

Draft Biodiversity Strategy 2023

Summary of feedback

To support hearings 14 December 2023

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Summary of feedback received

Public consultation on the Draft Biodiversity Strategy was undertaken from Wednesday 25 October to Sunday 26 November 2023.

- A total of 60 submissions were received.
- 15 submitters indicated they wanted to be heard on the submission form.

1. Feedback on Vision

Based on the question “Think about what our district, thriving with biodiversity, could look like in 20 years’ time. What do you see?”



1.1 Submitter visions and comments on proposed vision

“Think about what our district, thriving with biodiversity, could look like in 20 years’ time. What do you see?”

Submitter name	Page	Summary	Staff comments
Beach, Ian	61	<ul style="list-style-type: none"> Plenty of green spaces and natives 	
Murphey, Michael David	139	<ul style="list-style-type: none"> Another burden on the rate payers, there’s already much funding going into the Ashburton domain 	
Rupp, Emma	169	<ul style="list-style-type: none"> I see huge Native trees and paddocks filled with native bush. People trapping pests on a daily basis. 	
Anonymous 2	10	<ul style="list-style-type: none"> A balance between production and preserved nature 	
Falconi, Jessica	77	<ul style="list-style-type: none"> The kids grown up, with a sense of conservation for our indigenous species. A responsible Eco-tourism in district that will help to support environmental projects. Community involved in the protection of our indigenous species. 	
Williams, Lisa	193	<ul style="list-style-type: none"> multiple corridors of native planting from the mountains to the sea, for birds and wildlife to access the plains, water supply and in the sea. 	
George, Lyn	98	<ul style="list-style-type: none"> Intensive native green belts in urban zone to bring in birds. Cats will be house cats (not allowed outside without a leash). In 20 yrs time I would like to see kereru, tui etc in urban gardens. 	
Holmes, Wayne	106	<ul style="list-style-type: none"> More native birds and trees in towns. 	
Eason, Ed	73	<ul style="list-style-type: none"> Congratulations on a very well thought out and timely presentation. 	
Wang, Isabel (AYC)	49	<ul style="list-style-type: none"> I see protected endangered species in safe habitats, with the council supporting this action. 	
Murray, Peter	141	<ul style="list-style-type: none"> Significantly more natural areas in the district as a result of greater awareness and value of biodiversity within the community. I imagine the Ashburton District can be a leading example of sustainable biodiversity 	

Submitter name	Page	Summary	Staff comments
		growing in cooperation with productive food production and economic growth, encouraging ecotourism and a better quality of life for residents.	
Widdowson, Christine	189	<ul style="list-style-type: none"> Continued planting in all available areas with natives and bee attracting plants 	
Mackenzie, Sharon	124	<ul style="list-style-type: none"> I see disaster, especially if the government (local and national) are involved. I believe 'biodiversity' will be used to inhibit the community to have access to these areas, it will be used to destroy property rights, farming and our local economy. 	
Aguila, Sophia (AYC)	21	<ul style="list-style-type: none"> I see less endangered species and our species that are unique to New Zealand like birds, plants, marine mammals etc. protected. 	
Summer Foster (AYC)	25	<ul style="list-style-type: none"> I'd like to see less endangered species and less predators. I would also like to see more safe habitat. 	
Groenewald, Leré (AYC)	29	<ul style="list-style-type: none"> In 20 years time I want to see a lot of parks and like outside places for families to hang out with each other. I also want to see more pretty native flowers and trees. Being able to see more flowers and trees would be really nice. I would also like to see less pests everywhere, since they harm the environment. I would also like to see more wildlife around, like birds. I also want to see cleaner rivers and lakes. 	
Woods, Riley (AYC)	57	<ul style="list-style-type: none"> Lots of beautiful flowers everywhere, native plants, no animals (pest), traps 	
Page, Harry (AYC)	37	<ul style="list-style-type: none"> I see good produce and less pests. 	
Wilson, Daus (AYC)	53	<ul style="list-style-type: none"> I would like to see more native bush and more animals and our rivers thriving. 	
Page, Maddie (AYC)	41	<ul style="list-style-type: none"> I would like to see less endangered species and more safe habitats for said species to thrive and grow in. 	
Vannini, Theo (AYC)	45	<ul style="list-style-type: none"> I see reserves where biodiversity is well protected. 	
Lupse, Carina (AYC)	33	<ul style="list-style-type: none"> I would like to see less endangered species and more safe habitats for said species to thrive. 	

Submitter name	Page	Summary	Staff comments
Anonymous 3	12	<ul style="list-style-type: none"> • More interconnected plantings to give birds pathways to travel from hills to the sea 	
Methven Lions Club Inc (McElwain, Mac)	132	<ul style="list-style-type: none"> • The air is rich with the sound of native and songbirds. Birdlife is protected from predation and encouraged with new habitats. Plentiful native flora abound to create birdlife habitats. There's a sense of collaboration between all parties taking the responsibility to achieve this status. All parties acknowledge that landowners and farmers are our friends, not our enemies, just as interested in a thriving environment as the rest of us. 	
Early, Alison	69	<ul style="list-style-type: none"> • I look forward to more native birds moving into urban areas as pockets of their food requirements are developed. 	
McGrath, Maree	128	<ul style="list-style-type: none"> • More wildlife living within towns ed. native bird, reptiles & mammals. Restriction of domestic cat numbers by laws for cat control (same as dogs) at local level. Elimination of introduced species e.g. possums, feral cats, stoats etc. 	
Addison, Kristie	4	<ul style="list-style-type: none"> • I would love to see the return of native birds to urban areas, and more native trees and educational resources in parks. 	
Anonymous 6	18	<ul style="list-style-type: none"> • Pest and weed eradication, this will then help with reviving biodiversity. 	
MHV Water (Brooks, Melanie)	134	<ul style="list-style-type: none"> • I see road corridors planted with tussocks and flax, I see ki uta ki tai native corridors (also utilising road reserves plus private land for the trees) 	
Alford Landcare (Totty, Alan)	6	<ul style="list-style-type: none"> • There will be more native plantings in the district mostly done by dairy farmers wanting to meet market requirements and provide a better image to the travelling public. More small pockets of biodiversity will be restored by community or council led groups such as Wakanui Beach and Staveley Campsite Bush. On the plains and in the foothills the isolated remnants will continue to disappear. In the last 30 years many of the roadside plants on the plains and solitary Beech trees on foothills farms have gone, not necessarily by any malign intent but through natural processes. Private individuals will through a personal commitment to the environment. continue to protect and enhance biodiversity on their properties especially those with QE2 covenants. 	

Submitter name	Page	Summary	Staff comments
Hawkes, Murray	104	<ul style="list-style-type: none"> I see council managed areas with poor biodiversity because of lack of commitment to ensuring maintenance of water resources dispersed over the plains. I see improved biodiversity on private farmland despite council efforts. 	
Wall, Kim	183	<ul style="list-style-type: none"> If we start educating our young learners now in 20 years time not only will the community be thriving with biodiverse spaces but we could also have adults full of knowledge, passion and also qualifications that will continue to encourage positive biodiversity growth in the Mid Canterbury area. Our local and community spaces in 20 years could again be full of bird life, a habitat for many insects and also a place for the community to enjoy and learn from. 	
Lake Clearwater Hutholders (Keen, Maureen)	116	<ul style="list-style-type: none"> Clean waterways- wetland corridors connecting coastal and inland sites, enhanced, healthy swamps, places for native fish and eels, healthy shellfish in our lakes, more native birdlife particularly wetland birds like bittern, crested grebe, spotless crake, corridors of native trees and shrubs which provide food and habitat for native birds, insects and reptiles. Rabbits, cats, hedgehogs, possums, mustelids, rats, and browsing animals like deer, goats, wallaby gone. Rare ecosystems are protected and the communities that live and spend recreational time in our places show respect and value the environment and the biodiversity. A protected dark sky in the Lake Clearwater area so that all can come and see the spectacular night sky. 	
Forest & Bird (Clemens, Val)	91	<ul style="list-style-type: none"> A community that recognises and values native species and natural areas. Where learning about local ecosystems becomes a natural part of school programmes, where any remaining native plants on the plains, particularly, are valued and protected. That we increase the area of native planting on the plains from the current figure of 0.5%. A district that protects vulnerable wetlands, braided rivers and high-country lakes from vehicle damage, and the impact of agricultural development. 	
Rob	167	<ul style="list-style-type: none"> Dry barren lands and lack of water in rivers over the summer months due to irrigation. 	
Staveley Camp Forest (De Spa, Gen)	174	<ul style="list-style-type: none"> Native birds as the most obvious ecological indicator of good healthy thriving native habitats. We would have a much higher number of native 	

Submitter name	Page	Summary	Staff comments
		<p>birds and a much greater variety of species over a much greater area because the food sources and habitat for them would have grown in area and would be flourishing. Podocarps would be returned to the landscapes they formerly inhabited, providing enormous food sources for many native birds. We would see and hear tui, kereru, korimako, piwakawaka, riroriro, kingfisher, tomtit, rifleman, ruru, karearea, kahu, kakariki, white faced heron, and higher up, kea regularly and often. Seeing and hearing native frogs, lizards and insects would be another indicator of healthy, functioning native ecosystems. This would be most likely to be achieved by having 'islands' of decent sized (1-3ha minimum) bush blocks (with all layers from emergent and canopy to shrub and floor layers) wetland and dryland areas in 'stepping stone' formation within 2km radius' of each other, making a mosaic of native habitat from the mountains to the sea.</p>	
Harrison, Graeme	102	<ul style="list-style-type: none"> • The key outcome of the 2023 draft Ashburton Biosecurity strategy was recognition that people respond best to change when they are involved in decision making. The failed central government (2017-23) directive approach of virtue signalling was abandoned and a fruitful dialogue commenced with practical environmentalists, putting result goals before ideology. ADC recognised the region's economy depended on the environment and the region's ability to care for the environment depended on the success of the economy. • Learnings from the QEII Trust collaborative model became the key means of communicating with landowners particularly in the Foothills and High Country to secure a tenfold increase in covenanted privately held indigenous diversity areas. Exponential growth in lowland native vegetation plantings and resultant habitat corridors came from engagement with irrigation company shareholders and other landowners. Ongoing scientific and evidence-based findings facilitated land management changes and resulted in the regions becoming a beacon for biodiversity practices in New Zealand. • Mutual respect and education were core strengths of the collaboration model. ADC initially assisted this by appointing a Council Ecologist and Biodiversity Adviser and added personnel expertise over the years, 	

