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SUBMISSION TO OTAGO REGIONAL COUNCIL ON THE DRAFT INDIGENOUS BIODIVERSITY STRATEGY

Thank you for the opportunity to present this submission on the draft Otago Indigenous Biodiversity Strategy (the Strategy). The Queenstown Lakes District Council (QLDC) has appreciated the opportunity to be engaged early on the update of the Strategy through the Otago Biodiversity Forum.

QLDC is supportive of the overall direction and intent of the Strategy, and has provided some recommendations to further strengthen the outcomes of the Strategy, including that Otago Regional Council (ORC):

- Provide more information on how the Strategy delivers on the objectives of the Otago Regional Policy Statement and integrates with ORC's other strategies and plans.
- Expand upon the key issues for biodiversity in the region, to provide clearer context for the vision, outcomes and principles of the Strategy.
- Incorporate Appendix 3 into the body of the Strategy.
- Amend Outcome 1 to be more ambitious and reflect the significant restoration work required to reverse current trends of biodiversity loss within the region.
- Supports the Integrated Catchment Management Programme and implementation of the Upper Lakes Catchment Action Plan in protecting and enhancing ecosystems within the Queenstown Lakes District.
- Leads developing a region-wide indicator framework, shared monitoring methodologies and open-access biodiversity geospatial layers.

QLDC looks forward to continued collaboration with ORC to support healthy, thriving and resilient indigenous biodiversity across the region.

QLDC would not like to be heard at any hearings that result from this consultation process.

Thank you again for the opportunity to comment.

Yours sincerely,



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1.0 Context of indigenous biodiversity protection within the Queenstown Lakes District

- 1.1 Queenstown-Lakes District (QLD) is a district with an average daily population of 81,660 (visitors and residents) and a peak daily population of 122,490. By 2055, this is forecast to increase to 147,518 and 221,276 respectively¹. As a high-growth district, there is significant pressure on indigenous biodiversity through habitat loss and fragmentation as a result of urban development, as well as an increased risk of pollution and incursion of invasive species.
- 1.2 The QLD has engaged communities that are actively involved in efforts to protect and enhance the district's biodiversity. As recognised in the Queenstown Lakes District Council's (QLDC) strategic framework, the community's vision is for a "deafening dawn chorus" and a place where ecosystems flourish².
- 1.3 On 27 June 2019, in response to community feedback, QLDC declared a climate and ecological emergency and developed its first Climate Action Plan. In July 2025, Council adopted the third iteration of the plan, and the second to specifically integrate biodiversity. The Queenstown Lakes Climate & Biodiversity Plan 2025-2028, places Te Taiao (the natural environment) at the centre of Council's planning and decision-making, acknowledging that we are an integral part of Te Taiao.
- 1.4 The Queenstown Lakes District Plan identifies and protects Significant Natural Areas (SNAs) and other areas with high indigenous biodiversity values. Chapter 33 of the Proposed District Plan enables the ongoing identification and protection of SNAs through resource consent applications and encourages landowners to consider non-regulatory approaches for protecting indigenous biodiversity.
- 1.5 QLDC also has its draft [Blue-Green Network Plan](#) which is out for consultation until 12 December 2025. This provides a strategic plan for how the district will protect and enhance biodiversity and ecosystems within priority development and settlement areas.
- 1.6 QLDC, ORC, other territorial authorities in the region, central government agencies and Mana Whenua currently collaborate on biodiversity matters through the Otago Biodiversity Forum. QLDC appreciated the opportunity to engage early on the draft Otago Indigenous Biodiversity Strategy through this forum, and supports the overall direction and intent of the Strategy.

2.0 An integrated approach is required to address ecosystem pressures and the drivers of biodiversity loss

- 2.1 The pressures of land-use change, pollution, invasive pest species and climate change have individual and cumulative impacts on ecosystems and indigenous species within Aotearoa³. Whilst these pressures are briefly mentioned in the draft Indigenous Biodiversity Strategy, there remains a strong focus on biosecurity and pest management.
- 2.2 The draft Strategy could be strengthened by acknowledging the complexity of these pressures and drivers of biodiversity loss within the region, referencing how the Strategy interacts with ORC's other strategies and plans, such as the Climate Change Strategy and Regional Plans. Additionally, to highlight the interdependency between climate and biodiversity the Strategy could reference ORC's Climate Change Strategy.
- 2.3 QLDC notes that the draft Strategy is a key delivery mechanism for achieving the intent of the Otago Regional Policy Statement (RPS). To maximise effectiveness, the Strategy should explicitly reference how the workstreams will operationalise relevant RPS provisions, particularly the ecosystems and

¹ <https://www.qldc.govt.nz/community/population-and-demand>

² <https://www.qldc.govt.nz/your-council/our-strategic-framework/>

³ <https://environment.govt.nz/assets/publications/our-environment-2025.pdf>

indigenous biodiversity chapter, integrated catchment management requirements, monitoring requirements, and partnership obligations with Kāi Tahu.

