped portion of the stream and very muddy substrate.

 Site
 pH
 Dissolved oxygen (mg/L)
 Conductivity (μS/cm)
 MCI score
 Species richness

 1
 7.55
 9.18
 161.1
 76.0
 2

159.03

156.33

155.97

Table 1. Averaged values for water quality parameters sampled at St Albans Stream. MCI and species richness values calculated for each sample site, providing a long-term view of stream ecological health.

6.3 Species breakdown

9.17

9.12

9.06

7.53

7.52

7.51

2

3

4

All sites were dominated by worms and leeches, which are pollution tolerant species (Figure 4). Site three was the only site where a caddisfly was collected. However, an individual specimen is not an indication of an established presence in the stream, but does indicate that somewhere along St Albans Stream, conditions are favourable for these species. This is important for the future colonisation of St Albans Stream by pollution sensitive species.



Figure 4. Number of species is found at each sample location shows a clear proliferation of worms and leeches which resided in the muddy substrate common throughout the stream.

6.4 Comparison to previous water quality assessments

Blundell-Dorey et al. (2022) conducted water quality baselines at each of these sites. Conductivity has increased and pH decreased from previous baseline data. MCI scores at site three improved, while the other two are slightly worse. Worms, ostracods and mites were common across both baseline tests – with worms being most frequent. Leeches, caddisfly and caterpillars were found in our samples, but amphipods and snails were only found in previous samples.

6.5 Habitat Assessment

Site location, instream habitat, canopy and ground cover and species identification were observed in the habitat assessment. Results of the assessment are in Table 2 with supporting site images seen in figure 5.

Site	One	Two	Three	Four
Description	Exit at Abberley Crescent	Downstream of culvert	By drainpipe and big totara	Downstream of footbridge
Latitude	43 30 48 S	172 37 49 S	172 37 47 S	172 37 46 S
Longitude	172 37 50 E	43 30 48 E	43 30 49 E	43 30 49 E
Instream Habitat	Riffle	Run	Run	Run
Substrate	Gravel/pebbles	Silt/mud	Silt/mud	Gravel/pebbles
Right Tributary	Moderate slope (5m wide)	Steep slope (3 m wide)	Steep slope (5 m wide)	Steep slope (5 m wide)
Left Tributary	Flat slope (wide bank)	Moderate slope Undulate (wide)	Flat (5+ m wide)	Flat (5 m wide)
Canopy cover%	5	1	60	20
Ground cover%	90	95	40	20
Groundcover species photographed	Grass (to bank) Sedges - Carex Rushes Silver tussock	Grass (to bank) Agapanthus Silver Tussock	Ivy, mosses, ferns on edge Gully fern	Mosses, Ferns
Canopy cover species photographed	Oak Hydrangea	Weeping Willow	Totara Mistletoe Lemonwood Camelia	Kohuhu Karumu Kowhai
Plant species recorded on INaturalist			Kowhai	Maple Karamu Bay Laurel

Table 2. Bank and in-stream habitat assessment for the four monitoring sites. Results recorded on Monday 19 September 2022

Sites two and three had the muddiest substrate. Sites one and four had gravel substrates. Paths near these sites likely contributed to this. Site one was the only riffle habitat, all other sites were classified as runs.

Sites one and two have high groundcover but low canopy cover. This is because the wide riparian buffers are mostly grassed down to the water's edge, but few mature trees are present. Sites three and four have low groundcover, but high canopy cover. Understorey vegetation is low, particularly on the left tributary, but canopy cover is high, particularly at site three. Deciduous plants dominate the canopy at sites one and four, so canopy cover should increase in summer. Slopes are steep on the right side and gravel driveways limit riparian width.



Figure 5. Photos of stream sample sites in Abberley Park; a) Site one b) Site two c) Site three d) Site four

6.6 Plant Species Selection

Suitable species for planting are listed in Table 3. Sun tolerant species suit sites one and two, while shade tolerant species suit sites three and four. Species are further divided into three zones: margins, banks, and terraces, which map the distance from the waterway those species best suit. Plants already found along St Albans Stream (Table 2) match the plants recommended (Table 3). Therefore, these plants can grow successfully.

Sites	One and Two (sun tolerant)	Three and Four (shade tolerant)
Margin <.5 m from stream	Bogrush (Schoenus pauciflorus) Harakeke/NZ flax (Phormium tenax)* Kapungawha/lake club rush (Schoenplectus) Makura (Carex maorica) Pukio/tussock sedge(Carex virgata/secta) Spike sedge (Elaocharis acuta) Tussock rushes (Juncus) Upoko-tangata/umbrella sedge (Cyperus ustulatus)	Kiokio (<i>Blechnum minus</i>) Puniu (Polysiichum Vestitum)
Bank .5 to 2-3 m from stream	Harakeke/NZ flax (Phormium tenax)* Kaihikatea (Dacrycarpus dacrydoides)* Kaikomako (Pennantia corymbosa) Kohuhu/matipo (Pittosporum tenuifolium) Koromiko (Hebe salicifolia)* Manatu/Ribbonwood (Plagianthus regius) Manuka (Leptospermum scoparium) * Mikimiki (Coprosma propinqua)* Rohutu/NZ myrtle (Lophomyrtus obcordata) Ti kouka/Cabbage tree (Cordyline australis) Weeping mapou (Myrsine divaricata)	Horopito/pepper tree (Pseudowintera colorata) Kakaha/Bush Lily (Astelia fragrans) Kohuhu/matipo (Pittosporum tenuifolium) Rough pigfern (Hypolepis ambigua)
Terrace >2-3 m from stream	Horoeka/Lancewood (<i>Pseudopanax</i> crassifolius) Houhere /Lacebark (<i>Hoheria Angustifolia</i>) Karamu (Coprosma Robusta)* Kapuka/broadleaf (<i>Griselinia</i> littoralis) Kohuhu/matipo (<i>Pittosporum tenuifolium</i>) Kowhai (<i>Sophora microphylla</i>)* Manatu/Ribbonwood (<i>Plagianthus regius</i>) Matai/black pine (<i>Prumnopitys taxifolia</i>) Mikimiki (<i>Coprosma rubra/virescens</i>) Rohutu/NZ myrtle (<i>Lophomyrtus obcordata</i>) Ti kouka/cabbage tree (<i>Cordyline australis</i>) Totara (Podocarpus totara) Whauwhaupaku/five finger (<i>Pseudopanax</i> <i>Arboreus</i>)	Horoeka/Lancewood (Pseudopanax crassifolius) Houhere/lacebark (Hoheria angustifolia) Turutu/ink berry (Dianella negra) Karamu (Coprosma robusta)* Kapuka/broadleaf (Griselinia littoralis) Kohuhu/matipo (Pittosporum tenuifolium) Poataniwha (Melicope simplex)

Table 3. Species appropriate for each site and zone (Christchurch City Council, n.d.; Lucas Associates, n.d.). Species that have cultural and Mahinga kai significance are marked by an asterisk (ECan, 2022)

6.7 Limitations

Throughout our project there were limitations we came across which could be considered for future work on the St Albans stream.

- 1. The lack of experience in measuring the MCI value in the stream could much improved. This was evident in identifying species, as was the case in site 3 where a caddisfly was misidentified as a stonefly species.
- 2. The water quality parameters we measured were only reflective of the streams' conditions on the day they were taken, extrapolation of results is inaccurate. More measurements need to be taken to consider the different weather, seasons and activity affecting the stream.
- The limited research and literature on St Albans stream also made it difficult to find any sources reference from. Research by Blundell-Dorey et al. (2022) is the only literature available on St Albans stream water quality.
- 4. While we contacted Mana Whenua, we only received an email reply from Rehua Marae and were unable to meet with Rehua Marae or Ngai Tuahuriri members. Much of our community engagement was extrapolated from previous surveys. Therefore, community perspectives may be missing from this report.

7. Recommendations

7.1 Planting

We have split the sites into zones along the stream. This includes sites three and four, which are well vegetated and sites one & two, which are poorly vegetated. Plants would be partitioned between three zones based on distance from the stream (Figure 3). This includes the margin (<0.5 m from stream), lower bank (0.5-3 m from stream) and terrace (>3 m from stream).

After examining the current riparian conditions of St Albans Stream, we recommend planting efforts focus on sites one and two. Comprehensive riparian planting across the three buffer zones is needed to remedy low vegetation cover. Sites three and four have established vegetation, meaning additional understory plants are recommended to reduce erosion and bank instability issues.

We recommend making the riparian buffer 5 m wide. Sites three and four already have wide enough buffer zone on both sides. However, the right tributary at sites one and two cannot have a 5m riparian buffer due to the gravel driveway. We recommend using as much space as possible to maximise effectiveness (Parkyn, 2004).

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7.2 Water Monitoring

Water quality testing confirmed the poor ecological state of the stream. Riparian planting will have the greatest impact on biodiversity and bank stability, as it has at comparable sites where enhancement projects have been undertaken (Suren & McMurtrie, 2005). To assess whether riparian planting is improving stream health, it is advised to continue monitoring the MCI and physical parameters. Improvement can then be detected by comparing it to baseline data. The MCI is the better method and can be done annually. However, physical parameters are an easy alternative, provided measurements are conducted seasonally. Continued monitoring could involve the community, building awareness and increasing the value placed on the stream within the local community.

7.3 Planting and maintenance methods

Effective preparation, planting techniques and long-term maintenance is essential to the success and longevity of the riparian planting at St Albans Stream. Preparation for the lower half should be mulching the soil, while the upper half will need spot spraying to remove weeds and have vegetation cleared to make space for new planting. The most effective method of planting is to use native seedlings for understory plants. Whip cuttings are effective for trees and larger shrubs to have access to groundwater.

For maintenance, weeds should be spot sprayed using a biodegradable herbicide. Diseased plants should be replaced with new species to maintain density and diversity in the riparian buffer. A temporary fence could be installed to minimise trampling from animals and people. Maintenance of the riparian zone is of high priority, as to ensure the best survival rates for the plants and reduce time and resource needs into the future.

7.4 Engagement

In future, our project should increase engagement with the St Albans community. They should be offered opportunities to volunteer, especially in the initial planting stage. There is potential to share the research with the community. Residents could give feedback on the recommendations made in the report. This could even promote stewardship in the park. This could be done through social media, or information from the community centre.

Dialogue and communication with Rehua Marae, council, SARA and the community should be strengthened. This is to improve expert knowledge on decisions regarding the stream, maintain support for the project and increase awareness of the St Albans Stream contribution to the Avon-Otakaro catchment.

8. Future Research

Questions raised by this project that could be the aim of future work include:

- Measure bank conditions parameters e.g., compactness, soil order, soil pH.
- Expand water quality parameters measured e.g. salinity, nitrates
- Investigating public perception of exclusively native planting in a heritage park
- Improving the instream habitat with other stream enhancement techniques

9. Conclusions

We have recommended native riparian planting methods that should be applied in Abberley Park to improve St Albans stream health. This includes plant species and methods to maintain them. We conclude that site one and two should be of highest risk of erosion and bank instability. It is recommended that species selection match shade and water tolerance by stratifying over the three riparian zones. We recommend site preparation and maintenance techniques essential to increasing plant survival and supress weeds and disease. Future water monitoring procedure is acknowledged to measure water quality objectives. The work done for this report is dependable, but there are limitations, especially regarding water quality and MCI measurements. Information on species and planting methods is very reliable as there has been extensive external research on the topic.

Acknowledgements

We would like to acknowledge the teaching staff and faculty members Rita Dionisio, Simon Kingham, Jillian Frater, Justin Harris and John Revell for their feedback and contributions to the project. We would also like to thank and acknowledge our community partners Emma Twaddell and Shamani Gill for their co-operation and passion, showing us around St Albans Stream and providing us with relevant background information on the great St Albans community.

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Our Urban Forest – For Òtautahi Christchurch

Submitted to the Christchurch City Council Attention: Ann Tomlinson Te Hononga Civic Offices, 53 Hereford Street, Christchurch 6th March 2023

Tēnā kōrua I tēnei ata

Thank you for the opportunity to submit on the Urban Forest Plan.

Reading through the document, I have a fear that while it states "Urban trees are a key tool to help us meet the challenge of our climate and ecological emergency", it is really only about trees, almost individual trees and us.

Climate

Urban trees sequester carbon only for the life time of the tree. While this is an important factor at the present time, when the trees die and breakdown, the sequestered carbon will be released into the atmosphere. It is therefore important to discuss this fact when choosing tree species and their lifespan. Trees, therefore, cannot be considered as meeting the challenge of climate change; rather postponing the negative effects to a later generation.

Ecology is About Interactions

With regard to our ecological emergency; this aspect must only be discussed in relation to the true meaning of ecology. Ecology is the study of the <u>interactions</u> that determine the distribution and abundance of organisms and communities. The environment of a tree consists of all those factors and phenomena outside that tree that influence it, whether those factors be physical, chemical or other organisms.

To create sustainable populations of trees in our urban environments, we must have an understanding of that environment and how specific species of trees will influence and be influenced by their surrounding physical, chemical and organic space. Adhering to a rule of thumb of 'right location, right plant, right function' may avoid many of the problems listed on page 5, but will not create the desired outcome required for our ecological emergency. All of the negative aspects listed on page 5 are only about people and infrastructure – these are important but surely not the only reasons for selecting the right trees. Selection must be also based on how specific species interact with each other, with all other organisms and the surrounding environment.

The last sentence on page 5 states that "better integrated design and planning to select the right species and ensure the space is appropriate for the tree" – integrated design and planning cannot replace sound ecology. There should be something in the document about "ecological interactions".

Otherwise, we are planting trees in silos.

Tree Community Size and Edge Effects

When trees grow on the edge of an area they are exposed to more of the elements. Many patches of trees today are small in size, with plants growing on the edge exposed to higher levels of sunlight, wind, heat, weeds, greater fluctuations in temperature and lower levels of humidity than those growing in the more sheltered interior. This creates an edge effect. It is therefore, important to maximise the core and minimise the edge. The size and shape of the newly treed area can have a large bearing on the ecological success of the area. If the area is too small it could have a very limited opportunity to be sustainable. Edge effects may pervade so that the ecosystem will gradually change and lose its integrity. A minimal length of edge or low perimeter to core area ratio is the most desirable.

Distribution of the Proposed Urban Forest

Under Guiding Principles p6, you have "For everyone" The urban forest will be distributed across the city to support the wellbeing of our residents and the natural environment". The present canopy distribution as shown on p8 illustrates less than 5% and 10% canopy cover, in some areas in the East of Christchurch, i.e. Brooklands to Taylors Mistake. While the Plan sets out targets for increasing tree canopy cover city wide, it is hoped that some areas will be left vacant for ecological diversity and our iconic bird species that do not nest in trees.

I call your attention to two gull species:

Red Billed Gull, tarapunga, Chroieocephalus novaehollandiae scopulinus

The red-billed gull is a protected native species that has recently suffered huge declines and is now described and "nationally vulnerable". The species are now protected under the NZ Wildlife Act. 1953. It normally feeds on small fish, shell fish and worms, and sometimes, berries, lizards and insects. Tarapunga nest in dry grassland of the South Island Coastal Marine Area.





The black-billed gull, tarapuka, Chroicocephalus bulleri, is found only in New Zealand – it's ancestors having arrived from Australia around 250,000 years ago. Mainly breeding on braided rivers it is also found in grasslands of the South Island Coastal Marine Area. Tarapuka is described as "nationally critical" and rapidly declining.

Conservation as a Best Management Option

It is hoped that areas of the coastlands will be left vacant for other types of ecosystems and species.

Mihi,

Ann Kennedy Environmental Science Environmental Management



To whom it may concern,

I write to you on behalf of Forest & Bird Youth Christchurch to say that we as an organisation strongly support the Otautahi Christchurch Urban Forest Plan and believe that this forward-thinking approach to combat canopy loss and start regenerating our forests is a step in the right direction for Christchurch. Trees form a crucial component of our city's response to the climate and biodiversity crises. The targets set for canopy cover are certainly respectable, but we believe that these should just be the start, and that overshooting these goals should be actively encouraged, as the benefits of the urban forest grow with the number of trees planted. As we have seen over the last few weeks, extreme weather events are becoming more and more frequent in Aotearoa and as illustrated many times in scientific literature, forests can be a major stabilising force during these events. Whether by lowering air temperatures during heatwaves, absorbing heavy rainfall or preventing erosion, an urban forest would provide a kind of armour to see our city through the coming decades. We believe that nature's benefits should be accessible to all Christchurch's residents and we fully support the move towards equitable canopy cover across Otautahi. The importance of native forests cannot be understated when moving forward with this Urban Forest plan. In the future, our group would ideally see the return of beloved species to all parts of Christchurch, including kereru, tui and other bird species, as well as native reptiles and invertebrates. Combining the planting of crucial native species for food and habitat with a strong approach to predator control could see this vision realised, and we appreciate the addition of ecological corridors to this plan. Consulting with a group of specialist ecologists would be the best way to ensure that the right species are selected, with the right structuring (e.g. a layered canopy structure including other important forest species including lichens, mosses, shrubs etc.). Their expertise will help to preserve our city's natural and cultural values, and to ensure that all communities can thrive under this new canopy. We would also like to stress the importance of the Christchurch residential red zone, and believe that these areas should be places where new and existing canopy can thrive, in accordance with the Otakaro Avon River Corridor Regeneration Plan. As one of the largest youth-led environmental groups in the city, we support this vision for the city's future. An investment into Christchurch's canopy is one that will benefit our region for generations.

Sincerely, Ella Peoples

Forest & Bird Youth Christchurch

Submission from the Papanui Heritage Group on Our Urban Forest Plan for Otautahi Christchurch.

Who we are: The Papanui Heritage Group (PHG) was founded in 2001. Although a small group we have maintained a committed interest in developing and presenting submissions to the City Council on issues which affect our suburb. The definition of Papanui has changed over the last 150 years and the 2022 redrawing of the ward boundaries for the local body election excised parts of South Papanui while extending the new northern boundary of the ward to the Styx River between the Main North Road and the Northern Arterial.

Papanui's history based on trees

Papanui's genesis was based on trees. The Papanui bush, an area of approximately 70 acres, was the only local source of timber available to English settlers who arrived in 1850 and built the houses which were to develop into the city of Christchurch. Such was the demand for the totara and kahikatea that the Papanui block was cut out by 1857.

Our submission in summary: In general we support and endorse 'Our Urban Forest Plan', but raise some issues of concern around the level of protection for existing trees in Papanui, especially those on private land, the trees on the 15 Memorial Avenues in Papanui, plus the tree-lined streets which adjoin them.

The four goals of the Urban Forest Plan: Plant; Nurture, Protect and Involve.

The PHG supports the four goals of the plan and notes that while aiming to achieve a sustainable growth in forest canopy cover, the aim is to distribute the canopy equally, with no ward having less than 15 per cent total cover.

Looking at the colour-coded map on p.8 it's evident that there is much to be done in the Papanui Ward, where only one small corner reaches the 20 per cent level, while the older established part of Papanui achieves a 15 per cent level. Most of the ward (in the northern part) is in the 10 per cent zone. More land may need to be purchased by the Council in this area in order for extensive tree planting to take place.

Goal 1: 'Plant'

The Papanui Heritage Group is concerned about the loss of mature trees in the older part of Papanui, often as the result of building development, and supports the proposal to require financial contributions from developers who remove trees. The overall effect of this policy , however, could be a transfer of trees from Papanui, to other parts of the city. There is, however, certainly public land in the traditional Papanui area (which the group knows best) where more trees could be planted; for example the replanted Papanui Bush area (Bridgestone Drainage Reserve); the Papanui Domain; Marble Wood Reserve and Edgar Macintosh Park.

Goal 3: 'Protect': Protecting Mature Trees – especially Papanui's Memorial Avenues

The PHG wishes to comment in more detail on Goal 3, 'Protect'. Here we read that 'Our urban trees are valued and looked after as critical infrastructure'. Our experience on the ground is that this is not happening. Instead Papanui is experiencing a loss of mature trees mostly on private property, but we have also noted a loss of street-side trees especially when new buildings are under construction.

PHG has a particular interest in Papanui's 15 Memorial Avenues, each of which is indicated with a bronze plaque which proclaims 'Papanui Memorial Avenue, To the fallen, 1939-45'. The streets were planted in the 1940s in exotic trees, as was the custom of the day and over the years have sometimes been replaced and replanted. The 'Memorial Avenues' are: Alpha Avenue, Claremont Avenue, Condell Avenue, Dormer Street, Gambia Street, Halton Street, Hartley Avenue, Kenwyn Avenue, Lansbury Avenue, Norfolk Avenue, Perry Street, St James Avenue, Scotston Avenue, Tomes Road and Windermere Avenue.¹ Together they provide historical context to Papanui residential areas and should be retained as they are. In September 2022 the PHG was delighted to learn that the City Council had recognised the 15 Papanui Memorial Avenues (trees and plaques) by adding them to the District Plan's Schedule of Significant Historic Heritage for protection. We presume that the trees will be protected by the provisions in the Council's Tree Policy, but as heritage items we would now expect them to have a greater level of protection. We would also ask that attention be given to remediating some of the loss of trees to the avenues. One example is the Blighs Road end of Condell Avenue, where numerous trees have been removed from the roadside in front of recent building developments. It should also be pointed out that there is no plaque indicating a Memorial Avenue at the Blighs Road end of Condell Avenue.²

We would also like to raise a question about whether the Council's policies and plans are all compatible, for example the Tree Policy the Urban Forest Plan and the District Plan Changes for housing intensification. We have a concern that some of Papanui's tree-lined streets, including those that adjoin the Memorial Avenues, may be vulnerable to developers working under the new intensification regulations, as raised in our submission on the 'Housing and Business Choice Plan Change' last year.

Goal 4. 'Involve': 'Our urban forest is nurtured by partnerships and participation'.

We strongly support the intention of ensuring that local groups and individuals have a strong sense of ownership, with opportunities to be 'part of the management and growth of our urban forest'.³ We also endorse the recognition that education and advocacy must play in order that residents understand the importance of trees.

It is pleasing to note that 160 years after the loss of the 'Papanui Bush' its partial regeneration is underway thanks to the vision and energy of PHG member Denis McMurtrie and the muscle and enthusiasm of the local Rotary club. Initially the whole project was made possible by the donation of the land by the Bridgestone Tyre Company. Denis has also worked through schools with students being invited to learn about the trees and participate in weeding and planting.

This is a great example of partnership, participation and community involvement and one which the PHG is proud to have played a small part in.

Defyd Williams - chair Papanui Heritage Group

¹ A sixteenth Street, Tillman Avenue also has a plaque designating it as a Memorial Avenue, but was not in the original list of 15 streets.

² There is a plaque on the corner of Matsons Avenue and Condell Avenue which can mislead people into thinking Matson's Avenue is a Memorial Avenue. Perhaps this plaque should be moved to the Blighs Road end of Condell Avenue.

³ Our Urban Forest Plan p 16.

Submission:

Otautahi-Christchurch Draft Urban Forest Plan 2023

Submitted by Paul and Fay McOscar

Outline:

While such a "plan" would guide and ensure a tree canopy is maintained across the City and its urbans areas, I believe the Council needs to re-think its pre-planning processes before it adopts such a plan.

Mention is made of the difficulty of protecting such trees (shrubs) on existing private land. I sense difficulties enforcing developers who have been permitted to build high residential multi-unit structures on suburban properties that previously housed a medium sized family home. Their objective is to maximise that land use (within Council rules) that may leave little room for planting. If the Council succeeds in tree planting requirements on these properties, what issues will be caused to neighbours from leaf litter and canopy shading for medium to larger sized trees, alongside boundaries. From current observations in most cases there is little garden space, apart from boundaries to plant sizeable trees. Developers when (enforced) planting is complete will have little concern in the years to come regarding any shading issues caused to the neighbours.

The draft preliminary information names several Christchurch suburbs where the tree canopy is minimal. Obviously, they are generally lower socio-economic areas, where either low-cost homes (and or rentals) exist. Landlords are more likely interested in the economic returns rather than beautification. In meeting any new imposed Council rules, this may affect rental charges. Where home ownership occurs in these areas the homeowner may not have the discretionary income to spend on beautification.

Tree Roots/Surface Disturbance

Identify species that cause interference to underground infrastructure, footpath/curbing disruption.

Issue: You will be aware of the number of species of street trees that crack and raise footpath levels thereby creating uneven surfaces. I'm aware over the years several sports areas such as tennis courts that have required extensive remedial work caused by adjacent tree root spread. Recently, within my neighbourhood, some 17 metres of asphalt footpath and 9m of curbing were replaced caused by 4 fifty plus year old gums. These vary from 1 metre and less off the footpath. After 7 months the footpath is already cracking and being raised by the gum roots. I estimate the cost would have been in the vicinity of \$9000 to complete this work whereas removal and replacement by a more appropriate species would have been cheaper. From a safety aspect there are numerous cases where elderly people have tripped on uneven footpaths causing injuries, etc.

Tree Canopy Size/Height

Consideration in the design stage, needs to be given to trees, when they are near maturity or when they attain maturity and the effects that they have on adjacent private properties. Winter shading is a particular problem particularly where non-deciduous groupings occur. The density of the canopy should also be considered. Designers need to remember trees increase in size each year.

Issue: The Council has strict rules regarding building setbacks and recession planes to prevent sunlight being inhibited on neighbouring properties. Yet the Council takes little or no responsibility for these situations relating shading from open space/park trees. There are numerous examples

where trees on open spaces and parks block sunlight on neighbouring properties. It has proved very difficult under current Council policies to get any redress on trees that cause, particularly winter shading. Some of this may relate to inadequate thought given at the design stage where near mature trees have exceeded their anticipated height or groupings have become too dense. In these circumstances preference needs to be given to deciduous plantings.

Leaf Litter/Shedding

Parks planners must become aware of the ongoing leaf litter and shedding of a tree's greenery, plus bark and the maintenance costs, that the Council is faced when carrying out street gutter sweepings and call outs to unblock drains.

Recognition that some species such as cedar/pines, shed their needles continuously throughout the year whereas deciduous species generally occur in autumn. There is also an issue of eucalyptus gum nuts and oak acorns, dropping over cycle/walkways that can lead to people and cyclists slipping. Another aspect is the nuisance, among other trees such as sycamore, cedars, pines spread their seedlings when wind blown over vast areas. On our property we get these types of seedlings germinating in our garden.

Issue: While mature deciduous street trees such as Liquidambars can create vast quantities of shed leaf litter this requires extensive leaf collection over the shorter autumn period. The issues with cedar/pines are that their wind-blown leaf litter is light and easily susceptible to being washed by rains into street gutters and carried to and with added silt block drainage sumps. In my neighbourhood even 5mls of rain over a short period is sufficient to carry this leaf litter along gutters to drains. A build up can cause a blockage anywhere along the street. In the last week of February, after some 3 days of intermittent rain with about 35mm falling, this blocked 2 nearby drains with a roadside lake forming for 3 days. The lake ventured out past the centre roadway white line. This area should be tasked as high maintenance with regular gutter sweepings, rather than as in early January this year with 2 sweepings occurring in 10 days and then nothing since. After the water finally dispersed a neighbour living opposite cleared the two drain covers of the silt and leaf litter. This neighbour has carried out this task regularly as the Council rarely checks this area. Yet Council maintenance vehicles pass this way regularly. Staff do not seem to be interested in stopping, using their initiative to collect rubbish or clear a drain.

Eucalyptus gums are notorious for shedding vast quantities of bark. Not only is this an eyesore around well-maintained parks surfaces but contributes, when blown by the wind into gutters and drain covers and assits the blocking of drains.

With judicious planning the Council should be able to reduce the amount of staff and machinery time spent on unnecessary parks and street/gutter maintenance thereby reducing allocated maintenance budgets. (As an aside when visiting Scotland several years ago we observed a woman planting out a border. On complimenting her work, she advised that she was a volunteer, and the planting cost was being met by her neighbourhood. That area Lothian Council to manage their budgets, had cut back on all park tree and shrubbery improvements. I believe that the Christchurch City Council may be in a similar position in the forthcoming years.)

Limb Die Back/Shedding

Parks maintenance staff will be well aware of the number of tree species due to aging, that have branch die back, or are susceptible due to the brittleness of the tree structure (particularly when leaves are saturated from rain) that have limbs that break in strong winds.

Issue: This is obviously a safety concern for park users in windy conditions. I recall some years ago a death caused by a falling limb, occurred in Hagley Park. Such trees should be kept well clear of cycle and walkways.

Wind/Rain Issues

With "climate change" and the likelihood of wetter ground conditions Council needs to consider the likelihood, that during windstorms and heavy rain periods, there is a danger of shallow rooted trees toppling.

Issue: This has been demonstrated on a number of occasions in the past and more recently with the NI Cyclone. Such species if there is a planting preference for that specie, need to be planted and positioned well away from cycle/walkways, structures and roadways that are likely to cause injuries or material/structure damage.

Shallow Rooted Trees

In the past park's planners/landscapers, from observations, when going about planning planting designs, tend to visualise the type of tree that has grown to a semi-mature state. In visualising that tree they think of shape, colour and in some ways their own preference in their design process.

From observing such plans these may be grouping such specimens in plots then leading on to a string line generally around the boundaries of open space/parks. In terms of grass berm plantings there are numerous tree lined streets where trees planted in excess of 50 years ago tower above adjacent properties and on leaf fall are over shin deep in gutters and on property frontages.