Submitter name	Page	Summary	Staff comments
		including issuing biodiversity credits as incentives to supportive landowners rather than direct financial support.	
Seddon, Clive	172	<ul style="list-style-type: none"> In 20 years with current methods, I can see almost total eradication of most insects, insect eating birds and wild animals, with the use of poisons that kill most species. If any poison plan is put in place or used, the plan must only kill the target species and no other. With current methods most insects, insect food dependents, birds that feed on poisoned carcasses, animals that feed on poisoned carcasses, non target animals, have already been killed. I have witnessed the demise of widespread large populations of insects and dependents in the Ashburton Back Country. A plan needs put in place to stop this happening. Time has come to stop ignoring that this is happening. 	
Mid Canterbury Catchment Collective (Leferink, Willy)	136	<ul style="list-style-type: none"> Properly recorded and protected biodiversity what we have left without stifling local opportunities by draconian rules. A lot more desired native plantings, in a coordinated way so we create the corridors from mountains to the sea. When we have created these corridors the other species will likely return by itself. Make biodiversity accessible and interesting for bigger groups in the community, particularly schools, by involving them in planning, planting and maintenance. That the people of the Ashburton District are proud of what they have achieved in the last 20 years. 	
Cushnie, Angela	67	<ul style="list-style-type: none"> Communities, agencies, NGO's, schools and rununga etc working together to sustainably protect and regenerate, focusing on ecosystem servicing and enhancing what we have already eg acknowledging gum trees (for example and other early flowering plants provide food for bees and other insects on the shoulder of the season. Ashton Beach is an example of a failed outcome for biodiversity when an agency is not onboard :(

Submitter name	Page	Summary	Staff comments
Poff, Jono	147	<ul style="list-style-type: none"> • Rewilding and native planting of council land and easements. • Wetlands recreated to mitigate flooding and filter surface runoff. • Islands of habitat for native species with control of introduced predators. • Shelter belts and other strips merged to create wildlife corridors, linking habitat islands. 	
Cleardale Station (Field, Donna)	63	<ul style="list-style-type: none"> • The existing biodiversity we have has been protected and allowed to expand. The high country and foothills retains its unique grey scrub communities and indigenous vegetation, not exotic forestry. Corridors and patches of indigenous biodiversity especially along rivers allow for species interconnectedness and travel. Native birds, insects and invertebrates are thriving. 	
Gibbs, Chris	100	<ul style="list-style-type: none"> • Biodiversity corridors from the mountain to the sea, preferably running along the waterways where traditionally weeds have dominated. Not necessarily eco-sourced or all native trees, but a mix that will provide a food source for native birds and insects as well as other beneficial species. • These corridors could have walking/biking tracks along them that public could use if area allows for this. Be mindful that these waterways need (or may need) to be maintained in the future so machinery access needs to be considered. • Landowners where existing native biodiversity exists are encouraged to protect these areas, but not have heavy restrictions on surrounding land use, bearing in mind that land use changes over the years. • Incorporate surface water management in this plan to better handle the larger rainfall events we've been experiencing i.e. allow enough capacity in the waterway/swale to capture & handle big flows. Don't overplant these areas. 	
Everest, Phillip	75	<ul style="list-style-type: none"> • Our district already has good biodiversity in many areas already - there is room for further enhancement. Existing Native bush is preserved BUT able to be accessed and enjoyed by all. From native plantings now and in the future on many farms this will be enhanced. The river corridors could easily be native corridors from the mountains to the sea 	

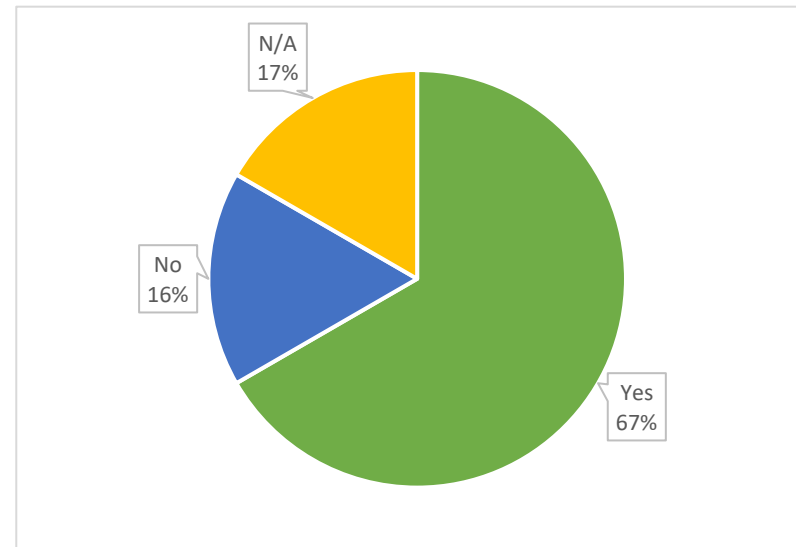
Submitter name	Page	Summary	Staff comments
Fish and Game (Dellaway, Nicola)	89	<ul style="list-style-type: none"> Abundance of native flora and fauna interacting with valued introduced species. Native bush restored where applicable and well-established native plantings in parks and open spaces. Wildlife corridors well established. In 20 years' time pest mammals will be well under control in most key breeding sites for NZ native birds. Increased/restored wetland habitat for waterfowl and ongoing pest plant and predator maintenance. Ō Tū Wharekai will be a thriving ecosystem with clean lakes, abundance of kākahi and NZ native fish interacting with valued introduced species such as sports fish. The surrounding land is farmed within its means. Co-operation and collaboration among stakeholders is at a high 	
Mabon, Richard	119	<ul style="list-style-type: none"> I see a community-led project, driven by people who understand and support the intrinsic values of healthy and thriving biodiversity. The Vision statement suffers for being expressed in a "passive voice". I'd rephrase it "A district of communities that values, cares, protects and enhances biodiversity from the mountains to the sea (ki uta ki tai). I see Council's role as being an enabler of community action, an effective regulator that ensures its District Plan upholds the NPS - IB and one of a range of funders. 	
QEII National Trust (Lindsay, Kate)	161	<ul style="list-style-type: none"> QEII strongly supports the proposed vision for the strategy. This vision aligns with the Biodiversity Strategy for the Canterbury Region, which has the guiding priority principle "focus first on protecting and maintaining what remains, and then on restoring what has been lost", and was signed by the Ashburton District Council in 2008. It also aligns with the key objective of the National Policy Statement for Indigenous Biodiversity (NPSIB) of maintenance and no further loss of indigenous biodiversity. 	
Staveley Camp Forest (Palmer, Karen)	177	<ul style="list-style-type: none"> I'd love to see Staveley Camp Forest protected as a Remnant Native Forest. I'd like to see the return of Kakariki Parrots to this area, or a breeding and release program established. River Awa area planted with native regenerative areas. 	

Submitter name	Page	Summary	Staff comments
Perkins, Marion	143	<ul style="list-style-type: none"> • Thriving biodiversity is being strangled by too much building. And land covered with tar-seal. Not much left to see in 20 years' time. 	
KANUKA MID CANTERBURY REGENERATION TRUST (Rushton, Claire)	112	<ul style="list-style-type: none"> • A thriving local economy, with a community that values, appreciates and protects the natural environment. The Trust would urge that the community, particularly any impact of the Strategy's goals and objectives on the community, is put at the forefront of ADC's consideration when giving effect to the Strategy's vision. • Kanuka Trust's own vision for our Trust is 'linking our land and water, cultures and community', as this vision encompasses the philosophy that everything is linked. We believe that environmental and economic sustainability directly impacts social and cultural sustainability, particularly in terms of the mental, physical and spiritual wellbeing of families and communities. 	

2. Goals and objectives

Based on the question “Do the goals and objectives of the strategy capture what you see as the key issues facing biodiversity in the district?”

	Number of people
Yes	40
No	10
N/A	10
Total	60



Sixty-seven per cent (67%) of the respondents agreed that the goals and objectives in the draft strategy captured the key issues facing the biodiversity in the district and 16% of the respondents disagreed, stating the key issues were *not* captured within the goals and visions.

2.1 Comments on the goals and objectives as key issues facing biodiversity in the district:

Submitter name	Page	Summary	Staff comments
Yes, goals and objectives are capturing key issues			
Rupp, Emma	169	<ul style="list-style-type: none"> I think Ashburton would do so much better with maintenance and protection that the strategy provides. Especially with a 20 year lifespan. 	
Anonymous 2	10	<ul style="list-style-type: none"> The authorities representing the district are efficiently protecting the ecosystem in the area. 	
Falconi, Jessica	77	<ul style="list-style-type: none"> The 4 goals that the strategy has, are very important for the future of our biodiversity. We can't protect without education, and to know what is really happening to our indigenous species we need to do research. To restore the environment we need the community to be involved, to participate. The cooperation of the stakeholders is crucial in this strategy. 	
George, Lyn	98	<ul style="list-style-type: none"> It's a start 	
Wang, Isabel (AYC)	49	<ul style="list-style-type: none"> I think the strategy targets the key issues facing biodiversity. 	
Murray, Peter	141	<ul style="list-style-type: none"> The goals of the strategy are good and with community ownership and participation, the objectives are achievable and will greatly benefit the district. 	
Aguila, Sophia / Foster, Summer / Page, Harry & Maddie / Wilson, Daus / Woods, Riley (AYC)	21-57	<ul style="list-style-type: none"> We believe that the council has outlined the main goals and we should focus on heading into the future. 	
Vannini, Theo (AYC)	45	<ul style="list-style-type: none"> The main issue that I see is the loss of biodiversity which these goals cover well. 	
Methven Lions Club Inc (McElwain, Mac)	132	<ul style="list-style-type: none"> I get a real sense of a desire for collaboration for a set of common goals. I see less of a set of unrealistic regulations imposed on folk by an over-bearing bureaucracy. I sense that we understand that success will occur with collaboration rather than dictates. I sense that the ADC sees its role as leadership not imposition. 	
McGrath, Maree	128	<ul style="list-style-type: none"> Schools, especially primary, should be encouraged more in planting indigenous vegetation. 	

