



Forest & Bird

TE REO O TE TAIAO | *Giving Nature a Voice*

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Feedback on Ashburton District Council Draft Biodiversity Strategy “Our Natural Place”

Introduction

Forest & Bird is New Zealand’s oldest environmental non-government organisation. Currently celebrating its 100th anniversary, since 1923 the Society has continuously advocated for the protection and preservation of New Zealand’s native plants and animals. Our Ashburton Branch has been and continues to be a strong advocate for protecting and restoring the district’s indigenous biodiversity and for raising the awareness of the special plants and animals that call the Ashburton district home.

Forest & Bird welcomes and is pleased to provide feedback on the Ashburton District Council Draft Biodiversity Strategy “Our Natural Place”.

Forest & Bird was a key stakeholder in the development of the National Policy Statement for Indigenous Biodiversity (NPSIB), which provides the much-needed national direction and which was gazetted on 1 August 2023. We congratulate the council on this immediate action to establish a biodiversity strategy for the district in response to its statutory responsibility under the National Policy for Indigenous Biodiversity 2023.

Forest & Bird has also been a key stakeholder in the development of the New Zealand Biodiversity Strategy 2020 Te Mana o te Taiao, New Zealand’s response to its international commitment to the Convention on Biological Diversity. Te Mana o te Taiao is a ‘cross sector’ document, which contains 2025, 2030 and 2050 goals for New Zealand’s indigenous biodiversity and relies on all sectors, across the nation, to adopt its goals if its objectives are to be achieved.

In summary, the Ashburton draft strategy provides a very good overview of the District’s indigenous biodiversity, its current state, and the issues to be addressed to protect and maintain what remains,

and to restore indigenous biodiversity, across the district in the face of a change climate. However some parts could be strengthened in order to provide more alignment with national direction and greater clarity of purpose.

Forest & Bird provides the following comments on the draft strategy's relationship to the 'big picture' as well some fine-grained comments at the regional and local level, and on the goals and actions, which we hope will be incorporated into the final strategy.

Forest & Bird would like to be heard in support of its feedback.

Part 1 The Strategy

Alignment with other strategies and plans (Page 21)

Forest & Bird strongly supports the explanation of alignment of the draft strategy with legislation, and other national and regional strategies and policies, and the Ashburton District Plan. This section should be placed earlier in the document as it is important context for understanding why biodiversity protection and maintenance is important at the district level, and that it is a statutory responsibility for the district council.

The draft strategy acknowledges the impact of climate change and the role of indigenous biodiversity in adapting to climate change, including the need for nature-based solutions (p19). Nature-based solutions are strongly supported by the Climate Change Commission and they are a key aspect of the National Adaptation Plan and the Emissions Reduction Plan. The National Adaptation Plan and the Emissions Reduction Plan should be included in the list of plans that the strategy seeks to align with.¹

Forest & Bird is pleased to see Te Mana o te Taiao on the alignment list. Te Mana o te Taiao has 2025, 2030 and 2050 goals for protecting and restoring New Zealand's indigenous biodiversity. To achieve these goals and for integration, the district strategy goals should be aligned with the Te Mana o te Taiao goals. This would demonstrate how the local strategy contributes to the achievement of national goals. Furthermore Te Mana o te Taiao is a 'cross-sector' strategy, meaning that it extends beyond land use controlled by the Resource Management Act, and Local and Regional Government, that biodiversity protection and restoration is everyone's responsibility, and it is a tool to guide all stakeholders in practice. Alignment provides an opportunity for the district strategy to articulate this point and for the council to encourage stakeholders to develop their own goals for biodiversity protection and restoration that work toward achieving Te Mana o te Taiao goals.

The Biodiversity Strategy for the Canterbury Region 2008 contain a guiding Priority Principle to *"Focus first on protecting and maintaining what remains, and then on restoring what has been lost"* in the Canterbury Region. This strategy is listed in the alignment list and as a signatory to the regional strategy, the guiding priority principle needs to be clearly articulated in the Ashburton District Council's strategy.

The Ashburton District also has a coastal marine area, so the strategy should also align with the New Zealand Coastal Policy Statement (NZCPS). The NZCPS needs to be included in the list. Given the interconnectedness between land and water, the National Policy Statement for Freshwater (NPSFM) should also be included in the alignment list. Recognising that freshwater management is a Regional

¹ <https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/adapting-to-climate-change/national-adaptation-plan/> and <https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/emissions-reduction-plan/>

Council responsibility, ensuring good outcomes for freshwater relies entirely on appropriate land-use which is the responsibility of the District Council. Integration is vital.

