



**Department of Conservation**  
***Te Papa Atawhai***

DOC-7312391

Annual Plan 2023-24  
Dunedin City Council  
PO Box 5045  
Dunedin 9054

Via email: [dcc@dcc.govt.nz](mailto:dcc@dcc.govt.nz)

Dear Sir/Madam,

***Department of Conservation Submission on Dunedin City Council Annual Plan 2023-24  
consultation document***

Please find enclosed a submission by the Director-General of Conservation in respect of the above plan.

Yours sincerely

A handwritten signature in blue ink that reads "Anne Wallace".

Elizabeth Anne Wallace  
Operations Manager  
Coastal Otago District

*For Director General*

**Department of Conservation *Te Papa Atawhai***  
Ōtepoti / Dunedin Office  
PO Box 5244, Dunedin 9054,  
[www.doc.govt.nz](http://www.doc.govt.nz)

## LOCAL GOVERNMENT ACT 2002

**To:** Dunedin City Council

**Submission on:** Dunedin City Council Annual Plan 2023-24 consultation document

**Name:** Penny Nelson, Director General of Conservation

**Address:** PO Box 5244  
Moray Place  
Dunedin 9058

### Statement of Submission by the Director General of Conservation

Pursuant to S83 of the Local Government Act 2002, I Elizabeth Anne (Annie) Wallace, Operations Manager of the Coastal Otago District Office of the Department of Conservation on behalf of the Director General of Conservation, make the following submission on the above consultation document.

1. I support the inclusion of resourcing in the Annual Plan to continue to build an enduring partnership with Kāi Tahu and submit that this resource be directed to create opportunities for the aspirations of Kāi Tahu to be included in all areas of Council work. I also submit that the Plan should provide resourcing to ensure that Kāi Tahu have adequate capacity to engage in this.
2. I support the need to invest in the future of Dunedin and see investment in the natural environment and people's ability to engage with it as being crucial to Dunedin's success. The natural environment contributes significantly to Dunedin's economy, for example via ecotourism and ecosystem services. It also provides for people's mental and physical wellbeing and contributes significantly to the attraction of Dunedin as a place to live and visit. The Plan should promote enhancement of the natural environment as an underlying theme across all of the Council's work and developments.
3. The Department notes the importance of the Dunedin coastline to high-profile threatened coastal species including pakake/NZ sea lion and Hoiho/yellow-eyed penguin. Both of these species are subject to collaboratively-developed management plans which note the importance of relevant agencies working together to minimise the impact of human activity of these species. I note the work Council has already done on this subject during the course of the Long Term Plan. This has facilitated effective collaboration between our agencies and improved outcomes for these species. There has been a wide range of work across Council's functions to deliver on this, I submit that this continue to be resourced, in particular: the DCC/DOC Summer Ranger program, Transport's ability to respond to wildlife on roads and dog management. There is much that can still be achieved and these actions will become more important as the sea lion population continues to return and as we adapt to climate change. I submit that the Council should continue to allocate resources across the range of its activities to understand and manage impacts of human activity on coastal species. Relevant opportunities to address issues will continue to arise through the Council's role in the management of vehicles and dogs as well as the provision of public infrastructure, recreation opportunities and advocacy. I submit that matching the level of dog management to the number of dogs in the city, alongside engagement with dog owners

through activities like DOC's 'Lead the Way' program are effective approaches to achieving this and should be resourced by Council.