Submitter name	Page	Summary	Staff comments
Early, Alison	69	<ul style="list-style-type: none"> I feel reasonable steps are being taken - attainable rather than over-the-top pipe dreams. 	
Wall, Kim	183	<ul style="list-style-type: none"> Yes, the main goal I would like to see action on is Goal 3 - educate and enhance awareness. Many people don't know or have access to the current state of biodiversity in the district and the importance of sharing information and positive messages about biodiversity needs to start at a young age. Often adults have lost interest/formed negative habits BUT can be inspired by their children/grandchildren to be aware of the environment, biodiversity benefits and their impact locally and globally. 	
Lake Clearwater Hutholders (Keen, Maureen)	116	<ul style="list-style-type: none"> It is good to see the encouragement of ownership and funding so that groups can feel that they are part of the enhancement of the Mid Canterbury Biodiversity. 	
Forest & Birds (Clemens, Val)	91	<ul style="list-style-type: none"> The objectives are necessarily broad and it will be the details in taking actions to fulfil them that will need to be carefully considered. In this realm, the education and awareness of decision makers becomes critical. Working with other NGOs in this area, eg ECAN, and with volunteer groups is covered to a degree within ADBAG but the increasing formality of recent meetings does not encourage discussion and cooperation as was evident in earlier meetings. The meetings could be held more often. Increasing the number of staff working on biodiversity would be helpful. Selwyn District Council has 3 biodiversity officers. 	<p>The ADBAG meeting frequency is not considered in this strategy but would be recommended to the group in their next Term of Reference review.</p>
Staveley Camp Forest (De Spa, Gen)	174	<ul style="list-style-type: none"> Yes, however the implementation of these objectives will be the hard part. While many of the actions are quite good, they are still not very specific and some of the timeframes seem dubious – for example collating information on sites of cultural heritage values and sharing mahika kai concept and knowledge, both in the medium term, when this has already been part of the district and regional council agenda for the past 15 years through the CWMS and Zone Committee process. Surely this information is at our fingertips to start sharing immediately. So I have some doubts about the drive to get the goals and objectives implemented. 	<p>Comments noted. The time frame for this specific objective is set to enable both parties develop a work program which we currently do not have. We will continue to engage with Rūnaka. Council to consider making it “short-term” timeframe if it is deemed fit to the Rūnaka. Also, the strategy is intended to be regularly reviewed which will assist</p>

Submitter name	Page	Summary	Staff comments
			in setting more specific timeframes as work progresses.
Cushnie, Angela	67	<ul style="list-style-type: none"> Perhaps a stronger emphasis on engagement and education but otherwise everything appears to be captured. We cannot protect what we do not understand and something similar to the Kanuka Trust Biodiversity 101 video storytelling approach (a more professional version) would be a valuable resource. 	
Everest, Phillip	75	<ul style="list-style-type: none"> our Community does value and care as can be seen by the native plantings, stream enhancements through planting, change in habitat and the benefits of Managed Aquifer recharge. Catchment groups throughout the district will coordinate actions throughout the district. 	
Fish and Game (Dellaway, Nicola)	89	<ul style="list-style-type: none"> Yes, however, I would like to see inclusion of “valued introduced species” in the biodiversity values as these do not come under either of the two categories commonly mentioned in the strategy i.e. Indigenous or taoka species as identified by mana whenua. 	The protection of non-native species was explained on page 9 of the draft strategy, especially where they serve as a buffer for ecological corridors or where removing the non-native species from the ecosystem would disrupt the ecological functions (food web structure).
QEII National Trust (Lindsay, Kate)	161	<ul style="list-style-type: none"> Goal 1: QEII strongly supports this goal, but we think it could be strengthened with the inclusion of “no further loss of indigenous biodiversity” to recognise the significance of the remaining biodiversity in the district and to prevent wholesale loss of biodiversity on the Plains. 	No further loss of indigenous biodiversity and actions to prevent additional loss of biodiversity have been acknowledged and captured in objective 1.3 of the draft strategy.
KANUKA MID CANTERBURY REGENERATION TRUST (Rushton, Claire)	112	<ul style="list-style-type: none"> The strategy’s objectives and goals are thorough and reflect ambitious, yet necessary targets for the community to achieve in order to support biodiversity. We consider goals 3 and 4 (education and collaboration) to be critical to the success of this Strategy. This is because goals 1 and 2 (relating to protecting 	

Submitter name	Page	Summary	Staff comments
		<p>and restoring biodiversity) can only be successfully achieved if ADC and its stakeholders can get 'buy-in' and work with all areas of the community.</p> <ul style="list-style-type: none"> We believe there should be a real focus on prioritising the education aspect of the strategy goals and actions (educating the next generation). 	
No, goals and objectives are not capturing key issues			
Harrison, Graeme	102	<ul style="list-style-type: none"> Too much virtue signalling and weak attention to engaging with the key enablers to increasing the district's biodiversity - landowners! 	
Alford Landcare Group (Totty, Alan)	6	<ul style="list-style-type: none"> The goals and objectives are all nice sounding words and well-meaning intentions. We don't support objectives such as 'knowledge of Manawhenua world view' whatever that means. The multicultural people of Ashburton District have had 160 years of experience of living and working in the district to refer to when planning for the future of our district. 	
Mackenzie, Sharon	124	<ul style="list-style-type: none"> If the goal is to destroy economic growth, freedom, access and food production. 	
Hawkes, Murray	104	<ul style="list-style-type: none"> The strategy ignores the importance of water races and micro wetlands associated with them as essential elements in aquatic and avian resources 	<p>Biodiversity within water races and wetlands is part of the proposed actions (2.1.C) in establishing ecological corridors within the district. How the water races are managed was not considered in this strategy but is contained in the Council Surface Water Strategy 2018. Additionally, all aspects of wetlands are managed under ECan's Land Water Rules.</p>

Submitter name	Page	Summary	Staff comments
Mid Canterbury Catchment Collective (Leferink, Willy)	136	<ul style="list-style-type: none"> • In general the draft strategy is well written with plenty of detail, but we feel there is too much emphasis on the past. The collection of even more data on flora and fauna and cultural sites is not enhancing our biodiversity. • We also feel that we cannot help or protect native flora and fauna from climate change in a meaningful way and these energies and resources are better spend somewhere else on developing more diverse native flora and fauna. • We are sympathetic with your idea to encourage biodiversity as a subject in the education system at all levels. Remove barriers to be involved, particularly schools at all levels, by involving them in planning, planting and maintenance. 	
Poff, Jono	147	<ul style="list-style-type: none"> • Goal 1 takes too narrow a view of what is 'significant' and gives too much attention to rare, threatened and taoka species, over a broader ecological context. It's not that these species aren't important, but the pressure on them is cumulative and interlinked and needs to be addressed at a greater scope. • With regards to high country land development, consents granted for development of original landscapes with native vegetation ought to be publicly notified, with transparency around the reasoning behind any granting of such consents. • Future development ought to be discouraged and all original landscapes ought to be treated as having significant natural value. • Consents for exotic forestry should be notified and require environmental impact reports. 	<p>Staff proposes to delete “threatened and at-risk” from objective 1.3 to reflect submitters concern.</p> <p>Every consent application is considered on its own merits, taking into account the RMA provisions and National legislations such as the NPS – IB. It is however difficult to apply a blanket notification requirement. Consent decisions, including those on notification are required to provide robust justifications as these are challengeable.</p>
Cleardale Station, (Field, Donna)	63	<ul style="list-style-type: none"> • Overall I support the goals and objectives, particularly protect and maintain however they feel somewhat light. 	Protection and maintenance of existing biodiversity remnants are the focus of our first goal to reflect

Submitter name	Page	Summary	Staff comments
		<ul style="list-style-type: none"> • In 2008 ADC signed the Biodiversity Strategy for the Canterbury region. The guiding principle for this "focus first on protecting and maintaining what remains, and then on restoring what has been lost", needs to be kept as a priority. • One of the biggest issues is there is little budget for compliance and monitoring of existing rules such as vegetation clearance. This needs to be part of the objectives. • The majority of the Ashburton district has less than 10% of its indigenous habitat remaining. All that is here needs to be protected, not just that which human deem significant. It reads that development and human activity takes priority over ecological values and that we can manage loss of biodiversity through compensation and off setting. I am concerned that there may be an acceptance that it is OK to remove remaining biodiversity and offset by plantings. Weeds (particularly ecological weeds) and clearance are our biggest threats to biodiversity. 	<p>Regional and Central government biodiversity emphasis.</p> <p>Compliance and monitoring are currently part of Council operational process for consenting. Also, biodiversity compensation and offsetting are part of effect management hierarchy in consenting process and were not mentioned or considered in any section of the draft strategy.</p>
Gibbs, Chris	100	<ul style="list-style-type: none"> • Mostly. Before areas are identified as 'protected' consultation with the landowner/occupier needs to occur as to why that area is protected especially if it is not obvious. • An explanation of what restrictions of land use for the identified 'protected areas' and surrounding land would be good to make sure these restrictions, particularly on the surrounding land, are practical. Allow catchment groups and community groups to drive projects and councils only help out with advice, funding and rule navigation. Too many rules are restricting progress and often put projects in the 'too hard' basket. 	
Mabon, Richard	119	<ul style="list-style-type: none"> • Many of the goals and objectives of the strategy capture the key issues, but some miss the mark. I understand that where multiple parties are listed under "Who", the first named is the lead agency. I argue that some leads should change in my comments below. I would also argue that the Biodiversity Strategy should clearly state that the first named organisation is the lead agency. • Amend Goal 2 to read "Restore and interconnect to enhance indigenous biodiversity". While the community will benefit, we don't do it for the benefit of the community, but for the benefit of the environment and ecology of our place. 	<p>Comments noted. Staff support Council considering adding clarification of 'lead' in Who column to the strategy.</p>

Submitter name	Page	Summary	Staff comments
		<ul style="list-style-type: none"> Amend Goal 4 to read "Community groups, Runaka, landowners, private sector and public sector groups work together to conserve and enhance indigenous biodiversity". We need to do more than encourage, and in fact we are already doing more than encourage this goal. 	
Perkins, Marion	143	<ul style="list-style-type: none"> Biodiversity is not confined to lakes, waterways and rural districts. My own garden is a habitat for many species. Domestic cats have killed most of the fledgelings birds. Very distressing! 	Currently there is no national regulation/policy on cat control in New Zealand. This could be considered by way of a bylaw which some Councils have introduced (e.g. Whangarei and Selwyn DC).
SAVE THE RIVERS MID-CANTERBURY (Ackerley, Geoff)	171	<ul style="list-style-type: none"> We cannot see how there can be agreement on a plan that does not identify and provide for the outstanding recreational opportunities that our local waterways have, in particular with respect to our trout and salmon fisheries. Other issues that either are missing or lacking in emphasis relate to restoring the Ashburton river to the showpiece that it should be, addressing water quality and quantity issues that have been neglected, ensuring recreational access to our waterways (in particular at river mouths), and the costly delayed action with respect to the Ashburton lakes. We believe that ADC's record with respect to values our waterways provide, the fresh water fishery and its lack of action over environmental issues has been seriously lacking; any approach that improves this would be positive. 	Ashburton River management including water quality issues and resources are domiciled within the Environment Canterbury function. However, we proposed in this strategy to establish ecological corridors using our three river channels in collaboration with the Environment Canterbury, Runaka, Department of Conservation and other stakeholders.

