

30 April 2025

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SUBMISSION ON THE DUNEDIN CITY COUNCIL LONG TERM PLAN 2025-2034

INTRODUCTION

1. The Royal Forest & Bird Protection Society Inc. of New Zealand (Forest & Bird) is Aotearoa New Zealand's leading independent conservation organisation. Forest & Bird has played an important role in protecting and preserving New Zealand's environment and native species for a century.
Forest & Bird is independently funded by private subscription, donations, and bequests.
2. Forest & Bird has for many years had a strong interest and involvement in protecting and restoring nature on land, in freshwater and in the ocean, throughout the country including in the Dunedin area. Our Forest & Bird strategic objectives are as follows:
 - **Climate Centred:** Ensuring our country does everything we can to keep the climate safe for all life on Earth. The impact of climate change will be at the centre of everything we do.
 - **Economy that Supports Nature:** A Community that recognises that the long-term economy is dependent on a healthy environment for nature's intrinsic and lifegiving values.
 - **Vibrant Landscapes:** Stable, healthy ecosystems full of native animals and plants.
 - **Energised Water, Rivers and Wetlands:** Rivers, streams and freshwater that run clean, healthy and are teeming with life.
 - **Oceans Alive:** Protected and preserved marine life and ecosystems.
3. Forest & Bird have a very active volunteer branch in Dunedin, part of a network of 45 volunteer led branches nationally, whose multigenerational members and supporters play an important and active role in protecting and restoring the region's native species and habitats in their

respective districts.

4. Within Forest & Bird there is a wealth of knowledge and expertise on protecting and restoring Aotearoa New Zealand's native ecosystems and species. Forest & Bird also have regional Kiwi Conservation Clubs for tamariki, and Youth branches for rangatahi across the country.
5. Forest & Bird is grateful for the opportunity to provide feedback/submit on the Dunedin City Council's (DCC) Long-Term Plan. Forest & Bird acknowledges the work that staff and councillors are doing to improve the city through this process. We have commented on the sections of the plan that we have an interest in..

THE LTP NEEDS TO ACKNOWLEDGE DUNEDIN'S ENVIRONMENTAL ISSUES

6. **Investment in conservation is needed to help keep Dunedin a 'great small city' alongside being the 'wildlife capital of New Zealand'.**

Aotearoa New Zealand is in a combined climate and biodiversity crisis, with a high proportion of its native species threatened or at risk of extinction, making it one of the countries with the highest extinction rates globally. Between 2012 and 2017, population declines were recorded for sixty-one vascular plant species. Some threatened plants are key structural species for ecosystems, so their declines can have significant ramifications for their associated ecosystems. The major decline in many indigenous land-based species, and in some case their extinction, is largely the result of the substantial reduction in the extent and quality of natural habitats, the impact of introduced predators and herbivores and the legacy of past impacts. Indigenous vegetation continues to disappear with land use change and intensification.

In the DCC's pre-LTP engagement survey in October 2023, respondents said they wanted Ōtepoti Dunedin to be a sustainable and resilient city with less waste, strong biodiversity and a healthy environment.

Dunedin boasts a rich and unique biodiversity, often referred to as the "wildlife capital of New Zealand". This is due to its diverse habitats, including coastal areas, secluded beaches, and bush-clad hills, which support a wide array of native and endangered species. Even within the city limits, there are pockets of natural habitat that support native flora and fauna. Within the city's boundary there are natural habitats that are home to numerous native plant and animal species, 30 of which are found only in Dunedin. These habitats provide a wide range of important ecosystem services that sustain us and our health and wellbeing by providing food, clean air and water, and healthy soil.

Some of Dunedin's ecosystems provide other services such as stormwater cleaning swales, regenerating woody vegetation that absorbs carbon dioxide and water-producing tussock grasslands.

Wildlife tourism is a significant economic driver for Dunedin, estimated to contribute around \$100 million annually to the regional economy. This includes direct spending from wildlife tourism enterprises and increased spending from tourists drawn to the area by the presence of wildlife, such as on accommodation and food. The industry also supports around 800-1000 full-time equivalent jobs.

