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Ashburton District Council  
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**BY EMAIL:** [submissions@adc.govt.nz](mailto:submissions@adc.govt.nz)

Feedback on Ashburton District Draft Long Term Plan 2021/31

Forest & Bird wishes to be heard.

### **Introduction**

1. Forest & Bird is New Zealand's leading independent conservation organisation. We have played an important role in preserving Aotearoa New Zealand's environment and native species since 1923. We are independently funded by private subscription, donations, and bequests. Our mission is to protect and preserve New Zealand's unique ecological values, flora and fauna, and natural habitats.
2. Forest & Bird has 47 branches throughout Aotearoa New Zealand. Our Ashburton Branch has a long history of conservation in the Ashburton District. Forest & Bird have contributed significantly—and continue to contribute significantly—to conservation in the Canterbury region, as advocates for the environment through national, regional, and local planning processes; through our youth network; as an educator through our Kiwi Conservation Club; and in action through on-the-ground conservation work within our communities.
3. Forest & Bird has for many years had a strong interest and involvement in protecting and restoring nature on land, in freshwater and in the ocean in the Canterbury region. Our strategic vision for Canterbury which ties into our national Forest & Bird strategic objectives is as follows:

**Climate Centred:** Canterbury is resilient to the impacts of climate change. Activities or developments in the region must actively mitigate their contribution to climate change. People understand the threat and urgency of climate change and are supported in climate change practices.

**Economy that Supports Nature:** Canterbury's local economy and nature are interconnected. Unhealthy nature equals an unhealthy economy.

**Vibrant Landscapes:** Canterbury's terrestrial native flora and fauna are protected and enhanced in urban and rural areas. Canterbury's landscapes are free from pests. Development can occur without clearing and destroying landscapes and their respective natural ecosystems.

**Oceans Alive:** Canterbury people recognise the health of the marine environment is a direct result of on-land activities. The regions harbours return to their original, healthy states. Fishing and aquaculture activities follow ecosystem-based management principles. Canterbury's marine environment is protected through a network of no-take marine protected areas.

**Energised Water, Rivers and Wetlands:** Canterbury's groundwater, rivers and streams are clean, healthy and teeming with life. Wetlands are protected and enhanced.

4. Forest & Bird is grateful for the opportunity to provide feedback on the Ashburton District Draft Long Term Plan 2021/31 (LTP). We have done so beginning with some general comments on issues of interest to Forest & Bird then with specific comments on leadership, climate change, freshwater, indigenous biodiversity and biosecurity.
5. The Ashburton Branch of Forest & Bird has submitted separately with a recommendation to Ashburton District Council (ADC) to engage a dedicated in-house Biodiversity officer. This is strongly supported by the national organisation and a position we encourage all New Zealand territorial authorities to establish if they have not already. This submission is supplementary to the branch submission.

### **General Comments**

6. Forest & Bird acknowledges the challenges that a year of COVID has placed on everyone, which will likely be felt for years to come. Forest & Bird generally supports the LTP including the council's Strategic priorities and the key performance indicators.
7. The Ashburton district is fortunate to have braided rivers and freshwater streams, naturally occurring wetlands, high country landscapes and dryland ecosystems, and coastal areas that are world class indigenous biodiversity hot spots. However these natural features are not immune to the impacts of climate change and threats of inappropriate development, pollution, pest plants and animals.
8. These issues can be more efficiently and effectively managed through good governance, planning and management by local government and in co-operation with other agencies and communities.

### **Leadership**

9. Forest & Bird strongly encourage closer co-operation and information sharing between the ADC, neighbouring territorial authorities and Environment Canterbury and other Government agencies on a Climate Change Strategy for the Canterbury region<sup>1</sup>; on Canterbury freshwater issues, including the implementation of the

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<sup>1</sup> We acknowledge that ADC is a member of the Canterbury Climate Change working group.

National Policy Statement for Freshwater Management 2020 (NPS-FM) and Te Mana o Te Wai; on an implementation plan for the Biodiversity Strategy for the Canterbury region and the proposed National Policy Statement for Biodiversity (NPS-IB); on Biosecurity; on environmental compliance, monitoring and enforcement; on a risk assessment of legacy landfills; and on regional transport solutions, to help improve the wellbeing and resilience of Canterbury's communities.

10. Co-operation between local government and other government agencies on these complex issues will achieve greater efficiencies and better environmental outcomes for all rate and taxpayers of Canterbury.<sup>2</sup> We urge the ADC to resource joined up opportunities where possible rather than taking the siloed approach, however we do acknowledge the need to maintain individual district identity.
11. Forest & Bird strongly supports youth engagement. Participation by youth in the School Strikes for climate change suggests that there is a significant opportunity to channel that energy onto charting a more resilient future. We recommend the ADC, as a civic leader, fund and resource programs that promote the engagement of youth in environmental programs and local democracy.