3. Strategy objectives - priorities

Based on the question “**What do you see as the top five priorities from the objectives mentioned in the strategy?**”

51 submitters provided their top five priorities, leading to the following objectives with the highest priorities:

TOP 5 objectives:

- | | |
|---|----------------|
| 1. Sustain and improve school environmental programmes (3.4) | 56.86% (29/51) |
| 2. Prevent further loss of threatened indigenous species via pest control (1.3) | 50.98% (26/51) |
| 3. Support projects that aim to restore and interconnect indigenous biodiversity sites (2.3) | 50.98% (26/51) |
| 4. Interconnect biodiversity sites and threatened species habitats (2.2) | 45.10% (23/51) |
| 5. Encourage the public to participate in conservation and celebration of biodiversity (4.3) | 39.22% (20/51) |

ANSWER CHOICES	RESPONSES
▼ Sustain and improve school environmental programmes	56.86%
▼ Prevent further loss of threatened indigenous species via pest control	50.98%
▼ Support projects that aim to restore and interconnect indigenous biodiversity sites	50.98%
▼ Interconnect biodiversity sites and threatened species habitats	45.10%
▼ Encourage the public to participate in conservation and celebration of biodiversity	39.22%
▼ Identify and protect taoka (taonga) species and their habitat	37.25%
▼ Increase indigenous vegetation cover	37.25%
▼ Support community projects that protect and maintain indigenous biodiversity	37.25%
▼ Encourage cooperation and collaboration among stakeholders	35.29%
▼ Council to take a leadership role in working together and encouraging conservation and enhancement	29.41%
▼ Properly manage human activity on biodiversity	27.45%
▼ Share knowledge on indigenous biodiversity with the community	23.53%
▼ Research and collect data on the state of biodiversity	19.61%
▼ Encourage ecotourism	17.65%
▼ Identify and protect ecological values	15.69%
▼ Document and share knowledge of Manawhenua on biodiversity	5.88%
Total Respondents: 51	

3.1 Comments on the priority of the objectives in the strategy:

Submitter name	Page	Summary	Staff comments
Other			
Anonymous 2	10	<ul style="list-style-type: none"> Support pest management approach with other stakeholders to control plant and animal pests. 	
Mackenzie, Sharon	124	<ul style="list-style-type: none"> The council cannot even build a new council building within budget - 10 million over budget; 30 km zones everywhere; cones and poorly constructed roads. Our council should be given limited power and have nothing to do with 'biodiversity'. 	
Williams, Lisa	193	<ul style="list-style-type: none"> Publish the different programme and methods in which large landowners can access plants and assistance for planting to encourage 'buy in' to the idea or biodiversity and native habitats by landowners 	<p>We currently provide assistance to landowners when needed.</p> <p>However, access to plants is funded through biodiversity grant.</p>
Murray, Peter	141	<ul style="list-style-type: none"> Include a requirement of equivalent or proportional development of biodiverse land with every new development and building. For example, requiring new builds to contribute towards an area of native planting equivalent to new building's footprint. 	<p>Provisions in the NPS IB require standards of indigenous vegetation improvement including in urban areas. ADC is awaiting the lead of ECan on this matter. This will be part of the development of their RPS and Regional Biodiversity Strategy. We will then have to give effect to these documents.</p>
Mabon, Richard	119	<ul style="list-style-type: none"> When asked to choose five objectives, my choices were guided by the observation that some of the objectives seemed repetitive or a sub-set of others. As a result I tended to favour objectives which were broader and more inclusive. For example, "Share knowledge on indigenous biodiversity" must include Manawhenua knowledge on that topic. 	

4. Feedback on the Action plan: general and per Goal (1,2,3 and 4)

We have identified 55 actions to reach the goals in the strategy (see the Action Plan on pages 28 - 35 of the draft strategy).

Based on the question “**Is there any specific action or anything else Council should be doing to support biodiversity in the district?**”

Submitter name	Page	Summary	Staff comments
General			
Wall, Kim	183	<ul style="list-style-type: none"> This action plan is well thought out and clear to see objectives, actions, who is responsible etc. 	
Verney, Melissa	181	<ul style="list-style-type: none"> Council should do more and faster. Action should be taken now and not later. 	
Vannini, Theo (AYC)	45	<ul style="list-style-type: none"> I think that the way to go is large nature reserves that protect biodiversity. 	
Staveley Camp Forest (De Spa, Gen)	174	<ul style="list-style-type: none"> Staveley Camp is a publicly accessible community asset with a huge local history and is in desperate need of community engagement if it is to survive as a native remnant. Proposal to get adopted by Council to lead the way with the strategy by sending all council staff on practical experience & education the Council could achieve all strategy goals at once and the Staveley Camp and Forest could become the Council's Biodiversity Learning Centre. 	Council to consider these points during the deliberation.
Cushnie, Angela	67	<ul style="list-style-type: none"> Context and balance are important. We need to acknowledge the modification and changes that have impacted biodiversity over a long period of time. Some change/evolution has occurred naturally and some has been man made as we developed our towns and cities, parks and reserves, farmland and infrastructure. Our strategy needs to be ambitious yet achievable according to what current and future generations deem affordable and can sustain. It is important we work with nature while protecting our livelihoods and infrastructure - thriving biodiversity and a prosperous society. 	Council to consider these points during the deliberation.

Submitter name	Page	Summary	Staff comments
Mabon, Richard	119	<ul style="list-style-type: none"> I strongly endorse the submission of the QEII Covenant Trust and commend you to take on board their practical experience and sense of urgency. No effort has been made to define "ecological values". More effective action on pest control, whether it be fauna or flora. In domestic environments, the need for greater control of domestic cats is raised. Replicating the Dog Control Act for cats is a step too far for me at this time but protection of native birds and the return of birdsong to urban neighbourhoods is a recurring theme. The disclaimer about water-related biodiversity is something of an excuse for a glaring gap in an otherwise very good document. The existence of the Canterbury LWRP has not stopped Council developing and adopting other documents that highlight the ecological values of waterways - including the Surface Water Strategy and the Water Races Bylaw. Nor does the existence of other regulation prevent Council from taking or enabling non-regulatory measures. 	<p>Staff proposes to add ecological values definition to glossary list in the next version of the strategy.</p> <p>Currently there is no national regulation/policy on cat control in New Zealand. This could be considered by way of a bylaw which some Councils have introduced (e.g. Whangarei and Selwyn DC).</p> <p>Council to consider other suggestion during deliberation.</p>
Wang, Isabel / Aguila, Sophia / Foster, Summer / Groenewald, Leré / Page, Maddie / Lupse, Carina (AYC)	21-57	<ul style="list-style-type: none"> We believe that council has highlighted all the right actions to support biodiversity in the district, nothing to add. 	
GOAL 1			
Methven Lions Club Inc (McElwain, Mac)	132	<ul style="list-style-type: none"> Action 1.3/B regarding pest control in council reserves should be ST not LT Action 1.3/D regarding wilding pines should be ST not LT. Get them gone before they cone and get completely out of control. 	Pest control in council reserves is currently ongoing (O) and will continue throughout the life span of the strategy.
Poff, Jono	147	<ul style="list-style-type: none"> More attention should be given to weed control and regeneration of native species in braided riverbeds. The council should participate in biocontrol 	

Submitter name	Page	Summary	Staff comments
		<p>trials for noxious weeds like old man's beard, and use these methods if indicated.</p> <ul style="list-style-type: none"> • There needs to be a more flexible approach to collection and discharge of surface floodwater (ie, exceptional flows) into rivers, and a program of swale and wetland development to capture silt and pollutants. This implies explicit coordination with the Canterbury Land and Water Regional Plan. • Spraying of the banks of races is done with chemicals that are highly toxic to freshwater species. Needs to be an education campaign to discourage this, and to encourage vegetation that provides shade and habitat. Some research into ways to combine this approach with ditch cleaning may be required. 	
McGrath, Maree	128	<ul style="list-style-type: none"> • 1.1. Perhaps could include an action for initial control of domestic cats to be same as for dogs (registration). This could be a long term plan that needs to be commenced now! Further action would be: 1) Kept inside at night 2) Limited number of cats per household 3) Required to not leave property 	Currently there is no national regulation/policy on cat control in New Zealand. This could be considered by way of a bylaw which some Councils have introduced (e.g. Whangarei and Selwyn DC
Holmes, Wayne	106	<ul style="list-style-type: none"> • Feral and domestic cat control/management. One of the biggest issues regarding native birds in residential areas is cats. I think it would be good to introduce some rules regarding registration of cats and more control of them so they can't be roaming so much. Maybe live capture traps in reserve areas with fees to get the cat back? 	Currently there is no national regulation/policy on cat control in New Zealand. This could be considered by way of a bylaw which some Councils have introduced (e.g. Whangarei and Selwyn DC
Forest & Bird (Snoyink, Nikky / Smith, Edith)	94	<ul style="list-style-type: none"> • 1.1 D. Forest & Bird understands that the Hinds Drain has been singled out for ecological assessment 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. • 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. 	<p>Hinds drain is a unique wetland area in the district, and we will review all reports to date to establish knowledge gap and advice the Council on what needs to be done further.</p> <p>Council to consider these points during the deliberation.</p>

Submitter name	Page	Summary	Staff comments
		<ul style="list-style-type: none"> 1.4 This action is not supported because it is potentially subjective therefore difficult to define. We propose to align with 1.3 as follows: <i>Further loss of indigenous biodiversity, particularly areas with significant ecological value is prevented, by controlling the impacts of development and human activity.</i> 1.4 C: Amend this goal to: <i>Protect and maintain existing indigenous biodiversity and encourage indigenous biodiversity restoration in new subdivisions and development.</i> 	
Ralston, Mary	165	<ul style="list-style-type: none"> 1.1 D The Hinds Drains are the only specific place mentioned and this area is already well surveyed by the Water Zone Committee. There are many other important biodiversity areas such as wetlands, foothills water races and streams, coastal dongas and hapu that are more worthy of survey. 1.4 Impact of use and development: I support reviewing and strengthening the vegetation clearance rules in the District Plan, and proper resourcing so that rules can be enforced. Much native vegetation has been sprayed in the hill and high country without consequence. The remaining matagouri and “grey scrub” is all valuable and should not be removed to allow farm development. 	Vegetation clearance rules will be considered in the next District Plan review or as part of the Regional Planning Framework under NBE Act (1.4B).
Cleardale Station (Field, Donna)	63	<ul style="list-style-type: none"> 1.1 D - Much work and money has been put into the Hinds Drains already and many are ECAN managed as well as having an active working party. There would be better areas to target to do ecological assessments on. The 3 that I see are very threatened are the foothills, the high country and the coastal dongas. These would be higher priority to do ecological assessments on. 1.3 . Weeds (particularly ecological weeds) and clearance of vegetation are our biggest threats to biodiversity. I would like to see more specific actions in this section. I realise that it weed and pest control is an ongoing expense and good on ADC for controlling in their own reserves and land however 	<p>Ecological assessment at the foothills and other Ashburton District areas has been captured in Objective 1.1a and c.</p> <p>On the other hand, Hinds drain is a unique wetland area in the district, and we will review all reports to date to establish knowledge gap</p>