Biosecurity is also an important aspect to ensure that indigenous biodiversity is protected, maintained, and enhanced. This is especially important in a changing climate. Biosecurity New Zealand is currently reviewing the strategy for New Zealand's biosecurity system. At a Regional Level the biosecurity system is generally implemented through the Canterbury Regional Pest Management Plan (CRPMP). Considering that there is a focus on plant and animal pests in the draft strategy, alignment with Aotearoa New Zealand's Biosecurity System Strategy and the CRPMP is also vital.²

Part 2 Our Vision Goals and Action Plan (Page 23)

Forest & Bird is generally supportive of the vision, goals and objectives and the time frame for implementation, reporting and reviewing; however we make the following comments on the goals and on specific actions in the action plan.

Goal 1 PROTECT AND MAINTAIN

1.4 Impacts of development and human activity on significant ecological values are properly managed.

This action is not supported because it is potentially subjective therefore difficult to define. Forest & Bird proposes that this action would be more effective if it was amended to align with 1.3 as follows Further loss of indigenous biodiversity, particularly areas with significant ecological value is prevented, by controlling the impacts of development and human activity.

2.4 Eco-tourism through biodiversity is encouraged and promoted in Ashburton District – while ensuring that impacts are avoided, remedied, or mitigated. For example the impact of a proposed cycle trail between Ashburton River and a wetland reserve, and the issues that arise with large tourist buses at Lake Clearwater.

Goal 4: COOPERATE, ENCOURAGE AND CELEBRATE COMMUNITY PARTICIPATION

4.4 Community projects that aim to protect, maintain, and enhance indigenous biodiversity are supported with adequate grants which are well publicised with straightforward application forms.

Resourcing and Funding (Page 26)

Forest & Bird recommends that ADC staff acquire some expertise that enables them to help with funding applications. To implement this strategy, ADC will require an increased grant fund and more than one Biodiversity Officer. Indigenous biodiversity protection and maintenance is a statutory function of the district council, so we also recommend that the council increase funding to better enable capability and capacity for compliance, monitoring, and enforcement. This is an important link between the strategy and the council's statutory function.

² <https://www.mpi.govt.nz/biosecurity/about-biosecurity-in-new-zealand/a-new-strategy-for-new-zealands-biosecurity-system/> and <https://www.ecan.govt.nz/your-region/plans-strategies-and-bylaws/canterbury-regional-pest-management-plan/>

The Action Plan (Page 28)

Forest & Bird makes the following comments on the actions.

Goal 1: PROTECT AND MAINTAIN

1.1 D. Forest & Bird understands that the Hinds Drain has been singled out for ecological assessment and for recommendations on protecting the values, because work has been completed on the University of Canterbury's Carex project, Fish and Game are/have been surveying biodiversity in the drains, and considerable resourcing has been made available by the Ashburton Zone Committee.

Forest & Bird recommends that a similar approach be adopted for all other water ways throughout the district, particularly naturally occurring water ways, with a priority for the foothills fed and lowland water ways. The NPSFM overarching policy of Te Mana o te Wai prioritises the health and wellbeing of all waterways and where they are degraded, they need to be improved. Councils will need to be closely aligned to ensure that this occurs.

1.4 Amend goal as discussed above. This will help align the strategy with the councils statutory obligation.

1.4 C Ensure existing biodiversity is conserved and enhanced in new subdivisions and development projects. Amend this goal to: Protect and maintain existing indigenous biodiversity and encourage indigenous biodiversity restoration in new subdivisions and development.

Goal 2: RESTORE AND INTERCONNECT FOR THE BENEFIT OF THE COMMUNITY

2.1 C. Investigating the use of MAR (Managed Aquifer Recharge) sites, to improve native vegetation cover in the district is not supported. Reducing pollution and making room for rivers by reinstating natural wetlands and flood plains as a nature-based solution, should be prioritised as an action to restore and connect nature for the benefit of the community.

2.2 C Amend to Support landowners' biodiversity projects that will improve ecological corridors by providing incentives such as rates relief on covenanted areas.

Thank you very much for the opportunity to provide feedback.

Nāku noa, nā

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