Issue: The other issue with planting inappropriate species is the root damage caused to foot paths and underground services. Over the years I have observed on my regular neighbourhood walks a number of elderly people, including myself, stumble on uneven footpaths caused by tree root growth.

Within my neighbourhood some 7 months ago the Council dug out about 10 metres of footpath and curbing due to gum tree roots creating an uneven surface including cracking of the curbing. The offending trees are less than a metre from the footpath edging. These four 60-year-old plus, specimens continually drop limbs some up to 15cm thick. The newly laid asphalt (in some places is far from horizontal), is already starting to crack with surface root pressure. (As a guesstimate I'd suggest these unnecessary repairs would have cost in the vicinity of \$10,000. I consider it would have been cheaper to remove them and replace them with more appropriate specimens.)

Summary:

Over the past 20 years I consider staff have become more introverted from servicing the community and community consultation. Rather than meeting the needs of the community as per the Local Government Act there is an apparent air we have the responsibility to manage Council affairs the way we want. While the Council CEO is the employers of staff a number trend to hide behind this saying any contact must be through the executive officer.

I believe planners need to consider the above data when planning for park and open space areas. The objective would be to prevent the planting of inappropriate specimens that will cause later issues or are high maintenance and to a certain extent unsafe. Each year the Council, at budget times, grimaces at its annual operating cost and a fight ensues as to which budgets are trimmed or deleted. As the City expands its assets, its operational and maintenance costs will also. It appears its maintenance expenses are being trimmed each year.

Regarding encouraging canopy planting on private property, I would not support the Council subsidising tree planting on private property.

I also believe the Council needs to look at planting greater levels of native species in its shrub and tree borders. Partially to encourage and increase in the increase of native birdlife.

Signed

Paul McOscar



6 March 2023

Christchurch City Council Te Hononga Civic Offices 53 Hereford Street Christchurch Central Christchurch 8013 engagement@ccc.govt.nz

Submission on the Draft Ōtautahi-Christchurch Urban Forest Plan 2023

This is a submission made on the Draft Ōtautahi-Christchurch Urban Forest Plan 2023 ('the Plan').

I would like to thank Christchurch City Council for the opportunity to make a submission.

I do not wish] to be heard on my submission.

I currently live in the Hornby Ward, and my submission addresses the urgent need to address the low tree canopy cover in the Hornby Ward and promote the 'Hornby Bush' initiative.

In making this submission I acknowledge that the Plan sets out how we in Ōtautahi-Christchurch will grow our tree canopy and sustain a thriving urban forest of healthy, diverse and resilient trees. Furthermore, I acknowledge that the Plan sets our direction and priority for planting, nurturing and protecting trees in Ōtautahi-Christchurch now and in the future.

I acknowledge that trees provide a range of social, environmental, cultural ecological and economic benefits and services that enrich the quality of urban life and contribute to a well-functioning urban environment.

It is critical that the principle of equitable tree covers informs plan implementation through priority urban forest afforestation areas which should be specified in the Action Plan (Appendix 1).

I support Goal 1 of the Plan with the target of >20% tree canopy cover city-wide by 2070. I strongly support the direction to distribute canopy cover equitably, with no ward having less than 15% canopy cover.

I we support in part the 2070 target canopy cover for open spaces being 40%. This is due to the need to address the inequity of public space on a ward by ward basis in the first instance. This requires meeting the level of service targets for the distribution and accessibility of open space being 80% of urban residential properties are <500m from a park (any type of park except a utility park) at least 3000m2 in size. It also requires meeting provision targets, being 20ha/1000 people for Regional Parks and 5.9ha/1000 people.

It is clear that the large industrial component of the Hornby Ward has skewed these level of service targets due to large areas without a resident population so there is less open space in the ward in the first instance. Without addressing the inequities of open space, tree canopy cover targets for open space will "lock-in" inequity.

It is important to recognise that the 15% tree canopy cover target for a ward could be achieved with roadside planting and plantings/retention of trees on private land, which does not have the same material benefits as forested open-space.

Given the baseline state of the Hornby Ward, I/we recommend that the Plan is amended to include priority urban forest afforestation areas which should be outlined in the Action Plan (Appendix 1). I consider that this must be included in the 2024-2034 Long Term Plan as well as the creation of a 'Hornby Bush'.

The Hornby Ward must be a priority for the Plan, particularly due to the concentration of industrial land uses and the propensity for the ward to struggle with urban heat island effect, increasing pluvial floods and the unhealthy concentrations of dangerous particulate matter in the ward.

It is critical that the Action Plan (Appendix 1) outlines the steps that will be taken to involve those with interests in the Hornby Ward for addressing the entrenched inequity of tree canopy cover in the ward.

I would like to see funding to achieve the plan have some financial weighting that sees programmes in the low canopy wards be given priority and work with the local schools and interested groups like the Greater Hornby Residents Association in ensuring the Hornby Canopy rate increases significally rather than be the poor cousin compared to other wards.

Currently there is funding allocated to projects in wards that already have a significant tree canopy when compared to other wards. We acknowledge Banks Peninsula will always be an exception.

I acknowledge that to be successful, Council will need to fund a large-scale tree planting programme across the city. I reiterate that there must be thoughtful and careful consideration of how to prioritise and fund large-scale tree planting.

I support the action to undertake a desktop analysis of our city to locate viable planting spaces across Council land. This should be accompanied with corresponding action to prioritise afforestation sites on the basis of the inequitable distribution of tree canopy cover, such as the Hornby Ward.

I strongly support the action to assess suburbs with low canopy cover to determine why it is low and determine what can be done to increase it. This action must be partnered with Goal 4 'involve' including the local communities of areas with low canopy cover.

I strongly support the action to target new planting projects in areas with low canopy cover. I also strongly support the action to identify where land may need to be acquired for the purpose of increasing tree planting, particularly in areas of low canopy cover and, where possible, in association with achieving other Community Outcomes. I support the creation of a 'Hornby Bush' with native trees and possibly future ecological connections to the lower slopes of the Port Hills and the Waimakariri River.

I support the action to plant exemplar plots of different species in a range of environments, to foster public understanding of 'right tree, right location'. The Hornby Ward must include exemplar plots.

I would like to see funding of Fruit Trees in our area given a priority due to the low socioeconomic areas that exist in our ward.

I would like to see more attention paid to funding trees in and around the start of the Paparua Stream as it weaves it way through Broomfield and the Industrial Area of Waterloo Road and then into feeding both the Avon and Heathcote Rivers.

I would like to see due to the new City Plan proposed for our area and the high intensification that will come with it in the Hornby Ward a real commitment from the City Council to make sure our Ward does not decline further with its tree canopy and they we do not become the tarmac jungle of the West.

Rautia.

Submitted by:

Rose Nutira Dated: 6 March 2023









Our Urban Forest Plan for Otautahi Christchurch 2023

Introduction

We are a social enterprise that works in the community and environmental wellbeing space. Our biggest current project is a Regenerative Communities Pilot based in the King George V Reserve – a Christchurch City Council reserve in South Christchurch.

The project has been going on for two years. In this time starting from scratch, we have grown a core community of 25 volunteers from the surrounding area who are actively engaged in the care and enrichment of the tiny forest that is flourishing there. It is now over 30 years old and so natural regeneration is now wondrously happening at apace.

Because this is a pilot project everything that we are doing is being written up and in about a year our key learning will be documented for all interested parties to read. The main points we are making in this short submission are deeply informed by what we have learnt so far about community engagement in natural places.

Inspired and informed by the mahi we have been doing in the Regenerative Communities Pilot, in partnership with Te Hapu o Ngati Wheke and the Christchurch City Council, we have developed a proposal for a new scoping project we call "the Otautahi Patchwork Forest". It addresses a need that we consider is a gap in Our Urban Forest Plan in its present form. We have applied for funding from the CCC Sustainability Fund and await an outcome.

Overall, we support the plan and its objectives. We see a need to significantly grow our urban forest canopy in order to address the loss of biodiversity crisis, mitigate and adapt to the growing climate crisis, and to enhance the livability of our neighbourhoods.

The main points we make address the gaps and weaknesses we see in the plan.

1. The Invisibility of Community-sector land and its's potential

On page 6 under "goals and targets" the plan acknowledges the need for achievable targets for land other than CCC land. These are then listed: "residential, commercial, industrial, and streetscapes". Community-sector land is overlooked here and throughout the rest of the document. This is a real weakness of the plan. For the success of the plan all potential land for forest cover must be included. By community-sector land we would include as examples – faith-based communities, sports organisations, educational communities, marae, health-based organisations, community trusts and so on. There is potentially a lot of land suitable for greater forest cover owned and administered by community organisations. We believe engaging with the community-sector around their land use could have double value. e.g. Potentially a church decides to convert lawn to a grove of trees, and in the process members and their whanau become motivated to plant trees on their own residential land. There is a multiplification effect. Our "Patchwork Forest" project proposal addresses the potential of this sector to grow the urban forest.

2. The importance of urban microwilding

In the first goal, "Plant", on page 17, the plan proposes a "strong focus" on road-side planting. It will be good to see more road, and streets treelined and transformed into avenues. However, by

making this the emphasis there is a very real danger of losing much of the biodiversity gains that could potentially be made in growing the forest canopy across the city. We need to aim for something greater than more trees dotted through the urbanscape. There is much talk about highdensity housing. We need a parallel growth in high-density forestation. The key to this is urban microwilding. Micro forests throughout the city like a patchwork so that we move from having some forested areas in the city, to being a city-in-a-forest.

More biodiversity gains come from microforests, than from single trees. The plan promotes greater biodiversity on page 11, but this emphasis on street-side trees could undermine this important goal.

There is also a potential undermining of diversity in choices made for single trees planted on private land. People will plant what they like or know rather than what is best for overall diversity. Encouraging microwilding could overcome this possibility.

As well as benefiting biodiversity microforests are more regenerative than single trees. As they mature, they begin to self-regenerate. They have the potential to reduce the need for further planting. So, this approach is ultimately more cost-effective. We have seen this happening in King George V Reserve.

3. Community-based reforestation and devolution of power

There is a lot of talk in the plan about community involvement in achieving the vision and goals. We often hear the inspirational phrase: "It takes a village to raise a child". We have come to use the phrase "it takes a community to raise a tiny forest".

On page 16 under "The Way Forward" the plan emphasizes the importance of all people and groups having "a sense of ownership over the long-term wellbeing of our urban forest, so we need to continue to increase the opportunities for local communities to be part of the management and growth of our urban forest".

In our experience instilling and growing this sense of ownership and engagement comes from intentionally keeping it local. People want to be engaged in their local communities. This is why we prefer the regenerative approach to the conservation one. The regenerative approach is grounded in being local and growing deeper relationships between place and people.

It is always easier to get people to come from all over to plant trees. It is much more difficult to build a team of people who will commit to nurturing and protecting what they have planted in a consistent and ongoing way. By keeping it local this is much easier. People see the local tiny forest as an extension of themselves and their place.

In our experience tree maintenance is best done by empowered, informed and resourced locals. Not by contractors. This is because having a relationship with the forested area or trees is crucial to good care. Relationship rather than contract bears best results. Time and again we have seen how contractors harm trees through lack of care and ignorance. e.g. destroying small selfgenerated seedlings because they don't recognize them or even know they are there. Whereas the engaged regular volunteers do know they are there and protect them.

If the plan is dependent on strong community involvement and engagement in planting, nurturing and protecting, and if we are growing the overall forest cover of the city, there will need to be some devolution of power to the community to achieve this. CCC resources are already overstretched. Current volunteer agreements that community leaders sign on behalf of community groups will need to be revised to enable this devolution to take place.

Healthy community groups that are engaged for the long-term also are regenerative. Their leadership emerges and is nurtured from within. They are best established utilizing good community development principles. They don't just happen. They need resourcing and can't be taken for granted.

4. Education through engaged people

There is a recognition in the plan of the importance of raising awareness and educating the public. If communities are to be deeply engaged in implementing the plan their action needs to be wellinformed, but there also needs to be a recognition that people mostly learn through their involvement. Many have learnt what they know by being engaged alongside better informed and more knowledgeable people

These educators and mentors are citizen scientists and are growing in number

across the city. A way needs to be found of better utilizing this huge resource if our

urban forest is to grow and flourish. Online resources are important as is the

production of other educational materials, but there is no substitute for learning

through our relationship with passionate and informed others.

5. Tree cover targets

Given the need for urgent action to help mitigate and adapt to growing climate disruption we believe the targets in the plan for canopy cover are not ambitious enough. Instead of aiming for 20 per cent coverage by 2070 we should be aiming for 30 per cent. Rather than aiming for a minimum tree coverage of 15 per cent in each ward, there should be specific targets set for each within ambitious timeframes.

6. We support the Opawaho Heathcote River Network call for greater tree planting on the hills as well as along the waterways. Only this twin focus will help to mitigate increased flooding events, as well as increased fire risk.

7. Resource allocation/Funding

On page 21 it says that "most of the funding required to meet the targets of the Urban Forest Plan will go into planting trees". From our experience of working with a community on the ground this is a significant weakness of the plan. Underlying this allocation bias is an assumption that the large community involvement required for the plan to succeed will be done with minimal or no

resourcing. Goals 2, 3 and 4 all need realistic funding if they are to be implemented well.

This would mean stronger CCC staffing so that on the ground relationships are stronger. It would also mean resourcing for good community development and relationship building to be done across the different sectors engaged in implementation. It would mean giving back to volunteer groups who give back to the city. Healthy relationships and processes are reciprocal and not all one way. It would also mean strong resourcing of the educational component both written resources and community-based people resources.

We cannot grow our urban forest with existing or diminishing resources and funding, there will need to be an increase if the plan is a priority for our city. These resources will need to be used not just for putting plants into the ground, but for supporting the people who do this, and then who continue to care for the trees.

8. Importance of language

For the success of the plan in engaging ordinary people and communities careful use needs to be made of language. We need to use language that engages rather than alienates. One example from the document is on page 13 under "Issues to be considered". The first section here is headed "trees as part of core infrastructure". Infrastructure is not a word that engages. It is not a relational word. If we want to encourage the people of the city to become involved and to participate, we need more relational language than this e.g. "living community". So, we could talk about how trees are a vital part of our community. Another example is 'regenerative' rather than 'sustainable'. The latter is more about limiting the damage. The former is about healing relationships and restoring well-being. There are other examples where technical language distances people from what it is you want them to get involved in.

9. Growing a culture of trees and forests as well as trees

What we have found working with our volunteers in King George V Reserve, who we now call the "Community of the Tiny Forest", is that relationships grow and enthusiasm about what we are doing through celebrations. So, last winter our Te Tiriti partner helped us organize a Matariki celebration. We are planning a seed-gathering workshop that will also incorporate celebrating the fruitful and life-giving aspect of the trees.

So, as well as planting trees, pulling weeds, watering, advocating for the forest, trapping predators (in the planning stage), it is also important to acknowledge the seasons and the cycles of the trees, insects and bird life in the forest.

Celebration is a necessary part of culture and if the city is going to embrace, "own" and expand our tree and forest canopy we need to grow a tree/forest culture. To do this, we believe the plan needs to incorporate something like an annual city-in-a-forest festival. Maybe it could be focused on a different tree each year. Together we could, through all kinds of different events, not only celebrate that tree but also learn more about it and how we can be better guardians of it. The festival could also celebrate all the community volunteers and organisers who are together making such a massive contribution to growing our urban forest. This kind of celebration would build momentum, enthusiasm and our identity as a forest city.
General comments

- 1) I am <u>impressed</u> with the concept and detail of the Urban Forest Plan. It is one step in mitigating some of the effects of current and proposed intensification, and it acknowledges the impact of the built environment on climate change (e.g., the effect that loss of even small pockets of open space has on the ability to absorb rain and prevent flooding).
- 2) I <u>appreciate</u> the clarity of the consultation document, including the obvious / logical relationship between the Goals, Targets and Actions.
- 3) I <u>agree with</u> the four Principles and the four Goals.
- 4) The City Council should, in addition, <u>integrate the concepts of a "sponge city"</u> into the Plan, with an Action "to calculate Christchurch's 'sponginess' percentage rating and determine appropriate steps to increase that percentage within a specified timeframe".
- 5) Although I <u>support</u> many of the Actions, some are not ambitious enough or the time period for implementation is too long, e.g., targets related to trees on streets and commercial/industrial sites.
- 6) Because of the intensification rules brought in after the earthquakes (i.e., one dwelling for every 200m² in the Central City), there is now very little space for larger trees on many sites. So I believe the following three actions should be a priority: (i) more trees planted on streets (ii) more specific incentives for developers to keep as many existing trees as possible, with corresponding disincentives for removing them and (iii) corresponding incentives and disincentives for removing trees on commercial/industrial sites, especially near residential zones.
- 7) <u>I agree</u> that it is much easier and quicker to <u>maintain</u> current trees than it is to plant new ones and wait for them to grow.
- 8) I <u>agree</u> that the coverage of the Urban Forest should be as equitable as possible across the city. Too often, lower decile neighbourhoods are bare, with few trees to soften their environment. Many of these residents are either renting or cannot afford to landscape the site they own.
- 9) I <u>urge</u> the City Council to ensure all actions, incentives and regulations are specific and significant enough to make a real difference, e.g., the proposed Financial Contribution must be high enough and inflation-proofed, so it acts as a real deterrent to clearing an entire site and/or removing any mature trees that could be incorporated into the design or worked around. The recent example of a large grove of mature trees removed by a subdivision developer in Ilam should not be allowed ever again.
- 10) I urge the City Council to treat trees like any other valuable and vulnerable asset. This means thinking of anything and everything that could encourage more trees, both by maintaining the ones we have and by planting more. Such ideas are (i) a rate rebate of, say, \$50/year (adjusted upwards at every property revaluation) for every tree over a specified height located on private or commercial land (ii) increase rates paid in "leafy suburbs" in order to subsidise tree planting and maintenance in other neighbourhoods and (iv) put as many trees as possible on the Protected Tree list, so everyone starts thinking of trees as precious commodities.
- 11) Several outcomes of intensification in our neighbourhood (Victoria/Central City/VNA) have been identified which work against the Urban Forest Plan. They are particularly related to multi-unit developments: (i) existing trees removed to maximise the number of very small units on the sites, even when at least one tree could have been saved (ii) good topsoil removed, presumably sold for profit (iii) artificial grass used on what little outside space is left, making it impossible for owners/renters to plant anything (iv) the (few) small shrubs or trees that are planted are not maintained by short term renters, property managers or Airbnb visitors and (v) paths are made of concrete, rather than the available permeable material that can assist with rain absorption.

More specific comments on the Goals and Objectives

1) Goal 1 Plant: <u>Agree</u>, with particular interest in 1.1 (grow and maintain canopy cover), 1.2 (equitable planting across the city) and 1.3 (trees on the streets/roadways).

<u>Disagree</u> with the targets for (i) Street planting—9% by 2030 and 15% by 2070. These targets are not nearly ambitious enough, for reasons given below and (ii) Commercial/Industry—at 5% and 10% respectively it's almost not worth doing. Both need to be much more ambitious and strengthened from "encourage" to "require". Given the current and planned intensification, there is less and less space for mature trees on most residential sections in the Central City. Other neighbourhoods will soon be affected as well, so planting on streets and on commercial sites becomes even more important.

- 2) Goal 2 Nurture: <u>I agree</u> with this Goal and Objectives.
- Goal 3: Protect: <u>I strongly agree with this Goal.</u> Additional comments on each objective: <u>Comments on 3.1 (Retain our existing canopy cover):</u>
 - Our neighbourhood (Central City/Victoria/VNA) has undergone significant re-building since the earthquakes. There are many examples of developers clearing entire sites, even when it was possible to save at least some mature trees.
 - I <u>AGREE</u> with the statement that ..."*unlike most assets, a mature tree is not able to be replaced like for like".* However, current regulations are not strong enough to ensure that <u>any</u> mature trees on private property are saved.
 - It is possible to save trees and incorporate them into the overall design, as demonstrated by the rebuild at 27 Gracefield Avenue. On the other hand, in January 2021 Williams Corporation removed <u>all the trees</u> on the corner of Colombo and Salisbury Streets, despite the VNA contacting them about saving at least the tree closest to SoHo Apartments to signal the start of the City Central Residential Zone extending from Salisbury Street to Bealey Avenue. They refused, saying *"there is no requirement to maintain any trees at this location"*. Please note that when their consent was first granted, the development was a <u>commercial</u> one. At some point soon after, it changed to <u>residential</u>, which we understand means there should have been a greater percentage of land used for planting.
 - <u>Disincentives</u> to removing trees are also needed—incentives are insufficient for the shift in thinking that is needed. The recent example of a "mature forest of trees" (Press article, 25/2/23) being removed—legally—from a Clyde Road residential property should never again be allowed, given all we know about the importance of trees. The Urban Forest Plan needs to be strengthened in every possible way to address this.

Comments on 3.2 (Consider trees as critical infrastructure):

- This cannot be disputed. Every mature tree lost reduces not only protection from water run-off and flooding, but also all the other benefits. It is short-sighted to ignore the importance of trees by pandering to developers and others who (usually for their own financial benefit) do not factor effects on climate change and amenity into their bottom line.
- Trees should be treated as a valuable, vulnerable and unique resource, supported by strong, unequivocable legislation and regulation.

Comments on 3.3 (Care for and maintain trees to extend their life):

- I emphatically agree that we should maintain as many healthy trees as we can, rather than let them deteriorate or be removed unnecessarily. It takes much longer and is more expensive to plant new trees in their place.
- An example from our neighbourhood: There is one tree-lined street (Gracefield Avenue). In 2010, the City Council put a plan to residents about removing what staff identified as trees 'beyond their use-by date" and replanting with a different species. The work was ready to commence when it was interrupted by the earthquakes. Residents have reminded Council in

2019 and every year since, but there has been no action yet. Several trees have split or died in the meantime and have been removed. None replanted.

- We are concerned about how many other places this could also be happening. Maintenance and replanting when needed are essential provisions in the Plan.
- 4) Goal 4 Involve: <u>I agree</u>. Partnerships have proven to be effective, including in our neighbourhood. The VNA, of which I am a member, initiated the creation of a pocket park on Durham Street (Aldred Reserve) and is still actively involved in its use and maintenance. We believe there are additional ways to involve residents (covered under Actions, below).

Action Plan comments

1) Actions for Goal 1 Plant

- 1.1 <u>I support</u> the actions listed, in particular I <u>strongly support</u>:
 - *"Significantly increase tree planning on Council land to meet our annual planting requirements"*: Very important and a good place to start, given it does not require encouraging/requiring someone else to do something.

<u>Suggest</u> looking at the Otautahi Community Housing complex on Conference – Salisbury Streets (Airedale Courts), which includes vacant sites on the Salisbury St frontage and open space between there and Conference Street. <u>Perhaps fruit trees which residents could enjoy?</u>

- *"Ensure the Urban Forest Plan's canopy cover targets are considered in all Council projects and planning documents".* Agree, provided "*are considered"* is translated into action
- *"Replace trees that are removed with a <u>minimum of two trees</u>...." Excellent idea, but there needs to be sufficient space for at least two reasonably-sized trees, otherwise the roots won't have space to grow and the trees will be stunted and unhealthy—current and likely intensification requirements are going to work against this.*
- "Investigate ways Council can incentivise and support private land owners to retain and plant more trees". This needs to go further than 'investigate' to give more teeth to the Action re new developments (see comments re Financial Contributions below). Also needs to explicitly state this covers <u>commercial/industrial sites</u> as well (assuming it does) and to include <u>effective disincentives</u> to removing trees as well.
- *"Establish requirements for new development sites to have a minimum of 20% projected canopy cover onsite or pay a Financial Contribution (FC) to Council for planting to occur elsewhere".* There is an urgent need for this Action to be strengthened.

I therefore <u>suggest</u> that (i) there is a high threshold <u>before a developer is exempted from</u> meeting the 20% cover (ii) all Actions are supported by regulations and incentives that <u>ensure mature trees are kept</u> if at all possible (iii) the <u>FC is significant enough to act as a</u> <u>deterrent</u> to clearing the site (iv) the FC is <u>relative to the site</u> in size, valuation or other criteria, i.e, develop a formula that takes into account what is being built and the likely profit from that build (v) the <u>FC is inflation-indexed</u> and (vi) if an exemption is obtained through the FC, the <u>substitute trees are planted as close to the original site</u> as possible.

Other issues that will need to be addressed by appropriate Actions are: (i) For multi-unit developments designed either for Airbnb or very short leases, renters seldom are in a position to look after any planting, let alone new trees that need to be watered (ii) the use of Artificial grass as false garden (iii) Developers removing good topsoil, presumably to sell for profit and rarely enriching the poor soil that is left to give replacement plantings the best start possible.

• I <u>note</u> that there is no action that explicitly includes <u>commercial/industrial sites</u> except for the one to 'investigate' how to increase trees on 'private land'. It is unclear whether 'the

20% canopy and Financial Contribution' action includes commercial sites, which I assume it does. <u>I suggest</u> adding Actions specifically aimed at commercial developments.

- 1.2 <u>I support this</u>, but question whether "Target new planting projects in areas with low canopy cover" (2024-2026) actually means <u>doing</u> something or just identifying possible future projects.
- 1.3 Such planting projects must start as soon as possible.
- 1.4 This needs to be strengthened and made more specific.
 - <u>Planting on streets</u> could make the most difference of any Action, especially as intensification results in a greater number of very small residential units. The Actions currently proposed are not sufficiently action-oriented for such an important Objective.
 - Both Actions refer to <u>developing</u> a plan, not taking concrete actions, with appropriate targets for making a real difference.
 - <u>Businesses must also be required to be more active when it comes to landscaping—not just</u> a few small plants that are soon scraggly, weed-ridden, vandalised or removed.
 - If CCC is still requiring or encouraging commercial developments in the Central City to <u>build</u> <u>right up to the footpath</u> and cover most of the site, this has to stop. We note that the amended PC14 includes a Policy in High Density Residential zones that "locates building bulk towards the frontage of sites, enhancing the street wall". This will leave no space for <u>trees</u> to enhance residential amenity, given that much of the Central City has little space for trees on streets.

2) Actions for Goal 2 Nurture

<u>I agree</u> with the Actions for each of the Objectives. The quality and type of trees planted are important considerations. An example of choosing an inappropriate species are the trees in planters on Victoria Street. They are too fragile for such a busy street and, being deciduous, they end up providing none of the visual benefits of trees in winter. However, using planters is a clever way of adding trees on streets where buildings come right up to the footpath.

3) Actions for Goal 3 Protect

3.1 <u>I strongly support</u> both Actions. In addition:

- The regulatory tools to protect existing trees on private land need to be as strong as possible so owners find it easier to comply than seek an exemption.
- Retention of mature trees needs to be the "default position", not something owners / developers can opt out of through FCs or other ways. There are too many examples of both private and commercial developers removing <u>all</u> trees, just to make it easier to move equipment around and/or to squeeze in a few more units or square metres to the build. If they <u>had</u> to retain trees, they would find a way to do it.

3.2 <u>I strongly support</u>, provided the Design Standard has teeth.

3.3 <u>I strongly support</u> the importance of a tree maintenance programme, including replacement of trees when needed (see example from our neighbourhood, above). A regular tree maintenance programme is essential; the cost of new plantings, and maintenance and replacement of trees must be included in the Annual Plan.

4) Actions for Goal 4 Involve

4.1 <u>I am unsure</u> that the proposed actions will have much impact. I would rather have <u>all actions</u> directed at planting and maintaining trees as a top priority.

4.2 <u>I support partnerships</u>. In addition, I <u>suggest considering</u> (i) rate rebate for trees over certain height and (ii) higher rates in 'leafy suburbs" to subsidise planting in other areas. *See General Comments for details*

Submission on Our Urban Forest Plan from Beckenham Neighbourhood Association Inc 6 March, 2023

1. Summary

- The Beckenham Neighbourhood Association supports the aims and general intent of the plan. Trees are important for making the urban environment more liveable (especially through lowering urban heat island effects), and for improving biodiversity.
- However, the plan is very general and proposed actions are mainly investigating and thinking, rather than doing. Stronger actions would make the plan much more useful.
- We agree that protecting existing trees is much faster than planting new ones, which take time to grow. However there are currently very few protections for existing trees on private land, and housing intensification seems certain to reduce tree cover on private land over at least the next decade. There are no specific new proposals in this document which would increase retention of mature trees on private land during intensification, and introducing any would probably be counter to Central Government's aims of increading urban density and housing affordability.
- That makes planting on public land, particularly parks, riverbanks, roadsides, and cemeteries, central to achieving these goals. We consider that roadside trees have the greatest scope to offset the loss of trees on private land, and can have other benefits including traffic calming. Such trees on public land can provide biodiversity benefits whether they are native trees or exotic ones, if well chosen. However, the benefits are limited if the species selected are small at maturity, as is currently often the case.

2. Background

The Beckenham Neighbourhood Association Inc (BNA) was incorporated in 1982 and works for the interests of residents in the area bounded by Colombo St, Waimea Tce, Eastern Tce, Tennyson St, Southampton St and Southey St. We currently have about 114 financial members. The BNA area is notable for having wide streets, often with grass verges (with or without trees), and a long section of riverbank of the Opawaho/Heathcote River. In the map on page 8 of the Urban Forest Plan, the BNA area is shown to have half with high tree cover (south of Tennyson St), and the rest with low tree cover (north of Tennyson St).