Submitter name	Page	Summary	Staff comments
		<p>action A is non committal and weak as a statement on how weeds and pests will be addressed by ADC on non ADC managed land. Additional actions.</p> <ul style="list-style-type: none"> • ADC needs to keep its current rule on planting of high threat weed species in rural B and C. This is plants like sycamores, willows poplars etc. Species also need to be updated. I would like this put in as an action. • This rule also needs to be resourced to check that people are complying with it. • Potential weed trees (particularly plantings for carbon) such as Douglas fir/Eucalyptus planting need to be controlled and kept away from areas they may spread particularly in the high country and foothills. An action addressing plantation and carbon planting suitable areas would be good to have included. • Development of hill and high country with associated loss of biodiversity is still ongoing within ADC area. Compliance, monitoring and enforcement needs to be put in place to prevent this. We have had a long time doing education to no avail. • Proposed additional Action: <ul style="list-style-type: none"> - Rules will be enforced for landowners who contravene biodiversity management rules or - Financial resources will be budgeted for enforcement of non compliance for landowners who contravene biodiversity management rules. General Budget to support monitoring so we know what is happening with our biodiversity. 	<p>and advice the Council on what needs to be done further.</p> <p>Council is currently supporting sycamore control at the foothills through its operation at Taylors Stream and providing funding on non-ADC land through its biodiversity grant.</p> <p>Council to consider other suggestions during deliberation.</p>
Forest & Bird (Clemens, Val)	91	<ul style="list-style-type: none"> • Objective 1.1D, undertake ecological assessment of Hinds Drains: A large amount of study in the drains has occurred with the University of Canterbury's CAREX project, involvement from Fish and Game as well as the Hinds Drains Working Committee formed by the Ashburton Zone Committee in 2014. • There are other areas of the district that have had little study or input, such as the Foothills Streams, so I would like to see the removal of this specific objective or its broadening to include waterways in other areas. 	<p>Council to consider other suggestions during deliberation.</p> <p>Hinds drain is a unique wetland area in the district, and we will review all reports to date to establish knowledge gap and advice the Council on what needs to be done further.</p>

Submitter name	Page	Summary	Staff comments
Fish and Game (Dellaway, Nicola)	89	<ul style="list-style-type: none"> • Council could consider predator proof fencing an area/s and undertaking predator control within the area creating an ecosanctuary/s. Not only is this a great community asset but also acts as an insurance policy should further species loss occur in the wild. • An ecosanctuary can safeguard a small population of species that will naturally repopulate the wild when the conditions allow. 	<p>Council currently has Harris Scientific Reserve as an insurance reserve for rare canterbury plants and with rabbit-proof fencing.</p> <p>We will continue to look around for a potential site to be used as an ecosanctuary within the district.</p>
Mabon, Richard	119	<ul style="list-style-type: none"> • The timeframe for 1.1 E. is too long when your objective is simply to "prepare for" plan changes and you expect this to take anywhere from 3-10+ years. In 3-10 years I'd expect them to be in the District Plan. • I don't understand Objective 1.3C at all. I don't understand how talking with nurseries and garden centres promotes weed prevention. Please explain. • The "Who" for 1.3 D is incomplete as community groups have been regular participants in work to implement wilding tree eradication at lakes Camp & Clearwater. RE Comment Methven Lions about the timeframes for actions 1.3B and 1.3D: as much as I applaud their sense of urgency I suspect these activities (wilding tree removal and pest control) will require ongoing investment. 	<p>Working with nurseries will ensure that plants recognised as weeds or unwanted organism under Regional Pest Management Plan would not be propagated and distributed around the district.</p> <p>Staff proposes to add adding ADBAG to "who" column in Actin 1.3D.</p> <p>Council to consider other suggestions during deliberation.</p>
QEII National Trust (Lindsay, Kate)	161	<ul style="list-style-type: none"> • A number of actions under goal 1 refer to the review of the Ashburton District Plan. This review will be critical to ensure that identified SNAs are protected by robust planning rules (including more stringent indigenous vegetation clearance rules) to prevent further loss of indigenous biodiversity values. We note that identification and protection of SNAs is just the first step, and that landowners, community groups etc who are stewards of these areas need to be supported (education, resources etc) to take action to maintain and enhance these areas. It's only through 	<p>Council to consider during deliberations.</p>

Submitter name	Page	Summary	Staff comments
		<p>protection and active stewardship that real reversal of Ashburton’s biodiversity crisis will be achieved.</p> <ul style="list-style-type: none"> • We’re pleased to see Action 1.1.B “Encourage covenants and other forms of land protection in private properties and Council reserves with ecological values” and look forward to working with council and private landowners to support the protection and stewardship of indigenous biodiversity on private land in the district. • Council can “encourage” covenants through outreach and education with landowners and providing funding support for covenant establishment and ongoing covenant stewardship. • Strengthen and prioritise Action 1.4B – “Review ADC vegetation clearance rule for rural zones and implement changes to provide better protection for indigenous biodiversity.” • In line with a review of the district plan, we’d like to see an action around increased education and enforcement of district plan rules that protect indigenous biodiversity. • Objective 1.3 Council needs to take a strong stance on the impact of wilding species such as wilding conifers, sycamores, plums and cherries – these continue to invade natural environments like braided rivers, montane tussock lands, shrublands and suppress the natural regeneration of many indigenous species. 	
KANUKA MID CANTERBURY REGENERATION TRUST (Rushton, Claire)	112	<ul style="list-style-type: none"> • 1.1A Kanuka Trust also supports the completion of an assessment of the district’s ecological values, as this is a project that the Trust has identified as critical for the district since the Trust’s inception. To date, the Trust has not been resourced to undertake such as an assessment, so would strongly support this work being undertaken and shared with the community. 	
Forest & Bird (Clemens, Val)	91	<ul style="list-style-type: none"> • Objective 1.4. Where possible the Council's influence and its participation in the Zone Committee could be used to ameliorate the effects of farm development and the damage being inflicted on high country lakes, particularly, by fertiliser runoff and farm development. 	

Submitter name	Page	Summary	Staff comments
Lake Clearwater Hutholders (Keen, Maureen)	117	<ul style="list-style-type: none"> 1.4 Restrictions on adventuring on motor bikes and 4 wheel drive. Have allocated places for this activity so that our backcountry is not destroyed. Education in this area so that people realise the damage that can be done to the fragile environment records in New Zealand. 	Motorbikes and 4 wheel-drive issues at Lake Camp/Clearwater have been covered under the Councils' 30-year plan for Lake Camp/Clearwater.
Rupp, Emma	169	<ul style="list-style-type: none"> Constant predator trapping 	
GOAL 2			
Poff, Jono	147	<ul style="list-style-type: none"> Biodiversity strategy needs to be aligned with decisions by domain boards, etc, which typically favour financial goals over environmental ones, such as use of surplus land for exotic planting or leasing to farmers, rather than rewilding. The chief objections of these boards to native planting proposals are: lost financial opportunities and/or uncertainty about responsibility for ongoing care of indigenous planting. There need to be processes to facilitate decisions favouring biodiversity over short term fiscal management. Financial decisions should take the long view, for example: over a longer term, permanent native planting may be worth more as carbon credits than Pinus for carbon or logging. 	Council to consider during the deliberation.
Cleardale Station (Field, Donna)	63	<ul style="list-style-type: none"> Goal 2 2.1 I would like to see an action that says there is no further loss of indigenous vegetation cover. 2.3- A and B- These are great actions 2.4 Rakaia Gorge should be included in A 	Staff propose including "Rakaia Gorge" to objective 2.4A.
Fish and Game (Dellaway, Nicola)	89	<ul style="list-style-type: none"> 2.1A Council could lobby relevant governing body to implement an initiative to purchase riparian land at at-risk sites. 	

Submitter name	Page	Summary	Staff comments
Mabon, Richard	119	<ul style="list-style-type: none"> 2.1 B - I think this is a task best led by landowners &/or Federated Farmers, with Council providing support through its expertise in indigenous biodiversity. 2.1 C - this task would be best led by landowners or a group featuring landowners in its membership such as MCCC. ADC should be a support party. 2.3 A to C - agree with all elements but query whether ADC is the right agency to lead on 2.3 C. None of the parties named seem ideal to me. 2.4 Delete all elements. Too much work to be done restoring and enhancing biodiversity over the next 20 years to be distracted by tourism "opportunities". Jessica Falconi sees ecotourism as a potential source of funding for future action on biodiversity, and she may well prove correct. The Oamaru Blue Penguin Colony is an excellent example of how ecotourism ventures can generate a return and invest back in the wellbeing of the wildlife itself. I remain of the view that, for the 20-year life of this strategy, energy should be focused on protection and enhancement of biodiversity rather than tourism. 	<p>For 2.1B, Council role is to influence the action while working with farmers.</p> <p>Staff propose to include Federated farmers, MCCC and ADBAG to “who” column.</p> <p>Council to consider other points during the deliberation.</p>
QEII National Trust (Lindsay, Kate)	161	<ul style="list-style-type: none"> QEII strongly supports this goal (2) though we note that with finite resources, the priority should remain protection of remnant biodiversity first and foremost, as highlighted in the Canterbury Biodiversity Strategy. Recreating indigenous biodiversity “from scratch” is never as ecologically representative and resilient as regenerated areas from remnant biodiversity and is also significantly more resource intensive. We particularly support the objectives and actions around focusing restoration efforts on ecological buffers and corridors, connecting areas of existing indigenous biodiversity. We strongly support 2.3. A-B to investigate and provide incentives to landowners with indigenous vegetation on their farmlands. In QEII’s experience incentives can be an effective way of engaging landowners and making protection and enhancement efforts more affordable. Mechanisms 	<p>Information on eco-sourcing is publicly available. Also, Council is currently working with local nurseries and stakeholders on eco-sourcing of seed and cuttings for biodiversity planting around the district.</p> <p>Council to consider these points during the deliberation.</p>

Submitter name	Page	Summary	Staff comments
		<p>like incentives can help move landowners from simply protecting areas as required through the district plan, towards being active stewards of biodiversity on their land (as referenced above).</p> <ul style="list-style-type: none"> • We encourage ADC to use the Reserves Act to create Scientific Reserves to provide the highest level of protection to remaining areas of national significant biodiversity, for example, sites of significance to braided river birds. • For restoration work in the district, we think the council should seek advice from rūnaka and scientists (e.g., Manaaki Whenua) on eco-sourcing plants in a district with significantly depleted biodiversity and provide this advice to nurseries. We think there's a potential role here for the ADC botanical gardens to develop and conserve local genetics of indigenous flora species. 	
Ralston, Mary	165	<ul style="list-style-type: none"> • 2.2 Biodiversity corridors should be encouraged on all farmland, not just “unproductive farm blocks”. • 2.4 Facilitating ecotourism should not be a priority. There are downsides – e.g. disruption of nesting birds, increased traffic in the backcountry that is valued for peace and quiet, jet skis and boats disturbing birds on lakes and rivers. 	
Forest & Bird (Snoyink, Nikky / Smith, Edith)	94	<ul style="list-style-type: none"> • 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 <i>by providing incentives such as rates relief on covenanted areas.</i> • 2.4: Eco-tourism through biodiversity is encouraged and promoted in Ashburton District – <i>while ensuring that impacts are avoided, remedied, or mitigated.</i> 	<p>Officers propose to add “.. <i>while ensuring that impacts are avoided, remedied, or mitigated</i>” to 2.4 objective.</p> <p>Council to consider during deliberations.</p>
Lake Clearwater Hutholders (Keen, Maureen)	117	<ul style="list-style-type: none"> • 2.4 Tourism - Ensuring tourism is sustainable and is respecting the delicate environments in which they visit. Making sure that Mid Canterbury is a place 	