Despite the benefits biodiversity brings to Dunedin, it faces substantial challenges from land clearance, pest animals and plants, fragmented vegetation, and changing land use practices.

The health of Dunedin's natural environment cannot be protected, restored and enhanced without support and investment from the local authority, Dunedin City Council. This proposed 2025-34 LTP does not include any mention of biodiversity funding and focuses mostly on three waters and infrastructure upgrades and neglects the natural environment. DCC needs to be doing more than just providing a biodiversity grants fund to protect and restore biodiversity in the city.

The Local Government Act 2002 (LGA) purpose specifically states (10(1)(b)) that 'the purpose of local government is ... to promote the social, economic, **environmental**, and cultural well-being of communities in the present and for the future'. Therefore, the environment is 'core business' and we encourage the Council to invest in biodiversity as such. Improved biodiversity can also help support all the other functions of local government – social, economic and cultural well-being.

7. Dunedin city faces urgent environmental challenges in remaining a great place in which to live, work and visit

The Dunedin region is known for outstanding and distinctive landscapes and features, such as the Otago Peninsula, Aramoana salt marsh, Rock and Pillar ranges, Folden Maar, rolling hills, rivers, wetlands, and streams. These are important ecosystems for provisioning biodiversity values, regulation of water production, pollination and biological control, cultural values such as education, science, recreation and tourism values and supporting soil conservation values, carbon storage and sequestration.

Te Mana o te Taiao, Aotearoa New Zealand Biodiversity Strategy, was released in 2020 and is a roadmap driving conservation action happening at a national, regional and local level to address pressures on nature. It highlights five outcomes for biodiversity in New Zealand by 2050. The two important ones to mention here are Outcome one: Ecosystems, from mountain tops to ocean depths, are thriving and Outcome two: Indigenous species and their habitats

across Aotearoa New Zealand and beyond are thriving. DCC can do its part in achieving these outcomes by ensuring funds are earmarked for biodiversity in the LTP.

In EDS' Restoring Nature report, it was revealed that Regional and Unitary council spending on protecting biodiversity is \$82 million per annum (p. 168). While this sounds a lot, this amount is actually less than three percent of total rate collection by those councils, potentially indicating the low priority that biodiversity conservation is given in budgetary decisions. At the top end, Horizons Regional Council spent 15.5% and at the lower end, the ORC spent only 2.9% of the total rate collection on biodiversity. You can find the table here: <https://eds.org.nz/wp-content/uploads/2024/08/Restoring-Nature-Report-FINAL-web.pdf>

Although some responsibility for biodiversity falls to the regional authority, territorial authorities still have responsibility to implement the Regional Policy Statement, Regional Plan and for integrated management under RMA section 31, specifically (1)(b)(iii) 'the maintenance of indigenous biological diversity' and (1)(e) 'the control of any actual or potential effects of activities in relation to the surface of water in rivers and lakes', but also (f) 'any other functions specified in this Act'.

Being in a combined biodiversity and climate crises, it is important to recognise that wins for biodiversity also equal wins for climate. These issues cannot be looked at in isolation, and nature-based solutions such as healthy ecosystems can help us mitigate climate change. Biodiversity can do this by enhancing the resilience of ecosystems, allowing them to better adapt to changing environmental conditions like extreme weather events, by providing a wider range of species with different tolerances to temperature fluctuations, and by supporting vital ecosystem services like carbon sequestration through healthy vegetation and wetlands, thus regulating the climate naturally.

Significant Council investment is needed to address the challenges of biodiversity loss and climate change to help maintain the quality of life that greater Dunedin residents value.

8. Dunedin City Council needs to invest in ecosystem services for environmental and natural disaster resilience

Dunedin City remains susceptible to flooding, coastal erosion and extreme weather events. There are many benefits, known as 'ecosystem services' provided by a well-functioning natural environment and the indigenous biodiversity within to help buffer some of these hazards and events.