3. Importance of trees

We agree with the listed values of trees in urban areas (pages 5 and 7), in particular for reducing overheating in summer, and for biodiversity. The urban heat island effect (pages 14-15) is very important, as brought home by the very hot weather in Christchurch over Waitangi weekend of 2023. Open areas of roadway and park were uncomfortably hotter than equivalent areas shaded by trees. Given that Canterbury already has some of the hottest maximum summer temperatures in New Zealand, which will get worse under climate change, action now to increase the tree cover will have clear benefits for human comfort and health in the forseeable future.

Trees are also important for wildlife, and they do not have to be native tree species to benefit native wildlife. Some exotic trees are important sources of food and nectar for birds, and all trees provide vertical habitat for birds (providing nest sites, foraging sites for insects, etc). In some situations deciduous trees (which are almost all exotic) provide benefits to wildlife and to shading in summer, while reducing negative effects of shading in winter.

We also agree that trees can help to absorb rainfall and reduce stormwater runoff, and this is important city-wide for reducing flooding risk in areas along rivers, including Beckenham.

Finally, trees with edible fruits can be a valuable addition to the urban forest (e.g. nut and fruit trees). This can get children outside learning where food comes from, and support families during times of high food inflation. The Council already has a register of food-producing trees on public land, but we understand that planting new fruit trees is not encouraged because the fruit might be messy in autumn (Plan p 17). We suggest that edible trees be given higher priority especially in or near parks.

4. Goal 1, Plant

We agree that getting more street trees has the biggest scope for increasing tree cover, because there are so many roadways, and most roadways do not have trees. We also note this has the greatest potential to reduce summer heatwave impacts directly, because streets are close to residents' houses. The Plan says (p 17) that planting in roads is challenging, but we believe these challenges are manageable. In the Beckenham area, the roads are mostly wide, and often with grass verges which sometimes have small, or no, street trees. For example, in the Beckenham Loop, Fisher Ave has grass verges and large street trees (London plane trees). Martin Ave has grass verges and a species of small street tree (less than the 3.5 m height definition of an urban tree in the Plan). Birdwood Ave has the same road width as Fisher and Martin, but has tarmac from edge to edge and has no grass or street trees. Similar wide roads with or without grass verges, but with no street trees, are common throughout Somerfield and Spreydon (for example Selwyn St has no trees or grass, while Studholme St has both).

This means there is plenty of potential for adding trees, or replacing small street tree species with larger ones. These can be chosen and placed in ways which shade the roadway (reducing heat island effects) but avoid creating too much shade on adjacent properties. For example, on streets which run east-west, larger trees can be planted on the north side verge, rather than the south side. Similarly, exotic deciduous trees can provide a good balance between shade in the heat of summer, while letting maximum sunlight through in winter. There are some native deciduous tree species, but all are relatively small at maturity.

On streets that have enough width, but not grass verges (often because previous grass verges have been sealed over), we consider that excavating pockets on the road space at intervals (perhaps near intersections) would allow medium/large trees to be planted and provide multiple benefits: for shade, biodiversity, and also to help with traffic calming by visually narrowing the wider streets, and increase rainfall infiltration which reduces flood risk. The BNA attempted to start such a planting programme on Birdwood Ave in 2020, but it could not be completed before the Waka Kotahi funding through Innovating Streets expired.

Another important type of public land which is currently low in tree cover, but has potential for more, is cemeteries. For example, Sydenham cemetery is a large open space with almost no trees (probably <5% cover). Some cemeteries have a higher tree canopy cover (e.g. we estimate that Addington Cemetery is about 15%, Barbadoes Cemetery 20%, and St Cuthbert's church cemetery in Governors Bay more than 50% canopy cover) and are still very nice places to visit. We think carefully placed large trees (perhaps deciduous) could be put across most cemeteries in Christchurch, with benefits for urban forest and wildlife, and no negative impact on visitors to the cemeteries. There might be some increase in grounds maintenance cost.

5. Goal 2, Nurture

We agree that more native trees will help support native wildlife. However, we note that the two most common native trees currently found in the city are cabbage trees (4th most common) and ribbonwood (5th) These two are both relatively small trees which have small canopies and cast little shade. The other native trees in the current top 10 are kowhai (8th), which can grow to medium

size, and totara (10th) which grows into a very large tree so is mainly suitable for parks rather than streets. Of these natives, kowhai is valuable to native wildlife for its flowers, and cabbage tree and totara are valuable for their fruit.

There are a number of exotic trees which are a suitable size for street trees, and also provide biodiversity benefits. For example Banksia integrifolia is an Australian tree which is tall but not excessively wide-spreading, and has large flowers in winter which are greatly favoured by bellbirds.

We argue that a mix of natives and exotics is likely to give the best outcomes, but that trees need to be reasonably large at maturity to contribute much to the benefits from trees. From some consultation pre-quake about Council-recommended species to use as street trees, it seemed that most of the recommended species were chosen partly for not getting too big, in case they got in the way. If we really are to reduce the heat island effect and benefit biodiversity, that priority may have to change, as implied on page 6 where it says one goal is to have "urban trees valued .. as critical infrastructure". The goal should be to plant larger species anywhere that local features do not rule that out, instead of using small species as the default.

6. Goal 3, Protect

Redevelopment on private land is where the current (and likely near-future) loss of tree cover is worst. But this Plan is basically helpless in face of intensification leading to the loss of mature trees when properties are redeveloped. The "Actions" listed on page 27 seem likely to be wholly ineffective. The current rules are nearly entirely unable to protect trees on private property. It would be great if more effective rules could protect existing mature trees, but this seems unlikely. Any such moves would also have some negative effect on the design of new buildings, and also on the price of newly built apartments, so would be likely to be opposed by central government, and by property developers. So we don't believe that any effective action here is at all likely.

Hence, if this Plan is going to achieve anything, it has to be by rapid and effective action on public land.

7. Verbal submissions

We request the chance to speak to our submission if there is a hearing.

Dave Kelly chairman, BNA dave.kelly@canterbury.ac.nz

AVONHEAD COMMUNITY GROUP INC.

SUBMISSION

Under

Ōtautahi Christchurch Urban Forest Plan

Christchurch City Council

Thank you for the opportunity to submit on this consultation. On behalf of the Avonhead Community Group Inc, we have the following submissions:

1. Maintenance: the maintenance programme should have a mechanism for residents / ratepayers to notify the Council of issues with maintaining existing tree canopies or urban forests, which then results in the Council assessing the issue and addressing it as appropriate. We are advocating to involve the local recognised residents group/ community organisations and hand over the responsibilities for the maintenance and upkeep the plantation on a specified area which is manageable by the organisation and provide them annual resources for the purpose. That will reduce the burden of expenditure on the Council and the locals in their own interest will look after the designated area in their own interest. It should be purely by voluntary participation and nodal officer in the Council shall oversee and coordinate the action plan. To start with a few model /pilot project must be initiated immediately that could be emulated in the rest of the Christchurch in due course. A detailed plan of action should be developed in consultation with the major community groups as a long term participatory management of urban tree cover in Christchurch.

2. Consultation: Where new plantations are contemplated, local residents / ratepayers should have an opportunity to provide feedback on the type of vegetation proposed. For instance, residents may be concerned that mature vegetation of the proposed kind could block sunlight in future or be more likely to trigger alerting responses. Further, many trees are having adverse impact on the local residents in terms of allergic response and respiratory issues. Concerns such as these should be taken into account before the decision on plantation is finalised. In fact, consultation should be made in every suburb involving the local residents and the responsibilities should be given to the recognised groups to collect and collate their opinion before any selection of species for plantation is made. We emphasize once again that the meaningful dialogue with the locals must be encouraged instead of observing a process as a mere formalities to complete the paperwork.

Submitted. If need be ACG is ready to present it before the Panel/Committee.



Submission on publicly notified proposed Ōtautahi Christchurch Urban Forest Plan

To:

Christchurch City Council PO Box 73016 Christchurch 8154

engagement@ccc.govt.nz

Name of submitter: Spark New Zealand Trading Limited Private Bag 92028 Auckland 1010

This is a submission on the proposed Ōtautahi Christchurch Urban Forest Plan.

Spark New Zealand Trading Limited (Spark) could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that the submission relates to, the submission points, reasons and decisions sought are detailed in the attached submission.

Spark wishes to be heard in support of this submission if there is an opportunity.

Signed:

On behalf of Spark New Zealand Trading Limited **Dated** at Auckland this 6th day of March 2023.

Address for Service:

Attention:Graeme McCarrison
Planning and Engagement ManagerTelephone:0274 811 816E-mail:graeme.mccarrison@spark.co.nz

Introduction

The New Zealand mobile market is growing, with consumers using significantly more data than previous years whilst also demanding greater speeds. In 2019, New Zealand mobile data average usage increased 35% compared to 2018¹. Success in wireless-based products and services is underpinned by investment in the mobile network.

Telecommunications providers provide critical communications infrastructure that connects communities, promoting inclusivity, supports economic and environmental objectives, and is a critical part of our response to climate change. Telecommunications infrastructure is further highly dynamic and - unlike other infrastructure sectors - our network requirements are changing and evolving constantly and at a fast pace. Telecommunications infrastructure providers invest over \$1.5 billion every year² to maintain existing communications services, add capacity and resiliency to existing networks and connect new communities. For example, the increasing densification of the urban environment means we expect to replace over 40 towers every year to maintain existing services.

In parallel, providers are currently rolling out new 5G mobile networks, deploying over 1,000 new mobile sites and extending network coverage to regional communities. The continuous technology upgrades are needed to keep up with the increasing demand from consumers and businesses – exponential growth in the use of data is continuing and each year the amount of data handled by telecommunications networks roughly doubles³.

Looking forward, we are well placed to deploy new technologies, support the new Public Safety Network solution, and provide solutions to many of today's challenges, from climate change to lifting our productivity and innovation. New Zealand is ranked third in the world by the GSMA (Global System for Mobile Communications) in terms of our readiness to deploy and adopt new mobile technologies⁴ and our sector is poised for widespread deployment of these new technologies.

To sustain current and meet future infrastructure requirements we need an efficient and flexible planning system and related strategies and codes need to recognise and accommodate the network needs of our critical infrastructure. It is essential that the proposed Urban Forest Plan effectively and efficiently balances competing demands and provides the certainty necessary for building long-life critical infrastructure alongside developing the urban forest.

¹ Commerce Commission Annual Telecommunications Monitoring Report 2019

² The New Zealand Commerce Commission, <u>Annual Telecommunications Monitoring Report – 2021 Key Facts</u>, 17 March 2022 [at p25].

³ The New Zealand Commerce Commission, <u>Annual Telecommunications Monitoring Report – 2021 Key Facts</u>, 17 March 2022

⁴ <u>https://www.mobileconnectivityindex.com/#year=2018&globalRankings=overall&globalRankingsYear=2019</u>

The increasing regular natural hazard events, such cyclone Gabrielle and COVID-19 continue to be a reminder that as a 'lifeline utility' telecommunications play an important role in keeping people connected. For customers, almost every interaction with the outside world during lockdown was enabled by a phone or internet connection. COVID-19 was the biggest test of mobile infrastructure as Kiwis moved to work, learn and be entertained at home. The divide between having an internet connection and not has never been as stark as during COVID-19 lockdowns. As businesses, schools and services shifted online during COVID-19 lockdown, Kiwis without an internet connection found it difficult to do anything, including banking, facilitating medical care and access to social services, compounding inequality within our community. Telecommunications infrastructure enables people to stay connected and allows for disaster resilience by providing a comprehensive and robust telecommunications network.

The deployment of internet of things (IoT) technology, using smart devices and remote probes which communicate in real time over telecommunication networks for a range of applications including wellbeing, climate change, safety, road management and environmental monitoring.

The intensification of urban areas is adding new challenges to ensuring our coverage footprints are maintained and capacity expended to ensure customers expectations of access to digital services are met.

Telecommunications Regulations

The location of telecommunications networks is enabled via the following regulatory regimes.

Resource Management (National Environmental Standards for Telecommunications Facilities) Regulations 2016

Our networks are provided for and enabled under the package of regulatory regimes including: The *Resource Management (National Environmental Standards for Telecommunications Facilities) Regulations 2016* (NESTF) came into force on 1 January 2017. The NESTF purpose and scope is to enable network operators as determined under the Telecommunications Act to ensure telecommunication networks can be constructed and continually upgraded with new technology.

The limitations of the NESTF are that the range of permitted activities as described above do not extend to include new wireless radiocommunication facilities (other than small cell units) outside the road reserve in urban areas means that mobile network providers rely on the rules for network utilities in the operative Christchurch District Plan.

Utilities Access Act 2010

The Act has the purpose to require utility operators and corridor managers to comply with a National Code of Practice for Utility Operators Access to Transport Corridors that regulates

access to transport corridors. The code provides a nationally consistent and cooperative framework for corridor managers and utility operators, to manage transport corridors while also providing for the access rights of utility operators.

Christchurch Infrastructure Design Standards

The purpose of the Infrastructure Design Standard is to provide the design standard for both Council funded assets and assets that will be vested with Council, through processes such as subdivision. These standards do not regulate the planting of trees near existing infrastructure including in the street.

Urban Forest Plan

We appreciate the long history and value that trees have as essential part of the character, essence, and identity of Ōtautahi Christchurch. The Plan recognises that trees are a critical part of the city's response to climate change and urban intensification.

The benefit of trees including the transport corridors include:

- Trees and planting within streets to bring human health and liveability benefits to everyday lives of people who use neighbourhoods.
- Street trees and planting within street networks to reinforce legibility, wayfinding and identity through neighbourhoods.
- Street trees provide shade and protect people from harmful ultraviolet radiation, in turn reducing the risk of heat stroke, sunburn and melanoma.
- Trees visually enhances a street, can be character-defining and nurture a sense of pride in the area.
- Trees providing shade and shelter, climate resilience, improved air quality and amenity.

We that the Plan recognises that the potential for damage of nearby and underground infrastructure. Applying a rule of thumb of *"right location, right plant, right function"* can avoid many of these problems. Taking the approach of better integrated design and planning to select the right species to ensure the proposed tree is appropriate for the space it is intended to be planted is critical. It is noted the Plan priorities large trees. Large trees have a greater potential for impact on network utility infrastructure, such telecommunications.

Treating urban forest requirements on an equal par with other infrastructure when planning, designing and developing the Ōtautahi Christchurch is a reasonable objective. The Plan fails to discuss or recognise the range of infrastructure including telecommunications that is critical and essential to Ōtautahi Christchurch. However, we note and support the action to update

the Ōtautahi Christchurch Infrastructure Design Standards and the better co-ordination of below and above ground infrastructure works⁵

	Funding	Implementation timeframe			
Action		2023- 2024	2024- 2026	2027- 2029	2030- 2032
Develop a comprehensive tree planting guide which will include a list of design and engineering solutions to incorporate trees into the built environment.	Funding required	\checkmark	\checkmark		
Update the Council's Infrastructure Design Standards to include guidance on soil volume and planting practice to ensure trees have the soil volume they require to reach maturity; and include planting practices that reduce the risk of damage to infrastructure from tree roots.	Currently funded	\checkmark	√		

What Plan fails to recognise and have actions:

- 1. The plan fails to explore the potential impact on private infrastructure such as electricity and telecommunication networks.
- 2. When there are conflicting priorities i.e. planting trees verse network utility infrastructure how will this different interests and priorities be considered.
- The development of tree species guideline for what species are appropriate over, near and adjoining network utility infrastructure such as a telecommunications facility. Maybe the first action under objective 2.5 on page 16 is includes planting guide and design and engineering solutions for trees planted over, near and adjoining infrastructure.
- 4. Funding for pruning and maintenance of trees or structures installed to protect infrastructure.
- 5. Process of consultation with network utilities potentially impacted by proposed tree planting.

Will the Council be exploring a review of the Christchurch District Plan trees rules especially related to ensuring that trees near infrastructure are maintained?

Telecommunications alongside other critical infrastructure is part of Ōtautahi Christchurch climate resilience, having well-functioning rural and urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

Telecommunications Infrastructure

Telecommunication services the majority of people and businesses is provided via fixed line and wireless services. Fixed line being fibre and copper cable generally underground and

⁵ <u>https://ccc.govt.nz/assets/Documents/Consultation/2023/02-February/CUS5882-Urban-Forest-Plan-A4-WEB.pdf</u> pages 13 and 26

occasionally attached poles. Wireless is generally via antennas attached to poles or on buildings. Both fixed line and wireless networks are potentially impacted by trees including:

- Tree roots damaging underground cables.
- Tree branches damaging cables running through the trees.
- Trees blocking or reducing connectivity between the antenna and the customers device. Consequently, trees impact on the coverage footprint and capacity of the cell-site.

Urban forests have an important role, as does telecommunications and other critical infrastructure, to support the wellbeing of people, visual amenity, and climate change mitigation as we try to create urban areas to be partial 'sponges' for heat and storm events. However, trees can also absorb signals from antennas, significantly adversely affecting the ability for the infrastructure to perform its function. This can be overcome by having antennas elevated above the tops of trees. The following photo and diagram highlight the benefits of high cell sites that look over the trees to reduce the impact of vegetation blocking radio waves. However, as the trees get taller and wider there will be impacts on the coverage and capacity of the cell-site to maintain the existing level of service unless the trees are trimmed.



Road Reserve Adjoining 180 Innes Road, St Albans, Christchurch



A key consideration for the tree species selection and positioning is recognising where existing infrastructure is located, as moving it is often extremely expensive and if there is no or limited alternative locations. For urban areas – telecommunication reticulation should be implicit in development plans. Engagement with telecommunication operators at the early planning stages of development and proposed tree planting is essential to ensure future generations of property owners can obtain the telecommunication services they reasonably expect.

Requested Relief

Spark seeks the following relief:

- 1. The Plan Ōtautahi Christchurch Urban Forest Plan includes:
 - a. Greater recognition of the impact on the private infrastructure providers such as the wireless/mobile networks.
 - b. Funding for pruning and maintenance of trees or structures installed to protect infrastructure.

- c. Process of consultation with network utilities potentially impacted by proposed Council tree planting especially in the streets/transport corridors.
- d. When there are conflicting priorities i.e. planting trees verse network utility infrastructure how will this different interests and priorities be considered.
- e. The development of tree species guideline for what species are appropriate over, near and adjoining network utility infrastructure such as a telecommunications facility. Maybe the first action under objective 2.5 on page 16 is includes planting guide and design and engineering solutions for trees planted over, near and adjoining infrastructure.
- 2. That the council collaboratively works with network operators including Spark on the how the Urban Tree Plan and Infrastructure Design Standards will enable trees to coexist with other critical infrastructure such telecommunication networks without impacting.
- 3. That Council develop a communication and approval process that enables network utility operators to work with Council and developers on proposed tree planting and trimming/maintenance programs.
- 4. Spark seeks to be heard on this submission.



Our Hills, Our Heritage

The Summit Road Society is a grassroots conservation charity based in Christchurch. The Society was formed in 1948 to further the vision of Harry Ell to preserve and protect the Port Hills and provide for public access. We own and manage four reserves on the Port Hills and also lead the backyard and community project 'Predator Free Port Hills'. We have a long and close relationship with the Christchurch City Council in particular the Port Hills Ranger Service. Thank you for the opportunity to provide feedback on the Draft Urban Forest Plan.

The many benefits of restoration

We support the plan's overall direction and particularly support the focus on protecting and growing native forests. However, we would like to see the overall canopy goal extended from 20% to 25% by 2070.

The Society's long term vision includes restoring native vegetation to the gullies of the Port Hills including wetlands, shrublands and broadleaf-podocarp forest. We are facing dual crises of climate change and biodiversity loss. Reforestation of the gullies will create ecological corridors, provide habitat for native fauna, reduce erosion and sedimentation, improve freshwater values, enhance community wellbeing, improve resilience to extreme weather events, sequester carbon and restore mahinga kai values. This will require a collaborative approach, with the Christchurch City Council, community organisations and private landowners working together.

We need to set up the appropriate conditions for nature to take over. In areas of regenerating and remnant bush, this includes fencing, weed, pest and predator control, and enrichment planting. The biggest threats to the health of the forest are invasive weeds and feral browsers, such as pigs, deer, hares, rabbits and possums. In valleys that are devoid of vegetation, the focus is on landscape-scale planting. There is insufficient seed source for these areas to naturally regenerate in the coming decades.

In urban areas, we would like to see mini forests, green corridors and backyard biodiversity encouraged and incentivised. We are in support of the Financial Contribution process for developers to ensure a minimum tree canopy cover and would like this extended to 25%. If there is insufficient space on private properties for 25% canopy cover then this money can be used to plant trees (preferably native but also exotic where appropriate) in nearby parks and reserves.

We are also in favour of initiatives that foster kaitiakitanga of our natural environment, such as supporting groups to undertake native planting, weeding and predator control in their local urban reserves.

The Urban Forest Plan is a very good start. However, plans alone cannot achieve the stepchange needed; initiatives need to be properly resourced. The sooner we start to practically address these crises, the more likely we are to be successful and the cheaper it will be in the long run.



CCC Parks and Reserves

We commend the efforts of the park rangers to protect and restore biodiversity. For example, the ranger team has planted hundreds of thousands of trees on the Port Hills. The Council needs to resource this team to continue and expand their efforts.

Support for Te Kākahu Kahukura

We would draw the Council's attention to Te Kākahu Kahukura, a landscape-scale restoration project on the Southern Port Hills. The vision for Te Kākahu Kahukura is that by 2050 the Southern Port Hills has a thriving and resilient indigenous forest supporting an abundance of native birds and invertebrates; it is a taonga for the Ōtautahi / Greater Christchurch community to value, protect and engage with. It is an exciting and aspirational initiative that has the ability to deliver landscape-scale restoration on the doorstep to Christchurch city.

Pest/weed trees

While we are generally in support of the plan and of retaining existing trees, there may be valid reasons for removing selected trees for safety or ecological reasons. For example, some exotic tree species are considered weed species in high biodiversity areas of the Port Hills. An exotic tree on a residential property may be a significant seed source and on balance, the environmental risks may outweigh the environmental benefits a particular tree brings. Such trees include wilding conifers (e.g. *Pinus radiata*, Douglas Fir), sycamore, holly, rowan, tree lucerne, wild cotoneaster, hawthorn, boxthorn, spindle berry, elderberry etc; see Meurk et al., 2019)^a. We would like to ensure that there is a pathway to allow for removal of pest/weed trees in these situations.

If hearings are held, we would like the opportunity to speak to our submission.

References

^aMeurk et al. (2019) What do we do with the weeds of Canterbury? Emerging biosecurity risks for Canterbury's natural biota and timely responses. Canterbury Botanical Journal **50**, 38-54.

Urban Forest Plan CCC 2023

Englefield Residents Association – Submission

Dear Sir/Madam

Thank you for this opportunity to comment on the council Urban Tree Plan.

1.We agree with the plan and vision statement.

2. However we are astonished at the number of mature trees that have been allowed to be removed by developers. This needs to be stopped immediately if you are serious about the Urban Forrest Plan. What kind of quality of life are these people in these new units going to have in the future? No trees, no shade, no beauty, no bird song, no privacy. It takes many years to grow mature trees. And there is no reason why some developments can't make plans to leave trees in. We have seen many examples of this in developments around the city. Now with the new scientific information about global warming the council would be negligent if it did not specify to development both private and commercial premises need to do this.

3. The current council rules for intensification are allowing too much concrete, creating global warming and not enough green space for drainage creating flooding.

4. We would like to see that the council ensures it is adequately funded with staff and resources to ensure the existing canopy is protected and that the plan can be implemented properly. Heritage Trees should be listed for protection.

In conclusion

The citizens of this city have been talking to the council about this, especially since the earthquakes, when we had the GOLDEN OPPORTUNITY to rebuild our city and the first VISION STATEMENT from the people which was A CITY IN A GARDEN from 110,000 submissions.

But somehow this had been overlaid/overlooked by the vision of absolute GREED from developers and the council who are only motivated by profit (more rates), and we are ending up with a hot 'concrete jungle' offering no privacy or shade and prone to flooding in some parts. Trees also give privacy between neighbours. The premise that tree shade is not welcome in winter is an urban myth. Trees give some shelter from the rain and weather as evidenced by the dry spots under the trees and where people sheltered after the earthquakes in Hagley Park.

All areas of Christchurch need trees, not just the leafy green suburbs. If the CCC are serious about this Vision Statement, then removal of trees in the city needs to be stopped immediately as we know how long it takes to grow a stable mature tree and for it to do its work of nature for us. Trees need to be ordered as part of the infrastructure of any development with carbon credits counted against the pollution the new development is creating.

Trees are so important in the long term for our ongoing health, our well being and the wellbeing of the planet. Thank you for reading our submission.

Irinka Britnell, Chairperson, Englefield Residents Assoc. Ph (03)981 5878

Mahaanui Kurataiao submission on *Our Urban Forest Plan for Ōtautahi Christchurch*

- In conjunction with the Papatipu Rūnanga, this submission on the Urban Forest Plan (the Plan) has been prepared by Mahaanui Kurataiao Ltd (Mahaanui), the regional environmental entity (REE) which provides environmental and resource management services to the Rūnanga.
- Mahaanui welcomes the opportunity to provide feedback and commentary on the draft <u>Ōtautahi Christchurch Urban Forest Plan</u> (the Plan) to the Christchurch City Council. We acknowledge this is an important document, the first such Plan for Ōtautahi Christchurch. It is anticipated that the Papatipu Rūnanga can play a key part in shaping the narrative to realise the outcomes sought from this Plan.
- 3. Mahaanui has also reviewed an initial draft of the Plan on behalf of the Papatipu Rūnanga and this is acknowledged in **Appendix 2** of the Plan.
- 4. While this Plan has a focus on urban areas of the city and Banks Peninsula, our comments are primarily focused on urban Ōtautahi Christchurch.
- The built and natural design outcomes now apparent in Ōtautahi Christchurch associated with its post-earthquake regeneration reflect historical narratives and key Ngāi Tūāhuriri / Ngāi Tahu kaupapa and values.
- 6. We acknowledge the emphasis placed on the relationship between manawhenua and indigenous biodiversity is an important part of Ngāi Tahu culture and that a 'the forest is central to manawhenua values'. We anticipate that design elements and new plantings and will closely align with this narrative, kaupapa and values.
- 7. In the urban environment, it is accepted that many locations or sites have existing exotic trees (e.g., specimen trees in waterside reserves), however, we do not wish to see new exotic (tree) plantings. Our objective is to promote native trees as taonga valued for the maintenance of water quality, mahinga kai and cultural well-being.

Mahaanui Iwi Management Plan

- Mahaanui also administer the Rūnanga-authorised <u>Mahaanui Iwi Management Plan 2013</u> (IMP), an expression of kaitiakitanga and rangatiratanga. The protection and enhancement of indigenous biodiversity and mahinga kai underpins many of the issues and policies in the IMP.
- 9. The IMP is also a manawhenua planning document reflecting the collective efforts of the six Papatipu Rūnanga that represent the hapū who hold manawhenua rights over lands and waters within the takiwā which are within Ōtautahi Christchurch. The IMP has formal status under the RMA and is widely used and taken into account by territorial authorities when preparing both statutory and non-statutory documents.

- 10. Our observation is that the linkages between the Plan and the IMP as it stands are insufficient. We make a series of points (in the Appendix) for inclusion in the Plan which are entirely relevant to the IMP.
- 11. The Plan notes (pg. 4), the relationship between tāngata whenua and indigenous biodiversity is an important part of Ngāi Tahu culture and identity. The protection and enhancement of indigenous biodiversity and mahinga kai underpins many of the issues and policies in the IMP (Section 5.5 Tanē Mahuta).
- 12. Our submission focus (Appendix points) is on supporting our initial draft content submitted; and recommending or suggesting additional content for the Objectives based on the importance of the IMP to the Papatipu Rūnanga.

Summary

- 13. In general, the goals and actions of the draft Plan reflect manawhenua values, as set out in the IMP and the revised draft aligns favourably with the intent of the IMP. But the Plan 'needs more' to make it an ambitious and implementable plan. Specific points we feel need to be addressed are made in the Appendix.
- 14. Mahaanui have given much thought to the existing structure and content of this plan. We don't wish to re-write the Plan, more so provide a meaningful Papatipu Rūnanga narrative throughout which we believe will lead to a Plan which will provide better outcomes not just for manawhenua but for all communities who live in Ōtautahi Christchurch.
- 15. Mahaanui in conjunction with the Papatipu Rūnanga would welcome the opportunity to discuss input into the structure and design of this Plan. We have to date invested a not insignificant amount of time in preparing this submission and would welcome dialogue in developing a Scope of Works for ongoing and costed engagement with the Council in preparing a finalised version of the Plan.
- 16. We would like the opportunity to speak to our submission. Thank you.

APPENDIX: comments linked to Plan Goals / Objectives

General points – Action Plan

- 1. Where relevant, IMP policies and issues are referenced (in *italics*) and linked to Plan Objectives (in **bold**).
- 2. We strongly endorse the dedicated inclusion in the Plan (pg. 4) of text taken from the *IMP*, *5.5 Tanē Mahuta* (pg. 127 of the IMP). If the council wishes, Mahaanui could provide additional design elements to enhance this important text (and elsewhere in the Plan).
- 3. We support **Objective 1.4** the development of canopy cover targets for Banks Peninsula. This is clearly linked to *IMP Issue TM3 Restoration of indigenous biodiversity*. We suggest this Objective (and Actions in the Plan) be linked more specifically to *IMP Policies TM3.1* and *TM3.2*.
- 4. The Plan 'has a strong focus on built environment areas ... the urban areas of the city and Banks Peninsula' (pg. 9). We suggest inclusion of a second map identifying the distribution of canopy cover across Banks Peninsula (highlighting urban areas (e.g., Lyttelton ad Akaroa) to complement the urban Christchurch map (pg. 8). This would then make clearer the association with **Objective 1.4** and its Actions.
- 5. We confirm support for **Objective 2.4** and its alignment with *IMP Policy TM2.8* to require the integration of robust biodiversity objectives in urban and rural land use planning. This is a key objective for Papatipu Rūnanga, in particular to enhance indigenous flora and sustaining mahinga kai.
- 6. We support **Objective 4.2** about creating effective partnerships with iwi (and others). This is clearly linked to *IMP Issue TM2* (Indigenous biodiversity). We suggest this Objective (and Action) be linked more specifically to *IMP Policy TM2.1*, with an emphasis on applying and implementing of the role of mātauranga (knowledge) held by ngā Papatipu Rūnanga.