### **Climate Change**

12. Forest & Bird commends the council on adopting a climate change policy. We especially support conserving and enhancing intact ecosystems, such as wetlands, to help lessen the impact of climate change, however this needs to be extended to dryland ecosystems, native forests, freshwater ecosystems and the coastal environment.
13. We recommend that a climate lens be cast across all council activities especially activities that have long term ramifications for nature and for communities, to ensure that the district is on a pathway towards an equitable future for generations to come.
14. We also encourage the council to continue and adequately resource participation in the Canterbury Climate Change working group, to develop a climate strategy for the Ashburton District with its own milestones that sits within the Climate Change Strategy for Canterbury and helps Aotearoa New Zealand achieve its international obligation.

### **Freshwater**

15. Freshwater contamination is a significant issue for all of Canterbury. Water pollution is devastating for nature and for public health. Current freshwater issues will be exacerbated by climate change. Forest & Bird strongly supports ADC's commitment to the government's freshwater reform and the three waters program, especially for improving water use efficiency and for improving ecosystem health of the district's waterways.

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<sup>2</sup> For example here are two such initiatives that we urge the CCC to support & seek participation in [Cr Barbara Gilchrist becomes Timaru's 'biodiversity champion' | Stuff.co.nz](#) and [Biosecurity Advisory Groups | Environment Canterbury \(ecan.govt.nz\)](#)

16. We agree that a good supply of clean and healthy water is necessary for thriving communities and natural ecosystems. We are concerned that the ADC does not appear to have considered the implications, for example, of nitrate contamination in drinking water supplies. We strongly recommend that the ADC ensure there is adequate funding to tackle this issue during the lifetime of this LTP, across the multiple platforms, including any future necessary RMA plan changes.
17. Metering water is a one way to generate income to improve community drinking water infrastructure to communities. Forest & Bird supports the proposal to implement water charges so long as it occurs in an equitable way. We also recommend that the council work closely with Environment Canterbury to recover costs from commercial users of water, to ensure community drinking water sources are kept safe from contamination to better control land use and to improve ecosystem health, faster.

### **Biosecurity and Biodiversity**

18. The Council is required under the Local Government Act to provide for the four well-beings. A notion of balance is implied in achieving this. In our experience councils have favoured economic wellbeing and this has resulted in poor outcomes for environmental, social and cultural well-being. The state of Canterbury's freshwater ecosystems and indigenous biodiversity is living proof of where economic use has prevailed over environmental well-being. This does not suggest balance.
19. Forest & Bird supports the strategic guiding principle of a balanced and sustainable environment however we believe regarding the environment and specifically indigenous biodiversity, the pendulum has a long way to swing back before there is any notion of balance.
20. The council has a statutory obligation to protect outstanding landscapes and significant indigenous biodiversity and to control land-use for the purpose of maintaining indigenous biodiversity. The proposed NPS-IB is likely to be gazetted later this year. The NPS-IB requires territorial authorities to identify and protect Significant Natural Areas (SNA).
21. The Ashburton Branch of Forest & Bird has recommended the council engage the services of a dedicated in-house biodiversity officer. The local experience as set out in the Branch submission provides good justification for this.
22. In addition to employing an in-house biodiversity officer, Forest & Bird urges the council to increase its community biodiversity fund and to properly resource its regulatory portfolio, for planning, compliance, monitoring and enforcement to meet its statutory obligation for indigenous biodiversity.
23. Forest & Bird supports the council's Biodiversity Advisory Group and the continued participation in Environment Canterbury's Biodiversity champions program. We recommend that the council continue to resource participation in these groups to help achieve its own key performance indicators and its statutory obligation for identifying and protecting SNA and for maintaining indigenous biodiversity.

24. Biosecurity is of increasing concern to Forest & Bird, and it is likely to be exacerbated by the impact of climate change. Pest animals, weeds and diseases are a risk to people and to nature. Forest & Bird strongly encourages the council to participate in the Environment Canterbury's Biosecurity Advisory Group for mid Canterbury. Participation in this group enables joined up thinking as well as a more efficient use of scarce resources to manage biosecurity risks, especially for indigenous biodiversity.

### **Waste minimisation**

25. Forest & Bird commends the council on its waste minimisation and recycling program, and we recommend an education program to further minimise waste to landfill and recycling.
26. We also recommend that the ADC allocate funding to urgently assess and understand its risk of legacy landfills in the Ashburton district. The funding must include the removal of the most at-risk landfills vulnerable to sea level rise or extreme storm events, before a Fox River styled clean-up operation is needed.

### **Conclusion**

27. Forest & Bird recommend elevating the climate change policy as an overarching priority in the LTP so council can cast a climate lens over its entire work program.
28. For efficiency and effectiveness, Forest & Bird strongly recommends interagency co-operation on climate and ecological initiatives.
29. We recommend increasing funding for restoring indigenous biodiversity and natural ecosystems and improving biosecurity and to engage the services of a full time inhouse biodiversity officer, to help the council achieve its environmental wellbeing priority and its statutory obligations for indigenous biodiversity.
30. We hope that our suggestions have been helpful and that they will be reflected in the final Long-Term Plan.

Thank you for the opportunity to submit.

Nicky Snoyink  
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Royal Forest & Bird Protection Society of New Zealand Inc.