28 November 2025

Indigenous Biodiversity Strategy (2025) Feedback
Otago Regional Council
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Dunedin 9054

Via email: strategy@orc.govt.nz

DUNEDIN CITY COUNCIL SUBMISSION ON THE DRAFT OTAGO REGIONAL COUNCIL INDIGENOUS BIODIVERSITY STRATEGY 2025

Tēnā koutou

1. The Dunedin City Council (DCC) welcomes the opportunity to submit on the Otago Regional Council Indigenous Biodiversity Strategy 2025 (the Strategy) and recognises the important role of the Otago Regional Council (ORC) in maintaining and enhancing indigenous biodiversity across the region.

2. The DCC is committed to working collaboratively with ORC, mana whenua, and local communities to ensure that biodiversity across Ōtepoti Dunedin and wider Otago is protected, restored, and resilient.

3. The DCC notes that the Strategy aligns with key national and regional frameworks, including the National Policy Statement for Indigenous Biodiversity (NPS-IB- Section 3.23) and the Resource Management Act 1991 (RMA), as well as with DCC's own strategic frameworks such as Te Ao Tūroa – The Natural World Environment Strategy, Te Taki Haruru – Māori Strategic Framework, and the Future Development Strategy 2024-2034.

4. The DCC welcomes the focus on partnership with mana whenua, community empowerment, and the recognition of biodiversity as a foundation for ecological, environmental, cultural, and social wellbeing.

5. The DCC notes that the Strategy provides a strong direction for maintaining and enhancing biodiversity across land, freshwater, and coastal ecosystems. It:

    - integrates climate change as a central challenge
    - builds resilience into goals, outcomes and indicators
    - promotes connected ecosystem management
    - prioritises risk monitoring and responsive actions
    - supports whole-of-system change for adaptive biodiversity stewardship.

6. The DCC acknowledges the importance of this work and recognises that a coordinated regional approach is essential for achieving biodiversity outcomes. This includes working collaboratively with stakeholders, community groups, and volunteers, while ensuring property owners are informed and actively engaged throughout the process.

The Ōtepoti Dunedin Context

7. Urban biodiversity is a frontline climate adaptation tool for Ōtepoti Dunedin. Enhancing native biodiversity within urban landscapes through street tree networks, riparian planting and green infrastructure will reduce heat stress, mitigate flooding, and provide carbon sequestration. These nature-based solutions deliver co-benefits for ecological resilience and community wellbeing. ORC should explicitly recognize urban biodiversity as a strategic priority for climate adaptation and integrate it into regional planning and funding frameworks.

8. Ōtepoti Dunedin has set targets achieve net zero greenhouse gas emissions both as a city and as an organisation. The DCC acknowledge and appreciate the support of ORC and the other partners in the Zero Carbon Alliance on emissions-related opportunities, including carbon sequestration. Together these organisations can support the city to meet the challenge in a way that protects and enhances biodiversity.

Clarity on Site-Led Areas and Spatial Context

9. The Strategy makes some reference to site-led areas (primarily in Appendix 5), but it is not immediately clear whether the Strategy's actions and expectations apply solely to these areas or more broadly. DCC considers that inclusion of maps identifying ORC's designated site-led areas would greatly enhance the document. Spatial clarity will assist councils, landowners, and community groups to understand the scale and location of strategic priorities and associated operational implications.

Strategic Pou and Regulatory Expectations

10. DCC seeks clarification regarding the potential for increased compliance monitoring and enforcement under the Strategy's three Strategic Pou. At present, territorial authorities are monitored primarily for rabbit management.

11. DCC would appreciate confirmation on whether councils may, in future, be assessed against the full suite of species listed in the Regional Pest Management Plan (RPMP), using a pass/fail methodology similar to that applied to rabbits. If this is the intended direction, the associated financial and resourcing implications for local authorities will be substantial.

12. More generally, DCC recommends that the strategy more clearly distinguishes between regulatory and non-regulatory workstreams and outlines the process through which regulatory expectations will be defined, developed, or expanded.

Recognising Existing Conservation Work and Regional Partnerships

13. Under the strategic direction to ensure plans and decisions contribute to the maintenance and enhancement of indigenous biodiversity, DCC supports the intent to work with mana whenua and communities. We suggest explicitly including *local councils and government agencies* in this section.