Currently we note the Plan does not cite the term '*mātauranga*'. We recommend its inclusion to emphasise the term '*traditional knowledge*' (pg. 9).

- 7. In **Objective 4.2**, we suggest that within the first Action, 'iwi' is replaced with 'Papatipu Rūnanga' as it is the individual Rūnanga (rather than Ngāi Tahu) who will provide advice specific to their takiwā on urban trees, mahinga kai and associated indigenous biodiversity.
- 8. We confirm support for **Objective 4.3**, that manawhenua priorities outlined in the IMP are incorporated in the Plan. This is a key Objective for the Papatipu Rūnanga, who wish to be closely involved in the Action to map existing (and to-be-restored) mahinga kai sites. We suggest this Objective also be tied more specifically to *IMP Policies TM1.2*, *TM1.3*, and *TM1.7* (*Remnant areas*).
- 9. We confirm support for **Objective 4.4** about making strong cultural connection between the urban forest and Ōtautahi communities. Papatipu Rūnanga would welcome the opportunity to support the associated Action for development of cultural narrative and interpretation on manawhenua associations with trees / forests.

10. We also strongly recommend section headings in the Plan adopt te Reo co-headings, in line with practice observed with other City documents, e.g., the excellently presented and format of the 2019 *Integrated Water Strategy*.

Mahinga kai and cultural harvesting

- 11. Mahinga kai, as acknowledged from the IMP (indirectly, pg. 4 of the Plan), has sustained tangata whenua for hundreds of years, providing food, fibre, building materials, fuel, medicine and other necessities.
- 12. It is important to note that mahinga kai is not restricted to food gathering practices and recommend this is made clearer in the body of the text in relation, at least as it relates to urban forests.
- 13. Reserves, parks and other open space provide numerous opportunities to enhance cultural landscape values, particularly indigenous biodiversity. Indigenous species valued as mahinga kai can be incorporated into landscape design, and appropriate protocols developed to enable future cultural harvest (or customary use).
- 14. IMP Policies IH8.1 IH8.4 are directed toward the management of open spaces within the city. Policy IH8.3(e) specifically looks at provisions for cultural harvest on public land. Policy IH8.3(c) also looks at the use of large specimen trees as part of indigenous restoration. We suggest these are tied to **Objective 4.3**.
- 15. The subdivision guidelines (within *IMP Section 5.4 Papatūānuku*, pg. 107-109) are particularly focused on future development proposals, however, there are some key directives that can be applied to the Plan. In particular, *Guidelines 7.3* and *7.4* encourage native street trees and natives to be part of new reserve planting and landscape design.
- 16. Also, *Guideline 7.5* specifically mentions native pines with an expectation of future cultural harvest along with development of designed gardens with pā harakeke (flax gardens) with intent to utilise the plants for cultural activities. These biodiversity features would naturally complement each other.

Ihutai catchment

- 17. Ihutai within the IMP (Section 6.5) refers to the wider Christchurch City catchment (*IMP Map 12*) and is not specifically Te Ihutai Moana, the Ōpāwaho-Ōtākaro estuary. We suggest this is made clearer in the up-front section of the Plan.
- 18. IMP Issue IH7 highlights the widespread loss of indigenous biodiversity in the Ihutai catchment. IMP Policies IH7.1 IH7.4 identify sites for restoration, ensuring indigenious species (including specimen trees) are given balance with existing exotic species, and the identity of Ōtautahi Christhcurch as the Garden City through enhanced indigenious biodiversity.
- 19. We suggest these policies be acknowledged and tied to **Objective 4.3**. Furthermore, *IMP Policy IH7.4* is about requiring city plans including specific policy and rules to manage (listed) existing remnant and restored natural habitat areas in the catchment.

- 20. The 'Black Map' (from 1856) illustrates the extent of indigenous vegetation and ecosystems in pre-European times in the Ihutai catchment. That map is a powerful expression of the extent of loss of original vegetation cover (see *IMP Maps 13* and *14*, pg. 240-241). Examples of traditionally significant sites within the catchment are listed in the *IMP Table 4* (pg. 242).
- 21. The Plan is silent on red zone land. We acknowledge that ownership and management of Crown-owned red zone land is being progressively transferred to the City. We consider that some red zone commentary be incorporated as there are parts of the red zone which are culturally significant, in particular Te Oranga (Horseshoe Lake Reserve) and Ōruapaeroa (Travis Wetland).

IMP Policy IH1.1(c) refers to designing the urban environment in a way that respects the wāhi taonga status of the Ōtākaro river.

Cultural heritage

- 22. Ngā tūtohu whenua (cultural landscapes) is a concept used in the IMP to recognise areas and places of particular importance. This also a matter of national importance under the Section 6 of the RMA.
- 23. In addition to the mapping of mahinga kai (Action under **Objective 4.3**) we suggest that the listed habitat areas (pg. 239) and others identified since the IMP was written are also mapped and included as part of the Plan.
- 24. *IMP Issue CL2* (Section 5.8 *Ngā Tūtohu Whenua*) also identifies a comprehensive and accurate source of information on sites of significance. *IMP Map 5* (pg. 167) shows how cultural mapping work can be used to inform planning maps and decision making.

Climate change – biodiversity and pests

- 25. Climate change is identified as a key concern in the Plan and is a significant issue for Papatipu Rūnanga (*IMP Issue R3, Section 5.2 Ranganui*). We would like to see **Objective 2.1** linked to the IMP, specifically to *Policies R3.3(b), R3.3(f)* and *R3.6*.
- 26. The *Canterbury Climate Change Risk Assessment* (from 2022) identifies that climate change is a highly rated risk for biodiversity. The assessment also notes the increasing threat of pest species and how they may out-compete native species (including juvenile urban trees) where changed habitat occurs.
- 27. Weeds and pests are an issue (*IMP TM.4*) for Papatipu Rūnanga. These are acknowledged on pg. 11 and cited under '*Issues We Need To Consider*' (the Plan, pg. 13). We suggest that some expanded commentary be made about pest and diseases in this section and that potentially an Action can be added (under **Objective 2.1**) to connect to (in particular) *Policies TM4.3* and *TM4.4*. Effects from weeds and pests on mahinga kai may be significant.
- 28. To counter the spread of invasive woody weeds and standing trees in the bed and margins of rivers (*IMP Issue WM15, Section 15.5 Wai Māori*), *Policy WM15.5* is about supporting the use of regional catchment management plans to promote the use of suitable native trees as riparian margins instead of willow.

Monitoring and review

- 29. In the Plan (pg. 21), the development of a monitoring programme (an Action) is noted. Mahaanui would be happy to discuss the incorporation of State of the Takiwā reporting and other appropriate tools within the monitoring programme.
- 30. State of the Takiwā is a monitoring tool used within the Ngāi Tahu takiwā to assess and report on the cultural health of natural resources and the environment. It utilises a cultural values-based environmental monitoring and reporting system.
- 31. *IMP Policy TM3.3* refers to the State of the Takiwā to provide assessments of current and desired states of cultural health of an area and cultural assessments of restoration requirements and risks. We suggest this policy aligns with **Objectives 1.1**, **2.1** and **2.2**.

Banks Peninsula

- 32. While the Plan focuses on the urban areas of the city / Banks Peninsula, we note there are specific issues relevant within the takiwā of ngā Papatipu Rūnanga of Banks Peninsula which can be discussed with the Council when that (rural) process gets underway in 2023/24.
- 33. To note, the name 'Horomaka' referred to on pg.9 is not 'Banks Peninsula'. The correct term for Banks Peninsula is *Te Pātaka o Rākaihautū*. *Horomaka* is the name for an island within Port Levy (Koukourārata).

The Canterbury Botanical Society committee members have compiled a list of the emerging tree weeds they consider could negatively impact on the urban Forest.

The lists is based on risks associated with location, habitat, or threatened plant ecosystem.

It is now clear that most emerging weeds come from gardens. Communicating the risk of garden plants to gardeners, landscapers and nurseries will be a challenge.

These are not exhaustive lists. Further observations and records will add new tree weeds.

Table 1: Trees likely to become widespread environmental weeds in 5-20 years time

Botanical name	Common name	Comments by William Reinders & others
Acer platanoides	Norway maple	sycamore by another name
Ailanthus altissima	Tree of heaven	Suckers
Arbutus unedo	Strawberry tree	
Cotoneaster coriaceus		
Cotoneaster franchetii		
Cotoneaster frigidus		
Cotoneaster simonsii		
Cotoneaster species		All cotoneaster species have potneial to spread
Euonymus europaeus	Spindleberry	Locally entrenched in a few North Canterbury shrublands, prolific seeder
Luma apiculata	Chilean myrtle	No problem around Chch, but will easily colonise beech forest where there is high/regular rainfall.
Maytenus boaria	Mayten	I think the hype is justified on this. Particularly interesting is the fact that it suckers. I know of a big patch of mayten that appears to be spreading synergistically with ivy; the ivy is preventing all seedling establishment but allows mayten suckers through; and the mayten gives the ivy the perch it needs. Both male and female plants now present, thus seeding.
Photinia davidiana		
Prunus laurocerasus	Cherry laurel	Naturalising in some forest remnants, shade-tolerant, can layer
Prunus lusitanica	Portugese laurel	Self-seeds readily in gardens and amenity areas, but rarely truly naturalised. Shade tolerant, can layer
Prunus serotina	Black cherry	we should be grateful that this has not been commonly planted! I've only seen it in one garden location, but its extreme reproductive success there makes me think this could be an apocalypse weed. Should be banned immediately.
Prunus serrulata	Japanese hill cherry	already naturalised in places around the city
Prunus x subhirtella		 – naturalised wherever P. serrulata is, but maybe less common; however, it is also less planted. Even the

		weeping forms are fertile, and the seedlings revert to a normal growth form.
Rhamnus alaternus	Italian evergtreen buckthorn	shade tolerant
Rhaphiolepis indica	Indian hawthorn	seeds itself abundantly in gardens and poorly maintained areas. Haven't found in wild areas yet, but near planted adults it is one of the commonest self-seeding shrubs in the industrial zone: every bird perch has carpets of seedlings beneath, and seedlings
Rhaphiolepis umbellata		pop up hundreds of metres away. My spidey sense is tingling with this one
Trachycarpus fortunei	Chinese windmill palm	
Viburnum tinus	Lauristinus	Self-seeds readily in gardens and poorly maintained amenity areas, occasionally in wild areas (eg: Oxford). Worth keeping an eye out for.

Table 2: Trees for sale with weedy characters that are likey to be widespreadenvironmental weeds in 5-20 years time.

Education, peer-pressure and regulations to prevent weedy plants being sold through nurseries will have meaningful change as this directly prevents then being planted.

Botanical name	Common name	Comments by Tom Ferguson & others
Acer platanoides	Norway maple	Texture Plants catalogue
Alnus glutinosa	Black alder	Texture Plants catalogue; spreads easily in wetlands
Fatsia japonica	Fatsia	Texture Plants catalogue
Laurus nobilis	Bay laurel	Texture Plants catalogue
Olea europaea	Olive	Texture Plants catalogue
Phoenix canariensis	Phoenix palm	Texture Plants catalogue
Phyllostachys nigra	Bamboo	Texture Plants catalogue; other bamboo are also weedy
Prunus lusitanica	Portugese laurel	Texture Plants catalogue
Robinia pseudoacacia	Robinia, black locust	Texture Plants catalogue; used as rootstock
Trachycarpus fortunei	Chinese windmill	Texture Plants catalogue
	palm	
Ulmus glabra	Scotch elm	Texture Plants catalogue; rootstock, spreads by seeds
Ulmus parvifolia	Chinese elm	Texture Plants catalogue; spreads by seeds

Table 4: Traditional garden woodland weed increasing throughout Christchurch

As well as novel weed, keep in mind a group of traditional "homestead weeds" that appear to be increasing their rates of spread and impact. These are familair and can be easily overlooked.

Botanical name	Common name	Comments by Tom Ferguson & otherts
Acer pseudoplantanus	Sycamore	Shade tolerant, wind-dispersed seeds
Acer species	Maples	We consider every maple will become weedy. wind-
		dispersed seeds
Berberis glaucocarpa	Barberry	Bird-dispered seeds
Betula pendula		Wind & water dispersed seeds. Problematic in wetlands
Buddlja davidii	Buddleia	Known to invade riverbeds (Marlborough)
Cotoneaster species	Cotoneaster	Bird-dispered seeds
Cratageus monogyna	Hawthorn	Bird-dispered seeds. Becoming highly problematic near
		Cheviot, still in lag-phase elsewhere
Prunus laurocerasus	Cherry laurel	Bird-dispered seeds
Prunus serotina	Black cherry	Bird-dispered seeds
Salix species	Willows	Several species have both male and female in NZ, thus
		produce wind-dispersed seeds. Problematic in wetlands.
Sorbus aucuparia	Rowan	Bird-dispered seeds, Very tough

Table 6: Weeds in weedy, damp urban reserve (Ernle Clark Reserve)

A volunteer group started weeding out elderberry, sycamore and *Carex pendula* 15 years ago, in 2006. The species in the reserve were recorded on the first Citizen Science network that morphed into iNaturalist.

Right now the weeds that smother and shade out planted trees are: sycamore, ivy, greater bindweed/convolvulus, honeysuckle, ash, box elder, tradescantia, aluminium weed, and blackberry.

	au guiden meeus, meeu	
Botanical name	Common name	Comments by Alice Shanks
Acer pseudoplantanus	Sycamore	
Cotoneaster species	Cotoneaster	
Crataegus monogyna	Hawthorn	
llex aquifolium	Holly	
Prunus laurocerasus	Cherry laurel	
Prunus serotina	Black cherry	

Table 6a. Traditional homestead garden weeds, weeded from 2006

Rowan

Table 6b. New and increasing weeds since 2016

Sorbus aucuparia

Acer negundo	Box elder	
Aesculus hippocastanum	Horse chestnut	Increasing number of seedlings every spring.
Ailanthus altissima	Tree of heaven	Suckers at long-range
Alnus glutinosa	Black alder	Increasing number of seedlings every spring.
Euonymus europaeus	Spindleberry	Increasing number of seedlings every spring.
Fatsia japonica	Fatsia	Large increase in last 5 years
Fraxinus excelsior	European ash	Increasing number of seedlings every spring.
		Wind dispersed, shade tolerant
Laurus nobilis	Bay laurel	Increasing number of seedlings every spring.

Maytenus boaria	Mayten	A coupl eof seedings, saplinges each year.
Prunus lusitanica	Portugese laurel	Increasing number of seedlings every spring.
Robinia pseudoacacia	Black locust	Seedlings increasing
Trachycarpus fortunei	Chinese windmill	Only a few, plus Himalayan fan palm seedlings
	palm	from adjacent garden.

Table 8. Potenial weeds with a few naturalised sightings

Luma apiculata Chilean myrtle Foothills (high rainfall?)

Table 9. Non-local indigeous plants as risk of altering local genetics.

The increasing number of hybrid lancewoods, lacebarks, kōwhai planted in the city streets, parks and gardens is a little understood threat to the genetic variability and diversity of indigenous Canterbury vegetation.

It is critical that plant nurseries collect seed (not cuttings) using best practise , naturally occuring populations (not mature restoration sites), well away from gardens.

Members have sighted cultivars planted into restoration sites from nurseries that do not have good traceability around eco-sourced plants.

Eco-planting is just as important as eco-sourcing. The fashion for planting marsh ribbonwood all over canterbury is now resulting in hybrid Plagianthus regius x divaricata, whoch was naturally a rare hybrid confined to coastal forest sites.

The Canterbury Botancial Society has advcated for:

- An agreed standard amongst seed-collectors, nurseries, landscapers and revegetation contactors for a definition of eco-sourcing and eco-planting for ecological resilience.
- The Ngāi Tahu view on shifting plant material within and beyond the Canterbury region.
- A framework for traceability of eco-sourced plants from collection of seed to planting.
- An eco-sourcing labelling protocol so landowners and project managers can confidently buy appropriate eco-sourced plants.
- A clear, illustrated brochure to hand to landowners in involved in restoration projects to show ecologically appropriate boundaries for different plant species.

The lack of natural forests to colonise and dilute the genetics in the Urban forest means that the source of genetic material now will drive future genetics of Christchurch's Urban forest.

Sophora	Hybirds with non-local kowhai
Hoheria	Hybirds with non-local kowhai,
Griselinia	Cultivars planted into restoration sites
Coprosma	Cultivars planted into restoration sites
Plagianthus divericata	Planted outside natural range
Ppittosporum ralphii,	Spreading in coastal areas and restoration sites
Pittosporum crassifolium	

Cordyline australis	Cultivars planted into restoration sites
Pseudopanax crassifolius	Hybrids with North Island P. Lateus, P. lessonii
	promiscuous-pseudopanax-plants/

Tree weeds of threatened Naturally Uncommon ecosystems

One way of prioritising weed effort is to focus on Naturally Uncommon ecosystems that define the character of Canterbury. The weediest Naturally Uncommon ecosystems in Christchurch city are dunes, salt meadow, Banks Peninsula basalt, braided rivers, alluvial dryland.

Dunes are threatened by taupata and karo, rock outcrops by wilding pines.

The land tenure is a mix of public, Crown pastoral leasehold, private land. This points to the need for inter-agency and landowner groups to integrate effort and funding.

https://www.ccc.govt.nz/the-council/haveyoursay/show/572#startsubmission

Canterbury Botanical Society aims to promote an interest in the study of botany, particularly the native flora of Canterbury and New Zealand. Our monthly evening meetings and field trips provide members with the opportunity to share their knowledge and to learn from others. The participation of both professional and amateur botanists in Society events has proven to be a successful combination over the years.

An objective of the Society is to promote the preservation of New Zealand plants and the habitats of those plants, to encourage public interest in this, and to co-operate with Public Authorities and others in the attainment of this objective.

The Canterbury Botanical Society endorse the Tree Policy and Urban Forest plan as one way to increase the number and diversity of indigenous local trees in the city.

Overall support

- 1. The Canterbury Botanical Society are fully support the Ōtautahi Christchurch Urban Forest Plan to increase the area of urban forest and integrate the many benefits from planting trees in the city.
- 2. The value of the urban forest to local indigenous biodiversity (especially by providing habitat for hardy forest birds) can be strengthened by adding a strong statement to the vision and guiding principles that the Urban Forest that there is an intention and plan to increase the area and habitat quality of local biodiversity in the city (the first mention of biodiversity is in the pictogram of the benefits of urban trees).
- 3. The statement that " the relationship between mana whenua and indigenous biodiversity has evolved over centuries and is an important part of Ngāi Tahu culture and identity" is best represented in the vision statement so that outcomes to strengthen this profound relationship can be formulated into a goal.
- 4. Members report on Christchurch residents' inability to name the trees around them, and the embarrassment that comes from not knowing their local flora and fauna. Pohutukawa is better known than kahikatea, kauri has better name recognition than tōtara. The Urban Forest is the cty's chance to bring these trees from the hills and the Plains into people's everyday life.
- 5. The Urban Forest requires many stands of knowledge to get the right tree in the right place. It can only be done with Ngai Tahu knowledge of returning a connection to the forest, seed-collectors, expert nursery staff, ecologists, landscapers, urban designers, CPTD specialists, arborists, skilled contractors, and a welcoming public.

Comments on Species selection

- 6. The society sees no need to be prescriptive about the percentage of tree species. Rather we wish to see a clear statement about the mix of exotic and local indigenous trees.
- 7. The Society would like to see more (diverse) small trees planted eg. *Coprosma virescens, Coprosma crassifolia, Coprosma wallii,* weeping matipo/*Myrsine divaricata*. This may mean an expansion of the Council's definition of a tree as they do have multiple stems and sucker. We would like to point out that pruning suckers is less onerous than pruning branches.
- 8. The Council must not create a burden for future generations by planting weed trees. Weed trees can be identified by consulting the CCC weed plan, ECan Regional Pest Plan, NPPA list, and observations arborist and Council parks rangers. Examples of trees that are current or potential trees are listed in Appendix I. Wilding pines and eucalypt trees should be removed from the Port hills to reduce wilding spread and fire risk.
- 9. Increase the number and diversity of local indigenous trees in streets and parks by following best-practise eco-sourcing (collect from Banks Region, collect seed from 20 or more trees).
- 10. Trial local indigenous trees as street trees; kaikomako, porokaiwiri/pigeonwood, tītoki, tōtara, matai, kānuka, kāpuka/broadleaf, tūrepo/milkwood, and kahikatea, houhī, and pōkākā in damper swales.

Comments on landscape design

11. We support the planning of space for trees in all new suburbs. Treed space needs to be accounted as an asset and not a cost to the city.

Comments on public perception of trees

- 12. The Society considers that campaigns are required to change public acceptance of:
 - a. more trees and less sunlight, rather, the integration of trees though the whole of the urban design life cycle.
 - b. Now is the time to grow trees for the hot days ahead. Many citizens are still focussed on retaining as much winter sun as possible to the detriment of large tree canopies to cool their houses and gardens in summer
 - c. the time trees take to grow; trees don't "grow on trees".
- 13.Developers need to be incentivised to plan for trees from the outset when design and scoping of new suburbs and planning for large trees in intensive housing developments

- 14. Reimagine the green spaces in industrial areas. Narrow concreted strip gardens are inimitable to a long-lived tree with good form.
- 15. The Council need to consider the benefits of evergreen trees. Currently the city forest is dominated by deciduous trees that drop their leaves in Autumn, clogging drains at the start of the winter rains.

Comments on the management of the existing Urban Forest

- 16. The city residents and contractors need to respect trees as living organisms. Too often trees are seen as shelter to park under, gouging out ruts, compacting roots. Carelessness sees asphalt creep into river corridor when roads are resurfaced along the rivers. To give trees the best chance to mature careful mowing and weed-eating would reduce ring-barking and wounding young trees.
- 17. Experiment with different planting plans to promote bird habitat. For example, copse of native trees increase habitat for hardy bush birds
- 18. The Council could explore overseas models to harness citizens to look after trees, for example, watering young trees, reporting broken limbs.
- 19. There is huge potential along the Opāwaho / Heathcote River to plant up to a 70% tree canopy. Planting local native trees adjacent the Site of Ecological Significance (SES 25 Opāwaho / Heathcote River) will improve the shading of the river and create a corridor of tree canopy for hardy forest birds to move up and down the river, to and from the Port Hills forest, as a "stepping stone" further into the city and westward to the Waimakariri river forests.

Comments on Biosecurity

- 20. It is an unnecessary biosecurity risk to bring pohutukawa, rohutu (and other myrtaceae), and kauri trees down from North Island nurseries.
- 21. Stop planting non-local kowhai. These *Sophora godleyii, S. chathamica, S. tetraptera* favoured because of their single stem trunks will eventually cross-pollinate with the local naturally-occurring *Sophora microphylla*. The tangled stage of *Sophora microphylla* is part of Canterbury's distinctive natural heritage.

Plant for more droughts, more wind, more intense rainfall

22. There is evidence that drought resistant trees planted in towns/cities loose that resistance due to watering. Experimentation with planting and watering regimes and selection of trees for a drying city would be an investment in a climate-resilient Urban Forest.

23. Match soils, landform and hydrology to the species. Too many trees in the city fail because the people planting have not understood the importance of matching the tree species with the micro-topography.



Pruned kanuka as a street tree, Naenae, Lower Hutt



Pruned Tarata/lemonwood surviving the urban heat effect in a Napier carpark.



Phoenix palm, Addington. Urban palms are a looming weed issue for a heating city.



Bowenvale Valley. The whauwhaupaku by the bridge finally succumbed to possum browse. Urban possums and deer are another threat to tree survival.


Southern motorway berm plants, knocked and wounded by mowers.



Narrow bank for large tree, Beckenham Loop.



Ironic landscaping "welcomes" travellers" to "our" place in the world with plants from anywhere but Aotearoa. What does it say about this city when they hide their local flora from the world? Kowhai sourced from the McLeans dryland, 3 km away would have been just fine.



The Urban Forest needs a muti-disciplinary team, including ecologists. The embarrassing story that the kōwhai tree planted to turn the first sod on the Kōwhai solar park was the limestone kōwhai, *Sophora longicarinata*, is already circulating in botanical circles. Above is a photo of what should have been planted – a tree grown from seed of *Sophora microphylla* in the Christchurch drylands.



Wilding totoki growing close to a building, St Ninian's church. Likely a bird-dispersed wilding from Putaringamotu, tīitoki was planted in Cashmere and Fendalton.



Ernle Clark Reserve woodland, purchased in 2011, is an example of a woodland that is managed to grow a native forest in the shelter of the century-old oaks, ash and elms. It is a slow process of natural regeneration from early native planting sby the Clark family, weeding out competing trees, and new planting. The volunteers that help estimate that it will take 100 years before the canopy is largely native.



Natural regeneration under woodland trees in 12 years, September 2010 to August 2022



The Islington kōwhai was the last of a copse of trees deposited by the last flood from the Waimakariri. Just like a tsunami marker this was a tangible reminder of the main risk to Christchurch. Pointlessly cut down by 2016 once protected tree status was removed (too short, multi-trunked). The stump is now a mnemonic for importance of tree protection for more than a desirable "European" tree form.



Hickory Place kōwhai, 1955-1959. (<u>www.canterburymaps.nz</u>) The Urban Tree plan rightly places protection of existing urban trees exist first, increasing the urban forest second.



The hardy, easily-grown ti kouka grow forever on the Canterbury Plains. Listed as a taonga tree by Ngāi Tahu this tree species is now rare on the Plains. It deserves to grace out city, in places of honour where the leaves can naturally mulch down. The tree provides shelter and berries for birds (especially kereru, and dried, rolled leaves cocooning spides, moths and other insects.



6 March 2023

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Hello,

Submission on Ōtautahi Christchurch Urban Forest Plan

The Waihoro Spreydon-Cashmere-Heathcote Community Board appreciates the opportunity to provide a submission on the Council's Ōtautahi Christchurch Urban Forest Plan.

The Board's statutory role is, "to represent, and act as an advocate for, the interests of its community" (Local Government Act 2002, section 52). The Board provides this submission in its capacity as a representative of the communities in the Spreydon-Cashmere-Heathcote area.

Trees are key to mitigating climate change, making our neighbourhoods more liveable and providing corridors for wildlife. We strongly support the Urban Forest Plan's aim to grow our tree canopy and sustain a healthy urban forest over the next 50 years. But we ask that the following changes be made to better achieve this aim.

We urge the Council to adopt more ambitious targets for canopy cover, particularly by 2030, to bring Christchurch more in line with other cities around New Zealand.

We ask that the sale of Council land takes the plan into account, particularly any land with the potential to provide future additional canopy cover in areas where housing intensification is anticipated. And we ask that there is a focus on land acquisition to enable more trees to be planted in strategic locations, particularly to mitigate the impact of intensification and ensure equitable distribution of canopy cover.

We support the proposed financial contribution required from developers who do not have at least 20% canopy cover on sites. We ask that this is partly allocated to community initiatives to plant trees nearby.

We support the "right tree, right location, right function" principle, and ask that natives are prioritised where appropriate.

We ask that there is a focus on food resilience, with targets to plant more fruit trees where appropriate.

The Board would like to speak to this submission.

Ngā mihi,





A

Callum Ward Chairperson, Waihoro Spreydon-Cashmere-Heathcote Community Board



The Christchurch Civic Trust Inc. PO Box 2632, Christchurch 8140, New Zealand

6 March 2023

CHRISTCHURCH URBAN FOREST PLAN CHRISTCHURCH CIVIC TRUST SUBMISSION

As expressed in its Mission Statement, "The role of Christchurch Civic Trust ('CCT') is to promote civic pride in Christchurch and surrounds by its ongoing public advocacy for good urban design and architecture, and by raising public awareness of the importance of the city's natural and built heritage."

CCT congratulates CCC for drafting the city's first Urban Forest Plan, and for this public consultation process. The draft plan has a range of positive aspirations but in important respects it falls well short of community expectations.

Benefits of Urban Trees

In the identification of benefits of trees for urban areas, all the benefit categories listed are good (except detail of tree sequestration metric is wrong- 150kg C02/annum is 10 X too high); however, other extremely important benefits that trees bring to our city are overlooked, for example;

- sheltering effects (CHCH is a highly wind exposed city, and <u>large</u> trees, in proportion to their height and canopy spread, have an important sheltering/amenity function)
- noise reduction (trees have an important amenity function reducing and softening traffic noise and industrial noise, their effectiveness being in proportion to density and height of tree cover)
- urban ugliness screening (trees can screen and soften the sheer ugliness of many urban and industrial buildings),
- energy savings (a benefit of trees that provide shade is the lowering of temperatures in hot summer conditions which saves energy on cooling devices in houses; factoring in the energy savings is a big plus).