Submitter name	Page	Summary	Staff comments
		where everyone can go and experience the peace and tranquillity of the unique hills, mountains and waterways.	
Early, Alison	69	<ul style="list-style-type: none"> On Falcon drive there is a parking roundabout planted with camellias and rhododendrons + azaleas. Stunning over a few months in spring. A few of the largest plants could be replaced with attractive food sources for birds. 	
Beach, Ian	61	<ul style="list-style-type: none"> good to see natives being planted to encourage more native species 	
Poff, Jono	147	<ul style="list-style-type: none"> Draft proposal for a native planting and walkway in Mount Somers, on the site of a previous Domain Board managed shelter belt. Site has since been proposed for construction of a swale, to redirect flood water away from the village, into the Sth Ashburton River. This swale could potentially coexist with and enhance the proposed walkway and planting. Opportunity for a productive synergy that could achieve multiple goals and provide an amenity and service for future generations. 	Email with proposal is shared with Council as amendment to submission.
Holmes, Wayne	106	<ul style="list-style-type: none"> Plant more native trees along streets and in parks instead of the introduced species that are existing in most places and continue to be planted. 	See 2.1.D Encourage the use of native vegetation for Council planting projects (street trees, reserves and berms)
GOAL 3			
Cleardale Station (Field, Donna)	63	<ul style="list-style-type: none"> Goal 3: Under this section and additional action would be that talking about when education doesn't work regulations and enforcement will be additional back up tools 	
Rupp, Emma	169	<ul style="list-style-type: none"> Environmental based learning and resources. 	
Fish and Game (Dellaway, Nicola)	89	<ul style="list-style-type: none"> Council needs to undergo a shift of focus from office research to more physical on the ground action. If researchers are employed it should be on short term contracts with the aim to then enact on the output/findings. A 	

Submitter name	Page	Summary	Staff comments
		lot of research on climate change is already available. Immediate actions can be identified from this.	
Lake Clearwater Hutholders (Keen, Maureen)	117	<ul style="list-style-type: none"> Under 3.3B Bioblitz - Lincoln had a Bioblitz in 2009 which you can read about here (https://lincolnecolony.org.nz/2009/04/30/bioblitz-lincoln-2009-1637-species-in-24-hours/) This was an amazing event which I was a part of. This event provided a springboard for knowledge understanding and future developments in the Lincoln area. 	
Mabon, Richard	119	<ul style="list-style-type: none"> 3.1 A - Suggest ADBAG should lead, rather than ADC. 3.1 C - ADC role to fund this work? Take care not to reinvent the wheel here. 3.1 E - Add ADBAG as a specific stakeholder. 	For 3.1A, the action is ongoing and currently led by the Council. Staff propose to consider including ADBAG a specific stakeholder to 3.1E.
Staveley Camp Forest (De Spa, Gen)	174	<ul style="list-style-type: none"> Consider Regenerative Practitioner Series education for all Council staff so that all processes can be viewed through a living systems approach rather than linear thinking. 	
Forest & Bird (Clemens, Val)	91	<ul style="list-style-type: none"> Produce a booklet/webpage listing Ashburton's ecosystem types and the indigenous plants found there to be used by the public and council considering native plantings. REf. Lucas and Associates 'Otautahi Christchurch Indigenous Ecosystems and Planting Guides', where soil types, suitable plant species and vegetation characteristics etc are listed. Such information would be invaluable for this district. 	
Wall, Kim	183	<ul style="list-style-type: none"> Currently school environmental programmes can be hindered by funding constraints, time, the right people to drive a project or plan forward etc. Often there are great ideas out there but they are difficult to put into practice due to a disconnect (for many reasons) along the way. It would be great to streamline support that didn't require lots of paperwork or input 	

Submitter name	Page	Summary	Staff comments
		financially from schools. Schools are short on both time and funds to educate our next generation of future leaders.	
KANUKA MID CANTERBURY REGENERATION TRUST (Rushton, Claire)	112	<ul style="list-style-type: none"> We have experienced that there are many people in our community, particularly in our rural community, who want to get involved with projects that will benefit the environment, but do not necessarily always know where or how to start. Therefore, education, sharing of knowledge and providing opportunities to support biodiversity must be strongly encouraged by ADC. 3.1A Kanuka Trust also supports the creation of general biodiversity information on the district and its features for distribution to the public. This is another area that the Trust has highlighted as critical for our district. We are aware of similar material produced in other areas of New Zealand which is invaluable as an educational tool for those communities. Given Kanuka Trust's work within the education sector and the wider community, the Trust submits that it should be named in the 'Who' section of relevant education and collaboration 'Actions' in the Strategy, e.g. 3.3 (A), 3.3 (F), 3.4 (A), 3.4 (B). 	Kanuka Trust is considered one of the stakeholders mentioned in the who column (see list of stakeholders in page 21 of the draft strategy).
GOAL 4			
Cleardale Station (Field, Donna)	63	<ul style="list-style-type: none"> I would like to express that so far, there has been little acknowledgment of the work Forest and Bird have put into protecting biodiversity within the Ashburton District. They were the initiators of Lake Camp and Clearwater weed control and landscape plan, The Wakanui Beach project and the Harris Scientific Reserve. 	
Mabon, Richard	119	<ul style="list-style-type: none"> 4.1 B - This is normal business as usual not a strategic objective. Delete and keep doing it. 4.2 - Replace "leadership" with "support" 4.2 B - please clarify what is meant by "review of project code/standard" 4.3 C - add "sponsors" to "Who". 	4.2B - staff recommend adding project code/standard definition to glossary

Submitter name	Page	Summary	Staff comments
Forest & Bird (Snoyink, Nikky / Smith, Edith)	94	<ul style="list-style-type: none"> 4.4 Community projects that aim to protect, maintain, and enhance indigenous biodiversity are supported <i>with adequate grants which are well publicised with straightforward application forms.</i> 	
KANUKA MID CANTERBURY REGENERATION TRUST (Rushton, Claire)	112	<ul style="list-style-type: none"> 4.3 A / 4.4. A: Given Kanuka Trust’s work within the education sector and the wider community, the Trust submits that it should be named in the ‘Who’ section of relevant education and collaboration ‘Actions’ in the Strategy. 	Kanuka Trust is considered one of the stakeholders mentioned in the who column (see list of stakeholders in page 21 of the draft strategy).

5. Any other comments

Other comments on the following topics were received:

- | | |
|--|---|
| <ol style="list-style-type: none"> 1. General 2. Resource & Funding 3. Landowners 4. Ecological values/SNA's | <ol style="list-style-type: none"> 5. Reporting & Monitoring 6. Water Management 7. Council Role 8. Strategy alignment / Context 9. Other Comments |
|--|---|

Submitter name	Page	Summary	Staff comments
1. General			
Forest & Bird (Snoyink, Nikky / Smith, Edith)	94	<ul style="list-style-type: none"> • 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. However some parts could be strengthened in order to provide more alignment with national direction and greater clarity of purpose. 	
Eason, Ed	73	<ul style="list-style-type: none"> • Once again, a very well thought out document, that has my full support. I personally wonder if there is however, a case to be made, for a really concerted education promotion of the plan, into all local schools, as the current students are the future of this community. 	School programs, kanuka Trust/ACCT led and EnviroSchool, are ongoing but improvement is proposed through this strategy.
Groenewald, Leré (AYC)	29	<ul style="list-style-type: none"> • I think this is a really good idea. 	
Hawkes, Murray	104	<ul style="list-style-type: none"> • This entire exercise is cynical greenwashing, 	
Lake Clearwater Hutholders (Keen, Maureen)	117	<ul style="list-style-type: none"> • I recognise that a lot of effort has gone into the preparation of this Biodiversity Strategy. Many generations of people have enjoyed tramping 	

Submitter name	Page	Summary	Staff comments
		and water activities particularly in the high country and I hope that future generations will continue to enjoy an even more enhanced environment.	
Forest & Bird (Clemens, Val)	91	<ul style="list-style-type: none"> I really appreciate the work being done by BDO Christian Chukwuka. Having such a well qualified and enthusiastic person working within ADC has made a huge difference to the amount and quality of work being done in this area by ADC. 	
Mid Canterbury Catchment Collective (Leferink, Willy)	136	<ul style="list-style-type: none"> That in 20 years the people of the Ashburton District will be proud of what they have achieved in the last 20 years. 	
Everest, Phillip	75	<ul style="list-style-type: none"> The Community need to buy into it - AND invest their own time and money and not expect everything to be provided by 'someone else'. 	
Mabon, Richard	119	<ul style="list-style-type: none"> I strongly believe that Council needs to pay close attention to the sustainability of its services and to maximise the value it can derive from ratepayer funds. There are a number of examples where Council enables other organisations to deliver services and maintain assets - Reserve Boards & Hall Committees are two examples. There is already substantial community involvement in the delivery of projects that support and enhance biodiversity and Council would be wise to support more community leadership than to assume that it will lead by default. This comment comes from a belief that, wherever feasible, community leadership will be more enduring and more cost-effective than Government - be it local or central. Like many other submitters including Ed Eason and Allison Early, I would also add my thanks and congratulations to those involved in preparing the Draft Biodiversity Strategy to this point. There is much in the document that deserves praise and it is a good basis for public feedback on improvements. 	
QEII National Trust (Lindsay, Kate)	161	<ul style="list-style-type: none"> Overall, we support the draft biodiversity strategy and feel positive about the direction it is taking. However, we would like to see more urgency conveyed in the strategy, and clearer targets and measures of progress/success. The biodiversity strategy should be a call to action – we would like to see more emphasis put on the serious state of biodiversity in the district, and 	<p>Staff proposes to add more information on uncommon ecosystems around the district.</p> <p>However, threat status of plants and animals found in the district is</p>

Submitter name	Page	Summary	Staff comments
		<p>the need to take urgent action. While the strategy does outline the threats facing biodiversity in the district, we don't think it conveys the urgency with which we need to approach this work.</p> <ul style="list-style-type: none"> Page 12-15 presents a good summary of indigenous biodiversity in the district, but we would like to see some more specific information included e.g., what kind of naturally uncommon ecosystems are represented in the district, what proportion of land is already protected, how many indigenous species are known to be found in the district, what are their threat statuses etc. We would also like to see the inclusion of a map showing Threatened Environment Classification across the Ashburton District as this would be an impactful way to show the story of loss of indigenous vegetation cover and lack of biodiversity protection, particularly on the Ashburton Plains. 	<p>outside the scope of the strategy booklet. Staff propose to develop and make this information available online on ADC website.</p>
Ralston, Mary	165	<ul style="list-style-type: none"> Native biodiversity is in crisis in the Ashburton District, and so it is extremely important that ADC recognises that because there is so little native habitat left in the Ashburton District that all remaining native vegetation should be protected. This should go further than what is already outlined in the District Plan (eg, no removal of native vegetation on the Canterbury Plains), it should include actions on the ground to protect remnants, such as fencing off roadside vegetation, weed and pest control and restoration such as enhanced planting to provide a habitat rather than just a remnant. In the foothills, there is more remaining native vegetation and habitat for native fauna than on the plains and coast, but it is increasingly encroached upon by agricultural development, and forestry that has the potential to become weeds, and pests that threaten native remnants. In the high country, weeds and pests are serious issues. Working with other agencies on the eradication of goats, deer and tahr must be high priority as these pests are seriously reducing biodiversity values as high country vegetation and foothills forest understorey are eaten out. Improvements in native biodiversity also offers the opportunity for enhanced carbon sequestration. Thriving wetlands, forests, estuaries and 	