14. DCC also recommends strengthening acknowledgement of the significant biodiversity protection work already undertaken by community groups, including Predator Free Dunedin

and many other conservation organisations. Their contributions are referenced only briefly in Appendix 5. Highlighting these partnerships more explicitly within the core strategy text would help reflect the collaborative, bottom-up nature of biodiversity action across Otago.

15. DCC recommends drawing a more explicit connection between the health of te taiao to the holistic health of not just mana whenua, but all residents of Ōtepoti Dunedin and Otago as a whole.

16. DCC also asks for clarification from the ORC if they see a difference between "partnering" and "collaborating" with mana whenua or other groups.

17. DCC supports the formation of a regional leadership group to coordinate strategic direction, improve consistency across agencies, and enable efficient yet informed decision making in areas of shared interest. A formalised group will help ensure alignment of regional and district-level investment, avoid duplication of restoration and monitoring efforts, and provide a mechanism for shared technical oversight. It also provides another opportunity to ensure central government, councils and mana whenua stay connected and encourage relationship building outside of their organisation. The DCC would like further information required on the governance and operation structure.

18. DCC strongly supports the collaborative approach and its focus on genuine partnership with mana whenua, private landowners, NGOs, and community groups. Most biodiversity values in Otago occur outside public conservation land and collaboration is fundamental to maintain indigenous biodiversity. The Strategy recognises that lasting action requires a collaborative approach.

19. To this end, DCC suggests wording such as:
"Working with mana whenua, our communities, local councils, government agencies, and existing conservation organisations, we will prepare and implement a fit-for-purpose Regional Pest Management Plan that addresses pests impacting indigenous biodiversity."

20. DCC also notes the potential value of referencing alignment with *Predator Free 2050* at a regional level. *Predator Free 2050* remains a powerful example of what was achieved through coordinated action, and celebrating its legacy reinforces the importance of ongoing collaboration to protect and restore biodiversity.

Landscape-Scale Visions and Catchment-Level Approaches

21. DCC supports the strategy's aspiration to co-design landscape-scale visions for indigenous biodiversity, including through catchment action plans. Commitment from mana whenua, communities, central government agencies, and councils will be essential to ensuring these visions meaningfully guide regional resource management, infrastructure investment, and long-term planning. Embedding these collective visions at the centre of Otago's approach would help achieve the coherence and consistency needed for long-term biodiversity outcomes.

22. DCC supports the ORC's approach to protecting biodiversity and biosecurity in the face of climate change threats and submits that ORC should integrate climate change mitigation and

adaptation considerations in strategy implementation. '*Growing sequestration that aligns with mana whenua and community values'* is a key shift for the city in DCC's Zero Carbon Plan. Protecting and enhancing biodiversity by growing native carbon sequestration supports local environmental outcomes as well as helping to mitigate climate-related pressure on all ecosystems.

Clarification Regarding the Regional Pest Management Plan (RPMP)

23. The strategy references ORC's existing RPMP in several locations but also states that ORC will "prepare and implement a fit-for-purpose Regional Pest Management Plan." As the current RPMP is operative until 2029, DCC seeks clarification on whether:
    - a full review of the RPMP is anticipated prior to 2029,
    - an update is proposed specifically to align with the new strategy, or
    - the intention is to implement the existing RPMP until its scheduled review.

    Understanding these expectations is important for territorial authorities in planning budgets, programmes, and compliance responses.

24. With respect to pest management and biosecurity in Appendix 5, DDC asks if it would be appropriate for ORC to work with the Te Rūnanga o Ngāi Tahu Hazardous Substances and New Organisms (HSNO) Kōmiti.

Development of a comprehensive, regionally shared biodiversity knowledge base

25. DCC strongly supports the establishment of a centralised biodiversity knowledge base, including baseline inventories, geospatial datasets, ecosystem threat assessments, and long-term monitoring indicators etc. A consistent and accessible knowledge base will help to:
    - improve evidence-based decision making
    - support monitoring of biodiversity trends
    - enable data sharing between councils/Department of Conversation/community etc.
    - help councils with limited ecological/biodiversity technical expertise to assess and manage biodiversity effects, monitor, and prioritise investment into biodiversity enhancement/protection.

26. The DCC notes that the ability to examine regional data at local scales will be particularly valuable for resource consent processes, compliance monitoring, and restoration planning/advice.