- trees are audible, (trees generate a background of natural sounds, caused by the play of wind amongst leaves and branches, each tree having its own sound identity, again loudness in proportion to tree size)
- the uplifting beautiful gift of autumn colour (brought by a myriad of introduced deciduous trees, exquisite changing leaf colours without equal in the technological world)
- wildlife habitat improvement (there is no mention of the opportunity to improve wildlife habitat with increased presence of trees, again the benefits in proportion to the variety, density, extent and size of tree cover).

Map, p8: Distribution of Canopy Cover

It is excellent that this GIS imagery mapping of canopy cover has been undertaken. However it is too higher scale to provide detail needed for useful analysis and planning.

It is requested that higher resolution (clearer) versions of this map are provided for representative areas, suburbs, so that communities can better interpret the actual distribution of tree cover in their areas of interest. This is needed to help engage people's interest in the urban forest plan, for a more collaborative approach between CCC and communities and interested parties into the future.

Looking Across our District

The first paragraphs are about context, and make the first reference/distinction in the document between native and exotic trees.

We suggest the 'them and us' distinction between native and exotics is unhelpful to a more holistic and objective assessment of the place of different trees in our city.

All trees are native to our planet; a tree is a tree is a tree, miraculous, with different attributes a consequence of their evolutionary histories, in different geographic localities, imprinted in their DNA. We need to be careful of the rabbit hole which too narrow a focus on natives can lead to, such as eco-sourcing, which is territorial, narrow local focus thinking.

We strongly support maximising and protecting genetic diversity, which is an important and doable mission in the context of the Urban Forest Plan. This has already been done by happenstance whenever people since time of settlement have moved new plant material, new species, new subspecies, more variety into the embrace of our city's gardens and treed landscapes.

With climate change, tree species from warmer climes will increasingly flourish in and enrich our Urban Forests, both 'introduced' species, and 'native' species, the latter including many northern subtropical species that are absent from the local 'eco sourced' repertoire. For example, pohutukawa, kauri, kaka beak, manuka; and red, silver, and mountain beech.

A request: Please use the term *indigenous* in preference to *natives*. And more important, use the term *introduced* in place of *exotic*. Exotic has become an emotive terminology amongst some quarters. It has inappropriate connotations, and feeds an unthinking tendency toward botanical 'separatism'.

Tree Heritage

The paragraphs under the title Tree Heritage are extraordinary for their inadequacy, omissions, and bias, and raise the question about the competence, knowledge, and objectivity of CCC staff who wrote and checked this section.

Christchurch has an extraordinary world class tree heritage story which is entirely overlooked in the draft Urban Plan narrative. How is this possible? Christchurch's tree heritage story is the foundation of our city's history and identity. People who have knowledge and love of trees and know Christchurch's remarkable tree history celebrate this legacy, and people even chose to visit and live in Christchurch on account of this legacy of areas of exceptional trees.

The draft Urban Forest Plan should include a survey map of Christchurch's vegetation cover that was prepared by Captain Thomas's surveyors in 1849, a year before the Canterbury settlement. Below is a copied version which includes an overlay of modern streets.

In 1850 when Canterbury settlement began, the subject area of Christchurch City Urban Forest Plan, and an area of some 20,000 hectares, was effectively devoid of forest on the plains excepting two 20 hectare remnants at Riccarton Bush and Papanui Bush, and similarly small patches on the Port Hills.

Christchurch's 1850 vegetation cover was 99% recorded as swamp, tussock, and patches of scrub, effectively a blank slate with respect to tree cover. This description is the factual place to start the account of Christchurch's urban forest story from. In 1850 only 1/1000th of greater Christchurch was forest.

The introduction and establishment of trees into this barren environment in conjunction with development of buildings, roads and houses turned Christchurch from a zero forest start into a city with significant tree cover, has to be one of the great stories of urban development. Christchurch: a city of abundant trees, and trees of exceptional variety.

Christchurch today possibly has the greatest diversity of trees species of any city in the world, although Auckland and Melbourne might well contest.

The Urban Forest plan uses the term biodiversity. CCC might well document our diversity of tree species, and challenge other cities to do the same. We rightly celebrate human and cultural diversity, should we not likewise celebrate tree species diversity, inclusively, covering both introduced and indigenous species?

Our city's plantings began with the Canterbury settlement pioneers who were intent on creating more hospitable and attractive landscapes in which to live. They also were plant collectors and plant spreaders, agents of change and established trees sourced from all around the world (not Just Britain which has a meagre 15 indigenous tree species). This tree establishment effort required knowledge and skills honed by centuries of experience with cultivating trees in the settlers' homelands. It is no accident that the city's first mayor was a nurseryman, nicknamed 'Cabbage Wilson'.

Parkland plantings, woodland areas of predominantly deciduous species were established, which are today the largest oldest most impressive tree areas, our city's most important and beautiful forest landscape settings.

The draft Urban Plan highlights the leadership role and authority of mana whenua. We suggest the plan should focus on all people. A perverse outcome of focus on mana whenua is the singular championing of eco-sourced indigenous plantings, which are already extremely well represented in CCC council plantings, and Riccarton Bush.

For objectivity's sake it is noted Māori period fires burnt millions of hectares of indigenous forest in Canterbury, including the subject Urban Forest area. There is no record of tree nurseries, or plantings, or fire control measures, to repair the fire damaged ecosystems. The plan references sustaining mahinga kai, which deserves fuller explanation in the context of the city's trees. It is noted there are numerous varieties of introduced fruit and nut trees that provide an abundance of food for people's sustenance as well as being a major part of our city's economy, whereas there are no indigenous trees that have this specific function.

The plan defines tree cover as being vegetation taller than 3.5 metres. Forests are composed of trees, trees with dominant trunks, not shrubs, which by definition are multi-branched, and areas of which are shrublands, not forests.

We suggest it is important to distinguish trees from shrubs in the urban forest plan, and suggest the emphasis and challenge of the Urban Forest Plan should be to maximise the presence of tall trees and forest cover or woodlands, for the extra benefits they provide.

Tall trees are superior to shrubs for multiple reasons, sheer scale and presence, providing a tall over-canopy for city dwellers, providing safer nesting and shelter habitat for bird life, sequestering significantly more CO2, providing greater shelter and shading benefits, and stronger visual presence, and enabling the experience of being within and under a canopy of trees.

Medium sized trees < 6-10m tall, especially evergreen indigenous trees, have an essential year round screening capability, providing a privacy function, or for example hiding industrial sites.

Plantings of indigenous multi stemmed small tree species are increasingly a feature of riverside, wetland, and parkland areas. These tall shrubland/low forest plantings are not people friendly, with low branches obscuring passage and views.

General Comments:

Canopy Cover

The canopy cover reduction from 15.59 % down to 13.56% actually indicates a 13% reduction in 3 years, or close to 4% per annum. This is an alarming reduction rate, and seems not to be credible. Was there a change between the survey parameters?

The comparisons with Auckland and Wellington are also questionable, as ChCh Urban Forest Plan subject area contains extensive rural land, and in the case of Wellington in particular, remnant and regrowth indigenous forest is widespread and often supressed by extreme wind exposure, and introduced trees are much less a feature of the city area.

Species diversity

Species diversity is celebrated on one hand, and does not reconcile with the emphasis on eco-sourced indigenous species

Christchurch indigenous tree species diversity is significantly lower than subtropical northern NZ indigenous forest. As temperatures warm more northern species can be expected to do better in CHCH.

Tree Heights

The plan refers to trees up to 45 metres high, and references Riccarton Bush, where the tallest trees are just 35 metres, a consequence of damaging wind exposure. It would be useful to identify the tallest tree species, as they have proven resilience, maximise benefits, and should be a focus of future plantings where possible.

Equitable tree coverage

CCT strongly supports striving for more equitable tree coverage across suburbs of our city.

Changing Climate Conditions

With climate heating more extreme conditions will impact plants. Regulation of water loss to avoid desiccation is a key factor for trees, and in the absence of near surface ground water, drier areas will be most affected. Indigenous vegetation generally has poor water loss regulatory capabilities owing to evolution in moist environs. Many introduced tree species are pre-adapted to drier conditions, and are advantaged in drier soil areas, as evidenced by the dominance and exceptional growth of many introduced tree species across the city. For example, the giant Eucalyptus viminalis on Yaldhurst road, or the giant girth of E delegatensis in Hagley Park.

Carbon Sequestration Goals

A recurring theme of the Urban Forest Plan is utilising the sequestration capacity of trees in the quest for net zero emissions.

Christchurch population is c. 400,000, and rapidly growing. Average C02 emissions per person are c. 8 t C02/ha/yr, about 3.2 million tonnes total per year for the city.

The sequestration capacities of trees range widely. For indigenous species sequestration is very slow, and expensive, whereas for certain fast growing introduced tree species sequestration rates are high and the cost of removing each tonne of CO2 is low.

For pure indigenous plantings undertaken by CCC the costs of establishment will typically be c. \$30,000 to \$60,000 per hectare, and after 50 years of growth the sequestered carbon about 250 tonnes/ha total. The cost of each tonne removed and stored is upwards of \$300/tonne C02.

Introduced species such as eucalypts can be established for c. \$3-4000/ha, and can sequester 1500 tonnes in 50 years, at a cost around \$30 per tonne.

Clearly it is more cost effective for climate action purposes to sequester carbon using the capabilities of introduced tree species.

100,000 hectares of fast-growing carbon forest could potentially sequester the city's entire current emissions. If indigenous eco-sourced plantings were deployed for sequestration purposes about six times the planted area would be required, and at a cost about 60 times higher.

Clearly the Urban Forest Plan area has little potential for carbon sequestration to help achieve net zero. The city should look further afield for suitable land for this purpose.

Key points

The CCT requests stronger emphasis on planting more large deciduous tree species to create more extensive tall tree dominated urban forest landscapes on public and private land.

The city should create an arboretum park containing representatives of all the city's tree species, a place for learning.

Christchurch should seek to function as a refugia for endangered tree species. A notable example is European Elms, once one of the most celebrated trees in Europe, now effectively extinct in Europe due to Dutch Elm disease. It thrives in Christchurch, protecting the DNA of its lineage.

Deciduous trees are especially important for the character of the city, bringing colour and cheer to the city as winter approaches. Because of the variety of deciduous trees in the city autumn colours feature for months, unlike in continental Europe and Nth America where autumn colour is over in weeks. Tall deciduous trees provide shade in summer and allow sunlight through in winter, another important feature which evergreen trees cannot provide.

More planting and protecting of trees on private land could be encouraged by providing token rates relief to private landowners who deliver the benefit of more tree cover to their neighbourhoods.

Finally: CCC should develop a far stronger programme of identification and protection of notable trees across the city, and provide rates relief and or financial assistance to property owners who host protected notable trees for the benefit of their neighbourhoods and the wider community.

With stronger presence of trees, there are tipping points for birdlife recovery, and much of the city currently devoid of species such as Kereru and Bellbird can look to such special species becoming widely abundant.

Christchurch Civic Trust supports a more ambitious Urban Forest programme for Christchurch, so the city can be deservingly celebrated as 'The City of Trees'.

Submission prepared by: Mark Belton, BSc, Dip.Nat.Res., professional forest ecologist Board Member Christchurch Civic Trust Member Hagley Park and Open Spaces Subcommittee



North Canterbury Branch of Forest and Bird Protection Society

Feedback on Christchurch City Council Urban Forest Plan 2023

The [Royal] Forest and Bird Protection Society, with its mission to protect New Zealand's unique flora and fauna, celebrates its centenary this year. The North Canterbury Branch of the Forest and Bird Protection Society has been operating since 1946 and is active in restoration, pest control and supporting the community conservation. We work from the Lewis Pass Reserve to the Rakaia River, where we share an interest with the Ashburton Branch.

We welcome this opportunity to submit on the Christchurch City Council Urban Forest Plan 2023.

Our Branch strongly supports the sentiments of the Plan, and the use of natural solutions to both mitigate and adapt to climate change by increasing the tree canopy cover within the city. We would urge the Council to be even more ambitious in its goals. We see this as an investment in infrastructure and a contribution to objectives and policies in our national, regional, and local legislation and plans and strategies to achieve these.

We appreciate the opportunity to make the following submissions:

- Frameworks: The understanding that this plan provides Nature Based Solutions now internationally recognised as one of the most powerful tools to use in addressing climate change...(see <u>https://www.iucn.org/our-work/nature-based-solutions</u> and <u>https://www.forestandbird.org.nz/campaigns/adapting-climate-crisis</u>, should be explicit, and highlighted in this Urban Forest Plan, as should its role in fulfilling obligations under the Resource Management Act¹ and National and Regional Policy Statements , and strategies such as the Christchurch Climate Resilience Strategy and the Christchurch City Council's Biodiversity Strategy.
- 2. Leadership in biodiversity protection: While we acknowledge that exotic trees species are an important part of this plan, we see this as a major opportunity for promoting, and for celebrating, our own indigenous biodiversity. The Christchurch City Council's Biodiversity Strategy identifies that "The Councils indigenous biodiversity priorities are to protect existing biodiversity in threatened land environments and to protect existing habitats for indigenous Biodiversity and nationally and locally threatened species" and "The Council has a leadership responsibility in the protection of and enhancement of indigenous biodiversity in Christchurch and Bank Peninsula."

¹ (see RMA section 31 (1)(b)(iii)

This delineates a particular responsibility in the Urban Forest Plan, and we recommend the use of, and active promotion of the **Ecosystem Mapping** supported by the city in the past. (The mapping resulted from cooperation between the community group Christchurch-Otautahi Agenda 21 Forum and all the Community Boards and, realised in the work of Lucas Associates, was adopted by the City <u>https://ccc.govt.nz/environment/land/ecosystem-map</u>

This Ecosystem Mapping approach with its integral scientifically researched basis for the ecosystem planting, was **disseminated in a way that was accessible to everyone,** and this approach is endorsed. On-line access AND printed booklets allowed residents to look on the maps and find their own sections to find the appropriate planting, even in shady or sunny parts, and the food for native birds and other fauna. Booklets were available at Community Centres and Libraries and plant lists at every plant centre (with many Plant centres taking this aboard with enthusiasm and supporting it with the appropriate eco-sourced plant stock. Forest and Bird was active in promoting this and making sure that weed problem plants were discouraged in plant centres.

- 3. **Eco-sourcing responsibility**: Noting that Biodiversity is accepted to include 3 levels, genetic diversity, species diversity and ecosystem diversity, we seek that the careful consideration be given to eco-sourcing the native species used within the plan. The importance of eco-sourcing has been highlighted in previous submissions and reference made to correspondence between the Canterbury Botanical Society and Environment Canterbury regarding an urgent call for a Canterbury Regional Policy on eco-sourcing plants (November 2018); and the Canterbury Regional Council Guidelines for native plant procurement and eco-sourcing (August 2019).
- 4. **Avoid invasive species proliferation**: As said, we acknowledge that exotic trees species are an important part of this Plan, as important to the wellbeing and cultural heritage of the city. However, we submit that rigorous consideration is required to prevent planting to become the source of future weed and invasive pests, especially given the climatic changes we face in the future bringing winds, floods and new fauna.
- 5. **Sponge city:** Adaption to climate change alerts us to the need to recognise rising sea levels, and the importance of coastal wetlands and much maligned "swamps" in absorbing some of this erosion of the City's past coastal and estuarine profile.

We urge that this be considered an opportunity to restore biodiversity and natural habitat for our indigenous fauna which have been squeezed out in the past. Estuarine areas should be specifically restored and enhanced to this end and we urge the city to realise, *now*, some of its long-term planning for this work. We also note the opportunity to revisit and revive the CCC Parks Units own 1990's Waterways Enhancement projects managing urban streams as natural ecosystems.

Thanking you for this opportunity.

Urban Forest Plan 2023 Personal Submission

Colin D Meurk ONZM



As a member of $\bar{O}p\bar{a}waho$ Heathcote River Network (OHRN), and many other societies around the city, I am making this personal submission but endorsing that of the OHRN.

I will add my comments by referencing the OHRN submission numbering system.

Under A

2. I would add here (as potential subheadings – f, g, h) the **CHCH Biodiversity Strategy** (see item 4), The **CCC Tree Policy** (item 7), and the CCC response to governments intensification regulation (for the valid purpose of arresting further urban sprawl onto prime agricultural land and hazard-prone land. Note I have written a contract report for CCC on the intrinsic values of biodiversity for this evolving policy. Visibility, dominance, and prevalence of these elements are vital to not only the ecological functioning and support of native wildlife, and in some cases the proliferation of biosecurity risks, but also the place-making effect on the citizens and visitors to the city – overcoming the 'extinction of experience' so prevalent in a city dominated by trees from other parts of the world. Invasive species widely used for amenity in the city include sycamore, yew, horse-chestnut, alder, ash, holly, douglas fir, maytens, cherry blossoms, elm, hawthorn, pine, macrocarpa, Myoporum insulare, and others which are becoming established – grey willow, ivy ... There are also some north island species that are displacing local species – karo, hoherias, Pseudopanax lessonii.

It does seem surprising that all these elements are not wrapped together in an integrated way.

3. note that the ecosystems referred to here either support carbon sequestration (wetlands) or low forest. It should be noted that tree cover is based on a minimum tree height of 3.5 m, and dunes, coastal bush and riparian environments all support trees of that stature.

4b. enhancement = restoration in the social as well as ecological sense – increasing visibility/conspicuousness.

7a. this is the minimum expectation, but the same should apply across the city regardless of proximity to SES. By restricting it in that way, given that most SES are on the periphery of citizen's regular experience, reinforces the notion that 'native plants should be where they belong – out of sight, out of mind'. This also reinforces the 'inferiority complex' surrounding indigenous species/taoka.

9-17. when it comes to catchment and riparian corridor planting, there should be consideration to the catchment dynamic with likelihood of increased storm events and more extreme flood deluges. Accordingly, revegetation should ideally commence at the very top tributaries of the rivers so that flood force is dissipated progressively downstream, rather than face the catastrophic avalanche of logs and tree waste into the lowlands as has occurred in the recent Cyclone events in the Hawkes Bay.

11. Patch configurations meurk & hall 2006 and UK planning for green space and woods (Shinrin Yoku) within easy walking distance of every residence. These become bush sources (rather than remnants) and new sources of the ecological and sociological halo effect.

15. note large trees should primarily be planted on north sides of streets. But also note that mixed podocarp (or other noble native tree) and deciduous trees in streets means that especially in winter, shading from the occasional large tree is only for a short period – maybe an hour at most as the sun moves around.

B. Page 12

2b I am also reminded by pest management operators that there is a critical need to maintain very low numbers of possums in the city for the (especially indigenous) tree cover to thrive. One could also note that the feral rock pigeons are out of control in the city and are already causing environmental deterioration that is affecting trees health. This is even happening in Riccarton Bush.

2c see 2 above.

Page 14 There is a personal pledge booklet put out by the Redcliffs Residence Association. The increase of trees should also be seen as an important sequestering function – and especially long-lived native podocarps - totara, matai, and kahikatea – which potentially will accumulate carbon for up to a millennium. They can also be part of a sustainable continuous canopy harvesting regime for timber supply that doesn't require toxic preservative treatment.

Page 15

1 see 9-17 above.

Page 16

1 agree with OHRN, this statement is just reinforcing a mythology that has a role as a small place as a museum piece, but is anachronistic, anti-biodiversity, and costs enormous amounts to maintain, especially in the autumn leaf fall. There should be gradual indigenous noble tree enrichment of parklands towards at least a 50% ratio of deciduous and evergreen species. Perhaps the most important reference that should be front and centre in this debate is the ccc own random citizen survey from around 2006 that showed than around 56% of citizens wanted more native plants in their neighbourhood, and 6% want less. 75% wanted more native birds. These numbers are increasing. It is very obvious what the vast majority of modern citizens want for their city.

Final Aspiration

Kowhai (a species classically reflective of the Canterbury Plains and outwash plains of braided rivers has become impressively conspicuous in the past few years. This suggests and branding of "The city of golden winters" – as the kowhai begins to make its presence felt throughout Ōtautahi from trees that were begun to be planted widely in local gardens in the last 30 years or so.

TE ARA MARA FRUIT LOOP



MASTER PLAN

AIM: To provide alternative food sources within Otautahi, Eastern Suburbs to help redress issues around food security for these areas. This aims to create an alternative food system within the built landscape that provides fresh produce via linkages between existing alternative food sources i.e community gardens, and the linkages themselves.

This addresses key themes:

- Availability
- Accessibility
- Food resilience
- Food resilience
- Community/public space reclamation
- Community needs and sovereignty of food
- Urban structure

ROLE: My role within this project is to assess existing urban structures and identify public space that best suit application of this multi- nodal approach to food resilience within the urban space. Landscape ecology patterns, urban planning principles and guidance from Georgina Stanley and Claudia Silva who are both leading development and providing academic frameworks for this project.

MEASURES OF SUCCESS: Claudia Silva will provide qualitative measures for community engagement and provide the body of research for which this project will be founded on and measured against its findings. Also design principles will provide broad measures of success. Ultimately the use and level of engagement from the community will dictate success as the project requires the communities use and adoption of this project for it to sustainable which critical aspect of the fruit loop.

• 15 trees/households per street to be classed as an edible street

•

TIMELINE

15-20years implementation of this project. Phasing based of geographical locations termed as linkages and nodes. Stakeholders will determine where the loop is ultimately integrated into the urban fabric.

- 1. Bromley 1
- 2. Wainoni and redzone glade 2
- 3. Stanmore road 3
- 4. TBC

STAKEHOLDERS

More specific stakeholders will be identified across development cross stages of the loop as the loop is of significant scale and will ultimately involve up toto thousands of people as this project is for communities across the east.

- Residents
- Georgina Stanley
- Auriella Bainbridge
- Claudia Silva
- CCC
- Smith Street Urban Farm
- Community gardens
- Edible Streets Society
- Community Rangers
- Community Group

GOVERNANCE

Guided by edible streets constitution and attached policies.

FUNDING

MANAGEMENT

Fruit tree distribution

- Tree Species
- Sourcing
 - o Nursery
 - Suppliers

Resource procurement, storage, and distribution

- Fruit tree Stock
- Compost

Community engagement

Fruit tree maintenance

Proposed node landscape management plans

TARGET COMMUNITIES

BROMLEY SUBURB:



Site extent:

Characteristics of community:

Key Stakeholders:

Key Community Input:

Rationale Behind targeted Streets:

WAINONI SUBURB:

AVONSIDE SUBURB:

DALLINGTON SUBURB:

RICHMOND SUBURB:

PHILLIPSTOWN SUBURB:

WALTHAM SUBURB:

OPAWA SUBURB:

WOOLSTON SUBURB:

LINWOOD SUBURB:



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URBAN FORESTS

https://ccc.govt.nz/environment/trees-and-vegetation/tree-and-urban-forest-plan/ Make it easier to find these resources on the Christchurch City Council website. Put links to resources/maps/design guides where residents & developers look first. Promote these resources on Christchurch City Council social media pages/profiles. Create 'sound bite' visual/shareable posts for social media, based on the information under the 'Environmental', 'Economic', 'Social' headings.

Community education is the key to residents engagement & participation in building an Urban Forest.

PLANNING

- Christchurch Urban Design Panel:

https://ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/urbandesign/urbandesignpanel https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Urban-Design/ ChristchurchUrbanDesignPanel-DesignReviewGuidanceAndInformation.pdf

Approved Urban Design plans (from Council/private developers) made available online for each Ward in: https://ccc.govt.nz/culture-and-community/statistics-and-facts/community-profiles/ & https://ccc.govt.nz/thecouncil/how-the-council-works/elected-members/community-boards/ under 'What's happening in your area', 'Resources'.

Resource for residents to utilise in making landscape design decisions for their property (types of trees that grow well in their area, location, visual reference, type/colour/height of tree).

- Christchurch City Council 'Urban Design Guides and Guidelines':

https://ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/urbandesign/urbandesignguides/ - Christchurch City Council Urban Forests 'Tree Planting Guide':

https://ccc.govt.nz/environment/trees-and-vegetation/tree-and-urban-forest-plan/tree-planting-guide Add type/colour/height of tree, native or introduced, approved or pest, link to reference photo, soil conditions, to the table.

Add guide to this link:

https://ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/urbandesign/urbandesignguides/ Promote this guide on Social Media.

- Create Christchurch City Council Planning Landscape Design Guides for: Natives, Introduced Trees, Residential, Developers

Planning Landscape Design Guides made available online for each Ward in https://ccc.govt.nz/culture-andcommunity/statistics-and-facts/community-profiles/ & https://ccc.govt.nz/the-council/how-the-council-works/ elected-members/community-boards/ under 'What's happening in your area', 'Resources'.

Promote these guides on Social Media. - Christchurch City Council/Lucas Associates Ecosystem Map

https://ccc.govt.nz/environment/land/ecosystem-map/

http://www.lucas-associates.co.nz/christchurch-banks-peninsula/ecosystem-map/ Add map to this link for each Community Board: https://ccc.govt.nz/the-council/how-the-council-works/ elected-members/community-boards/ under 'What's happening in your area', 'Resources'. This information is important for residents to know when planting trees & growing food to eat.

- Christchurch City Council Fruit Trees (promote this map on social media) https://smartview.ccc.govt.nz/map/layers/trees#/@172.65369,-43.50847,14

- Check/remediate soil conditions in liquefaction affected areas.

- Check/remediate soil conditions in red zone for contamination: asbestos, lead paint, residual building/ landscaping materials, chemicals, sprays used on gardens.

- Incentives for Developers & Residents to include trees in their landscape plans.

- Discount on specific trees at Christchurch City Council affiliated tree nurseries, with proof of rates/resident. - Trees first, developments second. Plan around trees, if at all possible, before considering the relocation/

removal of trees. - New cycle lanes vs removal of existing significant trees, that are also part of the community identity/ landmark, other options need to be looked at as part of the design process, last resort to remove existing significant trees.

- Main Roads with central tree planted island dividers, some with cycle lanes, in between lanes: Bealey Ave, Fitzgerald Ave, Harewood Road, Linwood Ave improve the temperature of the main roads & community wellbeing.

LOCATIONS

Opportunities to plant more trees for the Christchurch City Council Urban Forest:

- New Developments (add appropriate trees based on height/location).

- Residential (add trees along the front/back fences of a property, rather than side fences, boundary/shade issues).

- Ōtākaro Avon River Corridor

https://ccc.govt.nz/parks-and-gardens/regenerationareas/otakaro-avon-river-corridor

- Port Hills (utilise walker/runners using this area, create 'planting/watering' events)



10

SHIRLEY

ROAD

RISE UP



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https://ccc.govt.nz/parks-and-gardens/regenerationareas/port-hills/

- Christchurch City Council Sports Fields (protection from weather for spectators) https://smartview.ccc.govt.nz/map/layers/parks#/@172.65369,-43.50847,14

- Ministry of Education Christchurch Schools (collaborate to add trees to school fields as protection from weather & fruit trees for children/local community to eat) https://www.educationcounts.govt.nz/find-school

 Corrections NZ Christchurch Prisons (collaborate to grow trees in a secure spacious environment, prisoner education & rehabilitation, probation services)
 Christchurch Men's Prison: https://goo.gl/maps/16xTM34ZJ8zt9N7Z8

Christchurch Women's Prison: https://goo.gl/maps/9d1G4PHu51Y6sbqX6

TELL OUR STORIES

"A huge part of Christchurch's built environment, particularly heritage buildings, has been lost as a direct consequence of the 2010 - 2011 earthquakes. By and large, though, the city's trees, including its wonderful collection of Heritage and Notable trees, have survived the destruction - and provide a great sense of continuity and also reassurance: that something of value has not only survived but continues to flourish." Helen Lowe, Christchurch-based author

"There are many New Zealand gardens and public spaces worthy of conservation because of what they tell us about our history, our people and the way landscapes have been used...we often think about buildings but forget that the spaces between them are just as important. Many people neglect the meaning and structure of open spaces which are in danger of disappearing because of development pressures to rebuild the city. We can lose what was essential to the original form of the city, and our connection to our past and its people."

Dr Wendy Hoddinott, Landscape Architect

The quintessential photo Hila Oren captured of the girls dressed in kilts, walking to school through the trees and daffodils, had me thinking...Christchurch is still 'The Garden City'. How many photos did you see on social media this weekend, of people admiring the cherry blossom trees in full bloom around Hagley Park? http://riseuprichmond.nz/think-christchurch-with-hila-oren/

- Christchurch Beautifying Association

"Founded in 1897, the Christchurch Beautifying Association has been a strong advocate to make this city as one where beauty is respected and encouraged."

http://www.christchurchbeautifyingassn.org.nz/

- City Beautiful: the First 100 Years of the Christchurch Beautifying Association by Thelma Strongman "The illustrated centennial history of the Christchurch Beautifying Association celebrating its achievements in transforming the city into 'the garden city'." <u>https://christchurch.bibliocommons.com/v2/record/S37C246327</u>

- Christchurch City Council Significant Trees

Significant Trees are identified on the Christchurch City District Plan, under the 'Natural and Cultural Heritage' tab: <u>https://districtplan.ccc.govt.nz/PropertySearch/PropertySearchContainer.html</u> <u>https://ccc.govt.nz/consents-and-licences/resource-consents/resource-consent-activities/general-rules-and-</u>

information/protected-trees-and-guidelines Add 'Significant Trees' to <u>https://smartview.ccc.govt.nz/</u>, under 'Find', so residents can find out about & con-

nect with the history of these trees.