4. I note the continued high level of public support for Predator Free 2050 and Predator Free Dunedin. I acknowledge the investment the Council has made in Predator Free Dunedin and support the continuation of this investment. Through this initiative many gains have been made including biodiversity conservation and improving people's connection to nature (and therefore improved mental and physical wellbeing.) The initiative is also a demonstration that Dunedin is a progressive, exciting place to live where huge goals can be achieved. I submit that the high level of both financial and operational support from the DCC for Predator Free Dunedin should continue, especially the 'City Sanctuary' program. The work being done toward achieving this goal is obvious and with a continued commitment of resource the city can look forward to realising the potential benefit of a Predator Free Dunedin.
5. Climate change continues to be an important issue for the city. I note the high value of the Dunedin coastline and the wide range of activities (such as tourism, transport, dwellings and agriculture as well as infrastructure associated with these) that take place on or near it. I also note the importance of planning for sea level rise in a holistic way that allows for appropriate human use while also allowing natural processes to continue and protecting wildlife and other taonga. I therefore submit that the Council should continue to use the principles and objectives within the Coastal Policy Statement 2010 (or any revision of it) to guide its thinking on how to respond appropriately to coastal management issues. I submit that the Plan should include funding for climate change adaptation especially to mitigate pressures on coastal ecosystems and wildlife in situations where coastal infrastructure, development or human activity is putting pressure on the habitat of wildlife such as sea birds and sea lions.
6. I note that the Department has contributed significantly to the development of Te Ao Tūroa, Dunedin's Environment Strategy, and continues to be committed to its governance and outcomes. Te Ao Tūroa identifies specific actions, and I submit that sufficient funding should be allocated in the Plan to make meaningful progress against them, in particular through the resourcing of the Council's Biodiversity Officer and biodiversity policy.
7. I note the work that has begun to develop a Spatial Plan for Dunedin as well as the current work on a Future Development Plan for Dunedin. I submit that council should ensure that resource is in place to enable these processes to deliver the outcomes of Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy.
8. I note the work to date on the Dunedin Destination Management plan, its focus on the four wellbeings and a regenerative tourism approach to achieving these. This is well aligned to the Department of Conservation Heritage and Visitor Strategy. I submit that Council should adequately resource the destination management function to achieve this.
9. I acknowledge the Council's financial and operational support to the Town Belt Kaitiaki education program, and support the allocation of a high level of resourcing through this Annual Plan.
10. I acknowledge the resource and work the Council has contributed toward our collaboration at Tunnel Beach. The commitment through the duration of this project and

approach taken by Council and Council Staff have led to a very high-quality outcome for the city. I submit that Council should fund continued commitment to this collaboration as it moves toward habitat restoration of the surrounding coast and a continued focus on this site as an iconic asset for the city.

11. I note the high level of public support for Dunedin's track network, I note that the Department has contributed to the development of the 'Outdoors in Ōtepoti' Recreation Tracks Plan 2022 and Recreation Strategy 2017 –2027 and continues to be supportive of their goals. I reaffirm the Department's desire to continue working with the DCC to holistically manage the city's track network across our respective land tenures. I submit that the Plan should fully fund the delivery of the Tracks Plan 2022 to deliver a fit for purpose track network in the city. I submit that funds should be provided in the Annual Plan to:
- a. Complete the MOU between DCC, DOC and the Dunedin Tracks Network Trust and begin a productive collaboration between these parties.
  - b. Improvements to wayfinding signage across the track network, in particular at Bethunes Gully and Flagstaff/Pineapple Track,
  - c. A program of upgrades and improvements to the highest priority Urban and Short Walks to meet the standards contained in SNZ HB 8630:2004, in particular at the Organ Pipes.
  - d. Develop a decision making framework for adequate investment in priority tracks and connection in the network.
  - e. Continue to understand the desires of track users, the number of people who use particular tracks in the network and use this to inform communication, maintenance and investment.
  - f. Consider the alignment of the track network to Blue and Green Networks – for future development.
  - g. Support capable community groups and organisations with their projects, especially where these align with Blue and Green Networks e.g. at Tunnel Beach to Cargills Castle, Otago Peninsula, Waitati to Waikouaiti and Waihola to Mosgiel.
  - h. Do the above in a way that provides benefits to adjacent species and ecosystems without increasing visitor pressure on these.

This work would be in response to a clear desire from residents for such a network identified in research conducted by the Council. Benefits of this could include:

- i. Increased appreciation of Dunedin's walking opportunities and wild spaces.
  - j. Wellbeing of Dunedin people would be improved by spending time in nature on a walking / biking track.
  - k. Dunedin's economy would benefit from better walking and nature experiences retaining visitors in the city for longer and making the city a great place to do business
  - l. Continuing to manage Risks to people using tracks.
  - m. Human impact on wildlife at managed sites would decrease.
  - n. The stories of key Dunedin heritage sites would better be told.
  - o. Dunedin's reputation as a great small city would improve.
12. I note the high level of effective collaboration between DOC and Council staff and the Parks and Recreation team in particular. This has been the result of highly capable people in this team, past and present as well as good governance support for these people and their work. I cannot speak highly enough about what this has allowed us to achieve

collectively for the city and the potential benefits to all four wellbeings. I submit that council consider resourcing this team in a way that ensures highly capable people can be attracted and retained and continue to provide effective and enabling governance for this work.

