

16 April 2021

QEII submission on Ashburton District Council draft LTP 2021-31

We welcome the opportunity to comment on Ashburton District Council's draft Long-Term Plan for 2021-2031. Our comments relate to the opportunity for QEII and the Council to work together for conservation outcomes on private land.

We strongly support the proposed addition of resourcing to increase the Council's capability in biodiversity. We hope to see the establishment of a full-time biodiversity officer like many councils around the country, accompanied by a budget to support landowners and community groups undertaking biodiversity conservation.

1. QEII in Ashburton District

In partnership with private landowners, QEII plays an important role in biodiversity conservation in the Ashburton District. We work alongside private landowners to place covenants on their land to protect areas with open space values, in perpetuity. Our Regional Representative for the area Alice Shanks facilitates our work 'on the ground' through trusted relationships with landowners.

Since Alan Totty's first covenant in Ashburton in 1981, another 20 covenants have been registered, protecting approximately 123 hectares of lowland primary and modified secondary forest, tussock and shrublands, wetlands, and more. There are another 14 hectares of privately owned land currently in the process of registration as QEII covenants, and more areas of indigenous biodiversity in need of protection.

The work we do in partnership with landowners is incredibly important in the Ashburton District. Massive loss of indigenous biodiversity has been sustained over generations, leaving little remaining, much of which is on private land. On the Ashburton Plains in particular these remnants are mere crumbs, frequently no more than a scattering of naturally occurring plants, often acutely threatened, and subject to many ongoing threats such as inadvertent vegetation clearance, intensification, and other land-use change.

Protection of these remnants is critical for the District's natural and cultural heritage. We need to work with landowners to protect the special areas on their land before there is any further loss. History shows that these areas will not survive without a holistic approach to protection, through:

- legal and physical protection
- identification as SNAs
- fostering of landowner interest and pride
- community education
- active management of pest plants and animals.

In parallel with protection of values on private land, we also have three agreements with the Ashburton District Council for protection of high-value vegetation in roadside areas. QEII biennially monitors and reports on the vegetation in the protected area, and the Council has committed to maintaining the area's natural values, primarily through weed control and sensitive management.

We see opportunities for QEII and the council to work together more closely to accelerate the protection of all remaining areas of indigenous biodiversity on private land in the Ashburton District.

2. Prioritising protection of existing biodiversity

Where there are finite resources available for biodiversity, protecting what we have left should be prioritised above establishment of new areas of biodiversity. This aligns with the Canterbury Biodiversity Strategy [2008], signed by the Ashburton District Council. The guiding priority principle of the strategy is to 'focus first on protecting and maintaining what remains, and then on restoring what has been lost'.

It is significantly cheaper to fence and carry out weed and pest control for remnants of naturally occurring vegetation, than it is to undertake planting or wetland reconstruction projects. Protection of existing remnants also results in flora and fauna with significantly higher complexity, representativeness, and sustainability than artificially created or highly manipulated replanting efforts.

When considering investment into biodiversity, focusing first on protecting the biodiversity that remains in the district, before investing in revegetation and other conservation projects, will ensure cost-effective and impactful work.

3. Draft LTP – additional resources for biodiversity

We are encouraged by the proposal to increase resourcing for the Council's capability in biodiversity. Within increasing awareness and interest in conservation, and a growing regulatory role for the Council in biodiversity, more investment into this workstream is needed.

With no DOC office in the District and increasing awareness and interest from community groups and schools to be involved in conservation, our local rep has observed a real need for a full-time biodiversity officer at the Council. This biodiversity officer could provide support and advice to landowners, community groups, and schools wanting to undertake conservation activities, and could advise on biodiversity related planning matters. This role could also work with our QEII rep to together accelerate protection of biodiversity on private land.

The planned increase in biodiversity projects within the Ashburton District by ECAN and DOC is likely to require consultation and input from Ashburton District Council. This work could be managed by a biodiversity officer, reducing the reliance on biodiversity advice from contractors and gradually building in-house knowledge and experience.

When the Selwyn District Council first employed a biodiversity officer four years ago, the position was two days a week. Within a year there was enough work for the role to be full-time. Four years later there are now *two* full-time biodiversity officers at Selwyn District Council. We imagine there would be similar demand for this work in Ashburton District.

We suggest that alongside the addition of a full-time biodiversity officer role, the Council should investigate ways to further support landowners with biodiversity activities. Increasing the community grant pool for biodiversity would undoubtedly accelerate protection and enhancement of indigenous biodiversity on private land in the district, supporting landowners and community groups with things like fencing, pest plant and animal control, and appropriate targeted revegetation.

The likely introduction of an NPS Indigenous Biodiversity later this year will mean an increased regulatory role for the Council. It is our observation that early engagement and support for

landowners, such as would be provided by a biodiversity officer, helps to smooth the transition towards a regulatory framework and build positive relationships with landowners in the district.

4. Other biodiversity related actions

There is a real opportunity for the Council's forestry portfolio to be progressively shifted to indigenous cover carbon sequestration. While we support prioritisation of protecting the remaining native forest over planting new areas, we also strongly support planting natives over exotic trees. Alongside biodiversity benefits, this would generate truly permanent sequestration of carbon to offset the Council's carbon footprint and move away from the negative outcomes of exotic forestry for carbon sequestration.

There is evidence from Christchurch City that hardy indigenous birds such as pīwakawaka (fantails) and riroriro (grey warblers) spend 95% of their time in patches of indigenous restoration plantings, particularly where there are no areas of remnant indigenous biodiversity. Moving from exotic to indigenous planting for carbon sequestration would increase and enhance the habitat for these native birds, allowing them to move beyond private land forest covenants and DOC reserves into new plantings in the district, in turn enhancing the health of those newly establishing ecosystems.

Connecting with wild nature, such as butterflies and birds, is proven to enhance citizens' well-being and connection to an area (*Department of Conservation, 2015 "How nature's ecosystem services contribute to the well-being of New Zealand and New Zealanders"*). Biodiversity projects could be designed to engage the public, such as planting pohuehue species (*Muehlenbeckia complexa, M. australis, M. axillaris, M. ephredroides*) to provide pathways for native butterflies to move from the coastal fringes across the plains and into people's backyards.

Lastly, we wanted to mention our support of how the Ashburton Botanic Gardens has started to showcase local indigenous flora and work on conservation of threatened species through maintaining ex-situ populations. The Botanic Gardens have the required soil and climate to be successful at growing the dryland flora of the Eastern South Island. We suggest that an increased budget and membership of the Botanic Gardens Conservation International (<https://www.bgci.org/>) would provide professional mentoring and focus for this work.

Conclusion

The coming ten years will be critical for biodiversity in the District. We are excited to see that Ashburton District Council is investing in biodiversity and increasing resourcing towards this workstream. We look forward to continuing to work with and grow the collaboration between our two organisations to achieve positive outcomes for biodiversity on private land.