- Lucas Associates Ecosystem Map

"Learn about the soils & historic indigenous vegetation in & around Christchurch." https://ccc.govt.nz/environment/land/ecosystem-map/ http://www.lucas-associates.co.nz/christchurch-banks-peninsula/ecosystem-map/

- Papanui Bush & Riccarton Bush

https://ccc.govt.nz/environment/trees-and-vegetation/tree-and-urban-forest-plan/natural-forest-history/ "Riccarton Bush Pūtaringamotu is a 7.8-hectare remnant Kahikatea Forest situated just 3km from the city centre of Christchurch."

https://riccartonhouse.co.nz/riccarton-bush/

- William A. Sutton: https://riseuprichmond.nz/richmond-people/

- Sutton Heritage House and Garden Charitable Trust: http://www.suttonhouseandgarden.org.nz/

- Sutton's Place: https://riseuprichmond.nz/suttons-place/

"Artists often do have a connection to their garden and you can see Bill's personality come to life in his. He was very fond of trees and plants and designed and planted the garden himself. He had lots of natives and a love of contrasting textures, shapes, leaf forms and colour."

"Like Bill Sutton's garden. If we didn't have his garden, we could lose some of what Bill offered the world. He's contributed so much through his art. His garden gives us valuable insights into his way of life as an artist and the way he saw the world through it."

Dr Wendy Hoddinott, Landscape Architect







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https://www.landscapearchitecture.nz/landscape-architectureaotearoa/2021/10/18/0l4979gram2uyk2ldeu5ouwr0xppgp

- Richard Bedward Owen/'River Bank' Owen

https://riseuprichmond.nz/richmond-people/ https://christchurchcitylibraries.com/Heritage/Publications/RichManPoorMan/RichardBedwardOwen/ 'Rich Man, Poor Man, Environmentalist, Thief' by Richard Greenaway: <u>https://</u> christchurch.bibliocommons.com/v2/record/S37C276787

- River Road Park: <u>https://riseuprichmond.nz/river-road-park/</u>
R. B. Owen Lime Trees (Richard Bedward Owen/'River Bank' Owen)
"In a ceremony on 1 September 1929, politicians local and national planted 53 lime trees on the north bank between the Swanns Road bridge and Medway Street."
It would be nice to replant these 53 lime trees to honor and tell R. B. Owen's story.

- River Bank Centre: https://riseuprichmond.nz/river-bank-centre/

- Retreat Road Park: https://riseuprichmond.nz/retreat-road-park/

- Red Zone Futures: Heritage

"While we at Heritage NZ know a lot about the Red Zones history, the communities that lived here know a lot lot more. We need to think about what technologies are available for us to record these histories and to keep retelling them into the future. We also need to think about how to anchor those stories to the place. In the Red Zone here in Avonside we can see a number of established trees and plantings, these would be connected to people's home, to businesses, to life in this area. So we probably need to think about how we are going to protect these trees and plantings into the future to ensure the stories remain connected to the place."

Dr Christine Whybrew from Heritage New Zealand

http://riseuprichmond.nz/red-zone-futures-heritage-dr-christine-whybrew-from-heritage-new-zealand/

- Kerrs Reach: https://riseuprichmond.nz/kerrs-reach/

- Woodham Park: https://riseuprichmond.nz/woodham-park/

- Overwintering Parks in NZ (Add 'Monarch Butterflies Overwintering' locations to https://

<u>smartview.ccc.govt.nz/</u>, under 'Find', so residents can enjoy learning about the whole life cycle of the monarch butterflies. This is a great learning activity to get children involved in the environment.)

"The overwintering stage in New Zealand starts in April or May. This is when swarms of Monarch butterflies form regularly to overwinter at places around the country.

These Monarchs that overwinter in the trees live for about 7-9 months."

https://thebutterflymusketeers.com/2017/05/24/the-butterfly-musketeers-monarchs-overwintering-parks-innz-wintering-spots/

- Dudley Creek Trail: Bring residents out into their local communities to appreciate the existing tree canopy while walking along Dudley Creek & finding information about local birds/sites/Dudley Creek Flood Remediation.

https://riseuprichmond.nz/dudley-creek/

- George Malcolm, Landscape Architect, Emmett Street Block, Shirley

http://www.lucas-associates.co.nz/assets/Document-PDFs/Shirley-Concept-Plan.pdf, Page 15. https:// goo.gl/maps/Q4ZkBeyzCJJGzYKn9

"A feature of the [Shirley] area is the tree lined streets which are a result of George Malcolm's design… Today the large Scarlet Oaks are a unique feature of the area."

"George had a prolific career in landscape architecture and a life member of the NZILA. Much of his work can be recognised around Christchurch, including the Canterbury University grounds."

"For the Emmett Street Block subdivision, the planners had originally allocated just 3 different species of shrubs and hedge plants; crab apples were the common street tree available.

George organised the establishment of a nursery on the old Ballantyne* Block in Hansons Lane in Christchurch so there were more plants available for housing developments - especially large trees.

At this nursery, George began to propagate big trees with the help of a large glasshouse gifted to him from the Burnham Military Camp."

*Interestingly, my family shifted back to Christchurch when I was a teenager & our home was on Ballantyne Avenue.

When my son was born, we shifted to Shirley. Two things sold me on moving across the city to this area: we attended antenatal classes at the Shirley Community Centre & driving through Emmett Street underneath an impressive canopy of established Scarlet Oak trees.

- Dudley Street Trees

"Dudley Street Oak: The trees are Quercus x heterophylla, aka Bartrams oak, which are rare in both the Christchurch and NZ context. Arguably, they also constitute the single most significant feature in the Dudley Street Character Area."

https://givealittle.co.nz/fundraiser/chchnotabletrees/updates/ae01d924 https://riseuprichmond.nz/dudley-character-area/ https://goo.gl/maps/2hcH5BeRCvAtVh5i9







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OPPORTUNITIES

- Community Education through learning libraries & climate change campus, to educate & connect residents to the trees in their local areas. Intergenerational opportunities.

- "SAP" Program: 'Sponsor A Plant', interactive web based sponsorship program, any one in the world can help with the replanting of the Corridor, selecting from a range of plants, yearly sponsorship fee includes: photo updates and gps location of planting so visitors can find 'their' plant in the Corridor, incentive to come to Christchurch and see 'their' plant in person.

Collaboration with Christchurch City Council, ChristchurchNZ & The Christchurch Foundation: <u>https://</u> <u>christchurchfoundation.org.nz/</u> http://riseuprichmond.nz/draft-oarc-regeneration-plan-feedback/

- utilize enviroschools & community gardens

- collaborate with Ministry of Education, to plant more trees in around schools & their sports fields/ playgrounds, protection from the weather

- utilize school climate change protest children to grow & take care of trees in their local communities

- utilize students needing credit to obtain credits for NCEA, Duke of Edinburgh, Cubs & Scouts etc

- utilize students studying related courses at tertiary providers

- tree support education: selecting a site, soil condition, sun/wind/frost issues, watering/feeding, health issues

- Christchurch City Council Promotional Materials: tree guide for residents/developers, social media posts, make better use of images from reports by sharing them with residents

- Christchurch City Libraries: Community Education in Learning Spaces for residents/developers in local suburban libraries, Seed/Plant/Tree Swapping Events, Local Garden Tours

- StoryWalk(R): Promoting literacy, reading, health, exercise, and movement in communities and neighbourhoods. Connecting books about trees/birds/climate change to local park trails. <u>https://letsmovelibraries.org/storywalk/</u>









BANKS PENINSUI Conservation tr

Submission to: Our Urban Forest Plan for Ōtautahi Christchurch 2023 On behalf of: Banks Peninsula Conservation Trust (BPCT) Contact details: Penny Carnaby Chair Banks Peninsula Conservation Trust

If there are public hearings, we wish to appear in person to support this submission.

1 Introduction

The Banks Peninsula Conservation Trust is pleased to see the development of the Urban Forest Plan for Ōtautahi.

While the Trust's conservation activities cover the entire area of the Banks Peninsula Ecological District and range from habitat protection and enhancement, Pest Free Banks Peninsula management, volunteer programmes and community education programmes. For the purposes of this submission to the Urban Forest Plan, we have focussed our comments on the urban and peri-urban parts of the Banks Peninsula Ecological district pertaining to the current Urban Forest Plan submission process, including Taylors Mistake, Sumner, Redcliffs, Port Hills and the Whakraupō catchment area.

We are pleased to see that there will be a further consultation on the rural areas of Banks Peninsula planned 23/24.

We are supportive of the submission made to the Urban Forest Plan by the Banks Peninsula Native Forest Climate Change group (BPNFCCG).

2. About the Banks Peninsula Conservation Trust (BPCT)

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

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

Recognised nationally by the Ministry for the Environment and Department of Conservation with the 2017 Green Ribbon Award for Community Leadership, with a national award for Community-led Biosecurity from the Ministry for Primary Industries, and as the winner of the 2022 Canterbury Aoraki Conservation Board Te Waka o Aoraki Conservation award, the Trust is known as a highly successful, community-driven conservation organisation and a leader in biodiversity protection.

The wide-spread community support for our conservation efforts is the result of: (a) working with landowners in an empowering way through voluntary

protection methods; and (b) operating in a collaborative way that engages the community and provides the linkages between community aspirations for biodiversity protection and enhancement, partnership and funding support from the corporate sector, and the local authorities and agencies with a mandate for conservation work.

The Trust has a reputation for taking a strategic approach to biodiversity management and protection and is recognised as being highly efficient and effective with the resources available, achieving far more through fostering community effort.

All of BPCT's activities are guided by the **2050 Ecological Vision for Banks Peninsula (including the Port Hills)**

In 2017, BPCT led the development of, and launched, the Banks Peninsula/Te Pātaka o Rākaihautū (including the Port Hills) Ecological Vision 2050 <u>www.bpct.org.nz/bpct-2050-ecological-vision</u> A range of organisations and agencies (including CCC) and the Banks Peninsula community support the **eight Ecological Goals** set out in this Vision. The eight Goals are aspirational but achievable, and are being used to guide ecological restoration work to result in a substantial improvement in the state of indigenous biodiversity on Banks Peninsula/Te Pātaka o Rākaihautū by 2050.

All 8 Goals are interrelated, and together contribute a significant improvement in the protection and enhancement of indigenous terrestrial, freshwater, and marine biodiversity on Banks Peninsula. These goals align well with the biodiversity priorities outlined in the Ōtautahi Climate Resilience Strategy and the draft Ōtautahi Christchurch Urban Forest Plan.

The 2050 Ecological Vison for Banks Peninsula <u>www.bpct.org.nz/bpct-2050-</u> <u>ecological-vision</u> brings together a range of aligned organisations and agencies (CCC/ECAN/DOC) and landowners to support the **eight Ecological Goals** set out in this Vision. The Vision delivers an aligned, joined up voice for all the outstanding activities and projects which enhance the and restore the unique indigenous biodiversity of Banks Peninsula including the Whakaraupō catchment.

Several of the Goals are relevant to the draft Ōtautahi Christchurch Urban Forest Plan, including:

Ecosystem restoration: Goal 5 and Goal 6 2050 EV

https://www.bpct.org.nz/bpct-2050-ecologicial-vision Supporting private landowners and communities to protect and enhance indigenous biodiversity within settlement areas (as well as in productive areas), rare and common indigenous flora and fauna, through protection and enhancement of existing habitat, promotion of planting appropriate habitat linkages, encouraging an increasing diversity and abundance of local species, and ongoing ecological monitoring, as well as providing a variety of community education programmes on biodiversity enhancement and protection. There are several BPCT/QEII conservation covenants in the City catchment areas including an urban BPCT covenant in Cashmere, and Te Ahu Pātiki 500ha of iconic land including the summits of Mt Herbert and Mt Bradley.

Te Kākahu Kahukura: Goal 4 2050 EV <u>https://www.tekakahu.org.nz/</u> is a landscape scale project on the Southern Port Hills to restore a thriving and resilient indigenous forest supporting an abundance of native birds and invertebrates. This taonga for Ōtautahi is being realised through a BPCT-led collaboration of landowners, residents, and 20 not-for-profit organisations/ Ngati Wheke, /agencies (CCC/ECAN/DOC/SDC).

Pest Free Banks Peninsula (including the Port Hills): **2050 EV goal 8** <u>https://pestfreebankspeninsula.org.nz</u> This project is facilitated by BPCT and is a collaborative programme led by 14 partner organisations targeted to protect and enhance biodiversity on the Peninsula through the widespread removal of animal pests. Involving CCC/SDC/ECAN/DOC, iwi, aligned organisations, and landowners on Banks Peninsula.

3. General Comments

While BPCT is generally supportive of the vision and goals described in the Urban Forest plan and congratulate the CCC on this vision for the city, we have some general comments for consideration.

- Fostering areas of naturally regenerating native forest is an effective way of sequestering carbon and enhancing biodiversity compared with (or in addition to) the planting of individual trees.
- To protect and enhance biodiversity gains, animal pest and weed control should be part of all planting and natural regeneration strategies.
- There are many existing Banks Peninsula projects. The Pest Free Banks Peninsula project has 14 partner organisations. Te Kākahu Kahukura

project has 20 partner organisations. Both projects are supported by CCC.

- While BPCT is not against pine plantations per se, we do consider that pine forests are often problematic planted in the soils and steep terrain of Banks Peninsula, often causing sedimentation runoff into BP water catchments. Current settings in the ETS incentivise the planting of monocultures/pines. BPCT has the view that there are greater biodiversity gains to be made in naturally regenerating native bush and native tree planting than in pine plantations.
- Native trees are likely to sequester a greater amount of carbon than pines over the longer term and especially when planted within a native habitat planting design (due to their greater resilience to wind, fire), and are without the inherent problems of wilding confers. As an example, Cyclone Gabrielle has demonstrated on the Volcanic Plateau how vulnerable plantation conifers can be to extreme wind.
- Within the Whakaraupō catchment area and other peri-urban parts of the city, wilding pines are a significant weed problem.
- Weed management must be part of the Urban Forest plan. Our biodiversity resilience is being threatened by increasing weed pests.

Many tree species are current biodiversity weed pests, such as Sycamore, and many others have the potential to be long term weed threats, such as Ash. Consideration of species selection and proximity to open space or native habitat should be considered.

- Browsing feral animals (deer/ goats/pigs) and other pests e.g. possums are currently having a large negative impact on biodiversity gains in both urban and peri-urban areas of the City. Existing pest control initiatives including those already carried out by CCC and community led agency supported projects, such as Pest Free Banks Peninsula <u>https://pestfreebankspeninsula.org.nz</u> and Predator Free Port Hills <u>https://www.predatorfreeporthills.org.nz/</u>, should be leveraged and further funded. Pest control must be part of the Urban Forest Plan.
- Permanent protection of regenerating native forests with strategies for monitoring, weed and pest control are the most effective ways of maximising biodiversity and carbon sequestration gains. Existing protection strategies delivered through CCC, DOC, ECAN should be supported as should both conservation covenanting authorities: QEII Trust <u>https://qeiinationaltrust.org,nz</u> and the Banks Peninsula Conservation Trust (BPCT) <u>https://www.bpct.org.nz/</u>.

• The Urban Forest plan should consider targeted 'enrichment planting' of old-growth tree species that are now rare in the Christchurch area (such as tōtara, mataī, kahikatea, and tītoki) because seed sources are so limited the natural spread of these species will take many centuries. This process can be sped up through strategic enrichment plantings where these species are planted into existing areas of regenerating forest and restoration plantings at low densities, with the expectation that they will provide a seed source and will eventually become the top canopy species within mature forest. Te Kākahu Kahukura project is currently planting 10,000 podocarp species over 5 years in the southern Port Hills as part of our enrichment planting programme.

3. Goals and Targets further comments

"The Urban Forest Plan underpins the Council's Strategic Priorities of 'Meeting the challenge of climate change through every means available"

3.1 Plant

Our urban forest canopy cover is growing sustainably

Sustainable growth needs to be appropriate for the land type and take into account the lifecycle of the trees. In order for us to grow our canopy cover we need to take a two-pronged approach. First we need to retain what is already there; and second, we need to plant more trees.

There are many excellent examples of private landowners, including Trusts, choosing to covenant or retire and protect areas of regenerating forest in the peri-urban parts of the city, particularly areas in the Whakaraupō catchment.

Ōtamahua Quail Island Restoration Trust <u>https://www.quailisland.org.nz/</u> can be referenced as a transformational community-led native tree planting project. Over 30 years the community has planted over 100,000 eco sourced trees on the island. There is now canopy cover and natural regeneration of native plants is occurring.

Importantly there has been a concentrated programme of pest and weed control which has helped indigenous biodiversity to thrive. Projects of this kind

require constant management. In recent times deer incursions on the island have damaged plantings. Pest threats such as these need district wide support.

3.2 Nurture

"Planting more native trees in public space enhances Ōtautahi Christchurch's indigenous biodiversity and sustains mahinga kai, as well as providing a food source and movement corridors for indigenous wildlife.

The best way to support indigenous wildlife is by enabling indigenous vegetation cover. BPCT recommends using ecologically sourced native plants, managed in such a way as to allow natural regeneration to follow, and encouraging the planting of indigenous corridors and pocket plantings. Ongoing enhancement planting will be useful in areas where regeneration of certain species, such as podocarps, would be slow. Species planted should be well adapted to the conditions of each specific site and represent as closely as possible the original vegetation for that location; while also being appropriate to any surrounding infrastructure, buildings, and social aspects of the site.

BPCT is currently working in partnership with the Lyttelton Port Company (LPC) on the Port Saddle restoration project above Lyttelton. The project covers 17 hectares and has been identified for community recreational use, ecological protection and enhancement of indigenous flora and fauna. The land adjoins the urban settlement of Lyttelton and links into CCC and DOC managed reserves.

3.3 Protect

Our urban trees are valued and looked after as critical infrastructure

Protecting trees can come in many different forms from regulatory protection, such as trees listed in the Christchurch District Plan, through to improving the status of trees to see them treated with equal importance as other critical infrastructure.

Increasingly Trusts and private landowners are choosing to protect their native biodiversity through the mechanism of covenanting areas of their land ensuring long term protection and management of this land. There are two conservation covenanting authorities working in the area apart from CCC and DOC: Banks Peninsula Conservation Trust (BPCT) <u>https://www.bpct.org.nz/</u> which works locally with landowners and managers on Banks Peninsula (including the Port Hills) to protect and manage regenerating native forest and significant areas of biodiversity. (BPCT has just signed its 100th conservation covenant on Banks Peninsula); and QEll Trust <u>https://qeiinationaltrust.org,nz</u>.

The BPCT is working with landowners to raise awareness of the options available to them to derive an income from the native forest carbon sequestered on their land both through the Emissions Trading Scheme (ETS) and voluntary carbon market. In the last year it has been encouraging to see that more landowners have been successful with ETS applications relating to regenerating native forest on their land.

We note that the CCC "will undertake a desktop analysis of their current urban forest to locate areas that can be included in the ETS or other verified programmes for offsetting the Council's carbon footprint and provide additional funding sources to invest in our urban forests". We also note the intention to "Accurately calculate the carbon sequestered by urban trees and report on its contribution to the City's net zero gas emissions by 2025." When undertaking these assessments, the BPCT recommends that the CCC draw from the considerable expertise of the Banks Peninsula Native Forest Climate Change Group BPNFCCG (see BPNFCCG submission to the Urban Forest Plan)

3.4 Involve

Our urban forest is nurtured by partnerships and participation

The Council plays a leading role in growing and managing our urban forest, but success also requires collaboration and partnerships with mana whenua, community groups and property owners.

One of the signatures of the BPCT is our ability to facilitate effective collaborative projects involving landowners, agencies and organisations to deliver positive biodiversity outcomes in the urban and peri urban parts of Banks Peninsula. As an organisation we pride ourselves in delivering community led, agency supported projects and urge CCC to leverage the proven capability of BPCT to help you to deliver the Ōtautahi Urban Forest plan.

Banks Peninsula Native Forest/Climate Change Group (BPNFCCG) Submission to: Our Urban Forest plan for Ōtautahi Christchurch. March 2023


Banks Peninsula Native Forest/Climate Change group

Comprised of representatives from: Agri Intel NZ Banks Peninsula Conservation Trust Carbon Crop NZ **Christchurch City Council Environment Canterbury Federated Farmers** Forever Forests NZ High Bare Peak Lucas Associates Manaaki Whenua / Landcare Research Maurice White Native Forest Trust (Hinewai Reserve) **QEII** National Trust Orion New Zealand Ltd Rod Donald Banks Peninsula Trust Whaka-Ora Healthy Harbour

Submission to: Our Urban Forest Plan for Ōtautahi Christchurch 2023 On behalf of: Banks Peninsula Native Forest Climate Change Group (BPNFCCG)

Contact details: Penny Carnaby representing BPNFCCG

If there are public hearings, we wish to appear in person to support this submission.

1 Introduction

The Banks Peninsula Native Forest/Climate Change group is a collaboration of individual experts from organisations/companies/agencies; Banks Peninsula landowners with a knowledge of, an interest in, and/or responsibility for the

protection and enhancement of native biodiversity and landscapes of 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 transition in marginal land use from farming to native forest, in particular through improvements to the Emissions Trading Scheme and by gaining a better understanding of the voluntary carbon market, 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 made substantial submissions to the Climate Change Response (Emissions Trading Scheme) Amendment Bill, the Climate Change (Forestry Sector) Regulations 2008 and the associated Select Committee process, to the Climate Change Commission's draft advice in 2022, as well as ECAN/CCC LTP processes.

For the purposes of this submission to the Urban Forest Plan we have focussed our comments on the urban area, and peri-urban parts of the Banks Peninsula Ecological district including Taylors Mistake, Sumner, Redcliffs and the Whakraupō catchment area, including the Port Hills and Te Ahu Pātiki.

We are pleased to see that there will be a further consultation on the rural areas of Banks Peninsula planned 23/24.

2. General Comments

While are generally supportive of the vision and goals described in the Urban Forest plan and congratulate the CCC on this vision for the city, we have some general comments for consideration.

- Fostering areas of naturally regenerating native forest is an effective way of sequestering carbon and enhancing biodiversity compared with (or in addition to) the planting of individual trees.
- To achieve greater biodiversity gains, pests and weed control should be part of all planting and natural regeneration strategies.
- There are many existing community/agency collaborations supporting planting or native forest regeneration projects which can and should be leveraged.
- Care needs to be taken not to over-claim the impact of carbon sequestered from planting trees within the city as the answer to

offsetting the City's carbon emissions. (ref. Larry Burrows, Forest Ecologist presentation to CCC Sept 2022 "Can Christchurch Plant its way out of Climate Change?")

- While BPNFCCG is not against pine plantations per se, we do consider that pine forests are often problematic planted in the soils and steep terrain of Banks Peninsula, often causing sedimentation runoff into BP water catchments. Current settings in the ETS incentivise the planting of monocultures/pines. The BPNFCCG is working hard to get changes to these policy settings, being firmly of the view that there are greater biodiversity gains to be made in naturally regenerating native bush and native tree planting than in pine plantations.
- Native trees are likely to sequester a greater amount of carbon over the longer term (due to their greater resilience to wind, fire), and are without the inherent problem of wilding confers. As an example, Cyclone Gabrielle has demonstrated on the Volcanic Plateau how vulnerable plantation conifers can be to extreme wind.
- Within the Whakaraupō catchment area and other peri urban parts of the city, wilding pines are a significant weed problem.
- Weed control must be part of the Urban Forest plan.
- Browsing feral animals (deer/ goats/pigs) and other pests e.g. possums are currently having a large negative impact on biodiversity gains in both urban and peri-urban areas of the City. Existing pest control initiatives including those already carried out by CCC and community led agency supported projects such as Pest Free Banks Peninsula <u>https://pestfreebankspeninsula.org.nz</u> and Predator Free Port Hills <u>https://www.predatorfreeporthills.org.nz/</u> should be leveraged and further funded. Pest control must be part of the Urban Forest Plan.
- Permanent protection of regenerating native forests with strategies for monitoring, weed and pest control are the most effective ways of maximising biodiversity and carbon sequestration gains. Existing protection strategies delivered through CC, DOC, ECAN should be supported as should both conservation covenanting authorities QEII Trust <u>https://qeiinationaltrust.org,nz</u> and the Banks Peninsula Conservation Trust (BPCT) <u>https://www.bpct.org.nz/</u> There are excellent examples of effective protection of regenerating forests in the Whakaraupō (Lyttelton harbour) catchment area.

We recommend the Urban Forest Plan consult Lucas and Associates
 Otautahi Indigenous Ecosystems guide <u>www.lucas-associates.co.nz</u>
 which gives detailed mapping of the local soil-based ecosystems of the
 city and a guide to the native plants that belong to each. There is further
 information on <u>www.landtyping.nz</u> The plains city ecosystem
 information is on the CCC website
 <u>https://ccc.govt.nz/environment/land/ecosystem-map</u>. People can just
 put their address in to get a list and find what's native and what belongs
 where.

3. Goals and Targets further comments

"The Urban Forest Plan underpins the Council's Strategic Priorities of 'Meeting the challenge of climate change through every means available"

3.1 Plant

Our urban forest canopy cover is growing sustainably.

Sustainable growth needs to be appropriate for the land type and take into account the lifecycle of the trees. In order for us to grow our canopy cover we need to take a two-pronged approach. First we need to retain what is already there; and second, we need to plant more trees.

There are many excellent examples of private landowners, including Trusts, choosing to covenant or retire and protect areas of regenerating forest in the peri-urban parts of the city, particularly areas in the Whakaraupō catchment.

Ōtamahua Quail Island Restoration Trust <u>https://www.quailisland.org.nz/</u> can be referenced as a transformational community led native tree planting project. Over 30 years the community has planted over 100,000 eco sourced trees on the island. There is now canopy cover and natural regeneration of native plants is occurring. Importantly, there has been a concentrated programme of pest and weed control which has helped indigenous biodiversity to thrive. In recent times deer incursions on the island illustrate that projects of this kind require constant management.

3.2 Nurture

"Planting more native trees in public space enhances Ōtautahi Christchurch's indigenous biodiversity and sustains mahinga kai, as well as providing a food source and movement corridors for indigenous wildlife.

The best way to support indigenous wildlife is by enabling indigenous vegetation cover. BPNFCCG recommends using eco/locally sourced native plants, managed in such a way as to allow natural regeneration to follow. Ongoing enhancement planting will be useful in areas where regeneration of certain species, such as podocarps, would be slow. Species planted should be well adapted to the conditions of each specific site and represent as closely as possible the original vegetation for that location; while also being appropriate to any surrounding infrastructure, buildings, and social aspects of the site.

3.3 Protect

Our urban trees are valued and looked after as critical infrastructure

Protecting trees can come in many different forms from regulatory protection, such as trees listed in the Christchurch District Plan, through to improving the status of trees to see them treated with equal importance as other critical infrastructure.

Increasingly Trusts and private landowners are choosing to protect their native biodiversity through the mechanism of covenanting areas of their land ensuring long term protection and management of this land. There are two covenanting authorities QEII Trust <u>https://qeiinationaltrust.org,nz</u> and the Banks Peninsula Conservation Trust (BPCT) <u>https://www.bpct.org.nz/</u> who work with private landowners on Banks Peninsula to protect and manage regenerating native forest and significant areas of biodiversity. Members of the BPNFCCG work to raise awareness of landowners of the options available to them to derive an income from the carbon sequestered on their land both through the Emissions Trading Scheme (ETS) and voluntary carbon market. The BPNFCCG provides a valuable forum where we all learn from each other about regulatory changes to the fast-moving carbon market.

We note that the CCC "will undertake a desktop analysis of their current urban forest to locate areas that can be included the ETS or other verified programmes for offsetting the Council's carbon footprint and provide additional funding sources to invest in our urban forests". We also note the intention to "Accurately calculate the carbon sequestered by urban trees and report on its contribution to the City's net zero gas emissions by 2025." If the BPNFCCG can assist the Council in these assessments, we would be pleased to do so.

We would be supportive of any by-laws to prohibit the establishment of any further commercial pine plantations within the urban and peri-urban sites on Banks Peninsula. With the recent examples of fires on the Cashmere Hills, and the current widespread concern about "slash", the steep nature of the terrain on Banks Peninsula would seem to be an inappropriate location for any such afforestation.

3.4 Involve

Our urban forest is nurtured by partnerships and participation

The Council plays a leading role in growing and managing our urban forest, but success also requires collaboration and partnerships with mana whenua, community groups and property owners.

The BPNFCCG looks forward to working collaboratively with CCC to meet the goals of the Urban Forest Plan and would welcome the opportunity to work with CCC on their carbon sequestration assessment of existing urban trees as well as on the complex and fast-moving policy setting of the ETS and voluntary carbon market.

ChristchurchNZ

06 March 2023

FAO: Ann Tomlinson, Engagement Manager engagement@ccc.govt.nz

ChristchurchNZ Submission

ŌTAUTAHI CHRISTCHURCH URBAN FOREST PLAN

ChristchurchNZ is Ōtautahi Christchurch's economic development agency. Our purpose is to stimulate sustainable economic growth for a more prosperous city. Our functions have recently been expanded to include urban development with a mandate to "create and implement long-term growth and development plans with multi-sector partners and to lead and invest in implementation projects to create attractive and thriving places¹". Sydenham, New Brighton and the Central City are priority areas identified by the Council for our early focus.