Submitter name	Page	Summary	Staff comments
		<p>coastal lagoons capture and store large amounts of carbon as well as being valuable biodiversity hotspots.</p> <ul style="list-style-type: none"> Biodiversity protection cannot be seen in isolation: the huge loss we have seen in the district over the last twenty years has largely been the result of agricultural development, so policies must be aligned so that biodiversity protection is considered at every decision in all departments. 	
Perkins, Marion	143	<ul style="list-style-type: none"> I have seen many good trees fallen in the wake of building craze. It is offensive to see. 	
KANUKA MID CANTERBURY REGENERATION TRUST (Rushton, Claire)	112	<ul style="list-style-type: none"> Kanuka Trust is supportive of the continuation of ADBAG, as this Group has brought together a passionate group who continue to make great progress in supporting biodiversity in our district. 	
Page, Maddie/ Foster, Summer / Wang, Isabel / Aguila, Sophia / Lupse, Carina (AYC)	21-57	<ul style="list-style-type: none"> Ecological values were mentioned many times however I was unable to find said values listed. We believe they should be listed for the community to view so they can correctly comment. 	Staff proposes to add ecological values definition to glossary.
2. RESOURCES & FUNDING			
Eason, Ed	73	<ul style="list-style-type: none"> If finance allows, council could at this early stage of the strategy, offer a subsidy to groups like farmers, to plant more native species on their land, and offer greater encouragement to landowners to leave and indeed, restore wetlands. 	
Anonymous 6	18	<ul style="list-style-type: none"> More money and support to groups that are working on pest and weed management 	
Staveley Camp Forest (De Spa, Gen)	174	<ul style="list-style-type: none"> There needs to be more funding in this region for the protection and restoration of native habitats. Obviously we have a tension between the land-based extractive industry which has given our region its immense wealth, and regenerating our native habitats and ecosystems. We are living in an economic system that causes us to value the things we pay money for and often treat as if we don't value the things we don't pay 	Staff propose to recommend establishing "Community Natural Environment Fund" for private sectors, developers and corporate bodies to donate into for landowner and community project support (separate from the Council Biodiversity Grant).

Submitter name	Page	Summary	Staff comments
		<p>for. Hence we have a situation in which the capital that is being used up in production is our natural capital (land, air, water) and the costs of degrading those are then ‘externalised’ onto future generations rather than being paid for as a cost of doing business. In this system, the most direct way to protect and restore native ecosystems or not have them destroyed or degraded in the first place would be to factor in the costs of degrading native ecosystems into the costs of doing business.</p> <ul style="list-style-type: none"> • While the ‘internalisation’ of the costs of degrading the environment is not entirely possible and can also cause unintended consequences, it could be possible and more effective to set up a fund that stakeholders and the community could donate into to recognize and honour the fact that the impressive wealth of this region comes at the direct cost of our native ecosystems. Council could administer this fund to go towards the protection and regeneration of the mosaic of native habitats which would be emerging, many of which would be on the land of stakeholders who might have paid into the fund. This would be a ‘Pay It Forward’ approach, which is essentially the approach towards retaining our native species for future generations that would be good to foster in order to make it happen. • Other ways we could consider resourcing these goals could be through a local currency or rewards system. This could be designed, for example, so that businesses who recognize the costs on the environment and wish to help to mitigate those but are not able to take any practical measures can offer their products or services at a discounted rate to those who are actively engaged in ecosystem restoration. 	
Methven Lions Club Inc (McElwain, Mac)	132	<ul style="list-style-type: none"> • Please ensure that there's adequate funding made available to community groups to implement strategies. I am leader of the Methven Lions drive to Bring Back Birdsong with The Birdsong Initiative in Methven and in the Foothills. We have the will to do it. We need the funding to deliver the dream. 	

Submitter name	Page	Summary	Staff comments
QEII National Trust (Lindsay, Kate)	161	<ul style="list-style-type: none"> <li data-bbox="712 204 1630 480">• The work identified in the draft strategy will require significant resource. We would like to see the council increase the funding available to landowners for protection and enhancement projects to the extent that it will make a material difference. While the \$15,000 per annum Biodiversity Grant is a great start, it's significantly below what is required to facilitate landowners, community groups etc to take impactful action. We would support a funding boost for the Biodiversity Grant through the next annual and/or long-term plan process. <li data-bbox="712 496 1630 657">• 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. 	

Submitter name	Page	Summary	Staff comments
Federated Farmers (Acland, David)	79	<ul style="list-style-type: none"> • We note that \$15,000 is available per year (detailed on p.26) as a biodiversity grant for community projects. The ADC website states that the maximum grant available per individual is \$7,500 (at no more than 50% of the total project cost). • We question if the amount allocated to this grant has increased in recent years, and if the Council is planning on increasing this amount when the policy settings change in relation to SNAs. • An assessment of other councils provides an interesting comparison: <ul style="list-style-type: none"> • Nelson City Council - \$20,000 annually available per project as an Environmental Grant for individuals working to improve the health of the environment. • Waitaki District Council - \$30,000 annually available for landowners who are taking practical steps to protect and enhance indigenous biodiversity. • Waimakariri District Council – Biodiversity Contestable Fund available to owners of mapped SNAs (fund amount not disclosed). • Tasman District Council – Catchment Enhancement Fund available (amount not disclosed) • Christchurch City Council – Biodiversity Fund available of up to \$400,000 per year. • We would like to see the Council allocate more than \$15,000 annually. Protection of biodiversity is a public good, with the responsibility often falling to the private landowner to bear the cost. \$15,000 per project would be a more reasonable amount, but more work is needed to determine this. • An example of biodiversity as a public good is establishing a wetland which would benefit entire communities. Establishing a wetland could cost more than \$15,000. • Encouragement and education of landowners are methods the Council could use through promotion of the biodiversity grant but the amount available to landowners must be enough to incentivise landowners to undertake biodiversity protection. The Council must ensure the grant is well advertised and promoted. We suggest using Farmers Weekly or other rural publications. 	<p>Grant amount has not been increased in recent years.</p> <p>Council to consider during deliberations.</p>

Submitter name	Page	Summary	Staff comments
Ralston, Mary	165	<ul style="list-style-type: none"> Funding is crucial: the monitoring and compliance department must be adequately resourced to uphold the provisions of the District Plan, and the funding of protection, restoration, and weed and pest control must be taken seriously. 	
Forest & Bird (Snoyink, Nikky / Smith, Edith)	94	<ul style="list-style-type: none"> 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. 	
Mid Canterbury Catchment Collective (Leferink, Willy)	136	<ul style="list-style-type: none"> We are wondering if the development of a communal nursery which takes the native plants from juvenile to plant able would encourage more affordable biodiversity planting in the district. This has been successfully executed by the Taranaki Regional Council over the past decades. 	Council to consider during deliberations.
3. LANDOWNERS			
Harrison, Graeme	102	<ul style="list-style-type: none"> Landowners are almost an afterthought. They should be central to facilitating a successful strategy. I am a practical environmentalist who has had negative experiences with faceless ideologs and regulators, yet has pressed on fencing and closing off from livestock substantial areas of montane scrubland, subalpine red tussock grassland, black beech and podocarp forests, and personally planting sizeable areas of native trees, shrubs and grasses on lowland areas. Current ADC regulations for Rural C land are not fit for purpose and need to be changed. 	ADC regulations for Rural C land will be considered in future District Plan rule review as part of objective 1.4b implementation.
Gibbs, Chris	100	<ul style="list-style-type: none"> Not enough landowner/occupier and catchment/community group involvement in these goals. Need 'bottom up' approach to get community engagement 	

Submitter name	Page	Summary	Staff comments
Federated Farmers	81-82	<ul style="list-style-type: none"> • Federated Farmers strongly acknowledges the importance of indigenous biodiversity. • Key to the success of any strategy on indigenous biodiversity, is the establishment and maintenance of ‘trust’ between landowners and councils. This relies heavily on an approach of partnership, respect, and inclusion of impacted landowners on all matters that relate to private land. • Unlike interest groups whose focus is often natural preservation at all costs, there are real costs to farm landowners in protecting biodiversity. • Biodiversity protection should be encouraged at all levels, from individuals, landowners, interest groups and communities, through to local, regional and central government. • At a broad level, we suggest the following measures: <ol style="list-style-type: none"> 1) Ensuring sufficient information, advice, and knowledge is provided to landowners, to support and enable them to incorporate biodiversity into their day-to-day farm management. 2) Ensuring sufficient monitoring and reporting of biodiversity outcomes to enable tracking of success/failure of initiatives/progress, so that these can be built upon. 3) Ensuring support for landowners undertaking voluntary management of indigenous biodiversity habitats on privately-owned land that go beyond regulatory requirements. • The continued investment in the biodiversity grant for landowners/community groups to apply for assistance in relation to costs associated with preservation of biodiversity. 	
Alford Landcare Group (Totty, Alan)	6	<ul style="list-style-type: none"> • Ashburton District Council needs to recognise and support the work that QE2 National Trust does in this district, working with landowners. • Collaboration and patience are the keys to success when dealing with landowners and QE2 staff have been very successful over the last 40 years. Some landowners need time to understand the value of their biodiversity before becoming fully committed to its preservation. QE2 covenants must continue to be a recognized alternative to District Plan rules. Recently a discussion Group of QE2 covenant holders has been formed to visit 	