13. I note the value of a collaborative approach to Biodiversity in the Otago Region and its importance in achieving Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy, I submit that the Plan should resource the Council's continued input into the Otago Biodiversity Forum or any equivalent collaborative group and resourcing of biodiversity projects and other actions proposed through these forums or to achieve the outcomes of Te Mana o te Taiao.
14. I note the success to date of the Jobs for Nature projects within the city and submit that the Council consider resourcing work to secure the outcomes of these projects and the Government's billion dollar investment in this programme.
15. The Dunedin Wildlife Hospital makes a significant contribution to wildlife in the city, delivering on the city's values. This is particular true for the conservation of Hoiho, a key species in the city's economy and community values. I acknowledge the contribution DCC makes toward the Hospital as a cornerstone partner and submit that Council should continue to do this.
16. I note the benefits to biodiversity and recreation of Council's Reserves and Beaches Bylaw work. I submit that the Plan should continue to resource the management of these spaces for both biodiversity and recreation. A good example of this is the DCC/ DOC Summer Ranger program, which has had a positive impact on public behaviour on reserves and beaches. I submit that the Plan should continue to resource this program as it is a good value for money, practical approach to outreach. The program delivers multiple tangible benefits to the residents and visitors who use these spaces along with ecosystems and wildlife.
17. I note the significant demand for funding for biodiversity protection, indicated every year by the over-subscription of the Biodiversity Fund and note the increased fund size this year. This is an excellent development and I submit that this funding level be retained or increased to support the protection of biodiversity on private land. I also support additional funding for heritage protection and submit that consideration should be given to a broader range of heritage values including Māori heritage and archaeology, beyond just identified Wāhi Tūpuna, Wāhi Tapu and Wāhi Tapu areas to include places where papatipu Rūnaka have expressed significance.
18. I submit that through the proposed work to repair, replace and upgrade stormwater and wastewater systems in the city that the Plan resources work to ensure the preservation of indigenous ecosystems and species through the planning and delivery of this work.
19. I support the increased funding for infrastructure for different transport modes and submit that this funding should be allocated by the Plan in a manner that increases the opportunities for all residents and visitors to connect with nature, and the health and wellbeing benefits that this brings.
20. The DCC's Volunteer Project Facilitator role has led to an increase in volunteering towards important conservation projects. This has aided conservation led by the

community as well as by the DCC and DOC. Agencies and community groups have been able to deliver more work than resourcing would otherwise allow as a result of this. Community interest in volunteering opportunities has increased. I submit that the Plan should allocate funding directly to the activities of the facilitator in identifying volunteering opportunities as well as additional supervision, transport, tools and PPE resource to allow the Council's work programs to deliver these opportunities. The Department currently contributes financially to this role however this funding is annually contestable, and so cannot be guaranteed. Due to the wide benefits of this role I submit that the Annual Plan should allocate funding to ensure this role can be fully funded from within the DCC if required.

The issues I have identified span land tenure, jurisdictional and legislative boundaries and I therefore flag the desire of the Department to work collaboratively with the Council and others to help address them. I recognise and value the collaboration our organizations have had in the past and hope we can continue to build on these.

The policies and plans I have referred to are available as follows:

New Zealand Sea Lion/rāpoka Threat Management Plan

<https://www.doc.govt.nz/Documents/conservation/native-animals/marine-mammals/nz-sea-lion-tmp/nz-sea-lion-threat-management-plan.pdf>

*Te Kaweka Takohaka mō te Hoiho* - A strategy to support the ecological and cultural health of hoiho

<https://www.doc.govt.nz/globalassets/documents/conservation/native-animals/birds/sea-and-shore/te-kaweka-takohaka-mo-te-hoiho-2020.pdf>

New Zealand Coastal Policy Statement 2010 <https://www.doc.govt.nz/nzcps-2010>

Te Mana o te Taiao – The Aotearoa New Zealand Biodiversity Strategy

<https://www.doc.govt.nz/nature/biodiversity/aotearoa-new-zealand-biodiversity-strategy/>

Department of Conservation - Heritage and Visitor Strategy <https://www.doc.govt.nz/heritage-and-visitor-strategy>

I do not wish to be heard in support of this submission.

Dated at Dunedin this 20<sup>th</sup> day of April 2023.



Elizabeth Anne Wallace  
Operations Manager  
Coastal Otago District Office  
*Acting pursuant to delegated authority*