We appreciate the opportunity to comment on the draft Urban Forest Plan. Urban trees make an important contribution to economic and urban development in our City, some of which are stated in the document including increasing property values, improving building operational efficiencies and achieving better health outcomes for our community. Urban trees, along with other green assets, are also a vital component of liveable cities; helping to increase the overall attractiveness of a city to potential new residents, businesses and visitors, and to promote a city that puts people at its heart. Significantly, street trees promote walkability and can assist with food resilience, which are important as we respond to the challenges of climate change and the public health issues associated with declining physical activity.

¹ Statement of Intent 2022-25, page 14.

ChristchurchNZ

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Overall, we are strongly supportive of the Plan's direction but outline below some areas where it could be strengthened to better achieve its intent and the outcomes for our city.

Summary of recommendations

- a) Amend Plan to include actions to green the city more widely, recognising that a forest is not just its canopy but also its verdant understorey of flora and fauna, which in the urban context is essential for promoting a more healthy, liveable and resilient city.
- b) Amend Plan to place greater emphasis on, and a higher target for, increasing street trees, particularly in the higher density areas in and around the central city and suburban centres. This appropriately recognises that these areas are where trees are so important for mitigating and managing the impacts of denser living and supporting the take up of active transport.
- c) Amend (increase) the canopy target for commercial centres and mixed-use areas and distinguish these areas from industrial areas.
- d) Support updating the Council's Infrastructure Design Standards and better co-ordination of below and above ground infrastructure works to better manage and avoid negative impacts of tree planting on public land, particularly streets.
- e) Explore alternative funding and delivery mechanisms.
- f) Amend to address minor matters including consistent use of terminology (core infrastructure)

Submission Points

Goal 1

- 1. We support the objectives of increasing the tree canopy in our city, achieving an equitable distribution of tree canopy cover and a focus on increasing street trees. However, the current canopy target for commercial and mixed-use areas (and the streets within them) is too low and should be amended to be more ambitious and cognisant of the role and level of anticipated residential growth of these areas.
- 2. The proposed target for mixed-use zones (10% target by 2070) fails to recognise the level of intensification proposed for areas like Sydenham (6 storeys), and the benefits that tree planting can have in these (higher density) areas for mitigating the effects of tall buildings and for supporting attractive, walkable and safe neighbourhoods. We recommend that you distinguish the targets for industrial areas from commercial and mixed-use zones, to recognise that unlike industrial zones, the latter two zones are anticipated to be focal points for the community and more intensive housing.

ChristchurchNZ

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- 3. We note that one of the key drivers for the Urban Forest Plan is to assist with carbon sequestration, but an equally important aspect of our Climate Change Resilience Strategy^[1] is to reduce car dependency and promote walking as a viable and attractive means of transport. It is well documented that to encourage walkability, walking routes need to be convenient, safe and attractive^[2], and that street trees contribute to walkability by slowing vehicular traffic and providing visual interest, shade and appeal. It would be regrettable if the opportunity for Sydenham (and other high-density areas) to be highly walkable 10-minute thriving neighbourhoods, was constrained by a lack of supporting investment in street trees and other related pedestrian-friendly infrastructure.
- 4. We also believe the Plan has missed an opportunity to promote a greener urban environment more generally, recognising that a forest is not just its canopy but also its verdant understorey of flora and fauna, which in the urban context is essential for promoting a more healthy, liveable and resilient city. Actions to support a 'green throughout' strategy for the City through this Plan could support the planting of trees for food resilience, promote green infrastructure likes swales and rain gardens, and buildings which include green elements such as green roofs and walls.
- 5. The Action Plan in Appendix 1 makes clear that significantly more investment will be required to implement the Plan. We encourage the Council to consider other means of funding, noting that the (proposed) Financial Contributions Policy is only designed to *avoid, remedy or mitigate the effects of a development* and only applies to residential zones (not mixed-use or commercial zones). Other opportunities might include use of a Strategic Acquisition Fund to acquire land for new greenspaces that can accommodate new trees in deficient areas and/or the use of development contributions in growth areas like Sydenham, to support their transition into high-quality, walkable neighbourhoods. External funding and partnerships should also be fully explored, for instance by supporting initiatives like the Tui Corridor planting programme undertaken by the Christchurch Foundation and Meridian Energy.
- 6. We are pleased to see that an early action is to assess suburbs with low canopy cover to determine why it is low and to determine what can be done to increase it and we would be very pleased to be involved in this process in respect to our areas of focus.

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7. We are also supportive of the action to review Council's Infrastructure Design Standard to better support street tree planting, and consider it imperative that these standards respond to the challenges and opportunities presented by competing use of road space and the ability for it to be used as a multi-functional public asset (e.g. for walking, cycling and amenity, as well as for vehicular traffic).

Goal 2

8. This goal would benefit from more explicit recognition that trees, in particular street trees, have a significant role to play for supporting walkability in our residential and mixed-use neighbourhoods and therefore contribute to achievement of our carbon emissions reductions goals.

Goal 3

- 9. We support the recognition of trees as important infrastructure that supports green and thriving communities. In doing so, it will be important to back this up with the necessary funding for planting, nurturing and protecting trees, in the same way that Council funds infrastructure like roads and three waters.
- 10. A minor suggestion is to replace the term 'critical infrastructure' with 'core infrastructure' to avoid confusion with the term critical infrastructure used in the Christchurch District Plan and the unintended effects that might have.

^[1] <u>Ōtautahi Climate Resilience Strategy</u> page 24

121 https://www.nzta.govt.nz/walking-cycling-and-public-transport/walking/standards-and-guidelines/pedestrian-network-guidance/planning/walkability/pedestrian-network-characteristics/

Thank you for considering ChristchurchNZ's submission.

Yours sincerely,

Ali Adams | CEO | ChristchurchNZ

ChristchurchNZ

BNZ Centre, Level 3 (West), 101 Cashel St PO Box 2962, Christchurch 8140 Christchurch 8011, New Zealand

Submission #50603





Federated Farmers of New Zealand

Feedback: Our Urban Forest Plan for Otautahi Christchurch 2023

6 March 2023



FEEDBACK TO CHRISTCHURCH CITY COUNCIL

OUR URBAN FOREST PLAN FOR OTAUTAHI CHRISTCHURCH 2023

Submitter details

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FEEDBACK: Our Urban Forest Plan for Christchurch Otautahi - 2023

Introduction

- 1. Federated Farmers welcomes the opportunity to provide feedback to Christchurch City Council on Our Urban Forest Plan for Otautahi Christchurch 2023.
- 2. Federated Farmers of New Zealand is a primary sector organisation representing farming families and rural businesses in the Canterbury region, and throughout New Zealand. Farming families are vitally concerned about laws, policies, plans or regulations which affect their welfare, the environments they live, recreate and work in, and the viability of their businesses.
- 3. The economic importance of the agricultural sector to New Zealand's economy is well recognised. Its direct and indirect contribution to New Zealand's economy is about 15% and this would be substantially greater for the Canterbury region. Land-based primary sector exports comprise over 70% of New Zealand's total merchandise exports. Any regulation or additional cost which affects farm businesses has the potential to also impact, positively or negatively, on the New Zealand economy.

Key Feedback Points

- 4. If it is intended that Our Urban Forest Plan will cover rural land, the need for this must be clearly established.
- 5. Any inclusion of rural land should be done in consultation with, and with the support of, rural landowners and land-users.
- 6. Federated Farmers would like to speak with Council about any inclusion of rural land within the Urban Forest Plan.

Specific Feedback

The plan in a nutshell

- 7. Federated Farmers generally supports the Urban Forest Plan. We support the vision and guiding principles, especially the principle about planting the right trees in the right location for the right function.
- 8. The goals and targets seem reasonable. Targets for increasing canopy cover are laudable but, as stated in the final sentence of this section, targets should encourage new tree planting while avoiding unreasonable constraints on the primary, designated land use. This will encourage planting without the fear of being stuck with trees that later impede legitimate land use.

Benefits of urban trees

9. The benefits of urban trees are well summarised on page 7. In the 'bubble' about biodiversity, it might be more accurate to say that trees "sustain" rather than protect biodiversity.

Looking across our district

- 10. It is stated that the Urban Forest Plan has a strong focus on built environment areas, which relate more to the urban areas of the city and Banks Peninsula. It is further stated that a more targeted approach to the Banks Peninsula rural land will need to be developed and that this will be completed in 2023/24. There is no discussion about, or justification for, the extension of the Urban Forest Plan to cover the rural areas of Banks Peninsula. It is Federated Farmers' view that there is no need for such extension, especially given the rules designed to protect vegetation (e.g. vegetation clearance rules) and protect/encourage biodiversity in the relevant city and regional plans.
- 11. If there is any extension of the plan to cover rural land on Banks Peninsula this would need to be done in consultation with, and with the support of, rural landowners and land-users.

Issues we need to consider

Trees as part of core infrastructure

- 12. Federated Farmers supports the concept of embedding development of the city's urban forest into urban design so that it is compatible with public and private land uses. Community engagement is crucial, in relation to both the benefits of, and potential nuisance of, trees.
- 13. Under "Competition for space", it is stated that Council will need to use existing public land for planting trees. In this context, there is an excellent opportunity to plant appropriate vegetation, including indigenous large trees (such as kahikatea) in the red zone areas on the eastern side of the city.
- 14. It is stated under "Competition for space" that there are currently limited mechanisms to protect trees on private land. Care should be taken with any move to strengthen such mechanisms. It is crucial to create/maintain an environment where residents on private land see trees as assets rather than liabilities and are encouraged to plant them in the knowledge that they can be removed if they become problematic.

Changing climate conditions and impacts on the urban forest

15. In relation to Council's greenhouse gas emission targets, tree planting in the red zone (in conjunction with other planned activities) represents an opportunity to increase carbon sequestration within the city.

Goal 1: Plant – Our urban forest cover is growing sustainably

- 16. Table 1 contains targets for canopy cover by land use type. For the rural land use type (excluding Banks Peninsula) current canopy cover (2018/2019) is 11%. Canopy cover targets by 2030 and 2070 are 12% and 15% respectively. There is no discussion about, or justification for, the extension of the Urban Forest Plan to cover the rural areas (excluding Banks Peninsula). It is Federated Farmers' view that there is no need for such extension, especially given the rules designed to protect vegetation (e.g. vegetation clearance rules) and protect/encourage biodiversity in the relevant city and regional plans.
- 17. If it is intended that the Urban Forest Plan will cover rural land, this should only be done in consultation with, and with the support of, rural landowners and land-users.

Appendix 2: How we developed the plan

18. It is stated that Council set up a working group to assist with developing the plan and that workshops were held with various interested parties. If the plan is to include rural areas, then consultation with rural landowners and land users is needed. This does not appear to have been done.

Conclusion

Federated Farmers thanks Christchurch City Council for the opportunity to provide feedback on Our Urban Forest Plan. We look forward to constructive dialogue about the plan.

Karl Dean President North Canterbury Province Federated Farmers of New Zealand

DRAFT ŌTAUTAHI-CHRISTCHURCH URBAN FOREST PLAN 2023

Feedback from Orion New Zealand Limited

то:	Attn: Ann Tomlinson Senior Engagement Advisor Christchurch City Council PO Box 73016 Christchurch 8154
FEEDBACK BY:	Orion New Zealand Limited ("Orion")
ADDRESS:	Orion New Zealand Limited PO Box 13896 Christchurch 8141

INTRODUCTION

- This feedback is provided by Orion in relation to the *Draft Ōtautahi-Christchurch Urban Forest Plan* 2023 (Urban Forest Plan) document released for discussion.
- 2. Orion owns and operates the electricity distribution network covering approximately 8000 square kilometres across Christchurch and central Canterbury, between the Waimakariri and Rakaia Rivers.
- 3. Christchurch City Holdings Limited (owned by the Christchurch City Council) owns 89% of Orion and the Selwyn District Council owns 11%.
- 4. Orion distributes electricity from the national grid (owned and operated by Transpower) to service approximately 275,000 homes and businesses and plays a central role in the electricity industry, providing both essential support and lifeline services for the electricity market and critical infrastructure.
- 5. Broadly, the electricity distribution network comprises underground cables, overhead lines, substations, transformers, kiosks, electricity structures (poles/pylons, earth rods and associated buildings) and access tracks. Orion is responsible for the establishment, operation, maintenance and upgrade of the electricity distribution network. Orion and its various predecessors have been providing this essential service to the region for close to 120 years.
- Orion is a Lifeline Utility for the purposes of the Civil Defence Emergency Management Act 2002.
 Orion has a statutory duty under this legislation to ensure it is able to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency.

- 7. The electricity transmission network is identified as "regionally significant infrastructure" by the Canterbury Regional Policy Statement 2013 and "strategic infrastructure" in the Christchurch Replacement District Plan. The maintenance of supply of electricity is a critical issue for the community.
- Orion undertakes, and will continue to undertake, these activities in accordance with strict Industry Codes of Practice, Local Authority requirements, and Electricity Network Technical Specification standards. Of particular relevance to this feedback are the Electricity (Hazards from Trees) Regulations 2003 The Tree Regulations).
- 9. The Tree Regulations cover the maintenance and trimming of trees near overhead power lines. Trees or other vegetation coming into contact with overhead lines can cause damage and/or interrupt supply. In essence, the Tree Regulations promote safety and assist in maintaining a secure and reliant electricity supply by:
 - a. Prescribing distances from electrical conductors within which trees must not encroach;
 - b. Setting rules about who has responsibility for cutting or trimming trees that encroach on electrical conductors; and
 - c. Assigning liability if those rules are breached
- 10. Tree owners have the primary obligation to ensure compliance under the Tree Regulations and the Christchurch City Council owns many trees in streets, road reserves, parks and other public spaces.

GENERAL FEEDBACK

- 11. Orion is not opposed to the Urban Forest Plan in principle, in fact Orion itself has an active long term plan for increasing native plantings through its Native Forest Carbon Programme. This programme involves working in partnership with local landowners to establish native forests and aims to plant 170 hectares of native trees and plants over the next 30 years.
- 12. While supportive of the aims of the Urban Forest Plan, in undertaking future risk analysis Orion has identified that trees and vegetation constitute a medium to high risk to Orion's infrastructure. Attached at **Appendix 'A'** are examples of the results of trees located too close to electrical infrastructure. Recent weather events in the North Island have unfortunately demonstrated this, with a significant percentage of the power outages occurring as a result of trees and vegetation on power lines. Orion's Climate Change Report in 2020 recognised this risk:

"Preliminary analysis shows our biggest physical risk from climate change is likely to be from vegetation on our overhead lines causing power outages, severe storms, and drier conditions increasing the risk of fire"¹

¹ Orion Climate Change Report, 2020, page 12

- 13. The focus of Orion's feedback is to ensure that all planting undertaken in furtherance of the goals of the Urban Forest Plan **avoids** conflict with Orion infrastructure (both above and below ground) by:
 - a. Ensuring planting is undertaken in appropriate locations; and
 - b. Ensuring appropriate species are selected where planting is in the vicinity of Orion infrastructure.
- 14. The potential for conflict between infrastructure and tree planting is clearly recognised in the Urban Forest Plan, which seeks to minimise such conflicts. Orion would like to see such conflicts avoided altogether through a collaborative approach being adopted from the outset.
- 15. Orion has highlighted the following parts of the Urban Forest Plan that would benefit from amendment to ensure either specific input from Orion and/or specific recognition of the need to identify and avoid conflict with Orion's infrastructure:
 - a. The action points for Goal 1, Objective 1.1, which require a monitoring programme to be developed to track the progress of the actions in the Urban Forest Plan;
 - b. The action points for Goal 1, Objective 1.1, which require a desktop analysis to *"locate viable planting spaces across Council land"*;
 - c. The action points for Goal 1, Objective 1.2, which seek the development of "*a comprehensive list of engineering design standards to allow trees to be incorporated into our streets, and how they can be used for other functions, such as speed management*";
 - d. The action points for Goal 1, Objective 1.2, which require mapping of available spaces for planting trees within streets;
 - e. The action points for Goal 2, Objective 2.3, which look to develop "a comprehensive tree species guide to provide information on the attributes and functions a tree provides to its environment, to be used by the Council and the public" as well as stating the selection of trees will be based on the benefit they provide to their local environment.
 - f. The action points for Goal 2, Objective 2.5, which look to achieve the following:
 - Development of a comprehensive tree planting guide which will include a list of design and engineering solutions to incorporate trees into the built environment; and
 - ii. Update of the Council's Infrastructure Design Standards to include guidance on soil volume and planting practice to ensure trees have the soil volume they require to reach maturity; and include planting practices that reduce the risk of damage to infrastructure from tree roots;
 - g. The action points for Goal 3, which require the use of regulatory tools to protect existing trees on private land and prioritise the retention of trees through all aspects of Council

projects. It also seeks that trees be considered critical infrastructure.

h. The action points for Goal 4, Objective 4.2, which highlight engagement to be undertaken with iwi, developers, community groups, educational institutions, other local authorities and neighbouring councils.

SPECIFIC FEEDBACK

- 16. In respect of the action points above, Orion seeks a collaborative approach be adopted that provides for the following:
 - a. Any monitoring undertaken as part of the Urban Forest Plan should include assessment of the impacts of the Urban Forest Plan on existing and planned electricity infrastructure to ensure:
 - i. The location and type of planting has not resulted in damage to existing electricity infrastructure or impeded planned electricity infrastructure;
 - The location and type of planting has not resulted in increased costs to infrastructure providers in ensuring the planting does not damage or impede infrastructure;
 - iii. The planting has been sustainable and has not been negatively impacted by virtue of its location in the vicinity of infrastructure.
 - Analysis of potential future planting spaces, development of design standards and development of a comprehensive tree species guide should be undertaken so that avoiding conflict with electricity infrastructure informs the parameters and outcomes of the work and is central to its outcomes.
 - c. The Urban Forest Plan seeks to reduce and minimise damage to infrastructure; Orion would like to see conflict (and therefore damage) avoided completely and considers this can be achieved through a collaborative approach.
 - d. Engagement with other key stakeholders is highlighted in the Urban Forest Plan but, particularly in respect of street planting, engagement with Orion will enable planting that is successful in terms of increasing the urban canopy and in terms of protecting electricity infrastructure.
- 17. In addition to the specific points above, the Urban Forest Plan should reflect the fact that all steps taken under plan should ensure:
 - a. any proposed works are undertaken in accordance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (the Code of Practice); and
 - any planting must take into account the requirements of the Electricity (Hazards from Trees) Regulations 2003; and
 - c. there is adequate consultation with Orion in relation to the location of Orion's assets prior to any works being undertaken.

CONCLUSION

18. Orion supports the aim of the Urban Forest Plan in seeking to increase the tree canopy and sustain a thriving urban forest of healthy, diverse and resilient trees. Orion looks forward to working with the Council to ensure the Urban Forest Plan can achieve its goals in a way that avoids conflict with current and future electricity infrastructure (both above and below ground).

SIGNED for on behalf of

Orion New Zealand Limited

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Helaiks

Hannah Marks

Dated 6 March 2023

Address for service of Submitter:

Orion New Zealand Limited

PO Box 13896

Christchurch 8141

Contact person: Hannah Marks

Telephone: 021 544 929

Email: <u>hannah.marks@oriongroup.co.nz</u>

Appendix 'A'



EXAMPLES OF TREES CONFLICTING WITH ORION ABOVE GROUND LINES

New trees planted directly under lines on Dalton Place (16 February 2023). This will lead to future issues with the trees growing into the limit zones in the Tree Regulations and increase and ongoing maintenance costs for Orion.





Waiarakei Road, an example of trees that have been planted on the line side of the road, with no planting on the line-free side of the road.



A tree on the lines, 24 February 2023

EXAMPLES OF TREES CONFLICTING WITH ORION UNDERGROUND CABLES





Ōtautahi Christchurch Urban Forest Plan submission

2023-03-06 Kari Hunter

I congratulate the Council and team that have brought out this draft urban forest plan for the future well-being of our city–people and all. Increasing tree cover, especially in areas that currently have fewer trees, will make the city a healthier, more pleasant place to live. It also has the potential to save lives.

Goal 1.

I am glad to see you particularly aim to increase cover in areas that currently have fewer trees– areas especially affected by urban heat-island effects. I'm also pleased that the plan seeks to take into account tree resilience in the face of changing climate conditions – ground water, salt, storms, etc.

I would also like to see:

- Higher rates of tree cover in rural areas. This can play an important role in protecting foodgrowing land against erosion, storms and droughts. Significant tree cover can not only help provide shade and reduce evaporation, it can also affect the local weather favourably.
- Higher target for streets. We need increasing mode-shift to more active travel (the plan shows mostly cars in the streets). Shade will be important for active travellers, especially in summers with hotter heatwaves.

Goal 2.

I am pleased to see the plan address tree diversity, resilience to climate change effects, indigenous plantings and ecological corridors.

I would also like to see:

- Fruit and nut trees among in the diversity of trees, including in public spaces. It is likely that our future well-being will at times depend on being able to access locally grown food. (My view of economic well-being is not measured by how much money changes hands, but has more to do with the extent to which everyone, now and into the future, has access to good food, clean water, housing, and other needs.)
- While it is good to consider conflicts with the surrounding areas, we do need more trees, even if that sometimes means sacrificing less important uses of surrounding land.

Goal 3.

I like that the plan—rightly—treats canopy cover as essential infrastructure, and addresses maintaining and caring for existing trees.

Goal 4.

It makes sense to involve communities as well as contributing council resources to developing our urban forest.

I'd also like to see:

• Support for trees on private residential sites especially in tree-poor neighbourhoods, and where residents may have trouble affording arborist care of existing large trees. The cost of having a professional arborist assess large trees on residential properties for health and safety, and prune them accordingly, could well be beyond many low-income residents. Large trees serve the wider community. Direct arborist support from the council could help with maintaining these.

6 March 2022

Ann Tomlinson Ōtautahi Christchurch Urban Forest Plan Christchurch City Council *Feedback provided via email: <u>ann.tomlinson@ccc.govt.nz</u>*

FEEDBACK ON THE OTAUTAHI CHRISTCHURCH URBAN FOREST PLAN

Kāinga Ora – Homes and Communities ("**Kāinga Ora**"), at the address for service set out below, thanks Christchurch City Council for the opportunity to submit on the Ōtautahi Christchurch Urban Forest Plan "**Urban Forest Plan**"). This letter provides the substantive detail of Kāinga Ora's submission on the Urban Forest Plan.

Background

- 1. Kāinga Ora was established in 2019 as a statutory entity under the Kāinga Ora-Homes and Communities Act 2019 and is required to give effect to Government policies. Kāinga Ora has two core roles:
 - a) Being a world class public housing landlord; and
 - b) Leading and co-ordinating urban development projects
- 2. Kāinga Ora's statutory objective requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural wellbeing of current and future generations.
- 3. Kāinga Ora is focused on delivering quality urban developments by accelerating the availability of build-ready land, and building a mix of housing including public housing, affordable housing, homes for first home buyers, and market housing of different types, sizes and tenures.
- 4. Kāinga Ora owns or manages approximately 63,800 properties throughout New Zealand comprising of rental properties, community group and transitional housing.
- 5. Despite consenting several hundred new dwellings in the past three years in Christchurch City, the current wait list in Christchurch continues to grow and there are now approximately 1,734 applicants on the housing register¹. Christchurch City is identified as an area to reconfigure and grow Kāinga Ora's housing stock to provide efficient and effective public and affordable housing that is aligned with current and future residential demand in the area, and the country as a whole.

¹ As at December 2022 (housing-register-december-2022.xlsx (live.com))

- 6. In terms of its role as a public landlord, there has been a marked change in the type of housing that is required by Kāinga Ora's tenant base:
 - a) Demand in particular for the Christchurch City area has increased for apartments, terraced housing and for single and 2 bedroom housing required for single persons/couples. Currently the demand for a 1 bedroom typology sits at 60% of the waiting list total. The demand for a 2 bedroom typology sits at 26% of the waiting list total². This means that some 86% of wait list demand is for 1-2 bedroom units.
 - b) As a result, the size of many public houses does not match the changing demand for public housing, with a large proportion of the Kāinga Ora's current housing typologies comprising of 3-4 bedroom homes on large lots; this can be too large for smaller households and potentially considered not fit for purpose for some tenants.
- 7. As such, in addition to its role as a public housing provider, landowner, landlord, rate payer and developer of residential housing, Kāinga Ora will play a greater role in urban development more generally. The legislative functions of Kāinga Ora illustrate this broadened mandate and outline two key roles of Kāinga Ora in that regard:
 - a) initiating, facilitating and/or undertaking development not just for itself, but in partnership or on behalf of others; and
 - b) providing a leadership or coordination role more generally.
- 8. Notably, Kāinga Ora's statutory functions in relation to urban development extend beyond the development of housing (which includes public housing, affordable housing, homes for first home buyers, and market housing) to the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.
- 9. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing and has a shared interest in the community as a key stakeholder, alongside local authorities. These interests include:
 - a) Minimising regulatory barriers that constrain the ability to deliver housing development;
 - b) The provision of public housing to persons who are unable to be sustainably housed in private sector accommodation;
 - c) Leading and co-ordinating residential and urban development projects;
 - d) The provision of services and infrastructure and how this may impact on Kāinga Ora's existing housing, planned residential and community development and Community Group Housing ("CGH") providers; and
 - e) Working with local authorities to ensure that appropriate services and infrastructure are delivered for its developments.

Outline of Submission on the Urban Forest Plan

10. Kāinga Ora thanks the Council for the opportunity to provide submission on the Urban Forest Plan.

² As at December 2022 (housing-register-december-2022.xlsx (live.com))

- 11. In particular, Kāinga Ora supports:
 - a) The Council's recognition of trees as a key element in successful urban environments. This aligns with Kāinga Ora's in-house landscape design guides which inform all Kāinga Ora's projects and the need to integrate landscaping with housing.
 - b) The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 ("NPS-UD")
 - c) Strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. In the 1990-early 2000s Christchurch City Council undertook a successful 'Neighbourhood Improvement Programme' that focussed on streetscape renewal in medium density zones. These included the replacement of deep-dish kerb and channel, undergrounding wires, and the introduction of street trees and street calming initiatives.
- 12. However, analysis of the Urban Forest Plan has highlighted several matters that Kāinga Ora considers could compromise the intensification of housing and the planned urban built form that is envisioned by the NPS-UD and the associated Housing Supply Act.
 - a) Kāinga Ora supports the implementation of the intensification provisions of the NPS-UD and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (the Housing Supply Act) and ensuring planning decisions contribute to achieving well-functioning urban environments. Kāinga Ora consider the requirements to achieve 20% tree canopy cover is inconsistent with the spatial outcome requirements set out in the NPS-UD, and the Medium Density Residential Standard (MDRS) provisions of the Housing Supply Act. The tree canopy requirements in the Urban Forest Plan present an unrealistic application to more intensive housing forms/ areas in short, you cannot necessarily deliver both medium / high density housing and have 20% tree cover on private land.
 - b) It is considered that the starting base position of 20% canopy cover in the Urban Forest Plan is an unrealistic target and unrealistic comparisons have been made to Auckland and Wellington given the topography, climate variances, and pre-European dominant vegetation type between these cities and Christchurch. The UFP notes that current tree cover is only 15%, however this includes the extensive plantation forests at Bottle Lake, Mcleans Island, and Cashmere i.e. it is not <u>urban</u> forest cover. The report underlying the measurement of canopy cover notes that 65% of tree cover is located in rural and open space zones i.e. of the 15% total canopy cover, only a third is located across the urban areas of the City³.
 - c) The unrealistic comparison is self-evident in the Urban Forest Plan which identifies that the only suburbs that are currently achieving 20% cover are Cashmere and Fendalton – both suburbs with larger than normal sites and geographic features (Bike Park forest and Riccarton Bush and waterways respectively) that provide space for additional planting. It is wholly unrealistic to expect a medium density suburbs such as St Albans

³ <u>https://ccc.govt.nz/assets/Documents/Environment/Trees/Urban-Forests/Christchurch-City-Canopy-Cover-report-2018-2019.pdf</u>, para.4.2.2, page 7

or Linwood to deliver canopy cover equivalent to Cashmere or Fendalton as the built forms and underlying topography are fundamentally different.

- d) The Urban Forest Plan should genuinely be a plan for the urban parts of the City i.e. the starting point should be an accurate estimate of the canopy cover of urban areas, with a target for future years set at an appropriate level for urban areas that is consistent with a growth management strategy of accommodating growth through intensification.
- e) The Urban Forest Plan defines tree canopy cover to be trees which are 3.5m and over, and notes that it excludes many of the tree planting projects that have been undertaken in the five years prior. Much is made in the Urban Forest Plan of how measuring canopy cover helps us to understand our urban forest. By excluding planting that has occurred in the past 5 years, the data that has been used to inform the canopy cover targets is misleading. For example, the figures provided on the decrease of tree canopy cover between 2015/16 and 2018/19 are used to highlight "a trend of declining canopy cover", but do not provide any consideration in the increase in regeneration planting that has occurred in the past 5 years, particularly associated with multi-unit residential developments. The 2018-19 report likewise notes that the decline identified between the two periods should be treated with caution, and is largely caused by harvesting of plantation forest in Bottle Lake and following the Port Hills fires i.e. the provision of more housing cannot therefore be concluded as the leading cause of canopy reduction.
- f) There is minimal acknowledgement of the potential negative effects of large trees (leaf drop, root systems, building safety, inefficient use of urban land, loss of access to sunlight, maintenance costs.
- g) The Urban Forest Plan provides no incentives to support the retention of trees, but rather seeks to penalise people if they don't plant more.
- h) In terms of loss of access to sunlight, it is noted that the Council proposes to introduce Sunlight Access as a qualifying matter in Plan Change 14 to the Operative District Plan, thereby modifying density standards in a manner that it considered "best achieves an equitable outcome to sunlight access when compared to an Auckland context – the MDRS baseline". For the purpose of this submission the merits of the Council proposal for sunlight will not be elaborated on, however it should be noted that the requirement to include 20% tree canopy cover would in reality reduce access to sunlight for future residents and is therefore inconsistent with the Council's stated intent arising from its proposed qualifying matter.
- i) A key principle of the Urban Forest Plan is that trees are grown in locations that allow them to reach maturity and benefit the local environment, and appears to heavily rely on IMPs which reference Mahinga Kai and indigenous biodiversity, however the planning provisions proposed in the draft Christchurch Plan do not encourage the planting of indigenous trees, but rather fast-growing exotic species.
- j) The Urban Forest Plan fails to acknowledge the high biodiversity and ecosystem services values of smaller shrubs and plants – but focuses on a tree canopy. For example, it seeks a 75% tree canopy cover for waterway areas, when it would probably be more practical to promote smaller shrubs and plants that better restore waterway health.