Ecosystem services are a great way to relate the presence and health of biodiversity to our built environments and the people which inhabit them. Following the devastating events the North Island experienced from the Auckland Anniversary weekend floods and then Cyclone Gabrielle

in 2023, LTP's throughout the country should reflect the urgency needed work with, not against, nature.

Recognising that as well as being vitally important for its own sake, nature is an asset that provides DCC with services that it cannot afford to lose and helps to combat the effects of climate change.

Nature-based solutions are defined as “actions to protect, conserve, restore, sustainably use and manage natural or modified terrestrial, freshwater, coastal and marine ecosystems, which address social, economic and environmental challenges effectively and adaptively, while simultaneously providing human well-being, ecosystem services and resilience and biodiversity”.

In the context of infrastructure, nature-based solutions may include some of the following:

- Daylighting streams and making ‘room for rivers’
- Permeable paths
- Urban forests
- Green roofs
- Green corridors
- Rain gardens
- Swales
- Floodable parks
- Wetland restoration

While it is important to integrate more healthy green spaces/nature-based solutions in our urban environment, such as those listed above, it is also crucial that we protect and enhance those already present. It is estimated that nature-based solutions can provide 37% of the mitigation until 2030 to achieve the targets of the Paris Agreement. The opportunity nature-based solutions provide the region must not be overlooked.

Council should incentivise nature-based solutions and protection of habitats.

The continued investment from Council enables the community to create and maintain these natural assets and is crucial as the city addresses biodiversity loss, climate change mitigations and adaption and the challenge of maintaining vibrant liveable cities.

9. Dunedin City Council needs to back their Zero Carbon Plan and Zero Carbon 2030 goal by including investment options in the Long Term Plan.

Forest & Bird submitted to the DCC's zero carbon survey in 2023, emailed each councillor urging their support of the Zero Carbon Plan (and funding of it) and addressed Council at the September 2023 council meeting where the Zero Carbon Plan and funding was voted on. During

this meeting, DCC adopted the Zero Carbon Plan, a pathway to reducing emissions and building a climate-resilient future. DCC also agreed to develop two investment packages (High and Medium) to implement the Zero Carbon Plan. This was to be included in the Long Term Plan consultation for public feedback.

Forest & Bird, along with others, celebrated this milestone and used the decision as an exemplar to other councils around the motu.

However in 2025, a motion was put forward to remove both funding options from the draft plan. This motion passed, meaning Dunedin residents no longer have a say on how the Zero Carbon Plan will be funded. Forest & Bird are incredibly disappointed with this decision, as this was the promised opportunity to consult with the Dunedin community on how much should be invested in our climate future. This decision means there is no longer any option for targeted funding to implement the Zero Carbon Plan, and the public doesn't get to have their say.

Forest & Bird strongly urge DCC to put the medium and high investment options to the public for consultation, and to include funding for these in the Long Term Plan.

10. Communities are doing the hard mahi

Communities continue to put in the mahi (work) to preserve what is left and create new spaces for nature to thrive. Across multiple organisations and thousands of hours of volunteer commitment, Forest & Bird nationally have seen pest populations managed, wetlands replanted and urban ngahere (forest) established and maintained.

All these efforts contribute to the mitigation and adaption to climate change and the preservation and enhancement of the habitat our indigenous species depend on. With a healthy natural environment comes a healthy society.

The Dunedin Forest & Bird volunteer branch are very active with on the ground work in the Dunedin City Area:

- Bring Back the Seabirds - Our Bring Back the Seabirds projects aim to enhance remnant breeding populations on the Otago coast and re-establish breeding species thought to be present at the time of the first human arrival. Our current projects include the predator free fence at St Clair protecting titi wainui/fairy prion at their only known mainland breeding colony in New Zealand, a sooty shearwater/titi colony at Sandfly Bay and seabirds at Lawyers Head.
- Forest Restoration at Moore's Bush - We are working to restore Moore's Bush, a 4-hectare podocarp forest scenic reserve in the Leith Valley. Our current focus is tree planting, removing exotic weeds, and maintaining the tracks and fences.