27. The Strategy's recognition of mātauraka Kāi Tahu as a distinct and equally valid knowledge system is strongly supported. Integrating mātauraka, ecological science, and community-derived information reflects the complexity of indigenous ecosystems and the relationships between lands, waters, and species. This approach will lead to more holistic and culturally grounded biodiversity outcomes, particularly for taoka species and places of significance to mana whenua.

28. Increasing native forest cover and other nature-based solutions are a key component to meeting net zero emissions targets at a local and national scale. Central government policy places heavy reliance on carbon removals to achieve national emissions reduction goals. ORC should leverage the funding opportunities associated with emissions offsetting to support

sequestration that delivers high biodiversity values alongside emissions reduction benefits. Relative to other carbon removals options, native forests offer co-benefits such as for biodiversity, water quality, resilience to extreme weather events, and recreation.

Alignment with National Policy Statements and Local Strategies

29. To strengthen the Strategy to be more resilience enabling and ensure that indigenous ecosystems, and the communities connected to them, are better prepared for climate impacts consider:
    - pursuing adaptive planning and monitoring frameworks that anticipate future ecological conditions, not just restoring past states
    - requiring restoration projects and nature-based solutions with co-benefits such as carbon sequestration, water regulation, erosion reduction, and biodiversity gains
    - implementing integrated catchment-scale frameworks that link biodiversity, water and hazard management, and that emphasise human and ecosystem wellbeing together
    - focusing on landscape-scale connectivity to buffer species shifts under climate change
    - building network resilience through corridors, climate refuges and permeability enhancements.

30. Enhancing urban ecosystems (parks, street trees, green infrastructure, green roofs) for biodiversity protection and as a buffer against climate impacts, DCC's Parks and Recreation Strategy 2017 – 2027 highlights the need to *"enhance our green network across Dunedin by physically and visually connecting parks, open spaces and streets".*

31. Dunedin's network of parks, gardens, reserves, and green corridors play a critical role in maintaining indigenous biodiversity within the built environment, and in connecting ecological areas across the city. DCC recommends including reference to urban biodiversity and the role of local authorities in maintaining ecological connectivity through green infrastructure, corridors, and urban forest initiatives.

32. The DCC's Parks and Recreation Strategy also identifies *"protecting and caring for our special places while enabling people to experience and enjoy Dunedin's parks and open spaces"* as a guiding principle. These spaces present a significant opportunity to enhance biodiversity outcomes by aligning recreation with ecological restoration efforts.

33. The DCC encourages the ORC to recognise recreation as a mechanism for public connection to biodiversity, strengthening environmental stewardship by providing pathways for communities to participate in restoration activities, experiential education, and citizen-science that deepens understanding of biodiversity.

34. The DCC supports the Strategy's alignment with the requirements of the NPS-IB (Section 3.23), particularly the obligation for regional councils to prepare a Regional Biodiversity Strategy that complies with Appendix 5 of the NPS. The Strategy provides an appropriate framework to guide regional and district planning instruments, and DCC acknowledges its responsibility to 'have regard to' this Strategy in future plan development.

On Other Areas

35. DCC asks what changes or impacts the ability to monitor cultural health of taoka species, their habitats, and mahika kai in comparison to tracking indigenous biodiversity across Otago.

36. With respect to Appendix 3, 1.1 Identifying Indigenous biodiversity focus areas, DCC requests more information about *how* these areas will be identified now and in the future.

37. With respect to Appendix 3, Explore incentives and co-investment models and encourage investment and innovation to support maintenance and enhancement, DCC would like confirmation on who "landowners" are under the 2025-2027 goals.

Conclusion

38. The DCC supports the overarching intent of the ORC Indigenous Biodiversity Strategy 2025 and welcomes continued collaboration with ORC in delivering shared biodiversity outcomes across Ōtepoti Dunedin and the wider Otago region.

39. The DCC looks forward to engaging further with ORC as implementation planning progresses and would appreciate opportunities to participate in any workshops or hearings.

40. The DCC commends ORC for taking this proactive step toward strengthening indigenous biodiversity protection in Otago.

41. The DCC wishes to speak to its submission at any hearings on this consultation.

Nāku noa, nā

Sophie Barker
MAYOR OF DUNEDIN
TE KOROMATUA O ŌTEPOTI