Submitter name	Page	Summary	Staff comments
		<p>covenants and share ideas on how management of the covenant could be improved. This is an indicator of how QE2 has built up good relationships in this district.</p> <ul style="list-style-type: none"> The Council needs to show a degree of flexibility when imposing planning rules in cases where landowners at their own cost, are carrying out large scale biodiversity protection work such as fencing and the creation of wetlands. The District Council officers tasked with communicating with landowners, need to understand the connection landowners have with their land especially when these landowners have/are expending considerable amounts of their time, and money creating and improving biodiversity on their land. 	
MHV Water (Brooks, Melanie)	134	<ul style="list-style-type: none"> More immediate focus should be given to incentivise landowner indigenous biodiversity plantings. Some sort of credit or offset to rates and this should be applied for existing and new indigenous plantings based on their area and state (ie they must be maintained). 	See 2.3A – 2.3B in Action plan (page 31)
Federated Farmers (Acland, David)	82	<ul style="list-style-type: none"> As part of our work in developing our submission on the (now gazetted) National Policy Statement for Indigenous Biodiversity (NPS-IB), Federated Farmers undertook a survey in 2019 of members nationally and these findings remain relevant. Through this survey farmers supported: <ol style="list-style-type: none"> Rates relief on land under regulatory protection (particularly Significant Natural Areas (SNAs). Provision of funding grants to landowners for the purpose of biodiversity management in areas under regulatory protection (particularly SNAs). Waiving of council consent and processing costs related to biodiversity. Cost sharing for ecological assessments on private land. Provision of educational material and expert advice to inform farm decision making. 	<p>See 2.3A – 2.3B in Action plan (page 31)</p> <p>Council to consider other points during deliberations.</p>

Submitter name	Page	Summary	Staff comments
4. Ecological Sites / SNA's			
MHV Water (Brooks, Melanie)	134	<ul style="list-style-type: none"> I also have some concerns about the definition of SNAs. Clarity will be required, as well as a significant community outreach (as mentioned by the Mayor) to ensure that the process to identify SNAs doesn't create unintended consequences or become a deterrent to further plantings. I appreciate that SNAs are largely defined in the Act, but I still think there is some room for some scenarios to be worked through so that the application of the definition is fair and reasonable and doesn't encroach on property rights. 	
Federated Farmers (Acland, David)	83	<ul style="list-style-type: none"> SNAs are highly contentious, and we urge the Council to be cautious with how they are addressed in this strategy. We would like to understand how the Council plans on mapping SNAs as this has huge implications for the farming sector. Farmers are fearful that identification of SNAs will lead to a decrease in the property value, as is occurring elsewhere in New Zealand. They are concerned that they will still have to pay rates for land which is not able to be farmed to the best potential. MCOFF believes that unless areas have been properly mapped and included in the District Plan, they cannot be treated by the Council as an SNA. Mapping of these areas must be undertaken in partnership with landowners. We would like to see this reflected in the strategy. We support non-regulatory methods to managing SNAs and would be happy to work with the Council and our members to achieve this. Long-term, there are opportunities to use technology to support farmers in some of the more challenging landscapes of the district. For example, fencing is not possible for many waterways on steeper slopes of the Foothills. The use of Halter collars is something the Council could incentivise 	

Submitter name	Page	Summary	Staff comments
		landowners to use, as currently the collars are not financially viable for this use.	
5. MONITORING & REPORTING			
Anonymous 3	12	<ul style="list-style-type: none"> What mechanism is in place to measure the success of the strategy. 	Reporting is scheduled annually with an interim review of the Action Plan after the first 12 months and a full review every three years (see page 26 in draft Biodiversity Strategy).
QEII National Trust (Lindsay, Kate)	161	<ul style="list-style-type: none"> We strongly support annual reporting on the Action Plan’s implementation, and a full review every three years. In QEII’s experience, it’s easy for work to lose momentum once strategies and action plans reach implementation stage. Annual review is critical to ensure that the plan is being implemented and progress is being made. As mentioned above, it’s important that council has the right information and data to assess progress and effectiveness of actions that are being taken, e.g., ecological monitoring. 	
Federated Farmers (Acland, David)	84	<ul style="list-style-type: none"> The Strategy states that reporting will occur annually. We would like to see a commitment from the Council in the Strategy that this report be made publicly available. 	The report will be made available on Council meeting agenda.
QEII National Trust (Lindsay, Kate)	161	<ul style="list-style-type: none"> Monitoring – there is no mention of this in the strategy document, and we think that ecological monitoring should be a key component of goal 1 (and 2). If we don’t know what direction things are going in, we can’t make informed decisions about what actions we should be investing in. We recognise that in implementing the NPSIB, the regional council will be required to develop a monitoring plan for SNAs and some of the other objectives of the NPS. At the very least, the regional council monitoring programme needs to feed into the monitoring and review of the Ashburton biodiversity strategy. 	Annual Monitoring of district biodiversity is already ongoing as part of Council operation. Under NPS-IB, Regional Council is also developing a consistent biodiversity monitoring program for Canterbury region.

Submitter name	Page	Summary	Staff comments
6. WATER MANAGEMENT			
Hawkes, Murray	104	<ul style="list-style-type: none"> Draft plan has no mention of maintaining minimum flows on drains and races to maintain wetlands on the plains, council are actively working to reduce aquatic biodiversity 	Management of water flow in drains is administered by Environmental Canterbury while water races are contained in Council Surface Water Strategy. These are not covered in this strategy.
MHV Water (Brooks, Mel)	134	<ul style="list-style-type: none"> Stormwater management is a key concern. Management of stormwater, in conjunction with MAR and wetland habitat to control large flows needs more focus. The CCC project in the upper catchment of Ōpāwaho/Heathcote River are significant to add value year round and also act as a stormwater basin at times of high flow. Would like to see initiatives like this that are potentially augmented in times of low flow (as needed to keep the wetland alive). They would add considerable amenity value alongside biodiversity and ecological. 	Council could propose Staff to research possible initiatives.
7. COUNCIL ROLE			
Mackenzie, Sharon	124	<ul style="list-style-type: none"> The council cannot even build a new council building within budget - 10 million over budget; 30 km zones everywhere; cones and poorly constructed roads. Our council should be given limited power and have nothing to do with 'biodiversity'. 	
Anonymous 5	16	<ul style="list-style-type: none"> Is this not the job of the utterly useless Ecan. 	
Anonymous 6	18	<ul style="list-style-type: none"> There has been a very big lack of leadership in the biodiversity area from the council. Very disappointing especially now there is a paid role. Need to see more of a hands on leadership approach. With ACTION! There are so many 	

Submitter name	Page	Summary	Staff comments
		<p>“low hanging fruit” projects! Good to see deer culling but need so much more...pigs, magpies, stoats, wasps, ferrets, etc</p>	
Alford Landcare Group (Totty, Alan)	6	<ul style="list-style-type: none"> • What would be of major benefit to biodiversity in the Ashburton District would be if ADC was to work with ECAN and DOC to eradicate serious weeds in riverbeds such as Sycamores in Taylors Stream. Individual approaches to both authorities, has fallen on deaf ears. Sycamores are spreading into DOC forest and into private biodiversity. • Alford Landcare Group representing landowners in the Foothills has been around in various forms for 30 years and initiated the ADC ‘Alford Forest Vegetation Monitoring program’ in 2001. This gave the District Council an opportunity to make a start at carrying out its obligations to monitor the environment in the district. The Council pays for the monitoring by an ecologist every 10 years. This program could be made more effective in providing the information that ADC needs, if the number of plots were increased and the frequency of monitoring reduced to every 5 years. 	Collaboration amongst stakeholders and community is key focus of this strategy.
Cushnie, Angela	67	<ul style="list-style-type: none"> • Central Government and the NPS for Biodiversity can have the impact of disengaging people rather than getting the community on board, this is something we experienced first-hand with the NPSFW. Decision makers taking learnings from the freshwater example would be prudent and ensure that we do not create unintended consequences. 	
Federated Farmers (Acland, David)	84	<ul style="list-style-type: none"> • The mandate for a city or district council in protecting/enhancing biodiversity is less apparent than that of a regional council. There are many objectives in this strategy that may be better left to Environment Canterbury. • ADC can play a strong role in advocating for the interests of Ashburton District through Environment Canterbury’s current and ongoing consultation ‘What’s our future, Canterbury?’. This is where we see ADC 	Biodiversity is a matter of national importance under section 6 of the RMA 1991. Both regional and district council have role to play in administering the provisions mentioned in the Act.

Submitter name	Page	Summary	Staff comments
		<p>would best be placed to ensure biodiversity outcomes for the district are met.</p> <ul style="list-style-type: none"> Beyond the District Plan, we believe the role of ADC in promoting/ protecting/ enhancing biodiversity outcomes is limited. Through the NPS-IB and the Local Government Act 2002, Council does have a role to play in environmental well-being. However, this must be balanced against ensuring good economic outcomes. Setting an unrealistic biodiversity strategy could hinder the economic well-being of the district’s rural communities. 	
8. STRATEGY ALIGNMENT & CONTEXT			
Forest & Bird (Snoyink, Nikky / Smith, Edith)	94	<ul style="list-style-type: none"> 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. Recommendation to include The National Adaptation Plan and the Emissions Reduction Plan should be included in the list of plans that the strategy seeks to align with (see climate change p.19) Align the district strategy goals with the Te Mana o te Taiao goals. Clearly articulate the guiding Priority Principle “Focus first on protecting and maintaining what remains, and then on restoring what has been lost” of the Biodiversity Strategy for the Canterbury Region 2008 in the ADC 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. 	Staff recommend including the NZCPS, Aotearoa New Zealand’s Biosecurity System Strategy and CRPMP to the strategy.

Submitter name	Page	Summary	Staff comments
		<ul style="list-style-type: none"> 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. 	
9. Other Comments			
Rupp, Emma	169	<ul style="list-style-type: none"> It would be amazing if the council really nailed down on farmers burning their rubbish, especially since its illegal. 	
Lake Clearwater Hutholders (Keen, Maureen)	117	<ul style="list-style-type: none"> The evidence of the impacts of light pollution on species and ecosystems has grown and strengthened. Increased Artificial Light at Night, known as ALAN, is directly linked to measurable negative impacts on energy consumption, human health, and wildlife such as bats, birds, insects, reptiles, amphibians, mammals, and plants. Unnecessary artificial light increases financial costs and contributes to greenhouse emissions. Many in the Lake Clearwater Community wanted our dark sky protected like around Lake Tekapo as the night sky is pristine and magnificent. Spreading fertiliser by air over the hills adjacent to lakes and rivers needs to be supervised and managed as this feeds directly into the waterways causing eutrophication in lakes. Fire preparedness - Making sure that with Climate Change we don’t have huge fires. Cessation of burning off crops as this destroys biodiversity and releases carbon into the atmosphere and damages the soil. 	<p>Included in Councils’ 30-year plan for Lake Camp/Clearwater</p> <p>Staff propose to pass comment on to ECan who manages nutrient intake in water bodies.</p>
Wells, Helen	188	<ul style="list-style-type: none"> Control of freedom camping at Lake Camp 	Included in Councils’ 30-year plan for Lake Camp/Clearwater
Seddon, Clive	173	<ul style="list-style-type: none"> Game Animals are a valuable asset and should be managed as such. 	
Everest, Phillip	76	<ul style="list-style-type: none"> Make sure that legislation ENABLES not put in road blocks. For example current rules to construct a wetland which could be good for biodiversity are prohibitively expensive requiring unnecessary and expensive consents. 	

Submitter name	Page	Summary	Staff comments
		Money that could be spent on developing wetlands is being wasted on consents - discouraging the action	