- Project Kererū Recovery project - Project Kererū is a voluntary community-based conservation project that is changing the fate of sick and injured kererū in Dunedin and surrounding areas with a rehabilitation and release program. Native planting around the aviaries (on DCC land) is also taking place.

11. Dunedin City Council should be supporting our most vulnerable species

In Forest & Birds 'Bird of the Year' 2024 competition, the DCC publicly supported the hoiho/yellow-eyed penguin, which won the competition. The DCC even shared a post on their Facebook page stating they were backing the hoiho, citing the penguin's serious struggles and need for help.

Hoiho are in significant trouble and facing potential extinction, particularly on the mainland. Their populations are rapidly declining due to a combination of factors, including introduced predators, disease, and changing ocean conditions.

Dunedin is one of the few places in New Zealand where these endangered penguins can be seen in the wild, particularly on the Otago Peninsula.

While the Bird of the Year competition win is great to highlight the importance of conservation efforts and inspire action to protect endangered species, it does not result in any extra funding to protect hoiho.

If the DCC really do care about hoiho and protecting them in Dunedin, funding should be provided in the long term plan to support organisations helping hoiho and preventing mainland extinction, such as the Yellow Eyed Penguin Trust and The Wildlife Hospital Dunedin.

LEGISLATIVE AND POLICY CONTEXT

12. The currently proposed LTP must meet the expectations of the Dunedin City Council that are set under legislation and national policy.

Local Government Act

The need for Council to support nature-based solutions is not only driven by desired outcomes for the wellbeing of nature and the community, but it is also a functional and legislative requirement.

Local Government (LG) must contribute to mitigating the impacts of climate change. Under the Local Government Act 2002 (LGA). There are multiple obligations, restrictions and powers

under which local authorities operate that relate to hazard management, which is directly linked to climate change and the management of natural assets.

National Direction

There are a multitude of central government policy statements (NPS) and plans territorial authorities must adhere to when making decisions. For the purpose of this submission, those most relevant to the protection and enhancement of the environment for the betterment of both nature and societal wellbeing are listed below:

- National Policy Statement for Indigenous Biodiversity (NPSIB)
- Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy
- Emissions Reduction Plan
- Climate Change Response (Zero Carbon) Amendment Act 2019
- Resource Management Act 1991
- Local Government Act 2002
- Wildlife Act 1953

The proposed budget fails to align with the purpose or pursue the objectives of the legislation and plans listed. DCC needs to enable its community to appropriately contribute to these national directives.

A critical requirement of both the national Emissions Reduction Plan and the National Adaptation Plan is to prioritise nature-based solutions in planning. This means that hazard management, infrastructure planning and resource management needs to prioritise nature-based solutions to problems.

The NPS-IB states that local authorities must include objectives, policies, and methods in their policy statements and plans to promote the restoration of indigenous biodiversity, including through reconstruction of areas (3.21(1)). If this is not currently the case with existing council policy statements and plans, then we suggest resource is allocated in the LTP to account for this need.

The NPS-IB gives local authorities eight years from commencement of the NPS-IB (4 Aug 23) to publicly notify any changes to their policy statements and plans that are necessary to give effect to the NPS. Forest and Bird submits that it is appropriate to include these requirements in the LTP, as some may be resource intensive and will require funding.

Councils should, through their LTP, recognise that nature is at the heart of the Aotearoa economy. Restoring nature will also help us to address the current impacts of climate change and be more resilient to future impacts. Te Mana o te Taiao includes goals that will make the roles and actions of local government clearer and easier. The council should familiarise themselves with these goals and actions and fund them appropriately.

Upholding the principles of the Te Tiriti o Waitangi (The Treaty of Waitangi) is an essential part of Te Mana o te Taiao. Working together in partnership towards a shared vision for nature will ensure that rangatira (chief) and kaitiaki (guardian) obligations, as well as mātauraka Māori, are actively protected.

The Royal Forest and Bird Society of New Zealand Incorporated wish to be heard in support of this submission.

We welcome any questions on our feedback/submission and would be happy to discuss further.

Kā Mihinui



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