Draft Financial Contributions Rule – Tree Canopy Cover

- 13. Kāinga Ora is opposed to requiring Financial Contributions ('FC') for 'developments that do not achieve the proposed 20% tree canopy on development sites'.
- 14. In principle, FCs are a tool or mechanism to enable Council to take money at the time of development to pay for (or mitigate) the effects of that development. FCs in the past have typically been used to facilitate localised infrastructure upgrades such as intersection signalisation or sewage pump station upgrades, where such are both necessary to mitigate the additional effects/ demand of a development and are not already programmed to be undertaken through Council's Long Term Plan (and are therefore already funded through Development Contributions ('DCs') and/or rates).
- 15. In this instance there appears to be no nexus between the FC and the environmental effect it is to mitigate. Landscaping provisions under the Operative District Plan and the draft provisions of Plan Change 14 are required for at least 20% of sites under the MDRS. It is question that development in accordance with the zone rules, including compliance with the landscaping controls of the MDRS cannot therefore generate an environmental effect that warrants mitigation. The proposed FC does not therefore appear to have any nexus between the environmental outcomes anticipated in the MDRS and the need for mitigation.
- 16. In a strategic sense, Council is pursuing an approach to urban growth management primarily through intensification (as opposed to greenfield expansion). No new greenfield areas have been rezoned since the Land Use Recovery Plan in 2012 a decade or so ago. No plan changes to rezone additional land are currently being progressed by Council. Whilst the Amendment Act has further enabled intensification, this does not constitute a change in strategic direction for the Council growth through intensification has and continues to appear to be the preferred growth management approach.
- 17. The effects of intensification on amenity and tree cover have therefore been anticipated for a decade or more. Council has been taking DCs (and before them reserve contributions) from infill development for at least the past 30 years to fund the acquisition of new open space to meet the additional demands generated by new growth. The effect of pursuing a growth management approach of intensification carries with it an obligation to appropriately anticipate and fund the infrastructure necessary to support that growth. This includes both network infrastructure such as roading and three waters, and also 'soft' infrastructure such as community facilities, and arguably trees in streets and parks. This is a business-as-usual expense whereby land for such planting already exists in the form of road reserves and existing open spaces, or is provided through DCs to fund new open space acquisitions. If the Council's preferred strategy for managing urban growth requires additional tree planting in public spaces, then this should (and to a certain extent already does) form part of the LTP process.
- 18. The Forest Plan is silent on the financial contribution calculations, however the proposed formula for calculating the FC contained in the technical information supporting Plan Change 14 to the District Plan, is based on one tree resulting in a future canopy of $130m^2$. Whilst not explicit, it is assumed that this figure is based on a tree with a canopy radius of approximately 6.5m, resulting in approximately $130m^2$ of total canopy area ($A = \pi r^2$). If this is the case, then a simpler formula would be to require 1 tree to be planted within the urban environment per 1,300m² of site area, as an easier compliance threshold than a trigger of 10% of future canopy cover.

- 19. The FC formula provided for the draft Plan Change is proposed to be made up of two separate elements. The first element is \$2,037+GST to cover tree planting and maintenance. The second element is to cover the land purchase cost to enable Council to acquire land for tree planting. The cost of the land acquisition element is land value x 50m² per tree. On the basis that land value in residential areas in Christchurch averages around \$800/m² (\$400k for a 500m² section) the FC could be in excess of \$40,000 per tree. To put that into context, the cost of being 1 tree short in a development is more than <u>four times</u> the Development Contributions payable per residential unit and that covers the costs of <u>all of the following matters:</u> 3-waters reticulation, roading upgrades, public transport, cycleways, community facilities, and regional parks, and local parks. Kāinga Ora also remain unable to identify why the Council has identified 50m² of land as an appropriate value to take as a financial contribution.
- 20. Kāinga Ora has significant concerns regarding the use of FC as outlined in the draft provisions for PC14 as a tool. Once notified, the proposed Plan Change still needs to go through its own process, including formal submissions where Kāinga Ora will continue to express its concern with the approach adopted within PC14. The financial contribution proposal should be removed from the Urban Forest Plan as an implementation tool until such time as the PC14 process has concluded. The Urban Forest Plan should instead focus primarily on actions that the Council can make on its land streets, parks, wetland/ natural areas.
- 21. Given that Council already own extensive areas of park and open space land (including several thousand hectares of land on the Port Hills and Red Zone), in addition to extensive road reserve and local park areas, The need for the land component to form part of the FC does not appear to have basis. It is further noted that Council takes Development Contributions for new open space as part of any new development. Where Development Contributions are taken for local parks, such parks invariably contain extensive tree cover, as amenity tree planting is readily compatible with passive recreation activities.
- 22. The need to provide rapid canopy cover potentially creates a perverse incentive to plant faster growing exotic species rather than natives. The proposed FC could therefore result in a decline in biodiversity by driving developers to plant exotics over natives, with attendant adverse biodiversity outcomes, which is contrary of the desire in the Urban Forest Plan to seek diversity in tree species.
- 23. Whilst supporting the general outcome of tree planting across the City, Kāinga Ora submits that the methods promoted to achieve the outcomes are not appropriate and require substantial review and change following further engagement with stakeholders. Kāinga Ora would welcome an opportunity to workshop this issue with the Council if such an option was made available.

Key Summary of Submission

- 24. Kāinga Ora welcomes the Council's recognition of trees as a key element in successful urban environments. This aligns with our internal landscape design guides which inform all our projects and the need to integrate landscaping with housing.
- 25. Kāinga Ora strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. Such renewals should include kerb and channel replacement, undergrounding of overhead wires, and street tree planting.

- 26. Kāinga Ora does however have concerns with aspects of the plan regarding having a 20% target that maybe in direct conflict with wider outcomes including efficient use of land and enhancement of biodiversity. Further the delivery of the Council's plan appears to rely heavily on Financial Contributions in PC14 as an implementation method when this FC has yet to be tested through submissions and hearing processes.
- 27. Should you have any questions in relation to the matters outlined above, please do not hesitate to contact me.

Dated 6/03/2023

Brendon Liggett Manager – Development Planning National Planning, Urban Design and Planning Group Kāinga Ora – Homes and Communities

ADDRESS FOR SERVICE:

Kāinga Ora – Homes and Communities PO Box 74598, Greenlane, Auckland 1546 Email: <u>developmentplanning@kāingaora.govt.nz</u>

Submission #50701



Disabled Persons Assembly Nz

March 2023

To Christchurch City Council

Please find attached DPA's submission on Ōtautahi Christchurch Urban Forest Plan

For any further inquiries, please contact:

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Introducing Disabled Persons Assembly NZ

We work on systemic change for the equity of disabled people

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People's Organisation run by and for disabled people.

We recognise:

- Māori as Tangata Whenua and <u>Te Tiriti o Waitangi</u> as the founding document of Aotearoa New Zealand;
- disabled people as experts on their own lives;
- the <u>Social Model of Disability</u> as the guiding principle for interpreting disability and impairment;
- the <u>United Nations Convention on the Rights of Persons with Disabilities</u> as the basis for disabled people's relationship with the State;
- the <u>New Zealand Disability Strategy</u> as Government agencies' guide on disability issues; and
- the <u>Enabling Good Lives Principles</u>, <u>Whāia Te Ao Mārama: Māori Disability</u> <u>Action Plan</u>, and <u>Faiva Ora: National Pasifika Disability Disability Plan</u> as avenues to disabled people gaining greater choice and control over their lives and supports.

We drive systemic change through:

- Leadership: reflecting the collective voice of disabled people, locally, nationally and internationally.
- Information and advice: informing and advising on policies impacting on the lives of disabled people.
- **Advocacy:** supporting disabled people to have a voice, including a collective voice, in society.
- **Monitoring:** monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

The Submission

DPA welcomes the Ōtautahi Christchurch Urban Forest Plan. We recognise the importance of this plan in seeking to tackle climate change issues and provide a more green-friendly aesthetic feel to the city centre.

DPA also appreciates that, in the summer months, having more trees will provide much needed shelter from what are likely to be even warmer days, something that is important for everyone, especially disabled people and older people.

DPA supports all of the goals outlined in the plan.

However, there is one area we would like to make a recommendation about and that is the placement of trees so as to ensure that both infrastructure and people are not placed at undue risk by their placement.

By this, we mean that there is the possibility of tree roots emerging over time, thus damaging footpaths impeding access for everyone, including disabled people.

In this regard, DPA acknowledges and supports the reference made in the introduction to the plan that:

"Mature tree roots can damage nearby infrastructure such as footpaths and underground pipes, however, this can be avoided through improving both the design and the tree species selected. Adhering to a rule of thumb of 'right location, right plant, right function' can avoid many of these problems. This means better integrated design and planning to select the right species and ensure the space is appropriate for the tree."

Nevertheless, DPA recommends that when engaging in planning around tree placements in the urban forest that disabled people and our Disabled People's Organisations [DPOs] be involved in discussions alongside other community stakeholders around this. This would enable disabled people to identify issues, hazards and suitable areas so as to ensure safe continuity of access for members of both the disabled and wider communities.

DPA's Recommendations

 Recommendation 1: that when engaging in planning around tree placements in the urban forest that disabled people and our Disabled People's Organisations [DPOs] be involved in discussions alongside other community stakeholders around this.
OUR URBAN FOREST PLAN

Personal Submission of Julie Tobbell.

05/03/2023.

Thank you for the opportunity to make a submission for the Urban Forest Plan consultation process. While I am the Somerfield Residents Association Chairperson, I have not had the opportunity to discuss it with our SRA Committee or any of our SRA members, therefore this is a personal submission from myself only, while I still understand and agree with what is important within our wider communities.

Many of our local residents care deeply about many of the older, existing trees within our areas and bushes bordering our local Opawaho Heathcote River, in particular.

Many in our community especially via our SRA Facebook page have appeared concerned to see as many original trees becoming cleared from properties with both houses and trees nearly 100 years old, without any attempt to retain them on the land or move them to an alternative, appropriate location.

The Council staff could be requesting for developers to retain certain heritage trees on private properties before consent be granted for some new high-density developments. Our area and others are at risk of becoming a greater flood prone area with more concrete areas permitted and no restrictions on the land being stripped off all its' mature trees.

If there is any possibility of relocating significant native / heritage trees, then this should be considered also.

I am also concerned that the planning may need to include greater planting of trees on the Port Hills which would further reduce sediment running off - & some fire-resistant natives, may reduce the fire risk. Our communities in CHCH have experience both flood and fire events & we all understand the real risk & consequences of these risks.

For this reason, I would support the intention expressed in the plan to increase the numbers of native trees, mini forests and bush patches planted across the entire city and via waterway areas, to encourage greater populations of native birds throughout Canterbury. Flood prone Sydenham Cemetery, Somerfield Park & other areas with original street infrastructure may be excellent examples of locations which may benefit from further planting and may even prevent further flooding events.

The plan's targets for tree coverage generally appear too low, especially for the residential areas, ie: our city could be aiming for at least 30% tree cover by 2070, not 20%.

Our Council staff should be aiming to plant more than 8,000 trees per year, and more widely distributed over CHCH and Canterbury to achieve a better quality of life for our future generations.

Ie: with the increased housing intensification planning our city will need a better balance of green spaces between the bigger developments.

I especially support the intention for Council staff to engage with our local communities while encouraging trees to be planned for and nurtured in all of our community areas without being removed unneccarily from some properties nor shading existing properties, in conjunction with the future higher density developments.

Julie Tobbell





The Chairman: 1 McDermott Place, CHRISTCHURCH,8025

(inc)

Submission:	Ōtautahi Christchurch Urban Forest Plan (March 2023)
Standing:	Halswell Residents Association (Inc.) is an incorporated society and a
	registered charity, and advocates for the interests of people in Halswell.
	Activities are largely carried out by a Committee of 6-8 members, which
	holds monthly meetings open to the public. For this submission, we
	discussed its potential content at a regular monthly meeting of our
	association. The final draft was approved by our Chair, Treasurer, Secretary
	and one of our Committee members. The final version will be minuted at
	the next monthly meeting.
	The Association Chairperson is John Bennett; David Hawke is Secretary, and
	Adele Geradts is Treasurer. The Association can be contacted by email at
	secretary.HRA@gmail.com

Broadly speaking, we support this Plan but we do not see a resolve from City Council to implement key aspects – particularly the protection of existing trees.

Working through each of the Plan's Goals in turn:

Goal one: Our urban forest canopy cover is growing sustainably

- 1. We support the intent of this Goal, but it fails to reflect the importance of larger patches of urban forest cover.
 - a. In our area, an opportunity was lost when City Council (against the advice of both us and our community board) decided to sell 66 Quaifes Road. Had this not been sold, it could have formed a valuable adjunct to the adjacent storm water retention basin which is planted with wetland plants.
 - b. Furthermore, the 66 Quaifes Road site would have met #5 of this goal: "Select and design planting sites to enable a tree to reach maturity and minimise conflicts with the surrounding area".

Goal two: Our urban forest thrives with healthy, diverse and resilient trees

- 1. We support the intent of this goal, but it needs to better reflect the ecological history of particular areas.
 - a. As an example of this, we now know (through the work of our association) that mataī forest was widespread in Halswell yet plantings do not reflect this. Kōwhai

would have been abundant along the margins, important for herbivorous birds such as kererū.

- b. Notwithstanding this, exotic trees can bring in the birds. Examples would be eucalypts (which encourage bellbirds) and tree lucerne (kererū).
- 2. The connectivity between patches of urban forest cover eg for birds and insects to get around is really important. However, we do not see this happening much in Halswell, especially in the new subdivisions east of Whincops Road.
 - a. One option for boosting this connectivity is via stream corridors. In Halswell, this would be Nottingham Stream and Knights Stream (both tributaries of Huritini Halswell River). The tall trees in sections along Nottingham Stream already bring in the occasional bellbird in winter.

Goal three: Our urban trees are valued and looked after as critical infrastructure

- 1. We strongly support #1 of this goal "Retain our existing canopy cover".
 - a. This needs to happen, but is currently short-circuited by developers destroying trees as they develop land.
 - b. There are many examples around Halswell, of which the photo below shows just one:



2. Furthermore, there are still a few remaining significant trees in our area. Below is a photo of a line of various trees reaching 26 m high and which (we estimate) are over 100 years old. This is on land off Halswell Junction Road opposite Nicholls Road and just west of the Country Palms subdivision.



Whether these trees survive will be a good test of City Council's resolve to implement this Plan.

Goal four: Our urban forest is nurtured by partnerships and participation

- 1. We strongly support this goal. It is already happening in our area.
 - One example you may be unfamiliar with is the native planting area being developed at Knights Stream School Mingimingi Hautoa. Here, three mataī stumps are to be incorporated in an area of indigenous planting, with their separation (c. 6 m) following the pattern of buried stumps recovered close by.
 - The indigenous plantings will be an ongoing project of the school community. They are aimed at building social connections among the learners and their families, and at mitigating the "extinction of experience" that drives a loss of connection with nature and a "forgetting" of previous ecological states.
 - ii. Building on the plantings is a display planned for the school office area, centred on a 45 cm diameter radiocarbon-dated mataī disc:



- iii. This disc supports multiple stories. Firstly, the invertebrate cavities will provide a discussion point about the cerambycid beetles that lived there, their contribution to forest ecology and as mahinga kai for Ngāi Tahu people in former times. Then, the annual rings are easily visible, there are the radiocarbon and nitrogen isotope sampling holes, and the rather rough surface cut was by the school caretaker "Matua Ross" who is on our committee.
- b. Furthermore, the school projects also fit well into an established Ngāi Tahu context for the immediate area. In a large park next to the school is a 6 m sculpture "Ōtūmatua" (artist, Fayne Robinson) that references a deeply significant local landmark of the same name, and the nearby stream also has sculpture installations.

Ōtautahi Christchurch Urban Forest Plan

Submission lodged by

Greg Partridge

After the Christchurch City Council asked for submissions on their Draft Tree Policy, the Council's Hearings Panel heard public deputations on the matter after receiving submissions from 70 individuals and groups.

The Council subsequently adopted the Tree Policy and made the following statement:

"Trees play an **integral** part in reinforcing our identity as the Garden City, a reputation which many Christchurch residents pride themselves on.

As well as their aesthetic values, trees also provide a range of other **essential environmental**, **economic and social community benefits.**

With the current challenges being faced through climate change, the **vital** role which trees play in sequesting carbon, cooling through shade and managing stormwater has never been more important.

We understand the need to take a **leadership role** in the management of trees to ensure that the many benefits provided by such a vital resource are **maintained** for future generations. Through **proactive** management of trees on public land these benefits can be **maximised and retained** for the future."

https://ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/policies/trees-policies/tree-policy

That was December 2020 – 26 months ago

At the time the Council adopted the Tree Policy, you also stated you were developing an Urban Forest Plan.

Why has it taken our City Council more than two years to action this?

Is it a case of "Corporate Constipation", or simply a delaying tactic, pandering to the wants of the profit driven property developers while the Council turns a blind eye for a few more years while greed focused developers who (for the most part) are infamously WELL KNOWN for operating a scorched earth policy of totally clearing hundreds of properties right across Christchurch of thousands of existing established trees?

Trees can live without humanity, but humanity cannot live without trees.

The topic of trees, the benefits they provide to the environment and society, along with the protection of existing trees and the planting of additional trees is not new to the Council – it has been on the agenda since at least 2009.

To quote the CCC's Have your Say webpage, trees are on the job for us, 24 hours a day, seven days a week, working to improve our local neighbourhoods, our wellbeing and helping to mitigate the effects of our changing climate.,

Has the Christchurch City Council, Councillors and Staff been on the job for the trees of our city, 24 hours a day, seven days a week since 2009?

The simple answer to that is no, you haven't. If you had then Christchurch would have had an Urban Forest Plan implemented years ago and the tree canopy coverage of our city would be in a far better state than it currently is.

The Council have moved on the matter at a glacial pace rather than with a sense of urgency and have done so in spite of a wealth of data, global intelligence and highly successful blueprints that have been implemented by cities both here in Aotearoa and even more successfully elsewhere overseas.

2009:

The New Zealand government passed an amendment to the Resource Management Act removing the ability to give blanket protection to trees in urban areas.

Before then, many councils had those rules: Auckland, for example, gave automatic protection to any native trees taller than 6m or rounder than 60cm, and exotic trees taller than 8m or rounder than 80cm. It was comprehensive enough to cover most of the majestic, mature trees

Those rules were replaced with nothing.

January 2012:

The law change came into effect immediately stripping hundreds of thousands of urban trees across New Zealand of any protection.

The law was however challenged in the Environment Court allowing some councils to keep general tree protection rules.

2013:

The law was amended once more reinstating the government's intent to strip trees of protection from being felled, and therefore leaving no safeguard of preserving them for future generations.

February 2015:

Christchurch City Council cancelled an agreement signed with heritage advocates to protect more than 800 of our city's notable trees. Those trees faced losing their protected status because of changes to planning rules, all of them on private property.

Fast forward a year

February 2016:

The Council made a U turn on that agreement cancellation, but still reduced the number of protected trees.

2017:

6 years ago, the Council received a report (written by Justin Morenroth) from the University of Canterbury on city wide tree cover?

www.ccc.govt.nz/assets/Documents/Environment/Trees/Urban-Forests/Christchurch-City-Canopy-Cover-report-2015-2016.pdf

That report highlighted a number of points to the Council

- Tree canopy coverage of Christchurch was only 15.59%
- That figure falls to only 11.6% If the commercially grown plantation forests are excluded due harvesting, deforestation, disease and fire
- Trees are not evenly dispersed across our city nor in our residential communities
- More than a quarter of Christchurch trees are marooned on isolated pockets of land (ie parks).

In terms of preventing urban heat islands from forming, that cocktail is a recipe for disaster, particularly as global temperatures steadily increase.

The University of Canterbury report identified that a little over half the CCC owned land is potentially suitable to plant more trees on. Planting trees on that land would **eventually** increase the tree canopy cover to 23.47%.

That is still a lot less than Wellington's 30%, trees would still not be evenly dispersed across Christchurch, does nothing to address the fact that developers are choosing to clear fell trees, further adds to the serious issue of urban heat islands.

We cannot simply rely on land owned by the Council as the location where trees are located. We also cannot expect that we can simply plant trees everywhere on Council owned land because of the assumption that any grassed, dry grass, or bare soil site can be planted with trees. For example (as per the report), tussock grasslands should not be planted with trees for example due to the existing ecological significance.

Hypocritically the following is on the Councils website:

"Christchurch is a green city with a resilient, sustainable and healthy environment where a mix of native and exotic plant communities reinforce the Garden City identity and supports local biodiversity".

Trees do not magically grow overnight. It takes years, if not decades to reach maturity.

The Council's target is for the residential tree canopy cover of Christchurch to increase from 13% in 2018/19 to 20% in 2070.

That equates to a 65% increase of the number of trees on residential land between those dates, and it's a fantastic target.

If developers are allowed to keep felling trees, how is that target of residential tree canopy coverage going be achievable when housing intensification will result in less open ground space being available under the National Policy Statement on Urban Development, and or Plan Change 14 which the City Council voted in favour of on 1 March 2023?

The City Council have discussed charging property developers' money if they cut down established trees, but has the City Council consider how much profit a developer can make by freeing up more land on which they can build more units?

For example, Williams Corporation are guaranteeing a 10% return to people or business that invest in their Capital Investment Fund.

www.williamscorporation.co.nz/fund/for investors

If they are guaranteeing a 10% return then the developer is obviously making more than a 10% profit. If they weren't they wouldn't be offering that investment scheme.

And if for example they are selling a unit in their Banks Avenue development in Dallington which is currently being advertised on their website for \$630,000, that equates to a sales profit of roughly \$63,000 to Williams Corporation.

If they can fit an extra couple of units on a property that's been clear felled of trees, they stand to make more than \$120,000 in profit.

Is the Council going to compromise its own commitment to the Climate and Ecological Emergency in exchange for a financial reward at the expense of the natural environment and to the community immediately impacted?

Williams Corporation are not the only developer with an investment fund scheme operating in Christchurch.

A moratorium should be imposed on the felling of all established trees in Christchurch, and without any further delay unless the Council wish to set its own targets up for failure, along with the environment of our city.

The CCC is well aware of the monumentally significant benefits that trees provide in residential areas, not only in terms of the environment, mitigating against the development of urban heat islands, the contribution they play in ensuring our water ways remain clean and that ecological systems remain healthy, but also in addition to the fact that trees provide social and economic benefits to the residents and businesses living and operating in the neighbourhood. They are detailed on the Councils own website.

www.ccc.govt.nz/environment/trees-and-vegetation/tree-and-urban-forest-plan

BEFORE





AFTER





May 2019:

The Christchurch City Council declared a Climate and Ecological Emergency with the Chair of the Councils Climate Change Working Group (Councillor Sara Templeton), saying the Emergency was a call to action.

Many other Councils across New Zealand subsequently followed the Christchurch City Council's example and in December 2020 the Government of New Zealand also declared a Climate Emergency.

Fast forward two years after the CCC's declaration of a Climate and Ecological Emergency

September 2021:

Christchurch Mayor Lianne Dalziel and Environment Canterbury Chair Jenny Hughey announced their support for the campaign to make Christchurch the first National Park City in New Zealand with the Council stating the following:

"Imagine if we could bring nature even closer to our doorstep? Imagine if we could connect with nature by simply going about our day-to-day activities.

We have the opportunity to make this happen. Cities don't need to be concrete jungles dominated by buildings and roads. They can be buzzing with nature and filled with green spaces.

There is more that we can do to make our city greener and healthier and to enhance the natural capital of our living environment.

Doing this will not only improve our health and wellbeing, it will also help us achieve our climate change goals and ensure we leave a city that future generations will be proud to inherit.

That is why we are whole-heartedly throwing our support behind The Press campaign to make Ōtautahi Christchurch, New Zealand's first National Park City.

A National Park City represents a focused, community effort to improve a city's liveability, through better connections between people and nature."

https://newsline.ccc.govt.nz/news/story/lets-make-christchurch-a-national-park-city

February 2022

The Council Urban Development and Transport Committee approved the felling of mature trees along the route along Section 3 of the Nor'west Arc Cycleway.

During 2022 hundreds and hundreds of mature trees were clear felled by property developers including dozens of mature trees on three adjacent Clyde Road properties near the University of Canterbury, rendering close to 4.5 hectares of land completely stripped of any established tree canopy.

www.stuff.co.nz/the-press/news/131225704/small-forest-of-beautiful-mature-trees-felled-to-make-way-for-subdivision?cid=app-

android&fbclid=IwAR1Wg4jsLFasQfBexezDJoGUDIMmHLV7SeWJv6Rfri4TlZ05mnoJhPIkSGk

September 2022:

"Trees are very important to the identity of Christchurch", says Mayor Lianne Dalziel. "To achieve a sustainable increase of tree canopy cover across the city one of the regulatory actions we can take is through making changes to our District Plan".

https://www.stuff.co.nz/the-press/news/129889254/council-wants-to-charge-developers-who-fail-to-retain-or-plant-enough-trees

Fast forward a further six months

February 2023

The Fendalton Waimari Harewood Community Board approved the felling of significant trees in Merivale, a fact revealed on March 1st to the full Council Meeting.

What happened to the Council's declaration of a Climate AND Ecological Emergency, the Council's public relations spin of reinforcing our identity as the Garden City, or the Council taking a leadership role to ensure such a vital resource (the trees) on public land are maintained for future generations?

Is the Council ignoring all of that and the Council's Strategic Framework Documents Strategic Priority of Meeting the challenge of climate change through every means available, and Community Outcomes of a Liveable City and Healthy Environment?

The definition of an Emergency is:

- an unforeseen combination of circumstances or the resulting state that calls for immediate action
- an urgent need for assistance or relief

The definition of Immediate is

- occurring, acting, or accomplished without loss or interval of time
- instant

In terms of trees, the protection and preservation of our urban forest – the existing established tree canopy cover of Christchurch - you have failed to treat the declaration of a Climate and Ecological Emergency with the speed and immediacy an emergency requires?

As a direct result of that trees have been vanishing from our landscape in droves across many of our neighbourhoods, and that doesn't align with the Council's Strategic Framework and is in stark contrast to much of the rhetoric that is being pumped out by the Council's Communications and Engagement team.

The Councils Urban Forest Plan has four goals listed on your website in the following order:

- Plant our urban forest canopy cover is growing sustainably
- Nurture our urban forest thrives with healthy, diverse and resilient trees
- Protect our urban trees are valued and looked after as critical infrastructure
- Involve our urban forest is nurtured by partnerships and participation

Protection of the existing urban forest **SHOULD** and **MUST** be the primary focus! A city doesn't go tearing out it's critical infrastructure to replace it with smaller water pipes for example, or fewer electrical cables.

By not protecting the existing established trees of Christchurch on both Public land and Private land, that is exactly what you are in effect endorsing.

The Councils Urban Forest Plan should be

- Protect (first and foremost)
- Nurture the existing trees to prolong their life
- Plant more trees and ensure they are nurtured through to maturity

• Involve all residents and partnerships to educate EVERYONE on the benefits of not chopping down the trees in Christchurch, including the economic benefits of retaining trees for developers.

The Christchurch City Council SHOULD BE following the inspirational environmental leadership of other local governments around the world such as the European city of Vienna, who nearly 50 years ago implemented stringent tree protection regulations into their city plan? As a result of the Vienna Tree Protection Act that city is now internationally recognized as the world's most liveable city and it now enjoys enormous environmental benefits as a direct result of its existing tree canopy coverage being not only protected and maintained, but by also added to.

The Christchurch City Council know there isn't an endless abundance of urban forest remaining throughout Christchurch and you know that since 2015 the established tree canopy coverage across our city has plummeted since 2015.

The Auckland City Council has added additional number of trees to its Schedule of Protected Trees. The Christchurch City Council hasn't added any since declaring a Climate and Ecological Emergency,

Our City Council have sat on your hands in terms of battling for much needed tree protection throughout the city they govern.

The City Council fought the Government over the proposed built environment of our city. It's now time Mayor Phil Mauger and the rest of the Councillors put their money where their mouth is, side-lined the wants of a small segment of our society (property "developers" / environmental destroyers), banned the practice of clear felling existing established trees, and fully adopted the legislation that Vienna introduced into our local laws.