Recommendation:

R.1. Provide more information on the pressures on biodiversity within Otago.

R.2. Outline how the Indigenous Biodiversity Strategy will deliver on the objectives of the Otago Regional Policy Statement and integrates with ORC's other strategies and plans to address the complexity of pressures and drivers of biodiversity loss within the region.

3.0 The Strategy should provide more information on the key issues and the short, medium and long-term goals for biodiversity in Otago

- 3.1 Whilst the key biodiversity issues for the region are briefly outlined in the section "Where are we now?" (pp. 8-9), further detail could be provided to highlight what has changed since the Biodiversity Strategy in 2018. For example, including information on the key achievements since the last Strategy, the priorities which have changed and the urgency to address certain issues changed, if applicable. This provides useful context for the vision, outcomes and principles of the Strategy over time. A summary of key issues, similar to that presented in the Biodiversity Strategy 2018 (p. 8) could be an effective way of summarising this information and connecting to the vision, outcomes and principles of the updated Strategy.
- 3.2 Appendix 3 provides a good summary of action already underway, and the short, medium and long-term goals for biodiversity in the region. This information is key to the Strategy and should be included in the body of the Strategy, rather than included as an appendix.

Recommendation:

R.3. Include further information on the key biodiversity issues for the Otago region, to provide context for the vision, outcomes and principles of the Indigenous Biodiversity Strategy.

R.4. Incorporate key information included in Appendix 3 into the body of the Strategy.

4.0 Outcomes should be ambitious to support the long-term vision of the Strategy

- 4.1 QLDC supports the principles and long-term vision of the Strategy however encourages ORC to be more ambitious with the outcomes set to support the vision. For example, if ORC is leading proactive responses to emerging issues (Outcome 5) and the decline of indigenous species and ecosystems is being reversed (Outcome 6), then Outcome 1 needs to reference more than only 'maintaining biodiversity'.
- 4.2 The Strategy notes that "reversing current trends will require clear priorities, sustained commitment, and coordination across the many groups and sectors who have a part to play" (p. 9). Outcomes 1 and 2 could be combined and amended to reference the restoration and enhancement effort that will be required to reverse current trends and ensure the region's most vulnerable ecosystems and species are not lost.

Recommendation:

R.5. Reword Outcome 1 to be more ambitious to reflect the restoration and enhancement work required to reverse current trends in biodiversity loss.

6.0 Importance of monitoring and sharing data should be reflected in the Strategy

6.1 QLDC recognises the importance of having regional indicators to monitor the status and trends of indigenous biodiversity to help inform regional and local decision making. QLDC has a commitment within the Climate & Biodiversity Plan 2025-2028 (p. 35) to collaborate with ORC and other conservation partners to improve collection and sharing of environmental data. This will strengthen our collective ability to protect and restore indigenous biodiversity within the district and region. ORC has an important role to play in the collection and sharing of environmental data, including developing a region-wide indicator framework, shared monitoring methodologies and biodiversity geospatial layers.

Recommendation:

R.6. QLDC recommends that ORC takes the lead with developing a region-wide indicator framework, shared monitoring methodologies and open-access biodiversity geospatial layers.

7.0 Importance of continued funding and partnership for the implementation of the Strategy

7.1 It is vital that implementation of the Strategy is fully funded to build on achievements to date. Without adequate funding, the region risks losing the biodiversity gains that have already been made. The ORC's ECO Fund has been an important contributor to biodiversity work in the region.

7.2 QLDC would like to commend ORC on the work undertaken through the Integrated Catchment Management Programme, working with Mana Whenua and local communities on the Upper Lakes Catchment Action Plan (CAP). This work is vital for protection and restoration of ecosystems that support the indigenous biodiversity in the region. QLDC urges ORC to continue this work and looks forward to working collaboratively with ORC on the implementation of the Upper Lakes CAP.

7.3 QLDC supports a review of the ECO Fund criteria to align with the objectives of catchment action plans such as the Upper Lakes CAP.

Recommendation:

R.7. QLDC recommends that ORC continues to support the Integrated Catchment Management Programme and implementation of the Upper Lakes Catchment Action Plan, with funding aligned with the objectives of these plans.